

# Exhibit 5



PO Box 34176  
Washington, DC 20043  
(202) 795-9300 • www.rcfp.org

**PRESIDENT**  
Bruce D. Brown

**STEERING COMMITTEE CHAIR**  
STEPHEN J. ADLER

**VICE CHAIR**  
MARGARET LOW  
WBUR

**SECRETARY-TREASURER**  
MASSIMO CALABRESI  
The New York Times

**EXECUTIVE COMMITTEE MEMBERS**

DAVID BOARDMAN  
Temple University  
THEODORE J. BOUTROUS, JR.  
Gibson, Dunn & Crutcher LLP

GAIL GOVE  
NBCUniversal

LAURA HANDMAN  
Davis Wright Tremaine  
DIEGO IBARGÜEN  
Hearst

THOMAS C. RUBIN  
OpenAI

**STEERING COMMITTEE MEMBERS**

MARTY BARON  
Ret., The Washington Post  
WOLF BLITZER  
CNN

SEWELL CHAN  
USC Annenberg

LYNETTE CLEMETSON  
University of Michigan

JASON CONTI  
Dow Jones

NIKHIL DEOGUN  
Brunswick Group

MANNY GARCIA  
Florida International University  
EMILIO GARCIA-RUIZ  
The San Francisco Chronicle

JOSH GERSTEIN  
POLITICO

ALEX GIBNEY  
Jigsaw Productions

JAMES GRIMALDI  
National Catholic Reporter

KAREN KAISER  
The Associated Press

KIMBRIELL KELLY  
Chicago Public Media

ALEX MACCALLUM  
CNN

MATT MURRAY  
The Washington Post

NORMAN PEARLSTINE  
New York, New York

CHARLIE SAVAGE  
The New York Times

ADAM SYMSON  
The E.W. Scripps Company

MATT THOMPSON  
The New York Times

VICKIE WALTON-JAMES  
NPR

*Affiliations appear only for purposes of identification.*

U.S. Immigration and Customs Enforcement  
Washington, D.C.

March 20, 2026

VIA FOIA.GOV PORTAL

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 U.S. Immigration and Customs Enforcement (“ICE”).

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;
- “GERBER” means and refers to Homeland Security Investigations Special Agent Timothy M. Gerber.

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 GERBER 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 GERBER between January 17 and February 26, 2026, that mention or refer to Shane Ryan Bollman (aka Junn Bollmann);
3. All ELECTRONIC MESSAGES on GERBER’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, ELECTRONIC MESSAGES, and any other records consisting of or reflecting communications between GERBER and any magistrate judge or district court judge of the United States District Court for Minnesota, that were sent or received between January 17 and January 23, 2026;
5. Records consisting of or documenting any appointment of GERBER or other agents within Homeland Security Division to investigate the events of January 18, 2026 at Cities Church in St. Paul, Minnesota;
6. All EMAILS, memoranda, and forms mentioning or referencing the arrest of Georgia Ellyse Fort by HSI on January 30, 2026;
7. All EMAILS, memoranda, and forms mentioning or referencing the arrest of Don Renaldo Lemon by HSI on January 30, 2026;
8. All EMAILS, memoranda, and forms mentioning or referencing the arrest of Shane Ryan Bollman (aka Junn Bollmann) by HSI on February 27, 2026; and
9. All applications for search warrants, along with the supporting affidavits, as to the cellphones, computers, and/or other electronic

devices of Don Lemon, Georgia Fort, and 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)

---

<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/>.