



# FREEDOM WATCH

► [www.FreedomWatchUSA.org](http://www.FreedomWatchUSA.org)

► **World Headquarters** 2020 Pennsylvania Avenue, N.W., Suite 345, Washington, DC 20006-1811 ► (310) 595-0800 ► [leklayman@gmail.com](mailto:leklayman@gmail.com)

January 2, 2018

VIA FACSIMILE, FEDEX AND MAIL

Robert Mueller, Esq.  
Special Counsel  
U.S. Department of Justice  
950 Pennsylvania Avenue, N.W., Suite 3266  
Washington, D.C. 20530

Laurie Day  
Chief, Initial Request Staff  
Office of Information Policy  
U.S. Department of Justice  
1425 New York Avenue, N.W., Suite 11050  
Washington, DC 20530-0001  
Fax: (202) 514-1009

FOIA/PA Mail Referral Unit  
U.S. Department of Justice  
LOC Building, Room 115  
Washington, DC 20530-0001  
Fax: (202) 616-6695

Ms. Amanda Marchand Jones  
Chief, FOIA/PA Unit  
Criminal Division  
U.S. Department of Justice  
Keeney Building, Suite 1127  
950 Pennsylvania Avenue, N.W.  
Washington, DC 20530-0001  
Fax: (202) 514-6617

Federal Bureau of Investigation  
Attn: FOI/PA Request  
Record/Information Dissemination Section  
170 Marcel Drive  
Winchester, VA, 22602  
Fax: (540) 868-4391

Re: Freedom of Information Act Request

Dear Ladies and Gentlemen:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, and regulations promulgated thereunder, we hereby request from the Office of Special Counsel Robert Mueller, the U.S. Department of Justice (DOJ) upon which his authority and mandate rests and depends, and DOJ's Federal Bureau of Investigation, any and all documents that refer or relate in any way to the specific request set forth below.

Freedom Watch requests expedited processing of this request pursuant to 28 C.F.R. § 16.5 (e) of the regulations governing the the requestees' operations because time is of the essence in the events at issue for public knowledge of the nation's citizens.

Freedom Watch requests that you provide the requested documents within ten (10) calendar days of receipt of this request.

### **FREEDOM OF INFORMATION REQUESTS**

For the purpose of this Freedom of Information Act Request (FOIA Request), you must consider and comply with this request in good faith and in a timely matter. Please note that a document that has been altered with the addition of handwritten notes or other information added is not the same document as the unaltered original.

#### **Definitions**

For the purpose of this FOIA request the term "document" is hereby defined expansively to include any or all of the following, whether existing as electronic, digital, or computer data, in electronic or digital form, or in paper form: correspondence, letters, memoranda, recommendations, records, orders, plans, proposals, meeting agendas, minutes of meetings, briefing materials, progress reports, weekly reports, talking points, briefing papers, requests for action, telephone logs, telephone message books, notes of phone messages or visits, routing slips, buck slips, standard government forms containing information filled in on lines or blank spaces, slide presentations, "card decks" (for presentations at meetings), power-point presentations, facsimiles (faxes), notes, handwritten notes, notes to the file, requests for decision, requests for authorization, tape recordings, video recordings, electronic mail (email) messages, summaries, briefs, orders, written decisions, applications, , and/or other documents and things. In addition, with regard to payments to persons or vendors, documents also include all invoices, bills, contracting records, commitment of funds, obligation of funds, or disbursement records.

For the purposes of this FOIA request, you are to search and produce any responsive documents or records that are within the U.S. Department of Justice's possession, custody, or control regardless of who authored or created the document or record.

For the purposes of this FOIA request, the term "communication" includes any form of communication, such as by letter, by facsimile, by note, by telephone text message, by electronic mail (email), computer messaging service, or by any other means.

The time period for records that we request is records created on or after July 1, 2015, through December 31, 2017.

For identification purposes, the Robert Mueller referred to herein is also known as Robert Swan Mueller III, an American lawyer who was the sixth Director of the Federal Bureau of Investigation, serving from September 4, 2001, to September 4, 2013, and was appointed a Special Counsel on or about May 17, 2017. For ease of your reference, a copy of Robert Mueller's appointment is attached as Exhibit A.

### Requests

Request #1                      Any and all documents and records as defined and set forth above that refer or relate with regard to communications to and from the media, domestic and foreign, concerning the activities of Special Counsel Robert Mueller and/or his staff as well as the Federal Bureau of Investigation, concerning the investigation of alleged Russian collusion and related matters concerning the Trump Presidential Campaign and the Trump Transition Team with the print, internet, social media and radio and television networks including but not limited to: New York Times, The Washington Post, Los Angeles Times, Politico, The Daily Beast, Slate, Huffington Post, Associated Press, Reuters, MSNBC, NBC, ABC, CBS, CNN, The Hill, Mother Jones, New Republic, McClatchy, and any other media outlets, where they be print, radio, social media television or other media.

### LEGAL GUIDELINES

In accordance with FOIA and its regulations, policies and precedents directing that the FOIA focuses on information, not only documents, we request maximum disclosure of information and documents, including any segregable portions of documents if some portions are withheld due to a claim of privilege or exemption.

If any documents are withheld subject to any claim of privilege or exemption, we request complete information about each document withheld, including which paragraph of the request to which the document is responsive; the author and title of the document; an explanation of the applicability of the claimed exemption to the contents of the document; and the name and title of each person responsible for the denial.

Furthermore, as to any claim that documents will be withheld on the basis of any deliberative process privilege we draw your attention to the legal requirements that the deliberative process exemption does not permit withholding of --

- (a) facts which are segregable from deliberations
- (b) opinions about such facts which merely convey or further describe factual information;
- (c) any deliberations unrelated to any actual decision;
- (d) any deliberations in areas where there are allegations of governmental misconduct, and
- (e) deliberations, opinions, or recommendations that are incorporated into a final decision and/or which serve to explain a final decision by the government.

We therefore demand production of all documents in unredacted form notwithstanding any possible claim of the deliberative process exemption or any other claimed exemption.

### **REQUEST FOR FEE WAIVER**

The requesters also respectfully request a blanket fee waiver on behalf of the public interest, to which it is entitled under 5 U.S.C. § 552(a)(4)(A); *see also, Larson v. Central Intelligence Agency*, 843 F.2d 1482, 1483 (D.C. Cir. 1988); *National Sec. Archive v. U.S. Dept. of Defense*, 880 F.2d 1381, 1385-87 (D.C. Cir. 1989); *see also, Judicial Watch, Inc. v. United States Dep't. of Commerce*, No. 95-0133 (D.D.C. May 16, 1995) (order granting Judicial Watch USA, Inc.'s request for fee waiver with regard to all responsive documents in proceeding).

Requester Freedom Watch USA, Inc. is a non-profit, non-partisan, tax-exempt 501(c)(3) organization which as a public interest organization which specializes in deterring, monitoring, uncovering, and addressing public corruption in government. Freedom Watch USA has and will hold Republicans, Democrats, and Independents equally accountable to ethical and legal standards for honest and open government. It disseminates information, as is its mission, to the public through its website at [www.freedomwatchusa.org](http://www.freedomwatchusa.org), press releases, seminars and speeches, the radio show of its chairman and general counsel, Larry Klayman (see [www.radioamerica.org](http://www.radioamerica.org) or [www.freedomwatchusa.org](http://www.freedomwatchusa.org)), You Tube, Roku, Amazon Fire, Twitter, and appearances on other radio shows and cable news networks such as Fox News, One America Network, i 24, and Newsmax.com. Freedom Watch's chairman and general counsel, Larry Klayman, also has published a weekly column at [www.wnd.com](http://www.wnd.com) and has a blog named "Klayman's Court" at Newsmax.com, among other forms of public dissemination of information to educate the citizenry.

The requesters have no commercial purpose as a 501(c)(3) non-profit organization organized exclusively to improve the ethical and legal standards in government, accountability of government officials to the rule of law, and public understanding of government operations.

Freedom Watch thus will also use the requested material to promote accountable government as a representative of the news media and the public in accordance with 5 U.S.C. § 552(a)(4)(A)(ii)(II) and *National Sec. Archive v. U.S. Dept. of Defense*, 880 F.2d 1381, 1385-87 (D.C. Cir. 1989), by disseminating relevant information which may be uncovered. Information will benefit the public by identifying areas for future reform as well as deterring future abuses that could otherwise proliferate without scrutiny.

The subject of this request is information concerning the operations and activities of the government. Past experience demonstrates the success of Freedom Watch in uncovering important facts about government activities, integrity and operations, of broad concern to the public. This request is likely to “contribute significantly” to the public’s understanding of the operations of their government, satisfying the requirements of FOIA fee waiver provisions.

Immediate release of the requested information is in the public interest, including for promoting confidence in an honest democratic system, and furthering the integrity of the American national government by deterring and/or sanctioning corrupt activities. The failure to do so will likely result in the further compromise of important interests of the American people.

### **REQUEST FOR EXPEDITED PROCESSING**

Freedom Watch hereby requests expedited processing of this request pursuant to 5 U.S.C. § 552(a)(6)(E)(ii)(I), as there is a compelling need for this information and time is truly of the essence in this matter. *See Open America v. Watergate Special Prosecution Force*, 547 F.2d 605, 614-16 (D.C. Cir. 1976) (holding that requests that involved a far greater degree of urgency than others should be processed out of turn).

This request is extremely urgent, as the investigation by Special Counsel Robert Mueller is currently ongoing, and there are new leaks emerging from his office nearly every single day, which is harming the reputation and livelihoods of a number of people that are under investigation and, as importantly, as well as the reputation, integrity and the public’s trust of the justice system. The American people therefore need this information urgently, and given Freedom Watch’s role in disseminating information, as set forth above, expedited processing of this instant request is the best avenue for the release of this information to the masses and citizenry. Particularly since Special Counsel Robert Mueller has assembled a large team and spent nearly \$7 million in the first five months, there is therefore no reason that they cannot produce the requested documentation within 10 calendar days, and it is clear that there is no reason for delay particularly since the DOJ and its Federal Bureau of Investigation have literally thousands of employees and have claimed a high priority to expediting the conclusion of Special Counsel Mueller’s investigation in the nation’s interest.

In sum, there is therefore a great urgency to inform the public, pursuant to *Al-Fayed v. C.I.A.*, 254 F.3d 300, 310 (D.C. Cir. 2001) and relevant regulations, policies and case

law, as the request clearly concerns a matter of current exigency to the American public. Special Counsel Mueller's investigation is ongoing, and is being conducted using a significant amount of taxpayer money. The information and documents sought needs to be presented and disseminated to the public forthwith. Any delay would further damage the reputations of the people under investigation and, as importantly, the remaining confidence that the American people have in the justice system.

Pursuant to U.S.C. §552(a)(6)(E), the foregoing is true and correct to the best of Freedom Watch's knowledge and belief.

Sincerely,



Larry Klayman, Esq.  
Freedom Watch, Inc.  
2020 Pennsylvania Ave, N.W., Suite 345  
Washington, D.C. 20006  
Tel: 310 595 0800  
leklayman@gmail.com

Chairman and General Counsel

PLEASE SEND TRUE COPIES OF THE REQUESTED DOCUMENTS WITH 10  
CALENDAR DAYS BY EXPRESS MAIL, AS DEFINED HEREIN, TO THE ABOVE  
ADDRESS.

## FAX COVER SHEET

TO	Laurie Day
COMPANY	Office of Information Policy
FAXNUMBER	12025141009
FROM	Larry Klayman
DATE	2018-01-03 00:29:25 GMT
RE	Freedom of Information Act Request

### COVER MESSAGE

Attached is a request made under the Freedom of Information Act by Freedom Watch, Inc., through its chairman and general counsel, Larry Klayman. The request is eight (8) pages in length, including one exhibit labeled as "Exhibit A."

## FAX COVER SHEET

TO	FOIA/PA Mail Referral Unit
COMPANY	
FAXNUMBER	12026166695
FROM	Larry Klayman
DATE	2018-01-03 00:29:27 GMT
RE	Freedom of Information Act Request

### COVER MESSAGE

Attached is a request made under the Freedom of Information Act by Freedom Watch, Inc., through its chairman and general counsel, Larry Klayman. The request is eight (8) pages in length, including one exhibit labeled as "Exhibit A."



## FAX COVER SHEET

TO	FBIFOI/PAResult
COMPANY	
FAXNUMBER	15408684997
FROM	Larry Klayman
DATE	2018-01-03 00:49:08 GMT
RE	UNKNOWN

### COVER MESSAGE

Attached is a Freedom of Information Act Request by Freedom Watch, Inc. totaling eight (8) pages, with one exhibit labeled as "Exhibit A."

## FAX COVER SHEET

TO	AmandaJones
COMPANY	DOJ Criminal Division FOIA
FAXNUMBER	12025146117
FROM	Larry Klayman
DATE	2018-01-03 01:07:26 GMT
RE	Freedom of Information Act Request

### COVER MESSAGE

Attached is a Freedom of Information Act Request by Freedom Watch, Inc.

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<input type="checkbox"/>	Subject	Sent	Recipient	Status
<input type="checkbox"/>	Successful transmission to 12025146117. Re: Freedom of Information Act Req...	1/3/2018 1:18 AM	12025146117	Completed
<input type="checkbox"/>	Successful transmission to 15408684997. Re: UNKNOWN	1/3/2018 12:55 AM	15408684997	Completed
<input checked="" type="checkbox"/>	Unsuccessful fax transmission to 12025146617. Re: Freedom of Information A...	1/3/2018 12:47 AM	12025146617	Failed
<input checked="" type="checkbox"/>	Unsuccessful fax transmission to 15408684391. Re: Freedom of Information A...	1/3/2018 12:41 AM	15408684391	Failed
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<input type="checkbox"/>	Successful transmission to 12025141009. Re: Freedom of Information Act Req...	1/3/2018 12:39 AM	12025141009	Completed

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771125163186

Ship date:

Tue 1/02/2018

Larry Klayman  
Suite 345  
2020 Pennsylvania Ave.  
Washington, DC US 20006  
310 595-0800



Delivered

Signed for by: J.PITZER



Actual delivery:

Wed 1/03/2018 10:08 am

FBI  
FOI/PA Request  
170 Marcel Drive  
WINCHESTER, VA US 22602  
540 868-4391

Travel History

▲ Date/Time	Activity	Location
- 1/03/2018 - Wednesday		
10:08 am	Delivered	WINCHESTER, VA
9:19 am	On FedEx vehicle for delivery	WINCHESTER, VA
9:14 am	At local FedEx facility	WINCHESTER, VA
6:45 am	At destination sort facility	DULLES, VA
4:12 am	Departed FedEx location	MEMPHIS, TN
12:57 am	Arrived at FedEx location	MEMPHIS, TN
- 1/02/2018 - Tuesday		
6:06 pm	Left FedEx origin facility	INGLEWOOD, CA
6:04 pm	Shipment information sent to FedEx	
5:03 pm	Picked up	INGLEWOOD, CA

Shipment Facts

Tracking Number	771125163186	Service	FedEx Priority Overnight
Delivery attempts	1	Delivered To	Shipping/Receiving
Total pieces	1	Terms	Not Available
Packaging	FedEx Envelope	Special handling section	Deliver Weekday
Standard transit ?	1/03/2018 by 12:00 pm		

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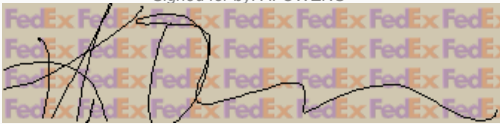
Tue 1/02/2018

Larry Klayman  
Suite 345  
2020 Pennsylvania Ave.  
Washington, DC US 20006  
310 595-0800



Delivered

Signed for by: A. OWENS



Actual delivery:

Wed 1/03/2018 10:08 am

FOIA/ PA Mail Referral Unit  
FedEx World Service Center  
1501 ECKINGTON PLACE NORTHEAST  
WASHINGTON, DC US 20002

Travel History

Date/Time	Activity	Location
1/03/2018 - Wednesday		
10:08 am	Delivered	WASHINGTON, DC
	Delivered to recipient at FedEx World Service Center	
8:42 am	Held at location for recipient pickup	WASHINGTON, DC
	Package available for pickup at FedEx World Service Center: 1501 ECKINGTON PLACE NORTHEAST	
8:08 am	At local FedEx facility	WASHINGTON, DC
6:45 am	At destination sort facility	DULLES, VA
4:12 am	Departed FedEx location	MEMPHIS, TN
12:57 am	Arrived at FedEx location	MEMPHIS, TN
1/02/2018 - Tuesday		
6:06 pm	Left FedEx origin facility	INGLEWOOD, CA
6:04 pm	Shipment information sent to FedEx	
5:03 pm	Picked up	INGLEWOOD, CA

Shipment Facts

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Service	FedEx Priority Overnight	Delivery attempts	1
Delivered To	FedEx Location	Total pieces	1
Terms	Not Available	Packaging	FedEx Envelope
Special handling section	Hold at Location	Standard transit	1/03/2018 by 9:00 am

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771125125987

Ship date:

Tue 1/02/2018

Larry Klayman  
Suite 345  
2020 Pennsylvania Ave.  
Washington, DC US 20006  
310 595-0800



Delivered

Signed for by: M.MCGIRT



Actual delivery:

Wed 1/03/2018 9:54 am

Office of Information Policy  
Laurie Day  
#11050  
1425 New York Ave  
WASHINGTON, DC US 20530  
202 514-1009

Travel History

▲ Date/Time	Activity	Location
- 1/03/2018 - Wednesday		
9:54 am	Delivered	WASHINGTON, DC
9:47 am	Delivery exception	WASHINGTON, DC
	Customer not available or business closed	
8:19 am	On FedEx vehicle for delivery	WASHINGTON, DC
8:16 am	At local FedEx facility	WASHINGTON, DC
8:13 am	At local FedEx facility	WASHINGTON, DC
6:45 am	At destination sort facility	DULLES, VA
4:12 am	Departed FedEx location	MEMPHIS, TN
12:57 am	Arrived at FedEx location	MEMPHIS, TN
- 1/02/2018 - Tuesday		
6:06 pm	Left FedEx origin facility	INGLEWOOD, CA
5:54 pm	Shipment information sent to FedEx	
5:03 pm	Picked up	INGLEWOOD, CA

Shipment Facts

Tracking Number	771125125987	Service	FedEx Priority Overnight
Delivery attempts	1	Delivered To	Receptionist/Front Desk
Total pieces	1	Terms	Not Available
Packaging	FedEx Envelope	Special handling section	Deliver Weekday
Standard transit	1/03/2018 by 10:30 am		

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771125117875

Ship date:

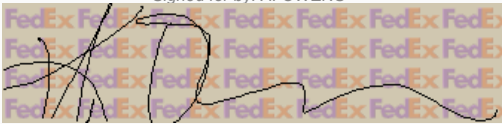
Tue 1/02/2018

Larry Klayman  
Suite 345  
2020 Pennsylvania Ave.  
Washington, DC US 20006  
310 595-0800



Delivered

Signed for by: A. OWENS



Actual delivery:

Wed 1/03/2018 10:08 am

Robert Mueller  
FedEx World Service Center  
1501 ECKINGTON PLACE NORTHEAST  
WASHINGTON, DC US 20002

Travel History

▲ Date/Time	Activity	Location
- 1/03/2018 - Wednesday		
10:08 am	Delivered	WASHINGTON, DC
	Delivered to recipient at FedEx World Service Center	
8:41 am	Held at location for recipient pickup	WASHINGTON, DC
	Package available for pickup at FedEx World Service Center: 1501 ECKINGTON PLACE NORTHEAST	
8:13 am	At local FedEx facility	WASHINGTON, DC
6:45 am	At destination sort facility	DULLES, VA
4:12 am	Departed FedEx location	MEMPHIS, TN
12:57 am	Arrived at FedEx location	MEMPHIS, TN
- 1/02/2018 - Tuesday		
6:06 pm	Left FedEx origin facility	INGLEWOOD, CA
5:54 pm	Shipment information sent to FedEx	
5:03 pm	Picked up	INGLEWOOD, CA

Shipment Facts

Tracking Number	771125117875	Recipient address	Robert Mueller, 950 Pennsylvania Ave, #3266, WASHINGTON, 20530, DC, US
Service	FedEx Priority Overnight	Delivery attempts	1
Delivered To	FedEx Location	Total pieces	1
Terms	Not Available	Packaging	FedEx Envelope
Special handling section	Hold at Location	Standard transit	1/03/2018 by 9:00 am

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771125143574

Ship date:

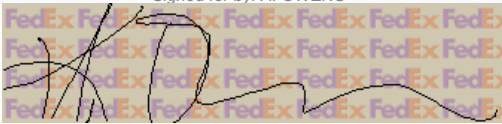
Tue 1/02/2018

Larry Klayman  
Suite 345  
2020 Pennsylvania Ave.  
Washington, DC US 20006  
310 595-0800



Delivered

Signed for by: A. OWENS



Actual delivery:

Wed 1/03/2018 10:08 am

Amanda Jones  
FedEx World Service Center  
1501 ECKINGTON PLACE NORTHEAST  
WASHINGTON, DC US 20002

Travel History

Date/Time	Activity	Location
1/03/2018 - Wednesday		
10:08 am	Delivered	WASHINGTON, DC
	Delivered to recipient at FedEx World Service Center	
8:41 am	Held at location for recipient pickup	WASHINGTON, DC
	Package available for pickup at FedEx World Service Center: 1501 ECKINGTON PLACE NORTHEAST	
8:13 am	At local FedEx facility	WASHINGTON, DC
6:45 am	At destination sort facility	DULLES, VA
4:12 am	Departed FedEx location	MEMPHIS, TN
12:57 am	Arrived at FedEx location	MEMPHIS, TN
1/02/2018 - Tuesday		
6:06 pm	Left FedEx origin facility	INGLEWOOD, CA
6:04 pm	Shipment information sent to FedEx	
5:03 pm	Picked up	INGLEWOOD, CA

Shipment Facts

Tracking Number	771125143574	Recipient address	Amanda Jones, 950 Pennsylvania Ave, Keeney Building #1127, WASHINGTON, 20530, DC, US
Service	FedEx Priority Overnight		
Delivered To	FedEx Location	Delivery attempts	1
Terms	Not Available	Total pieces	1
Special handling section	Hold at Location	Packaging	FedEx Envelope
		Standard transit	1/03/2018 by 9:00 am

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