



July 21, 2020

Via FOIAonline

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Chief Freedom of Information Act Officer
Office of Privacy and Open Government
U.S. Department of Commerce
1401 Constitution Avenue NW
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Vernon E. Curry, PMP, CIPP/G
FOIA Officer
U.S. Census Bureau, Room 3J235
4600 Silver Hill Road
Suitland, MD 20746

RE: Freedom of Information Act Request

Dear FOIA Officers:

Campaign Legal Center (“CLC”) submits this request to the Department of Commerce (“Department”) and the Bureau of the Census (“Census Bureau” or “Bureau”) (together, the “Agencies”) pursuant to the Freedom of Information Act, 5 U.S.C. § 552 *et seq.* Please note that CLC is concurrently submitting separate copies of this request to the Department and the Bureau.

I. Requested Records

CLC requests every written communication dated July 1, 2019 or later that (a) contains at least one of the following terms: “executive order,” “EO,” “E.O.,” “apportionment,” “reapportionment,” “apportion,” “reapportion,” “transmittal,” “redistricting,” “Memorandum for the Secretary of Commerce,” “White House,” “WH,” “President,” or “Trump”; *and*

(b) contains at least one of the following terms: “inhabitants,” “inhabitant,” “undocumented,” “alien,” “aliens,” “illegal immigrant,” “illegal immigrants,” “illegals,” or “Immigration and Nationality Act.”

Please note that the term “written communication” includes, but is not limited to, email messages, text messages, instant messages, and office memoranda. Responsive records may include both digital and physical records.

If some portions of the requested records are exempt from disclosure, please (1) disclose any reasonably segregable non-exempt portions of the requested records, pursuant to 5 U.S.C. § 552(b); and (2) provide an index of the withheld materials as required under *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973), cert. denied, 415 U.S. 977 (1973).

II. Custodians To Be Searched

Please search all documents in the possession of each custodian at your agency listed below:

Department of Commerce custodians

- Wilbur L. Ross
- Karen Dunn Kelley

Census Bureau custodians

- Steven Dillingham
- Ron Jarmin
- Nathaniel Cogley
- Adam Korzeniewski
- Albert E. Fontenot Jr.
- James B. Treat
- Burton Reist
- John Abowd
- Victoria Velkoff
- Timothy Olson
- James Whitehorne

For each custodian searched, please search all devices and accounts that the custodian uses to conduct government business, regardless of whether those devices and accounts are government-issued.

III. Background

The Constitution requires the federal government to conduct an “actual enumeration” of the whole U.S. population—regardless of immigration status—every ten years.¹ Congress must use the census results to reapportion seats in the House of Representatives based on “the whole number of persons” living in each state.²

As the Constitution commands, the Census Bureau is currently conducting the 2020 Census. This decennial population count will determine not only how many members of Congress represent each state, but how political power is distributed within states, and how the federal government spends trillions of dollars.³

Unfortunately, some actors within the federal government are intent on sacrificing the integrity of the 2020 Census for the sake of a political agenda. This effort has been underway for years. In 2017, the Department of Commerce solicited other federal agencies to submit a formal request to add a citizenship question to the 2020 Census questionnaire.⁴ In response, the Department of Justice (“DOJ”) formally requested a citizenship question in December 2017, citing a purported need for more granular citizenship data to enforce the Voting Rights Act.⁵ Secretary of Commerce Wilbur Ross then ordered the Census Bureau to add the citizenship question, overruling career experts.⁶

The U.S. Supreme Court later held Secretary Ross’s decision illegal, finding that the VRA rationale was “contrived.”⁷ However, on July 11, 2019, President Donald Trump issued an executive order, E.O. 13880, directing the Commerce Department to collect citizenship data through alternative means.⁸ Pursuant to E.O. 13880, the Census Bureau is attempting to collect citizenship information through administrative records, including state driver licenses.⁹ However, there is no indication that the records the Census Bureau is collecting would make it possible for the Bureau to distinguish between lawfully present and undocumented non-U.S. citizens.

¹ U.S. Const. art. I § 2 cl. 3.

² U.S. Const. amend. XIV § 2.

³ See *Counting for Dollars 2020: The Role of the Decennial Census in the Geographic Distribution of Federal Funds*, GW INST. PUB. POLICY (Apr. 29, 2020), <https://gwipp.gwu.edu/counting-dollars-2020-role-decennial-census-geographic-distribution-federal-funds>.

⁴ See *Dep’t of Commerce v. New York*, 139 S. Ct. 2551, 2574-75 (2019).

⁵ *Id.* at 2562.

⁶ *New York*, 139 S. Ct. at 2569.

⁷ *Id.* at 2575.

⁸ Exec. Order No. 13880, *Collecting Information About Citizenship Status in Connection With the Decennial Census*, 84 Fed. Reg. 33821 (July 11, 2019).

⁹ Hansi Lo Wang, *4 States Agree To Share Residents’ ID Information With The Trump Administration*, NPR (July 15, 2020), <https://www.npr.org/2020/07/15/891563691/4-states-agree-to-share-residents-id-information-with-the-trump-administration>.

Despite the constitutional imperative to count everyone and the practical limitations of the Bureau's data collection, on July 21, 2020, President Trump issued a Memorandum on Excluding Illegal Aliens From the Apportionment Base Following the 2020 Census. The Memorandum states that "it is the policy of the United States to exclude from the apportionment base aliens who are not in a lawful immigration status under the Immigration and Nationality Act, . . . to the maximum extent feasible and consistent with the discretion delegated to the executive branch."¹⁰ The Memorandum further directs the Commerce Department to provide information to facilitate the exclusion of undocumented immigrants from the apportionment base.¹¹

IV. Application for Fee Waiver or Limitation of Fees

CLC requests that all fees for this request be waived or, in the alternative, limited. This request qualifies for a fee waiver or reduction because it is non-commercial in nature and would serve the public interest by contributing significantly to public understanding of the operations or activities of the Department and the Census Bureau. CLC is also entitled to an exemption from search and review costs because CLC qualifies as a representative of the news media.

In the event that CLC's application for a complete fee waiver is denied and you estimate that more than \$100 in fees will be charged, please contact me before proceeding with any search, review, or duplication.

A. The request is made for non-commercial purposes and will contribute significantly to public understanding of government activities.

Under FOIA, an agency must provide requested records without charge or at a reduced charge 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."¹² A Department of Commerce regulation provides six factors to consider when deciding whether to waive or reduce FOIA fees:

¹⁰ President Donald Trump, Memorandum on Excluding Illegal Aliens From the Apportionment Base Following the 2020 Census (July 21, 2020), <https://assets.documentcloud.org/documents/6999106/July-21-2020-Memorandum-On-Excluding-Illegal.pdf>.

¹¹ *Id.*

¹² 5 U.S.C. § 552(a)(4)(A)(iii).

- (1) “whether the subject of the requested records concerns the operations or activities of the Government”;
- (2) “whether the disclosure is ‘likely to contribute’ to an understanding of Government operations or activities” by disclosing “meaningfully informative” records that are not already public;
- (3) “[w]hether disclosure of the requested information will contribute to the understanding of a reasonably broad audience of persons interested in the subject”;
- (4) “whether the disclosure is likely to contribute ‘significantly’ to public understanding of Government operations or activities”—i.e., whether the public’s understanding will “be significantly enhanced by the disclosure”
- (5) “whether the requester has a commercial interest that would be furthered by the requested disclosure”; and
- (6) “[w]hether any identified commercial interest of the requester is sufficiently great, in comparison with the public interest in disclosure, that disclosure is ‘primarily in the commercial interest of the requester.’”¹³

All six factors favor CLC’s application for a fee waiver in connection with this request.

First, the request indisputably “concerns the operations or activities of the Government”—specifically, the 2020 Census.

Second, the request will contribute to public understanding of the Census Bureau’s operations by uncovering meaningfully informative records about a governmental decision that raises many important and alarming questions.

Currently, there is virtually no information in the public record about why the Memorandum was drafted and subsequently signed; what legal basis (if any) the government has adopted for this action; whether the Census Bureau and the Commerce Department support this decision; and whether the government’s stated reasons for excluding undocumented immigrants from the census are mere pretext. Moreover, it is unclear how the Census Bureau plans to implement the Memorandum. The government has not explained any methodology for determining undocumented status.

The Census Bureau must possess at least some records responsive to this request. The decision to exclude undocumented immigrants—a brazenly unconstitutional reversal of longstanding Census Bureau policy—must have led to, at the very least, significant email traffic at the highest levels of the Bureau and the Commerce Department. Memoranda on the subject likely

¹³ 15 C.F.R. § 4.11(l).

would have been exchanged as well. But *none* of the responsive records are currently in the public domain.

Third, disclosure of the requested records will contribute to the understanding of at least a reasonably broad audience of persons, not merely CLC’s own understanding.

In assessing whether this factor is satisfied, the Bureau considers the “requester’s expertise in the subject area and ability and intention to effectively convey information to the public.”¹⁴ A requester that qualifies as “a representative of the news media” is presumed to satisfy this factor.¹⁵

For the reasons explained below,¹⁶ CLC qualifies as a representative of the news media. CLC is therefore entitled to a presumption that its request will contribute to the understanding of at least a reasonably broad audience. However, regardless of whether the Bureau applies this presumption, CLC satisfies the “reasonably broad audience” test by virtue of its expertise and its ability and intention to disseminate information from the requested records.

CLC has more than enough expertise in the relevant subject area to help educate a broad audience. Founded in 2002, CLC is a nationally respected source of nonpartisan expert analysis and legal advice on all aspects of the democratic process.¹⁷ CLC has significant experience in litigation involving the decennial census,¹⁸ and employs several attorneys with particular expertise on census operations.

CLC also has the ability and intention to convey information from the requested records to the public. CLC plans to publish responsive records and write analyses of those records for public consumption, which will be shared on CLC’s website and social media accounts. CLC’s large online presence¹⁹ will

¹⁴ 15 C.F.R. § 4.11(l)(2)(iii).

¹⁵ *Id.*

¹⁶ See *infra* Part IV(B).

¹⁷ See *Impact*, CAMPAIGN LEGAL CENTER, <https://campaignlegal.org/impact> (last visited June 29, 2020).

¹⁸ See *CLC v. Bureau of the Census (FOIA Delay suit)*, CAMPAIGN LEGAL CTR., <https://campaignlegal.org/cases-actions/clc-v-bureau-census-foia-delay-suit> (updated Mar. 9, 2020); *CLC Sues DOJ Over Unlawful Silence in Decision-Making Process Over Census Citizenship Question*, CAMPAIGN LEGAL CTR. (May 23, 2018), <https://campaignlegal.org/update/clc-sues-doj-over-unlawful-silence-decision-making-process-over-census-citizenship-question>; Brief of Former Directors of the Census Bureau as *Amici Curiae* in Support of Appellees, *Evenwel v. Abbott*, 136 S. Ct. 1120 (2016) (No. 14-940) (amicus brief on which CLC served as co-counsel).

¹⁹ CLC has approximately 28,300 followers on Twitter and more than 11,700 followers on Facebook. Campaign Legal Center (@CampaignLegal), TWITTER, <https://twitter.com/CampaignLegal> (last visited June 29, 2020); Campaign Legal Center

enable these materials to reach at least a “reasonably broad audience.” In the past, CLC has succeeded at disseminating information broadly through reports,²⁰ blogs,²¹ op-eds,²² and videos,²³ among other media. CLC also shares information and analysis with traditional news organizations, which regularly cite and rely upon CLC’s work.²⁴

When CLC disseminates information based on records responsive to this FOIA request, that information is likely to capture the interest of a large audience. The 2020 Census is a matter of intense public interest and has received media scrutiny to match.²⁵ The audience for information derived from CLC’s FOIA

(@CampaignLegalCenter), FACEBOOK,
https://www.facebook.com/CampaignLegalCenter/?ref=br_rs (last visited June 29, 2020). CLC also publishes updates by email to its many supporters.

²⁰ See, e.g., Daniel Hessel, *Litigating Partisan Gerrymandering Claims Under State Constitutions*, CAMPAIGN LEGAL CTR. (July 17, 2018), https://campaignlegal.org/sites/default/files/2018-07/CLC%20Issue%20Brief%20Litigating%20Partisan%20Gerrymandering%20under%20State%20Constitutions_0.pdf; Lawrence M. Noble & Brendan M. Fischer, *Funding the Presidential Nominating Conventions: How a Trickle of Money Turned Into a Flood*, CAMPAIGN LEGAL CTR. (July 26, 2016), <http://www.campaignlegalcenter.org/sites/default/files/Funding%20the%20Presidential%20Nominating%20Conventions%20Report.pdf>.

²¹ See, e.g., Jeff Zalesin, *Census Bureau’s Citizenship Data Collection Is Misguided and Harmful*, CAMPAIGN LEGAL CTR. (Jan. 24, 2020), <https://campaignlegal.org/update/census-bureaus-citizenship-data-collection-misguided-and-harmful>; Maggie Christ, *Constitutional Challenges Facing Our Democracy*, CAMPAIGN LEGAL CTR. (Sept. 18, 2019), <https://campaignlegal.org/update/constitutional-challenges-facing-our-democracy>; Molly Danahy, *The U.S. Supreme Court Should Stop Census Citizenship Question*, CAMPAIGN LEGAL CTR. (April 3, 2019), <https://campaignlegal.org/update/us-supreme-court-should-stop-census-citizenship-question>; Brendan M. Fischer, *How Trump’s Plan to Repeal the Johnson Amendment Could Unleash ‘Super Dark Money’ Into Our Elections*, CAMPAIGN LEGAL CTR. (Feb. 3, 2017), <http://www.campaignlegalcenter.org/news/blog/how-trump-s-plan-repeal-johnson-amendment-could-unleash-super-dark-money-our-elections>.

²² See, e.g., Paul Smith, *Census paves moment of truth for the Supreme Court and rule of law*, THE HILL (July 9, 2019), <https://thehill.com/opinion/judiciary/452224-census-paves-moment-of-truth-for-the-supreme-court-and-rule-of-law>; Danielle Lang & Thea Sebastian, *Too Poor to Vote*, N.Y. TIMES (Nov. 1, 2018), <https://www.nytimes.com/2018/11/01/opinion/election-voting-rights-poverty.html>; Trevor Potter, *Donald Trump Hasn’t Solved Any of His Conflicts of Interest*, WASH. POST (Jan. 11, 2017), https://www.washingtonpost.com/posteverything/wp/2017/01/11/donald-trump-hasnt-solved-any-of-his-conflicts-of-interest/?utm_term=.0e80b538fb8f.

²³ See, e.g., Campaign Legal Center, *Distorted Democracy: The Fight Against Gerrymandering*, YOUTUBE (March 7, 2019), https://www.youtube.com/watch?v=HgAVos_tK8E.

²⁴ See, e.g., Alayna Treene, Jonathan Swan & Harry Stevens, *Scoop: Inside a top Trump adviser’s fundraising mirage*, AXIOS (May 5, 2019), <https://www.axios.com/david-bossie-fundraising-presidential-coalition-3bf22829-8a89-4a10-84b7-7310e02c2ef2.html>.

²⁵ See *2020 Census Operational Plan*, *supra* note 3 at 103 (“There is a lot of press coverage surrounding the 2020 Census questionnaire.”); *Covering the 2020 Census*, POYNTER, <https://www.poynter.org/covering-the-2020-census-poynter/#1549662376277-7e2acdf9-0a29>

request is therefore more than large enough to pass the “reasonably broad audience” test.

Fourth, the contribution that CLC’s request will make to public understanding will be significant, not merely marginal.

As already noted, the public entirely lacks the information it needs to answer the most important questions about the new Memorandum: Why was this decision made? Do the officials in charge of implementing it believe it reflects sound legal and policy judgment? How will the order be implemented? And what does all this mean for undocumented immigrants’ participation in the 2020 Census?

The public would benefit significantly from access to the requested records, which would put to rest any speculation—positive or negative—about the answers to these questions.

Fifth, CLC has no commercial interest in its FOIA request. CLC is a non-profit public-interest organization organized under Section 501(c)(3) of the Internal Revenue Code. CLC is submitting this FOIA request for the sole purpose of furthering its public-interest mission.

Sixth, because CLC has no commercial interest at all in the request, it necessarily follows that the request cannot be “primarily in the commercial interest of the requester.”

For these reasons, CLC requests that any applicable fees associated with this request be waived pursuant to 5 U.S.C. § 552(a)(4)(A)(iii). A fee waiver in this instance would fulfill Congress’s intent in amending FOIA. *See Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1312 (D.C. Cir. 2003) (“Congress amended FOIA to ensure that it be liberally construed in favor of waivers for noncommercial requesters.”) (quotation marks omitted).

B. CLC is exempt from search and review fees as a “representative of the news media.”

Even if CLC is denied a complete waiver of fees, it cannot be charged search or review fees because it meets the definition of a “representative of the news media” under FOIA.²⁶

(“Covering the census is the epitome of public service and accountability journalism, and the 2020 Census presents more opportunities than ever before for newsrooms.”).

²⁶ *See* 5 U.S.C. § 552(a)(4)(A)(ii)(II)-(III); 15 C.F.R. § 4.11(c)(1) (providing that representatives of the news media cannot be charged FOIA fees except for duplication beyond the first 100 pages).

“[T]he term ‘a representative of the news media’ means any person or entity that gathers information of potential interest to a segment of the public, uses its editorial skills to turn the raw materials into a distinct work, and distributes that work to an audience.”²⁷ This statutory term must “be interpreted broadly if [FOIA] is to work as expected, . . . In fact, *any person or organization which regularly publishes or disseminates information to the public . . . should qualify for waivers as a ‘representative of the news media.’*”²⁸

In applying the “representative of the news media” test, courts focus on the requester rather than the specific FOIA request.²⁹ News-media status extends not only to traditional news organizations, but also to entities that disseminate information “by issuing press releases to media outlets in order to reach the public indirectly.”³⁰

CLC qualifies as a representative of the news media because it applies expertise and editorial skills to turn raw materials into reports, articles, and op-eds that are widely disseminated on its blog,³¹ through its own website,³² through social media platforms and regular emails to its supporters, and through other outlets. CLC additionally applies editorial skill to analyze and disseminate materials to other news media outlets, which regularly cite and rely upon CLC’s work.³³ CLC’s attorneys are regularly quoted in news articles dealing with their areas of expertise, including the census.³⁴

Courts have found that other organizations with functionally similar missions and engaged in similar public education activities qualify as representatives of the news media, even if engaged in litigation or other advocacy beyond educating the public. For example, in *Cause of Action v. FTC*, the D.C. Circuit granted news-media status to a public-interest advocacy organization that commented to other media outlets about documents it obtained under FOIA.³⁵ Similarly, a district court found that the Electronic Privacy Information

²⁷ 5 U.S.C. § 552(a)(4)(A)(ii)(III).

²⁸ 132 Cong. Rec. S14298 (daily ed. Sept. 30, 1986), cited in *Nat’l Sec. Archive v. DOD*, 880 F.2d 1381, 1386 (D.C. Cir. 1989).

²⁹ *Cause of Action v. FTC*, 799 F.3d 1108, 1121 (D.C. Cir. 2015).

³⁰ *Id.* at 1125-26.

³¹ See Campaign Legal Center blog, <http://www.campaignlegalcenter.org/news/262> (last visited June 29, 2020).

³² See Campaign Legal Center Reference Materials library, <http://www.campaignlegalcenter.org/research/reference-materials> (last visited June 29, 2020).

³³ See, e.g., Treene et al., *supra* note 24.

³⁴ See, e.g., Max Greenwood, *Census delay threatens to roil redistricting*, The Hill (May 15, 2020), <https://thehill.com/homenews/campaign/497681-census-delay-threatens-to-roil-redistricting>.

³⁵ 799 F.3d 1108, 1121-25 (D.C. Cir. 2015).

Center, a public-interest group that published books and a biweekly email newsletter, qualified as a representative of the news media.³⁶

Therefore, if the Bureau does not grant CLC a complete public-interest waiver of all fees for this request, CLC should nevertheless be exempted from any fees for search, review, and the first 100 pages of duplication.

V. Application for Expedited Processing

CLC requests that the processing of this request be expedited pursuant to 15 C.F.R. § 4.6(f)(1). This request qualifies for expedited processing for two independent reasons.

First, the request involves “[a] matter of widespread and exceptional media interest involving questions about the Government’s integrity which affect public confidence.”³⁷

The 2020 Census has attracted “widespread and exceptional media interest,”³⁸ and for good reason: the census is required by the U.S. Constitution,³⁹ and the results will be used to reapportion Congress, redraw voting districts, and distribute trillions of federal dollars.⁴⁰ Media interest in the census has only grown as the COVID-19 pandemic has put the census under stress, forcing operational delays and raising questions about the Bureau’s ability to conduct nonresponse followup.⁴¹ Unsurprisingly, the President’s latest Memorandum has generated “widespread and exceptional”⁴² interest from journalists, beginning when the order was an unconfirmed rumor.⁴³

³⁶ Elec. Privacy Info. Ctr. v. DOD, 241 F. Supp. 2d 5, 10-15 (D.D.C. 2003).

³⁷ 15 C.F.R. § 4.6(f)(1)(iii).

³⁸ *2020 Census Operational Plan, Version 4.0* 103, U.S. CENSUS BUREAU (2018), <https://www2.census.gov/programs-surveys/decennial/2020/program-management/planning-docs/2020-oper-plan4.pdf> (“There is a lot of press coverage surrounding the 2020 Census questionnaire.”); *Covering the 2020 Census*, POYNTER, <https://www.poynter.org/covering-the-2020-census-poynter/#1549662376277-7e2acdf9-0a29> (“Covering the census is the epitome of public service and accountability journalism, and the 2020 Census presents more opportunities than ever before for newsrooms.”).

³⁹ U.S. Const. art. I § 2 cl. 3.

⁴⁰ *See Counting for Dollars*, *supra* note 3.

⁴¹ *See, e.g.*, Greenwood, *supra* note 34; Alex Ortiz, *COVID-19 another obstacle for 2020 Census response rates in Will County*, HERALD-NEWS (June 26, 2020), <https://www.theherald-news.com/2020/06/26/covid-19-another-obstacle-for-2020-census-response-rates-in-will-county/aw58fjx/>.

⁴² 15 C.F.R. § 4.6(f)(1)(iii);

⁴³ *See, e.g.*, *Trump expected to exclude undocumented migrants from U.S. census*, REUTERS (July 17, 2020), <https://www.reuters.com/article/us-usa-census-migrants/trump-expected-to-exclude-undocumented-migrants-from-u-s-census-idUSKCN24I2JE>; John T. Bennett, *Trump administration preparing executive order banning undocumented immigrants from being counted in census*, INDEPENDENT (July 17, 2020),

This action has drawn outrage from many stakeholders, who pointed out that it is unconstitutional and appears to be motivated by ideological and partisan concerns.⁴⁴ In other words, this mysterious episode has raised “questions about the Government’s integrity which affect public confidence.”⁴⁵

Second, the request involves “[a]n urgency to inform the public about an actual or alleged Federal Government activity,” and CLC is “primarily engaged in disseminating information.”⁴⁶

Right now, the many dedicated public servants at the Census Bureau, as well as countless external stakeholders, are working hard to encourage public participation in the 2020 Census. This task is inherently time-sensitive, and made more so by the operational delays caused by COVID-19.

As of July 17, 2020, only 62.1% of households have responded to the 2020 Census.⁴⁷ People across the country who have already responded need to know whether they will be included in the official count, and people who have not yet responded need confirmation that responding to the Census will not be a waste of time. Moreover, the Census Bureau’s partner organizations need clarity so they can appropriately tailor their get-out-the-count efforts and allocate their scarce resources.

CLC is well-suited to disseminate information from the requested records once they are disclosed. As already explained, CLC conveys information to the public by creating original editorial content and by sharing facts and analysis with news organizations.⁴⁸ That public education is not CLC’s “sole occupation” is no reason to deny expedited processing, as Department of Commerce regulations explicitly recognize.⁴⁹

I certify that my statements concerning the need for expedited processing are true and correct to the best of my knowledge and belief.

* * *

<https://www.independent.co.uk/news/world/americas/us-politics/trump-undocumented-immigrants-census-white-house-a9625516.html>.

⁴⁴ See, e.g., Vanita Gupta (@vanitaguptaCR), TWITTER (July 17, 2020, 2:56 PM), <https://twitter.com/vanitaguptaCR/status/1284200366058373121>; Kristen Clarke (@KristenClarkeJD), TWITTER (July 17, 2020, 4:19 PM), <https://twitter.com/KristenClarkeJD/status/1284221085056217090>.

⁴⁵ 15 C.F.R. § 4.6(f)(1)(iii).

⁴⁶ 15 C.F.R. § 4.6(f)(1)(iv).

⁴⁷ See Response Rates <https://2020census.gov/en/response-rates.html>.

⁴⁸ *Supra* Part IV(B).

⁴⁹ 15 C.F.R. § 4.6(f)(3).

In order to expedite delivery of the requested documents and in order to reduce possible fees incurred, I am requesting that these documents be delivered to me via email, in PDF format.

Please email copies of responsive documents to:

Dlang@campaignlegalcenter.org

Should you elect, for any reason, to withhold, redact, or deny the release of any record responsive to this request, I request that you provide me with an explanation for each withholding/redaction, along with pertinent legal citations.

Please confirm receipt of this request and provide me with an estimate of processing time. Thank you for your attention to this matter.

Sincerely,

/s/ Danielle Lang

Danielle Lang
Christopher Lamar
Caleb Jackson
Jeff Zalesin

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