

March 17, 2025

VIA EMAIL

U.S. DOGE Service
736 Jackson Place, NW
Washington, DC 20503
USDS@omb.eop.gov

Re: Expedited Freedom of Information Act Request

Dear FOIA Officer(s):

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, and the implementing regulations of your agency, we, Jamie Raskin and Gerald E. Connolly, make the following request for records.

On January 20, 2025, President Trump signed Executive Order 14158, which established the Department of Government Efficiency (DOGE) by reorganizing and renaming the U.S. Digital Service as the U.S. DOGE Service, by creating within that a so-called “U.S. DOGE Service Temporary Organization,” and by establishing “DOGE Teams” within various agencies to implement the President’s “DOGE Agenda.”¹ We seek records with the potential to shed light on DOGE’s operations and actions.

Requested Records

We seek expedited review of this request for the reasons identified below and request that your agency produce the following records as soon as practicable, and no later than twenty (20) business days from the date of this request:

Request 1 - SENSITIVE DATA/AI

1. Records sufficient to identify the name, job title, category of employment,² and level of access³ of all individuals performing the work of the Department of Government Efficiency (DOGE), U.S. DOGE Service (USDS, formerly U.S. Digital Service), and/or U.S. DOGE Service Temporary Organization,

¹ See, e.g., Establishing and Implementing the President’s “Department of Government Efficiency”, Exec. Order No. 14158, 90 Fed. Reg. 8441 (Jan. 20, 2025); Soo Rin Kim, *New Details on Musk’s DOGE Agency Raise Questions About Its Scope, Transparency*, ABC NEWS (Jan. 23, 2025, 8:46 PM), <https://abcnews.go.com/US/new-details-musks-doge-agency-raise-questions-scope/story?id=118046176>.

² Examples of employment categories may include Senior Executive Service, Special Government Employee, permanent career employee, career-conditional employee, etc.

³ Examples of level of access may include, for example, read/write permissions (edit access) and read-only access. See, e.g., Beatrice Nolan, *A 25-Year-Old Staffer with Elon Musk’s DOGE Was Accidentally Given Permission to Edit a Sensitive Treasury Payments System*, FORTUNE (Feb. 13, 2025, 1:30 PM), <https://fortune.com/2025/02/13/a-25-year-old-staffer-with-elon-musks-doge-was-accidentally-given-permission-to-edit-a-sensitive-treasury-payments-system/>.

including employees, personnel, volunteers, and individuals associated with DOGE Agency Teams,⁴ who have been granted access to personally identifiable or sensitive information⁵ or data at or from any federal agency, office, or entity **since January 20, 2025**.

2. For each individual identified in response to part one of this request, records sufficient to identify:
 - a. The training provided to such individuals regarding the requirements for handling personally identifiable or sensitive information or data.
 - b. The specific information or data to which such individuals have been granted access.

For part 2b of this request, we do not request—and this request specifically excludes—the complete sets of information or data responsive to this request. Rather, this request seeks records sufficient to identify this information or data, such as the name of the information or datasets.

- c. The specific purpose for granting such individuals access to that personally identifiable or sensitive information or data.
3. Records sufficient to identify all steps that your agency has taken to protect personally identifiable or sensitive information or data, including records sufficient to identify how those steps have been communicated to each individual identified in response to part one of this request.
4. Records sufficient to identify all databases individuals identified in part one of this request have accessed or copied.

To be clear, part four of this request does not request production of the databases identified, but rather records sufficient to identify such databases.

5. All records reflecting guidance—including directives, instructions, directions, memoranda, informal email guidance, and/or any other informal written or oral guidance—prepared by, provided to, or otherwise in the possession of your agency governing the access of individuals performing the work of the Department of Government Efficiency (DOGE), U.S. DOGE Service (USDS, formerly U.S. Digital Service), and/or U.S. DOGE Service Temporary

⁴ For further identifying information, *see*, Exec. Order No. 14158, 90 Fed. Reg. 8441, available at <https://www.whitehouse.gov/presidential-actions/2025/01/establishing-and-implementing-the-presidents-department-of-government-efficiency/>.

⁵ For purposes of this request, please understand “sensitive information” to include the definition adopted by the Technology Transformation Service, available at <https://handbook.tts.gsa.gov/general-information-and-resources/sensitive-information/>.

Organization, including employees, personnel, volunteers, and individuals associated with DOGE Agency Teams,⁶ to personally identifiable or sensitive information or data.

6. Records sufficient to identify all computer programs, applications, and processes, including, but not limited to, artificial intelligence (AI) and large language models (LLMs), your agency is using to store, process or analyze personally identifiable or sensitive information or data.
7. Records sufficient to identify all applications (including deleted apps) downloaded and installed on computers of individuals performing the work of the Department of Government Efficiency (DOGE), U.S. DOGE Service (USDS, formerly U.S. Digital Service), and/or U.S. DOGE Service Temporary Organization, including employees, personnel, volunteers, and individuals associated with DOGE Agency Teams,⁷ to conduct agency business or activities connected to DOGE, USDS, and/or U.S. DOGE Service Temporary Organization.
8. All records reflecting guidance—including directives, instructions, directions, memoranda, informal email guidance, and/or any other informal written guidance—prepared by, provided to, or otherwise in the possession of your agency regarding the use or application of artificial intelligence (AI) and/or large language models (LLMs) on or to information or data made or received by your agency.

For all parts of this request, please provide all responsive records from January 20, 2025, through the date the search is conducted.

Request 2 - FIRING EMPLOYEES

1. All final analyses prepared by, provided to, or otherwise in the possession of your agency regarding the following topics:
 - a. The dismantling, elimination, and/or reduction of the personnel and/or operations of the U.S. Agency for International Development (USAID), including, but not limited to, the subsummation of USAID into the Department of State (STATE) and/or the transfer of USAID duties and/or operations—including any components of USAID—to any other federal agency.
 - b. The dismantling, elimination, and/or reduction of the personnel and/or operations of the Consumer Financial Protection Bureau (CFPB), including, but not limited to, the transfer of CFPB duties and/or

⁶ For further identifying information, *see supra* note 4.

⁷ For further identifying information, *see id.*

operations—including any components of CFPB—to any other federal agency.

- c. The dismantling, elimination, and/or reduction of the personnel and/or operations of the Department of Education (ED), including, but not limited to, the transfer of ED duties and/or operations—including specific components of ED—to any other federal agency.
- d. The dismantling, elimination, and/or reduction of the personnel and/or operations of any other federal agency, including, but not limited to, the Social Security Administration, U.S. African Development Foundation, the Inter-American Foundation, the U.S. Postal Service, the U.S. Institute of Peace, and/or the Presidio Trust.
- e. The January 28, 2025, email titled “Fork in the Road” sent from the email address hr@opm.gov.⁸
- f. The cancelling of federal contracts.
- g. The cancelling of federal leases.
- h. The firing of any probationary employee at any federal agency.
- i. Reduction(s) in Force (RIF) at any federal agency.
- j. The firing and/or removal of independent oversight officials, including, but not limited to, officials at the Office of Special Counsel (OSC) and/or Inspector(s) General at any federal agency.
- k. The authority and/or ability to block any federal payments.
- l. The authority of individuals performing the work of the Department of Government Efficiency (DOGE), U.S. DOGE Service (USDS, formerly U.S. Digital Service), and/or U.S. DOGE Service Temporary Organization, including employees, personnel, volunteers, and individuals associated with DOGE Agency Teams,⁹ to direct, lead, execute, issue, and/or complete any task, guidance, and/or directive regarding any of the topics listed above in parts 1a through 1k of this request.

⁸ For further identifying information, *see* Emily Davies et al., *Musk Team’s Push to Gut Federal Workforce Bypassed Key Trump Officials*, WASH. POST (Jan. 29, 2025), <https://www.washingtonpost.com/business/2025/01/29/elon-musk-opm-federal-workers-buyout-trump/>.

⁹ For further identifying information, *see*, Exec. Order No. 14158, 90 Fed. Reg. 8441, available at <https://www.whitehouse.gov/presidential-actions/2025/01/establishing-and-implementing-the-presidents-department-of-government-efficiency/>.

- m. The funding of the operations of DOGE, U.S. DOGE Service (USDS, formerly U.S. Digital Service), and/or U.S. DOGE Service Temporary Organization, including, but not limited to, through the Economy Act.¹⁰
2. All final assessments (including, but not limited to, impact assessments) and/or reports prepared by, provided to, or otherwise in the possession of your agency regarding any of the topics listed above in parts 1a through 1m of this request.
3. All records reflecting guidance—including directives, instructions, directions, memoranda, informal email guidance, and/or any other informal written or oral guidance—prepared by, provided to, or otherwise in the possession of your agency regarding any of the topics listed above in parts 1a through 1m of this request.

For all parts of this request, please provide all responsive records from January 20, 2025, through the date the search is conducted.

Request 3 - LEADERSHIP/AUTHORITY/CONFLICTS OF INTEREST

1. Records sufficient to identify the name, job title, grade level, position description, category of employment,¹¹ and salary of every individual who entered a position at DOGE, the U.S. DOGE Service (USDS, formerly U.S. Digital Service), and/or the U.S. DOGE Service Temporary Organization since January 20, 2025, including, but not limited to, all individuals listed below and all individuals who have been provided an email address ending in @doge.gov and/or @doge.eop.gov.

Individuals:

- i. Elon Musk
- ii. Amy Gleason
- iii. Justin Aimonetti
- iv. Jacob Altik
- v. Anthony Armstrong
- vi. Jennifer Balajadia
- vii. Alexandra Beynon
- viii. Riccardo Baisini
- ix. Akash Bobba
- x. Ashley Boizelle
- xi. Emily Bryant

¹⁰ For further identifying information, see, Avi Asher-Schapiro et al., *DOGE's Millions: As Musk and Trump Gut Government, Their Ax-Cutting Agency Gets Cash Infusion*, PROPUBLICA (Feb. 20, 2025, 3:55 PM), <https://www.propublica.org/article/doge-trump-musk-funding-foia-congress-transparency>.

¹¹ Example employment categories may include Senior Executive Service, Special Government Employee, permanent career employee, career-conditional employee, etc.

xii.	James Burnham
xiii.	Edward Coristine
xiv.	Steven Davis
xv.	Marko Elez
xvi.	Luke Farritor
xvii.	Joshua Fox
xviii.	Antonio Gracias
xix.	Joshua Hanley
xx.	Stephanie Holmes
xxi.	Erica Jehling
xxii.	Gautier Killian
xxiii.	Gavin Kliger
xxiv.	Keenan Kmiec
xxv.	Nicholas Lahera
xxvi.	Scott Langmack
xxvii.	Jeremy Lewin
xxviii.	Kendall Lindemann
xxix.	Katie Miller
xxx.	Noah Peters
xxxi.	Nikhil Rajpal
xxxii.	Adam Ramada
xxxiii.	Austin Raynor
xxxiv.	Mike Russo
xxxv.	Kyle Schutt
xxxvi.	Ethan Shaotran
xxxvii.	Brad Smith
xxxviii.	Christopher Stanley
xxxix.	Thomas Shedd
xl.	Jordan Wick
xli.	Ryan Wunderly
xlii.	Christopher Young

To the extent that such individuals have held multiple titles or positions since January 20, 2025, part one of this request includes records sufficient to identify each title or position, and each corresponding grade level, position description, category of employment, and salary.

2. For each individual identified in response to part one of this request:
 - a. All resumes for that individual contained within the agency's records.
 - b. All conflicts or ethics waivers or authorizations issued for the individual, including, but not limited to, authorizations pursuant to 5 C.F.R. § 2635.502.

- c. Copies of any SF-50 forms for the individual reflecting any change in position or title, including when the employee enters or leaves a position. We have no objection to the redaction of home addresses, telephone numbers, or social security numbers from the SF-50s.
- d. All non-disclosure agreements (NDAs) signed by the individual.

For part two of this request, we do not object to the redaction of past salary information or contact information—including addresses, telephone numbers, and email addresses—for the employee or associated references. However, employment, education, and professional association information is not exempt, and we object to any redactions of such information.

3. Records sufficient to identify the relationships between (e.g., chains of command) and relative rank of each position within DOGE, USDS, and the U.S. DOGE Service Temporary Organization, such as an organizational chart.
4. Records sufficient to identify the names and job titles of all individuals selected by all federal agencies to serve on their DOGE Agency Teams and provided to USDS.¹²

To the extent USDS aggregated and maintains information on DOGE Agency Team membership in a database or spreadsheet,¹³ we would accept as responsive to part four of this request a printout or PDF of the database.

5. All agreements, contracts, and/or memoranda of understanding (MOUs) between (a) DOGE, the U.S. DOGE Service (USDS, formerly U.S. Digital Service), and/or the U.S. DOGE Service Temporary Organization, including any individuals associated with any of these entities, and (b) any other federal agency or official(s), including the U.S. Postal Service and any DOGE Agency Teams.

We request as responsive to part five of this request a complete, final copy of each responsive agreement, contract, and/or MOU.

For all parts of this request, please provide all responsive records from January 20, 2025, through the date the search is conducted.

Request 4 – COMMUNICATIONS

¹² For further identifying information, *see*, Exec. Order No. 14158, 90 Fed. Reg. 8441, available at <https://www.whitehouse.gov/presidential-actions/2025/01/establishing-and-implementing-the-presidents-department-of-government-efficiency/>.

¹³ We request responsive data in a Microsoft Excel spreadsheet format, to the extent your agency maintains such data in a database or other format that can be readily exported into such format.

1. All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) sent by any of the individuals listed below and containing any of the following key terms, also listed below.

Individuals:

- i. Elon Musk
- ii. Amy Gleason
- iii. Justin Aimonetti
- iv. Jacob Altik
- v. Anthony Armstrong
- vi. Jennifer Balajadia
- vii. Alexandra Beynon
- viii. Riccardo Baisini
- ix. Akash Bobba
- x. Ashley Boizelle
- xi. Emily Bryant
- xii. James Burnham
- xiii. Edward Coristine
- xiv. Steven Davis
- xv. Marko Elez
- xvi. Luke Farritor
- xvii. Joshua Fox
- xviii. Antonio Gracias
- xix. Joshua Hanley
- xx. Stephanie Holmes
- xxi. Erica Jehling
- xxii. Gautier Killian
- xxiii. Gavin Kliger
- xxiv. Keenan Kmiec
- xxv. Nicholas Lahera
- xxvi. Scott Langmack
- xxvii. Jeremy Lewin
- xxviii. Kendall Lindemann
- xxix. Katie Miller
- xxx. Noah Peters
- xxxi. Nikhil Rajpal
- xxxii. Adam Ramada
- xxxiii. Austin Raynor
- xxxiv. Mike Russo
- xxxv. Kyle Schutt
- xxxvi. Ethan Shaotran
- xxxvii. Brad Smith
- xxxviii. Christopher Stanley
- xxxix. Thomas Shedd
- xl. Jordan Wick

- xli. Ryan Wunderly
- xlii. Christopher Young

Key Terms:

- a. SpaceX
- b. Starlink
- c. Twitter
- d. xAI
- e. “Boring Company”
- f. Neuralink
- g. Tesla
- h. “Musk Foundation”
- i. “DOGE Central”
- j. “Central DOGE”
- k. Airbnb
- l. conflict
- m. ethics
- n. 2635

In an effort to accommodate your agency and reduce the number of potentially responsive records to be processed and produced, we have limited part one of this request to emails sent by any of the listed individuals. To be clear, however, we still request that complete email chains be produced, displaying both sent and received messages. This means that both an individual’s response to an email and the initial received message are responsive to this request and should be produced.

- 2. All text messages (including complete text message threads or conversations) or messages on messaging platforms (such as Signal, Slack, GChat or Google Hangouts, Lync, Skype, X (formerly Twitter) direct messages, Facebook messages, WhatsApp, Telegram, or Parler) sent by any of the individuals listed above in part one of this request and containing any of the key terms listed above in part one of this request.

In an effort to accommodate your office and reduce the number of potentially responsive records to be processed and produced, we have limited part two of this request to text messages and messages on messaging platforms sent by any of the listed individuals. For text messages or messages on other messaging platforms, we request that full text message threads/conversations be produced. For example, if an individual sent a text message containing any of the key terms listed above, the complete thread/conversation for 24 hours before and after the key term appears should be produced, and not just the message containing the key term.

- 3. All email communications (including email messages, complete email chains, calendar invitations, or any attachments thereto) between (a) any of the

individuals listed above in part one of this request and (b) any of the external entities listed below, including, but not limited to, anyone communicating from the listed email address(es) or an email address ending in a listed domain.

External Entities:

- a. SpaceX (@SpaceX.com)
- b. Starlink (@Starlink.com)
- c. X, formerly Twitter (@Twitter.com, @X.com, @e.X.com)
- d. xAI (@xAI.com)
- e. The Boring Company (@BoringCompany.com)
- f. Neuralink (@Neuralink.com)
- g. Tesla (@Tesla.com)

For part three of this request, the search should include any subdomains at each domain listed above (e.g., for X.com, please also include searches that would capture “e.X.com”, etc.).

Please note that we do not seek, and that part three of this request specifically excludes, the initial mailing of news clips or other mass-distribution emails. However, subsequent communications forwarding such emails are responsive to this request. In other words, for example, if a listed individual received a mass-distribution news clip email from SpaceX (SpaceX.com), that initial email would not be responsive to this request. However, if that individual forwarded that email to another individual with their own commentary, that subsequent message would be responsive to this request and should be produced.

For all parts of this request, please provide all responsive records from January 20, 2025, through the date the search is conducted.

Application for Expedited Processing

Pursuant to 5 U.S.C. § 552(a)(6)(E)(1) and 5 C.F.R. Part 1303, we request that your agency expedite the processing of this request.

We certify to be true and correct to the best of our knowledge and belief that there is widespread and exceptional public and media interest and there exist possible questions concerning the government’s integrity, which affect public confidence. In an Inauguration Day executive order, President Trump integrated the Department of Government Efficiency (DOGE) into the U.S. DOGE Service (USDS, formerly U.S. Digital Service) and established the U.S. DOGE Service Temporary Organization.¹⁴ Since the signing of

¹⁴ See Kim *supra* note 1.

this executive order, media interest on DOGE's leadership,¹⁵ composition,¹⁶ actions,¹⁷ authority,¹⁸ legality,¹⁹ and potential conflicts of interest²⁰ has been widespread and exceptional. Specific actions by DOGE that have garnered particularly widespread and exceptional media interest include the mass terminations of federal employees,²¹ the

¹⁵ See, e.g., Faiz Siddiqui, *White House Names Amy Gleason U.S. DOGE Service Administrator*, WASH. POST, Feb. 25, 2025, <https://www.washingtonpost.com/business/2025/02/25/doge-administrator/>.

¹⁶ See, e.g., *The People Carrying Out Musk's Plans at DOGE*, N.Y. TIMES (updated March 6, 2025), <https://www.nytimes.com/interactive/2025/02/27/us/politics/doge-staff-list.html#>; Avi Asher-Schapiro et al., *Elon Musk's Demolition Crew*, PROPUBLICA (updated Feb. 20, 2025), <https://projects.propublica.org/elon-musk-doge-tracker/>; Yeganeh Torbati et al., *Who's Working for Elon Musk's DOGE?*, WASH. POST (updated March 5, 2025), <https://www.washingtonpost.com/business/2025/02/14/doge-employees-list-staff-elon-musk/>.

¹⁷ See, e.g., Nik Popli, *What DOGE Is Doing Across the Federal Government*, TIME (updated Feb. 21, 2025, 1:31 PM), <https://time.com/7222251/doge-musk-federal-workers-government/>; Ivan Pereira & Emily Chang, *Here Are All the Agencies that Elon Musk and DOGE Have Been Trying to Dismantle So Far*, ABC (Feb. 27, 2025, 7:02 PM), <https://abcnews.go.com/Politics/elon-musks-government-dismantling-fight-stop/story?id=118576033>.

¹⁸ See, e.g., Nnamdi Egwuonwu, *Trump Puts New Limits on Elon Musk's Authority Amid Backlash to DOGE Cuts*, NBC (March 6, 2025, 11:13 PM), <https://www.nbcnews.com/politics/doge/trump-cabinet-meeting-new-limits-elon-musk-backlash-doge-cuts-rcna195259>; Zach Schonfeld & Julia Shapero, *DOGE Structure, Authority Emerge as Biggest DC Mystery Under Trump*, THE HILL (March 1, 2025, 5:00 PM), <https://thehill.com/policy/technology/5170326-doge-structure-trump-mystery/>.

¹⁹ See, e.g., Amber Phillips, *Is What DOGE Doing Legal?*, WASH. POST, Feb. 27, 2025, <https://www.washingtonpost.com/politics/2025/02/27/is-what-doge-doing-even-legal/>; Alfred Ng, *The Law Everyone Is Suddenly Turning to Because of DOGE*, POLITICO (March 6, 2025, 10:00 AM), <https://www.politico.com/news/2025/03/06/doge-musk-court-privacy-sensitive-data-00211749>; Ben Makuch, *Elon Musk's Gutting of US Agencies Is Illegal, Experts Say. How Do You Muzzle DOGE*, THE GUARDIAN (Feb. 10, 2025, 6:00 AM), <https://www.theguardian.com/us-news/2025/feb/10/elon-musk-doge-agency-illegal>.

²⁰ See, e.g., Katie Drummond & Brian Barrett, *Behind DOGE's Many Conflicts of Interest and Elon Musk's Weekend Email Chaos*, WIRED (Feb. 27, 2025, 5:12 PM), <https://www.wired.com/story/uncanny-valley-news-update-doge-conflicts-elon-musk-email-chaos/>; Tim Dickinson, *How Elon Musk Is Using DOGE to Weaken His Regulators*, ROLLING STONE (March 1, 2025), <https://www.rollingstone.com/politics/politics-features/trump-elon-musk-doge-weaken-regulators-1235284085/>.

²¹ See, e.g., Gary Grumbach et al., *Judge Orders DOGE Employee to Testify in Lawsuit Against the Trump Administration*, NBC (Feb. 27, 2025, 9:08 PM), <https://www.nbcnews.com/politics/doge/judge-orders-doge-employee-testify-lawsuit-trump-administration-rcna194145>; Matt Bracken, *IRS, DOGE Sued By Union Groups Over Access to Tax Agency Systems*, FEDSCOOP (Feb. 19, 2025), <https://fedscoop.com/doge-access-irs-systems-elon-musk-lawsuit/>; Ali Bianco, *Judge Temporarily Halts Trump Administration from Ousting Head of United States African Development Foundation*, POLITICO (updated March 7, 12:53 PM), <https://www.politico.com/news/2025/03/06/african-development-foundation-doge-00216463>; Lisa Mascaro, *Democrats Seek to Probe Musk Conflicts and DOGE Firings with Resolutions of Inquiry in the House*, AP (updated March 4, 2025, 2:21 PM), <https://apnews.com/article/house-democrats-musk-doge-oversight-57ef4e4509206da026eae4e702ef5b18>; Tim Starks, *House Dems Say DOGE Is Leaving Publicly Exposed Entry Points Into Government Systems*, CYBERSCOOP (Feb. 25, 2025), <https://cyberscoop.com/house-dems-say-doge-is-leaving-publicly-exposed-entry-points-into-government-systems/>.

dismantling of multiple federal agencies,²² and the accessing of sensitive information across various agencies.²³

Moreover, we certify to be true and correct to the best of our knowledge and belief that there exist possible questions concerning the government's integrity regarding DOGE's operations, formation, and activity, which form the basis of this request, as many of DOGE's actions may be outside the bounds of federal law.²⁴ For instance, there are open and outstanding questions regarding the steps that members of the Trump Administration—including allies of Elon Musk and DOGE—have taken to dismantle federal agencies, including USAID.²⁵ Elected officials have questioned the legality of the

²² See, e.g., Matthew Goldstein & Jessica Silver-Greenberg, *'Deregulation by Firings': Breaking Down the Cuts to Financial Oversight*, N.Y. TIMES (updated Feb. 13, 2025, 6:42 AM), <https://www.nytimes.com/2025/02/13/business/trump-deregulation-firing.html>; Tony Romm, *DOGE Targets Consumer Financial Protection Bureau as Musk Tweets 'RIP'*, WASH. POST (updated Feb. 7, 2025), <https://www.washingtonpost.com/business/2025/02/07/cfpb-doge-trump-musk-chopra/>; Carmen Paun et al., *Musk on USAID: 'Time for It to Die.'* POLITICO (updated Feb. 2, 2025, 9:54 PM), <https://www.politico.com/news/2025/02/02/musk-usaid-time-00201987>; Jennifer Hansler et al., *Elon Musk Said Donald Trump Agreed USAID Needs to Be 'Shut Down.'* CNN (updated Feb. 3, 2025, 7:48 AM), <https://www.cnn.com/2025/02/02/politics/usaid-officials-leave-musk-doge/index.html>; Will Steakin et al., *Turmoil Inside USAID: Staff to Work from Home as Musk Seeks to Shut Down Agency*, ABC NEWS (Feb. 3, 2025, 4:59 PM), <https://abcnews.go.com/Politics/turmoil-inside-usaid-doge-reps-offices-senior-officials/story?id=118368900>; Rebecca Heilweil, *USAID Website Goes Dark, Staff Emails Deactivated Amid DOGE Takeover, Source Says*, FEDSCOOP (Feb. 2, 2025), <https://fedscoop.com/usaid-website-goes-dark-staff-emails-deactivated-amid-doge-takeover-source-says/>.

²³ See, e.g., Hannah Natanson et al., *Elon Musk's DOGE Is Feeding Sensitive Federal Data into AI to Target Cuts*, WASH. POST (updated Feb. 6, 2025), <https://www.washingtonpost.com/nation/2025/02/06/elon-musk-doge-ai-department-education/>; Alan Rappeport et al., *Top Social Security Official Leaves After Musk Team Seeks Data Access*, N.Y. TIMES, Feb. 17, 2025, <https://www.nytimes.com/2025/02/17/us/politics/social-security-musk-team-access.html>; Zac Anderson, *Elon Musk's DOGE Seeks Access to Sensitive and Restricted IRS Data*, USA TODAY (updated Feb. 18, 2025, 3:59 PM), <https://www.usatoday.com/story/news/politics/2025/02/17/doge-seeks-irs-computer-system-access/78960447007/>; Timothy Gardner, *Democratic US Lawmakers Ask Energy Department About Any DOGE Access to Nuclear Data*, REUTERS (Feb. 12, 2025, 12:49 PM), <https://www.reuters.com/world/us/democratic-us-lawmakers-ask-energy-department-about-any-doge-access-nuclear-data-2025-02-12/>; Andrew Duehren et al., *Elon Musk's Team Now Has Access to Treasury's Payments System*, N.Y. TIMES (Feb. 1, 2025), <https://www.nytimes.com/2025/02/01/us/politics/elon-musk-doge-federal-payments-system.html>.

²⁴ See, e.g., Peter Charalambous & Katherine Faulders, *Lawyers Use Trump's Speech Before Congress in Suit Against DOGE*, ABC (March 5, 2025, 1:08 PM), <https://abcnews.go.com/Politics/lawyers-trumps-speech-congress-suit-doge/story?id=119477540>; Chris Arnold, *Courts Block Trump's DOGE Actions – Chaos, Panic Not Proving to Be Best Legal Strategy*, NPR (Feb. 15, 2025, 7:00 AM), <https://www.npr.org/2025/02/15/nx-s1-5297925/courts-block-trumps-doge-actions-chaos-panic-not-proving-to-be-best-legal-strategy>; Zoe Tillman & Erik Larson, *Judge Prods 'Where Is Mr. Musk' As DOGE Legal Challenges Build*, BLOOMBERG (Feb. 25, 2025, 10:55 AM), <https://www.bloomberg.com/news/articles/2025-02-25/judge-prods-where-is-mr-musk-as-doge-legal-challenges-build>; *Court Challenge of DOGE Focuses on Elon Musk's 'Unusual Powers'*, NBC, Feb. 18, 2025, <https://www.nbcnews.com/meet-the-press/video/court-challenge-of-doge-focuses-on-elon-musk-s-unusual-powers-232305733949>; Louis Jacobson, *Do Elon Musk and DOGE Have Power to Close US Government Agencies?*, AL JAZEERA (Feb. 8, 2025), <https://www.aljazeera.com/features/2025/2/8/do-elon-musk-and-doge-have-power-to-close-us-government-agencies>.

²⁵ See, e.g., Edward Wong et al., *Top Security Officials at Aid Agency Put on Leave After Denying Access to Musk Team*, N.Y. TIMES (Feb. 2, 2025), <https://www.nytimes.com/2025/02/02/us/politics/usaid-official-leave-musk.html>; Michael Crowley et al., *Rubio Says He Now Runs Aid Agency, as Staff Are Blocked From*

Trump administration's actions, stating that it is "plain illegal" and "a constitutional crisis."²⁶ Further, there are open and outstanding questions regarding the steps that the Trump Administration has taken to ensure that DOGE's access to sensitive information complies with all relevant federal law.²⁷ Multiple such concerns have prompted lawsuits against actions led by DOGE and inquiries by Members of Congress.²⁸ The information requested is necessary to provide answers to the many open questions and an explanation to the public as to whether the Trump administration has followed the law in the establishment and operations of DOGE.

Accordingly, our request satisfies the criteria for expedition.

Guidance Regarding the Search & Processing of Requested Records

In connection with our request for records, we provide the following guidance regarding the scope of the records sought and the search and processing of records:

- Please take immediate and appropriate steps to ensure that records responsive to this request are not deleted by the agency before the completion of processing for this request. If records potentially responsive to this request are likely to be located on systems where they are subject to potential deletion, including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records.

Systems, N.Y. TIMES (Feb. 3, 2025, 12:54 PM), <https://www.nytimes.com/2025/02/03/us/politics/usaaid-trump-musk.html?smid=url-share>; Ellen Knickmeyer & Fatima Hussein, *USAID Headquarters in Washington are Blocked After Musk Says Trump Agrees to Close the Aid Agency*, AP (updated Feb. 3, 2025, 12:50 PM EST), <https://apnews.com/article/trump-musk-usaid-c0c7799be0b2fa7cad4c806565985fe2>.

²⁶ Jennifer Hansler et al., *Rubio Says He's Acting Director of USAID as Humanitarian Agency is Taken Over by the State Department*, CNN (updated Feb. 3, 2025, 2:20 PM EST), <https://www.cnn.com/2025/02/03/politics/usaaid-washington-workers/index.html>.

²⁷ See, e.g., Beatrice Nolan, *A 25-Year-Old Staffer with Elon Musk's DOGE Was Accidentally Given Permission to Edit a Sensitive Treasury Payments System*, FORTUNE (Feb. 13, 2025, 1:30 PM), <https://fortune.com/2025/02/13/a-25-year-old-staffer-with-elon-musks-doge-was-accidentally-given-permission-to-edit-a-sensitive-treasury-payments-system/>; Alan Rappeport et al., *Top Social Security Official Leaves After Musk Team Seeks Data Access*, N.Y. TIMES (Feb. 17, 2025), <https://www.nytimes.com/2025/02/17/us/politics/social-security-musk-team-access.html>; Emily Davies & Faiz Siddiqui, *GSA Engineering Lead Resigns Over DOGE Ally's Request for Access*, WASH. POST (updated Feb. 18, 2025, 6:08 PM), <https://www.washingtonpost.com/business/2025/02/18/gsa-staffer-resigns-doge/>.

²⁸ See, e.g., *New Mexico v. Musk*, No. 25-cv-429 (D.D.C. Feb. 13, 2025); *Lentini v. Dep't of Gov't Efficiency*, No. 25-cv-166 (D.D.C., Jan. 20, 2025); *Ctr. for Bio. Diversity v. OMB*, No. 25-cv-165 (D.D.C. Jan. 20, 2025); *J. Doe 1-26 v. Musk*, No. 8:25-cv-462 (D. Md., Feb. 13, 2025); *Brehm v. Marocco*, No. 25-cv-660 (D.D.C., Mar. 6, 2025); *CREW v. Dep't of Gov't Efficiency*, No. 25-cv-511 (D.D.C., Feb. 20, 2025); *Am. Oversight v. Dep't of Gov't Efficiency*, No. 25-cv-409 (D.D.C. Feb. 11, 2025); Letters from Ranking Member Gerald E. Connolly to 24 heads of CFO agencies (Mar. 6, 2025), available at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/evo-media-document/2025-03-06-gec-to-24-cfo-act-agencies-re-doge.pdf>; Letter from Sen. Elizabeth Warren, et al., to Elon Musk (Feb. 27, 2025), available at https://www.warren.senate.gov/imo/media/doc/letter_to_elon_musk_re_dogegovsecurityfailures.pdf.

- Please search all locations and systems likely to have responsive records, regardless of format, medium, or physical characteristics.
- In conducting your search, please understand the terms “record,” “document,” and “information” in their broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs, as well as letters, emails, facsimiles, telephone messages, voice mail messages and transcripts, notes, or minutes of any meetings, telephone conversations or discussions.
- Our request for records includes any attachments to those records or other materials enclosed with those records when they were previously transmitted. To the extent that an email is responsive to our request, our request includes all prior messages sent or received in that email chain, as well as any attachments to the email.
- Please search all relevant records or systems containing records regarding agency business. Do not exclude records regarding agency business contained in files, email accounts, or devices in the personal custody of your officials, such as personal email accounts or text messages. Records of official business conducted using unofficial systems or stored outside of official files are subject to the Federal Records Act and FOIA.²⁹ It is not adequate to rely on policies and procedures that require officials to move such information to official systems within a certain period of time; we have a right to records contained in those files even if material has not yet been moved to official systems or if officials have, by intent or through negligence, failed to meet their obligations.³⁰
- Please use all tools available to your agency to conduct a complete and efficient search for potentially responsive records. Agencies are subject to government-wide requirements to manage agency information electronically,³¹ and many agencies have adopted the National Archives and Records Administration (NARA) Capstone program, or similar policies. These systems provide options for searching emails and other electronic records in a manner that is reasonably likely to be more complete than just searching individual custodian files. For example, a custodian may have deleted a responsive email from his or her email program, but your agency’s archiving tools may capture that email under Capstone. At the same time, custodian searches are still necessary; agencies may

²⁹ See *Competitive Enter. Inst. v. Office of Sci. & Tech. Policy*, 827 F.3d 145, 149–50 (D.C. Cir. 2016); cf. *Judicial Watch, Inc. v. Kerry*, 844 F.3d 952, 955–56 (D.C. Cir. 2016).

³⁰ See *Competitive Enter. Inst. v. Office of Sci. & Tech. Policy*, No. 14-cv-765, slip op. at 8 (D.D.C. Dec. 12, 2016).

³¹ Presidential Memorandum—Managing Government Records, 76 Fed. Reg. 75,423 (Nov. 28, 2011), <https://obamawhitehouse.archives.gov/the-press-office/2011/11/28/presidential-memorandum-managing-government-records>; Office of Mgmt. & Budget, Exec. Office of the President, Memorandum for the Heads of Executive Departments & Independent Agencies, “Managing Government Records Directive,” M-12-18 (Aug. 24, 2012), <https://www.archives.gov/files/records-mgmt/m-12-18.pdf>.

not have direct access to files stored in .PST files, outside of network drives, in paper format, or in personal email accounts.

- In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records. If a request is denied in whole, please state specifically why it is not reasonable to segregate portions of the record for release.

Conclusion

If you have any questions regarding how to construe this request for records or believe that further discussions regarding search and processing would facilitate a more efficient production of records of interest to us, please do not hesitate to contact the Democratic staff of the House Judiciary and Oversight Committees. We welcome an opportunity to discuss our request with you before you undertake your search or incur search or duplication costs. By working together at the outset, we can decrease the likelihood of costly and time-consuming litigation in the future.

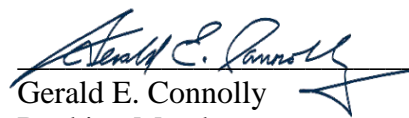
Where possible, please provide responsive material in an electronic format by email. Alternatively, please provide responsive material in native format or in PDF format on a USB drive. Please send any responsive material being sent by mail to JudiciaryDEMClerts@mail.house.gov.

We share a common mission to promote transparency in government. We look forward to working with your agency on this request. If you do not understand any part of this request, please contact our staff at JudiciaryDEMClerts@mail.house.gov and 202-225-3951. Also, if our request for expedition is not granted, please contact us immediately upon making such a determination.

Sincerely,



Jamie Raskin
Ranking Member
House Committee on the Judiciary



Gerald E. Connolly
Ranking Member
House Committee on Oversight
and Government Reform