

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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JASON LEOPOLD, BUZZFEED, INC.,))	
))	
Plaintiffs,))	
))	
v.))	Civil Action No. 19-cv-1278 (RBW)
))	
UNITED STATES DEPARTMENT OF))	
JUSTICE, et al.))	
))	
Defendants.))	
<hr/>)	
CABLE NEWS NETWORK,))	
))	
Plaintiff,))	
))	
v.))	Civil Action No. 19-cv-1626 (RBW)
))	
FEDERAL BUREAU OF))	
INVESTIGATION,))	
))	
Defendant.))	
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DEFENDANT’S NOTICE OF COMPLIANCE WITH COURT ORDER

Defendant respectfully provides notice that it is filing the attached declaration in compliance with the Court’s Order of October 16, 2020. *See* Order, Dkt. 111.

Dated: October 20, 2020

Respectfully submitted,

JEFFREY BOSSERT CLARK
Acting Assistant Attorney General
Civil Division

ELIZABETH J. SHAPIRO
Deputy Director
Federal Programs Branch

/s/ Courtney D. Enlow

COURTNEY D. ENLOW (N.C. Bar No. 46578)

Trial Attorney

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Counsel for Defendant

DECLARATION OF MARK R. MEADOWS

I, Mark R. Meadows, declare the following to be true and correct:

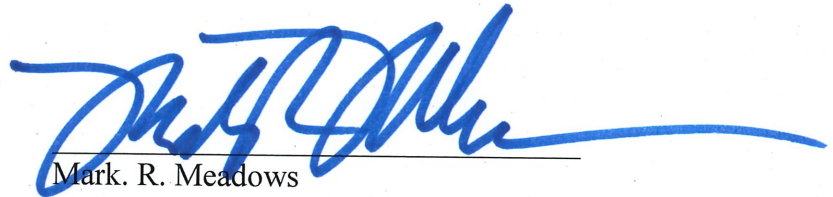
(1) I am Chief of Staff to President Donald J. Trump. In light of the orders the Court entered in *Electronic Privacy Information Center v. Department of Justice*, No. 19-cv-810 (D.D.C.), and *Leopold v. Department of Justice*, 19-cv-1278 (D.D.C.) on October 16, 2020, I conferred with the President concerning his intentions with respect to two statements he made on Twitter on October 6, 2020 relating to declassification.¹ In conformity with the Court's orders, I am submitting this declaration to make clear the President's intent.

(2) The President indicated to me that his statements on Twitter were not self-executing declassification orders and do not require the declassification or release of any particular documents, including the FD-302 reports of witness interviews prepared by the Federal Bureau of Investigation in connection with the investigation conducted by Special Counsel Robert Mueller, III. Instead, the President's statements related to the authorization he had provided the Attorney General to declassify documents as part of his ongoing review of intelligence activities relating to the 2016 Presidential election and certain related matters. The President's statements do not require altering any redactions on any record at issue in these or any other cases, including, but not limited to, any redactions taken pursuant to any discretionary FOIA exemptions.

¹ See <https://twitter.com/realDonaldTrump/status/1313640512025513984>;
<https://twitter.com/realDonaldTrump/status/1313650640699224069>.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 20 day of October, 2020.



Mark. R. Meadows