# **EXHIBIT 2**

Case 1.20-cv-03519 Document 2-2 Filed 12/03/20 Page 2 of 8 REVER Kacksonville, L. 32202 USA dison, WI 53703



# Department of the Treasury Internal Revenue Service Privacy, Governmental Liaison and Disclosure Centralized Processing Unit

Stop 93A PO Box 621506 Atlanta, GA 30362

David Armiak The Center for Media and Democracy 520 University Ave., Ste. 305 Madison, WI 53703 Date:

June 30, 2020

Employee name:

T. Jones

Employee ID number:

0571420

Telephone number:

904-661-3211

Fax number:

855-203-7004

Case number:

2020-03038

Re: Your Freedom of Information Act

Request

## Dear David Armiak

This is in response to your Freedom of Information Act (FOIA) request dated June 18, 2020, received in our office on June 18, 2020.

You asked for copies of exempt organization tax returns.

We have a routine agency procedure that should be used to request copies of exempt organization returns. I'm enclosing Form 4506-A, Request for Public Inspection or Copy of Exempt Organization IRS Form. As an alternative, you can visit the organization to inspect the return instead of requesting it from the IRS. Exempt organizations must make their returns available for public inspection.

26 CFR 601.702(d) provides that requests for records processed in accordance with routine agency procedures are specifically excluded from the processing requirements of FOIA.

If you would like to discuss our response, you have the right to contact the FOIA public liaison, Summer Sutherland, at:

801-620-2149

The FOIA public liaison responds to FOIA and Privacy Act requests for copies of documents maintained by the IRS. There is no provision in either Act to resolve tax, collection, or processing issues and our staff isn't trained to answer questions regarding those issues. If you need assistance with tax-related issues, you can call the IRS at 800-829-1040.

## Case 1:20-cv-03519 Document 2-2 Filed 12/03/20 Page 4 of 8

You can access forms and publications by calling 800-TAX-FORM (800-829-3676) or visiting www.irs.gov/formspubs.

If you have questions, you can contact the person at the telephone number at the top of this letter.

Sincerely, Phillip H. Hatcher

Hatcher Phillip Disclosure Manager
Disclosure Office 07

Enclosure: Form 4506-A

# Instructions for Form 4506-A



(Revised October 2018)

## Request for Public Inspection or Copy of Exempt or Political Organization IRS Form

Section references are to the Internal Revenue Code unless otherwise noted.

# **Future Developments**

For the latest information about developments related to Form 4506-A and its instructions, such as legislation enacted after this form and instructions were published, go to <a href="https://www.irs.gov/form4506">www.irs.gov/form4506</a>.

## What's New

Beginning December 2017, the Digital Data Request will use (USBs instead of DVDs).

## **General Instructions**

## **Purpose of Form**

Use Form 4506-A to request under section 6104:

- A copy of an exempt or political organization's return, report, notice, or exemption application, or
- An inspection of a return, report, notice, or exemption application at an IRS office.

You do not have to complete Form 4506-A to get copies of the following forms.

- Form 8871, Political Organization Notice of Section 527 Status, and Form 8872, Political Organization Report of Contributions and Expenditures, are available for inspection and printing from the Internet. The website address for both forms is <a href="https://www.irs.gov/polorgs">www.irs.gov/polorgs</a>.
- Exempt or political organizations must make their returns, reports, notices, and exempt applications available for public inspection. You can visit the organization to inspect the material instead of requesting it from the IRS. The organization may be able to mail the copies to you.
- You may request images of Form 990-N (e-Postcard), for Tax-Exempt Organizations Not Required to File Form 990 or 990-EZ, filings at www.irs.gov/app/ePostcard.
- The machine readable data for the efiled Forms 990, 990-EZ and 990-PF are available for download from Amazon Web Services (AWS). The website is <a href="https://www.aws.amazon.com/public-datasets/irs-990/">www.aws.amazon.com/public-datasets/irs-990/</a>.
- If you want to determine if charitable contributions are deductible, use Tax Exempt Organization Search, <a href="www.irs.gov/charities-non-profits/tax-exempt-organization-search">www.irs.gov/charities-non-profits/tax-exempt-organization-search</a>.



To see an organization's current activities or financial data, you can use <a href="www.guidestar.org">www.guidestar.org</a>.



An organization, or its officers, may request a copy of the organization's own return on Form 4506-A. However, they will only receive the copy that is "Open for Public Inspection." The publicly available copy will not

include, for example, information that may identify a contributor and documents that were filed with the return, but are not open to public inspection. An organization, or its officers, may request a complete copy of the organization's own return by completing Form 4506, Request for Copy of Tax Return, and paying the applicable fee.

## **Digital Data Request**

The IRS can provide copies of exempt organization returns on USB. Requesters can order the complete set (for example, all Forms 990 and 990-EZ or all Forms 990-PF filed for a year) or a partial set by state. If you are ordering a partial set on USB, indicate the state(s), and month(s) you are ordering. Sample digital data requests are not available for individual states. Digital data and sample digital data requests are not available for individual exempt organizations. Complete information, including the cost, is available on the IRS website. Search Copies of Scanned EO Returns Available at www.irs.gov/Charities-&-Non-Profits/Copies-of-Scanned-EO-Returns-Available:

#### **Format**

**Raw.** The digital data contain image files in Tag Image File (TIF) format for returns selected for the month or quarter requested. This format is best for users who intend to process the image files through their data software.

## **How Much Will It Cost?**

You may inspect a return, report, notice, or exemption application at an IRS office free of charge.

If you want a photocopy of a return, report, notice, or an exemption application, see the chart below.

**Note.** The IRS will send you a bill for the photocopy cost. If your cost is over \$250, we will ask for payment in advance.

IF you are	THEN the charge for paper copie is							
A commercial user	\$ .20 per page							
An educational institution, media, non-commercial scientific institution, or all other requesters	First 100 pages free, \$ .20 per page thereafter							

Digital data requests and sample digital data requests must be prepaid. Please include your payment with your request. Search Copies of Scanned EO Returns Available at <a href="https://www.irs.gov/">www.irs.gov/</a> Charities-&- Non-Profits/Copies-of-Scanned-EO-Returns-Available for the cost of digital data and sample digital data. A check or money order for the fee should be payable to "United States Treasury."

Reminder. Fees for digital data are updated in January of each processing year. Refer to IRS.gov to determine the required fee related to the processing year the request is submitted for. For example – Processing year 2018 DVD fees are updated January 2018.

## Where To File

Use the following chart to determine where to fax or mail (depending on the service needed) Form 4506-A. **Note**: To avoid delays, do not combine requests sent to different address on one Form 4506-A.

IF you want	THEN file Form 4506-A with the								
To inspect a return, report, notice, or exemption application at an IRS office*	Internal Revenue Service Centralized Processing Unit (CPU) – Stop 93A PO Box 621506 Atlanta, GA 30362-3006 Fax no. 877-891-6036 Note: Only one request per Fax								
A copy of an exemption application, Form 1023. Form 1023-EZ, Form 1024, Determination Letter, or updated Determination Letter (includes all supporting documents)	Internal Revenue Service Attn: Correspondence Unit P.O. Box 2508, Room 4024 Cincinnati, OH 45201 Fax no. 855-204-6184								
A copy of a return, report, or notice	Internal Revenue Service RAIVS Unit MS: 6716 Ogden, UT 84201 Fax no. 855-653-9144								

<sup>\*</sup>The office handling your request will contact you to schedule an appointment when the item is available for inspection.

## How Long Will It Take?

Generally, it may take up to 60 days for us to process your request.

# **Specific Instructions**

#### l ine

**Exempt or political organization.** Enter the organization's official name under which exempt status was approved, address, and employer identification number. If you do not enter the official name, we may not be able to locate the requested form. Complete a separate Form 4506-A for each organization.

### Line 2

**Requester.** Enter the requester's name, address, phone number, and the name of a contact person.

### Line 3

Category of requester. Check the appropriate category of the requester. You must check a box.

#### Line 4

Reason for request. To avoid being charged the commercial rate, all requesters except commercial users must provide a reason for requesting the records and explain how the records will be used.

### Lines 5-8

For each applicable form, check the box(es) for the item(s) you are requesting. You may request more than one form. For each form requested, check either the copy, inspection, DVD, or sample DVD box and enter the specific tax year(s) or period(s)

as indicated. If ordering a partial set on DVD or sample DVD, indicate the format, state(s), and month(s) requested. If ordering a sample DVD, check the sample DVD box, indicate the format, and write in the calendar year(s). Sample DVD requests are not available for individual states. Individual state DVDs are only available in Alchemy format.

#### Line 9

Check the box(es) for the item(s) you are requesting. You may request more than one item.

#### What we will send you

IF you check	THEN we will send you								
Exemption application	A copy of the most recently approved application for exemption submitted if the organization, along with all supporting documentation and the determination letter. This includes Form 1023, 1023-EZ, 1024, etc.								
	Note If the organization previously filed for exemption under a different subsection or was previously granted exemption, revoked, and then filed for reinstatement, you will only receive the most recent application by checking this box. If you would like previous applications, you must check the "other" box and indicate this in the space provided.								
Determination letter only	Only the determination letter that was issued as a result of the most recently approved exemption application (e.g. Form 1023, Form 1023-EZ, Form 1024, etc.)								
Affirmation letter	A letter with the current date affirming the current exempt status of the organization.								
Other	The specific items you request on the line provided or on an attachment. Use this box to request any other item(s) that is/are publicly disclosable Examples include, but are not limited to group exemption requests some requests made on Form 8940, and prior exemption applications.								
	Note Requests for these "other" documents take longer to process and could result in significant delays.								



Incomplete requests will be rejected

**Note.** Tax returns are generally available only for 7 years from filing before they are destroyed in accordance with applicable provisions of law.

Privacy Act and Paperwork Reduction Act Notice. We ask for the information on this form to carry out the Internal Revenue laws of the United States. We need the information to gain access to the return or other exempt or political organization IRS form you requested in our files and properly respond to your request

The authority to ask for the information requested on this form is section 6104 and its regulations. You are not required to provide the information requested on this form. However, if you do not furnish the information, we may not be able to fulfil your request. Providing willfully false or fraudulent information may subject you to criminal penalties. Routine uses include disclosing the information to the Department of Justice for civil or criminal litigation. We may also disclose this information to federal and state agencies to enforce federal nontax criminal laws and to federal law enforcement and intelligence agencies to combat terrorism.

You are not required to provide the information requested on a form that is subject to the Paperwork Reduction Act unless the form displays a valid OMB control number. Books or records relating to a form or its instructions must be retained as long as their contents may become material in the administration of any Internal Revenue law. Generally, tax returns and return information are confidential, as required by section 6103. The time needed to complete and file Form 4506-A will vary depending on individual circumstances. The estimated average time is:

Recordkeeping					•			•	•		•	•	•	6 min.
Learning about the law or the form														
Preparing the form														
Copying, assembling, and sending	the	e f	orı	n i	to	the	e II	RS	•	•	٠.			20 min.

If you have comments concerning the accuracy of these time estimates or suggestions for making Form 4506-A simpler, we would be happy to hear from you. You can send us comments by going to <a href="www.irs.gov/formspubs/">www.irs.gov/formspubs/</a>, clicking on "More Information," and then clicking on "Give us feedback." You can also send your comments to:

Internal Revenue Service
Tax Forms and Publications Division
1111 Constitution Ave. NW, IR-6526
Washington, DC 20224

**Do not** send Form 4506-A to this address. Instead, see *Where To File*.

# Form 4506-A

(October 2018)

Department of the Treasury Internal Revenue Service

# Request for Public Inspection or Copy of Exempt or Political Organization IRS Form

Type or print clearly. Request may be rejected if the form is incomplete or illegible.
 Information about Form 4506-A and its separate instructions is at www.irs.gov/form4506.

OMB No. 1545-0495



You may not have to complete Form 4506-A to get the copies you need.

- Internet. Form 8871, Political Organization Notice of Section 527 Status, and Form 8872, Political Organization Report of Contributions and Expenditures, are available for inspection from the Internet. The website address for both forms is www.irs.gov/polorgs.
- Public disclosure by the organization. Exempt or political organizations must make their returns, reports, notices, and exempt applications
  available for public inspection. You can visit the organization to inspect the material instead of requesting it from the IRS. The organization may be
  able to mail the copies to you.
- Form 990-N (e-Postcard) annual electronic notice is available for inspection on IRS.gov using Tax Exempt Organization Search (see instructions).
- Amazon Web Services (AWS). Efiled Forms 990, 990-EZ and 990-PF are available on AWS in a machine readable format. Exempt or political organization. Complete a separate Form 4506-A for each organization. Employer identification number Address City or town, state or province, country, and ZIP or foreign postal code 2 Requester Name Contact person Address Phone City or town, state or province, country, and ZIP or foreign postal code Date Category of requester: Commercial user Non-commercial scientific institution You must check a box. All others Educational institution Reason for request. All requesters except for commercial users must provide an explanation of how the records will be used to avoid being charged the commercial rate. Attach additional sheets if necessary. Lines 5-8. For each applicable form, check the box(es) for the item(s) you are requesting. You may request more than one form. For each form requested, check either the copy, inspection, DVD, or Sample DVD box and enter the specific tax year(s), as indicated. If ordering a partial set on DVD or Sample DVD, indicate the format, state(s), and month(s) requested. Line 9. Check the box(es) for the item(s) you are requesting. You may request more than one item. If you check "other," you must indicate the specific item(s) you are requesting on the line provided or on an attachment. See instructions for more information. Note. DVD and Sample DVD are not available for individual exempt organizations. b Digital data request: Yearly Form 990, Form 990-EZ: Paper request: Copy Inspection Tax year(s) or period(s) requested: YYYYMM YYYYMM YYYYMM b Digital data request: Yearly Form 990-PF: Paper request: Copy Inspection Calendar year(s): Tax year(s) or period(s) requested: YYYYMM YYYYMM YYYYMM Form 990-T (501(c)(3) organizations filed after August 17, 2006): **b** Digital data request: Yearly Paper request: Copy Inspection Calendar year(s): Tax year(s) or period(s) requested: YYYYMM YYYYMM YYYYMM Form 5227 (for tax years beginning after December 31, 2006): Application for exemption (Form 1023, 1023-EZ, Form 1024, etc.) Paper request: Copy Inspection Tax year(s) or period(s) requested: Exemption determination letter only YYYYMM YYYYMM YYYYMM ☐ Affirmation letter Other **IRS Use Only** The form requested above was inspected by (name of requester) IRS office where inspection was made

Date

Signature of employee present at inspection