



**U.S. Department of Justice**

Office of the Solicitor General

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*Executive Officer*

*Washington, D.C. 20532*

**VIA U.S. MAIL or VIA EMAIL to <[foia@americanoversight.org](mailto:foia@americanoversight.org)>**

Mehreen Rasheed  
1030 15<sup>th</sup> Street, NW  
Suite B255  
Washington, DC 20005

Re: OSG FOIA No. **2022-127817**

Dear Ms. Rasheed:

This letter responds to your Freedom of Information Act (FOIA) Request to the Office of the Solicitor General (OSG) on February 2, 2022, in which you requested:

- “All email communications (including emails, email attachments, complete email chains, calendar invitations, and calendar invitation attachments) and text messages or messages on messaging platforms (such as Slack, GChat or Google Hangouts, Lync, Skype, Twitter direct messages, Facebook messages, WhatsApp, Signal, Telegram, or Parler) between (a) Deputy Solicitor General Curtis Gannon both or anyone communicating on Gannon’s behalf, such as a Chief of Staff, scheduler, or assistant, and (b) any of the external parties listed below:
- External Parties
  1. Any person communicating on behalf of Heritage Action, including but not limited to Jessica Anderson, Garrett Bess, or any person communicating from an email address ending in [@heritageaction.com](mailto:@heritageaction.com).
  2. Any person communicating on behalf of the Heritage Foundation, including but not limited to Ed Meese, Bridgett Wagner, Hans von Spakovsky, or any person communicating from an email address ending in [@heritage.org](mailto:@heritage.org).
  3. Kris Kobach (including, but not limited to, communications with the email [kkobach@gmail.com](mailto:kkobach@gmail.com) or [kris@kriskobach.com](mailto:kris@kriskobach.com)).
  4. Anyone communicating on behalf of the Public Interest Legal Foundation or the Election Law Center, including but not limited to J. (John) Christian Adams, Maureen Riordan, or any person

communicating from an email address ending in @publicinterestlegal.org or @electionlawcenter.com - 2 - DOJ-OSG-22-0122.

5. Anyone communicating on behalf of FreedomWorks, including but not limited to Cleta Mitchell, or any person communicating from an email address ending in @freedomworks.org or @foley.com.

6. Anyone communicating on behalf of True the Vote, including but not limited to Catherine Engelbrecht, Courtney Kramer, or any person communicating from an email address ending in @truethevote.org.

7. Anyone communicating on behalf of Susan B. Anthony List, American Principles Project, or the Election Transparency Initiative, including but not limited to Ken Cuccinelli, or any person communicating from an email address ending in @sba-list.org, @americanprinciplesproject.org, or @electiontransparency.org.

8. Anyone communicating on behalf of the Federalist Society or the Honest Elections Project including but not limited to Leonard Leo, Jason Snead, or any person communicating from an email address ending in @honestelections.org, @fed-soc.org, or @jasonsnead.com.

9. Anyone communicating on behalf of the State Policy Network, including but not limited to Tracie Sharp, Kathleen O’Hearn, or any person communicating from an email address ending in @spn.org.

10. Anyone communicating on behalf of the American Greatness Fund or the Thomas Moore Society, including but not limited to Jenna Ellis, or any person communicating from an email address ending in @americangreatnessfund.com or @thomasmoresociety.org.

11. Phill Kline (phillklineva@gmail.com), Luis Cornelio (lcorne1001@citymail.cuny.edu), or anyone communicating on behalf of the Amistad Project or the American Voter’s Alliance (@got-freedom.org).

12. Anyone communicating on behalf of ALEC, including but not limited to Michael Bowman, Bill Meierling, or any person communicating from an email address ending in @alec.org.

13. James Bopp, or any person communicating from an email address ending in @bopplaw.com.

14. Will Consovoy, Michael Connally, or any person communicating from an email address ending in [@consovoymccarthy.com](mailto:@consovoymccarthy.com).
15. Jason Torchinsky or any person communicating from an email address ending in [@hvjt.law](mailto:@hvjt.law).
16. Stefan Passantino, Justin Clark, or any person communicating from an email address ending in [@michaelbest.com](mailto:@michaelbest.com).
17. Sidney Powell, and anyone communicating on behalf of Sidney Powell, P.C., including anyone communicating from an email address ending in [@federalappeals.com](mailto:@federalappeals.com).
18. Mike Lindell or anyone communicating n an email address ending in [@mypillow.com](mailto:@mypillow.com).
19. Kurt Olsen ([kurtols@protonmail.com](mailto:kurtols@protonmail.com)).
20. William Olson ([williamolson@lawandfreedom.com](mailto:williamolson@lawandfreedom.com) [wjo@mindspring.com](mailto:wjo@mindspring.com)).
21. Patrick Byrne (including, but not limited to [patrick@deepcapture.com](mailto:patrick@deepcapture.com)), or anyone communicating on behalf of the America Project, including anyone communicating from an email address ending in [@americaproject.com](mailto:@americaproject.com).
22. Colonel Phil Waldron ([phil@onewarrior.com](mailto:phil@onewarrior.com), [JWRLLC@gmail.com](mailto:JWRLLC@gmail.com), or [p@bonfiresearch.org](mailto:p@bonfiresearch.org)), Russell Ramsland ([ryuks9sq@alliedspecialops.us](mailto:ryuks9sq@alliedspecialops.us) or - 3 - DOJ- OSG-22-0122 [yrku9sqs@protonmail.com](mailto:yrku9sqs@protonmail.com)), James Keet Lewis III ([keet@jkeetlewis.com](mailto:keet@jkeetlewis.com)), or anyone communicating on behalf of Allied Security Operations Group ([@alliedspecialops.us](mailto:@alliedspecialops.us)).
23. John Eastman (including but not limited to, from the email address [jeastman@claremont.org](mailto:jeastman@claremont.org) or [jeastman@chapman.edu](mailto:jeastman@chapman.edu)), or anyone communicating on behalf of Constitutional Counsel Group ([@ccg1776.com](mailto:@ccg1776.com)).
24. Anyone communicating on behalf of the America First Policy Institute, including Brooke Rollins, Chad Wolf, or anyone communicating from an email address ending in [@americafirstpolicy.com](mailto:@americafirstpolicy.com).

25. Anyone communicating on behalf of America First Legal, including Stephen Miller, Gene Hamilton, Russ Vought, or anyone communicating from an email address ending in @legal.org.”

This Office reviewed its records and identified five (5) pages of email communications that were responsive to your request. This office is releasing all five (5) pages to you at no cost with minimal redactions pursuant to 5 U.S.C. § 552(b)(6) which protects privacy rights and excludes from release personal, private or identifiable information from disclosure.

Please be advised that we have considered the foreseeable harm standard when reviewing records and applying FOIA exemptions.

If you wish to discuss any aspect of your request, you may contact our FOIA Coordinator at [osgfoia@usdoj.gov](mailto:osgfoia@usdoj.gov) or at 202-514-2203, using the assigned FOIA tracking number. You may also write to OSG at:

OSG FOIA Public Liaison  
Office of the Solicitor General  
950 Pennsylvania Avenue, N.W.  
Washington, DC 20530-0009

Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows:

Office of Government Information Services  
National Archives and Records Administration  
8601 Adelphi Road-OGIS  
College Park, Maryland 20740-6001

Email: [ogis@nara.gov](mailto:ogis@nara.gov)  
Telephone: 202-741-5770; toll free at 1-877-684-6448  
Facsimile: 202-741-5769

If you are not satisfied with the response to this request, you may administratively appeal by writing to the Director, Office of Information Policy (OIP), United States Department of Justice, Suite 11050, 1425 New York Avenue, NW, Washington, DC 20530-0001, or you may submit an appeal through OIP’s FOIA online portal by creating an account on the following web site:

<https://www.foiaonline.gov/foiaonline/action/public/home>. Your appeal must be postmarked or electronically transmitted within 90 days of the date of my response to your request. If you submit your appeal by mail, both the letter and the envelope should be clearly marked “Freedom of Information Act Appeal.”

Sincerely,

VALERIE  
YANCEY

Digitally signed by  
VALERIE YANCEY  
Date: 2023.08.24  
10:07:50 -04'00'

Valerie Yancey

Enclosure:

Email communications (5 pages)

VY/nd

From: Taylor Meehan  
<(b) (6)>  
To: Reaves, Nicole (OSG)  
<(b) (6)> Gannon, Curtis  
E. (OSG)  
<(b) (6)>  
Cc:  
Bcc:  
Subject: [EXTERNAL] Re: Kinney v. HSBC Bank USA, No. 21-599  
Date: Thu Apr 07 2022 16:14:21 EDT  
Attachments:

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Terrific, thanks to you both!

I will stay tuned for proposed dates and details and will look forward to seeing you all then.

Have a great rest of your Thursday,

Taylor

Taylor Meehan

Consovoy McCarthy PLLC

(b) (6) (cell)

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This message may contain confidential and privileged information. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

From: "Reaves, Nicole (OSG)" <(b) (6)>  
Date: Thursday, April 7, 2022 at 2:52 PM  
To: "Gannon, Curtis E. (OSG)" <(b) (6)> Taylor Meehan  
<(b) (6)>  
Subject: RE: Kinney v. HSBC Bank USA, No. 21-599

Taylor,

I hope you're doing well, and congratulations on the new(ish) job. I'll be in touch soon with proposed dates and details.

All the best,  
Nicole

Nicole Frazer Reaves  
Assistant to the Solicitor General  
U.S. Department of Justice  
(b) (6) (office) / (b) (6) (cell)

From: Gannon, Curtis E. (OSG) <(b) (6)>  
Sent: Thursday, April 7, 2022 3:49 PM  
To: Taylor Meehan <(b) (6)>  
Cc: Reaves, Nicole (OSG) <(b) (6)>  
Subject: RE: Kinney v. HSBC Bank USA, No. 21-599

Taylor,

Belated thanks for getting in touch with us. We will, of course, be eager to meet with you about the case. At this point, I think we'll shoot for a time after the Court's April argument session.

I'm copying Nicole Reaves, who will be the Assistant on the case in the SG's office.

Curtis

From: Joshi, Sopan (OSG) <(b) (6)> mailto:(b) (6)  
Sent: Monday, March 14, 2022 2:26 PM  
To: Taylor Meehan <(b) (6)> mailto:(b) (6)  
Cc: Gannon, Curtis E. (OSG) <(b) (6)> mailto:(b) (6)  
Subject: RE: Kinney v. HSBC Bank USA, No. 21-599

Hi Taylor, thanks for reaching out. Forwarding to Curtis, who is the deputy handling the case. Thanks!  
Sopan

From: Taylor Meehan <(b) (6)> (b) (6)  
Sent: Monday, March 14, 2022 9:51 AM  
To: Joshi, Sopan (OSG) <(b) (6)> mailto:(b) (6)  
Subject: [EXTERNAL] Kinney v. HSBC Bank USA, No. 21-599

Hi Sopan,

I'm writing regarding Kinney v. HSBC Bank USA, No. 21-599, which the Court CVSG'd on the March 7 orders list.

I wanted to pass along that I'll be joining as counsel for petitioner. We'd really appreciate a meeting to discuss the case and can be available at the convenience of the office.

Let me know if I ought to direct to someone else.

Many thanks!

Taylor

Taylor Meehan  
Consovoy McCarthy PLLC  
(b) (6) (cell)

<https://protect2.fireeye.com/v1/url?k=d042cab6-8fd9f24a-d045ee53-ac1f6b01771c-bcdc89f1a7d920e6&q=1&e=11f037f9-61e0-41f3-b087-a0d18a48d627&u=http%3A%2F%2Fwww.consovoymccarthy.com%2F%3Chttps://protect2.fireeye.com/v1/url?k=b1bd37e6-ee260f34-b1ba1303-0cc47adc5fdc-d568d3feb15c3a5c&q=1&e=d44b29df-c7ec-4ebd-a5f2-72b30aab3ead&u=http%3A%2F%2Fwww.consovoymccarthy.com%2F%3E>

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From: Taylor Meehan  
<(b) (6)>  
To: Fleming, Mark  
<(b) (6)> Gannon, Curtis E. (OSG)  
<(b) (6)> Ellis, Jonathan (OSG)  
<(b) (6)>  
Cc: Ira Kurzban <(b) (6)>  
Sprankling, Thomas <(b) (6)>  
Bcc:  
Subject: Re: Patel v. Garland -- joint appendix  
Date: Fri Jul 09 2021 10:33:31 EDT  
Attachments:

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Dear Mark,

No objections here.

Relatedly, in looking at the electronically filed petition appendix, it appears that pages 78a, 120a, 121a didn't scan correctly.

Warmest regards,  
Taylor

Taylor Meehan  
Consovoy McCarthy PLLC  
(b) (6) (cell)  
(b) (6) (office)

<https://protect2.fireeye.com/v1/url?k=b32f27ad-ecb41ee1-b3280348-0cc47adca7cc-a0725beecd729681&q=1&e=adec8bdb-a0a0-4121-a6ba-39b61c7f5909&u=http%3A%2F%2Fwww.consovoy.com%2F<https://protect2.fireeye.com/v1/url?k=fbd935ee-a4420ca2-fbde110b-0cc47adca7cc-70a15d3436888c44&q=1&e=adec8bdb-a0a0-4121-a6ba-39b61c7f5909&u=http%3A%2F%2Fwww.consovoy.com%2F>>

This message may contain confidential and privileged information. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

From: "Fleming, Mark" <(b) (6)>  
Date: Thursday, July 8, 2021 at 10:08 AM  
To: "Taylor (b) (6)" <(b) (6)> "Gannon, Curtis E. (OSG)" <(b) (6)>  
(b) (6) "Ellis, Jonathan (OSG)" <(b) (6)>  
Cc: Ira Kurzban <(b) (6)> "Sprankling, Thomas" <(b) (6)>  
Subject: Patel v. Garland -- joint appendix

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Dear Taylor, Jonathan, and Curtis,

Pursuant to Supreme Court Rule 26.8, Petitioners intend to move to dispense with the printing of a Joint Appendix in this matter, because the petition appendix already reproduces the necessary materials (except for the docket entries, which we do not think would materially assist the Court's consideration of the case). Could you please let us know whether you will consent to the motion?

Best regards,  
Mark

Mark C. Fleming (he/him/his) | WilmerHale  
60 State Street  
Boston, MA 02109 USA

(b) (6) (t)

(b) (6) (f)

(b) (6)

Please consider the environment before printing this email.

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This email message and any attachments are being sent by Wilmer Cutler Pickering Hale and Dorr LLP, are confidential, and may be privileged. If you are not the intended recipient, please notify us immediately—by replying to this message or by sending an email to (b) (6) mailto:(b) (6) and destroy all copies of this message and any attachments. Thank you.

For more information about WilmerHale, please visit us at <https://protect2.fireeye.com/v1/url?k=6677eab7-39ecd3fb-6670ce52-0cc47adca7cc-044ec1539f5ceace&q=1&e=adec8bdb-a0a0-4121-a6ba-39b61c7f5909&u=http%3A%2F%2Fwww.wilmerhale.com%2F>.