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Washington Focus: The Washington Post revealed that some documents turned over by the National Archives and Records Administration to the House Select Committee investigating the Jan. 6, 2021, insurrection at the Capitol had been ripped up by former President Donald Trump during his time in office. Some documents turned over by the National Archives had been taped back together by records management staff at the White House, but other records turned over to the Jan. 6 committee by the National Archives had not yet been reconstructed. New York University law professor Stephen Gillers told the Post that documents torn up by Trump are clearly government property under the Presidential Records Act. He noted that "destroying them could be a crime under several statutes that make it a crime to destroy government property if that was the intent of the defendant. A president does not own the records generated by his own administration. The definition of presidential records is broad. Trump's own notes to himself could qualify and destroying them could be the criminal destruction of government property."

Court Finds Intelligence Investigation Covered by *Glomar* Response

Patrick Eddington, a researcher at the Cato Institute, has recently taken to submitting FOIA requests to a number of agencies aimed at challenging government FOIA policies, often by asking for records that are clearly exempt from FOIA to apparently test those policies and practices in court.

The latest case in this saga is one Eddington filed against the Department of Justice's National Security Division for records that mention Amir Mohamed Meshal – a U.S. citizen who was detained by both Kenyan and Ethiopian government entities between 2006 and 2007. In 2007, Eddington was working as a senior policy advisor to Rep. Rush Holt (D-NJ). He received information from a journalist that Meshal was being detained by Kenyan authorities in Somalia. Eddington learned that Meshal lived in Holt's district. He contacted Meshal's father, who told him that he had been informed by the FBI that his son was being held by

Kenyan authorities on terrorism charges. After informing Holt, Eddington contacted the FBI and spoke with then-Assistant Director for Counterterrorism Joseph Billy, who indicated that Meshal was in the custody of the Ethiopian government and that the FBI had access to him. During the next two months, Eddington was in near daily contact with the FBI and the State Department about Meshal. Meshal was released from detention in May 2007. In 2009, Meshal filed a *Bivens* action against several FBI agents, alleging that while traveling in Africa, he was detained and tortured on behalf of the U.S. government. The district court dismissed his case and the D.C. Circuit affirmed that decision. His case attracted considerable media attention and articles appeared in the *New York Times*, the *Chicago Tribune* and the *Los Angeles Times*.

Eddington submitted a FOIA request to the Justice Department in 2019, asking for records on Meshal from the National Security Division. The agency provided 451 pages of records and withheld two records under Exemption 5 (privileges). The agency also invoked a *Glomar* response neither confirming nor denying the existence of records on the basis of Exemption 1 (national security) and Exemption 7(A) (interference with ongoing investigation or proceeding). By the time Judge Florence Pan ruled in the case, Eddington's only remaining challenge was to the *Glomar* response with respect to records from the Intelligence and Counterterrorism units of NSD. Eddington argued that DOJ had officially acknowledged the records and that that the *Glomar* response was improper.

Eddington claimed there were three main sources of information supporting his official acknowledgement challenge – (1) evidence in the *Bivens* lawsuit filed by Meshal, (2) a statement from the FBI media spokesman that the FBI interviewed Meshal in Nairobi, and (3) a statement made by the FBI and the State Department to Meshal's family.

Pan first explained that to successfully invoke the official acknowledgement standard, a plaintiff must show that the information requested was as specific as the information previously released, that the requested information must match the information previously disclosed, and that the information requested must have already been disclosed through an official and documented disclosure. She pointed out that "under the foregoing standard, Eddington must point to a specific, official acknowledgment that the NSD investigated Meshal for terrorism-related activities, in order to overcome the government's *Glomar* response. He fails to do so. Indeed, it appears that no such acknowledgement has ever been made."

Eddington argued that facts disclosed in Meshal's *Bivens* action made it implausible for the government to claim that no records exist about Meshal being held by the Kenyan and Ethiopian governments. But Pan observed that "the general facts discussed in the D.C. Circuit opinion, however, do not contain any acknowledgement by the government that NSD investigated Meshal or considered prosecuting him for a terrorism-related offense. Further, the DOJ has not publicly commented on the truth of the allegations in the complaint in Meshal's case, and the Counterterrorism Section never provided any records in discovery during the litigation. Thus, the cited information from Meshal's *Bivens* action does not amount to an 'official acknowledgment' that responsive records exist in the Office of Intelligence or the Counterterrorism Section of the NSD or that Meshal was the subject of a counterterrorism investigation by the NSD." She also rejected Eddington's contention that the FBI had admitted interviewing Meshal in Nairobi. She indicated that "but Eddington's FOIA request was for records kept *by the NSD*. The statement that FBI agents interviewed Meshal in Nairobi does not prove that the NSD is in possession of any records memorializing those interviews."

Pan agreed with the government that its *Glomar* response was appropriate under both Exemption 1 and Exemption 7(A). Eddington argued that the Exemption 7(A) *Glomar* response was improper because it was common knowledge that Meshal had been investigated. However, Pan noted that "the Court rejects

Eddington's contention that the DOJ publicly acknowledged a terrorism-related investigation of Meshal by the NSD. Further, the Court agrees with the DOJ that confirming or denying the existence of records in the hands of the NSD would reveal whether prosecutors investigated Meshal for terrorism-related offenses; and that this could provide insight into the information that the government has at its disposal as it attempts to prevent and prosecute terrorism crimes." (*Patrick Eddington v. U.S. Department of Justice*, Civil Action No. 19-1991 (FYP), U.S. District Court for the District of Columbia, Jan. 25)

Views from the States…

The following is a summary of recent developments in state open government litigation and information policy.

Connecticut

An appeals court has ruled that Joao Godoy did not have standing to challenge the FOI Commission's order prohibiting the Town of Avon from charging fees to Joao Godoy for several requests he made to the town for records concerning two police reports of investigations of unregistered vehicles. Avon denied the requests, indicating that the investigations of both incidents were still open and that he could come to inspect records in about 60 days. When Godoy went to the police department to inspect the personnel record of Lieutenant Kelly Walsh, which he had also requested, the police had him sign an acknowledgement form to review the records. When he went later to inspect the records concerning the investigations of the two unregistered vehicles, the police once again asked him to sign an acknowledgment form. He refused to do so, and the police refused to release the copies of records to Godoy. Godoy then filed a complaint with the FOI Commission, alleging that it was improper for the Avon police to refuse to provide the records. At the FOI Commission hearing, the Avon police testified that it prepared copies of the records for Godoy to inspect but because he was required to pay for copies of records if he decided to take any of the records with them, the police department required requesters to sign an acknowledgment form to keep track of the number of pages involved. The hearing officer concluded that requiring a requester to sign an acknowledgement form before receiving records could have a chilling effect on requesters. The final order included language that Avon "shall not require requesters to sign a form as a condition precedent to the receipt of public records." Avon appealed the FOI Commission's order to the trial court. The trial court upheld the Commission's order to the extent that it prohibited the signing of a form as a condition for receiving copies of records but found that the Commission had erred to the extent that the order prohibited signing a form as a condition to inspect original records. Godoy then asked the court to reconsider its ruling. When the trial court denied the motion, Godoy filed an appeal to the appellate court. The appellate court found that Godoy did not have standing to challenge the ruling because he was not actually aggrieved by it. The court noted that "because we conclude that the commission's order did not extend to original public records, the court's conditional holding as to such documents is dictum. In other words, Godoy's interest in unconditional access to the public records he sought was unaffected by the court's decision because the court affirmed the commission's decision regarding the only documents at issue before the commission – copies of public records. Consequently, we conclude that Godoy has failed to demonstrate a specific, personal, and legal interest in the subject matter of the challenged decision." (*Town of Avon, et al. v. Freedom of Information Commission*, No. AC 44255, Connecticut Appellate Court, Jan. 25)

A trial court has ruled that the FOI Commission erred in finding that the City of Bridgeport should remove specific redactions made in records disclosed to Marlando Daley pertaining to his murder conviction and that the City should conduct an additional search. The trial court indicated that Daley's request to

ACCESS REPORTS

Bridgeport asked only for a search for responsive records and there had been no denial before Daley filed his complaint with the FOI Commission. The court noted that "as of the date of the filing of the complaint with the FOIC, August 20, 2019, there was no denial to appeal, no case and controversy, and therefore no subject matter jurisdiction in the FOIC. Thus, given the complainant's request and the fact that there was no express denial, no denial could exist, and therefore no statutory jurisdiction could exist, before August 26, 2019 at the earliest." The FOIC argued that it had jurisdiction because Bridgeport had failed to respond within the statutory four business days, which established jurisdiction. However, the court pointed out that Daley had explicitly allowed Bridgeport in the text of his request 14 days in which to respond. The court observed that "not only does this argument ignore the complainant's own explicit requested response date, but it also ignores the fact that the plaintiffs did not receive the FOIA request until August 19, 2019." The court explained that "there can be no 'deemed denial' that occurs earlier than the complainant's own explicit requested response date. An explicit requested response date which is longer than the statutory four business days must override the statutory default." The court concluded that "the FOIC should have dismissed the complainant's complaint for lack of subject matter jurisdiction. Instead, the FOIC decided a controversy that did not exist at the time of the complainant's complaint, on a complaint which did not and could not have defined the issues, and without jurisdiction because of the lack of an actual case and controversy and because there was no effective denial from which to acquire jurisdiction." (*City of Bridgeport, et al. v. Freedom of Information Commission*, No. HHB-CV-216064435, Connecticut Superior Court, Judicial District of New Britain, Jan. 21)

Illinois

A court of appeals has ruled that the circuit court of Cook County erred in concluding that the Chicago Police Department was required to disclose records to the *Chicago Sun*-Times concerning the investigation of Richard Vanecko, a nephew of then-Mayor Richard Daley for causing the death of David Koschman, without first conducting an *in camera* review of the records to determine if any records were exempt. The assault on Koschman occurred in 2004. He fell backwards, hit his head, and later died of his injuries. The case generated considerable media interest, resulting in a host of FOIA requests. In earlier litigation, the Illinois supreme court ruled that the Better Government Association could not obtain grand jury records because they were protected by protective orders issued in 2012 and 2014. In 2019, the *Sun-Times* submitted a FOIA request for all records maintained by the Chicago Police regarding the death of David Koschman. CPD denied the request, telling the *Sun-Times* that it had already provided all non-exempt records in response to its 18 previous requests. It subsequently released an additional 73 pages with redactions that had been withheld pursuant to an earlier FOIA request from the *Sun-Times*. After unsuccessfully complaining to the Public Access Counselor, part of the Attorney General's Office, the *Sun-Times* filed suit in the Cook County circuit court. Because CPD did not rely on any affirmative defenses for non-disclosure, the circuit court dispensed with the request for an index and ordered CPD to disclose all the records. CPD filed an appeal of that order, arguing the statute required a court to conduct an *in camera* review before issuing a disclosure order. The appeals court agreed with the *Sun-Times* that CPD should be subject to forfeiture for its failure to assert any affirmative defenses. However, the appeals court noted that "the circuit court's order, if affirmed, would put the police department in the Catch-22 situation of having to decide which of two conflicting court orders to obey and which to flout under pain of contempt. Nothing in FOIA requires the judicial system to put anyone in that position." Instead, the appeals court indicated that the circuit court should have conducted an *in camera* review. The appeals court pointed out that given the nature of the records at issue here, and the uncertain applicability of the grand jury protective order, the circuit court should have conducted an *in camera* review of the documents before ordering their wholesale release." The appeals court remanded the case back to the circuit court to conduct an *in camera* review. (*Chicago Sun-Times v. Chicago Police Department*, No. 1-20-1262, Illinois Appellate Court, First District, Jan. 21)

The Federal Courts…

A federal court in Louisiana, ruling on a number of related requests submitted by Atchafalaya Basinkeeper, the Louisiana Crawfish Producers Association-West, and Healthy Gulf to the U.S. Army Corps of Engineers provides a good illustration of the difficulties often experienced when an agency like the Corps of Engineers struggles to respond appropriately to multiple requests under such circumstances. The results, as probably should be expected, are a mixed bag where the court finds the Corps' **search** sufficient sometimes while missing the mark in respect to other similar search requests. The organizations submitted a total of eight FOIA requests relating to assessing damage to the Atchafalaya Basin caused by sedimentation from USACE's water diversion projects or plans and permits for similar projects in the basin. The groups filed suit after the agency failed to conduct searches for most requests. The agency argued that it had conducted adequate searches for each request, although occasionally responsive records did not exist. Judge Jay Zaney first addressed two requests for records related to specific permit numbers. Although Atchafalaya's attorney claimed that more records should exist as to one of the requests, Zaney noted that "however, the question the Court must decide is whether the search performed was legally adequate, not whether other documents exist that were not located in the search. And the Court finds USACE has met its burden of establishing that it concluded a legally adequate search for the East Grand Lake Request." Turning to the other request, which concerned the Bayou Bridge Pipeline, Zaney found the agency had not yet shown that its search was adequate. Zaney explained that "the Court finds that USACE has not met its burden of establishing that it conducted a legally adequate search for the Bayou Bridge Request. Although the employee who searched for responsive records was identified in [the agency's declaration], the declaration lacks details about how his searches were conducted or what specific resources were searched." Zaney faulted USACE's no records response to a request for a project that had not yet been commenced. He pointed out that "regardless of whether the project was in process or not, there should have been searches conducted for the permit undergirding the project." While accepting the agency's searches for several requests concerning Buffalo Cove, Zaney rejected one search description that he found insufficiently detailed, which stated only that the FOIA contact had "received responsive records." Zaney pointed out that "this is the extent of the description of [the employee's] search. Accordingly, because the Court is unable to evaluate the adequacy of USACE's search for documents responsive to the December 2020 Request, the Court denies USACE's Motion for Summary Judgment as to this search." Zaney ordered the agency to provide further details within 60 days. Zaney also rejected the plaintiffs' claim that USACE had a **policy or practice** of violating FOIA by not abiding by the statutory time limits. Instead, he noted that "here, there is little beyond the delays themselves that signals that USACE's conduct in this case does not amount to the sort of bad faith conduct and had not incurred the sorts of prolonged delays that would entitle Plaintiffs to either declaratory or injunctive relief to an alleged policy or practice." (*Atchafalaya Basinkeeper, Inc., et al.*, Civil Action No. 21-317, U.S. District Court for the Eastern District of Louisiana, Jan. 25)

Judge James Boasberg has ruled that documentary filmmaker Kohl Harrington is not entitled to a summary judgment requiring the FDA to respond to his multiple FOIA requests for records on pet food that were submitted to the Center for Veterinary Medicine. While Harrington had bombarded CVM with more than 20 FOIA requests, his summary judgment motion concerned the two remaining requests from a series of eight requests he had submitted in the spring of 2020. In the process of responding to Harrington's eight requests, CVM processed and produced more than 7,000 pages and a number of videos. Boasberg noted that Harrington had not filed any substantive motion opposing the agency's proposal to pause processing of the remaining requests for 60 days to allow CVM to shift its limited resources to concentrate on completing the two outstanding requests, a process CVM estimated would be completed in March 2023. Boasberg began his

analysis by noting that "the issue for the Court to decide is simple: is FDA's timeline for processing Harrington's FOIA requests reasonable? For two independent reasons, the answer is yes." He explained that "first, by opting not to file a reply and not addressing the issue in his Motion, the Court may treat the Plaintiff as conceding any objection to FDA's proposed production schedule." Continuing, Boasberg noted that "second, even if Plaintiff had properly objected to FDA's timeline, the agency has the better argument on the merits. While courts in this district have exercised that discretion in somewhat different ways depending on the facts and posture of the case, they have largely coalesced around the proper considerations that inform a reasonable determination. . .For instance, courts have looked to the volume of requests an agency faces, how much requests to the agency have increased in recent years, the resources and capacity of the agency, other FOIA litigation in which the agency is involved, the agency's release policies, and how ordering swifter production would affect other FOIA requesters patiently waiting their turn." Boasberg indicated that "here, not only has FDA already fulfilled six of Harrington's eight requests, but he has himself to blame for the remaining production schedule: to promptly obtain the outstanding records, all he needs to do is ask the agency to shift its resources. Against this backdrop, it is reasonable for FDA to ask Plaintiff to choose how he wishes his various requests to be prioritized. If that were not the case, a single requester could hobble an agency and stymie all other FOIA requesters, all without satisfying the statutory criteria for expedited processing." Boasberg concluded that "in sum, even if Plaintiff is correct that FDA did not make a timely 'determination' – which does not require an agency to 'actually produce the documents within the relevant time period' – he has not put forth any compelling reason to conclude that FDA's proposed production schedule is unlawful." (*Harrington v. Food and Drug Administration*, Civil Action No. 20-1895 (JEB), U.S. District Court for the District of Columbia, Jan. 20)

A federal court in Missouri has ruled that Bryan Sheppard is **entitled to attorney's fees** for his litigation against the Department of Justice for records concerning the investigation into governmental misconduct during the investigation and prosecution of a 1988 fire that killed six Kansas City firefighters. Judge Nanette Laughrey agreed with DOJ that several entries were too vague to qualify and dismissed a total of 2.6 hours, totaling $897. DOJ questioned the time Sheppard's attorneys spent interviewing Kansas City *Star* reporter Mike McGraw, whose earlier series on the fire investigation had prompted Sheppard's interest. Laughrey approved of all the time spent with McGraw, noting that "it is reasonable that Mr. Sheppard's counsel spent time working with, and learning from Mr. McGraw, who submitted a substantially similar – if not identical – FOIA request, and wrote numerous articles about the 1988 Arson, leading up to DOJ's review. At bottom, Mr. Sheppard's counsel spent a reasonable amount of time working with Mr. McGraw; and this work was done in furtherance of Mr. Sheppard's FOIA request, and, ultimately, this litigation." Laughrey also agreed that time spent talking to other DOJ components – such as the Bureau of Alcohol, Tobacco and Firearms and the Office of the Inspector General – were appropriate charges. She noted that "the Court will not exclude these time entries. Mr. Sheppard's attorneys do not attempt to recover for work on unrelated FOIA requests submitted to different DOJ components. To the contrary, this Court, in this case, directed the DOJ to search for and produce records responsive to Mr. Sheppard's FOIA requests in other DOJ components outside of the Criminal Division. The DOJ itself recognized that fact and, indeed, for a time, provided regular status updates to the Court on search efforts taking place at both the OIG and ATF. Accordingly, work done by Mr. Sheppard's attorneys to analyze productions from and correspondence with other DOJ components was related to this litigation, reasonably expended, and compensable." DOJ argued that Sheppard should not be compensated for reviewing the agency's *Vaughn* index. However, Laughrey indicated that "here, the parties engaged in a protracted, multi-year dispute regarding the sufficiency of the DOJ's search efforts and the appropriateness of the DOJ's decision to withhold certain documents. The expenditures of time and money made for Mr. Sheppard to litigate this FOIA dispute were far from the typical ones made by FOIA requestors." She added that "to file his response, Mr. Sheppard had to review the additional documents produced by the DOJ and the newly filed *Vaughn* index to determine whether DOJ complied with the Court's orders."

However, Laughrey found the 215 hours claimed for writing his complaint was excessive, reducing it by more than $72,000. DOJ argued that while it withheld 615 pages, Sheppard only successfully challenged 58 withholding claims. However, Laughrey pointed out that Sheppard only challenged 80 withholdings and succeeded in winning 58 of those. Laughrey noted that "while Mr. Sheppard failed to receive every document for which he mounted a legal challenge, he succeeded in obtaining most of them." Laughrey reduced Sheppard's original fee request of $444,314 to $344,122.30. (*Bryan E. Sheppard v. United States Department of Justice*, Civil Action No. 17-1037-NKL, U.S. District Court for the Western District of Missouri, Jan. 25)

A federal court in California has ruled that Younes Yassein failed to **state a claim** that would allow the Department of Justice to search for records in response to his request. Yassein claimed that he had been stopped by Law Enforcement Officer Mike Miller of Colorado, who had run Yasein's name through the El Paso Intelligence Center and found out that he had an open DEA charge pending against him. Yassein submitted a FOIA request to the El Paso Intelligence Center for records showing that such a charge existed. The agency argued that the request did not reasonably describe searchable records. The agency referred the request to DEA. DEA contacted Yassein for clarification but did not hear back from him. Judge Gonzalo Curiel explained that "the Ninth Circuit recently held that a requestor *must* exhaust his administrative remedies under FOIA, including administrative appeal, so long as an agency properly responds before suit is filed – even if that response is after the 20 business days allotted by the statute. Here, the agency's August 3 letter does two things: makes a good faith effort to assist Plaintiff in satisfying the requirement of reasonable description and provides Plaintiff with the information necessary to complete an administrative appeal." Curiel added that "the letter's attempt to clarify the request tips the scales in favor of the Defendants. Defendants have provided evidence that they responded prior to the initiation of Plaintiff's suit on August 30, 2021. And despite Plaintiff's assertion that 'Defendants did not respond until they were sued,' Plaintiff has not provided any evidence to support this claim or rebut Defendant's showing. A stated assertion in opposition briefing alone is not evidence. Nor has Plaintiff provided any evidence that he filed an administrative appeal or otherwise administratively exhausted according to the procedure laid out by Defendants in the August 3 letter. Without such an appeal, Plaintiff's lawsuit is premature and summary judgment for the Defendants is proper." Curiel indicated that "even assuming *arguendo* that Plaintiff had received Defendants' letter requesting clarification *after* the initiation of Plaintiff's suit, thus constructively satisfying administrative exhaustion, the question remains whether Plaintiff's FOIA request was too deficient to properly trigger the agency's duty to respond. Upon review of Plaintiff's FOIA request, the Court concludes that it is indeed too vague so that it does not 'reasonably describe' records being sought, therefore failing to meet the requirements of a proper FOIA request." Curiel noted that "Plaintiff never actually asks for any kind of record. Instead, the FOIA request reads like an attempt to charge 'Mike Miller' with a crime. The request does not include the date of the incident that the requested information describes, nor does it provide even an approximate timeframe, year, or location that would allow the agency to locate the record with a reasonable amount of effort. The only identifier in the request is that it involves a 'law enforcement officer' named 'Mike Miller' in Colorado. This lack of information forces Defendant to engage in 'quite a bit of guesswork' in order to identify what records are sought." (*Younes Yassein v. El Paso Intelligence Center, et al.*, Civil Action No. 21-1530-GPC, U.S. District Court for the Southern District of California, Jan. 26)

The Supreme Court has rejected former President Donald Trump's appeal of the D.C. Circuit's decision to allow disclosure of potentially privileged records to Congress for use in the investigation of the Jan. 6, 2021, insurrection because the privilege had been waived by the current President Joe Biden, concluding that Trump would not have an executive privilege claim even if he were still the incumbent President. While Justice Clarence Thomas was the only Justice to vote to hear the case, Justice Brett

Kavanaugh also issued a statement indicating that he thought the issue of whether a former President retained some privilege claim as to the records of his administration was important enough that the Supreme Court should address it. Kavanaugh indicated that he disagreed with the ruling of the D.C. Circuit finding that Trump had no cognizable privilege claim. He pointed out that "a former President must be able to successfully invoke the Presidential communications privilege for communications that occurred during his Presidency, even if the current President does not support the privilege claim. Concluding otherwise would eviscerate the executive privilege for Presidential communications." Kavanaugh observed that "if Presidents and their advisors thought that the privilege's protections would terminate at the end of the Presidency and that their privileged communications could be disclosed when the President left office (or were subject to the absolute control of a subsequent President who could be a political opponent of a former President), the consequences for the Presidency would be severe. Without sufficient assurances of *continuing* confidentiality, Presidents and their advisors would be chilled from engaging in the full and frank deliberations upon which effective discharge of the President's duties depends." (*Donald J. Trump v. Bennie G. Thompson*, No. 21A272, U.S. Supreme Court, Jan. 19)

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