

EXHIBIT C



Jeff Dubner <jdubner@democracyforward.org>

Re: DOC-CEN-2021-000211

Jeff Dubner <jdubner@democracyforward.org>
To: census.foia@census.gov, Sarabeth.Rodriguez@census.gov
Cc: Aman George <ageorge@democracyforward.org>

Mon, Jan 4, 2021 at 6:35 PM

Dear Ms. Rodriguez and Mr. Reid,

I write in response to your letter of December 17 regarding FOIA matter DOC-CEN-2021-000211. Respectfully, we do not agree that our request is "wide-ranging" and fails to "reasonably describe the records sought." Our request is simple: any email in a single official's email box that contains any one of 14 specified terms. This is a narrow and easily administered request of a type that is routinely carried out under FOIA by every agency.

To the extent that you request that we identify "E-mail addresses of external persons for the To, From or CC email boxes of the records [we] are seeking to obtain," we decline to do so. Neither FOIA, the Department of Commerce's implementing regulations, nor any caselaw requires that we restrict our search in this fashion, particularly as we have already limited our request to *only* emails that were sent to or from (including cc and bcc) a single official. It is unreasonable to expect us to know every person with whom the official in question is corresponding about these topics, let alone their specific email addresses.

To the extent that your search returns a number of documents that you believe is burdensome or will take a significant amount of time to review, we would be happy to discuss ways to narrow or prioritize the search. For example, if you believe there are particular email correspondents who can be removed from the review, we would be happy to consider those names. But without any specific information as to why you believe the request will return an unduly large number of documents, we are not prepared to limit our request in the manner you propose.

Please contact me as soon as possible if you intend to maintain your current position, so that we can determine whether to seek judicial relief. I am available at your convenience to discuss our request and any reasonable measures that might reduce any burden on the Bureau. You can reach me by email or at 978-857-8468.

Regards,
Jeff

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