

April 9, 2020

Federal Bureau of Investigation
Attn: FOI/PA Request
Record/Information Dissemination Section
170 Marcel Drive
Winchester, VA 22602-4843
Fax: (540) 868-4391/4997

Re: Freedom of Information Act Request

To Whom It May Concern:

On March 20, 2020, former Asst. U.S. Attorney Deborah Sines was deposed in *Ed Butowsky v. David Folkenflik, et al.*, Case No. 4:18-cv-00442-ALM (E.D.Tex.) about matters pertaining to Seth Conrad Rich (“Seth Rich”) and his brother, Aaron Nathan Rich (“Aaron Rich”). A copy of the deposition transcript can be found at <https://tinyurl.com/v7xvms7> or <http://lawflog.com/wp-content/uploads/2020/04/2020.03.20-Deborah-Sines-deposition-transcript.pdf>. Seth Rich was a Democratic National Committee employee who was murdered on or about July 10, 2016 in Washington, D.C.

According to Ms. Sines’s testimony, the FBI conducted an investigation into possible hacking attempts on Seth Rich’s electronic accounts following his murder. Ms. Sines also testified that the FBI examined Seth Rich’s laptop computer as part of its investigation, and that there should be emails between her and FBI personnel. Finally, she testified that she met with a prosecutor and an FBI agent assigned to Special Counsel Robert Mueller.

Ms. Sines’s testimony conflicts with the affidavit testimony of David M. Hardy, who claimed that the FBI conducted a reasonable search and could not find any records pertaining to Seth Rich. *See* October 3, 2018 Affidavit of David M. Hardy (<http://lawflog.com/wp-content/uploads/2020/01/Hardy-Declaration.pdf>) and July 29, 2019 Affidavit of David M. Hardy (<http://lawflog.com/wp-content/uploads/2020/01/Second-Hardy-Declaration.pdf>). Mr. Hardy’s affidavits were also contradicted by email records that Judicial Watch obtained in *Judicial Watch, Inc. v. U.S. Department of Justice*, Case No. 1:18-cv-00154-RBW (D.D.C.). *See* August 10, 2016 email string (<https://tinyurl.com/wylcu9l> or <http://lawflog.com/wp-content/uploads/2020/04/FBI-emails-re-Seth-Rich.pdf>). Clearly, the FBI is in possession of email records pertaining to Seth Rich.

As permitted by the Freedom of Information Act, 5 U.S.C. § 552, I request the opportunity to view the following:

1. All data, documents, records, or communications (electronic or otherwise) created or obtained since January 1, 2016 that discuss or reference Seth Rich or Aaron Rich. This would include, but is not limited to, all data, documents, records, or communications in the

Washington Field Office, Computer Analysis Response Team (“CART”), and any other “cyber” unit within the FBI.

2. All data, documents, records, or communications regarding any person or entity’s attempt to hack into Seth Rich’s electronic or internet accounts (*e.g.*, email) after his death.
3. All data downloaded from all electronic devices that belonged to Seth Rich as well as all data, documents, records or communications indicating how the devices were obtained and who was responsible for downloading the information.
4. All data, documents, communications, records or other evidence indicating whether Seth Rich, Aaron Rich, or any other person or persons were involved in transferring data from the Democratic National Committee to Wikileaks in 2016, either directly or through intermediaries. This request includes, but is not limited to, any reports from CrowdStrike, Inc. that were obtained by the FBI while assisting Special Counsel Robert Mueller’s investigation.
5. All documents, communications, records or other evidence reflecting orders or directions (whether formal or informal) for the handling of any evidence pertaining to Seth Rich's or Aaron Rich's involvement in transferring data from the Democratic National Committee to Wikileaks.
6. All documents, records, or communications exchanged with any other government agencies (or representatives of such agencies) since January 1, 2016 regarding (1) Seth Rich's murder or (2) Seth Rich's or Aaron Rich's involvement in transferring data from the Democratic National Committee to Wikileaks.
7. All recordings, transcripts, or notes (*e.g.*, FD-302 forms) reflecting any interviews of Aaron Rich, Deborah Sines or any other witness regarding (1) the death of Seth Rich, (2) the transfer of data from the Democratic National Committee to Wikileaks, or (3) any attempt to hack into electronic or internet accounts (*e.g.*, email) belonging to Seth Rich.
8. All data, documents, records or communications obtained or produced by the FBI's Computer Analysis and Response Team (“CART”) or any other FBI cyber unit regarding Seth Rich and/or Aaron Rich.
9. All data, documents, records or communications (including texts or emails) that reflect any meetings or communications from July 10, 2016 until July 10, 2017 between former FBI Deputy Director Andrew McCabe and any and all of the following: (1) Seymour Myron "Sy" Hersh (born on or about April 8, 1937); (2) Washington, D.C. Mayor Muriel Bowser; and/or (3) former Democratic National Committee Interim Chairwoman Donna Brazile.
10. If any of the items or things requested in this subpoena were discarded or destroyed, produce all data, documents, records or communications reflecting that fact.

If copying costs will be more than \$100, please let me know in advance. Thank you in advance for your assistance.

Sincerely,

A handwritten signature in cursive script that reads "Brian Huddleston".

Brian Huddleston

