

**ANNUAL FOIA REPORT
SUMMARY OF CERTAIN DATA AND COMPARISON WITH PRIOR YEARS**

FOIA REQUESTS	FY25	FY24	FY23	FY22	FY21
Requests Received in FY	13254	10811	9481	10000	12363
Requests Processed in FY	13249	10985	9022	9856	12171
Requests Pending at end of FY	1267	1262	1436	977	833
FOIA APPEALS					
Appeals Received in FY	863	598	632	611	647
Appeals Processed in FY	859	597	631	612	645
Appeals Pending at end of FY	8	4	3	2	3
PERSONNEL & COST DATA					
Number of FTE in FOIA Office	27	29	27	25	26
Total of FOIA Liaison FTE	9.19	8.22	8.9	7.17	7.30
Total FOIA Staff	36.19	37.22	35.9	32.17	33.3
Processing Costs	\$13,184,027	\$13,277,679	\$12,467,072	\$7,177,875	\$9,273,658
Litigation – Related Costs	\$1,056,768	\$841,947	\$794,083	\$317,456	\$199,884
Total FOIA Costs	\$14,240,795	\$14,119,626	\$13,261,155	\$7,495,331	\$9,473,542
FOIA Fees Collected	\$0	\$311	\$658	\$5,201	\$7,711
Percentage of Total FOIA Costs	0%	0.0001%	.01%	.07%	.08%
AVERAGE PROCESSING TIME - DAYS					
Simple requests	5.86	5.86	5.9	7.78	16.23
Complex requests	47.42	71.27	62.25	73	697

**ANNUAL FOIA REPORT
BREAKDOWN OF WORKLOAD VOLUME BY REQUESTOR TYPE FOR FY 25**

FOIA REQUESTS BY CATEGORY OF REQUESTOR	FY25 Requests Rec'd	% of total requests rec'd	
Commercial	5,240	40%	
News Media	3,126	24%	
Educational	1,901	14%	
Government	29	<1%	
Other	2,958	22%	
Total Requests Received	13,254	100%	
Breakdown of Commercial Requestors		% of All requests rec'd	Type of records requested
Other commercial entities	3,099	59%	Attorneys representing clients; small scale due diligence, small scale confidential exhibits
Check Fund Manager LLC	859	16%	Due diligence on broker dealers, investment advisors, and firms and corporate background checks
RoyaltyRange/RoyaltyStat	569	11%	Confidential exhibits to registration related filings
Clarivate Analytics	388	8%	Confidential exhibits to registration related filings
AUS Consultants	262	5%	Confidential exhibits to registration related filings
ktMINE	63	1%	Confidential exhibits to registration related filings
Total Commercial requests	5,240	40%	
Breakdown of Media Requestors	Number of Requests Filed	% of All requests rec'd	
SECProbes.com (John Gavin)	2,646	85%	Records on ENF matters
Other media entities	480	15%	Variety of subject matters
Total media requests	3,126	24%	

TEN OLDEST PENDING FOIA REQUESTS and APPEALS at END OF FY 25
As noted in Sections VI.C.(5) and VII.E. of the Annual Report

Oldest	FOIA Number	Received Date	Subject	Current Status
1	17-00013-FIFO	7/7/2017	In the Matter of Certain Trading in Threshold Securities. (NY-7729)	In Process
2	18-00013-FIFO	6/27/2018	any investigative materials related to Gray's work in New Haven. Information concerning Larry Gray (18-01346-FOIA), and Gray Financial Group, Inc. (18-01347-FOIA)	In Process
3	19-00011-FIFO	7/17/2019	Records from September 2007 to the present concerning Trading in Threshold Securities, to include depositions, testimony, discovery and other documents.	On Hold
4	19-00012-FIFO	8/7/2019	All records that mention or reference the WikiLeaks website or organization from January 2006 to the present, to include emails, memos, notes, briefings, and reports.	On Hold
5	20-00005-FIFO	12/18/2019	All Commission records regarding the deceased foreign national Adnan Khashoggi.	On Hold
6	20-00011-FIFO	5/27/2020	Any e-mails or memoranda to or from SEC Commissioners containing the terms 'Saudi' or 'PIF' or 'sovereign'" between January 1, 2018 and the present.	On Hold
7	21-00002-FIFO	3/29/2021	Emails to SEC - Keyword -"the Calibra digital wallet."	In Process
8	21-00003-FIFO	3/29/2021	The Libra Association.	On Hold
9	21-00014-FIFO	4/8/2021	Email, in the email accounts of each person in the SEC's Office of Legislative and Intergovernmental Affairs, which contains ANY of the following words: CAPITAL, CAPITOL, POLICE, ATTACK, MOB, VIOLENCE, or TRUMP. I limit this request to emails on January 6th and January 7th, 2021. Please include TO, FROM and CC emails.	In Process
10	21-00007-FIFO	05/03/2021	any and all information related to myself, J. Carlo Cannell, or my firm, Cannell Capital LLC	On Hold
Oldest	APPEAL Number	Received Date	Subject	Date request sent to OGC
1	25-00838-APPS	09/18/2025	all reports SEC has submitted to the Office of Management and Budget as required by President Trump's February 19, 2025 executive order titled, "Ensuring Lawful Governance and Implementing the President's 'Department of Government Efficiency' Deregulatory Initiative," including, but not limited to, lists of all regulations identified under Sec. 2(a) of the executive order	9/19/2025
2	25-00861-APPS	9/22/2025	FOIA Requests Consolidation - Objection to Administrative Closure (25-00355-FOIA, 25-04214-FOIA, 25-04335-FOIA, 25-04343-FOIA, 25-00454-FOIA)	11/17/2025
3	25-00858-APPS	9/22/2025	University Of Clervrain Law Schools, Inc	9/30/2025
4	25-00847-APPS	9/24/2025	all records relating to communications from May of 2017 through December of 2020 between Amy Starr and any personnel from JP Morgan, including calendar entries,	9/28/2025

			notes, or emails between Ms. Starr and any email address from the domain "@jpmorgan.com"	
5	25-00851-APPS	9/26/2025	all guidance, policies, memoranda, or directives created by the SEC to implement the April 9, 2025 "Directing the Repeal of Unlawful Regulations" presidential memorandum, including, but not limited to, records created to effectuate the repeal of any rule or regulation pursuant to Executive Order 14219 from, February 19, 2025, until the date of the search	9/28/2025
6	25-00863-APPS	9/26/2025	Consolidated Appeals For Controversies	11/17/2025
7	25-00860-APPS	9/30/2025	Ernst & Young reports to the Commission referenced in Order Instituting Public Administrative and Cease-and-Desist Proceedings	11/17/2025
8	25-00859-APPS	9/30/2025	Fortinet, Inc	9/30/2025