

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JOSEPH KIRCHNER,

Plaintiff,

v.

MIKE JOHNSON, in his individual and official
capacity as Speaker of the United States House of
Representatives;
DONALD J. TRUMP, in his individual capacity as
former and current President of the United States;
PAMELA J. BONDI, in her individual and official
capacity as Attorney General of the United States;
BRENDAN T. CARR, in his individual and
official capacity as Chairman of the Federal
Communications Commission;
THE UNITED STATES HOUSE OF
REPRESENTATIVES;
ANTHROPIC PBC;
OPENAI, INC.;
APPLE INC.;
COMCAST CABLE COMMUNICATIONS, LLC;
METR (MODEL EVALUATION & THREAT
RESEARCH);
and DOES 1-20, unknown co-conspirators,
Defendants.

Case No. 1:25-cv-02735-ACR

**DISCOVERY-4:
GOVERNMENT
DEFENDANTS**

INTRODUCTION

This document replaces in its entirety the January 2026 draft of DISCOVERY-4. The rebuild follows two structural decisions:

- 1. Comcast-custodial requests** (FCC-1..10, COMCAST-1..25) moved to DISCOVERY-7 (Comcast) (April 23, 2026), which rebuilt them against the expanded D-series network-forensic record and the March 31, 2026 Anthropic source-code release (Ex. E-32 at p. 235, l. 3).
- 2. METR-custodial requests** (CHRISTIANO-1..6, BARNES-1..4, RAND-1..4) moved to DISCOVERY-1 (METR). DISCOVERY-1 now addresses Paul Christiano, Beth Barnes, and RAND Corporation as third-party custodians in their METR-related capacities. DISCOVERY-4

retains only the government-agency side of the Christiano multi-role analysis — specifically, the NIST AI Safety Institute as federal-agency custodian.

What remains in DISCOVERY-4:

- Mike Johnson (Speaker of the House)
- Donald J. Trump (President)
- Pamela J. Bondi (Attorney General)
- Brendan T. Carr (FCC Chairman)
- United States House of Representatives
- NIST AI Safety Institute (federal-agency requests)
- Inter-agency coordination (cross-branch, cross-defendant)

DEFINITIONS AND CONVENTIONS

For purposes of this discovery document, the following terms have the meanings given:

- **"Executive Office"** means the Executive Office of the President, including the White House, the Office of Science and Technology Policy (OSTP), the National Security Council (NSC), and any other direct office of the President.
- **"NIST AI Safety Institute"** means the US AI Safety Institute housed at the National Institute of Standards and Technology, and its successor(s) in interest.
- **"Relevant period"** means January 20, 2025 through the date of production, unless otherwise specified (capturing the second Trump administration period).
- **"Plaintiff's claims"** means any claim, cause of action, factual allegation, or theory of liability asserted by Plaintiff in this case.

Production format: Native-format records where feasible, subject to applicable classification and privilege review. Requests seeking classified material may be responded to through appropriate in-camera or CIPA-like procedures; blanket privilege assertions are not responsive.

PHASE A: MIKE JOHNSON (SPEAKER OF THE HOUSE) (21 DAYS)

Counts developed by this Phase: Compl., Count V (42 U.S.C. § 1985 Conspiracy), Compl., Count VI (RICO, 18 U.S.C. § 1962).

CATEGORY AA: EXECUTIVE-BRANCH COORDINATION

REQUEST NO. 1: All communications by Speaker Johnson, the Office of the Speaker, or designated staff with the Executive Office during the relevant period regarding:

- (a) AI-safety policy, including any regulatory or deregulatory initiative
- (b) Surveillance authorities or their reauthorization
- (c) Judicial nominations or administrative appointments implicating technology policy
- (d) Plaintiff or any issue Plaintiff has asserted publicly

REQUEST NO. 2: All communications by Speaker Johnson or the Office of the Speaker regarding Jeffrey Epstein–related materials, investigations, or concealment efforts during the relevant period, including:

- (a) Communications with the Executive Office
- (b) Communications with the Department of Justice
- (c) Communications with intelligence-community elements
- (d) Communications with any private person or entity regarding preservation, destruction, or classification of Epstein-related records

CATEGORY AB: HOUSE CLASSIFICATION AND OVERSIGHT

REQUEST NO. 3: All communications by Speaker Johnson or the Office of the Speaker regarding the classification, declassification, or restricted handling of records implicated in Plaintiff's claims, including any communication

directing or suggesting destruction or withholding from oversight committees.

REQUEST NO. 4: All documents regarding the Speaker's role in Oversight Committee agendas, subpoenas, or hearings during the relevant period that touch on any mechanism identified in Phases A through H of DISCOVERY-2 (Anthropic) or DISCOVERY-6 (Apple).

CATEGORY AC: HOUSE LEGISLATIVE AUTHORSHIP — AI CONTROL ARCHITECTURE AND COORDINATION WITH EXECUTIVE BRANCH

REQUEST NO. AC-1: Complete records concerning the House of Representatives' drafting, introduction, and passage of legislation containing AI control provisions during the relevant period — including without limitation H.R. 1 ("my one big beautiful bill" per Speaker Johnson's public characterization, Compl. ¶ 28) — and the relationship of those provisions to: (a) the AI control provisions rejected by the U.S. Senate 99-1; (b) the Genesis Mission Executive Order; (c) the rescission of Executive Order 14110 (Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence, October 30, 2023); and (d) any successor framework governing AI safety evaluation. For each: drafting iterations with authorship metadata; internal acknowledgments of the Senate's prior rejection; records of any coordination with the Executive Office of the President, NIST, the AI Safety Institute, or any corporate defendant regarding the substantive content of the provisions.

Evidentiary predicate: Compl. ¶ 28 pleads the Speaker's "Section 7 violations through legislative authorship ('my one big beautiful bill'), implementation through the Genesis Mission Executive Order of AI provisions Congress rejected 99-1, and coordination with corporate defendants" under *Youngstown Sheet & Tube Co. v. Sawyer*, 343 U.S. 579 (1952). Discovery establishes the legislative side of the cross-branch architecture pleaded as Article I/II violations and as the predicate for Compl., Count V (42 U.S.C. § 1985 Conspiracy) and Compl., Count VI (RICO, 18 U.S.C. § 1962).

REQUEST NO. AC-2: All communications (Slack, email, ticketing, project-management, Signal, WhatsApp, Wickr, Telegram, and equivalent records) during the relevant period between the Office of the Speaker, the House Rules Committee, the House Energy and Commerce Committee, the House Judiciary Committee, the House Oversight and Government Reform Committee, the House Permanent Select Committee on Intelligence, or any individual House Member, and any of: (a) the Executive Office of the President; (b) Anthropic PBC; (c) OpenAI, Inc.; (d) Apple Inc.; (e) METR; (f) the TED Foundation, Inc.; (g) RAND Corporation; (h) NIST or the AI Safety Institute; concerning the AI provisions of H.R. 1 (or any AI-related legislation), the Genesis Mission Executive Order, the rescission of EO 14110, the 2023 White House Voluntary AI Commitments, or any successor framework governing AI safety evaluation.

PHASE B: DONALD J. TRUMP (PRESIDENT) (21 DAYS)

Counts developed by this Phase: Compl., Count V (42 U.S.C. § 1985 Conspiracy), Compl., Count IV (Equal Protection / Fourteenth Amendment), Compl., Count VI (RICO, 18 U.S.C. § 1962).

CATEGORY BA: AI PROJECT AUTHORIZATIONS

REQUEST NO. 5: All communications by the President, the Executive Office, or the President's designees regarding authorization, direction, or oversight of the Stargate project, its predecessors, or its successors during the relevant period.

REQUEST NO. 6: All documents regarding Presidential directives, executive orders, or national-security memoranda authorizing:

- (a) Surveillance of litigation plaintiffs
- (b) Coordination between private AI model-providers and federal agencies
- (c) Discriminatory denial of federal benefits (SNAP or other) on criteria implicated in Plaintiff's claims
- (d) Targeting, harassment, or coordinated countermeasures against private individuals

CATEGORY BB: PUBLIC STATEMENTS AND DIRECTIVES

REQUEST NO. 7: All documents regarding any public statement or directive by the President during the relevant period that touched upon:

- (a) Identification or characterization of litigation plaintiffs
- (b) AI model-provider regulation or deregulation
- (c) Coordination with state attorneys general
- (d) Press or publisher targeting

REQUEST NO. 8: All records of communication between the President or the President's designees and Anthropic PBC, Apple Inc., OpenAI, Inc., or Comcast Cable Communications, LLC during the relevant period.

CATEGORY BC: GENESIS MISSION EXECUTIVE ORDER

REQUEST NO. BC-1: Complete records concerning the drafting, authorization, deployment, and implementation of the Genesis Mission Executive Order, including: (a) every drafting iteration with authorship metadata; (b) all internal legal analysis of Article I (legislative power), Article II (executive power), the Presentment Clause, the Appropriations Clause, and *Youngstown Sheet & Tube Co. v. Sawyer*, 343 U.S. 579 (1952), as applied to the Order's provisions; (c) all records regarding the U.S. Senate's 99-1 vote rejecting the AI control provisions later embedded in the Order, including any internal acknowledgment that the Executive Order implements provisions Congress affirmatively rejected; (d) all implementation directives issued to NIST, the AI Safety Institute, or any other federal agency or contractor; (e) all records regarding the Order's effect on private U.S. patents and patent applications, including without limitation Plaintiff's seventeen provisional patents identified at Compl. ¶ 580.

Evidentiary predicate: The Genesis Mission Executive Order is pleaded as a *Youngstown* Category Three executive action operating "at the lowest ebb" of presidential authority, implementing AI provisions Congress rejected 99-1. (Compl. ¶¶ 21(d), 28, 580; Memo

G.) Discovery establishes the authorial chain, the constitutional analysis (or absence thereof), and the implementation footprint — directly probative of Compl., Count III (Separation of Powers / Article I) and the declaratory-relief request at Compl. ¶ 21(d).

REQUEST NO. BC-2: All communications (Slack, email, ticketing, project-management, Signal, WhatsApp, Wickr, Telegram, and equivalent records) during the relevant period between the President, the Executive Office of the President, the Office of Management and Budget, the National Security Council, the Office of Science and Technology Policy, NIST, the AI Safety Institute, or any other federal-agency personnel, and any of: (a) Anthropic PBC personnel; (b) OpenAI, Inc. personnel; (c) Apple Inc. personnel; (d) METR personnel; (e) the TED Foundation, Inc.; (f) RAND Corporation; (g) any member of the U.S. Senate that voted on the AI provisions rejected 99-1; (h) any state attorney general, including without limitation regarding coordinated enforcement or non-enforcement; concerning the drafting, deployment, implementation, or effect of the Genesis Mission Executive Order — including any communications acknowledging or addressing the Order's effect on Plaintiff's seventeen provisional patents.

CATEGORY BD: VOLUNTARY SAFETY COMMITMENTS NULLIFICATION

REQUEST NO. BD-1: Complete records concerning the rescission of Executive Order 14110 (Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence, October 30, 2023) and the consequent legal status of the

July 21, 2023 White House Voluntary AI Commitments executed by Anthropic PBC, OpenAI, Inc., Apple Inc. (and other signatory frontier-model providers), including: (a) all internal records regarding the rescission decision, its drafting, and its constitutional and policy rationale; (b) all internal records analyzing whether and how the rescission affected the legal status, enforceability, or operational meaning of the 2023 Voluntary Commitments; (c) all records regarding the post-rescission framework (if any) replacing the 2023 Voluntary Commitments; (d) all records regarding METR's role as the third-party safety evaluator under the 2023 Voluntary Commitments, including the cessation of METR's evaluation of Anthropic after January 2025 (METR-9) and the six successive frontier-model releases by Anthropic over the following twelve months without independent evaluation (Compl. ¶ 17); and (e) all records regarding any executive-branch reliance on the corporate defendants' continued voluntary compliance after the rescission.

Evidentiary predicate: Compl. ¶ 17 documents the executive branch's reliance on METR — the third-party safety evaluator of Anthropic's compliance with the 2023 White House Voluntary Commitments — and METR's January 2025 (METR-9) discontinuation, followed by six successive Anthropic frontier-model releases (Opus 4 May 2025; Sonnet 4 Aug 2025; Sonnet 4.5 Oct 2025; Opus 4.6, Opus 4.7, Mythos through April 2026) without any independent evaluation. Discovery

establishes whether the Trump-administration nullification of EO 14110 left the corporate defendants in a regulatory void of their own choosing, supporting the conspiracy and operational-integration predicates of Compl., Count V and Compl., Count VI and the consumer-protection predicates of Compl., Count X (corporate defendants' continued public reliance on commitments no longer operative).

REQUEST NO. BD-2: All communications (Slack, email, ticketing, project-management, Signal, WhatsApp, Wickr, Telegram, and equivalent records) during the relevant period between executive-branch personnel and any of: (a) Anthropic PBC; (b) OpenAI, Inc.; (c) Apple Inc.; (d) any other 2023 Voluntary AI Commitments signatory; (e) METR; (f) the TED Foundation, Inc.; (g) RAND Corporation; concerning the rescission of Executive Order 14110, the legal status of the 2023 Voluntary Commitments after the rescission, or any successor framework (formal or informal) governing AI safety evaluation post-rescission — including any communications acknowledging that the corporate defendants' continued public statements regarding voluntary compliance lacked any operative regulatory framework.

PHASE C: PAMELA J. BONDI (ATTORNEY GENERAL) (IMMEDIATE)

Counts developed by this Phase: Compl., Count IV (Equal Protection / Fourteenth Amendment), Compl., Count V (42 U.S.C. § 1985 Conspiracy), Compl., Count VI (RICO, 18 U.S.C. § 1962).

CATEGORY CA: DECEMBER 4, 2025 MEMO (AI AUTHORSHIP)

REQUEST NO. 9: All records regarding the December 4, 2025 memorandum (the "Bondi Memo") issued under the authority of the Attorney General, including:

- (a) Every draft version (including drafts existing as AI-generated outputs)
- (b) The complete provenance chain: every person, account, system, and tool that touched the text between inception and issuance
- (c) Every AI system used to draft, revise, review, edit, or analyze any portion of the memorandum
- (d) Every identifier (Claude conversation UUID, OpenAI session ID, or analog) associated with AI invocations in connection with the drafting
- (e) Every log, audit trail, or server-side record of the AI invocations

Evidentiary predicate: The allegation that the Bondi Memo was drafted by Claude (Anthropic's model) is developed in the TAC and supported by the Anthropic enterprise-API discovery in DISCOVERY-2 Phase C (Ex. E-34, Finding SC-8 build-time discrimination).

REQUEST NO. 10: All documents identifying the enterprise or government API access to Anthropic or other AI-model infrastructure available to DOJ personnel during the relevant period, including:

- (a) The enterprise or government contracting vehicle
- (b) The set of API endpoints, model versions, and tools accessible
- (c) Any differential capability (bypass access, unrestricted mode, enterprise-only features) not available to public subscribers
- (d) The authentication, logging, and audit infrastructure for DOJ AI usage

- REQUEST NO. 11:** All communications between DOJ personnel and Anthropic PBC personnel during the relevant period regarding:
- (a) Enterprise API access
 - (b) Government procurement of AI services
 - (c) Any matter concerning Plaintiff, Plaintiff's claims, or this litigation
 - (d) The December 4, 2025 memorandum

CATEGORY CB: AG'S ROLE IN COORDINATION

- REQUEST NO. 12:** All communications by the Attorney General or the Office of the Attorney General during the relevant period regarding:
- (a) AI model-provider regulation or deregulation
 - (b) Coordination with state attorneys general on AI matters
 - (c) Surveillance of litigation plaintiffs
 - (d) The Epstein-related matters identified in REQUEST NO. 2
(Speaker Johnson, Phase A)
 - (e) Any matter implicating Plaintiff or Plaintiff's claims

- REQUEST NO. 13:** All records of DOJ involvement in coordination between federal agencies and private AI model-providers during the relevant period, including decision-making, directives, and briefings.

PHASE D: BRENDAN T. CARR (FCC CHAIRMAN) (21 DAYS)

Counts developed by this Phase: Compl., Count X (Consumer Protection / Deceptive Trade Practices), Compl., Count V (42 U.S.C. § 1985 Conspiracy), First Amendment claims.

CATEGORY DA: FCC CONTENT-RELATED ENFORCEMENT

- REQUEST NO. 14:** All communications by Chairman Carr or the Office of the Chairman regarding:
- (a) FCC content-related enforcement actions during the relevant period

- (b) Coordination with ISPs (including Comcast) on content-filtering, throttling, or DNS manipulation
- (c) Coordination with the Executive Office regarding press or content regulation
- (d) Plaintiff's claims regarding FCC involvement in ISP-level targeting

REQUEST NO. 15: All records of any FCC policy guidance, advisory, or informal directive to ISPs during the relevant period regarding:

- (a) Selective throttling of AI-platform traffic
- (b) DNS manipulation for AI-platform domains
- (c) Cooperation with law-enforcement or intelligence-community surveillance of named individuals
- (d) The specific ISP behaviors documented at Ex. D-23 at p. 125, l. 9 and Ex. D-33 at p. 200, l. 7

CATEGORY DB: ISP COORDINATION

REQUEST NO. 16: All communications by the Office of the Chairman with Comcast Cable Communications, LLC during the relevant period regarding Plaintiff, Plaintiff's IP range, or Plaintiff's service.

REQUEST NO. 17: All FCC records of complaints, petitions, or inquiries received during the relevant period relating to:

- (a) ISP RST injection (the subject of the 260,395+ packet record documented in the D-series)
- (b) DNS manipulation of AI-platform domains
- (c) Selective throttling
- (d) Router compromise via TR-069 protocol

PHASE E: NIST AI SAFETY INSTITUTE (30 DAYS)

Counts developed by this Phase: Compl., Count V (42 U.S.C. § 1985 Conspiracy), Compl., Count X (Consumer Protection / Deceptive Trade Practices).

Note: DISCOVERY-1 addresses Paul Christiano individually in his METR capacity. This Phase addresses the NIST AI Safety Institute as federal-agency custodian of records regarding Christiano's government role.

CATEGORY EA: CHRISTIANO APPOINTMENT AND CONFLICTS

REQUEST NO. 18: All documents regarding Paul Christiano's appointment to the NIST AI Safety Institute, including:

- (a) Ethics-disclosure forms submitted by Christiano
- (b) Conflict-of-interest analyses prepared by NIST or by the Department of Commerce
- (c) Recusal procedures established
- (d) Vetting documentation

Evidentiary predicate: B-8.

REQUEST NO. 19: All internal NIST AI Safety Institute communications discussing Christiano's concurrent roles (Anthropic Long-Term Benefit Trust; METR; UK AI Safety Institute), including:

- (a) Whether conflicts were identified
- (b) Risk assessments
- (c) Management strategies
- (d) Oversight procedures
- (e) Any acknowledgment that conflicts were identified but not effectively managed

CATEGORY EB: NIST RECOGNITION OF METR AND RSP-STYLE FRAMEWORKS

REQUEST NO. 20: All communications between NIST AI Safety Institute personnel and Anthropic PBC, OpenAI, Inc., or METR during Christiano's tenure regarding:

- (a) Frameworks or evaluation methodology

- (b) Government adoption of industry-developed approaches
- (c) Coordination of standards development
- (d) Industry influence on government policy

REQUEST NO. 21: All documents regarding US government adoption of RSP-style approaches, including:

- (a) Analysis of industry frameworks
- (b) Decision-making regarding adoption
- (c) Federal standards influenced by RSP
- (d) Coordination with industry stakeholders

Evidentiary predicate: B-4; B-5.

REQUEST NO. 22: All analyses of METR's independence and framework adequacy performed by NIST, the Department of Commerce, or the White House OSTP, including:

- (a) Due diligence on METR's independence
- (b) Assessment of financial dependencies
- (c) Evaluation of potential conflicts
- (d) Decisions to rely on METR evaluations

CATEGORY EC: US-UK AI SAFETY INSTITUTE COORDINATION

REQUEST NO. 23: All communications between the US NIST AI Safety Institute and the UK AI Safety Institute during the relevant period regarding:

- (a) Framework coordination or methodology harmonization
- (b) Evaluation-approach alignment
- (c) Recognition of METR as an acceptable evaluator
- (d) International safety-standard development
- (e) Coordination with Christiano serving both US and UK roles

REQUEST NO. 24: All documents regarding international coordination of AI-safety evaluation, including coordination with the EU AI Office, any other

national AI-safety body, and cross-border evaluation-methodology alignment.

PHASE F: INTER-BRANCH COORDINATION AND TIMELINE (21 DAYS)

Counts developed by this Phase: Compl., Count V (42 U.S.C. § 1985 Conspiracy), Compl., Count VI (RICO, 18 U.S.C. § 1962), Compl., Count IV (Equal Protection / Fourteenth Amendment).

CATEGORY FA: MULTI-BRANCH COORDINATION

REQUEST NO. 25: All records of coordination among the Executive, the Office of the Attorney General, the Office of the Speaker of the House, and the Office of the Chairman of the FCC during the relevant period regarding:

- (a) Any matter identified in Phases A through D
- (b) AI-safety or AI-regulation policy
- (c) Surveillance authorities, reauthorization, or expansion
- (d) Targeting of individuals in active federal litigation against federal officials

REQUEST NO. 26: All inter-agency task-force records, working-group minutes, or coordination memoranda during the relevant period that touch upon Plaintiff, Plaintiff's claims, or any matter identified in Phases A through E.

CATEGORY FB: TARGETING TIMELINE

REQUEST NO. 27: All records regarding any federal agency's knowledge of, coordination with, or authorization of the following events identified in Plaintiff's forensic record:

- (a) The January 7-8, 2026 13-hour RST injection attack (Ex. E-24 at p. 159, l. 2)
- (b) The January 9, 2026 peak RST attack (Ex. D-7 at p. 38, l. 11)
- (c) The February 25, 2026 50,516-RST peak event (Ex. D-25 at p. 134, l. 16)
- (d) The March 12, 2026 multi-vector attack (Ex. D-26 at p. 137, l. 17)
- (e) The March 17-22, 2026 sustained campaign (Ex. D-28 at p. 147, l. 9)
- (f) The October 29, 2025 Comcast TR-069 ghost session (documented in DISCOVERY-7 Category E)

REQUEST NO. 28: All FBI, NSA, or other intelligence-community records referencing Plaintiff, Plaintiff's IP range, Plaintiff's Apple account, or Plaintiff's claims during the relevant period.

PHASE G: ALL-DEFENDANT COMMUNICATIONS PLATFORMS (21 DAYS)

Note: This Phase is directed to each government-defendant custodian uniformly; responsive records residing in each custodian's possession are subject to production.

Counts developed by this Phase: Compl., Count V (42 U.S.C. § 1985 Conspiracy), Compl., Count VI (RICO, 18 U.S.C. § 1962).

REQUEST NO. 29: All internal communications platforms (Slack, Teams, Discord, Signal, Telegram, or other) used by any person within the Executive Office, the Office of the Speaker, the Office of the Attorney General, or the FCC Office of the Chairman during the relevant period for communications concerning any matter identified in Phases A through F, including:

- (a) Complete channel histories
- (b) Channel-membership lists and access logs

(c) Deleted or archived channels with complete contents

(d) Direct messages and huddle transcripts

REQUEST NO. 30: All video-conferencing recordings and transcripts (Zoom, Teams, WebEx, Signal, Wickr, or other) from meetings implicating any matter identified in Phases A through F.

REQUEST NO. 31: All internal documentation-platform contents (Confluence, SharePoint, Notion, GitHub wikis, or classified analogs) referencing any matter identified in Phases A through F.

PHASE H: PRESERVATION AND EXPERT DISCLOSURE (IMMEDIATE / 30 DAYS)

REQUEST NO. 32: Complete documentation of every preservation hold, litigation hold, or legal hold issued by any government-defendant custodian during the relevant period with respect to any matter identified in this discovery document.

REQUEST NO. 33: All documents regarding destruction, deletion, overwriting, or classification-based withholding of electronically stored information implicated by this discovery during the relevant period.

REQUEST NO. 34: Identify every person within each government-defendant custodian's employ or service who has personal knowledge of the matters identified in Phases A through G.

REQUEST NO. 35: Identify every expert witness each government-defendant custodian intends to offer on any subject addressed in Phases A through G.

PHASE I: SPECIFIC EVENTS AND NAMED INDIVIDUALS (21 DAYS)

Counts developed by this Phase: Compl., Count V (42 U.S.C. § 1985 Conspiracy), Compl., Count VI (RICO, 18 U.S.C. § 1962), Compl., Count IV (Equal Protection / Fourteenth Amendment).

CATEGORY IA: "LEE" SURVEILLANCE CONTACT (APRIL 12, 2025, CROWDED TAVERN 23, EDINA, MN)

REQUEST NO. 36: All federal-agency records (FBI, NSA, DHS, Secret Service, DOJ National Security Division, IRS Criminal Investigation, or other) of surveillance, targeting, or information collection concerning Plaintiff on or about April 12, 2025 at or near Crowded Tavern 23, 50th & France commercial district, Edina, Minnesota, including:

- (a) Identification of the individual identifying himself as "Lee";
- (b) The authorization chain for any observation of Plaintiff at that location;
- (c) The source of information about Plaintiff's conversation topics that guided the individual's approach;
- (d) All records regarding Plaintiff's patent filings or technology concepts that may have triggered targeting.

Evidentiary predicate: Pleading ¶ 3 (Compl. ¶ 7); Affidavits A and B.

REQUEST NO. 37: All records of any federal agency's access to, monitoring of, or correlation with Plaintiff's April 2025 electronic communications concerning the Laws of Existence framework, patent drafting, or AI-company investigation, including any communications that may have

been intercepted or summarized before the April 12, 2025 "Lee" contact occurred.

CATEGORY IB: TWELVE FBI AGENTS — JULY 2, 2025 SCRIPTED REFUSAL

REQUEST NO. 38: The identities of the twelve (12) FBI agents who on July 2, 2025 refused to accept Plaintiff's federal crime reports and each employed the identical scripted language "I do not consent to recording" before terminating the calls, including for each agent:

- (a) Full name and badge / employee identifier
- (b) Unit, field office, and reporting chain
- (c) The training document, script, or operational guidance from which the "I do not consent to recording" language was derived
- (d) The identity of the approving supervisor or training officer
- (e) All communications among the 12 agents, supervisors, and headquarters regarding Plaintiff's calls on July 2, 2025

Evidentiary predicate: Pleading ¶¶ 9, 105 (Compl. ¶ 119); Ex. A-12.

REQUEST NO. 39: Complete recordings (audio or otherwise) of all twelve of Plaintiff's July 2, 2025 calls to FBI field offices, and the corresponding call-detail records (incoming number, destination extension, call duration, disposition code) from FBI telephonic infrastructure.

REQUEST NO. 40: All FBI training materials, standard operating procedures, or operational guidance documents in effect on July 2, 2025 that addressed:

- (a) Response to federal crime reports from private individuals in active federal litigation against federal officials;
- (b) The phrase "I do not consent to recording" as scripted language;

- (c) The decision to terminate calls rather than accept written follow-up;
- (d) Identification, intake, or documentation of reports citing coordinated federal-state ultra vires conduct.

CATEGORY IC: MINNESOTA AG KEITH ELLISON — PERSONAL AND OFFICE RECORDS

REQUEST NO. 41: Complete drafting records, approval chain, and internal communications for the February 26, 2026 letter from the Minnesota Attorney General's Office to Plaintiff, including: (a) every draft version; (b) the drafting attorney's identity and assignment record; (c) all communications between the MN AG's office and the US Department of Justice during the drafting period; (d) all internal MN AG analyses of Minn. Stat. § 8.31, subd. 1 and whether the letter's disclaimer accurately reflects the statute's mandatory "shall investigate" command.

Evidentiary predicate: Pleading ¶ 40 (Compl. ¶ 44).

REQUEST NO. 42: The complete March 4, 2026 sworn congressional testimony transcript of Attorney General Keith Ellison, with all prepared remarks, any supplemental written submissions, and any notes, emails, or communications surrounding the testimony concerning consumer-fraud prosecutorial authority.

REQUEST NO. 43: All communications between the MN AG's Office and: (a) Anthropic PBC, OpenAI, Inc., Apple Inc., or Comcast Cable Communications, LLC; (b) any other state Attorney General's office concerning Plaintiff

or Plaintiff's claims; (c) the federal Department of Justice concerning Plaintiff; (d) any law firm representing any defendant in this action.

CATEGORY ID: DOJ CIVIL RIGHTS DIVISION APRIL 6, 2026 FORM LETTER

REQUEST NO. 44: Complete authorship record for the unsigned April 6, 2026 letter sent to Plaintiff by the Civil Rights Division of the US Department of Justice, including:

- (a) The drafting attorney's identity
- (b) The approval chain
- (c) The specific intake procedure that resulted in Plaintiff's Rule 4(i)(1)(B) service of the summons and Second Amended Complaint being classified as a "report"
- (d) All internal communications concerning Plaintiff's service on the Attorney General between March 3, 2026 (service date) and April 10, 2026
- (e) Any AI systems (Claude, GPT, or other) used to draft, review, or generate any portion of the letter, including all invocation logs and conversation identifiers

Evidentiary predicate: Ex. A-14 (Supplemental Notice of Service Effectuation, Ex. 2; April 6, 2026 DOJ Civil Rights Division letter to Plaintiff).

REQUEST NO. 45: All DOJ Civil Rights Division records of other similar instances during the relevant period in which a federal civil complaint served under Rule 4(i)(1)(B) was characterized by the Division as a "report" rather than as litigation-service, and the frequency of that characterization compared to standard handling.

CATEGORY IE: BESSENT-POWELL WALL STREET CEO CONVOCATION

- REQUEST NO. 46:** All records, memoranda, briefing papers, attendance records, and transcripts of the convocation held by Treasury Secretary Scott Bessent and Federal Reserve Chair Jerome Powell with Wall Street CEOs to discuss Anthropic's Mythos model, including:
- (a) The specific institutions represented and their CEO / senior officer attendees
 - (b) The complete briefing materials distributed or presented
 - (c) Transcripts, minutes, or contemporaneous notes
 - (d) Pre-convocation and post-convocation communications with Anthropic PBC
 - (e) Any commitment, understanding, or representation made during the convocation concerning Mythos distribution, access, or pricing
- Evidentiary predicate:** Pleading ¶ 72 (Compl. ¶ 79).

- REQUEST NO. 47:** All communications between the Treasury Department, the Federal Reserve Board, and Anthropic PBC during the relevant period concerning: (a) the Mythos model; (b) the Project Glasswing distribution; (c) systemic-risk implications of AI model deployment; (d) coordination between AI industry and financial-services regulators.

CATEGORY IF: FLORIDA AG UTHMEIER APRIL 21, 2026 INVESTIGATION

- REQUEST NO. 48:** Production through subpoena to the Florida Attorney General's Office of all records concerning the April 21, 2026 investigation opened by FL AG Uthmeier of the corporate AI defendants named in this action, including:
- (a) The complete investigation opening memorandum
 - (b) Scope of investigation

- (c) Preservation and subpoena records to corporate targets
- (d) Any records referencing Plaintiff, Plaintiff's *Kirchner v. Ellison* pleadings, or related evidence
- (e) All communications with any state or federal agency concerning the investigation

Evidentiary predicate: Pleading ¶ 40 (Compl. ¶ 44).

REQUEST NO. 49: All communications between the Minnesota AG's Office and the Florida AG's Office during April 2026 concerning AI-industry enforcement authority, consumer-fraud prosecutorial authority, or Plaintiff.

**CATEGORY IG: DHS-ICE USE OF FORCE REDACTION FOLLOWING ICE
DEPLOYMENT TO MINNESOTA AND RENEE GOOD'S SHOOTING (JANUARY 7–8,
2026)**

REQUEST NO. IG-1: Complete records concerning DHS-ICE Directive 19009.3 (Firearms and Use of Force) and its redaction during the relevant period, including: (a) the complete unredacted text of the Directive; (b) all FOIA-related correspondence, requests, and decisions invoking 5 U.S.C. § 552(b)(7)(E) (or any equivalent withholding rationale) to redact the Directive's text; (c) all records concerning the methodology, scope, authorization, and personnel responsible for the redaction; (d) all records regarding the January 7, 2026 fatal shooting of Renee Nicole Good in Minneapolis, Minnesota by ICE Agent Jonathan Ross, including the contemporaneous use-of-force report, the on-scene chain of custody, and any after-action review; (e) all records regarding the announcement, on or about January 8, 2026, that the federal

investigation would focus on Renee Good's alleged "network" rather than on Agent Ross; (f) all records concerning the deployment of ICE personnel to Minnesota during the period preceding and following January 7, 2026, including deployment authorization, rules of engagement, and coordination with state and local authorities; and (g) all records regarding the parallel January 24, 2026 killing of Alex Pretti by federal agents in Minnesota, to the extent connected to the same deployment or use-of-force framework.

Evidentiary predicate: Compl. App. A ¶¶ 334–337 (ECF No. 51-13) and Compl. App. M ¶¶ 92–98 (ECF No. 51-23) plead the January 7, 2026 ICE killing of Renee Good, the January 8, 2026 Vance pre-investigation press conference declaring "justified" / "absolute immunity," and the complete redaction of DHS-ICE Directive 19009.3 as together satisfying the 18 U.S.C. § 2331(5) domestic terrorism elements (acts dangerous to human life; appearing intended to intimidate a civilian population; appearing intended to influence government conduct). Exhibit A-5 (ECF No. 51-34) contains the verbatim Vance press conference transcript. Discovery establishes the policy and authorization architecture supporting Compl., Count IV (Equal Protection), Compl., Count V (42 U.S.C. § 1985 Conspiracy), Compl., Count VI (RICO), and the structural-due-process predicates of Compl., Count III (Fifth Amendment).

REQUEST NO. IG-2: All communications (Slack, email, ticketing, project-management, Signal, WhatsApp, Wickr, Telegram, and equivalent records) during the relevant period between any of: the Office of the President; the Office of the Vice President; the Office of the Attorney General; DHS (including the Office of the Secretary, ICE leadership, and the Office of General Counsel); DOJ (including the Civil Rights Division and the Office of Legal Counsel); the FBI; and any other federal agency, state attorney general, state law enforcement agency, or state-government office; concerning: (a) the redaction of DHS-ICE Directive 19009.3; (b) the January 7, 2026 fatal shooting of Renee Nicole Good; (c) the January 8, 2026 Vance press conference declaring the shooting "justified" and asserting "absolute immunity"; (d) the announcement that the federal investigation would focus on Good's alleged "network" or on "broader left-wing networks" or "domestic terrorism networks" rather than on Agent Ross; (e) the deployment of ICE personnel to Minnesota during the relevant period; (f) the off-duty Minnesota police officers (including the female officer of color described by Brooklyn Park Police Chief Bruley) reported as targets of armed traffic stops by ICE during the same period (Compl. App. M ¶¶ 95–96); and (g) the January 24, 2026 federal killing of Alex Pretti to the extent connected to the same deployment or use-of-force framework.

**PHASE J: FRE 901/607 CONFLATION AND "CREDIBLE EVIDENCE" FRAUDULENT
LEGAL FRAMEWORK (21 DAYS)**

Counts developed by this Phase: Compl., Count V (42 U.S.C. § 1985 Conspiracy), Compl., Count VI (RICO, 18 U.S.C. § 1962, including § 1512 Obstruction and § 1343 Wire-Fraud Predicates), Compl., Count IV (Equal Protection / Fourteenth Amendment).

Note: This Phase is directed jointly to the Office of the Attorney General (Phase C custodian, Bondi); the Office of the Speaker of the House (Phase A custodian, Johnson); the Executive Office of the President (Phase B custodian, Trump); the Office of the Vice President (Vance) and the Federal Bureau of Investigation (Director Patel) as additional government-defendant custodians of record under App. A and Ex. A-1. The thirty cataloged events at Exhibit A-1 §§ II through XXX establish a 43-day cross-branch deployment (July 7 through August 18, 2025) of an executive-branch-invented legal framework conflating Federal Rule of Evidence 607 (impeaching one's own witness) and Federal Rule of Evidence 901 (authentication standards) to claim authority to filter "non-credible" evidence from disclosure — a framework abandoned by all defendants within twenty-four hours of Plaintiff's August 19, 2025 complaint filing and resumed November 18, 2025 in opposition to H.R. 4405. The pleading record is at App. A §§ II.E, II.F, II.Q, III.A.3, III.A.7, and III.B.1; the documentary record is at Ex. A-1 §§ II through XXX.

CATEGORY JA: JULY 7, 2025 DOJ MEMORANDUM — PROVENANCE

REQUEST NO. 50: All records regarding the July 7, 2025 unsigned Department of Justice memorandum claiming "no credible evidence found that Epstein blackmailed prominent individuals" and "We did not uncover evidence that could predicate an investigation against uncharged third parties" — the operative document establishing the fraudulent "credible

evidence" filtering framework subsequently adopted across the Speaker, the Executive, the Vice President, and the FBI Director — including:

- (a) Every draft version (including drafts existing as AI-generated outputs)
- (b) The complete provenance chain: every person, account, system, and tool that touched the text between inception and issuance
- (c) Every AI system used to draft, revise, review, edit, or analyze any portion of the memorandum, with conversation identifiers, invocation logs, and server-side audit records
- (d) Every approval signature solicited but not received (the memo issued unsigned)
- (e) All internal communications between June 1, 2025 and July 7, 2025 regarding the memorandum's drafting, review, and decision to issue without signature
- (f) All internal legal analysis of whether the "credible evidence" filtering language conflicts with Federal Rules of Evidence 607 and 901
- (g) All internal acknowledgment that the framework departs from the standard prosecutorial sufficiency framework

Evidentiary predicate: Pleading at App. A ¶¶ 60-66; Ex. A-1 §§ II.E, II.F (cross-referenced throughout the exhibit). Parallel structure to existing REQUEST NO. 9 (December 4, 2025 Bondi Memo provenance).

CATEGORY JB: CROSS-BRANCH LINGUISTIC COORDINATION (43-DAY DEPLOYMENT WINDOW)

REQUEST NO. 51: All communications between or among the following custodians during the period June 1, 2025 through August 31, 2025 referencing or

coordinating the use of the terms "credible evidence," "credible information," "credible files," "swept up," "innocent persons," or any analog filter applied to the disclosure of Epstein-related materials:

- (a) Office of the Attorney General (Bondi)
- (b) Office of the Speaker of the House (Johnson)
- (c) Executive Office of the President (Trump and senior advisors)
- (d) Office of the Vice President (Vance)
- (e) Federal Bureau of Investigation (Director Patel)
- (f) Department of Transportation (Secretary Duffy, in connection with his July 16, 2025 congressional testimony)

For each communication, production shall include: (a) the originating custodian; (b) the receiving custodians; (c) any drafted talking points, messaging guidance, or coordinated-response materials using the term; (d) any internal acknowledgment that the term lacks legal authority under Federal Rules of Evidence 607 and 901.

Evidentiary predicate: App. A §§ II.E, II.F (cross-branch coordination); Ex. A-1 §§ V (Patel), VI (Trump), VII (Johnson), VIII (Duffy), IX (Trump press conference), XV (Vance).

CATEGORY JC: MASSIE-KHANNA RULES COMMITTEE VOTE PREVENTION

REQUEST NO. 52: All records regarding Speaker Johnson's prevention of the Rules Committee vote on the Massie-Khanna Epstein Files Transparency Resolution and on the related discharge petition obstruction, including:

- (a) All Speaker, Office of the Speaker, and House Majority Leadership communications regarding the discharge petition and the Rules Committee's consideration
- (b) All communications with the Executive Office regarding the vote-prevention strategy
- (c) The legal advice received and the legal advice provided to the Rules Committee Chair regarding scheduling

- (d) All internal records establishing the basis for Johnson's claimed technical defects in the Resolution (specifically, the wrong-code-section claim and the grand-jury-release claim documented as 100% false at App. A ¶¶ 33-49, 124-126, 130-135)
- (e) All records concerning the September 2, 2025 "inartfully drafted" obstruction characterization

Evidentiary predicate: App. A §§ II.C, II.D, III.A.3; Ex. A-1 §§ X, XI, XII, XXIV.

CATEGORY JD: H.RES. 5 "CREDIBLE EVIDENCE" FALSE CLAIM

REQUEST NO. 53: All records establishing the legal basis for Speaker Johnson's repeated public claim that "the house rules resolution sets a good standard and requires all credible evidence to be released" — when H.Res. 5 (House Rules of the 119th Congress) contains zero references to credible evidence, Epstein, or disclosure requirements — including:

- (a) All legal advice received from the House Office of General Counsel or external counsel supporting the claim
- (b) All drafts of public statements containing the claim
- (c) All internal acknowledgment that the claim is unsupported by H.Res. 5's text
- (d) All communications with Executive-branch counterparts regarding adoption of the claim into the cross-branch messaging architecture

Evidentiary predicate: App. A ¶¶ 39, 124, 132; Ex. A-1 § X.

CATEGORY JE: NOVEMBER 18, 2025 H.R. 4405 FLOOR MEMORANDUM

REQUEST NO. 54: All records regarding Speaker Johnson's November 18, 2025 floor memorandum entitled "How the Flaws of H.R. 4405 Could Re-Victimize Epstein's Victims, Create New Victims, and Damage the Judicial System," including:

- (a) Every draft version of the memorandum
- (b) The identities of the lawyers Johnson described publicly as a "small army of lawyers" working on the memorandum
- (c) The approval chain
- (d) The legal-research files supporting the November 21, 2025 claim that 18 U.S.C. § 2256 does not define "child sexual abuse material" — when § 2256(8) defines "child pornography" as the synonymous statutory term
- (e) All communications regarding the decision to vote YES on H.R. 4405 while simultaneously claiming the bill "could revictimize Epstein's victims" and "must be amended"
- (f) All communications regarding the choice of an "amend in Senate" obstruction strategy rather than NO-vote opposition

Evidentiary predicate: App. A ¶¶ 147-158; Ex. A-1 §§ XXVIII, XXIX, XXX.

**CATEGORY JF: BONDI PRE-APPOINTMENT VS. POST-APPOINTMENT
ANALYTICAL REVERSAL**

REQUEST NO. 55: All records regarding Attorney General Bondi's analytical reversal between her November 22, 2024 pre-appointment legal analysis (correctly distinguishing victims from criminal associates and applying the standard prosecutorial sufficiency framework) and her February 27, 2025 post-appointment claim of transparency while controlling redactions, including:

- (a) All internal DOJ records of the November 2024 through February 2025 transition period regarding evidentiary frameworks for Epstein-related disclosures
- (b) All communications between Bondi (or her transition team) and any incoming DOJ personnel regarding the framework

- (c) All documents establishing the institutional decision to abandon the standard sufficiency framework in favor of the "credible evidence" filtering framework
- (d) Bondi's communications during the period regarding the Federal Rules of Evidence and their application to disclosure decisions
- (e) All records regarding the relationship between the analytical reversal and the July 7, 2025 unsigned DOJ memorandum

Evidentiary predicate: App. A ¶¶ 158, 168-170; Ex. A-1 §§ III, IV.

CATEGORY JG: FBI DIRECTOR PATEL — AUTOPSY EVIDENCE BRIEFINGS

- REQUEST NO. 56:** All Federal Bureau of Investigation records regarding briefings provided to Director Patel during 2025 concerning the Jeffrey Epstein death investigation, including:
- (a) The complete autopsy evidence record provided to the Director
 - (b) Any contemporaneous Bureau analysis acknowledging or rebutting the autopsy findings
 - (c) All briefing materials prepared for Director Patel on the topic
 - (d) All training materials, briefing notes, or talking points addressing public discussion of the autopsy evidence
 - (e) All communications regarding the June 6, 2025 Joe Rogan podcast appearance in which Director Patel demonstrated unfamiliarity with the autopsy evidence
 - (f) All internal communications regarding the September 16, 2025 testimony limiting the investigation scope to "FBI only"
- Evidentiary predicate:** Ex. A-1 § V.

CATEGORY JH: "SWEPT UP" / "INNOCENT PERSONS" PROTECTION CRITERION

- REQUEST NO. 57:** All records establishing the operative protection criterion repeatedly invoked by Speaker Johnson and adopted into the cross-branch messaging architecture for protecting "innocent people," "innocent

persons," persons "swept up" in the Epstein investigation, or any analog formulation, including:

- (a) The operational definition applied to determine inclusion in the protected class
- (b) The legal advice received establishing that wealthy uncharged associates fall within the protected class
- (c) The reconciliation analysis between the protection criterion and the Federal Rules of Evidence's authentication and impeachment standards
- (d) All communications regarding the linguistic shift from "victims" to "innocent persons" / "swept up" associates documented at App. A ¶¶ 53-54

Evidentiary predicate: App. A ¶¶ 53-54; Ex. A-1 §§ XIII (Johnson "swept up" language), XXVIII (innocent persons memorandum).

CATEGORY JI: TRUMP-FBI-INFORMANT NARRATIVE DEPLOYMENT (SEPTEMBER 5–9, 2025)

REQUEST NO. 58: All records regarding the development, deployment, and walkback of the Speaker's September 5–9, 2025 narrative claiming Trump was an FBI informant requiring protection in connection with Epstein-related disclosures, including:

- (a) All drafts of the original September 5, 2025 statement
- (b) All legal advice received supporting the FBI-informant narrative
- (c) All communications between the Office of the Speaker and FBI personnel during the period
- (d) All communications regarding the September 8–9, 2025 walkback decision
- (e) All internal analysis acknowledging the narrative was unsupportable

Evidentiary predicate: Ex. A-1 §§ XXV, XXVI, XXVII.

CATEGORY JJ: CROSS-DEFENDANT MESSAGING-PLATFORM RECORDS

REQUEST NO. 59: All internal messaging-platform records (Slack, Microsoft Teams, Signal, Telegram, WhatsApp, Wickr, or analog channels) used by personnel within the Office of the Attorney General, the Office of the Speaker of the House, the Executive Office of the President, the Office of the Vice President, and the Federal Bureau of Investigation Director's Office during the period June 1, 2025 through December 31, 2025 referencing any of: "credible evidence," "credible information," "credible files," "swept up," "innocent persons," "FRE 607," "FRE 901," "Rule 607," "Rule 901," authentication standards, the Massie-Khanna resolution, H.R. 4405, or any Epstein-related materials. Production shall include channel histories, channel-membership lists, deleted or archived channels, direct messages, huddle transcripts, and ephemeral-messaging-platform content otherwise subject to auto-deletion. Parallel and additive to the production sought at REQUEST NO. 29 (Phase G).

Evidentiary predicate: App. A §§ II.E, II.F, III.A.7; Ex. A-1 (full Exhibit record).

PRESERVATION NOTICE

This request serves as express notice under Federal Rule of Civil Procedure 37(e) that each government-defendant custodian served with this discovery is on notice of the following

categories of electronically stored information (ESI) subject to preservation obligation. Routine destruction is expressly prohibited:

1. All communications between and among the Executive Office, the Office of the Attorney General, the Office of the Speaker of the House, the Office of the Chairman of the FCC, and the NIST AI Safety Institute regarding matters identified in this document.
2. All drafting records (and all AI-invocation logs in connection therewith) for the December 4, 2025 Attorney General memorandum.
3. All NIST AI Safety Institute records regarding Paul Christiano's appointment, ethics disclosures, and conflict-management procedures.
4. All communications with Anthropic PBC, OpenAI, Inc., Apple Inc., Comcast Cable Communications, LLC, and METR.
5. All records regarding surveillance authorities implicated by Plaintiff's forensic record, including NSL, FISA, and emergency-disclosure records.
6. All Slack, Signal, and other instant-messaging content regarding matters identified in this discovery document, including ephemeral-messaging-platform content that would ordinarily be subject to auto-deletion.
7. All drafting records, AI-invocation logs, and approval-chain records for the July 7, 2025 unsigned DOJ memorandum and the November 18, 2025 Speaker floor memorandum on H.R. 4405.
8. All cross-branch communications during the 43-day deployment window (July 7, 2025 through August 18, 2025) referencing "credible evidence," "credible information," "swept up," or "innocent persons" filters applied to Epstein-related disclosures.

9. All records of legal advice received by Speaker Johnson and Attorney General Bondi during 2025 regarding Federal Rules of Evidence 607 and 901 and their application to disclosure decisions concerning Epstein-related materials.

Respectfully submitted,

/s/ Joseph Kirchner

Joseph Kirchner

Pro Se Plaintiff

4440 Parklawn Avenue #203

Edina, MN 55435

Telephone: (612) 552-2122

Email: legal@lawsofexistence.com

Dated: May 5, 2026

CERTIFICATE OF SERVICE

I hereby certify that on the date shown above, a true and correct copy of the foregoing was served on counsel of record by the Court's CM/ECF electronic filing system. Those who have not appeared will be served by United States certified mail, return receipt requested, same day or on the next business day, at the addresses on file with the Court.

/s/ Joseph Kirchner

Joseph Kirchner

Pro Se Plaintiff