

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

JUDICIAL WATCH, INC.,

Plaintiff,

v.

DEPARTMENT OF JUSTICE,

Defendant.

Civil Action No. 23-3004 (JEB)

**LOCAL RULE 7(h) STATEMENT OF MATERIAL FACTS  
AS TO WHICH THERE IS NO GENUINE DISPUTE**

1. On December 24, 2022, Plaintiff submitted a Freedom of Information Act request to the Federal Bureau of Investigation (“FBI”) seeking

- All records documenting any payments made to Twitter, Inc. and/or any employee thereof by the Federal Bureau of Investigation. This request includes, but is not limited to, all related purchase orders, expense requests and approvals, and similar records.
- All contracts or similar records documenting the purpose or basis of any payment described in part one of this request.

Decl. of Shannon Hammer Decl. ¶ 6.

2. The request was limited to records dated from January 1, 2016 to the present. Hammer Decl. ¶ 6.

3. Dissatisfied with the FBI’s response, Plaintiff filed suit on October 10, 2023. Compl. (ECF No. 1).

4. The FBI processed the request and on June 14, 2024, released forty-four pages to Plaintiff in part. Hammer Decl. ¶ 14.

5. In an effort to resolve disputes regarding the search, the FBI sent Plaintiff a draft search declaration on October 28, 2024, and Plaintiff agreed not to contest the scope of the search.

Jt. Status Rpt. ¶ 2 (ECF No. 12); Jt. Status Rpt. ¶ 2 (ECF No. 14).

6. The parties narrowed their disputes to the FBI's withholdings of the vendor names and dollar amounts. Jt. Status Rpt. ¶ 2 (ECF No. 14).

7. The FBI withheld the vendor names under Exemptions 3 and 7(E), and the dollar amounts under Exemption 7(E). Hammer Decl. ¶¶ 19-30.

8. The FBI released all non-exempt reasonably segregable portions of responsive records that would not cause foreseeable harm to the interests that the FOIA exemptions protect.

Dated: July 17, 2025

Respectfully submitted,

JEANINE FERRIS PIRRO  
United States Attorney

By:                   /s/ John J. Bardo                    
JOHN J. BARDO  
Assistant United States Attorney  
601 D Street, NW  
Washington, DC 20530  
(202) 870-6770

*Attorneys for the United States of America*