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U.S. Department of Education

Office of the Chief Privacy Officer

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Sent via Federal Express and electronic mail

Subject: Freedom of Information Act Request

Dear FOIA Officers:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552 *et seq.*, and applicable agency regulations, the Center for Constitutional Rights (“CCR”) (“Requester”) submits a request for records from the U.S. Department of Education (the “Agency”) (the “Request”). Please direct this request to all appropriate offices, field offices, departments, bureaus, missions, and officials within the Agency, including but not limited to the Office of the Secretary and the Office of Civil Rights.

A. Background/Purpose of Request

This Request seeks records and communications pertaining to how the Agency interprets and plans to enforce recent Executive Orders impacting lesbian, gay, bisexual, transgender, non-binary, gender nonconforming, intersex, queer, and asexual (collectively, “LGBTQIA+”) individuals. The Request seeks these documents from the period starting January 20, 2025 continuing through to the time this request is reviewed.

Since President Donald Trump’s inauguration on January 20, 2025, he has released various Executive Orders specifically targeting LGBTQIA+ individuals, and the governmental and non-governmental actors that serve them, including healthcare providers, researchers, and even law firms.¹ The vagueness of the Executive Orders have caused widespread fear among LGBTQIA+ Americans concerned about their access to healthcare,² ability to use restrooms and school locker

¹ Ivana Saric, *All of the anti-trans executive orders Trump has signed*, AXIOS (Feb. 5, 2025), <https://www.axios.com/2025/02/05/anti-trans-executive-orders-trump>; Geoff Mulvihill, *6 ways Trump’s executive orders are targeting transgender people*, PBS NEWS (Feb. 1, 2025), <https://www.pbs.org/newshour/politics/6-ways-trumps-executive-orders-are-targeting-transgender-people>.

² Caroline Medina, Gray Babbs, Sara Mar, Jaclyn M.W. Hughto & Elizabeth Tobin-Tyler, *What Do The Trump Executive Orders Mean For The Health Of Trans Americans?*, HEALTH AFFS. (Feb. 13, 2025), <https://www.healthaffairs.org/content/forefront/do-trump-executive-orders-mean-health-trans-americans>.

rooms,³ play on their school sports teams,⁴ travel abroad,⁵ serve in the military or access benefits associated with their service,⁶ or receive safe housing placements when in federal custody or federally managed social services and homelessness programs.⁷ The Executive Orders have also unleashed additional harms to LGBTQIA+ people of color, as well as people living with HIV/AIDS.⁸ These Executive Orders appear to be an expression of the Presidential administration's animus towards LGBTQIA+ Americans,⁹ even though it is well-settled that pure animus against an unpopular group may never serve legitimate governmental interests.¹⁰

Against this background, Requester is deeply concerned about the widespread deleterious impacts the Agency's implementation of these Executive Orders will have on an already marginalized population. CCR has historically represented LGBTQIA+ clients. We seek the information that is the subject of this Request in order to better advise our clients in this moment of heightened precarity and confusion, and to prepare the LGBTQIA+ public for how the Agency plans to interpret and enforce these Executive Orders, and how that enforcement may impact their lives or inform their choices. We also seek this information in order to better understand the rationales and motives behind agency actions and interpretations of these Executive Orders, especially if those interpretations or enforcement actions are discriminatory in practice or intent. Our interests in these records are rooted in a desire for government transparency.

B. Definitions

- **Record(s).** In this Request the term "Record(s)" includes, but is not limited to, all records or communications preserved in electronic (including metadata) or hardcopy form, such as correspondences, emails, documents, data, videotapes, audio tapes, faxes, files, guidance,

³ Brooke Migdon & Rebecca Beitsch, *Federal agencies ordered to implement transgender bathroom ban*, THE HILL (Jan. 30, 2025), <https://thehill.com/homenews/lgbtq/5117077-trump-transgender-bathroom-ban-opm-gender-ideology/>.

⁴ Will Graves, *Trump signs executive order intended to bar transgender athletes from girls' and women's sports*, AP NEWS (Feb. 5, 2025), <https://apnews.com/article/donald-trump-transgender-athletes-3606411fc12efffec95a893351624e1b>.

⁵ Jaclyn Diaz, *Trump's passport policy leaves trans, intersex Americans in the lurch*, NPR (Feb. 21, 2025), <https://www.npr.org/2025/02/21/nx-s1-5300880/trump-passport-policy-trans-gender-intersex-nonbinary>.

⁶ Scott Neuman, *Pentagon plans to begin removing trans service members from the military next month*, NPR, (Mar. 1, 2025), <https://www.npr.org/2025/02/27/g-s1-51057/transgender-soldiers-military-ban-trump>.

⁷ Beth Schwartzapfel, *Trump's executive order sows confusion for transgender federal prisoners*, THE 19TH (Feb. 11, 2025), <https://19thnews.org/2025/02/trump-trans-order-federal-prisoners/>; Press Release, U.S. Dep't of Hous. & Urban Dev., Secretary Scott Turner Halts Enforcement Actions of HUD's Gender Identity Rule (Feb. 10, 2025), <https://www.hud.gov/news/hud-no-25-026>; see also HUDChannel, *Secretary Turner Halts Enforcement Actions of Gender Identity Rule*, YouTube (Feb. 10, 2025), <https://www.youtube.com/watch?v=VyTGFmDtyTI>.

⁸ Samantha Riedel, *NIH Orders Researchers to Halt HIV Prevention Program for Trans Youth of Color*, THEM (Feb. 5, 2025), <https://www.them.us/story/nih-orders-researchers-halt-hiv-prevention-program-trans-youth-of-color>; Leah Feiger et al., *The CDC Has Been Gutted*, WIRED (Apr. 1, 2025), <https://www.wired.com/story/cdc-gutted-rif/>.

⁹ Bill Barrow, *Trump and Vance make anti-transgender attacks central to their campaign's closing argument*, AP NEWS (Nov. 1, 2024), <https://apnews.com/article/trump-harris-transgender-politics-61cff97a64fac581ffc5f762be4c57d3>; Odette Yousef, *Trump's anti-trans effort is an agenda cornerstone with echoes in history*, NPR (Feb. 6, 2025), <https://www.npr.org/2025/02/06/nx-s1-5288145/trump-anti-trans-executive-order/>.

¹⁰ See, e.g., *Dep't of Agric. v. Moreno*, 413 U.S. 528 (1973); *City of Cleburne v. Cleburne Living Ctr., Inc.*, 473 U.S. 432 (1985); *Romer v. Evans*, 517 U.S. 620 (1996).

guidelines, evaluations, instructions, analyses, memoranda, agreements, notes, orders, policies, procedures, legal opinions, protocols, reports, rules, talking points, technical manuals, technical specifications, training manuals, studies, or any other record of any kind.

- **Communication(s).** In this Request, the term “Communication” means the transmittal of information (in the forms of facts, ideas, inquiries, or otherwise), including but not limited to emails, texts, voicemails, faxes, letters, messages including Microsoft Teams/Zoom/Slack/Signal/WhatsApp messages, and/or any other type of electronic or non-electronic communication.
- **Data Compilations(s).** In this Request, the term “Data Compilation” means any aggregation, summary, table, list, spreadsheet, report, extract, or other assembled presentation of data—whether structured or unstructured—that reflects or is derived from one or more data systems, databases, tracking tools, forms, logs, case management software, or electronic records maintained or accessed by the agency.
- **Agency.** In this request, the term “Agency” means the Department of Education and each of its divisions, departments, field offices, secretaries, directors, commissioners, employees, agents, representatives, consultants, contractors, personnel, and any other person authorized to act on its behalf.
- **Designated Custodians.** In this request, unless otherwise specified for a respective Agency, this term means persons who have held the following positions since January 20, 2025 at the Department of Education, in an acting, interim, or Senate-confirmed capacity: Director, Chair, Secretary, Head (or equivalent employee level within the agency regardless of official title); the Vice Chair, Deputy Secretary, or Deputy Head; Commissioners; Deputy Commissioner; Chiefs of Staff; and Undersecretaries or Assistance Secretaries (or equivalent employee level within the agency regardless of official title); General Counsel; Deputy General Counsel; Inspector General(s); District Director(s); Human Capital Officers; Human Resource Officers; and all employees in positions classified as either Senior Executive Service officials and/or above General Schedule (GS) grade 15.
- **LGBTQIA+.** In this request, the term “LGBTQIA+” refers to all of the following: people who are gay, lesbian, bisexual, pansexual, trans, transgender, two-spirit, non-binary, gender non-conforming, intersex, asexual, and/or queer.

C. Limitations on Time and Scope, and Search Terms

The time period for this Request is from January 20, 2025 to Present (i.e., the date when the searches commence). In addition, all requests for Records and Communications are limited to Records and Communications in the possession of the Designated Custodians except where otherwise indicated.

To facilitate Communications searches, the Requester proposes the following search terms (including plurals, hyphenations, and common variations): “gay”; “lesbian”; “bisexual”; “transgender”; “tranny”; “trannies”; “transsexual”; “transvestite”; “gender”; “DEI”; “DEIA”;

“diversity”; “biological”; “sexual orientation”; “intersex”; “LGBT”; “LGBTQ”; “LGBTQIA”; “nonbinary”; “Bostock”; “Skrimmetti”; “mutilation”; “gender ideology”; “gender identity”; “gender expression”; “sex change”; “sex-trait modification”; “affirming care”; “pronouns”; “indoctrination”; “they/them”; and “mother and father” (collectively, “Proposed Search Terms”).

D. Request for Information

1. Any policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records related to the Agency’s interpretation, implementation, and/or enforcement of the following Executive Orders and guidance (hereinafter “Designated Executive Orders and Guidance”):
 - a. Executive Order titled *Protecting Children from Chemical and Surgical Mutilation* (January 2025) ([Link](#))
 - b. Executive Order titled *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* (“Defending Women Executive Order”) (January 2025) ([Link](#))
 - c. Executive Order titled *Ending Radical and Wasteful Government DEI Programs and Preferencing* (“DEI Executive Order”) (January 2025) ([Link](#))
 - d. Office of Personnel Management Memorandum: *Initial Guidance Regarding Trump Executive Order on Defending Women* (“OPM Guidance”) (January 2025) ([Link](#))
 - e. Executive Order titled *Radical Indoctrination in K-12 Schooling* (January 2025) ([Link](#))
 - f. Executive Order titled *Keeping Men Out of Women’s Sports* (February 2025) ([Link](#))
 - g. Executive Order titled *Eradicating Anti-Christian Bias* (February 2025) ([Link](#))
 - h. Executive Order titled *Improving Education Outcomes by Empowering Parents, States, and Communities* (March 2025) ([Link](#))
2. All Communications related to the interpretation, implementation, and/or enforcement of the Designated Executive Orders and Guidance and/or records responsive to Request No. 1 above, including without limitation Agency compliance actions or plans.
3. All Records or Communications related to the removal or modification of Agency websites¹¹ in connection with the Designated Executive Orders and Guidance, including but not limited to:
 - a. the criteria, search terms, or keywords used;
 - b. policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records;
 - c. any Data Compilations identifying Agency websites so modified.

¹¹ Examples of such words that have been reportedly removed from public government websites such as but not limited to “transgender,” “pregnant person,” “intersex,” and “queer.” See, e.g., Jonathan Cooper, *A list of government web pages that have gone dark to comply with Trump orders*, AP NEWS (Jan. 31, 2025), <https://apnews.com/article/government-websites-changes-trump-transgender-dei-orders-383fc983c6ca48804f1404cbc61ee9e9>; Julie Steenhuysen & Ted Hesson, *US health agencies scrubbing websites to remove ‘gender ideology’*, REUTERS (Jan. 31, 2025), <https://www.reuters.com/world/us/us-health-agencies-scrubbing-websites-remove-gender-ideology-2025-01-31/>.

4. Any Data Compilations related to the Agency's compliance with the Designated Executive Orders and Guidance, including internal assessments, reports, or tracking mechanisms.
5. Records related to any investigations or enforcement actions initiated by the Agency since January 20, 2025 against non-governmental entities (e.g., school districts, school athletic associations) in connection with the Designated Executive Orders and Guidance,¹² including without limitation:
 - a. Records identifying the entity subject to investigation;¹³
 - b. the subject matter or nature of such investigations or enforcement actions;
 - c. The dates such investigations or enforcement actions were opened;
 - d. The components or offices within the Agency responsible for the investigations or enforcement actions; and
 - e. The current status of each matter (e.g., open, closed, resolved, referred).
6. All Records and Communications between the Designated Custodians and Agency personnel related to the modification, nonrenewal, or termination of Agency grants or funding pursuant to the Designated Executive Orders and Guidance, including but not limited to:
 - a. the criteria, search terms or keywords used;
 - b. the rationale for all such terminations of funding, including the relevant Executive Order(s);
 - c. instructions given to Agency personnel related to grantee communications;
 - d. any templates used for termination letters.
7. A list of grantees who received grant or funding termination letters pursuant to the Designated Executive Orders and Guidance identifying:
 - a. the name of the grantee;¹⁴
 - b. the project name;
 - c. the number or other agency identifier;
 - d. the grant amount;
 - e. and the basis for the grant termination where available.
8. Any policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records related to the modification, elimination, or rescission of agency departments, initiatives, programs, priorities, task forces, committees, and/or budgets pursuant to the Designated Executive Orders and Guidance.

¹² See, e.g., Cecilia Kang, *F.C.C. Chairman Orders Inquiry Into Disney's D.E.I. Practices*, N.Y. TIMES (Mar. 28, 2025), <https://www.nytimes.com/2025/03/28/technology/disney-fcc-dei-investigation.html>; U.S. Equal Emp. Opp. Comm'n (EEOC), *EEOC Acting Chair Andrea Lucas Sends Letters to 20 Law Firms Requesting Information About DEI-Related Employment Practices*, EEOC (Mar. 17, 2025), <https://www.eeoc.gov/newsroom/eeoc-acting-chair-andrea-lucas-sends-letters-20-law-firms-requesting-information-about-dei>.

¹³ Requester is not seeking any personal identifying information for any individual grantees, but seek the names of grantees that are organizations, institutions, or educational programs, etc.

¹⁴ Requester is not seeking any personal identifying information for any individual grantees, but seek the names of grantees that are organizations, institutions, or educational programs, etc.

9. All Communications including the Proposed Search Terms.
10. All Records of responses submitted to the box titled “Please describe in as much detail as possible the discriminatory practice taking place:” on the “End DEI” website (<https://enddei.ed.gov/>) that (1) include the Proposed Search Terms and (2) are under review by the Agency for further investigation.
11. All Records related to Christopher Trainor and/or the Agency’s implementation or enforcement of the *Radical Indoctrination in K-12 Schooling* Executive Order, including but not limited to memos authored by Craig Trainor.
12. List(s) of criteria (e.g., search words, key terms, internal agency identifiers or filters) used to determine programs for which the Agency will terminate or alter funding per the *Improving Education Outcomes by Empowering Parents, States, and Communities* Executive Order.

E. The Requester

The Center for Constitutional Rights (“CCR”) is a non-profit, public-interest legal and advocacy organization that engages in the fields of civil and international human rights. CCR’s diverse issue areas include litigation and advocacy around gender and LGBTQIA+ justice and prisoners’ rights. One of CCR’s primary activities is the publication of newsletters, know-your-rights handbooks, legal analysis of current gender justice and LGBTQIA+ rights law issues, and other similar materials for public dissemination. These and other materials are available through CCR’s Development, Communications, and Advocacy Departments. CCR operates a website, <http://ccrjustice.org>, which addresses the issues on which CCR works. CCR staff members often serve as sources for journalists and media outlets, including on issues related to gender and LGBTQIA+ justice, civil liberties, and prisoners’ rights. In addition, CCR regularly issues press releases, has an active social media presence with tens of thousands of followers, and issues regular email updates sent to over 50,000 supporters about developments and news pertaining to CCR’s work. CCR publishes and distributes the Jailhouse Lawyers Handbook, a self-help legal manual for incarcerated people to challenge rights violations and abuses.

F. Request for Fee Waiver

The Requester requests a waiver of all fees associated with this Request pursuant to 5 U.S.C. § 552(a)(4)(A)(iii). Requester is a nonprofit organization (see Section C of this Request) seeking the requested information in the public interest and not for commercial purposes. Requester meets the requirements for a fee waiver because the subject of the request concerns the operations or activities of the government, the disclosure of the information is likely to contribute to a significant public understanding of government operations or activities, Requester’s primary interest is in disclosure, and they have no commercial interest in the information. *See* 22 C.F.R. § 171.16(j).

Requester will make any information that it receives as a result of this FOIA request available to the public, including the press, at no cost. Disclosure in this case, therefore, meets the statutory

criteria, and a fee waiver would fulfill Congress' legislative intent in amending FOIA. *See Judicial Watch Inc. v. Rossotti*, 326 F.3d 1309, 1312 (D.C. Cir. 2003) ("Congress amended FOIA to ensure that it be 'liberally construed in favor of waivers of noncommercial requesters.'") (citing *McClellan Ecological Seepage Situation v. Carlucci*, 835 F.2d 1282, 1284 (9th Cir. 1987)).

In the alternative, if no fee waiver is granted and the fees exceed \$250.00, please contact Requester's undersigned representative to obtain consent to incur additional fees. Processing fees should be limited pursuant to 5 U.S.C. § 552(a)(4)(A)(ii)(II) ("[F]ees shall be limited to reasonable standard charges for document duplication when records are not sought for commercial use and the request is made by . . . a representative of the news media").

G. Request for Expedited Processing

Requester requests expedited processing of this FOIA Request pursuant to 5 U.S.C. § 552(a)(6)(E), 39 C.F.R. § 3006.200(e), as the requested information concerns matters of widespread public interest and urgency related to federal policy changes impacting civil rights, healthcare access, and gender-related protections. Accordingly, Requester requests an expedited processing determination within 10 days of the receipt of this FOIA Request on the ground that there is an immediate and compelling need for the information.

There is an urgent need to inform the public of the policies and decision-making regarding Agency enforcement of the Designated Executive Orders and Guidance. In just three months, the administration's Executive Orders and agencies' enforcement of these Orders have already generated substantial and continuing news coverage. *Every* major outlet is covering this administration's impacts on LGBTQIA+ people, such as the New York Times,¹⁵ the Guardian,¹⁶ Reuters,¹⁷ NBC News,¹⁸ the Washington Post,¹⁹ the Wall Street Journal,²⁰ AP News,²¹ and the BBC.²²

¹⁵ Talya Minsberg, *What We Know About Trump's New Executive Order on Trans Athletes*, N.Y. TIMES (Feb. 5, 2025), <https://www.nytimes.com/2025/02/05/us/politics/trump-trans-athletes-executive-order.html>.

¹⁶ Dorothy Hastings, *Trans soldiers served their country. Now the US is rolling back their healthcare*, THE GUARDIAN (Apr. 2, 2025), <https://www.theguardian.com/us-news/2025/apr/02/trans-soldiers-veterans-healthcare>.

¹⁷ Jarrett Renshaw & David Shepardson, *Trump orders agencies to scrub 'gender ideology' from contracts, websites*, REUTERS (Jan. 29, 2025), <https://www.reuters.com/world/us/trump-orders-agencies-scrub-gender-ideology-contracts-websites-2025-01-30/>.

¹⁸ Brooke Sopelsa, Jo Yurcaba & Katrina Lambert, *Trump signs executive order banning trans women from women's sports*, NBC NEWS (Feb. 5, 2025), <https://www.nbcnews.com/nbc-out/out-politics-and-policy/trump-executive-order-ban-trans-women-sports-rcna190767>.

¹⁹ Tobi Raji, *Judge blocks Trump's orders to curb youth gender transition care*, WASH. POST (Mar. 1, 2025), <https://www.washingtonpost.com/nation/2025/03/01/judge-blocks-trumps-orders-curb-youth-gender-transition-care/>.

²⁰ Mariah Timms & Laura Kusisto, *Trump's Lightning-Speed Rollback of Transgender Rights Sparks Lawsuits*, WALL STREET JOURNAL (Feb. 5, 2025), <https://www.wsj.com/us-news/law/trumps-lightning-speed-rollback-of-transgender-rights-sparks-lawsuits-53f116a5>.

²¹ Geoff Mulvihill & Jesse Bedayn, *Under the new Trump administration, this year's Transgender Day of Visibility has a different tenor*, AP NEWS (Mar. 31, 2025), <https://apnews.com/article/transgender-visibility-trump-orders-2f949cdab2673e3becdfc3d213158aa9>.

²² Mike Wendling & Kayla Epstein, *Trump makes 'two sexes' official and scraps DEI policies*, BBC (Jan. 20, 2025), <https://www.bbc.com/news/articles/czx84en1yp4o>.

The impact of the Designated Executive Orders and Guidance on the lives of LGBTQIA+ people cannot be understated, as news coverage has highlighted. For example, the rehousing of transgender, gender non-conforming, nonbinary, and/or intersex people under Bureau of Prisons custody to facilities designated for their sex assigned at birth places those inmates—who are already at heightened risk when incarcerated—in immediate greater physical danger.²³ And while the constitutionality of several of the Designated Executive Orders and Guidance is being challenged in federal court, the Executive Orders have nonetheless emboldened state legislators to introduce—and pass—a flurry of legislation aimed at further curtailing the rights of LGBTQIA+ people, and particularly the rights and safety of LGBTQIA+ youth.²⁴

The speed with which legal protections for LGBTQIA+ people have been revoked raises serious concerns, and the numerosity and breadth of the Designated Executive Orders and Guidance has resulted in far-reaching panic and confusion within the LGBTQIA+ community, while simultaneously unleashing new waves of violence and bigotry against community members. LGBTQIA+ people also lack sufficient information to plan for their basic safety and wellbeing. The Trump Administration’s actions targeting LGBTQIA+ people have sparked national protest and demonstrations,²⁵ including gatherings dedicated to educating LGBTQIA+ people on “survival skills” in the face of the continued curtailment of their legal rights.²⁶

Requester is primarily engaged in disseminating information and is entitled to prompt and efficient responses to the request for information. This information will allow millions of LGBTQIA+ people who are waiting with bated breath to see what their lives will look like tomorrow to better prepare and plan for critical considerations, such as their continued access to life-saving healthcare. This will also better enable Requester, which regularly represents LGBTQIA+ clients, to advise their clients on their rights under the current law. Lastly, the expedient provision of this information will allow the American public to better understand the motivations and rationales behind the wholesale revocation of legal protections from a class of people.

H. Preferred Format and Delivery

²³ Mattathias Schwartz, Amy Harmon, Shaila Dewan & Glenn Thrush, *Prison Officials Detail Treatment of Trans Inmates Under Trump Gender Order*, N.Y. TIMES (Feb. 21, 2025), <https://www.nytimes.com/2025/02/21/us/trump-trans-women-prison.html> (“Federal data show that transgender prisoners are 10 times as likely as other inmates to report being sexually abused”).

²⁴ American Civil Liberties Union, *Mapping Attacks on LGBTQ Rights in U.S. State Legislatures in 2025*, ACLU (Mar. 14, 2025), <https://www.aclu.org/legislative-attacks-on-lgbtq-rights-2025>.

²⁵ See, e.g., Alyce McFadden, Nell Gallogly & Wesley Parnell, *Amid Concern Over Trump Order, New Yorkers Rally to Support Trans Youth*, N.Y. TIMES (Feb. 8, 2025), <https://www.nytimes.com/2025/02/08/nyregion/nyc-trans-health-care-youth-protest.html>; Samantha Lim, *LGBTQ Activists Rally at Newsom’s Home, Demand Stronger Trans Rights Commitment*, KQED (Apr. 1, 2025), <https://www.kqed.org/news/12033818/lgbtq-activists-rally-at-newsoms-home-demand-stronger-trans-rights-commitment>; Sophie Rosenthal & Matt Gregory, *Trans Day of Visibility Rally comes to the National Mall Monday afternoon*, WUSA9 (Mar. 31, 2025), <https://www.wusa9.com/article/life/pride-matters/trans-day-of-visibility-rally-washington-dc/65-ad614a57-ee7f-4b3f-95d5-58eab843ce3c>.

²⁶ Nastia Voynovskaya, *Trans Folks to Share Survival Skills in the Tenderloin for Trans Day of Visibility*, KQED (Mar. 27, 2025), <https://www.kqed.org/arts/13973671/trans-day-of-visibility-san-francisco-tenderloin>.

Requester requests that records be delivered via email to [REDACTED]. If the volume of responsive records is too large for email transmission, please provide them via a secure file-sharing service.

Please search for responsive records regardless of format, medium, or physical characteristics, and including electronic records. Please provide the requested documents in the following format:

- In PDF format wherever possible;
- Bates numbered in sequence for each agency;
- Without password protection;
- Electronically searchable wherever possible;
- “Parent-child” relationships maintained, meaning that the Requester must be able to identify the attachments with emails;
- Any data records in native format (i.e. Excel spreadsheets in Excel);
- Emails should include BCC and any other hidden fields; and
- With any other metadata preserved.

Conclusion

If this Request is denied in whole or in part, Requester asks that the Agency justify all its deletions by reference to specific exemptions of FOIA. Requester expects the Agency to release all segregable portions of otherwise exempt material. Additionally, Requester reserves the right to appeal a decision to withhold any records or a decision to deny this application for expedited processing and fee waiver.

Thank you for your prompt attention to this request. We look forward to your response. If you require clarification or anticipate any delay, please contact us promptly at [REDACTED].

Sincerely,

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