



August 24, 2026

VIA WEBSITE ONLY

Michael G. Seidel, Section Chief
Record/Information Dissemination Section
Records Management Division
Federal Bureau of Investigation
Department of Justice
200 Constitution Drive
Winchester, VA 22602
<https://efoia.fbi.gov>

RE: FBI investigation named “Oxferd Comma” and Related Records

Dear Mr. Seidel:

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”)¹ on behalf of its supporters.

To summarize, this Request seeks records pertaining to the investigation named Oxferd Comma.

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.

The White House Government Transparency Task Force has released 3 new FBI memos, revealing for the first time that the FBI predicated the obstruction case against President Trump – codenamed Oxferd Comma – on the concern that Trump may have been an asset of Russian leader Vladimir Putin.²

One of the FBI memos, dated May 16, 2017, shows that the FBI opened:

¹ 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.

² John Solomon, *FBI Secretly Opened Probe Alleging Trump Fired Comey Because He Was a Russian Asset, Declassified Memos Show*, THE WHITE HOUSE (Aug. 5, 2026), <https://www.whitehouse.gov/releases/2026/08/fbi-secretly-opened-probe-alleging-trump-fired-comey-because-he-was-a-russian-asset-declassified-memos-show/>.

a full investigation based on an articulable factual basis that reasonably indicates that [President Trump] may be or has been, wittingly or unwittingly, involved in activities for or on behalf of the Government of the Russian Federation which may constitute violations of federal criminal law or threats to the national security of the United States.³

The investigation was designated as a “sensitive” matter and “the least intrusive method to address the serious national security risk posed by the activities alleged.”⁴ The goal was “to determine if President Trump . . . was directed by, controlled by, and/or coordinated activities with, the Russian Federation in a manner constituting a threat to the national security of the United States and/or a violation of federal criminal statutes” and “whether President Trump . . . obstructed and/or conspired to obstruct any associated FBI investigation.”⁵

The memo, written by the FBI’s counterintelligence division and approved by then-FBI General Counsel James Baker and then-Assistant Director for Counterintelligence William Priestap, made clear the concerns about Russian influence and obstruction included Comey’s firing, in part because of the public explanations Trump gave for it.⁶ Namely, in a televised interview on May 11, 2017, President Trump stated that he:

was gonna fire [Comey] regardless of the recommendation . . . And in fact when I decided to just do it, I said to myself . . . this Russia thing . . . is a made up story, it’s an excuse by the Democrats for having lost an election that they should have won.

“This alternative explanation can be reasonably read to imply that the FBI’s counterintelligence investigation was a factor in President Trump’s decision to terminate Comey,” the memo stated. Records would later show Comey was fired on the merits because the DOJ believed he mishandled the Hillary Clinton email investigation, and the DOJ’s independent inspector general concluded that Comey “violated long-standing department practice and protocol” with his conduct in the Clinton case.⁷

Both Acting FBI Director Andrew McCabe and Deputy Attorney General Rod Rosenstein were advised that the probe had been launched.⁸ The FBI’s investigation prompted the appointment of Special Counsel Robert Mueller by Rosenstein and a nearly two-year probe⁹ that “included the use of a variety of investigative techniques, to include grand jury subpoenas and interviews.”¹⁰ Mueller’s March 2019 report failed to “establish that members of the Trump

³ Fed. Bureau of Investigation, *Opening EC 1-2* (May 16, 2017) (declassified July 30, 2026), <https://www.whitehouse.gov/wp-content/uploads/2026/08/Oxford-Comma-Documents.zip>.

⁴ *Id.* 1.

⁵ *Id.* 2.

⁶ Solomon, *supra* note 2.

⁷ Off. of the Inspector Gen., U.S. Dep’t of Just., *A Review of Various Actions by the Federal Bureau of Investigation and Department of Justice in Advance of the 2016 Election* vi (June 2018), <https://oig.justice.gov/sites/default/files/reports/18-04.pdf>.

⁸ Fed. Bureau of Investigation, *Notification Documentation 1* (May 17, 2017) (declassified July 30, 2026), <https://www.whitehouse.gov/wp-content/uploads/2026/08/Oxford-Comma-Documents.zip>.

⁹ Solomon, *supra* note 2.

¹⁰ Fed. Bureau of Investigation, *Closing communication 2* (April 8, 2019) (declassified July 30, 2026), <https://www.whitehouse.gov/wp-content/uploads/2026/08/Oxford-Comma-Documents.zip>.

Campaign conspired or coordinated with the Russian government in its election interference activities.”¹¹ The FBI’s investigation was officially closed on April 8, 2019.¹²

A subsequent investigation by Special Counsel John Durham – released by the Biden Justice Department in 2023 – concluded there was no basis for the FBI to even open the original Crossfire Hurricane investigation into alleged Trump-Russia collusion.¹³

The FBI memos are being declassified by the White House Government Transparency Task Force as federal prosecutors investigate whether the FBI, DOJ, and intelligence agencies engaged in a conspiracy to violate the civil rights of President Trump and his associates through repeated baseless criminal investigations.¹⁴

RECORDS REQUESTED

For purposes of this Request, the term “record” means “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 Enter. Inst. v. Office of Sci. & Tech. Policy*, 827 F.3d 145 (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 “headquarters” and “Field Office” or any other **acronym** used herein has the definition as used in Federal Bureau of Investigation & Department of Homeland Security’s STRATEGIC INTELLIGENCE ASSESSMENT AND DATA ON DOMESTIC TERRORISM manual (hereinafter the SIADDT).

For purposes of this Request, the terms “Oxford Comma,” or “Oxford Comma,” includes any other alternative spelling, acronym, misspelling or abbreviation or any other term used to identify or reference that investigation.

For purposes of this Request, all terms otherwise used herein have the definitions given by FOIA, 5 U.S.C. § 552 *et seq.*

For purposes of this Request, and unless otherwise indicated, the timeframe of records requested herein is January 1, 2015, to the date this request is processed.

The ACLJ hereby requests the FBI to produce the following records.

¹¹ Robert S. Mueller, *Report on the Investigation into Russian Interference in the 2016 Presidential Election: Volume I of II*, DEP’T OF JUST. 2 (Mar. 2019), <https://www.justice.gov/archives/sco/file/1373816/dl?inline=>.

¹² *Closing communication*, *supra* note 10, at 1.

¹³ John H. Durham, *Report on Matters Related to Intelligence Activities and Investigations Arising Out of the 2016 Presidential Campaigns*, DEP’T OF JUST. 64 (May 12, 2023), <https://www.justice.gov/archives/sco-durham/media/1381211/dl>.

¹⁴ Solomon, *supra* note 2.

1. All records of the investigation named “Oxferd Comma.”
2. All records in the custody of James A. Baker and E.W. “Bill” Priestap in reviewing, approving, discussing, modifying, or authorizing Oxferd Comma.
3. All records of investigative steps directed at President Trump personally, including records concerning his communications, financial records, telephone records, electronic accounts, associates, family members, White House personnel, or Executive Office of the President records.
4. All records discussing whether firing the FBI Director constituted evidence of obstruction, counterintelligence activity, or conduct on behalf of Russia, including any legal, factual, counterintelligence, or prosecutorial analysis of that theory.
5. All records discussing the distinction or relationship between Oxferd Comma and Crossfire Hurricane.
6. All records in the custody of Jeannie Rhee concerning “Oxferd Comma,” “Oxford Comma,” “Trump,” “Putin,” “Russian asset,” “Russian agent,” “Comey,” “obstruction,” “Crossfire Hurricane,” or “Razor.”
7. All records in the custody of Andrew McCabe concerning “Oxferd Comma,” “Oxford Comma,” “Trump,” “Putin,” “Russian asset,” “Russian agent,” “Comey,” “obstruction,” “Crossfire Hurricane,” or “Razor.”
8. All records in the custody of Rod Rosenstein concerning Oxferd Comma, including records showing when and how he was informed of the investigation and what information concerning its predicate or scope was provided to him.
9. All records concerning whether Attorney General Jeff Sessions, Acting Attorney General Dana Boente, Deputy Attorney General Rod Rosenstein, or any other DOJ leadership official was informed that the FBI was investigating the sitting President for any alleged actions taken on behalf of or in concert or collusion with Russia or Russian interests.
10. All Woods Files, accuracy reviews, factual-validation records, source-evaluation records, and reliability assessments concerning information relied upon in Oxferd Comma, including material originating from Christopher Steele, Fusion GPS, or Crossfire Hurricane.
11. All records concerning whether Oxferd Comma produced evidence sufficient to recommend or support any federal criminal charge against President Trump or any other person.

12. The information contained in the document identified in footnote 334 of the Inspector General's report entitled "Review of Four FISA Applications and Other Aspects of the FBI's Crossfire Hurricane Investigation" (and subsequently declassified.)¹⁵
13. The "declassified summary" referenced in the AG September 24, 2020 letter to Sen. Graham.¹⁶
14. The emails of SCO Jean Rhee from November 1, 2016, to January 1, 2018, that contain the words "oxferd comma," "Flynn," Trump" "Crossfire Hurricane" or "Razor."

REQUEST FOR WAIVER OF FEES

The ACLJ requests a waiver of all fees for this request. Disclosure of the requested information to us is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in our commercial interest. The documents requested are to provide transparency on the perceived politicization of the FBI. Thank you for your consideration of this request.

CONCLUSION

If this Request is denied in whole or in part, the 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

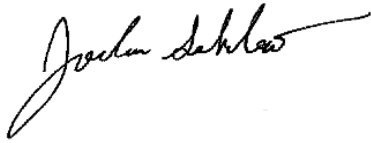


I affirm that the foregoing request and attached documentation are true and correct to the best of my knowledge and belief.

¹⁵ Letter from William P. Barr, Att'y Gen. of the U.S., to Lindsey Graham, U.S. Senator 1 (Sep. 24, 2020), <https://www.judiciary.senate.gov/imo/media/doc/AG%20Letter%20to%20Chairman%20Graham%209.24.2020.pdf>.

¹⁶ *Id.*

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jordan Sekulow".

Jordan Sekulow
Executive Director

A handwritten signature in black ink, appearing to read "Ben P. Sisney".

Benjamin P. Sisney
Senior Litigation Counsel

A handwritten signature in blue ink, appearing to read "John A. Monaghan".

John A Monaghan
Senior Litigation Counsel