



March 10, 2025

By Email

United States Department of Homeland Security
Office of Intelligence and Analysis
1500 Pennsylvania Avenue, NW
Washington, D.C. 20220
foia@hq.dhs.gov

Dear FOIA Officer,

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, I respectfully seek records related to the efforts of the Department of Homeland Security (“DHS”) Office of Intelligence and Analysis (“I&A Office”) through the Domestic Security Alliance Council and other means to collect Americans’ personal financial information from private financial institutions and encourage private financial institutions to monitor Americans’ financial activity. Accordingly, I request:

1. All documents transmitted or communicated by DHS through the Domestic Security Alliance Council Portal containing any of the following terms, phrases, or acronyms:
 - a. “domestic violent extrem!”
 - b. “DVE”
 - c. “domestic terror!”
 - d. “DT”
2. Documents sufficient to identify any entity that has ever been a member of the Domestic Security Alliance Council.
3. All communications between any DHS I&A Office personnel and any personnel of a financial institution containing any of the following terms, phrases, or acronyms:
 - a. “threshold”
 - b. “search term”
 - c. “merchant category code”
 - d. “MCC”
 - e. “parameter”
 - f. “query”
 - g. “Jan! 6”

- h. "Jan! six"
- i. "1/6!"
- j. "1.6!"
- k. "J6"
- l. "capitol riot"
- m. "capitol attack"

Please limit all searches in response to this request from January 1, 2019, through January 1, 2025. Please limit all searches to the DHS I&A Office. Please conduct all searches in a manner that is case-insensitive. That is, records should be retrieved regardless of whether the search terms appear in uppercase, lowercase, or a combination of both. "!" denotes a root expander for the purposes of this request. Even if a search term does not contain the "!" root expander, please include variations of the search terms that contain additional letters at the end, such as plural forms or common suffix variations.

The term "document" means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including, but not limited to, the following: memorandums, reports, manuals, financial reports, records, letters, emails, MMS or SMS text messages, contracts, transcripts, messages, and investigations. By definition, a "communication," as that term is defined herein, is also a "document" if the means of communication is any written, recorded, or graphic matter of any sort whatsoever, regardless of how recorded.

The term "communication" means any transmitted information in any format or medium, whether oral, electronic, by document, or otherwise, including, but not limited to the following: telephone, facsimile, email, text message, MMS or SMS message, WhatsApp, Signal, regular mail, or social media direct message. "Communications between" means any communication involving the related parties, regardless of whether other persons were involved in the communication, and includes, but is not limited to, communications where one party is cc'd or bcc'd, both parties are cc'd or bcc'd, or some combination thereof.

This request for records includes any attachments to those records or other materials enclosed with those records when they were previously transmitted. To the extent an email is responsive to any request, that request also includes all prior messages sent or received in that email chain, as well as any attachments to the email.

In the interest of expediency and to minimize the research and/or duplication burden on your staff, please send records electronically if possible. If this is not

possible, please notify me before sending to the mailing address listed below. If access to this request will take longer than twenty business days, please let me know when I might receive records or be able to inspect the requested records.

If any portion of this request is denied for any reason, please provide written notice of the records or portions of records that are being withheld and cite each specific exemption to the Freedom of Information Act on which the agency relies. Moreover, to the extent that responsive records may be withheld in part, please produce all reasonably segregable portions of those records. Additionally, please provide all responsive documents even if they are redacted in full.

Fee Waiver Request

I request a waiver of all applicable fees associated with this request under 5 U.S.C. § 552(a)(4)(A)(iii). This request is solely for non-commercial purposes. As a 501(c)(3) nonprofit, Alliance Defending Freedom (“ADF”) does not have a commercial purpose, and the release of information requested is not in ADF’s commercial interest. ADF’s mission is to protect religious freedom, free speech, marriage and family, parental rights, and the sanctity of life through pro bono legal advocacy.

The disclosure of the requested information is in the public interest and is likely to contribute significantly to public understanding of government operations and activities. Specifically, disclosure is in the public interest because the requested information relates to the government’s warrantless surveillance of Americans’ private financial information, which has been covered extensively in national media. A report from a committee in the House of Representatives has also drawn attention to these issues.¹ ADF plans to use the requested information for analysis, evaluation, and public education, and it plans to disclose such information through social media, broadcast media, press releases, and other media.

If you deny this request for a fee waiver, please advise me in advance of the estimated charges if they are to exceed \$100. Please send me a detailed and itemized explanation of those charges.

¹ Committee on the Judiciary and the Select Subcommittee on the Weaponization of the Federal Government, *Financial Surveillance in the United States: How Federal Law Enforcement Commandeered Financial Institutions to Spy on Americans* (2024), <https://bit.ly/3Q5MAC9>.

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If you have any questions or need clarification of this request, please contact me at mmartin@adflegal.org.

Respectfully Submitted,

s/Mercer Martin
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Alliance Defending Freedom
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Scottsdale, AZ 85260