

August 6, 2026

Andrew Fiorillo
Chief, Initial Request Staff
Office of Information Policy
6th Floor
441 G Street NW
Washington, DC 20530

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 Justice ("DOJ") regulations.

Specifically, CREW requests, from February 5, 2025 to the date this request is processed:

1. All electronic communications sent or received in the course of conducting government business on any non-official electronic messaging account or platform belonging to, controlled by, or used by former Attorney General Pamela Bondi.

Such 'non-official electronic messaging accounts' include all email, instant messaging, direct messaging, and social media accounts, Twitter, X, Signal, Truth Social, WhatsApp, and any other means of electronic communications other than official accounts controlled by the federal government.

2. Records sufficient to show all formal or informal policies, determinations or conclusions (including underlying memoranda) concerning former Attorney General Bondi's actual or potential use of non-official electronic messaging accounts in the course of conducting government business.

The above request excludes agency records consisting solely of news articles, press clippings, and other publicly-available material, so long as the records include no accompanying discussion by agency officials.

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).

Federal law specifically prohibits officers and employees of federal agencies from creating or sending records “using a non-official electronic messaging account unless” they contemporaneously copy an official account when transmitting the message or forward the message to an official account within 20 days. 44 U.S.C. § 2911. These requirements apply to text messages, as “[t]ext messages about official acts are considered records that should be preserved.”¹ See *id.* §§ 2911(c)(1), 3301(a)(1)(A). The Federal Records Act (“FRA”) further “strictly limits the circumstances under which records can be removed from federal custody or destroyed.”² NARA regulations outline that “[t]he penalties for the unlawful or accidental removal, defacing, alteration, or destruction of Federal records or the attempt to do so, include a fine, imprisonment, or both.” 36 C.F.R. § 1230.12 (citing 18 U.S.C. §§ 641, 2071). Described in more detail below, there is an urgency to inform the public of any apparent failure to preserve or any deletion of federal records created by former Attorney General Bondi on Signal or any other non-official messaging platform.

¹ Jeffrey Goldberg, *The Trump Administration Accidentally Texted Me Its War Plans*, Atlantic (Mar. 24, 2025), <https://www.theatlantic.com/politics/archive/2025/03/trump-administration-accidentally-texted-me-its-war-plans/682151/>.

² *Judicial Watch, Inc. v. Kerry*, 844 F.3d 952, 953 (D.C. Cir. 2016) (citing 44 U.S.C. § 3105(1)).

On June 10, 2026, it was publicly reported that Attorney General Bondi “rarely used her Justice Department email” when she served as Attorney General.³ In an age in which virtually all written communication is conducted on electronic systems and email use is ubiquitous to communicate and transmit documents, and considering the wide range of important matters committed by law to the Attorney General, this reporting raises significant concerns regarding (1) whether Ms. Bondi used alternative and non-official methods of communication to conduct official business as Attorney General and (2) whether such records were preserved in compliance with the FRA.

The records CREW seeks will contribute to CREW’s and the public’s understanding of whether the former attorney general resorted to the use of non-official communications in her crucial role, failed to preserve federal records, or otherwise circumvented established agency programs of records management. Given that Ms. Bondi “rarely used” her official DOJ email account, these disclosures may also shed light on which non-official accounts she elected to use instead, whether she took any steps to ensure those records were preserved pursuant to NARA’s mandatory duties under the FRA and other applicable statutes, and whether sensitive government information was shared with or exposed to third parties.⁴

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. 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

³ Maggie Haberman & Jonathan Swan, *Inside the White House Freakout Over the Epstein Files*, N.Y. Times (June 10, 2026), https://www.nytimes.com/2026/06/10/magazine/trump-epstein-files-white-house-vance-doj.html?eafs_enabled=false.

⁴ *See id.*; *see, e.g.*, 44 U.S.C. §§ 3106, 2905(a); 36 C.F.R. §§ 1230.14, 1230.16; *Judicial Watch, Inc. v. Kerry*, 844 F.3d 952, 956 (D.C. Cir. 2016).

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.

Expedited Processing Request

CREW requests expedited processing of this request, pursuant to 5 U.S.C. § 552 and 28 C.F.R. § 16.5(e). CREW is entitled to expedited processing because (1) there is “[a]n urgency to inform the public about an actual or alleged Federal Government activity” and (2) CREW is “primarily engaged in disseminating information,” 28 C.F.R. § 16.5(e)(1)(ii).

(1) CREW is primarily engaged in disseminating information to the public

CREW is “primarily engaged in disseminating information” to the public, as most recently confirmed by the Court in *Citizens for Responsibility and Ethics in Washington v. U.S. Department of Justice* (“CREW v. DOJ”), No. 25-4426, 2026 WL 472589, at *10 (D.D.C. Feb. 19, 2026). This “standard ‘requires that information dissemination be the main [and not merely an incidental] activity of the requestor,’ but ‘publishing information ‘need not be [the organization’s] sole occupation.’” *Protect Democracy Project, Inc. v. U.S. Dep’t of Def.*, 263 F. Supp. 3d 293, 298 (D.D.C. 2017). 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. CREW is a credible requestor and disseminator of information often relied on by major media outlets.⁵

(2) There is an urgency to inform the public about an actual or alleged Federal Government activity

As described in the Fee Waiver Request above, it has been publicly reported that Attorney General Bondi “rarely used her Justice Department email,” raising a host of issues regarding how the former Attorney General conducted government business and whether she complied with federal record keeping laws.⁶ This recent reporting comes in the wake of multiple high-profile, embarrassing, and troubling examples of the President and other White House officials conducting sensitive government business on private electronic

⁵ See, e.g., *Citizens for Responsibility and Ethics in Washington*, N.Y. Times, <https://www.nytimes.com/topic/citizens-for-responsibility-and-ethics-in-washington> (last visited July 7, 2026) (list of numerous New York Times articles referencing CREW spanning over a decade); Ed Pilkington and Dharna Noor, *Top US ethics watchdog investigating Trump over dinner with oil bosses*, The Guardian (May 15, 2024), <https://www.theguardian.com/us-news/article/2024/may/15/ethics-watchdog-investigating-trump-big-oil> (referring to CREW as “Top US ethics watchdog”).

⁶ Haberman & Swan, *supra* note 3.

applications like Truth Social and Signal.⁷ For example, on September 20, 2025, President Trump publicly posted a Truth Social message, which was later reported to be an intended private message, to Ms. Bondi demanding that she be more aggressive in using the DOJ to criminally prosecute the President's perceived enemies.⁸

Similarly, from March 11 to March 15, 2025, Vice President JD Vance, Chief of Staff for the National Security Council Brian McCormack, National Security Advisor Mike Waltz, White House Deputy Chief of Staff for Policy Stephen Miller, and White House Chief of Staff Susie Wiles, in addition to multiple cabinet secretaries and other officials, participated in a group chat on Signal, in which the group discussed impending military operations in Yemen, including attack plans, putting America's war plans and the welfare of members of the United States armed forces at risk.⁹ Some of the messages in the Signal group were reportedly set to disappear after one week, while others were set to disappear after four weeks.¹⁰ The Signal chat only came to light because they also inadvertently included the editor-in-chief of The Atlantic magazine.¹¹ Former National Archives and Records Administration director of litigation Jason Baron told reporters that "all government employees are prohibited from using electronic-messaging applications such as Signal for official business" under applicable federal records laws.¹²

Most recently, on June 29, 2026, it was publicly reported that some of President Trump's top advisors continued to use Signal even after the president publicly condemned its use in an April 24, 2025 interview saying, "If you want to know the truth. I would frankly tell these people not to use Signal."¹³ Just ten days after this interview, President Trump's then-special envoy for Latin America, Mauricio Claver-Carone, was texting in a Signal group

⁷ Kyle Cheney, *'We Can't Delay Any Longer': Trump Urges Bondi to Prosecute His Rivals*, Politico (Sept. 20, 2025), <https://www.politico.com/news/2025/09/20/trump-bondi-truth-social-00574380>; Kristen Welker & Rebecca Shabad, *Trump Accidentally Posted Message Pressuring Pam Bondi to Charge His Enemies, Source Says*, NBC News (Oct. 10, 2025), <https://perma.cc/LJ28-ZDMV>; Goldberg, *supra* note 1.

⁸ Cheney, *supra* note 7; Welker & Shabad, *supra* note 7.

⁹ Goldberg, *supra* note 1; Jeffrey Goldberg & Shane Harris, *Here are the Attack Plans That Trump's Advisers Shared on Signal*, Atlantic (Mar. 26, 2025), <https://www.theatlantic.com/politics/archive/2025/03/signal-group-chat-attack-plans-hegseth-goldberg/682176/>; Dep't of Def. Off. of Inspector Gen., *Evaluation of the Secretary of Defense's Reported Use of a Commercially Available Messaging Application for Official Business* (Dec. 2, 2025), <https://www.politico.com/f/?id=0000019a-ea21-dd9e-afba-fa6d21b50000>; Owen Scott, *JD Vance Texted in Hegseth's Infamous Signalgate Group at 2:30am After Scandal Broke*, Independent (Dec. 5, 2025), <https://www.independent.co.uk/news/world/americas/us-politics/jd-vance-hegseth-signal-chat-houthi-yemen-b2878815.html>.

¹⁰ Goldberg, *supra* note 1.

¹¹ See *id.*

¹² Goldberg, *supra* note 1.

¹³ See Michael Scherer, Missy Ryan, Nancy A. Youssef, & Shane Harris, *Hegseth, Rubio, and Caine Had an Auto-Deleting Signal Chat*, The Atlantic (June 29, 2026), https://www.theatlantic.com/national-security/2026/06/trump-administration-signal-chat-marco-rubio/687735/?gift=SCYx-5scVta3-cr_lIlgTyTi4ImrUbPLjByL_AyLRx5g.

chat with Secretary of State Marco Rubio and Rubio's then-counselor, Mike Needham.¹⁴ According to recently released State Department records, the men had been conversing on Signal since as early as April 15, 2025.¹⁵ The same State Department release includes "13 Signal chats from the first six months of 2025 that have not been previously reported."¹⁶ Additionally, the identities of nearly all of the group members in the chats are visible in the release, "revealing even broader use of Signal by top Trump-administration officials than was previously known."¹⁷ Also visible are the names of the groups themselves, including one named "Iran/Ukraine Planning" and another labeled "State USAID."¹⁸

The repeated use of Signal and other private messaging applications by the highest placed officials within the Trump administration—including to communicate with Attorney General Bondi—coupled with Attorney General Bondi's reported avoidance of using her email, creates an urgent public need to understand the extent to which Attorney General Bondi used non-official messaging systems to conduct government business.

That urgency is only enhanced by Attorney General Bondi's troubling history of violating public disclosure laws prior to her appointment as Attorney General. While serving as Attorney General of Florida, Ms. Bondi was sued for allegedly "conspir[ing with Governor Rick Scott and his staff] to shield their communications from public-records law by using private Gmail accounts to send mail,"¹⁹ destroying emails, and "fail[ing] to properly retain text messages" even after the plaintiff had filed a document hold request.²⁰ Attorney General Bondi was similarly sued after her office allegedly refused to provide meeting notes stored by Bondi on her iPad.²¹ In 2015, Governor Scott and the state of Florida agreed to pay \$700,000 to settle these lawsuits and several others that also contended that Governor Scott and other state officials "flouted Florida's public records law."²² Regarded as "one of the larger payments ever approved in an open government case in Florida history," the six-figure

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ *Id.*

¹⁸ *Id.*

¹⁹ See Jacob Gershman, *Florida Governor Settles Lawsuit Alleging Conspiracy to Shield Email*, Wall Street Journal (Aug. 7, 2015), <https://www.wsj.com/articles/BL-LB-51867>.

²⁰ See *id.*; see Mary Ellen Klas, *Attorney says missing emails prove Attorney General Pam Bondi's office violated records laws*, Tampa Bay Times (Apr. 4, 2014), <https://www.tampabay.com/news/politics/legislature/lawyer-accuses-attorney-general-pam-bondis-office-of-destroying-public/2173636/>.

²¹ The Associated Press, *Governor Scott and attorney general sued for not turning over records*, The Florida Times-Union (Nov. 23, 2013), <https://www.jacksonville.com/story/news/2013/11/25/governor-scott-and-attorney-general-sued-not-turning-over-records/15805889007/>; Reporters Committee, *RCFP reviews Pam Bondi's record on newsgathering, First Amendment issues*, Reporters Committee for Freedom of the Press (Jan. 27, 2025), <https://www.rcfp.org/pam-bondi-ag-special-analysis/>.

²² *Florida to Spend \$700K to Settle Public Records Lawsuit*, NBC 6 South Florida (Aug. 8, 2015), <https://www.nbcmiami.com/news/local/florida-to-spend-700k-to-settle-public-records-lawsuits/54435/>.

settlement was paid out through the use of taxpayer money that came from Governor Scott's office, Ms. Bondi's office, and two other state agencies.²³

In short, Attorney General Bondi created her own track record of non-compliance with public records and transparency laws prior to being appointed Attorney General, and both the conduct of Trump administration and public reporting indicate that such non-compliance may have continued during her federal service, where she conducted extremely consequential and sensitive work on behalf of the American people. It is imperative that CREW receives these records on an expedited basis in order to inform the public of whether Attorney General Bondi used non-official electronic messaging systems in violation of federal law and at the risk of compromising sensitive information.

Conclusion

If you have any questions about this request or foresee any problems in fully releasing the requested records, please email me at [REDACTED] and foia@citizensforethics.org or call me at [REDACTED]. 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 [REDACTED] and foia@citizensforethics.org or by mail to Kayvan Farchadi, Citizens for Responsibility and Ethics in Washington, P.O. Box 14596, Washington, D.C. 20044.

Sincerely,

/s/ Kayvan Farchadi
Senior Counsel

²³ *Id.*; Gary Fineout, *Gov. Rick Scott defends payout in records lawsuit*, Florida Politics (Aug. 20, 2015), <https://floridapolitics.com/archives/188701-gov-rick-scott-defends-payout-in-records-lawsuit/>.