

# Exhibit 1



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*Affiliations appear only for purposes of identification.*

United States Department of Justice  
Civil Rights Division  
Washington, D.C.  
CRT.FOIArequests@usdoj.gov

March 20, 2026

VIA EMAIL

To Whom It May Concern:

This letter constitutes a request under the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”), and is submitted on behalf of the Reporters Committee for Freedom of the Press (“RCFP” or the “Reporters Committee”) to the Civil Rights Division of the United States Department of Justice.

The Reporters Committee is an unincorporated nonprofit association of reporters and editors dedicated to defending the First Amendment and newsgathering rights of the news media.

I. Definitions

Please note that as used herein:

- “EMAIL(S)” means and refers to electronic mail that was sent, received, copied on, or blind copied on, any attachments thereto, as well as the entirety of any email chain the email(s) are part of, whether such emails were sent or received sent on government systems or non-governmental systems;
- “ELECTRONIC MESSAGE(S)” means and refers to any electronic message other than emails, and includes (but is not limited to) information sent via SMS, iMessage, Signal, WhatsApp, Wickr, Confide, X, Truth Social, and any iOS or Android applications.

II. Requested Records

Pursuant to FOIA, I, on behalf of RCFP, request access to and copies of the following:

1. All EMAILS sent to or from Assistant Attorney General Harmeet Dhillon between January 17 and 31, 2026, that include “Georgia Fort” (case insensitive), “Georgia Ellyse Fort” (case insensitive), “Lemon” (case insensitive), “Schiltz” (case insensitive), or “Micko” (case insensitive);
2. All EMAILS sent to or from Assistant Attorney General Harmeet Dhillon between January 17 and February 26, 2026, that mention or refer to Shane Ryan Bollman (aka Junn Bollmann);
3. All ELECTRONIC MESSAGES on Assistant Attorney General’s Harmeet Dhillon’s mobile phone(s) that were sent or received on January 18, 2026, which include “Lemon” or “Fort.” This sub-part also seeks the 20 messages in the pertinent thread or conversation that precede the mention of “Lemon” or “Fort,” and the 20 messages in the pertinent thread or conversation that follow the mention of “Lemon” or “Fort”;
4. All EMAILS sent to or from Principal Deputy Assistant Attorney General Jesus Osete between January 17 and 31, 2026, that include “Georgia Fort” (case insensitive), “Georgia Ellyse Fort” (case insensitive), “Lemon” (case insensitive), “Schiltz” (case insensitive), or “Micko” (case insensitive);
5. All EMAILS sent to or from Principal Deputy Assistant Attorney General Jesus Osete between January 17 and February 26, 2026, that mention or refer to Shane Ryan Bollman (aka Junn Bollmann);
6. All EMAILS sent to or from Acting Deputy Assistant Attorney General Robert Keenan between January 17 and 31, 2026, that include “Georgia Fort” (case insensitive), “Georgia Ellyse Fort” (case insensitive), “Lemon” (case insensitive), “Schiltz” (case insensitive), or “Micko” (case insensitive);
7. All EMAILS sent to or from Acting Deputy Assistant Attorney General Robert Keenan between January 17 and February 26, 2026, that mention or refer to Shane Ryan Bollman (aka Junn Bollmann);

8. All applications for search warrants, along with the supporting affidavits, as to the cellphones of Don Lemon, Georgia Fort, and/or Shane Ryan Bollman (aka Junn Bollmann).

Please provide all responsive records in electronic format via email to [amarshall@rcfp.org](mailto:amarshall@rcfp.org)

### III. Fees

As a representative of the news media, the Reporters Committee is only required to pay for the direct cost of duplication after the first 100 pages. 5 U.S.C. § 552(a)(4)(A). These records are being sought on behalf of the Reporters Committee for analysis and free dissemination to the general public through multiple avenues, including RCFP's website,<sup>1</sup> social media accounts,<sup>2</sup> and email newsletters.<sup>3</sup> In the event there are fees for responding to this request, RCFP is willing to pay up to \$25.00. Please inform me if the fees will exceed that amount before proceeding.

### IV. Conclusion

If this request is denied in whole or in part, please justify all such denials by reference to specific exemptions and provide an explanation of why the Civil Rights Division “reasonably foresees that disclosure would harm an interest” protected by that exemption or why “disclosure is prohibited by law[.]” 5 U.S.C. §552(a)(8). Please also ensure all segregable portions of otherwise exempt material are released.

If you have any questions regarding this request, please do not hesitate to contact me via email at [amarshall@rcfp.org](mailto:amarshall@rcfp.org).

I look forward to your determination within 20 working days, as is required by FOIA. Thank you in advance for your assistance in this matter.

Sincerely,  
Adam A. Marshall  
Reporters Committee for  
Freedom of the Press  
[amarshall@rcfp.org](mailto:amarshall@rcfp.org)

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<sup>1</sup> <https://www.rcfp.org/>.

<sup>2</sup> <https://bsky.app/profile/rcfp.org> (8.9k followers as of Mar. 20, 2026); <https://www.facebook.com/ReportersCommittee> (10k followers as of Mar. 20, 2026); <https://x.com/rcfp> (24.8k followers as of Mar. 20, 2026).

<sup>3</sup> <https://www.rcfp.org/subscribe/>.