

August 29, 2025

U.S. Department of State  
Information Access Liaison Office, A/SKS/IAP/IAL  
2201 C Street N.W., Suite B266  
Washington, D.C. 20520-0000

Re: Freedom of Information Request

To Whom It May Concern:

This letter constitutes a request made pursuant to the Freedom of Information Act, 5 U.S.C. § 552, and implementing regulations of the United States Department of State, 22 C.F.R. § 171.1 *et seq* (“State Department”).

On August 12, 2025, the U.S. Department of State released the 2024 *Country Reports on Human Rights Practices*, which documents the status of human rights in nearly 200 countries and territories. The annual *Country Reports on Human Rights Practices* (“Human Rights Reports”) are required by Sections 116(d) and 502B(b) of the Foreign Assistance Act of 1961. 19 U.S.C. §§ 2464 and 2467 also require that U.S. foreign and trade policy take into account countries’ human rights performance and that country reports be submitted to the Congress on an annual basis.

Since 2011, this congressionally mandated report has addressed the status of sexual and reproductive health and rights worldwide, providing valuable insights into the legality of abortion, access to contraception, freedom from discrimination and coercion in health care, and maternal health care. In previous years, including every year from 2012 to 2017 (encompassing the 2011 to 2016 Human Rights Reports) and again from 2021 to 2024, the Human Rights Reports included a subsection titled “Reproductive Rights” under Section 6 (“Discrimination, Societal Abuses, and Trafficking in Persons”). The Reproductive Rights subsection often included research on the impact of laws restricting access to reproductive health care around the world, including reporting on whether individuals “have the right to decide the number, spacing, and timing of their children; manage their reproductive health and have access to the information and means to do so.” Past Human Rights Reports have also contained, within the Reproductive Rights subsection, mentions of the availability of contraception, rates of maternal mortality, and civil society concerns about total abortion bans. The Reports are relied on globally by policymakers, advocates, judges, journalists, academics, and human rights bodies, and are used to hold governments accountable for human rights abuses.

The 2024 Human Rights Reports have removed the subsection titled “Reproductive Rights” entirely.<sup>1</sup> Instead, the 2024 Human Rights Reports contains only coverage of coerced abortion or involuntary sterilization by the government in a section titled “Coercion in

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<sup>1</sup> Graham Smith, *State Department slashes its annual reports on human rights*, NAT’L PUB. RADIO, Aug. 12, 2025, <https://www.npr.org/2025/08/12/nx-s1-5495621/state-department-human-rights-reports-slashed>.

Population Control.”<sup>2</sup> While both coerced abortion and involuntary sterilization are egregious human rights violations, the scope of the reports must be broadened to encompass all forms of reproductive coercion, in addition to the overall status of reproductive rights, in order to reflect the lived experiences of people around the world. The erasure and reorganization of the 2024 Human Rights Reports is a blatant rejection of the basic principle that reproductive rights are human rights.

The Center for Reproductive Rights (“Center”) seeks to better understand the Trump Administration’s decision to remove topics related to reproductive rights from the 2024 Human Rights Reports. Releasing this information is vital to the public interest to understand the state of reproductive rights around the world as well as the Trump Administration’s policy agenda regarding global reproductive rights.

## **Records Requested**

Please provide all responsive records from September 1, 2024, through the date this search is conducted (unless otherwise specified). As used herein, “records” means all records as defined in 22 C.F.R. § 171.1(b). Additionally, as used herein, any reference to the State Department encompasses all field offices (both current and past), Foreign Service posts abroad, as well as the central offices located in Washington, D.C. 22 C.F.R. § 171.1(b)(2). Please note that “communications” requested include, but are not limited to, e-mails, messaging platforms (including, but not limited to Signal, Slack, GChat or Google Hangouts, Lync, Skype, X (formerly Twitter) direct messages, Facebook messages, Truth Social messages, WhatsApp, Telegram, or Parler), and communications and relevant materials that may have been distributed via personal phones or devices. For ease of search, we have included e-mail addresses for individuals whose e-mail addresses are publicly available—lack of e-mail address availability should not hinder the agency’s ability to conduct searches based on individual names or keywords.

We request the following records within twenty business days:

1. All versions, drafts, copies, or modifications of the State Department’s 2024 *Country Reports on Human Rights Practices*, in whole or in part, in existence and in the possession of any U.S. Department of State employee, agent or contractor.
2. All versions, drafts, copies, or modifications of the State Department’s 2024 *Country Reports on Human Rights Practices* sent between the Department’s Bureau of Democracy, Human Rights, and Labor and the Department’s Office of the Secretary.
3. All communications, including instructions, and/or any attachments to communications, that refer or pertain to the 2024 *Country Reports on Human Rights Practices*, including the removal of the “Reproductive Rights” subsection, between the Department’s Office of the Secretary and/or the Department’s Bureau of Democracy, Human Rights, and Labor and any overseas Missions.

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<sup>2</sup> 2024 *Country Reports on Human Rights Practices*, U.S. DEP’T OF STATE, Aug. 12, 2025, <https://www.state.gov/reports/2024-country-reports-on-human-rights-practices>.

4. All communications, including instructions, and/or any attachments to communications, which refer or pertain to the 2024 *Country Reports on Human Rights Practices* sent or received by the following offices:
  - a. the Department's Office of the Secretary, including any individual employees, agents or contractors acting on behalf of the Office of the Secretary;
  - b. the Bureau of Democracy, Human Rights, and Labor, including any individual employees, agents or contractors acting on behalf of the Bureau of Democracy, Human Rights, and Labor.
5. All communications, and/or any attachments to communications, which contain the terms "abortion," "contraception," "reproductive," or "repro," sent or received by the following offices:
  - a. the Department's Office of the Secretary, including any individual employees, agents or contractors acting on behalf of the Office of the Secretary;
  - b. the Bureau of Democracy, Human Rights, and Labor, including any individual employees, agents or contractors acting on behalf of the Bureau of Democracy, Human Rights, and Labor.
6. All calendar entries and invitations, all attachments to any calendar entries and invitations, and all meeting records, including, but not limited to, meeting notes and agendas, which refer or pertain to the 2024 *Country Reports on Human Rights Practices*.

The Center seeks all responsive records regardless of format, medium, or physical characteristics. In conducting your search, please understand the terms "record," "document," and "information" in their broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs, as well as letters, emails, facsimiles, telephone messages, voice mail messages and transcripts, notes, or minutes of any meetings, telephone conversations or discussions. Our request includes any attachments to these records. No category of material should be omitted from search, collection, and production.

In addition to the records requested above, the Center also requests records describing the processing of this request, including records sufficient to identify search terms used, locations and custodians searched, and any tracking sheets used to track the processing of this request. If your agency uses FOIA questionnaires or certifications completed by individual custodians or components to determine whether they possess responsive materials or to describe how they conducted searches, we also request any such records prepared in connection with the processing of this request.

Please search all records regarding agency business. You may not exclude searches of files or emails in the personal custody of your officials, such as personal email accounts or text messages. Records of official business conducted using unofficial systems or stored outside of official files are subject to the Federal Records Act and FOIA. It is not adequate to rely on policies and procedures that require officials to move such information to official systems within a certain period of time; the Center has a right to records contained in those files even if material

has not yet been moved to official systems or if officials have, through negligence or willfulness, failed to meet their obligations.

Please note that in conducting a “reasonable search” as required by law, you must employ the most up-to-date technologies and tools available, in addition to searches by individual custodians likely to have responsive information. Recent technology may have rendered your agency’s prior FOIA practices unreasonable. In light of the government-wide requirements to manage information electronically by the end of 2016, it is no longer reasonable to rely exclusively on custodian-driven searches. Furthermore, agencies, including the State Department, which have adopted the National Archives and Records Agency Capstone program, or similar policies, now maintain emails in a form that is reasonably likely to be more complete than individual custodians’ files. For example, a custodian may have deleted a responsive email from his or her email program, but your agency’s archiving tools would capture that email under Capstone.

Accordingly, the Center requests that the State Department use the most up-to-date technologies to search for responsive information and take steps to ensure that the most complete repositories of information are searched. The Center is available to work with you to craft appropriate search terms. However, custodian searches are still required; agencies may not have direct access to files stored in .PST files, outside of network drives, in paper format, or in personal email accounts.

We request that you produce all responsive materials in their entirety; however, should you determine the materials contain information which falls within the statutory exemptions provided in 5 U.S.C. § 552 or 22 C.F.R. § 171.11, we request the information be reviewed for possible discretionary disclosure. We furthermore request that all reasonably segregable portions of the exempt material be provided. We request that any deleted material be described in detail, and that you specify the statutory basis for the denial as well as your reasons for believing that the alleged statutory justification applies in this instance. Please separately state your reasons for not invoking your discretionary powers to release the requested documents in the public interest. Such statements will be helpful in deciding whether to appeal an adverse determination.

Under the FOIA Improvement Act of 2016, agencies must adopt a presumption of disclosure, withholding information “only if . . . disclosure would harm an interest protected by an exemption” or “disclosure is prohibited by law.” If it is your position that any portion of the requested records is exempt from disclosure, the Center requests that you provide an index of those documents as required under *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973), *cert. denied*, 415 U.S. 977 (1974). As you are aware, a *Vaughn* index must describe each document claimed as exempt with sufficient specificity “to permit a reasoned judgment as to whether the material is actually exempt under FOIA.”<sup>3</sup> Moreover, the *Vaughn* index “must describe each document or portion thereof withheld, and for each withholding it must discuss the consequences of disclosing the sought-after information.”<sup>4</sup> Further, “the withholding agency must supply ‘a relatively detailed justification, specifically identifying the reasons why a particular exemption is relevant

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<sup>3</sup> *Founding Church of Scientology of Washington, D.C. v. Bell*, 603 F.2d 945, 949 (D.C. Cir. 1979).

<sup>4</sup> *King v. U.S. Dep’t of Just.*, 830 F.2d 210, 223-24 (D.C. Cir. 1987).

and correlating those claims with the particular part of a withheld document to which they apply.”<sup>5</sup>

You should institute a preservation hold on information responsive to this request. The Center intends to pursue all legal avenues to enforce its right of access under FOIA, including litigation if necessary. Accordingly, your agency is on notice that litigation is reasonably foreseeable.

To ensure that this request is properly construed, that searches are conducted in an adequate but efficient manner, and that extraneous costs are not incurred, the Center welcomes an opportunity to discuss its request with you before you undertake your search or incur search or duplication costs. By working together at the outset, the Center and your agency can decrease the likelihood of costly and time-consuming litigation in the future.

### **Waiver or Limitation of Fees**

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii), documents are required to be provided to requesters without any charge or at reduced fees “if disclosure of the information 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 the commercial interest of the requester.” We request a waiver (or, in the alternative, a reduction) of all fees because disclosure of the information would be in the public interest by ensuring the public understands what was removed from the 2024 Human Rights Reports and why that information was removed.

Founded in 1992, the Center is the only global legal advocacy organization dedicated to reproductive rights, and its litigation and advocacy has played a key role in expanding access to reproductive health care around the world. The Center uses information gathered, and its analysis of information gathered, to educate the public through reports, briefing papers, fact sheets, periodicals, articles, blog posts, and other educational materials. Likewise, the Center also makes the materials gathered available on its public website and promotes their availability on social media platforms, such as Facebook, X (formerly known as Twitter), and Instagram. The Center receives hundreds of thousands of website page views, monthly, and publishes newsletters for public dissemination. Thus, the Center has demonstrated commitment to the public disclosure of documents and creation of editorial content.

The Center does not make this request for commercial use. 45 C.F.R. § 5.54(b)(3). As a 501(c)(3) nonprofit organization, the Center does not have a commercial purpose and the release of the information requested is not in the organization’s financial interest. Accordingly, the Center qualifies for a fee waiver.

In the event that you determine you are unable to waive the fees, please provide us with prior notice if the total fees authorized will exceed \$200 so that we can discuss arrangements.

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<sup>5</sup> *Id.* at 224.

## Conclusion

The Center looks forward to working with your agency on this request. Thank you for your prompt attention to this matter.

With respect to the form of production, *see* 5 U.S.C. § 552(a)(3)(B), the Center requests that responsive materials be provided electronically by email or in PDF or TIF format on a USB drive. Please send any responsive material being provided and acknowledgement of receipt of this request to:

Manasi Raveendran  
c/o Julia Long  
Center for Reproductive Rights  
1600 K Street, NW, 7<sup>th</sup> Floor  
Washington, DC 20006  
Phone: (202) 524-5536  
Email: MRaveendran@reprorights.org

If it will accelerate release of responsive records, please also provide responsive material on a rolling basis.

If you do not understand any part of this request, have any questions, or foresee any problems in fully releasing the requested records, please contact Manasi Raveendran at (202) 524-5536 if you have any questions. Thank you for your assistance.

Sincerely,

Manasi Raveendran