Majority's Analysis of the Minority's
Summary of Documents Substantiating Erez Reuveni's Whistleblower Disclosure
July 15, 2025

Note: In this document, the black text is copied from the Minority's original document. The red text is the Majority's responsive analysis.

Reuveni, formerly the Acting Deputy Director for the Office of Immigration Litigation (OIL) of the Department of Justice (DOJ), provided documents to the Ranking Member as an addendum to his June 24 protected disclosure.

The texts, emails, and other documents demonstrate Reuveni's unsuccessful attempts to secure government compliance with court orders in three separate cases: 1) *J.G.G. v. Trump* (lawsuit challenging the removal of Venezuelan nationals believed to be members of Tren de Aragua, pursuant to the Alien Enemies Act (AEA)); 2) Kilmar Abrego Garcia's case (a Salvadoran national and Maryland resident deported to El Salvador despite a grant of withholding of removal barring his return to El Salvador); and 3) *DVD v. DHS* (lawsuit challenging the removal of noncitizens to a third country, or a country not identified in their removal order, without an assessment of claims under the Convention Against Torture). The evidence shows the futility of Reuveni's efforts and his growing realization through correspondence with other departments that Trump Administration officials, including DOJ leadership, did not plan to comply with court orders.

Batch 1 is referenced below as B1; Batch 2 is B2. Page numbers correspond to the actual pdf pages. The chart at the beginning of each batch was provided by Reuveni's counsel as part of the disclosure.

Majority Analysis Overview: The summary offered by the Minority grossly mischaracterizes the documents it purports to summarize. Very little of the material even mentions Bove, let alone implicates him in any wrongdoing. In fact, one of the only times Bove is mentioned is in an email between Reuveni and another DOJ official regarding legal strategy, a discussion well within the scope of his job duties and responsibilities. More generally, most of the emails reflect internal legal debate about how to interpret and apply court orders—something that would not occur if officials intended to ignore them. The suggestion that legal analysis about the scope of a court order amounts to misconduct is unfounded. Even the more inflammatory claims rest on ambiguous text messages taken out of context with no names, incomplete or missing timestamps, or otherwise lacking any verification of authorship. Concerningly, the Minority's summaries repeatedly recast routine legal arguments as evidence of misconduct, when in fact these were the Government's official litigation positions, some of which ultimately prevailed, including before the Supreme Court.

The below red annotations reflect the Majority's responses to the Minority's summaries and interpretations of the underlying documents possessed to date. Based on the file names assigned to the produced documents, it appears the documents were provided to the Ranking Member on July 1 and July 7 as an addendum to the June 24 protected disclosure. **The Majority did not receive the documents until July 10. The Majority respects whistleblowers and the whistleblowing process and have addressed the untimely production with the whistleblower's attorneys.**

Bove's "f you" statement.***

- The disclosed documents support allegations that Principal Associate Deputy Attorney General Emil Bove stated in a March 14 meeting with senior DOJ officials that the Department would need to consider telling the courts "f*** you" and ignore any order to enjoin the removal of individuals pursuant to the AEA. Text exchanges between Mr. Reuveni and his supervisor, August Flentje—both of whom were present at the March 14 meeting—reference the "f*** you" comment when it became clear they could not confirm whether individuals subject to AEA were on a flight to El Salvador in violation of a court order. [B1, p.6]

Analysis: The purported text does not include Bove, does not reference Bove, does not reference a March 14 meeting, and is completely devoid of context.

More importantly, the Minority's assertion is unfounded. On March 14, 2025, **there were no cases filed regarding AEA removals, let alone any court orders issued to enjoin removal actions.** Any discussion about court orders necessarily would have fallen within the context of anticipating **future** litigation.

At his hearing, under oath, Bove firmly stated, "I have never advised a Department of Justice attorney to violate a court order." The Deputy Attorney General issued a statement confirming that he also attended the meeting, and "at no time did anyone suggest a court order should not be followed." In another statement, the Attorney General unequivocally clarified that "no one was ever asked to defy a court order." **These statements are consistent with Reuveni's own whistleblower disclosure. According to page 7 of the disclosure: "Mr. Reuveni left the meeting understanding that DOJ would tell DHS to follow all court orders."**[1]

Recent public reporting also supports Bove's sworn testimony, and undercuts the Minority's characterization. In an April 8th letter addressed to the Justice Department's Human Resources Division, August Flentje—Reuveni's former supervisor and the **other party to the cited text exchange**, stated: "The Principal Associate Deputy Attorney General [Bove] advised our team that we must **avoid** a court order halting an upcoming operation to implement the Act at all costs."[2] In the same letter, Flentje describes the meeting as one in which "we were advised by ODAG to do whatever **we could properly do** to avoid hampering the AEA enforcement effort."[3] These statements were made under penalty of perjury months before Reuveni made the claims in his whistleblower disclosure, and directly contradict his assertions. Bove telling subordinate DOJ litigators, in advance of **anticipated** litigation, to **avoid** a court order that negatively impacts a mission is inconsistent with instructions to outright **ignore** a court order, and **entirely consistent** with Bove's sworn testimony.

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[1] GOV'T ACCOUNTABILITY PROJ., *Protected Whistleblower Disclosure of Erez Reuveni*, at 7 (June 24, 2025), https://www.judiciary.senate.gov/imo/media/doc/06-24-2025_-_Protected_Whistleblower_Disclosure_of_Erez_Reuveni_Redacted.pdf.

[2] Shawn Fleetwood, *New Docs Shatter Leftist Claims Emil Bove Ordered Former DOJ Official To 'Defy' Court Orders*, THE FEDERALIST (July 11, 2025), https://thefederalist.com/2025/07/11/new-docs-shatter-leftist-claims-emil-bove-ordered-former-doj-official-to-defy-court-orders/ (emphasis added).

[3] *Id. (*emphasis added*)*.

- Other text exchanges with colleagues also reference Bove's "f*** you" statement. [B1, p.33; B2 pp.8-10]

Analysis: This characterization of the cited text messages attempts to conflate every passing use of the term "f***" with an alleged specific utterance of the phrase "f*** you" by a person (who is not named) on a prior occasion (which is not referenced). The B2 p.8 exchange is clearly a reference to the common slang expression "f*** around, find out."

Alien Enemies Act Litigation.

- Numerous emails confirm Mr. Reuveni's attempts to obtain reassurances from his DHS, State, and DOJ colleagues that no one subject to the AEA in government custody would be removed in violation of the injunction in *J.G.G. v. Trump*. Mr. Reuveni continued to request information about three flights, including two in the air when Judge Boasberg issued his oral order, to no avail. [B1, pp.14-31]

Analysis: None of these emails include, copy, or reference Bove. The cited emails consist largely of rapid-fire updates from Reuveni sent minutes apart, several of which were mere updates that did not require a response, and none of which demonstrate misconduct by others. [B1, pp.14–31]

At most, these emails show Reuveni's colleagues were managing a complex, fast-moving situation in real time. [B1, pp.14–31] Critically, after these emails were sent, **Reuveni signed a brief on behalf of the United States affirming that the Government had complied with the court's orders throughout the *J.G.G.* litigation.**[4] Any suggestion of Government wrongdoing on behalf of Bove—who was **not** included on these email chains—or other Government attorneys related to alleged violations of the court's orders in *J.G.G.*, now stands in direct conflict with a federal court filing Reuveni personally signed and submitted to the court.

- Emails indicate the government adopted the position that deplaning flights that left U.S. airspace prior to the court's order enjoining AEA removals was lawful. [B1, pp.14-31]

Analysis: This legal position is consistent with the argument the Government advanced in federal court—and one that Reuveni himself signed onto in a formal brief.[5] In the *J.G.G.* case, Reuveni argued that "the government complied with the Court's temporary restraining order" with respect to "any flights that were already outside U.S. territory and airspace," because passengers aboard those flights had already been "removed" under the Alien Enemies Act and thus fell outside the order's reach.[6] The brief further asserted that "[t]he government did not violate [the court's] injunction," and concluded that "[o]nce the terrorists had been removed from the United States, any decision by the President to take such actions pursuant to independent constitutional authority is therefore not a violation of the Court's orders in all events."[7] It is misleading to suggest that the Government's position was improper when Reuveni himself advanced the same legal arguments in court, asserting

[4] *See J.G.G. v. Trump*, No. 1:25-cv-00766, Doc. No. 58 at 4, 13 (D.D.C. Mar. 25, 2025).

[5] *J.G.G. v. Trump*, No. 1:25-cv-00766, Doc. No. 24 at 6 (D.D.C. Mar. 17, 2025).

[6] *Id.* at 1, 3.

[7] *Id.* at 3, 5.

that the Government's actions were lawful and consistent with the court's orders.[8]

- One email clearly describes Bove's role in advising DHS that deplaning flights that left U.S. airspace prior to the court's minute order docketing was lawful. [B1, p.31]

Analysis: It is entirely unremarkable that Bove, as Principal Associate Deputy Attorney General, would restate the Government's litigation position. [B1, p.31] As explained above, Reuveni himself signed[9] a brief advancing the same legal position—that "an oral directive is not enforceable as an injunction,"[10] and argued that once flights had departed U.S. territory and airspace, they were already "removed' within the meaning of the Alien Enemies Act and the Court's order and therefore were not covered by the order.[11] Having personally advanced this position on behalf of the Government, Reuveni cannot now credibly suggest that articulating this legal argument amounts to misconduct. Nothing in the cited email reflects any wrongdoing by Bove—or by Reuveni—in merely describing the Government's view on the retroactive applicability of the court's minute entry to flights that had already departed. [B1, p.31]

- Texts support Mr. Reuveni's statement that DOJ lied to the court in a hearing on March 15 in *J.G.G. v. Trump* when DOJ official Drew Ensign stated that he did not know whether AEA removals would take place "in the next 24 or 48 hours." The messages indicate shock and surprise that DOJ would take that position when Mr. Ensign knew there were plans for AEA removals within the next 24 hours. [B2, pp.8-9].

Analysis: None of these texts include, copy, or reference Bove. Further, this claim is speculative and unsubstantiated. The cited text messages do not show Ensign knew AEA removals would occur within the next 24 hours—only that others, after the fact, thought that he knew of planned removals. [B2, pp. 8–9] These messages do not include a statement from Ensign himself indicating he had contrary knowledge at the time of the hearing. The emails we reviewed also add additional context to a statement in Reuveni's disclosure saying that "Mr. Reuveni reasonably believes Ensign's statement to the court that he did not know whether AEA removals would take place 'in the next 24 or 48 hours' was false." The text messages that Reuveni provided state "I mean he doesn't know for sure they're [sic] aea [sic]." Meaning Reuveni himself raised a question on the level of knowledge Ensign had as to whether and when AEA removals would take place. [B2, p.8]

Moreover, Reuveni's allegations of wrongdoing are directly rebutted by three briefs he signed and submitted to the court **after** the March 15, 2025 hearing defending the Government's actions[12] and compliance with the court's orders in the *J.G.G.* case.[13] For Reuveni to now suggest that the Government misled the court or defied the court's orders is flatly contradicted by the very filings

[8] *Id.* at 6.

[9] *Id.*

[10] *Id.* at 2.

[11] *Id.* at 3.

[12] *See J.G.G. v. Trump*, No. 25-5067, Doc. No. 1208720413 at 3, 15 (D.C. Cir. Mar. 15, 2025); *see also J.G.G. v. Trump*, No. 25-5068, Doc. No. 1208720435 at 3, 23 (D.C. Cir. Mar. 16, 2025).

[13] *See J.G.G. v. Trump*, No. 1:25-cv-00766, Doc. No. 58 at 13 (D.D.C. Mar. 25, 2025).

Reuveni personally signed **after** the March 15, 2025 hearing.[14] If Reuveni genuinely believed the Government had misled the court, his ethical duty of candor would have required him to disclose that information to the court. He did not raise any such concerns in any of the subsequent filings in this case. At most, these text messages reflect internal disagreement and second-hand impression amid fast-moving events—but do **not** establish any deliberate effort to deceive a federal judge.

Kilmar Abrego Garcia

- With respect to the removal of Abrego Garcia, the disclosed documents reveal extreme confusion amongst officials at DHS, State, and DOJ regarding how to manage Mr. Garcia's mistaken removal. Officials discussed various options, including 1) approaching El Salvador to release him; 2) reaching out to El Salvador to ensure Mr. Garcia's safety; 3) and arguing nothing could be done because Mr. Garcia was in another country's custody. [B1, pp.35-36]

Analysis: None of these mischaracterized emails include, copy, or reference Bove. The three "options" apparently being "discussed" are simply proposed by Reuveni himself in a single email. [B1, p.36] The cited emails are authored by only two communicants: Reuveni himself and a single response from one other individual. Accordingly, these emails do not—nor could they—"reveal extreme confusion amongst officials at [three agencies]" as purported in the Minority's summary.

- Mr. Reuveni repeatedly reached out to senior Administration officials to ask if, in briefing to the court, he could state the government would correct the "error" of Mr. Garcia's deportation and discussed the legal consequences if he was not returned. [B1, pp.36-40]

Analysis: None of the emails include, reference, or copy Bove. Reuveni does not "repeatedly" ask about whether the Government would "correct the 'error'" of Garcia's deportation as purported in in the Minority's above summary. Rather, in **one** email Reuveni asks: "What is the status of the declaration. And can we say in the brief that we are taking steps to correct the error or no. Filing deadline is in 1.5 hrs." [B1, p.36]

- Email exchanges show DHS's attempts to falsely label Mr. Garcia a MS-13 leader and downplay the Department's mistake in removing him to El Salvador. [B1, pp.38-42, 50- 55]

Analysis: This is a gross mischaracterization of the emails cited—none of which include, reference, or copy Bove. The exchanges do not show "attempts to falsely label Mr. Garcia" as anything. Rather, they reflect internal deliberations regarding the outline of a declaration. The initial communicant lays out 5 points, one of which was a generalized statement that "This guy is a leader of MS-13," [B1, p. 42] which is subsequently corrected / narrowed to say that he is a "verified member" of MS-13 (instead of a leader). [B1, p. 38] Indeed, **the fact that Garcia was a "verified member" of MS-13 is substantiated by the prior factual findings of two separate immigration courts.**[15]

Additionally, nothing in the emails cited attempts to "downplay" any mistake in Garcia's deportation

[14] *See id.*

[15] *See Garcia v. Noem*, No. 8:25-CV-00951, Doc. No. 11-1 at 2-3 (D. Md. Mar. 31, 2025) (Copy of the IJ Bond Memorandum, appended as Ex. A to the Government's Response Brief); *id.*, Doc. No. 11-2 at 2 (Copy of the Dismissal from the Board of Immigration Appeals, appended as Ex. B to the Government's Response Brief).

as claimed by the Minority's summary. Rather, the emails cited discuss additional evidence regarding Garcia's "MS-13 affiliation," [B1, p.50] which included (in addition to the immigration court findings discussed above) an "investigative report" on the traffic stop of Garcia in Tennessee related to suspicions of human-trafficking [B1, p.54] and a separate "Gang Sheet" from law enforcement in Prince George's County, Maryland, which concluded that "Garcia was validated as a member of the Mara Salvatrucha (MS13) Gang." [B1, p.53]

Notably, on May 21, 2025, a Tennessee grand jury indicted Garcia for a number of crimes; the indictment specified that he was "a member and associate of the transnational criminal organization, La Mara Salvatrucha, otherwise known and hereinafter referred to as MS-13."[16]

- The emails provide evidence of DHS's desire to make unsupported statements that Mr. Garcia would be safe while detained at CECOT but also show that officials could not make assurances that Mr. Garcia could be protected there. [B1, pp.48-62]

Analysis: This is a gross mischaracterization of the emails cited—none of which include, reference, or copy Bove. The emails cited [B1, pp.48-62] discuss: (1) evidence that Garcia was a member of MS-13; (2) the need to keep him separated from members of the rival Barrio-18 gang: and (3) how to convey this information to El Salvador to effectuate separation of the rival gang members. Indeed, that was the whole point; Garcia's known affiliation and membership with MS-13—a designated foreign terrorist organization—was the reason for his deportation in the first instance.

- State and DHS officials stated in email exchanges that Mr. Garcia should be brought back to the United States and that the U.S. government should ensure his safety until that happens. Simultaneously, DHS discussed the need to revoke his withholding of removal while admitting there was no formal process for taking this step. [B1, pp.66-77]

Analysis: None of these emails include, copy, or reference Bove. [B1, pp. 66–77] The emails merely reflect entirely unsurprising internal deliberation by people other than Bove about possible options in response to actively evolving litigation. The emails also do not establish that the State Department and/or DHS believed that Garcia "should" be brought back, only that they were exploring return options. [B1, pp. 75, 77]

Third Country Removals.

- Emails also disclose concern amongst DOJ officials that notice of the terms of the nationwide injunction in *DVD v. DHS* was not properly circulated to agencies to effectively effectuate the injunction, per the typical practice. [B1, pp.81-82]

- Emails show DOJ was unable to respond to *DVD* counsels' questions regarding public reporting of the removal of individuals with final orders of removal to third countries, an action that would violate the court order in *DVD*. [B2, pp.43-44]

- Emails show heated exchanges between DHS and DOJ debating how to characterize the injunction in *DVD*. DOJ attorneys expressed disbelief that DHS was taking the position that the injunction applied only to named plaintiffs and was not universal in scope. DHS stated

[16] *United States v. Garcia*, No. 3:25-CR-00115, Doc. No. 3 at 2 ¶ 5 (M.D. Tenn. May 21, 2025).

that they had received conflicting advice from DOJ. [B2, pp.12, 37-41]

- The disclosure also shows Mr. Reuveni's attempts to determine whether DHS was planning to remove any individual with a final removal order other than an expedited removal order and ended with him conceding that without confirmation from DHS and DOJ, he could not file a brief stating the injunction applied to all removals. [B2, pp.14-25]

- Texts provided evidence that DHS was delaying disseminating written guidance to the agency about the applicability of the *DVD* injunction at the behest of DOJ leadership and that written guidance was not distributed, but that DHS was providing *verbal* guidance. [B2, pp.33-35]

- Emails provided additional evidence that DHS disregarded its responsibility to comply with the injunction in *DVD*. A DOJ attorney stated that she spoke to an ICE attorney who knew nothing about the injunction until he found the *DVD* order while researching another case on Westlaw, and that he then reached out to his leadership who reached out to HQ and were told that ERO was not removing people to third countries. The attorney confirmed that no one at ERO had received information regarding the order barring third country removals. [B2, p.46]

Analysis: None of these emails or text messages include, copy, or reference Bove.

The cited excerpts use inconsistent numbering conventions—some of which align with neither the document pagination written in the bottom righthand corners of each page nor the PDF pagination. In the few instances where the citations align, the Minority's above summaries erroneously inject adverse inferences and/or speculation about intent that is not reasonably supported by the plain language of the excerpted messages themselves.

At most, the messages reflect internal deliberations across agencies about how to comply with the court's orders within the context of active litigation. Debate about how to comply with a court order is certainly inconsistent with an intention to disobey or outright ignore it.

For context, on March 28, 2025, the district court issued its first TRO requiring notice and an opportunity to be heard for individuals "subject to a final order of removal from the United States to a third country."[17] And, two days later, DHS enacted written guidance "to satisfy any potential due process concerns" for those individuals, which included both written notice and an opportunity to be heard "consistent with Congress's intent."[18] That guidance reflected a good-faith, top-down effort to comply with the court's order. Selectively excerpted conversations among subordinate federal employees—posed in the midst of navigating the complex landscape of numerous intra-agency stakeholders—does not call that reality into question.

Notably, although federal guidance instructed compliance, DOJ continued its appeals to challenge

[17] *D.V.D. v. U.S. Dep't of Homeland Sec.*, No. 1:25-10676, Doc. No. 34 at 1 (D. Mass. Mar. 28, 2025). (Temporary Restraining Order).

[18] *D.V.D. v. U.S. Dep't of Homeland Sec.*, No. 1:25-10676, Doc. No. 43 at 4 (D. Mass. Mar. 30, 2025) (Defendants' Motion for an Indicative Ruling Under Federal Rule of Civil Procedure 62.1); *id.*, Doc. No. 43-1 at 2 (Exhibit A - March 30, 2025 DHS Memorandum RE: Guidance Regarding Third Country Removals).

the jurisdictional basis of the court's ambiguous and grossly expansive injunctions.[19] In the end, the Government was vindicated in those challenges by the Supreme Court, which—not once[20] but twice[21]—ruled in the Government's favor and found the court's orders unlawful and its injunctions unenforceable.

Mr. Reuveni's removal from his position.

- A disclosed text exchange supports the conclusion that Mr. Reuveni was placed on administrative leave because he attempted to advise client agencies to follow a court order in the Abrego Garcia case. Mr. Flentje stated in a text that he believed there was a "through line" from the March 15 meeting with Mr. Bove where he [Mr. Flentje] stated he would not violate court orders and DOJ's decision to place Mr. Reuveni on administrative leave. [B1, p.85]

Analysis: Neither of these two text messages about an unidentified "certain meeting"—devoid of context and lacking verification of authorship—include or reference Bove. The personnel documents produced by Reuveni himself confirm that the decision to place Reuveni on leave and the ultimate termination decision were made and signed by Deputy Attorney General Blanche, not Bove. [B1, pp.88, 91] Blanche explained in his letter that Reuveni was being placed on leave for "failure to follow a directive from your superiors; failure to zealously advocate on behalf of the United States; and engaging in conduct prejudicial to your client." [B1, p.88]

These rationales are supported by the record. *First,* according to his own whistleblower disclosure, Reuveni **refused** to sign a brief making certain arguments on behalf of the United States regarding Garcia's gang membership. One of his stated reasons was that he could not make an argument "on appeal for the first time."[22] As an initial matter, exhibits previously filed in the case acknowledged evidence of Garcia's gang membership.[23] Moreover, courts of appeals have discretion to address issues raised on appeal for the first time.[24]

Second, Reuveni made statements in open court reflecting his advice to his "client" (the United States) and expressing displeasure that his supervisors disagreed with or did not take his advice. Specifically, on April 4th at a hearing in the *Garcia* case, Reuveni disclosed internal deliberations with his client and said, "the first thing I did was ask my clients that very question. I've not received, to date, an answer that I find satisfactory." In response to a question from the judge about returning

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[19] *See, e.g.*, *D.V.D. v. U.S. Dep't of Homeland Sec.*, No. 25-10676, Doc. No. 38 at 5 (D. Mass. Mar. 29, 2025) (Defendants' Motion for Partial Stay of the Temporary Restraining Order).

[20] *Dep't of Homeland Sec. v. D.V.D.*, 606 U.S. ___ (June 23, 2025) (granting stay), https://www.supremecourt.gov/opinions/24pdf/24a1153_l5gm.pdf.

[21] *Dep't of Homeland Sec. v. D.V.D.*, 606 U.S. ___ (July 3, 2025), https://www.supremecourt.gov/opinions/24pdf/24a1153_2co3.pdf.

[22] GOV'T ACCOUNTABILITY PROJ., *Protected Whistleblower Disclosure of Erez Reuveni*, at 25 (June 24, 2025), https://www.judiciary.senate.gov/imo/media/doc/06-24-2025_-_Protected_Whistleblower_Disclosure_of_Erez_Reuveni_Redacted.pdf.

[23] *See Garcia v. Noem*, No. 25-cv-00951, Doc. No. 11-1, 11-2, 11-3 (D. Md. Mar. 31, 2025).

[24] *Flynn v. Comm'r*, 269 F.3d 1064, 1069 (D.C. Cir. 2001) ("The rule is not absolute, and courts of appeals have discretion to address issues raised for the first time on appeal.").

Garcia, Reuveni later said: "That's my recommendation to my clients, but, of course, that's why that hasn't happened." Against this backdrop, an oblique reference to a "through line" leading to his dismissal does not obviate the evidence in the public record supporting the justifications articulated by Blanche.

Recent public reporting also undercuts the Minority's characterization. In an April 8th letter addressed to the Justice Department's Human Resources Division, August Flentje—Reuveni's former supervisor—said under penalty of perjury that some of the statements made by Reuveni at the April 4th hearing "reflects dissatisfaction with the client" and "is not appropriate in court." He also said that at least one of Reuveni's statements "likely reveals information regarding a privileged discussion, and should not be discussed in court."[25]

Moreover, this so-called "disclosed text exchange" consists of only two isolated messages, stripped of any surrounding context and lacking clear attribution—there is no confirmation of who authored either message or when they were sent. [B1, p.88] While the Minority's "Summary of Reuveni Documents" document claims these texts relate to an unknown "March 15 meeting," the "Reuveni Batch 1 Index and Evidence (corrected)" document describes the texts as linked to a "March 14 meeting"—presumably the very March 14, 2025 meeting that Reuveni explicitly acknowledged in his own disclosure as the one he departed from with the "understanding that DOJ would tell DHS to follow all court orders."[26] This admission squarely contradicts any claim that Reuveni was punished for advocating compliance with a court order and fundamentally undercuts the premise of his retaliation theory.

[25] Shawn Fleetwood, *New Docs Shatter Leftist Claims Emil Bove Ordered Former DOJ Official To 'Defy' Court Orders*, THE FEDERALIST (July 11, 2025), https://thefederalist.com/2025/07/11/new-docs-shatter-leftist-claims-emil-bove-ordered-former-doj-official-to-defy-court-orders/.

[26] GOV'T ACCOUNTABILITY PROJ., *Protected Whistleblower Disclosure of Erez Reuveni*, at 7 (June 24, 2025), https://www.judiciary.senate.gov/imo/media/doc/06-24-2025_-_Protected_Whistleblower_Disclosure_of_Erez_Reuveni_Redacted.pdf.