

VIA EMAIL

Email: FOIA-FNS@usda.gov; USDAFOIA@usda.gov

Kevin Lynch, FOIA Officer
Food and Nutrition Administration
U.S. Department of Agriculture
Braddock Metro Center II
1320 Braddock Place
Alexandria, VA 22314

Alexis Graves, Director
Office of Information Affairs
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Dear FOIA Officers,

This letter constitutes a request under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, and is submitted on behalf of the Electronic Privacy Information Center (“EPIC”) to the U.S. Department of Agriculture (“USDA”)’s Food and Nutrition Administration (“FNA”) (formerly Food and Nutrition Services) and Office of Information Affairs (“OIA”).

EPIC requests all records related to USDA’s communications and contracts with Palantir Technologies, Inc (“Palantir”) for the purpose of identifying, tracking, and addressing waste, fraud, and abuse under the Supplemental Nutrition Assistance Program (“SNAP”).

Documents Requested

EPIC seeks the following records created by or provided to USDA between January 20, 2025 and the time this request is processed:

- 1) All contracts, contract proposals, contract modifications, supplemental agreements, purchase card transaction worksheets, quotes, invoices, receipts, orders, and licenses:

- a) Relating to USDA's \$250,000 agreement with Palantir described as the "Supplemental Nutrition Assistance Program (SNAP) Fraud Identification and Case Workflow Platform Pilot Program" (Procurement Instrument Identifier 12314426F0120).¹
 - b) Relating to USDA's \$29.4 million agreement with Palantir described as the "Palantir Supplemental Nutrition Assistance Program (SNAP) Secure Network Starlight Platform in Support of USDA Food and Nutrition Administration" (Procurement Instrument Identifier 12314426F0217).²
 - c) Relating to any other planned or current collaborations between Palantir and USDA to combat waste, fraud, and abuse in the SNAP program or otherwise ensure SNAP program integrity as part of the Blanket Purchase Agreement with Procurement Instrument Identifier 12314426A0009.³
- 2) All emails, communications, and memoranda sent or received between the individuals identified in Appendix A of this request, and all emails, communications, and memoranda sent or received between Palantir representatives and the individuals identified in Appendix A of this request:
- a) Relating to or referencing one or more of the following topics:
 - i) Supplemental Nutrition Assistance Program (SNAP); SNAP benefits data; SNAP benefits waste; SNAP benefits fraud; SNAP benefits abuse; fraud identification; program integrity; foreign adversaries.
 - ii) The formation, workflow, operations, and analytical methods of the SNAP Program Integrity Data Team, including any communications related to the May 2026 preliminary report.⁴
 - iii) USDA's past or present efforts to collect SNAP eligibility data from states.
 - iv) USDA's \$250,000 agreement with Palantir described as the "Supplemental Nutrition Assistance Program (SNAP) Fraud Identification and Case Workflow Platform Pilot Program" (Procurement Instrument Identifier 12314426F0120).⁵
 - v) USDA's \$27.9 million agreement with Palantir described as the "Palantir Supplemental Nutrition Assistance Program (SNAP) Secure Network Starlight Platform in Support of USDA Food and Nutrition Administration" (Procurement Instrument Identifier 12314426F0217).⁶
- 3) Any studies, audits, research, reports, analyses, documents, and surveys:

¹ *Contract Summary*, USAspending.gov, https://www.usaspending.gov/award/CONT_AWD_12314426F0120_1205_12314426A0009_1205.

² *Contract Summary*, USAspending.gov, https://www.usaspending.gov/award/CONT_AWD_12314426F0217_1205_12314426A0009_1205.

³ *Contract Summary*, USAspending.gov, https://www.usaspending.gov/award/CONT_IDV_12314426A0009_1205.

⁴ *USDA SNAP Program Integrity Data Team: Preliminary Report*, U.S. Department of Agriculture (May 13, 2026), <https://www.fna.usda.gov/research/snap/program-integrity-data-preliminary>.

⁵ *Contract Summary*, USAspending.gov, https://www.usaspending.gov/award/CONT_AWD_12314426F0120_1205_12314426A0009_1205.

⁶ *Contract Summary*, USAspending.gov, https://www.usaspending.gov/award/CONT_AWD_12314426F0217_1205_12314426A0009_1205.

- a) Pertaining to Palantir’s ability to help identify or streamline the identification of SNAP benefits fraud, waste, or abuse; or pertaining to Palantir’s ability to otherwise support SNAP program integrity operations.

Please include all attachments and metadata (such as full email headers) for any emails shared.

Background

In 2025, the USDA launched the National Farm Security Action Plan (NFSAP) while declaring the prevention of waste, fraud, and abuse of American SNAP benefits a national security priority (alongside other food and agriculture issues).⁷

Since then, USDA has announced a number of contractual agreements with Palantir, including a \$300 million Blanket Purchase Agreement (BPA) that aims to carry out the NFSAP.⁸ Palantir’s press release states the partnership will enable USDA to “shield agricultural programs from fraud, abuse, and foreign adversary influence.”⁹ This agreement extends Palantir’s existing USDA collaborations and builds upon Palantir’s deployment of the Landmark platform to centralize US farmer data under the “One Farmer, One File” initiative.

The first publicly documented use of Palantir’s Landmark platform was to process online farmer sign-ups for the \$11 billion Farmer Bridge Assistance program during its digital rollout in February 2026.¹⁰ Palantir was then granted \$94,687,811 as a child award under the original \$300 million BPA to “centralize farm production & conservation IT systems, automate processes, and integrate data for better efficiency per the Landmark Platform initiative.”¹¹

“One Farmer, One File” was formally announced in March 2026, and is described by USDA as part of a “broad modernization effort” to unify digital systems across the Farm Service Agency (FSA), Natural Resources Conservation Service (NRCS) and Risk Management Agency (RMA).¹² The initiative's stated goal is to “create a single, streamlined record that follows the farmer — no matter where they go in the USDA system.”¹³ According to USDA, work began on “One Farmer, One File” in 2025, with planned completion in 2028.¹⁴ During Agriculture

⁷ *National Farm Security Action Plan*, U.S. Department of Agriculture 8 (2025), <https://www.usda.gov/sites/default/files/documents/farm-security-nat-sec.pdf>.

⁸ *USDA and Palantir Launch Partnership to Deliver Faster, Modernized Support for Farmers*, Palantir Investor Relations, (Apr. 22, 2026), <https://investors.palantir.com/news-details/2026/USDA-and-Palantir-Launch-Partnership-to-Deliver-Faster-Modernized-Support-for-Farmers/>.

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Contract Summary*, USAspending.gov, https://www.usaspending.gov/award/CONT_AWD_12314426F0126_1205_12314426A0009_1205.

¹² *USDA Launches ‘One Farmer, One File’ Initiative to Better Support Farmers*, Farm Service Agency, U.S. Department of Agriculture (Mar. 2, 2026), <https://www.fsa.usda.gov/news-events/news/03-02-2026/usda-launches-one-farmer-one-file-initiative-better-support-farmers>.

¹³ *Id.*

¹⁴ *Id.*

Secretary Brooke Rollins' speech announcing the initiative, she also claimed that the SNAP benefits system is "ripe with fraud."¹⁵

The limited source justification for the \$300 million BPA states that Palantir will provide services and capabilities "necessary to design and deploy fully interconnected digital environments supporting NFSAP implementation," thus fulfilling specific technical requirements including "real time and continuous compliance monitoring" and automated "risk or alert generation" for "detection of threats or anomalies."¹⁶

The \$300 million BPA functions as an indefinite delivery vehicle (IDV) for USDA to purchase subsequent goods or services from Palantir. Pursuant to this IDV, USDA granted a \$250,000 child award to Palantir which is briefly described as the Supplemental Nutrition Assistance Program (SNAP) Fraud Identification and Case Workflow Platform Pilot Program ("SNAP Fraud Identification Pilot Program").¹⁷ The award started on April 6, 2026 and concluded on June 18, 2026, with one contract modification filed on June 4, 2026 ("P00001").¹⁸ Shortly after this smaller award ended, a separate agreement began under the IDV, granting Palantir \$27.9 million for a contract described only as the Palantir Supplemental Nutrition Assistance Program (SNAP) Secure Network Starlight Platform in Support of USDA Food and Nutrition Administration ("Starlight Platform").¹⁹ This contract is slated to run from June 22, 2026 to June 21, 2027.²⁰

Very little information about the SNAP Fraud Identification Pilot Program and the Starlight Platform has been made publicly available, and it is unclear what implications they have for FNA's management of SNAP benefits data. The connections between Palantir's work on SNAP fraud identification efforts and Palantir's other USDA contracts (like building and deploying the Landmark platform) are similarly opaque.

The Supplemental Nutrition Assistance Program provides essential support to help low-income households buy groceries. SNAP is an essential part of the American social safety net: 42 million people used SNAP benefits in 2025 to feed themselves and their families.²¹ Overly

¹⁵ Jerry Hagstrom, *USDA to develop 'One Farmer, One File' with Palantir*, The Fence Post (Mar. 2, 2026), <https://www.thefencepost.com/news/usda-to-develop-one-farmer-one-file-with-palantir/>.

¹⁶ *Sole Source Justification for USDA NFSAP Implementation BPA*, SAM.gov, (Dec. 12, 2025), <https://sam.gov/workspace/contract/opp/eb30baf84ef6427a86c05fd0cee5499a/view>.

¹⁷ *Contract Summary*, USAspending.gov, https://www.usaspending.gov/award/CONT_AWD_12314426F0120_1205_12314426A0009_1205.

¹⁸ *Id.*

¹⁹ *Contract Summary*, USAspending.gov, https://www.usaspending.gov/award/CONT_AWD_12314426F0217_1205_12314426A0009_1205.

²⁰ *Id.*

²¹ *SNAP Data Tables*, Food and Nutrition Administration, U.S. Department of Agriculture, <https://www.fna.usda.gov/pd/supplemental-nutrition-assistance-program-snap>.

aggressive or inaccurate fraud detection methods risk cutting eligible beneficiaries off from a primary source of groceries that they would otherwise struggle to afford.

In 2025, USDA took the unprecedented step of demanding that state administrators share comprehensive state-held data about SNAP applicants and beneficiaries without clearly disclosing how that data would be used beyond ensuring “program integrity, including by verifying the eligibility of benefit recipients.”²² While many states refused, 29 states handed over sensitive personal information about SNAP households (including social security numbers and home addresses).²³ These aggressive data collection attempts are ongoing, as the Department of Justice is now suing states that withheld SNAP data.²⁴ USDA has since formed the SNAP Program Integrity Data Team and published a preliminary report based on SNAP data disclosed by compliant states in May 2026.²⁵ Against this backdrop, it is possible that Palantir’s recent SNAP-related USDA contracts are directly related to the agency’s continued efforts to seize SNAP beneficiary data from states and streamline investigations of SNAP fraud, waste, and abuse.

Palantir reported a 66% increase to all US government contract revenue in 2025.²⁶ American taxpayers deserve insight into the programs and technologies their tax dollars are funding, particularly when core privacy rights are implicated. It is imperative to the public interest that all relevant information about Palantir’s partnership with USDA on SNAP fraud detection be disclosed.

Request for Fee Waiver

A federal court has determined that EPIC is a “representative of the news media” for fee classification purposes.²⁷ As a representative of the news media, EPIC is entitled to receive the requested records with only duplication fees assessed.²⁸

²² Jude Joffe-Block & Stephen Fowler, *USDA, DOGE Demand States Hand Over Personal Data About Food Stamp Recipients*, NPR, (May 9, 2025), <https://www.npr.org/2025/05/09/nx-s1-5389952/usda-snap-doge-data-immigration>.

²³ *Id.*

²⁴ *Justice Department Sues States for Failing to Provide SNAP Data to the U.S. Department of Agriculture*, Office of Public Affairs, U.S. Department of Justice, (June 26, 2026), <https://www.justice.gov/opa/pr/justice-department-sues-states-failing-provide-snap-data-us-department-agriculture>.

²⁵ *USDA SNAP Program Integrity Data Team: Preliminary Report*, U.S. Department of Agriculture (May 13, 2026), <https://www.fna.usda.gov/research/snap/program-integrity-data-preliminary>.

²⁶ *Palantir Reports Q4 2025 U.S. Comm Revenue Growth of 137% Y/Y and Revenue Growth of 70% Y/Y; Issues FY 2026 Revenue Guidance of 61% Y/Y and U.S. Comm Revenue Guidance of 115% Y/Y, Crushing Consensus Expectations*, Palantir Investor Relations, (Feb. 2, 2026), <https://investors.palantir.com/news-details/2026/Palantir-Reports-Q4-2025-U-S--Comm-Revenue-Growth-of-137-YY-and-Revenue-Growth-of-70-YY-Issues-FY-2026-Revenue-Guidance-of-61-YY-and-U-S--Comm-Revenue-Guidance-of-115-YY-Crushing-Consensus-Expectations/>.

²⁷ *EPIC v. Dep’t of Def.*, 241 F. Supp. 2d 5 (D.D.C. 2003).

²⁸ 5 U.S.C. § 552(a)(4)(A)(ii)(II); 7 C.F.R. § 1 app. A (2)(b)(4)(ii).

Additionally, any duplication fees should be waived because disclosure of the requested information 1) is in the interest of the public, and 2) is not in the commercial interest of EPIC as the requester.²⁹

1. *Disclosure of the requested records is likely to significantly contribute to the public's understanding of FNA's activities and operations to identify and track SNAP fraud.*

EPIC seeks a waiver of chargeable fees for the requested records because disclosure is “likely to contribute significantly to public understanding of the operations or activities of the government” and thus is within the public’s interest.³⁰ In assessing whether records disclosure is within the public’s interest, USDA components consider four factors.³¹

First, EPIC’s disclosure request shows a “direct and clear” connection to “identifiable operations or activities of the Federal government,” instead of a “remote and attenuated” connection.³² Here, EPIC seeks disclosure of key activities and operations of FNA, a subcomponent of USDA, in relation to an existing contractual relationship with Palantir with a specific scope of work (SNAP fraud identification and case workflow management). Furthermore, FNA’s partnership with Palantir is part of a broader USDA initiative to secure farm, food, and agricultural programs under the National Farm Security Action Plan, which specifically includes addressing fraud and abuse of SNAP benefits as an agency priority.³³ Therefore, the requested records are directly and clearly connected to identifiable activities and operations of FNA.

Second, disclosing the requested records would be “meaningfully informative about government operations or activities.”³⁴ The specific contract requested is not already available in the public domain, nor can EPIC identify significant public information related to Palantir’s collaboration with FNA to identify SNAP benefits fraud or manage case workflows. Thus, disclosure would meaningfully inform the public’s understanding of FNA’s operations and activities.

Third, this disclosure request would increase understanding for a “reasonably broad audience” of interested persons, rather than merely support EPIC’s individual understanding.³⁵ As a representative of the news media, EPIC is entitled to the presumption this condition is met.³⁶ Additionally, EPIC has produced significant research and public education concerning the

²⁹ 7 C.F.R. § 1.12(p)(1).

³⁰ 7 C.F.R. § 1.12(p)(3).

³¹ 7 C.F.R. §§ 1.12(p)(3)(i)–(iv).

³² 7 C.F.R. § 1.12(p)(3)(i).

³³ *National Farm Security Action Plan*, U.S. Department of Agriculture 8 (2025), <https://www.usda.gov/sites/default/files/documents/farm-security-nat-sec.pdf>.

³⁴ 7 C.F.R. § 1.12(p)(3)(ii).

³⁵ 7 C.F.R. § 1.12(p)(3)(iii).

³⁶ *Id.*

digital and data infrastructure behind public benefits administration.³⁷ As a nationally regarded nonprofit with a long history of advocating for government transparency and privacy rights, EPIC possesses the ability and intention to disseminate any information obtained via this records request to a broad public audience.³⁸ Palantir's contracts with federal agencies (including those with USDA) have also drawn increased public scrutiny, indicating that the disclosure of additional details about Palantir's partnership with FNA will attract significant public attention.³⁹ Thus, there exists a reasonably broad audience of interested individuals who would be substantially better informed if the requested records were disclosed.

Finally, disclosure would enhance the public's understanding of FNA's plans for using Palantir's software to identify, track, and address SNAP benefits fraud "to a significant degree."⁴⁰ Right now, the public does not have a clear picture of how FNA's partnership with Palantir will inform the agency's benefits fraud detection efforts beyond very brief public statements. It is also unclear how this program relates to the USDA's recent attempts to collect the personal information of SNAP recipients from state governments. Disclosure would help the public understand how their data is managed and analyzed as FNA actively changes its approach to fraud detection. A clear understanding of Palantir's collaboration with USDA on SNAP benefits fraud would also ensure a fairer appeals process for individuals accused under the detection program. Therefore, the public's understanding would be enhanced to a significant degree by disclosure of these records.

2. Disclosure of the requested records is not in EPIC's commercial interest.

EPIC does not hold commercial interest in the disclosure of the requested records. In determining whether records disclosure is within the requester's commercial interest for the purpose of fee waiver, USDA components consider two factors: (1) the existence of any commercial interest of the requester, and (2) whether the public interest in disclosure overrides any identified commercial interest.⁴¹

EPIC is a registered 501(c)(3) research and advocacy nonprofit and a representative of the news media.⁴² EPIC was founded in 1994 to focus public attention on emerging privacy and civil liberties issues.⁴³ Today, EPIC is one of the leading privacy organizations in the country, and routinely publishes reports and blog posts based on records obtained from FOIA requests

³⁷ *Screened & Scored in D.C.*, EPIC.org, <https://epic.org/screened-scored-in-dc/>.

³⁸ *Open Government*, EPIC.org, <https://epic.org/issues/open-government/>.

³⁹ Whitney Curry Wimbish, *Palantir Gets an Initial \$3.9 Million to Spy on Federal Workers*, (May 18, 2026), <https://prospect.org/2026/05/18/palantir-federal-workers-surveillance-usda-social-security-veterans-affairs/>.

⁴⁰ 7 C.F.R. § 1.12(p)(3)(iv).

⁴¹ 7 C.F.R. § 1.12(p)(4).

⁴² *Being a Non-profit*, EPIC.org, <https://epic.org/about/non-profit/>.

⁴³ *Id.*

filed by EPIC staff.⁴⁴ EPIC does not accept funding from corporate or government entities, and has no profit-based motivation in making this request.⁴⁵

As a news media requester, EPIC is also entitled to the presumption by USDA components that “the public interest will be the interest primarily served by disclosure to that requester.”⁴⁶

In summary, EPIC should not be charged search fees or review fees as a recognized news media representative. Additionally, EPIC’s request for a waiver of duplication fees should be granted, since disclosure is in the public interest and will likely contribute significantly to public understanding of FNA’s management of SNAP benefits and fraud detection, and because the requested records disclosure is not primarily in EPIC’s commercial interest.

Request for Expedited Processing

EPIC requests expedited processing of the requested records disclosure. USDA components should grant expedited processing because this request involves 1) “[a]n urgency to inform the public about an actual or alleged federal government activity” and 2) EPIC makes this request as a party “primarily engaged in disseminating information.”⁴⁷

There is an urgent need to inform the public about FNA’s partnership with Palantir to make changes to SNAP benefits fraud detection. Right now, the public does not have insight into how this pilot program is influencing how SNAP program data is managed, secured, and analyzed. If systemic changes are being implemented by Palantir, then the public may have been denied their statutory right to comment under federal information laws. Thus, it is urgent that information about Palantir’s work with FNA on SNAP benefits data be disclosed so that remedies for any violations may be pursued, and so individuals have full understanding of how to exercise their personal data rights. Along these lines, the requested records are highly relevant to EPIC’s ongoing lawsuit against USDA for demanding sensitive personal information of SNAP recipients from state administrators and subsequently violating the Privacy Act, the Paperwork Reduction Act, the Administrative Procedure Act, and section 208 of the E-Government Act.⁴⁸ The requested records are urgently needed to support the public’s understanding of how USDA’s recent actions around SNAP program integrity and data management relate to each other, and whether these connections imply additional abuse of data and privacy rights.

⁴⁴ *Id.*

⁴⁵ *Id.*

⁴⁶ 7 C.F.R. § 1.12(p)(4)(ii).

⁴⁷ 7 C.F.R. § 1.6(e).

⁴⁸ *Pallek v. Rollins*, EPIC.org, <https://epic.org/documents/pallek-v-rollins/>.

Under this request for expedited processing, EPIC is primarily engaged in disseminating information. As previously described, EPIC is a news media representative with a core organizational mission of publishing information and research related to government transparency and privacy topics.

For these reasons, EPIC is entitled to expedited processing of this records request. EPIC certifies that the above information is true and correct based on knowledge and belief.⁴⁹

Conclusion

Thank you for your consideration of this request. EPIC anticipates your response to this request within ten (10) calendar days.⁵⁰ For questions regarding this request, please contact Kabbas Azhar at foia@epic.org, cc: azhar@epic.org.

Respectfully submitted,

/s/ Kabbas Azhar

Kabbas Azhar

EPIC Equal Justice Works Fellow

/s/ Karinna Gerhardt

Karinna Gerhardt

EPIC Law Clerk

⁴⁹ 7 C.F.R. § 1.6(e).

⁵⁰ 5 U.S.C. § 552(6)(E)(ii)(I); 7 C.F.R. § 1.6(e)(2).

Appendix A: Individuals Covered by Category 2 of EPIC's Records Request

Below is a list of individuals covered by Category 2 of EPIC's records request, identified by name and relevant relationship to USDA. There may be some discrepancies between the titles identified in this appendix and formal government titles.

Jennifer Tiller	Chief of Staff to the USDA Deputy Secretary and Senior Advisor to the Secretary for FNA
Kailee Buller	Former USDA Chief of Staff
Elizabeth "Tate" Bennett	USDA Chief of Staff and former USDA Principal Deputy Chief of Staff
Preston Parry	Former USDA Deputy Chief of Staff
Patrick Penn	Former FNA Deputy Under Secretary, former FNA Acting Administrator, and current Director of USDA Office of Tribal Relations
John Walk	Former Senior Advisor to the USDA Secretary and current USDA Inspector General
James Miller	Former FNA Administrator
Babs Hough	Former FNA Senior Policy Advisor
Taylor Keel	FNA Senior Advisor
Shiela Corley	Acting FNA Administrator
Gina Brand	FNA Senior Policy Advisor for Integrity
Ronald "Ron" Ward	USDA Acting Associate Administrator for SNAP
Matthew Mangiaracina	USDA Senior Policy Advisor
Gavan Boguszewski	Former FNA Confidential Assistant
Timothy "Tim" Cleveland	Former USDA Special Assistant and Advance Lead, current USDA Deputy White House Liaison
Ralph Linden	USDA Principal Deputy General Counsel and former USDA Acting General Counsel
Brian Mizoguchi	USDA Deputy General Counsel
Tyler Clarkson	USDA General Counsel
Caleb Crosswhite	Former USDA Deputy General Counsel, current USDA Principal Deputy General Counsel
Samuel "Sam" Berry	USDA Chief Information Officer and former Special Advisor
Gavin Kliger	Former DOGE representative at USDA
Jordan Wick	Former DOGE representative at USDA
Michael Cole	Former Senior Advisor and Senior Team Leader for Government Efficiency at USDA
Akash Bobba	DOGE representative at USDA
Conor Fennessy	DOGE representative at USDA
Joshua Fox	DOGE representative at USDA
Daniel Abrahamson	Former Senior Advisor for Government Efficiency at USDA
Jeremy Lichtman	Advisor for Government Efficiency at USDA

Janet Sorensen	USDA Assistant Inspector General for Audit and former Acting Inspector General
Yarisis Rivera-Rojas	USDA Acting Assistant Inspector General for Audit
Craig Goscha	USDA Acting Assistant Inspector General for Analytics and Innovation
Peter Sima-Eichler	Former USDA Acting Deputy Inspector General and Assistant Inspector General for Analytics and Innovation
Christy Slamowitz	USDA Counsel to the Inspector General