

Mayor's Office of Legal Counsel

FOIA Webinar

**EFFECTIVELY MANAGING THE
FREEDOM OF INFORMATION
ACT PROCESS**

Presented by:
Niquelle Allen, Esq.
Director
Office of Open Government
November 17, 2020

Presentation Contents

- Introduction to FOIA
- Responding to FOIA Requests
- Conducting Searches for Records
- Producing Records
- Decision Letters

INTRODUCTION

THE DISTRICT OF COLUMBIA FREEDOM OF INFORMATION ACT

- The DC Freedom of Information Act (FOIA) is a DC law that gives the public the right to access information from the District of Columbia Government.
- Under DC FOIA, DC government must release information that is requested, unless that information is protected from disclosure.

INTRODUCTION

- The D.C. Freedom of Information Act (FOIA) also requires that DC agencies proactively provide certain information without a FOIA request.
- DC law requires that the information is available upon request and online and listed on the agency's website under the "FOIA" tab.
- DC government has also proactively released hundreds of datasets, available on **opendata.dc.gov**. **CHECK HERE FIRST**

**Office of Open
Government
Board of
Ethics &
Government
Accountability**

- The DC Office of Open Government (the “OOG”) advises the entire District government on FOIA.
- The Director of the DC Office of Open Government may issue Advisory Opinions on FOIA issues upon request or sua sponte.
- The DC Office of Open Government also serves as an advocate to ensure the FOIA process is fair and executed properly.

About the OOG

- The OOG is responsible for training public bodies on the requirements of FOIA.
- The OOG also assists members of the public in filing FOIA requests with the requisite public agency.

FOIA Who's Who

DC FOIA MANAGEMENT

- There is no central body within DC government that handles FOIA requests. Instead, each D.C. agency processes its own records. The primary point of contact for DC FOIA is the agency FOIA Officer or the Agency Director.
- The DC Mayor's Office of Legal Counsel handles FOIA Appeals and the DC Office of the Attorney General (OAG) handles FOIA litigation through its Civil Litigation Division and also provides FOIA advice through its Legal Counsel Division.

FOIA Who's Who

DC FOIA MANAGEMENT

- The Mayor of the District of Columbia has also created the District of Columbia “Open Government Advisory Group”
- The Open Government Advisory Group advises the Mayor on FOIA and other open government and transparency issues. The group includes subject matter experts from the government and members of the public with expertise in open government.

AGENCY RESPONSIBILITY

- Each agency head must designate an individual as its FOIA Officer.
- Each agency must post on its website the name, title, address, telephone number, and email address of its designated FOIA officer.

(1 DCMR §§ 401.2 - 401.3)

Who May Request Records

- **ANY** person has a right to inspect, and at his/her/their discretion, to copy **ANY** public record of a public body except as expressly provided by the FOIA exceptions. (D.C. Official Code § 2-532(a)).

Includes records of some contractors

- This includes **ANY** record produced or collected pursuant to a contract with a private contractor to perform a public function. D.C. Official Code § 2-532(a-3)).

AVAILABLE without a FOIA request

Records that must be available to the public without the need of a FOIA request include:

- Employee's salary, title and employment dates;
- Contracts expenditures;
- Budgets;
- Manuals;
- Policies;
- Rules;
- Opinions;
- Orders; and
- Meeting minutes of open proceedings of public bodies.

See (D.C. Official Code § 2-536)

PUBLIC RECORDS

- Includes all books, papers, maps, photographs, cards, tapes, recordings, vote data (including ballot-definition material, raw data, and ballot images), or other documentary materials, regardless of physical form or characteristics prepared, owned, used, in the possession of, or retained by a public body.
- Public records include information stored in an electronic format (D.C. Official Code § 2-502(18)).

How requests may be submitted

- A request for a record of an agency may be made orally or in writing and must be directed to the particular agency (1 DCMR § 402.1).
- A requester may be asked to submit in writing a request for records (1 DCMR § 402.2).
- Requests may be mailed, faxed or e-mailed (1 DCMR § 402.3).



[This Photo](#) by Unknown Author is
licensed under [CC BY-SA](#)

APPLICABLE REGULATIONS

- 1 DCMR § 400 et. seq. contains the rules and procedures to be followed by ALL agencies, offices, and departments of the District of Columbia, and ALL persons requesting records pursuant to FOIA.

The
FOIA
request
must
BE
specific

- A request must reasonably describe the desired record(s). If possible, specific information regarding names, places, events, subjects, dates, files, titles, file designation, or other identifying information shall be supplied (1 DCMR § 402.4).

RESPONDING TO FOIA REQUESTS

EFFECTIVELY MANAGING THE FOIA
PROCESS

RESPONDING TO FOIA REQUESTS

DC FOIA PROCESS

When an agency FOIA officer receives a FOIA request, the FOIA Officer should acknowledge receipt of the request via email message or other initial communication to a FOIA Requester.

DC has an automated system, **FOIAXpress**, that the public may use to make FOIA requests and DC agencies may use to process FOIA requests. The system automates the DC FOIA process.

RESPONDING TO FOIA REQUESTS

An initial response typically includes: an introduction; acknowledgement; any clarifying questions (if needed); a discussion of fees (if possible); processing track designation (if possible); contact information for questions; a complimentary close (for example, “Sincerely”); a written signature; and a typed name, agency, and your title.

RESPONDING TO FOIA REQUESTS

RESPONSE TIMING UNDER DC FOIA

For records other than body-worn camera recordings: **15** business days.
[D.C. Official Code § 2-532(c)(1)]



For body-worn camera recordings: **25** business days.
(5 calendar days in certain instances) [D.C. Official Code § 2-532(c)(2)(A)]



RESPONDING TO FOIA REQUESTS

EXTENDING THE TIME TO RESPOND

In *unusual circumstances*, the agency may invoke an additional 10-day extension by written notice to the requester setting forth the reasons for extension and expected date for the determination (D.C. Official Code § 2-532(d-1)).

WHAT IS AN UNUSUAL CIRCUMSTANCE?

Unusual circumstances are defined in D.C. Official Code § 2-532(d)(2) as:

- (A) The need to search for, collect, and appropriately examine a **voluminous amount of separate and distinct records** that are demanded in a single request;
- (B) The **need for consultation**, which shall be conducted with all practicable speed, with **another public body** having a substantial interest in the determination of the request or among 2 or more components of a public body having substantial subject-matter interest therein; or

WHAT IS AN UNUSUAL CIRCUMSTANCE? (CONTINUED)

(C) For body-worn camera recordings covered by subsection (c)(2) of this section, the inability to procure a vendor that is able to perform the redactions within the 25-day time period provided provided under subsection (c)(2) of this section.

WHAT IS THE CONSEQUENCE OF NOT RESPONDING TO A FOIA REQUEST ON TIME?

- D.C. Official Code 2-532(e) provides that failure to timely respond to a FOIA request is **deemed a denial** of the request.
- A requester can appeal the denial to the Mayor or to Superior Court. [D.C. Official Code § 2-537; 1 DCMR 412.1.]



WHAT IF I RECEIVE A REQUEST THAT IS OVERLY BROAD?

- 1 DCMR 402.4 provides that: “A request shall reasonably describe the desired record(s). Where possible, specific information regarding names, places, events, subjects, dates files, titles, file designation, or other identifying information shall be supplied.”



WHAT IF I RECEIVE A REQUEST THAT IS OVERLY BROAD?



This Photo by Unknown
Author is licensed under
[CC BY-NC](#)

- 1 DCMR 402.5 states: “Where the information supplied by the requester is not sufficient to permit the identification and location of the record by the agency without an unreasonable amount of effort, the requester shall be contacted and asked to supplement the request with the necessary information. Every reasonable effort shall be made by the agency to assist in the identification and location of requested records.”

HOW DOES IT IMPACT MY DEADLINE IF A REQUESTER REFINES THE SEARCH?

- 1 DCMR 405.6 provides that “. . . a request is deemed received when the designated Freedom of Information Officer, or agency head in the absence of a designated Freedom of Information Officer, receives the request submitted in compliance with the Act and this chapter.
- When the Freedom of Information Officer, pursuant to 402.5, contacts the requester for additional information, then the request is deemed received when the Freedom of Information Officer receives the additional information.”



WHAT IF THE REQUEST I RECEIVE IS OVERLY BURDENSOME?

- Under DC FOIA, there is no authority to treat as void requests that the District believes are overly **burdensome**. *Fraternal Order of Police, Metro. Police Labor Comm. v. District of Columbia*, 139 A.3d 853, 862-64 (D.C. 2016)



SEARCHING FOR RECORDS

Effectively managing the
FOIA process



Involves all who maintain records

- All agency employees who maintain records must assist the designated Freedom of Information officer, as appropriate, with the identification and search of responsive records (1 DCMR § 401.5).

ADEQUATE SEARCH FOR RECORDS

- In assessing whether a District agency conducted an adequate search in response to a FOIA request, courts look not to “the fruits of the search,” but to the **“appropriateness of the methods used to carry out the search.”** The issue to be resolved is not whether there might exist any other documents possibly responsive to the request, but whether the search for those documents was adequate. *Iturralde v. Comptroller of Currency*, 315 F.3d 311 (D.C. Cir. 2003)

HOW DO I CONDUCT AN ADEQUATE SEARCH

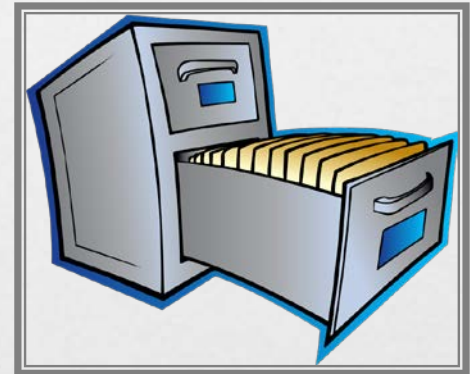
- An agency's search conducted in response to a FOIA request "need not be perfect, only adequate," and adequacy is measured by the **reasonableness of the effort in light of the specific request.** *Fraternal Order of Police, Metro. Police Labor Comm. v. District of Columbia*, 79 A.3d 347, 360 (D.C. 2013)
- The search must be "reasonably calculated to uncover all relevant documents." *Weisberg v. Dep't of Justice*, 745 F.2d 1476, 1485 (D.C. Cir. 1984), quoting *Weisberg v. Dep't of Justice*, 705 F.2d 1344, 1350-51 (D.C. Cir. 1983).

AFFIDAVIT OF SEARCH FOR RECORDS

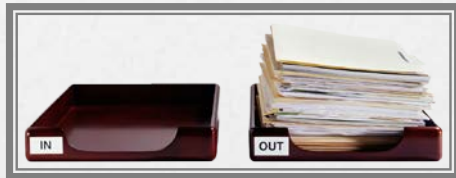
- When a requester challenges the adequacy of the agency's search (or, in litigation, when the District seeks summary judgment), the agency/District must establish beyond material doubt that it expended reasonable efforts to uncover all relevant documents by **setting forth sufficient information in its affidavits for a court to determine if the search was adequate.** *Nation Magazine, Washington Bureau v. U.S. Customs Serv.*, 71 F.3d 855, 890 (D.C. Cir. 1995)
- The agency FOIA officer should, as a matter of business practice, create an affidavit that describes the agency's search for records.

WHAT SHOULD MY AFFIDAVIT INCLUDE?

- Provide **context** for the request. Describe the structure of the agency's file or record-keeping system (electronic and/or paper, as applicable to the request).
 - Does the agency have a retention policy?
 - Was a search conducted even if the retention policy called for the disposal of the record?



WHAT SHOULD THE AFFIDAVIT DESCRIBE?



- An agency must “describe at least generally the structure of the agency’s file system which makes further search difficult.” *Church of Scientology of Cal. v IRS*, 792 F.2d 146, 151 (D.C. Cir. 1986)

WHAT ELSE SHOULD MY AFFIDAVIT INCLUDE?

- Explain how the agency's search was reasonably calculated to uncover all relevant documents.
- Detail both how the search was conducted and why it was conducted in that manner.
- If only one system is searched, make it clear that this system was the only possible place that responsive records were likely to be located.



E-MAIL SEARCHES

How do I conduct an adequate search?



This Photo by Unknown Author is licensed under CC BY-SA-NC

- “We do not know and cannot simply assume, in this age of computerized connectivity, **that it would be unreasonable for [the agency’s] FOIA officer to search all of [the agency’s] email accounts**, regardless of how many accounts that might be.” *Fraternal Order of Police, Metro. Police Labor Comm. v. District of Columbia*, 139 A.3d 853, 866(D.C. 2016).

SEARCHING FOR RECORDS

What should my affidavit include for *email searches*?

- For requests for involving email searches, explain how many email accounts exist and what the agency and/or OCTO's capacity is in terms of searching them.
- Consider having OCTO submit an affidavit/declaration detailing where and how it searched for responsive records. If it's unreasonable for OCTO to conduct searches of all (or a large number of) email accounts, OCTO must explain why.



Fees

- Make sure that each person assisting with the search for records keeps a log or other documentation of the time spent searching for records.
- Agencies may charge fees for conducting record searches and producing records in response to a FOIA request.
- There is no fee to submit a FOIA request. However, you may require a requester to pay fees in advance, if they have not unpaid past FOIA-related fees.
- May grant a public interest waiver of fees.

Examples of Fees

- Searching for records/Review of Records: Hourly rate based on the pay grade of the personnel who performs the search.
- Photocopies: \$0.25 per page.
- Document certification: \$1.00 per document to certify a document as true copy of an agency record.
- The direct cost of any service or material for which no fee has been established.
- A Requester may have to pay search and/or review fees even if the search does not locate any responsive records or if records are located but are withheld as exempt. *See* DC Official Code § 2-532 and 1 DCMR § 408.

PRODUCING THE RECORDS

Effectively managing the
FOIA process



FOIA EXEMPTIONS

DOCUMENTS EXCLUDED FROM
DISCLOSURE REQUIREMENTS

FOIA Exemptions

CATEGORIES OF EXEMPTIONS

The exemptions under the D.C. Act are patterned on and have been construed in accordance with federal law. *See Barry v. Washington Post Co.*, 529 A.2d at 321



EXEMPTION 1

TRADE SECRETS

- (1) Trade secrets and commercial or financial information obtained from outside the government, to the extent that disclosure would result in substantial harm to the competitive position of the person from whom the information was obtained.

EXEMPTION 2

PERSONAL PRIVACY

- (2) Personal privacy: Information of a personal nature where the public disclosure thereof would constitute a clearly unwarranted invasion of personal privacy.

Personal Privacy Exception Balancing Test

The FOIA Officer must perform a balancing test under this exemption: the individual's privacy interest in the material at issue must be balanced against the public interest in disclosing it, and this public interest must serve the "core purpose of shedding light on an agency's performance of its statutory duties."

Privacy Exemption Balancing Test Examples

In re Appeal of The Washington Post Co.

- The privacy interests of students and teachers under investigation for the consumption of alcohol substantially outweighs the public interest in their identifying information.

In re Appeal of Walter Thomas

- May disclose names, professional qualifications, and work experiences of successful job applicants, but refuse to disclose other private information, such as home telephone numbers and addresses, Social Security numbers, marital status and personal references, or any information regarding unsuccessful job applicants.

EXEMPTION 2A

BODY WORN CAMERAS

- Any body-worn camera recordings recorded by the Metropolitan Police Department:
 - (A) Inside a personal residence; or
 - (B) Related to an incident involving domestic violence, stalking or sexual assault as defined by the D.C. Code.

EXEMPTION 3

LAW ENFORCEMENT

- (3) Investigatory records compiled for law enforcement purposes including records of Council investigations and investigations conducted by the Office of Police Complaints.
- Disclose investigative techniques and procedures not generally known outside the government; or endanger the life or physical safety of law-enforcement personnel.

EXEMPTION 4

AGENCY COMMUNICATION

- Inter-agency or intra–agency memorandums or letter which would not be available by law to a party other an agency in litigation with the agency.

EXEMPTIONS 5 & 6

- **EXEMPTION #5**

Future examination test questions.

- **EXEMPTION #6**

Other statutes, cannot be a regulation. Information specifically exempted from disclosure by statute (other than FOIA), provided that such statute: requires that the matters be withheld from the public in such a manner as to leave no discretion on the issue; or establishes particular criteria for withholding or refers to particular types of matters to be withheld.



EXEMPTIONS 7-9

EXEMPTION #7

- National security matters under federal law.

EXEMPTION #8

- Antitrust investigations-D. C. Official Code § 28–4505.

EXEMPTION #9

- Arson Investigations- D.C. Official Code § 5–417.

EXEMPTIONS 10-12

EXEMPTION #10

- Emergency response plans.

EXEMPTION #11

- Social security and federal employer ID numbers; (D.C. Official Code § 47-2851.06).

EXEMPTION #12

- Whistleblowers, unless the name of the employee is already known. D.C. Official Code §§ 1-615.51; 2-233.01 *et seq.*

EXEMPTIONS 13-15

EXEMPTION #13

- Homeland security records, D.C. Official Code § 7-2271.04.

EXEMPTION #14

- Sealed criminal records, Chapter 8 of Title 16.

EXEMPTION #15

- Critical infrastructure (applies only to entities regulated by the Public Service Commission).

EXEMPTION 16

TEACHER EVALUATIONS

- Teacher evaluations D.C. Official Code § 38–2615(a).

LEGAL EXEMPTIONS

ATTORNEY WORK PRODUCT

- Applies to documents prepared by or for an attorney in anticipation of litigation, no matter the status or stage of the litigation.



LEGAL EXEMPTIONS

ATTORNEY-CLIENT PRIVILEGE

- Protects confidential communications between an attorney and client when the agency is the client and when privilege is necessary to obtain legal advice.

LEGAL EXEMPTIONS

DELIBERATIVE PROCESS PRIVILEGE

- The method through which an agency creates policies, opinions, rules and regulations.
- To qualify for this exemption, the record must be both pre-decisional and deliberative. Pre-decisional documents are those "generated before the adoption of an agency policy. A document is deliberative if it is a part of the agency give-and-take—process—by which the decision itself is made.

LEGAL EXEMPTIONS

Third-Party Communications & The Deliberative Process

- The deliberative process does not generally apply to communications that include third-parties. D.C. Code 2-534(a)(4) applies only to inter/intra agency documents.
- Communications that include third-parties may only be withheld under the deliberative process privilege, under the **consultant corollary**: if the third party has no independent interest (their interest is aligned with the government).

LEGAL EXEMPTIONS

Third-Party Communications & The Deliberative Process

- “In the ‘typical’ case in which a court applies the consultant corollary, ‘the consultant does not represent an interest of its own, or the interest of any other client, when it advises the agency that hires it.’ ‘[The consultant's] only obligations are to truth and its sense of what good judgment calls for, and in those respects the consultant functions just as an employee would be expected to do.’” *McKinley v. Bd. of Governors of the Fed. Reserve Sys.*, 647 F.3d 331, 336 (2011).

LEGAL EXEMPTIONS

Glomar Responses

- Acknowledging the existence of records would itself divulge protected information.
 - Agency can “neither confirm nor deny the existence of responsive records” (NCND response to FOIA).
- Search may not be required if all potential responsive records are entirely protected.
 - *Elec. Priv. Info. Ctr. v. NSA*, 678 F. 3d 926, 933 (D.C. Cir. 2012)
 - *Moore v. Nat'l DNA Index Sys.*, 662 F. Supp. 2d 136, 139 (D.D.C. 2009)
- Use caution - requests can also include responsive non-exempt records.



PRODUCING THE RECORDS

- A FOIA response does not have to provide **ANSWERS** to requestor's questions disguised as a FOIA request in response to an individual's request for information. The agency's obligation in meeting a FOIA request is to provide access to its records. *Dugan v. DOJ*, 82 F. Supp. 3d 485 (2015).

PRODUCING THE RECORDS

Do I have to create records?

FOIA does not require an agency to CREATE documents or opinions in response to an individual's request for information or to obtain records from another agency. *Dugan v. DOJ*, 82 F. Supp. 3d 485, 2015.

RECORD REDACTION

How to Perform Reasonable Redaction of Records

PRODUCING THE RECORDS: REASONABLE REDACTION

- A record may only be withheld in its entirety if the agency determines that the record cannot be reasonably redacted.
- A document may contain parts that are protected by a privilege, and parts that are not protected – the existence of the privileged parts cannot be used to justify withholding the non-privileged portions if reasonable redaction is possible.

PRODUCING
THE
RECORDS:
REASONABLE
REDACTIONS

D.C. Code 2-534(b) states:

(b) Any reasonably segregable portion of a public record shall be provided to any person requesting the record after deletion of those portions which may be withheld from disclosure pursuant to subsection (a) of this section.

In each case, the justification for the deletion shall be explained fully in writing, and the extent of the deletion shall be indicated on the portion of the record which is made available or published, unless including that indication would harm an interest protected by the exemption in subsection (a) of this section under which the deletion is made.

If technically feasible, the extent of the deletion and the specific exemptions shall be indicated at the place in the record where the deletion was made.

Questions to Ask When Redacting

1. Am I withholding an entire record?

2. Are parts of the record not privileged?

3. If I remove the privileged portions, is the document still legible

Answers
to
Questions
(Q1)

REASONABLE REDACTION

QUESTION 1: Am I withholding an entire record?

Did the search find responsive records?

If the search yields nothing, then you are NOT withholding a record.

Is the requester receiving everything found?

If the requester got everything found, you are not withholding An entire record.

Answers to Questions (Q2)

REASONABLE REDACTION

QUESTION 2: Are parts of the record NOT privileged?

So your agency is withholding an entire record. What is the basis for withholding it?

If you were to pick any random part of the record, would that basis be applicable?

If yes, it is proper to withhold in its entirety.

If no, you should be redacting and producing the record.

Is the reason personal privacy? Does the ENTIRE record raise privacy concerns (e.g. a tax return) or only parts (e.g. a work email that has a post-script about a medical procedure)?

Redacting personally identifying information may preserve privacy and permit you to release a redacted record.

Answers to Questions (Q2)

REASONABLE REDACTION: QUESTION 2:

Are parts of the record NOT privileged?

Are you withholding due to attorney-client privilege?

Is all of the document embraced by that privilege?

Was part of the communication shared with a third-party?

Is the reason deliberative process? Does the ENTIRE record raise privacy concerns (e.g. a tax return) or only parts (e.g. a work email that has a post-script about a medical procedure)?

Is the entire document part of the deliberation or are parts of it definitive statements of already established policy?

Does the document contain purely factual information – e.g. charts and graphs? Was the record is shared with a third party?

Answers
to
Questions
(Q2)

REASONABLE REDACTION

QUESTION 2: Are parts of the record NOT privileged?

Are you withholding due to a commercial interest?

Would the release of the entire document cause harm?

Or would only the release of dollar amounts cause harm?

REASONABLE REDACTION

QUESTION 3:

If I remove the privileged portions, is the document still legible?

"non-exempt portions of a document must be disclosed unless they are inextricably intertwined with exempt portions." *Mead Data Cent., Inc. v. United States Dep't of the Air Force*, 566 F.2d 242, 260 (D.C. Cir. 1977).

<https://www.justice.gov/oip/blog/foia-update-oip-guidance-reasonable-segregation-obligation>

If you redacted all exempt portions, would you be looking at a wall of black ink? If so, then you don't have to engage in redaction.

Are there paragraphs or pages that would not be exempt? If so, then you redact and release.

“Scoping”

- **Once I have identified a responsive record, can I redact information within the record that is non-responsive? (A practice known as “scoping”)**
- Once the government concludes that a particular record is responsive to a disclosure request, **the sole basis** on which it may withhold particular information within that record is if the information falls within one of FOIA’s statutory exemptions. *American Immigration Lawyers Ass’n v. Executive Office for Immigration Review*, 830 F.3d 667 (D.C. Cir. 2016).
- **What does this mean?** It means that discrete information within a responsive record cannot be redacted on the basis of non-responsiveness. It can be redacted only if a statutory exemption applies.



DECISION LETTERS

Effectively managing the FOIA process

DECISION LETTERS

WHAT IS REQUIRED IN AN AGENCY DECISION LETTER?

The agency decision letter should contain the following information:

1. Whether the record was released in full, partially released (redacted), or withheld in full;
2. The name and contact information of the person that made the decision concerning the release of records;
3. A reference to the D.C. Code provision that is the basis of the decision; and
4. A statement advising the requester of appeal rights.

DECISION LETTERS

Do Not Do: Decision Letters

- Do not use the language “if construed as a denial” when you are very clearly denying the request.
 - It is confusing; make sure your boilerplate is accurate!
- Do not withhold multiple records using multiple exemptions, with a single omnibus sentence.
 - i.e. “Agency is withholding all responsive records pursuant to Exemptions 1, 2 and 3.”
 - The DCMR requires that you identify which exemptions apply to which records. 1 DCMR § 407.2(b).

DECISION LETTERS

Do Not Do: Decision Letters

- Do not assert an exemption when you have not conducted a search.
 - Changing arguments on appeal makes the process look bad.
- Do not ignore a request for months and rely on FOIA appeals brought based on constructive denial to notify you that you are late.
 - When the response deadline comes up, you should be issuing a letter even if the search is not yet complete. 1 DCMR 405.5
- Do not wait to identify an overly broad request.
 - If the request is overly vague then you need to request additional information before you begin your search. *See* 1 DCMR § 402.5

QUESTIONS & ANSWERS

EFFECTIVELY
MANAGING THE FOIA
PROCESS



CONTACT
INFORMATION

Office of Open Government

- **Niquelle M. Allen**, Director,
niquelle.Allen@dc.gov, (202) 481-3406
- **Johnnie I. Barton**, Chief
Counsel,
johnnie.barton2@dc.gov, (202) 741-5373
- **Sheree DeBerry**, Attorney
Advisor,
sheree.deberry1@dc.gov, (202) 579-1043