

United States Senate

WASHINGTON, DC 20510

November 21, 2025

Kara Christenson
Room 924, HOLC Building
Bureau of Prisons
320 First Street, NW
Washington, DC 20534

Dear FOIA Officer:

Implicit in Article I of the Constitution is Congress's power of inquiry, which is an essential component of Congress's legislative and oversight functions. Concurrent with inquiries we have made to the Department of Justice pursuant to our Article I oversight authority, which have not yet received a response, we are submitting a parallel expedited request under the Freedom of Information Act, 5 U.S.C. § 552, and 28 C.F.R. Part 16, for the following records.

Requested Records

In July or August 2025, the Bureau of Prisons (BOP) transferred Ghislaine Maxwell from Federal Correctional Institution (FCI) Tallahassee to Federal Prison Camp (FPC) Bryan.

Please produce within twenty business days the following records:

1. All records reflecting requests, and the disposition of such requests, for the redesignation and transfer of Ms. Maxwell. Your office is in the best position to identify where responsive records are likely to reside, but at a minimum, a reasonable search for responsive records would include:
 - a. Office of the Attorney General;
 - b. Office of the Deputy Attorney General;
 - c. Office of the Pardon Attorney;
 - d. Federal Bureau of Prisons, Office of the Director;
 - e. Federal Bureau of Prisons, Office of Chief of Staff to the Director;
 - f. Federal Bureau of Prisons, Office of the Deputy Director;
 - g. Federal Bureau of Prisons; Office of the Regional Director for the Southeast Region;
 - h. Federal Bureau of Prisons; Office of the Regional Director for the South Central Region;
 - i. Federal Bureau of Prisons; Office of the Assistant Director for the Correctional Programs Division;
 - j. Federal Bureau of Prisons; Designation and Sentence Computation Center;
 - k. Federal Bureau of Prisons, Office of the Warden, FCI Tallahassee; and
 - l. Federal Bureau of Prisons; Office of the Warden, FPC Bryan.
2. All records reflecting requests, and the disposition of such requests, for waiver of any Public Safety Factors associated with Ms. Maxwell's designation or redesignation.
3. All records reflecting any decision to waive, as applied to Ms. Maxwell, the standard procedures for submissions of an inmate transfer request as detailed in Chapter 7 of the

Bureau of Prisons' Program Statement 5100.08, Inmate Security Designation and Custody Classification.

4. All records reflecting any transfer codes associated with Ms. Maxwell's redesignation and transfer.
5. All records reflecting Ms. Maxwell's security point score; custody level; and any requests for, applications of, and reasons for Management Variables associated with Ms. Maxwell's placement as of June 1, 2025.
6. All communications sent or received by the following custodians regarding Ghislaine Maxwell's transfer from FCI Tallahassee to FPC Bryan:
 - a. Pam Bondi, Attorney General;
 - b. Todd Blanche, Deputy Attorney General;
 - c. Emil Bove, Former Principal Associate Deputy Attorney General;
 - d. William Marshall, Director, Federal Bureau of Prisons;
 - e. Joshua Smith, Deputy Director, Federal Bureau of Prisons;
 - f. John Bartlett, Regional Director, Federal Bureau of Prisons;
 - g. Danon Colbert, Regional Director, Federal Bureau of Prisons;
 - h. Shane Salem, Assistant Director, Federal Bureau of Prisons;
 - i. The Administrator of the Federal Bureau of Prisons Designation and Sentence Computation Center;
 - j. The warden of FCI Tallahassee; and
 - k. The warden of FPC Bryan.

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

Fee Waiver Request

In accordance with 5 U.S.C. § 552(a)(4)(A)(iii) and 28 C.F.R. § 16.10(k), a waiver of fees associated with processing this request is appropriate. Disclosure of the requested information is in the public interest because it (i) would shed light on the operations or activities of the government; (ii) would contribute significantly to the general public's understanding of government operations and activities; and (iii) is necessary to carry out Congress's Article I oversight functions, as opposed to for a commercial purpose.

First, disclosure of the requested records would shed light on whether the Justice Department and BOP complied with appropriate regulations and procedures when transferring Ghislaine Maxwell. In July or August 2025, BOP transferred Ghislaine Maxwell from FCI Tallahassee to FPC Bryan, which would have required waiver of BOP protocols because of the nature of Maxwell's convictions. *See* Derek Hawkins, *Ghislaine Maxwell's move to 'country club' prison smacks of special treatment, experts say*, Wash. Post (Aug. 5, 2025), <https://www.washingtonpost.com/national-security/2025/08/05/trump-epstein-maxwell-sex-trafficking-prisons-corrections/>. Congress and the public have a strong interest in knowing the circumstances leading to Maxwell's transfer, including whether the Department of Justice and BOP followed standard regulations and whether the transfer was initiated in exchange for Maxwell's interview with Deputy Attorney General Todd Blanche roughly one week earlier.

Second, disclosure of the requested records would contribute significantly to the general public's understanding of the reasons for Maxwell's transfer and whether the transfer followed established procedures. This information is not already in the public domain, despite multiple congressional

oversight requests. Upon receipt of these records, we intend to disseminate pertinent information along with our analysis through publication on our offices' various platforms, which will enhance the public's understanding of the government's activities.

Third, the request is wholly for non-commercial purposes. Our Senate offices operate as part of the federal government. We seek the requested information not for commercial use, but to aid in congressional oversight, good government, and transparency for the American people.

Expedited Processing Request

Pursuant to 5 U.S.C. 552(a)(6)(E) and 28 C.F.R. § 16.5(e)(1)(ii) and (iv), expedited processing is warranted. Expedition is required when there is a compelling need for the requested information, including where requests involve urgency to inform the public concerning actual or alleged federal government activity or a matter of widespread and exceptional media interest in which there exist possible questions about the government's integrity that affect public confidence. We certify to be true and correct to the best of our knowledge that circumstances warranting expedited processing exist here.

First, Congress has the constitutional authority to legislate and conduct oversight and is entitled to the expeditious disclosure of information to facilitate those processes. The requested information relates to the propriety of Maxwell's transfer. Timely provision of this information is vital for Congress to perform its constitutionally mandated legislative and oversight functions to ensure that the Justice Department and BOP adhere to standard regulations and practices without regard to political considerations.

Second, it is urgent that the public know whether Maxwell received favorable treatment by the Justice Department and BOP in exchange for her interview with Deputy Attorney General Blanche. Upon receipt of these records, we intend to disseminate pertinent information along with our analysis through publication on our offices' various platforms.

Third, there is widespread and exceptional media interest in this matter, which, as explained above, raises questions about the government's integrity that affect public confidence. *See, e.g.,* Derek Hawkins, *Ghislaine Maxwell's move to 'country club' prison smacks of special treatment, experts say*, Wash. Post (Aug. 5, 2025), <https://www.washingtonpost.com/national-security/2025/08/05/trump-epstein-maxwell-sex-trafficking-prisons-corrections/>; Erica Orden, *Ghislaine Maxwell transferred to less restrictive prison after DOJ meeting*, Politico (Aug. 1, 2025), <https://www.politico.com/news/2025/08/01/ghislaine-maxwell-prison-doj-meeting-00488424>; Julia Bonavita et al., *Jeffrey Epstein accomplice Ghislaine Maxwell moved to new prison amid fight over answers, immunity*, Fox News (Aug. 1, 2025), <https://www.foxnews.com/us/jeffrey-epstein-accomplice-ghislaine-maxwell-moved-new-prison-amid-fight-over-answers-immunity>.

Guidance Regarding the Search & Processing of Requested Records

Please search for responsive records regardless of format, medium, or physical characteristics. In conducting the search, please construe the terms "record," "document," and "information" in their broadest sense, including any written, typed, recorded, graphic, printed, or audio or video material of any kind. Any request for "records" includes any attachments to those records or other materials enclosed with those records when they were previously transmitted. Any request for "communications" includes, but is not limited to, emails, letters, memoranda, calendar invitations, text messages, direct messages, and attachments thereto. To the extent that an email is responsive to a request, the 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.

FOIA requires agencies to disclose records to Congress that may otherwise be withheld from the public. 5 U.S.C. § 552(d). If it is your position that any of the requested documents are nonetheless exempted from disclosure requirements, please provide a *Vaughn* index as required by *Vaughn v. Rosen*, 484 F. 2d 820 (D.C. Cir. 1973); *see also Roth v. U.S. Dept. of Justice*, 642 F. 3d 1161, 1185 (D.C. Cir. 2011) (“Under our case law, agencies invoking a FOIA exemption must provide a specific, detailed explanation of why the exemption applies to the withheld materials.”). FOIA also requires agencies to release “any reasonably segregable portions” of documents that may be partially exempt and to prepare “an index relating any withheld portions to specific FOIA exemptions.” *Lykins v. U.S. Dept. of Justice*, 725 F.2d 1455, 1466 (D.C. Cir. 1984).

Where possible, please provide responsive material in an electronic format by email. Please send any responsive material being sent by email to Annie_Owens@judiciary-dem.senate.gov. Please send any material being mailed to Sheldon Whitehouse, 530 Hart Senate Office Building, Washington, D.C. 20510. If it will accelerate release of responsive records, please provide responsive material on a rolling basis.

Conclusion

We look forward to working with the Department of Justice to ensure the timely and exhaustive disclosure of all non-exempt records responsive to this request. If you have any questions regarding how to construe this request or believe that further discussions regarding search and processing would facilitate a more efficient production, please do not hesitate to contact us. If the request for a fee waiver is denied in part or in full, please contact our offices immediately. Thank you for your consideration.

Sincerely,



Sheldon Whitehouse
United States Senator
Ranking Member,
Subcommittee on Federal
Courts, Oversight, Agency
Action, and Federal Rights



Richard Blumenthal
United States Senator



Adam B. Schiff
United States Senator

United States Senate

WASHINGTON, DC 20510

November 21, 2025

Andrew Fiorillo
Chief, Initial Request Staff
Office of Information Policy
Office of the Attorney General
Office of the Deputy Attorney General
Department of Justice
441 G St. NW
Washington, DC 20530

Dear FOIA Officer:

Implicit in Article I of the Constitution is Congress's power of inquiry, which is an essential component of Congress's legislative and oversight functions. Concurrent with inquiries we have made to the Department of Justice pursuant to our Article I oversight authority, which have not yet received a response, we are submitting a parallel expedited request under the Freedom of Information Act, 5 U.S.C. § 552, and 28 C.F.R. Part 16, for the following records.

Requested Records

In July or August 2025, the Bureau of Prisons (BOP) transferred Ghislaine Maxwell from Federal Correctional Institution (FCI) Tallahassee to Federal Prison Camp (FPC) Bryan.

Please produce within twenty business days the following records:

1. All records reflecting requests, and the disposition of such requests, for the redesignation and transfer of Ms. Maxwell. Your office is in the best position to identify where responsive records are likely to reside, but at a minimum, a reasonable search for responsive records would include:
 - a. Office of the Attorney General;
 - b. Office of the Deputy Attorney General;
 - c. Office of the Pardon Attorney;
 - d. Federal Bureau of Prisons, Office of the Director;
 - e. Federal Bureau of Prisons, Office of Chief of Staff to the Director;
 - f. Federal Bureau of Prisons, Office of the Deputy Director;
 - g. Federal Bureau of Prisons; Office of the Regional Director for the Southeast Region;
 - h. Federal Bureau of Prisons; Office of the Regional Director for the South Central Region;
 - i. Federal Bureau of Prisons; Office of the Assistant Director for the Correctional Programs Division;
 - j. Federal Bureau of Prisons; Designation and Sentence Computation Center;
 - k. Federal Bureau of Prisons, Office of the Warden, FCI Tallahassee; and
 - l. Federal Bureau of Prisons; Office of the Warden, FPC Bryan.
2. All records reflecting requests, and the disposition of such requests, for waiver of any Public Safety Factors associated with Ms. Maxwell's designation or redesignation.

3. All records reflecting any decision to waive, as applied to Ms. Maxwell, the standard procedures for submissions of an inmate transfer request as detailed in Chapter 7 of the Bureau of Prisons' Program Statement 5100.08, Inmate Security Designation and Custody Classification.
4. All records reflecting any transfer codes associated with Ms. Maxwell's redesignation and transfer.
5. All records reflecting Ms. Maxwell's security point score; custody level; and any requests for, applications of, and reasons for Management Variables associated with Ms. Maxwell's placement as of June 1, 2025.
6. All communications sent or received by the following custodians regarding Ghislaine Maxwell's transfer from FCI Tallahassee to FPC Bryan:
 - a. Pam Bondi, Attorney General;
 - b. Todd Blanche, Deputy Attorney General;
 - c. Emil Bove, Former Principal Associate Deputy Attorney General;
 - d. William Marshall, Director, Federal Bureau of Prisons;
 - e. Joshua Smith, Deputy Director, Federal Bureau of Prisons;
 - f. John Bartlett, Regional Director, Federal Bureau of Prisons;
 - g. Danon Colbert, Regional Director, Federal Bureau of Prisons;
 - h. Shane Salem, Assistant Director, Federal Bureau of Prisons;
 - i. The Administrator of the Federal Bureau of Prisons Designation and Sentence Computation Center;
 - j. The warden of FCI Tallahassee; and
 - k. The warden of FPC Bryan.

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

Fee Waiver Request

In accordance with 5 U.S.C. § 552(a)(4)(A)(iii) and 28 C.F.R. § 16.10(k), a waiver of fees associated with processing this request is appropriate. Disclosure of the requested information is in the public interest because it (i) would shed light on the operations or activities of the government; (ii) would contribute significantly to the general public's understanding of government operations and activities; and (iii) is necessary to carry out Congress's Article I oversight functions, as opposed to for a commercial purpose.

First, disclosure of the requested records would shed light on whether the Justice Department and BOP complied with appropriate regulations and procedures when transferring Ghislaine Maxwell. In July or August 2025, BOP transferred Ghislaine Maxwell from FCI Tallahassee to FPC Bryan, which would have required waiver of BOP protocols because of the nature of Maxwell's convictions. *See* Derek Hawkins, *Ghislaine Maxwell's move to 'country club' prison smacks of special treatment, experts say*, Wash. Post (Aug. 5, 2025), <https://www.washingtonpost.com/national-security/2025/08/05/trump-epstein-maxwell-sex-trafficking-prisons-corrections/>. Congress and the public have a strong interest in knowing the circumstances leading to Maxwell's transfer, including whether the Department of Justice and BOP followed standard regulations and whether the transfer was initiated in exchange for Maxwell's interview with Deputy Attorney General Todd Blanche roughly one week earlier.

Second, disclosure of the requested records would contribute significantly to the general public's understanding of the reasons for Maxwell's transfer and whether the transfer followed established procedures. This information is not already in the public domain, despite multiple congressional oversight requests. Upon receipt of these records, we intend to disseminate pertinent information along with our analysis through publication on our offices' various platforms, which will enhance the public's understanding of the government's activities.

Third, the request is wholly for non-commercial purposes. Our Senate offices operate as part of the federal government. We seek the requested information not for commercial use, but to aid in congressional oversight, good government, and transparency for the American people.

Expedited Processing Request

Pursuant to 5 U.S.C. 552(a)(6)(E) and 28 C.F.R. § 16.5(e)(1)(ii) and (iv), expedited processing is warranted. Expedition is required when there is a compelling need for the requested information, including where requests involve urgency to inform the public concerning actual or alleged federal government activity or a matter of widespread and exceptional media interest in which there exist possible questions about the government's integrity that affect public confidence. We certify to be true and correct to the best of our knowledge that circumstances warranting expedited processing exist here.

First, Congress has the constitutional authority to legislate and conduct oversight and is entitled to the expeditious disclosure of information to facilitate those processes. The requested information relates to the propriety of Maxwell's transfer. Timely provision of this information is vital for Congress to perform its constitutionally mandated legislative and oversight functions to ensure that the Justice Department and BOP adhere to standard regulations and practices without regard to political considerations.

Second, it is urgent that the public know whether Maxwell received favorable treatment by the Justice Department and BOP in exchange for her interview with Deputy Attorney General Blanche. Upon receipt of these records, we intend to disseminate pertinent information along with our analysis through publication on our offices' various platforms.

Third, there is widespread and exceptional media interest in this matter, which, as explained above, raises questions about the government's integrity that affect public confidence. *See, e.g.,* Derek Hawkins, *Ghislaine Maxwell's move to 'country club' prison smacks of special treatment, experts say*, Wash. Post (Aug. 5, 2025), <https://www.washingtonpost.com/national-security/2025/08/05/trump-epstein-maxwell-sex-trafficking-prisons-corrections/>; Erica Orden, *Ghislaine Maxwell transferred to less restrictive prison after DOJ meeting*, Politico (Aug. 1, 2025), <https://www.politico.com/news/2025/08/01/ghislaine-maxwell-prison-doj-meeting-00488424>; Julia Bonavita et al., *Jeffrey Epstein accomplice Ghislaine Maxwell moved to new prison amid fight over answers, immunity*, Fox News (Aug. 1, 2025), <https://www.foxnews.com/us/jeffrey-epstein-accomplice-ghislaine-maxwell-moved-new-prison-amid-fight-over-answers-immunity>.

Guidance Regarding the Search & Processing of Requested Records

Please search for responsive records regardless of format, medium, or physical characteristics. In conducting the search, please construe the terms "record," "document," and "information" in their broadest sense, including any written, typed, recorded, graphic, printed, or audio or video material of any kind. Any request for "records" includes any attachments to those records or other materials enclosed with those records when they were previously transmitted. Any request for "communications" includes, but is not limited to, emails, letters, memoranda, calendar invitations, text messages, direct messages, and

attachments thereto. To the extent that an email is responsive to a request, the 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.

FOIA requires agencies to disclose records to Congress that may otherwise be withheld from the public. 5 U.S.C. § 552(d). If it is your position that any of the requested documents are nonetheless exempted from disclosure requirements, please provide a *Vaughn* index as required by *Vaughn v. Rosen*, 484 F. 2d 820 (D.C. Cir. 1973); *see also Roth v. U.S. Dept. of Justice*, 642 F. 3d 1161, 1185 (D.C. Cir. 2011) (“Under our case law, agencies invoking a FOIA exemption must provide a specific, detailed explanation of why the exemption applies to the withheld materials.”). FOIA also requires agencies to release “any reasonably segregable portions” of documents that may be partially exempt and to prepare “an index relating any withheld portions to specific FOIA exemptions.” *Lykins v. U.S. Dept. of Justice*, 725 F.2d 1455, 1466 (D.C. Cir. 1984).

Where possible, please provide responsive material in an electronic format by email. Please send any responsive material being sent by email to Annie_Owens@judiciary-dem.senate.gov. Please send any material being mailed to Sheldon Whitehouse, 530 Hart Senate Office Building, Washington, D.C. 20510. If it will accelerate release of responsive records, please provide responsive material on a rolling basis.

Conclusion

We look forward to working with the Department of Justice to ensure the timely and exhaustive disclosure of all non-exempt records responsive to this request. If you have any questions regarding how to construe this request or believe that further discussions regarding search and processing would facilitate a more efficient production, please do not hesitate to contact us. If the request for a fee waiver is denied in part or in full, please contact our offices immediately. Thank you for your consideration.

Sincerely,



Sheldon Whitehouse
United States Senator
Ranking Member,
Subcommittee on Federal
Courts, Oversight, Agency
Action, and Federal Rights



Richard Blumenthal
United States Senator



Adam B. Schiff
United States Senator

United States Senate

WASHINGTON, DC 20510

November 21, 2025

Rosalind Sargent-Burns,
Senior Deputy Attorney
Office of the Pardon Attorney
Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530

Dear FOIA Officer:

Implicit in Article I of the Constitution is Congress's power of inquiry, which is an essential component of Congress's legislative and oversight functions. Concurrent with inquiries we have made to the Department of Justice pursuant to our Article I oversight authority, which have not yet received a response, we are submitting a parallel expedited request under the Freedom of Information Act, 5 U.S.C. § 552, and 28 C.F.R. Part 16, for the following records.

Requested Records

In July or August 2025, the Bureau of Prisons (BOP) transferred Ghislaine Maxwell from Federal Correctional Institution (FCI) Tallahassee to Federal Prison Camp (FPC) Bryan.

Please produce within twenty business days the following records:

1. All records reflecting requests, and the disposition of such requests, for the redesignation and transfer of Ms. Maxwell. Your office is in the best position to identify where responsive records are likely to reside, but at a minimum, a reasonable search for responsive records would include:
 - a. Office of the Attorney General;
 - b. Office of the Deputy Attorney General;
 - c. Office of the Pardon Attorney;
 - d. Federal Bureau of Prisons, Office of the Director;
 - e. Federal Bureau of Prisons, Office of Chief of Staff to the Director;
 - f. Federal Bureau of Prisons, Office of the Deputy Director;
 - g. Federal Bureau of Prisons; Office of the Regional Director for the Southeast Region;
 - h. Federal Bureau of Prisons; Office of the Regional Director for the South Central Region;
 - i. Federal Bureau of Prisons; Office of the Assistant Director for the Correctional Programs Division;
 - j. Federal Bureau of Prisons; Designation and Sentence Computation Center;
 - k. Federal Bureau of Prisons, Office of the Warden, FCI Tallahassee; and
 - l. Federal Bureau of Prisons; Office of the Warden, FPC Bryan.
2. All records reflecting requests, and the disposition of such requests, for waiver of any Public Safety Factors associated with Ms. Maxwell's designation or redesignation.
3. All records reflecting any decision to waive, as applied to Ms. Maxwell, the standard procedures for submissions of an inmate transfer request as detailed in Chapter 7 of the

Bureau of Prisons' Program Statement 5100.08, Inmate Security Designation and Custody Classification.

4. All records reflecting any transfer codes associated with Ms. Maxwell's redesignation and transfer.
5. All records reflecting Ms. Maxwell's security point score; custody level; and any requests for, applications of, and reasons for Management Variables associated with Ms. Maxwell's placement as of June 1, 2025.
6. All communications sent or received by the following custodians regarding Ghislaine Maxwell's transfer from FCI Tallahassee to FPC Bryan:
 - a. Pam Bondi, Attorney General;
 - b. Todd Blanche, Deputy Attorney General;
 - c. Emil Bove, Former Principal Associate Deputy Attorney General;
 - d. William Marshall, Director, Federal Bureau of Prisons;
 - e. Joshua Smith, Deputy Director, Federal Bureau of Prisons;
 - f. John Bartlett, Regional Director, Federal Bureau of Prisons;
 - g. Danon Colbert, Regional Director, Federal Bureau of Prisons;
 - h. Shane Salem, Assistant Director, Federal Bureau of Prisons;
 - i. The Administrator of the Federal Bureau of Prisons Designation and Sentence Computation Center;
 - j. The warden of FCI Tallahassee; and
 - k. The warden of FPC Bryan.

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

Fee Waiver Request

In accordance with 5 U.S.C. § 552(a)(4)(A)(iii) and 28 C.F.R. § 16.10(k), a waiver of fees associated with processing this request is appropriate. Disclosure of the requested information is in the public interest because it (i) would shed light on the operations or activities of the government; (ii) would contribute significantly to the general public's understanding of government operations and activities; and (iii) is necessary to carry out Congress's Article I oversight functions, as opposed to for a commercial purpose.

First, disclosure of the requested records would shed light on whether the Justice Department and BOP complied with appropriate regulations and procedures when transferring Ghislaine Maxwell. In July or August 2025, BOP transferred Ghislaine Maxwell from FCI Tallahassee to FPC Bryan, which would have required waiver of BOP protocols because of the nature of Maxwell's convictions. *See* Derek Hawkins, *Ghislaine Maxwell's move to 'country club' prison smacks of special treatment, experts say*, Wash. Post (Aug. 5, 2025), <https://www.washingtonpost.com/national-security/2025/08/05/trump-epstein-maxwell-sex-trafficking-prisons-corrections/>. Congress and the public have a strong interest in knowing the circumstances leading to Maxwell's transfer, including whether the Department of Justice and BOP followed standard regulations and whether the transfer was initiated in exchange for Maxwell's interview with Deputy Attorney General Todd Blanche roughly one week earlier.

Second, disclosure of the requested records would contribute significantly to the general public's understanding of the reasons for Maxwell's transfer and whether the transfer followed established procedures. This information is not already in the public domain, despite multiple congressional

oversight requests. Upon receipt of these records, we intend to disseminate pertinent information along with our analysis through publication on our offices' various platforms, which will enhance the public's understanding of the government's activities.

Third, the request is wholly for non-commercial purposes. Our Senate offices operate as part of the federal government. We seek the requested information not for commercial use, but to aid in congressional oversight, good government, and transparency for the American people.

Expedited Processing Request

Pursuant to 5 U.S.C. 552(a)(6)(E) and 28 C.F.R. § 16.5(e)(1)(ii) and (iv), expedited processing is warranted. Expedition is required when there is a compelling need for the requested information, including where requests involve urgency to inform the public concerning actual or alleged federal government activity or a matter of widespread and exceptional media interest in which there exist possible questions about the government's integrity that affect public confidence. We certify to be true and correct to the best of our knowledge that circumstances warranting expedited processing exist here.

First, Congress has the constitutional authority to legislate and conduct oversight and is entitled to the expeditious disclosure of information to facilitate those processes. The requested information relates to the propriety of Maxwell's transfer. Timely provision of this information is vital for Congress to perform its constitutionally mandated legislative and oversight functions to ensure that the Justice Department and BOP adhere to standard regulations and practices without regard to political considerations.

Second, it is urgent that the public know whether Maxwell received favorable treatment by the Justice Department and BOP in exchange for her interview with Deputy Attorney General Blanche. Upon receipt of these records, we intend to disseminate pertinent information along with our analysis through publication on our offices' various platforms.

Third, there is widespread and exceptional media interest in this matter, which, as explained above, raises questions about the government's integrity that affect public confidence. *See, e.g.,* Derek Hawkins, *Ghislaine Maxwell's move to 'country club' prison smacks of special treatment, experts say*, Wash. Post (Aug. 5, 2025), <https://www.washingtonpost.com/national-security/2025/08/05/trump-epstein-maxwell-sex-trafficking-prisons-corrections/>; Erica Orden, *Ghislaine Maxwell transferred to less restrictive prison after DOJ meeting*, Politico (Aug. 1, 2025), <https://www.politico.com/news/2025/08/01/ghislaine-maxwell-prison-doj-meeting-00488424>; Julia Bonavita et al., *Jeffrey Epstein accomplice Ghislaine Maxwell moved to new prison amid fight over answers, immunity*, Fox News (Aug. 1, 2025), <https://www.foxnews.com/us/jeffrey-epstein-accomplice-ghislaine-maxwell-moved-new-prison-amid-fight-over-answers-immunity>.

Guidance Regarding the Search & Processing of Requested Records

Please search for responsive records regardless of format, medium, or physical characteristics. In conducting the search, please construe the terms "record," "document," and "information" in their broadest sense, including any written, typed, recorded, graphic, printed, or audio or video material of any kind. Any request for "records" includes any attachments to those records or other materials enclosed with those records when they were previously transmitted. Any request for "communications" includes, but is not limited to, emails, letters, memoranda, calendar invitations, text messages, direct messages, and attachments thereto. To the extent that an email is responsive to a request, the 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.

FOIA requires agencies to disclose records to Congress that may otherwise be withheld from the public. 5 U.S.C. § 552(d). If it is your position that any of the requested documents are nonetheless exempted from disclosure requirements, please provide a *Vaughn* index as required by *Vaughn v. Rosen*, 484 F. 2d 820 (D.C. Cir. 1973); *see also Roth v. U.S. Dept. of Justice*, 642 F. 3d 1161, 1185 (D.C. Cir. 2011) (“Under our case law, agencies invoking a FOIA exemption must provide a specific, detailed explanation of why the exemption applies to the withheld materials.”). FOIA also requires agencies to release “any reasonably segregable portions” of documents that may be partially exempt and to prepare “an index relating any withheld portions to specific FOIA exemptions.” *Lykins v. U.S. Dept. of Justice*, 725 F.2d 1455, 1466 (D.C. Cir. 1984).

Where possible, please provide responsive material in an electronic format by email. Please send any responsive material being sent by email to Annie_Owens@judiciary-dem.senate.gov. Please send any material being mailed to Sheldon Whitehouse, 530 Hart Senate Office Building, Washington, D.C. 20510. If it will accelerate release of responsive records, please provide responsive material on a rolling basis.

Conclusion

We look forward to working with the Department of Justice to ensure the timely and exhaustive disclosure of all non-exempt records responsive to this request. If you have any questions regarding how to construe this request or believe that further discussions regarding search and processing would facilitate a more efficient production, please do not hesitate to contact us. If the request for a fee waiver is denied in part or in full, please contact our offices immediately. Thank you for your consideration.

Sincerely,



Sheldon Whitehouse
United States Senator
Ranking Member,
Subcommittee on Federal
Courts, Oversight, Agency
Action, and Federal Rights



Richard Blumenthal
United States Senator



Adam B. Schiff
United States Senator