



NATIONAL SECURITY
— LAW FIRM —
IT'S OUR TURN TO FIGHT FOR YOU

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December 20, 2025

Federal Bureau of Investigation
Attn: FOI/PA Record Request
Records/Information Dissemination Section
200 Constitution Drive
Winchester, VA 22602-4843

Dear FOIA Officer:

Pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, I hereby request, on behalf of the National Police Association, copies of Federal Bureau of Investigation (“FBI”) records related to the investigation of Jeffrey E. Epstein (“Epstein Investigation,” FBI case file 50D-NY-3027571 and any associated case files in New York, Florida, or elsewhere). As detailed below, we are requesting records that would shed light on the scope and conduct of the FBI’s investigation, with a particular focus on decisions made during the course of the investigation.

For the avoidance of doubt, this request is directed at understanding the institutional handling of the Epstein investigation and the decisions explaining why the Department of Justice (“DOJ”) did not charge any individuals in connection with the investigation beyond Epstein himself.

I. Records Request

We request the following categories of records (created or obtained between January 1, 2005 to the present, unless a different timeframe is specified for a category) for all communications and recordings, including but not limited to emails (with attachments), text messages, voicemail recordings, audio files, letters or written correspondence, and messages exchanged through digital platforms such as Signal, WhatsApp, Microsoft Teams, Slack, or any other recorded form of communication regarding Jeffrey Epstein, Ghislaine Maxwell, and individuals named or referenced or suspected in connection with Epstein’s criminal activities, civil settlements, immunity, plea agreements, or investigatory proceedings:

1. **Interview and Witness Records – Not Conducted or Delayed:** All records discussing decisions, considerations, or plans to interview (or not interview) specific individuals in connection with the Epstein investigation. This includes, but is not limited to:
 - Identified Victims or Witnesses whom the FBI was aware of but *did not formally interview* or only interviewed after a significant delay.
 - Associates of Epstein who were considered for an interview but never interviewed. (For example, any discussion regarding high-profile associates such as Donald J. Trump, William J. Clinton, Prince Andrew [Duke of York], or others whose names came up in the investigation, addressing whether to interview them and any reasons for not doing so.)
 - Any lists or spreadsheets of planned interviews vs. completed interviews, or internal correspondence (emails, memos) where agents or supervisors debate or *recommend against* contacting certain individuals.
 - Records of communications with other agencies or offices about interviewing key individuals (e.g., emails between FBI and Main Justice about approaching Prince Andrew through the Mutual Legal Assistance Treaty (MLAT) or contacting a former President).

2. **Unfollowed Leads and Tips:** All records reflecting tips, leads, or complaints related to Epstein that were received by the FBI but not pursued. This includes:
 - Early reports (circa 1996–2004) of Epstein’s criminal activity that did not lead to an active FBI case (e.g., any record of a 1996 report by a victim/witness about Epstein/Maxwell). If a report was received and *no action* was taken, please provide any documentation of that report and any notation of the decision/reason to take no further action at that time.
 - Other victim or witness complaints (from any time period) that the FBI logged or was informed of (e.g., via local police, other agencies, or the public) but did not act upon or deferred.
 - Lead sheets or case notes indicating information known to investigators but *not followed up*; and
 - Communications about not following a particular lead (e.g., proposals for investigative steps that were declined or postponed).
 - Communications, about the destruction, deletion, alteration, misplacement, or concealment of documents, recordings, or electronic data related to Epstein and his associates.

3. **Evidence Collected vs. Evidence Analyzed:** All records concerning evidence obtained by the FBI but never fully examined, analyzed, or exploited. Specifically:
 - Evidence logs, inventory lists, or chain-of-custody records showing items (e.g., electronic devices or storage media) entered into evidence but *not processed* or analyzed;
 - Internal memos/emails on processing limitations (backlogs, encryption, resource constraints), and
 - Records of lost/missing/temporarily misplaced evidence and any related incident reports or chain-of-custody entries.
 - If the FBI asserts all evidence was fully analyzed, please provide final case summaries/closing memos reflecting that.

4. **Co-Conspirators and Referral/Declination Communications:** All records identifying individuals other than Epstein who were suspected, identified, or investigated as participants, and records showing decisions whether to charge or not charge those individuals, including:
 - Lists/notes naming potential co-conspirators or additional subjects (with redactions as needed);
 - Communications with prosecutors (United States Attorney's Offices, Main Justice) about potential charges, immunity, referrals, or declinations;
 - Records related to the 2007–2008 Non-Prosecution Agreement (NPA) referencing co-conspirators; and
 - Referrals to other jurisdictions (state/foreign) and related correspondence.
 - Records related to alleged criminal activities, civil settlements, immunity or plea agreements.

5. **Internal Communications About Investigative Scope or Limitations:** Records of internal FBI discussions, directives, or concerns about limiting the scope of the investigation, including:
 - HQ–Field guidance or restrictions;
 - Resource allocation discussions (staffing, technical capacity);
 - Records indicating external pressure or sensitive handling; and
 - Decisions to close or pause parts of the investigation (e.g., closing memos, meeting notes).

6. **Investigative Reviews or Misconduct Inquiries:** Any records related to internal reviews of the FBI's handling of the Epstein case, including:
 - Office of the Inspector General/Office of Professional Responsibility investigations related to agency personnel assigned to the Epstein investigation;
 - After-action/lessons-learned analyses;
 - Correspondence with Congress/Department of Justice about alleged mishandling; and
 - Victim complaints to the FBI and any internal routing/responses.

7. **Records on Disclosure and Release of Epstein Files:** All records about FBI decisions about sharing or releasing case information, including:
 - Communications with DOJ regarding FOIA or "Epstein file" releases;
 - Internal media/public inquiries handling;
 - Court sealing/protective orders and related unsealing discussions; and
 - FOIA tracking logs/indices and Congressional correspondence about records access.

8. **Facial Recognition Examination Records:** Existing reports, logs, memoranda, or forensic analysis documents pertaining to any facial recognition examinations conducted in connection with the Epstein investigation, including:
 - Descriptions of the system(s) or software used (e.g., the FBI's Next Generation Identification (NGI) face recognition services, any FBI Operational Technology Division (OTD) tools, the FACE Services Unit, or third-party technologies), including version, vendor, and operating parameters where available (user guides/SOPs preferred; not seeking source code or proprietary algorithms).
 - Inventories or logs of materials examined, i.e., identification of videos, audio/video-derived stills, photographs, or other imagery from seized devices or properties that were

- submitted for face recognition queries (you may substitute an index or a count-by-source if more practical).
- Results summaries or reports, including any candidate lists/identifications of suspects, victims, witnesses, or associates, and any confidence scores, match probabilities, thresholds used, error rates noted, or quality/reject codes documented.
 - Referral memoranda or notes based on facial recognition results (e.g., subjects identified and referred for investigative action or prosecution; or denials/closures of such referrals, with reasoning).
 - Internal communications (emails, chats, electronic communications) or policy discussions regarding use, implementation, accuracy, limitations, auditing, or decisions about using facial recognition in this investigation (including any Privacy Impact Assessment (PIA) System of Records Notice (SORN) references, audits, or quality-control reviews).
 - With regards to this portion of the request, please include potentially responsive records maintained by units that commonly handle face recognition workflows or digital forensics, such as the *Operational Technology Division (OTD)*, *Criminal Justice Information Services (CJIS) and Next Generation Identification (NGI) (including FACE Services Unit)*, *Computer Analysis Response Team (CART) labs*, relevant *Field Office Drug Free Workplace Units*, and any external lab/vendor interfaces (limited to *reports/logs/correspondence*, not trade-secret source code). I *am not* seeking the underlying contraband imagery itself; inventories, thumbnails, or redacted exemplars are acceptable where necessary to identify the material referenced.

For all categories (1–8) above, please exclude from the release any depictions of child sexual abuse. However, we request an accounting of the number of depictions of child sexual abuse withheld.

II. Search

The FOIA requires that an agency conduct a search that is “reasonably calculated to uncover all relevant documents.” *Weisberg v. Dep’t of Justice*, 705 F.2d 1344, 1351 (D.C. Cir. 1983). To that end, please search both FBI Headquarters and any appropriate FBI field offices, including the New York and Miami Field Offices (including Palm Beach RA), and any other offices involved (e.g., Albuquerque for Zorro Ranch leads). Within FBI Headquarters, as appropriate, please search, at a minimum: The Office of Public Affairs; The Office of Congressional Affairs; The Office of General Counsel; The Office of Professional Responsibility; The Criminal, Cyber, Response and Services Branch; the Science and Technology Branch. If appropriate, please expand your search to any other offices, branches, divisions, of directorates that are likely to maintain records responsive to the above categories.

Upon releasing the records, we request that you describe the method of your search in sufficient detail to allow an evaluation of its compliance with the terms of the FOIA.

III. Release of Records

The National Police Association respectfully requests that the agency provide records in electronic format (PDF/text) via email or secure download. Given the potential breadth of responsive records, we request that the agency provide a rolling release of records, providing interim releases of records on a monthly or as available basis.

The National Police Association additionally requests that the agency reasonably segregate any releasable information and honor the purpose and requirements of the FOIA. The FOIA espouses “a general philosophy of full agency disclosure,” and we reiterate that “disclosure, not secrecy, is the dominant

objective of [FOIA].” *Dep’t of the Air Force v. Rose*, 425 U.S. 352, 360-61 (1976). That said, we recognize that some governmental information is exempted from release under the FOIA under clearly delineated statutory language. 5 U.S.C. § 552(b) et seq.

To balance those interests, the direct language of the Freedom of Information Act instructs federal agencies to provide any “reasonably segregable portion of a record” to “any person requesting such record after deletion of the portions which are exempt.” 5 U.S.C. §552(b). We therefore ask that your agency undertake a line-by-line review of the records and “differentiate among the contents of a document rather than to treat it as an indivisible ‘record’ for FOIA purposes.” *Fed. Bureau of Investigation v. Abramson*, 456 U.S. 615, 626 (1982).

In anticipation of the potential application of the exemptions, we observe that Mr. Epstein is deceased¹ and therefore he does not maintain any privacy interests in any of his personally identifiable information in the records. We further observe that both the Epstein² and Ghislaine Maxwell³ prosecutions are closed; therefore, Exemption 7(A) should not apply broadly. If specific records would interfere with any currently pending law enforcement matter, please identify the nature of the harm of each piece of information withheld under the exemption rather than invoking a blanket 7(A) denial of an entire record.

Congress has additionally expressed clear intent that records related to this investigation warrant sufficient public interest that records should not be redacted on the basis of embarrassment, reputational harm, or political sensitivity. Pub. Law 119-38, Nov. 19, 2025, 139 Stat. 656. Although this request seeks records other than those described in that Act, we ask that the agency take that guidance into consideration when weighing the public interest in these records against the privacy interest of individuals identified therein.

IV. Fees

The National Police Association respectfully requests a full waiver of all duplication, search, and review fees associated with this request, as disclosure of the requested records is “in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester.” 5 U.S.C. § 552(a)(4)(A); *see also* 28 C.F.R. § 16.10(k)(1). Under Department of Justice regulations, a request meets that standard when disclosure would: (1) Shed light on the operations or activities of the government; (2) Be likely to contribute significantly to public understanding of those operations or activities; and (3) Not be primarily in the commercial interest of the requester. Guiding this analysis, fee waivers should be construed liberally for non-profit organizations such as the National Police Association. *Judicial Watch v. Rossotti*, 326 F.3d 1309, 1312 (D.C. Cir. 2003).

A. Disclosure Would Shed Light on Operations or Activities of the Government

The subject of this request “concern[s] identifiable operations or activities of the Federal Government with a connection that is direct and clear, not remote or attenuated.” 28 C.F.R. § 16.10(k)(2)(i). The requested records concern the FBI’s handling of the Epstein Investigation. These include records related to: the effectiveness and integrity of the federal government’s investigation into a significant criminal enterprise involving public figures; the exercise of the Department of Justice’s prosecutorial and

¹ <https://abcnews.go.com/US/jeffrey-epstein-accused-sex-trafficker-dies-suicide-officials/story?id=64881684>

² <https://apnews.com/article/9032d5b4c8bb4175958da4e545f60543>

³ <https://www.nytimes.com/2021/12/29/nyregion/ghislaine-maxwell-guilty-verdict.html>

investigative discretion; and the decisions related to charging, not charging, or investigating Epstein or his associates. They very clearly concern identifiable operations or activities of the federal government.

B. Disclosure Would Be Likely to Contribute Significantly to Public Understanding

Second, disclosure of the requested information must be likely to contribute significantly to public understanding of those operations or activities. 28 C.F.R. § 16.10(k)(2)(ii). That is, the disclosure of the records “must be meaningfully informative about government operations or activities” in that it is not duplicative of material already in the public domain and it “must contribute to the understanding of a reasonably broad audience of persons interested in the subject as opposed to the individual understanding of the requester.” *Id.*

Regarding the first criterion in this analysis, the requested information is not already in the public domain, nor is it covered by the Epstein Files Transparency Act, which requires the release of some records related to the Epstein Investigation, but not those enumerated above. *See* Pub. Law 119-38, Nov. 19, 2025, 139 Stat. 656.

Regarding the second, the National Police Association has “expertise in the subject area” and the “ability and intention to effectively convey information to the public.” 28 C.F.R. § 16.10(k)(2)(ii)(B). As a well-regarded, media-facing non-profit, the National Police Association possesses the established communication channels, including a website, press releases, and media contacts, necessary to “disseminate the information to a broad segment of the public.” *Id.* Its very mission is to inform the public about policing issues and supporting law enforcement, which it does through writing news articles⁴, filing law suits and making public service announcements⁵, and regularly speaking on its headline issues in the news media⁶. Those pipelines adequately demonstrate the National Police Association’s “ability to publicize disclosed information.” *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003).

The National Police Association has the requisite expertise to analyze and evaluate the records it receives in response to this request, and a proven and extensive track record of disseminating any information it obtains through its own media or that of others. In all of its efforts, the National Police Association analyzes documents it obtains and presents its findings in a clear, accessible manner to its members, the media, and the general public. The organization’s public interest mission ensures the information will be shared to serve the public, not for a private purpose.

C. Disclosure Is Not Primarily in the Commercial Interest of the Requester

The National Police Association is a 501(c)(3) non-profit organization that has no commercial interest in the requested record. Therefore, “disclosure of the information must not be primarily in the commercial interest of the requester.” 28 C.F.R. § 16.11(k)(2)(iii). The National Police Association has a recognized public interest mission. It is not a commercial news organization, data broker, or research firm seeking to sell the information or a related product, and has no commercial interest in the records it obtains. Rather, its lone goal is to educate the public and support the law enforcement officers who participated in the Epstein Investigation. Any incidental media coverage or fundraising benefit that accrues from the dissemination is a secondary benefit of a successful public information effort, and not a “primary commercial interest” that would disqualify a waiver.

⁴ <https://nationalpolice.org/news/>

⁵ <https://nationalpolice.org/docs/>

⁶ <https://nationalpolice.org/npa-in-the-news-wp-links-2/>

D. If the Agency Does Not Grant a Full Fee Waiver, It Should Consider the Requester a Preferred Requester for the Purposes of Fees

In the event that the FBI denies its request for a fee waiver, the National Police Association's publication activities qualify it to be considered as a representative of the news media for the purposes of calculating fees. DOJ regulations define a representative of the news media as any entity that "actively gathers information of potential interest to a segment of the public, uses its editorial skills to turn the raw materials into a distinct work, and distributes that work to an audience." 28 C.F.R. § 16.10(b)(6). Representatives of the National Police Association regularly provide commentary and analysis on national news programs and members regularly gather and analyze information and create independent and original written materials for its website. *See Am. Small Bus. League v. United States Small Bus. Assoc.*, No. 21-cv-02877-DMR, 2022 U.S. Dist. LEXIS 101930, at *39-40 (N.D. Cal. June 7, 2022) (requester's "use of its own website" qualifies it for treatment as a representative of the news media). It therefore fits the criteria outlined in DOJ regulations for representatives of the news media entitled to a waiver of search fees under 28 C.F.R. § 16.10(c)(1)(i) and review fees under 28 C.F.R. § 16.10(c)(3), *see also Cause of Action v. Fed. Trade Comm'n*, 799 F.3d 1108, 1122 (D.C. Cir. 2015) (finding that "[a] substantive press release or editorial comment can be a distinct work based on the underlying material, just as a newspaper article about the same documents would be).

In the event that you deny a fee waiver related to this request, the National Police Association agrees to pay all reasonable fees incurred while processing this request, up to \$1000.00. If the costs of responding to this request should exceed that amount, please contact us first.

V. Expedited Processing

The FOIA requires that an agency process a request on an expedited basis "in cases in which the person requesting the records demonstrates a compelling need and in other cases determined by the agency." 5 U.S.C § 552(a)(6)(E)(i). The Department of Justice additionally allows for expedited processing when a request involves "a matter of widespread and exceptional media interest in which there exist possible questions about the government's integrity that affect public confidence." 28 C.F.R. § 16.5(e)(1)(iv). With regards to the latter, exceptional media interest in an umbrella issue is not sufficient to justify expedited processing. Rather, a requester "must show that there is widespread and exceptional media interest focused on the *specific matter* that raises questions about government integrity, and that this specific matter raises possible ethics issues that affect public confidence." *Democracy Forward Found. v. Dep't of Justice*, No. 25-cv-2597 (TSC), 2025 U.S. Dist. LEXIS 230680, at *12 (D.D.C. Nov. 24, 2025).

The FBI's handling of the Epstein Investigation, and in particular any decisions that led the DOJ not to prosecute any individuals beyond Epstein and Ghislaine Maxwell, have been the subject of intense and exceptional media interest and scrutiny. A court recently observed that "this topic has dominated the national conversation and is ongoing" and would be "hard pressed to think of stronger evidence that this issue has attracted widespread and exceptional media interest." *Id.* 2025 U.S. Dist. LEXIS 230680, at *17. Given the recentness of that decision, the same holds true today. Expedited processing of this request similarly should qualify for expedited processing.

With regards to this request for expedited processing, we certify the above statements to be true and correct pursuant to 28 C.F.R. § 16.5(d)(3).

VI. Conclusion

If you need clarification related to any aspect of this request, please contact me at mpollack@nationalsecuritylawfirm.com. We appreciate your assistance and look forward to your prompt response.

Most Sincerely,

A handwritten signature in black ink, appearing to read 'MP', is positioned above the typed name.

Matthew Pollack
Representative of the National Police Association