



**Homeland
Security**

August 31, 2026

SENT VIA E-MAIL TO: bklubes@klubeslaw.com

Benjamin B. Klubes
Klubes Law Group
1717 K Street NW, Suite 900
Washington, DC 20006

Re: DNC v DOJ DHS (26-cv-00825) (2026-HQLI-00028)

Dear Benjamin B. Klubes:

This is an interim response to your Freedom of Information Act (FOIA) request to the Department of Homeland Security (DHS) Privacy Office, dated October 17, 2025.

For this production, DHS processed 1,065 pages of documentation, of which 51 pages are responsive, 475 pages are non-responsive, and 539 pages are duplicates. Of the 51 responsive pages 46 pages are released in full, 4 pages are withheld in full, and 1 page is withheld in part pursuant to FOIA exemption (b)(5). Please be advised that we have considered the foreseeable harm standard when reviewing records and applying FOIA exemptions.

FOIA Exemption 5 protects from disclosure those inter- or intra-agency documents that are normally privileged in the civil discovery context. The three most frequently invoked privileges are the deliberative process privilege, the attorney work-product privilege, and the attorney-client privilege. After carefully reviewing the responsive documents, I&A is withholding this information that if released, would reveal information protected by one of the following privileges:

- **Deliberative Process Privilege**

The deliberative process privilege protects the integrity of the deliberative or decision-making processes within the agency by exempting from mandatory disclosure opinions, conclusions, and recommendations included within inter-agency or intra-agency memoranda or letters. The release of this internal information would discourage the expression of candid opinions and inhibit the free and frank exchange of information among agency personnel.

The 51 pages provided are numbered DHS-001-00825-000105 through DHS-001-00825-000155.

If you have any questions regarding this release, please contact Assistant U.S. Attorney, Andrew Vaden, Assistant United States Attorney, U.S. Attorney's Office, District of Columbia, by email at andrew.vaden@usdoj.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Meekia Windham", with a stylized flourish at the end.

Meekia Windham
Acting Senior Director, FOIA Litigation, Appeals,
Policy and Training

Enclosure: 51 pages