



February 10, 2023

Federal Bureau of Investigation  
Record/Information Dissemination Section  
200 Constitution Drive  
Winchester, VA 22602  
Fax: (540) 868-4391/4997

**RE: FOIA request for records about FBI's memo regarding "radical traditionalist Catholic ideology" and possible ties to "the far-right white nationalist movement" and related records**

Dear Sir or Ma'am:

This letter is a request ("Request") in accordance with the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, and the corresponding department/agency implementing regulations.

The Request is made by the American Center for Law and Justice ("ACLJ")<sup>1</sup> on behalf of its members. The ACLJ respectfully seeks expedited processing and a waiver of fees related to this Request as set forth in an accompanying memorandum.

To summarize, this Request seeks records pertaining to the shocking revelation of the Federal Bureau of Investigation's (FBI) Richmond field office's memo describing "radical traditionalist Catholic (RTC) ideology" and assessing "a growing overlap between the far-right white nationalist movement and RTCs," identifying these Catholics' as "anti-Semitic," and warning that their language, symbols and places of worship, as well as "hostility to abortion-rights advocates," are apparent indicators of possible threat, and basing certain conclusions on Southern Poverty Law Center's hate group list.

### **Background**

Pursuant to DOJ FOIA regulation 28 C.F.R. §16.3(b), this Background addresses "the date, title or name, author, recipient, subject matter of the record[s]" requested, to the extent known.

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<sup>1</sup>The ACLJ is a not-for-profit 501(c)(3) organization dedicated to the defense of constitutional liberties secured by law. The ACLJ regularly monitors governmental activity and works to inform the public of such affairs. The ACLJ and its global affiliated organizations are committed to ensuring governmental accountability and the ongoing viability of freedom and liberty in the United States and around the world.



According to shocking media reports:

The FBI has come under scrutiny after a leaked document showed the bureau warning that "radical traditionalist" Catholics pose as an extremist threat.

Kyle Seraphin, a former FBI special agent and federal whistleblower, obtained the document from the bureau's field office in Richmond, Virginia, and published it on the UncoveredDC website.<sup>2</sup>

As Newsweek reports:

The FBI has since confirmed to several news sites that it has removed the document from its systems because it does not meet the "exacting standards of the FBI."

"While our standard practice is to not comment on specific intelligence products, this particular field office product—disseminated only within the FBI—regarding racially or ethnically motivated violent extremism does not meet the exacting standards of the FBI," the statement read.

"Upon learning of the document, FBI Headquarters quickly began taking action to remove the document from FBI systems and conduct a review of the basis for the document," the statement added."<sup>3</sup>

Multiple media outlets are covering this story.<sup>4</sup> Of course, the FBI only announced this action after pushback resulting from media coverage, inquiries, and the whistleblower's revelation.

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<sup>2</sup> Ewan Palmer, *FBI Under Pressure for Targeting Catholics in Leaked Document*, NEWSWEEK (Feb. 10, 2023, 7:46 AM), <https://www.newsweek.com/fbi-memo-catholics-radical-traditional-leaked-1780379>.

<sup>3</sup> *Id.*

<sup>4</sup> E.g., Alexander Hall, *Purported FBI document suggests agency may be targeting Catholics who attend Latin Mass*, FOX NEWS (Feb. 9, 2023, 11:30 AM), <https://www.foxnews.com/media/purported-fbi-document-suggests-agency-targeting-catholics-attend-latin-mass>; Kyle Seraphin, *The FBI Doubles Down on Christians and White Supremacy in 2023*, UNCOVERDC (Feb. 8, 2023), <https://www.uncoverdc.com/2023/02/08/the-fbi-doubles-down-on-christians-and-white-supremacy-in-2023/>; Tyler Arnold, Joe Bukuras, *FBI retracts leaked document orchestrating investigation of Catholics*, CATHOLIC NEWS AGENCY (Feb. 9, 2023, 15:15 PM), <https://www.catholicnewsagency.com/news/253600/fbi-retracts-leaked-document-orchestrating-investigation-of-catholics>; John Solomon, *FBI suffers fresh bias episode, retracts intel memo portraying Catholics as extremist threats*, JUST THE NEWS (Feb. 9, 2023, 5:02 PM), <https://justthenews.com/accountability/fbi-suffers-fresh-bias-episode-retracts-intel-memo-portraying-catholics-extremist>; Brittany Bernstein, *FBI Internal Memo Warns against 'Radical Traditionalist Catholic Ideology'*, YAHOO NEWS (Feb. 8, 2023, 5:14 PM), <https://news.yahoo.com/fbi-internal-memo-warns-against-221426557.html>; Michael Katz, *FBI Retracts Internal Memo Targeting Traditional Catholic Ideology*, NEWSMAX (FEB. 9, 2023, 5:49 PM), <https://www.newsmax.com/us/fbi-memo-leaked/2023/02/09/id/1108064/>; Tyler O'Neil, *BREAKING: FBI Rescinds Memo Citing Southern Poverty Law Center After Daily Signal Report*, THE DAILY SIGNAL (Feb. 9, 2023), <https://www.dailysignal.com/2023/02/09/breaking-fbi-rescinds-radical-traditionalist-catholic-ideology-document-citing-southern-poverty-law-center/>; Brittany Bernstein, *FBI Internal Memo Warns against 'Radical Traditionalist Catholic Ideology'*, NATIONAL REVIEW (Feb. 8, 2023 5:14 PM), <https://www.nationalreview.com/news/fbi-internal-memo-warns-against-radical-traditionalist-catholic-ideology/>; Teri Christoph, *FBI Declares War on Traditional Catholics in Insidious New Intelligence Report*, REDSTATE (Feb. 8, 2023, 6:15 PM), <https://redstate.com/terichristoph/2023/02/08/fbi-declares-war-on-traditional-catholics-in-insidious-new-intelligence-report-n700678>.

## Records Requested

For purposes of this Request, the term “record” is “any information” that qualifies under 5 U.S.C. § 552(f), and includes, but is not limited to, the original or any full, complete and unedited copy of any log, chart, list, memorandum, note, correspondence, writing of any kind, policy, procedure, guideline, agenda, handout, report, transcript, set of minutes or notes, video, photo, audio recordings, or other material. The term “record” also includes, but is not limited to, all relevant information created, stored, received or delivered in any electronic or digital format, e.g., electronic mail, instant messaging or Facebook Messenger, iMessage, text messages or any other means of communication, and any information generated, sent, received, reviewed, stored or located on a government *or private* account or server, consistent with the holdings of *Competitive Enterprise Institute v. Office of Science and Technology Policy*, 827 F.3d 145, 150 (D.C. Cir. 2016) (rejecting agency argument that emails on private email account were not under agency control, and holding, “If a department head can deprive the citizens of their right to know what his department is up to by the simple expedient of maintaining his departmental emails on an account in another domain, that purpose is hardly served.”).

For purposes of this Request, the term “briefing” includes, but is not limited to, any meeting, teleconference, electronic communication, or other means of gathering or communicating by which information was conveyed to one or more person(s). For purposes of this Request, all sources, documents, letters, reports, briefings, articles and press releases cited in this Request are incorporated by reference as if fully set forth herein.

**For purposes of this Request, and unless otherwise indicated, the timeframe of records requested herein is January 1, 2022, through date of processing.**

Pursuant to FOIA, 5 U.S.C. § 552, ACLJ hereby requests that the FBI respond to the following numbered requests and produce all responsive records:

1. All records of communications between or including the FBI’s Director, Deputy Director, Chief of Staff, General Counsel, or any of their senior staff or assistants, or of any other FBI official of a GS-13 or appointee level or higher personnel (including forwarded email messages or CC or BCC email messages), about the memo described in the “Background” section above.
2. All records of communications between or including the FBI’s Director, Deputy Director, Chief of Staff, General Counsel, or any of their senior staff or assistants, or of any other FBI official of a GS-13 or appointee level or higher personnel (including forwarded email messages or CC or BCC email messages), about pro-life people **OR** Catholicism (including adherents of Catholicism) **OR** Christianity (including adherents of Christianity) – all in the context of analysis, threat assessment, domestic terrorism, or the monitoring of such people.
3. All records of briefings or communications between or including the FBI’s Director, Deputy Director, Chief of Staff, General Counsel, or any of their senior staff or assistants, or of any other FBI official of a GS-13 or appointee level or higher personnel

(including forwarded email messages or CC or BCC email messages), that mention the Supreme Court's decision in the case of *Dobbs v. Jackson Women's Health Organization*, No. 19-1392, 597 U.S. \_\_ (2022).

4. All records of communications between or including the FBI Richmond field office personnel, including analysts, senior staff or assistants, or of any other FBI official of a GS-13 or appointee level or higher (including forwarded email messages or CC or BCC email messages), about the memo described in the "Background" section above.
5. All records of communications between or including the FBI Richmond field office personnel, including analysts, senior staff or assistants, or of any other FBI official of a GS-13 or appointee level or higher (including forwarded email messages or CC or BCC email messages), about pro-life people **OR** Catholicism (including adherents of Catholicism) **OR** Christianity (including adherents of Christianity) – in the context of analysis, threat assessment, domestic terrorism, or the monitoring of such people.
6. All records of communications between or including the FBI Richmond field office personnel, including analysts, senior staff or assistants, or of any other FBI official of a GS-13 or appointee level or higher (including forwarded email messages or CC or BCC email messages), that mention the Supreme Court's decision in the case of *Dobbs v. Jackson Women's Health Organization*, No. 19-1392, 597 U.S. \_\_ (2022).
7. All records of or about FBI briefings, training or directives about or including mention of the First Amendment **OR** religious liberty or freedom or any other document reflecting the "exacting standards" mentioned in the FBI's responsive statement following described in the "Background" section above.

Search terms for these requests include, *but are not limited to*, the following: "abortion," "Dobbs," "pro-life," "prolife," "Christian," "Christianity," "Catholic," "Catholicism," "radical-traditionalist Catholic," "radical traditional Catholic," "RTC," and/or "Roman Catholic."

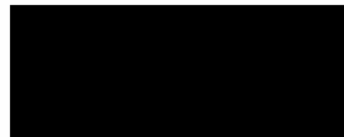
**PLEASE CONTACT THE UNDERSIGNED TO DISCUSS CLARIFICATION OR POTENTIAL NARROWING.**

#### **CONCLUSION**

If this Request is denied in whole or in part, ACLJ requests that, within the time requirements imposed by FOIA, you support all denials by reference to specific FOIA exemptions and provide any judicially required explanatory information, including but not limited to, a *Vaughn* Index.

Thank you for your prompt consideration of this Request. Please furnish all applicable records and direct any responses to:

Jordan Sekulow, Executive Director  
Benjamin P. Sisney, Senior Litigation Counsel  
John A. Monaghan, Senior Litigation Counsel  
American Center for Law and Justice





I affirm that the foregoing request and attached documentation are true and correct to the best of my knowledge and belief.

Respectfully submitted,

Jordan Sekulow  
Executive Director

Benjamin P. Sisney  
Senior Litigation Counsel

John A. Monaghan  
Senior Litigation Counsel