

# **EXHIBIT N**



**UNITED STATES DEPARTMENT OF COMMERCE**  
**Chief Financial Officer and**  
**Assistant Secretary for Administration**  
Washington, D.C. 20230

March 27, 2018

Jamila Benkato  
The Protect Democracy Project  
2020 Pennsylvania Avenue, NW  
Suite #163  
Washington, DC 20006

RE: Freedom of Information Act Request DOC-OS-2018-000982

Dear Ms. Benkato:

This letter is in response to your correspondence to the U.S. Department of Commerce's (Department) Freedom of Information Act (FOIA) Office. We are responding under the FOIA to your request for, among other things:

1. All records, including but not limited to emails, notes, and memoranda, reflecting communications between the Department of Commerce and the following individuals, or the Department of Commerce and employees or representatives of the following entities, discussing or otherwise relating to the inclusion of a citizenship question in the 2020 Census.

- a. Donald Trump for President;
- b. The Republican National Committee;
- c. America First Action;
- d. Great America;
- e. Future 45;
- f. Brad Parscale;
- g. Michael Glassner;
- h. John Pence;
- i. Steve Bannon;
- j. Breitbart; and,
- k. Fox News

2. All communications, including but not limited to emails, notes, and memoranda, between the Department of Commerce and the Executive Office of the President, reflecting, discussing, or otherwise relating to the determination of the questions for the 2020 Census, including but not limited to emails in which the domain eop.gov is in the email address in the to, from, cc, bcc, subject, or body fields of the email.

3. All records, including but not limited to emails, notes, and memoranda, reflecting, discussing, or otherwise relating to communications between the Department of Commerce and Thomas Brunell.

Pursuant to the 15 CFR, Section 4.4(c), records requested must be described in enough detail to enable Department personnel to locate them with a reasonable amount of effort. Unfortunately, we would have difficulty processing your request, referenced above, as it is written. In particular, we would have to conduct a Department-wide search and the aforementioned portion of your request is much too broad in the number of files we would have to search. As you may be aware, the Department is a large and diverse agency comprised of 14 bureaus and operating units and over 49,000 employees. We would have to search files and the email accounts of all of our employees. Additionally, many files are not maintained electronically and/or in central servers; therefore, in order to fully comply with your request, we would need to conduct a desk-by-desk search of over 49,000 Department employees. Such a search is simply unreasonable, impractical, and not possible within a reasonable timeframe.

We are more than happy to assist you with all parts of your request. However, as indicated above, limiting the scope of your request is needed in order to begin our search for records that may be responsive to your request. I would suggest that you review the following link -- <https://www.commerce.gov/directory/leadership> -- which identifies Department leadership. If you could specify certain members of the Department leadership team you think it likely to possess records of the type you seek, the time and cost of conducting the search might be significantly reduced.

Please let us know whether, and in what way, you would be willing to narrow the search, or contact us and we will be happy to work with you to narrow the scope. If necessary, for assistance, please feel free to contact me, Steven Gitelman, by email at [sgitelman@doc.gov](mailto:sgitelman@doc.gov). You may also contact our FOIA Public Liaison, Michael Toland, by telephone at (202) 482-3842 or by email at [efoia@doc.gov](mailto:efoia@doc.gov), or our office in writing at:

Department of Commerce  
Office of Privacy & Open Government  
RM 52010  
1401 Constitution Avenue NW  
Washington, DC 20230  
Attn: FOIA Public Liaison

If clarification of your request or other communication is not received within 30 calendar days from the date of this letter, your FOIA request will be closed with no further action on our part.

Sincerely,

A handwritten signature in black ink that reads "Steven Gitelman". The signature is written in a cursive style with a large initial 'S'.

Steven Gitelman  
FOIA/PA Analyst (Contractor)  
U.S. Department of Commerce  
Office of Privacy and  
Open Government