



CITIZENS FOR  
RESPONSIBILITY &  
ETHICS IN WASHINGTON

July 25 , 2025

Joo Y. Chung  
Chief FOIA Officer  
OSD/JS FOIA Requester Service Center, Office of Freedom of Information  
Department of Defense  
1155 Defense Pentagon  
Washington, DC 20301-1155

**Re: Freedom of Information Act Request**

Dear FOIA Officer:

Citizens for Responsibility and Ethics in Washington ("CREW") submits this request for records pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, and Department of Defense ("DOD") regulations.

Specifically, CREW requests:

1. All communications sent or received by Acting General Counsel (Acting GC) Charles Young, from March 28, 2025 through March 31, 2025, inclusive.
2. All phone records of Acting GC Young, from March 28, 2025 through March 31, 2025, inclusive, including incoming and outgoing phone calls on any DOD-issued device.
3. Calendars of Acting GC Young from March 28, 2025 through March 31, 2025, inclusive.

Please search for responsive records regardless of format, medium, or physical characteristics. We seek records of any kind, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical material. Our request includes without limitation all correspondence, letters, emails, text messages, facsimiles, telephone messages, voice mail messages, and transcripts, notes, or minutes of any meetings, telephone conversations, or discussions. Our request also includes any attachments to emails and other records, and anyone who was cc'ed or bcc'ed on any emails.

If it is your position any portion of the requested records is exempt from disclosure, CREW requests that you provide it with an index of those documents as required under *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). If some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt

portions of the requested records. *See* 5 U.S.C. § 552(b). If it is your position that a document contains non-exempt segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the document. *See Mead Data Central v. U.S. Dep't of the Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

Please be advised that CREW intends to pursue all legal remedies to enforce its rights under FOIA. Accordingly, because litigation is reasonably foreseeable, the agency should institute an agencywide preservation hold on all documents potentially responsive to this request.

### **Fee Waiver Request**

In accordance with 5 U.S.C. § 552(a)(4)(A) and agency regulations, CREW requests a waiver of fees associated with processing this request for records. The subject of this request concerns the operations of the federal government, and the disclosures likely will contribute to a better understanding of relevant government procedures by CREW and the general public in a significant way. *See id.* § 552(a)(4)(A)(iii). Moreover, the request primarily and fundamentally is for non-commercial purposes. *See, e.g., McClellan Ecological v. Carlucci*, 835 F.2d 1282, 1285 (9th Cir. 1987).

On June 24, 2025, former Acting Deputy Director for the Office of Immigration Litigation of the Department of Justice, Erez Reuveni, submitted a protected whistleblower disclosure to the Department of Justice Office of the Inspector General, the Office of Special Counsel, and the Senate and House Committees on the Judiciary.<sup>1</sup> The whistleblower disclosure alleged misconduct by high-ranking officials across several executive branch agencies between March 14 and April 5, 2025.<sup>2</sup> Mr. Reuveni alleges that officials at DOJ and the Department of Homeland Security (DHS) may have attempted to intentionally defy court orders by conducting unlawful removal operations.<sup>3</sup> This FOIA request seeks records that will enable the public to verify the accuracy of Mr. Reuveni's disclosure and determine whether senior government officials deliberately and unlawfully violated their legal responsibilities. The requested records are needed to substantiate the ongoing legal and oversight processes connected to Mr. Reuveni's whistleblower disclosure.

According to Mr. Reuveni's disclosure, Acting GC Young explicitly referenced DHS Acting General Counsel Joseph Mazzara as a point of contact for removal flight operations. Mr. Young's statement to Mr. Reuveni is inconsistent with Mr. Mazzara's claim to Mr. Reuveni that he had no knowledge of flight removal operations. Furthermore, Mr. Young told Mr. Reuveni that DHS had not communicated the existence of the injunction with any DOD official prior to the flight removals, despite Mr. Reuveni's assertion that Mr. Mazzara was

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<sup>1</sup> Government Accountability Project, *Protected Whistleblower Disclosure of Erez Reuveni Regarding Violation of Laws, Rules & Regulations, Abuse of Authority, and Substantial and Specific Danger to Health and Safety at the Department of Justice* (June 24, 2025) at 1, [https://www.judiciary.senate.gov/imo/media/doc/06-24-2025\\_-\\_Protected\\_Whistleblower\\_Disclosure\\_of\\_Erez\\_Reuveni\\_Redacted.pdf](https://www.judiciary.senate.gov/imo/media/doc/06-24-2025_-_Protected_Whistleblower_Disclosure_of_Erez_Reuveni_Redacted.pdf) ("Reuveni Disclosure").

<sup>2</sup> Reuveni Disclosure at 1.

<sup>3</sup> Reuveni Disclosure at 1.

aware of the injunction.<sup>4</sup> The purpose of this request is to help the public more fully understand whether the executive branch has complied with, or deliberately defied, court orders.

The public has an urgent and substantial interest in understanding whether high-ranking officials entrusted with enforcing the law have instead chosen to disregard it. The disclosure of the records requested here can help build that understanding. Mr. Reuveni's disclosure alleges that senior officials abused their authority and undermined the rule of law by intentionally misleading courts, defying judicial orders, and improperly restricting employee communications. Such misconduct, if true, may have violated federal law and would severely breach the public's trust in its government. The public has a compelling interest in learning whether senior DOJ and DHS officials have complied with the law and with court orders, especially when the due process rights of noncitizens are at stake. Timely access to these records is necessary to allow Congress to conduct necessary oversight. Furthermore, informed public scrutiny is essential for elected officials to remain accountable to the people they serve.

CREW is a non-profit corporation, organized under section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the public's right to be aware of the activities of government officials, to ensuring the integrity of those officials, and to highlighting and working to reduce the influence of money on politics. CREW uses a combination of research, litigation, and advocacy to advance its mission. CREW intends to analyze the information responsive to this request and to share its analysis with the public through reports, press releases, or other means. In addition, CREW will disseminate any documents it acquires from this request to the public through its website, [www.citizensforethics.org](http://www.citizensforethics.org). The release of information obtained through this request is not in CREW's financial interest.

CREW further requests that it not be charged search or review fees for this request pursuant to 5 U.S.C. § 552(a)(4)(A)(ii)(II) because CREW qualifies as a member of the news media. See *Nat'l Sec. Archive v. U.S. Dep't of Defense*, 880 F.2d 1381, 1386 (D.C. Cir. 1989) (holding non-profit a "representative of the news media" and broadly interpreting the term to include "any person or organization which regularly publishes or disseminates information to the public").

CREW routinely disseminates information obtained through FOIA to the public in several ways. For example, CREW's website receives over 150,000 page views every month. The website includes blogposts that report on and analyze newsworthy developments regarding government ethics, corruption, and money in politics, as well as numerous reports CREW has published to educate the public about these issues. These reports frequently rely on government records obtained through FOIA. CREW also posts the documents it obtains through FOIA on its website.

Under these circumstances, CREW satisfies fully the criteria for a fee waiver.

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<sup>4</sup> Reuveni Disclosure at 20.

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### **Conclusion**

If you have any questions about this request or foresee any problems in fully releasing the requested records, please email me at [sheymann@citizensforethics.org](mailto:sheymann@citizensforethics.org) and [foia@citizensforethics.org](mailto:foia@citizensforethics.org) or call me at (202) 408-5565. Also, if CREW's request for a fee waiver is denied, please contact our office immediately upon making such a determination.

Where possible, please produce records in electronic format. Please send the requested records to [sheymann@citizensforethics.org](mailto:sheymann@citizensforethics.org) and [foia@citizensforethics.org](mailto:foia@citizensforethics.org) or by mail to Sacha Heymann, Citizens for Responsibility and Ethics in Washington, P.O. Box 14596, Washington, D.C. 20044.

Sincerely,

Sacha Heymann  
Policy Fellow