

## **EXHIBIT C**

*Legal Counsel.*

DINSMORE & SHOHL LLP  
801 Pennsylvania Ave., N.W. ^ Suite 610  
Washington, D.C. 20004  
www.dinsmore.com

Reed D. Rubinstein  
(202) 372-9120 (direct)  
reed.rubinstein@dinsmore.com

Dinsm<sup>o</sup>re

August 2, 2016

**VIA FACSIMILE, ELECTRONIC MAIL AND U.S. MAIL**

Dionne Hardy, FOIA Officer  
Office of Management and Budget  
725 17th Street, NW, Room 9026  
Washington, DC 20503  
Fax: 202.395.3504  
OMBFOIA@omb.eop.gov

**Re: AMERICAN CENTER FOR EQUITABLE TREATMENT, INC'S FREEDOM OF INFORMATION ACT REQUEST**

Dear Ms. Hardy:

On behalf of our client, the American Center for Equitable Treatment, Inc., a 501(c)(3) corporation, and as required by the Freedom of Information Act (FOIA), 5 U.S.C. § 552 and 5 CFR Part 1303, please provide me with the following records.

1. All records referencing or concerning the implementation of 44 U.S.C. § 3517(b) of the Paperwork Reduction Act, the regulation at 5 C.F.R. § 1320.14(c), and implementing guidelines (if any), including but not limited to procedures and assignment of responsibilities for processing and deciding petitions thereunder. Federal Register notices are excluded from this request.

2. Copies of all petitions submitted to OMB under 44 U.S.C. § 3517(b) or 5 C.F.R. § 1320.14(c), and all records referencing or concerning such petitions, included but not limited to OMB communications with the petitioners and OMB decisions on such petitions.

"Records" are defined at 44 U.S.C. § 3301, and per 5 U.S.C. § 552(f)(2) include "any information that would be an agency record subject to the requirements of [FOIA] when maintained by an agency in any format, including an electronic format." To be

Ms. Dionne Hardy  
August 2, 2016  
Page 2

clear, our request also includes metadata as well as records that may have been created, handled, transmitted, or found on private, nongovernmental email accounts.

The terms "and" and "or" shall be construed both conjunctively and disjunctively.

Relevant search terms include: "44 U.S.C. 3517", "44 U.S.C. 3517(b)", 5 C.F.R. 1320.14(c)", "petition", "Notice of Action", "burden", "control number", "exemption", "ICR or information collection request", "information collection" or "collection of information", "PRA or Paperwork Reduction Act", "paperwork burden", "supporting statement", "Terms of Clearance",

The relevant time is May 22, 1995, to the present.

On behalf of our client, we request a public interest fee waiver because the requested records directly concern and bear upon the regularity of the government's operations and activities, will be highly informative to the general public regarding OMB's policies and execution of its statutory obligations to minimize regulatory burden on the public, and contribute significantly to public understanding of bureaucratic and political interagency process. Upon receipt, our client will make these records publically available on its website for use by journalists, scholars, students, and interested members of the public at no charge.

Nevertheless, without waiving our client's right to appeal a fee waiver denial, we hereby authorize you to supply records responsive to this request without informing me of cost if the fees do not exceed \$500.00, which we agree to pay. Please be sure to contact me if the fees will exceed that amount and to arrange for record delivery.

I may be reached at either 202-372-9120 or reed.rubinstein@dinsmore.com if you have any questions.

Best regards,



Reed D. Rubinstein

RDR:um

**Malhotra, Upasana**

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**From:** FN-OMB-FOIA [OMBFOIA@omb.eop.gov]  
**Sent:** Tuesday, August 09, 2016 3:38 PM  
**To:** Rubinstein, Reed  
**Subject:** RE: OMB FOIA - American Center for Equitable Treatment, Inc. 8-2-16

Hi: This email acknowledges receipt of your Freedom of Information Act (FOIA) request to the Office of Management and Budget (OMB) dated August 2, 2016, and received in OMB's FOIA office on August 9, 2016. Your request has been logged in and is being processed. For your reference, the OMB FOIA number is 16-127.

Thank you,  
Dionne Hardy

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**From:** Rubinstein, Reed [Reed.Rubinstein@DINSMORE.COM]  
**Sent:** Tuesday, August 02, 2016 11:28 AM  
**To:** FN-OMB-FOIA  
**Subject:** OMB FOIA - American Center for Equitable Treatment, Inc. 8-2-16

Dear Ms. Hardy,

Attached is a FOIA request by our client, the American Center for Equitable Treatment, Inc. (ACET). A copy of this request will be faxed to you as well. Please be sure to identify and treat ACET as the requestor on all subsequent correspondence and communications.

Feel free to contact me if you have any questions.

Cordially,

**Dinsmore**

**Reed D. Rubinstein**  
Partner

Dinsmore & Shohl LLP • Legal Counsel  
801 Pennsylvania Avenue, N.W.  
Suite 610  
Washington, DC 20004  
T (202) 372-9120 • F (202) 372-9141  
E reed.rubinstein@dinsmore.com • dinsmore.com

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