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***VIA FACSIMILE AND U.S. MAIL***

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**Re: FREEDOM OF INFORMATION ACT REQUEST.**

Dear Ladies and Gentlemen:

Pursuant to the Freedom of Information Act (“FOIA”) (5 U.S.C. § 552) and the regulations promulgated thereunder, Freedom Watch, Inc. (“Freedom Watch”) requests that that the U.S. Department of Justice (“DOJ”), the U.S. Department of Justice Criminal Division (“DOJCD”), and the Federal Bureau of Prisons (“FBP”) produce any and all documents that refer or relate in anyway to the specific request set forth below.



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

Freedom Watch requests that the DOJ, DOJCD and FBP provide the requested documents within ten (10) calendar days from receipt of this request.

## DEFINITION

For the purposes of this Freedom of Information Act 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, statements, audits, list of names, applications, diskettes, expense logs and receipts, calendar or diary logs, folders, files, books, manuals, pamphlets, drawings, charts, photographs, records, orders, plans, proposals, meeting agendas, minutes of meetings, briefing materials, 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, telephone records, tape recordings, and other documents and things.

For the purposes of this FOIA request, DOJ, DOJCD and FBP are to search and produce any responsive documents or records that are within its possession, custody, or control regardless of who authored or created the document or record.

For the purpose 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.

Freedom Watch hereby requests that the DOJ, DOJCD and FBP as a whole produce all documents which refer or relate in any way to the specific request stated below:

- 1. Any and all documents and records that refer or relate in any way to the death of Jeffrey Epstein.**
- 2. Any and all documents and records that refer or relate in any way to the former President Bill Clinton, former Secretary of State Hillary Clinton and/or Jeffrey Epstein.**



3. Any and all documents and records that refer or relate in any way to Mafia connections of former President Bill Clinton, former Secretary of State Hillary Clinton and/or Jeffrey Epstein.

4. Any and all documents and records that refer or relate in any way to opening an investigation into the death of Jeffery Epstein.

## LEGAL REQUIREMENTS

Both the Obama and Trump Administrations have announced their policies of compliance with Freedom of Information Act requests and directed Federal agencies to comply with the following policy: “President Obama and Attorney General Holder have directed agencies to apply a presumption of openness in responding to FOIA requests. The Attorney General specifically called on agencies not to withhold information just because it technically falls within an exception and he also encouraged agencies to make discretionary releases of records. The Attorney General emphasized that the President has called on agencies to work in a spirit of cooperation with FOIA requesters. The Office of Information Policy at the Department of Justice oversees agency compliance with these directives and encourages all agencies to **fully comply with both the letter and the spirit of the FOIA. President Obama has pledged to make this the most transparent Administration in history.**” (emphasis added) <https://www.justice.gov/usao/resources/making-foia-request/foia-frequently-asked-questions>.

Similarly, President Clinton instructed agencies in October 1993 to ensure compliance with both the spirit and the letter of the Act. *See* President Clinton’s FOIA Memorandum, U.S. Department of Justice, FOIA Update, Summer/Fall 1993, at 3.

In addition, Attorney General Reno issued a FOIA Memorandum in October 1993 which *inter alia* states, “I strongly encourage your FOIA officers to make ‘discretionary disclosures’ whenever possible under the Act,” and orders “as presumption of disclosure.” *See* Attorney General Reno’s FOIA Memorandum, U.S. Department of Justice, FOIA Update, Spring 1994, at 1-2.

If any responsive record or portion thereof is claimed to be exempt from production under FOIA or District of Columbia Official Code § 2-531 *et seq.*, sufficient identifying information (with respect to each allegedly exempt record or portion thereof) must be provided to allow the assessment of the propriety of the claimed exemption. *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973), *cert denied*, 415 U.S. 977 (1974). Additionally, pursuant to law, any reasonably segregable portion of a responsive record must be provided after redaction of any allegedly exempt material. 5 U.S.C. § 552(b).

If any documents are withheld subject to any claim of privilege, Freedom Watch requests 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.

## **REQUEST FOR FEE WAIVER**

Freedom Watch requests a blanket waiver on behalf of the public interest, to which it is entitled under 5 U.S.C. § 552(a)(4)(A)(iii); *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, Inc.'s request for fee waiver with regard to all responsive documents in proceeding).

Freedom Watch is a non-profit, non-partisan, tax-exempt 501(c)(3) organization that as a public interest law firm specializes in deterring, monitoring, uncovering, and addressing public corruption in government. Freedom Watch 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 [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).), Youtube, Roku, Amazon Fire, Twitter, and appearances on other radio shows and cable news networks such as Fox News, One America News Network, i24, and Newsmax. Freedom Watch's chairman and general counsel, Larry Klayman, also has a published column at [www.wnd.com](http://www.wnd.com) and has a blog named "Klayman's Court" at Newsmax, among other forms of public dissemination of information to educate the citizenry. The disclosure of this information is in the public interest because it is likely to contribute significantly to public understanding of the operations and activities of the government and is not primarily in the commercial interest of Freedom Watch.

The requester has 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 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. Freedom watch disseminates into the public through its website [www.freedomwatchusa.org](http://www.freedomwatchusa.org), the U.S. mails and on the Internet.

The subject of this request is information concerning the operations and activities of the government. Past experience of Freedom Watch demonstrates its success in uncovering



important facts about government activities, integrity and operations, of broad concern to the public. Thus, Freedom Watch's 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. Freedom Watch's capabilities and effectiveness are a matter of public record.

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 the information and time is truly of the essence in this matter.

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  
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Chairman and General Counsel