



March 27, 2023

Via Electronic Mail: FOIL@dany.nyc.gov

Office of the General Counsel, Civil Litigation Unit
New York County District Attorney's Office
One Hogan Place, New York, NY 10013
Attn: Records Access Officer

Freedom of Information Law Request: Communications Regarding Donald J. Trump

Dear Sir/Madam:

America First Legal Foundation (“AFL”) is a national, nonprofit legal foundation working to promote the rule of law, prevent executive overreach, protect due process and equal protection, and educate Americans about the individual rights guaranteed under the Constitution and laws of the United States. Our mission includes promoting government transparency and accountability by gathering official information, analyzing it, and disseminating it through reports, press releases, and media, including social media platforms, all to educate the public and to keep government officials accountable for their duty to faithfully execute, protect, and defend the Constitution and laws of the United States.

To shed light on government operations and decision-making, we file Freedom of Information requests on issues of pressing public concern, then disseminate the information we obtain, making documents broadly available to the public, scholars, and the media. Using our editorial skills to turn raw materials into distinct work, we distribute that work to a national audience through traditional and social media platforms. AFL’s email list contains over 55,000 unique addresses, our Twitter page has 63,700 followers, the Twitter page of our Founder and President has over 422,6800 followers, our Facebook page has 120,000 followers, and we have another 31,700 followers on GETTR.

I. Custodians

- A. Alvin Bragg
- B. Cyrus Vance
- C. Meg Reiss
- D. Brian Crow

611 Pennsylvania Ave SE #231
Washington, DC 20003

320 South Madison Avenue
Monroe, Georgia 30655

- E. Lisa DelPizzo
- F. Leslie Dubeck
- G. Gloria Garcia
- H. Susan Hoffinger
- I. Peter Pope
- J. Jordan Stockdale
- K. Chanterelle Sung

II. Requested Records

Pursuant to the New York Freedom of Information Law, N.Y. Pub. Off. Law § 86 et seq., AFL requests disclosure of the following records:

- A. All internal communications—via email, SMS text, Signal, WhatsApp, or other messaging platforms—mentioning or regarding Donald J. Trump.
- B. All emails, SMS text, Signal, WhatsApp, or other communications on similar messaging platforms mentioning or regarding Donald J. Trump with any of the following email domains:
 - 1. @who.eop.gov
 - 2. @usdoj.gov
 - 3. @usss.dhs.gov
 - 4. @nytimes.com
 - 5. @freeandfairlitigation.org
- C. All SMS text, Signal, WhatsApp, or similar communications with any of the following persons:
 - 1. Any person who is a Biden Administration political appointee
 - 2. Any person who is employed by the United States Department of Justice
 - 3. Any person employed by the United States Department of Homeland Security
 - 4. Any person employed by the New York Times
 - 5. Any person on the team of the Free and Fair Litigation Group
- D. All emails, SMS text, Signal, WhatsApp, or other communications with Lanny Davis of the law firm of Davis Goldberg & Galper PLLC and/or the public relations firm Trident DMG.
- E. All records relating to the processing of these items.

The relevant time frame is February 1, 2022, to the date of production.

III. Processing and Production

AFL, as a news media requestor, seeks a waiver of all search and duplication fees. The requested documents will be posted in their entirety on our website and made freely available to the public, and this request is not being made for commercial purposes.

Processing should occur in strict compliance with applicable state laws and regulations. Among other things, you must search the custodians' personal emails and devices. Encrypted messaging does not shield disclosable records from public view.

If you have any questions about our request or believe further discussions regarding search and processing would facilitate more efficient production, then please contact me at FOIA@aflegal.org. Also, if AFL's fee waiver request is not granted in full, please contact us immediately upon making that determination.

To accelerate your release of responsive records, AFL welcomes production on an agreed rolling basis. Please provide responsive records in an electronic format by email. Alternatively, please provide responsive records in native format or in PDF format on a USB drive to America First Legal Foundation, 611 Pennsylvania Ave SE #231, Washington, DC 20003.

Thank you in advance for your cooperation.

Sincerely,

/s/ Reed D. Rubinstein

America First Legal Foundation