

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

REMAPPING DEBATE,

Petitioner,

*-against-*

NEW YORK CITY POLICE DEPARTMENT,

Respondent.

Index No. **13-100638**

**AFFIRMATION OF  
ANDREW G. CELLI, JR.**

ANDREW G. CELLI, JR., an attorney duly admitted to practice before the Courts of the State of New York, affirms the following to be true under penalty of perjury:

1. I am a Partner of the firm of Emery Celli Brinckerhoff & Abady LLP (“ECBA”), attorneys for Petitioner Remapping Debate in this action. I respectfully submit this affirmation in support of Petitioner’s Verified Petition.

2. Attached as Exhibit A is a true and complete copy of Petitioner’s letter to the New York City Police Department (“NYPD”) FOIL Unit requesting records regarding parade permit applications (“Parade Permit FOIL Request”), dated May 24, 2012.

3. Attached as Exhibit B is a true and complete copy of Records Access Officer Richard Mantellino’s letter to Petitioner acknowledging the Parade Permit FOIL Request, dated June 5, 2012.

4. Attached as Exhibit C is a true and complete copy of Records Access Officer Richard Mantellino’s letter to Petitioner stating that Petitioner would receive a response to the Parade Permit FOIL Request by September 6, 2012, dated July 3, 2012.

5. Attached as Exhibit D is a true and complete copy of Records Access Officer Richard Mantellino's letter to Petitioner estimating that the Parade Permit FOIL Request would be completed by October 9, 2012, dated September 6, 2012.

6. Attached as Exhibit E is a true and complete copy of Petitioner's letter to Records Access Appeals Officer Jonathan David appealing the FOIL Unit's failure to process the Parade Permit FOIL Request, dated September 19, 2012.

7. Attached as Exhibit F is a true and complete copy of Records Access Appeals Officer Jonathan David's letter to Petitioner denying Petitioner's appeal, dated March 8, 2013.

8. Attached as Exhibit G is a true and complete copy of Petitioner's letter to the NYPD FOIL Unit requesting records regarding sound-device permits ("Sound-Device FOIL Request"), dated May 25, 2012.

9. Attached as Exhibit H is a true and complete copy of Records Access Officer Richard Mantellino's letter to Petitioner acknowledging the Sound-Device FOIL Request, dated June 5, 2012.

10. Attached as Exhibit I is a true and complete copy of Petitioner's letter to Records Access Officer Richard Mantellino following up on the Sound-Device FOIL Request, dated July 10, 2012.

11. Attached as Exhibit J is a true and complete copy of Records Access Officer Richard Mantellino letter to Petitioner estimating that the Sound-Device FOIL Request would be processed by September 5, 2012, dated July 3, 2012.

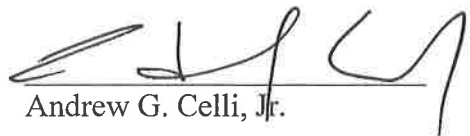
12. Attached as Exhibit K is a true and complete copy of Records Access Officer Richard Mantellino's letter to Petitioner estimating that the Sound-Device FOIL Request would be processed by October 5, 2012, dated September 5, 2012.

13. Attached as Exhibit L is a true and complete copy of Petitioner's letter to Records Access Appeals Officer Jonathan David appealing the FOIL Unit's failure to process the Sound-Device FOIL Request, dated September 20, 2012.

14. Attached as Exhibit M is a true and complete copy of Records Access Officer Richard Mantellino's letter to Petitioner estimating that the Sound-Device FOIL Request would be processed by November 8, 2012, dated October 5, 2012.

15. Attached as Exhibit N is a true and complete copy of Records Access Appeals Officer Jonathan David's letter to Petitioner denying Petitioner's appeal, dated January 4, 2013.

Dated: April 23, 2013  
New York, New York

  
Andrew G. Celli, Jr.

## Exhibit A

# REMAPPING DEBATE

Asking "Why" and "Why Not"

May 24, 2012

## VIA FEDERAL EXPRESS

Records Access Officer  
NYC Police Department  
F.O.I.L. Unit – Legal Bureau  
One Police Plaza, Room 110-C  
New York, New York 10038

Re: Request for records pursuant to Freedom of Information Law

Dear Records Access Officer:

These are requests for records, as that term is defined by Public Officers Law § 86(4), pursuant to Public Officers Law § 89(3)(a). I make this request on behalf of my not-for-profit public policy news publication, Remapping Debate, for which I work.

When used herein, the term "concerning" means relating to, referring to, describing, evidencing, or constituting. When you have the ability to retrieve or extract a record or data maintained in a computer storage system with reasonable effort, we are asking you to do so in conformance with the requirements of Public Officers Law § 89(3).

Each and all of the requests that follow concern only those applications for parade permits where the proposed parade route was wholly or partially in Manhattan.

Request No. 1. All records, whenever or by whom created, constituting or evidencing parade permit applications, whether made by current form PD637-041, a predecessor form, or by other means, where the application was submitted in any of the following periods:

- (a) July 1, 1967 through and including June 30, 1969;
- (b) July 1, 1991 through and including June 30, 1992;
- (c) July 1, 2004 through and including June 30, 2005; and
- (d) July 1, 2011 through and including today.

Request No. 2. All records, whenever or by whom created, and whether or not a copy of a document or other communication was sent or conveyed to an applicant, concerning the parade permits applications sought by Request No. 1 (other than the permits themselves), including but not limited to:

- (a) records evidencing the approval or denial of, or failure to act on, an application;
- (b) records concerning the reasons for the approval or denial of, or failure to act on, an application;
- (c) records making inquiry about or providing directions regarding an application; and
- (d) records describing the application or applicant.

Request No. 3. All records, whenever or by whom created, containing instructions to staff for handling parade permit applications, where such instructions were applicable in any portion of the time periods set forth in Request No. 1. The term "handling parade permit applications" is intended to include, but is not limited to the processing treatment, and determination of applications, including instructions on what considerations, if any, were mandatory or permissive, and what considerations, if any, were prohibited.

We are prepared to pay the fees associated with your providing us with copies of the records (and, as applicable, with data-related costs as permitted pursuant to Public Officers Law §§ 87(1)(b)(iii); 87(1)(c); and 89(3(a)).

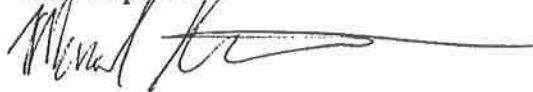
Please advise us promptly whether there are any records requested that you are not prepared to produce pursuant to Public Officers Law § 87(2) or otherwise.

For records that you do not claim are exempt from disclosure, please advise when you will be producing them. If the time frame for producing the records encompassed by each request varies, please advise us of that as well.

Thank you.

Very truly yours,

Mike Alberti  
Staff Reporter



## Exhibit B



POLICE DEPARTMENT  
LEGAL BUREAU

F.O.I.L. Unit, Room 110C  
One Police Plaza  
New York, NY 10038

6/5/2012

Remapping Debate  
Mike Alberti  
54 West 21 Street ste 707  
New York NY 10010

Foil Req # 2012-PL-3199

Your File #

Dear Sir or Madam:

This is in response to your letter dated 5/24/2012 which was received by this office on 5/30/2012 in which you requested access to certain records under the Freedom of Information Law, N.Y. Public Officers Law (POL) §§ 84 et seq. (FOIL).

Before a determination can be rendered, further review is necessary to assess the potential applicability of exemptions set forth in FOIL, and whether the records can be located. I estimate that this review will be completed, and a determination issued, within twenty business days of the date of this letter.

This is not a denial of the records you requested. Should your request be denied in whole or in part, you will then be advised in writing of the reason for any denial, and of the name and address of the Records Access Appeals Officer.

Sincerely,

Richard Mantellino  
Lieutenant  
Records Access Officer



## Exhibit C



**POLICE DEPARTMENT  
LEGAL BUREAU**

F.O.I.L. Unit, Room 110C  
One Police Plaza  
New York, NY 10038

Remapping Debate  
Mike Alberti  
54 West 21 Street ste 707  
New York NY 10010

7/3/2012

Foil Req # 2012-PL-3199  
Your File #

Dear Sir or Madam:

This letter is in response to your letter dated 5/24/2012, which was acknowledged on 6/5/2012.

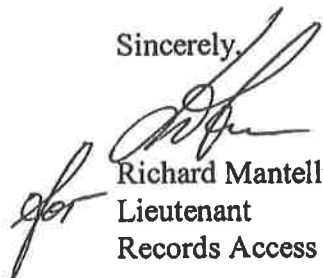
Please be advised that this office requires additional time to determine your request. This office receives a very large number of FOIL requests. We make every effort to process FOIL requests as expeditiously as possible, in the order in which they are received.

Your request has been assigned to Police Officer Rivera of this office, and it is estimated that processing of your request will be completed by 9/6/2012. The estimated time required to determine your request is based on the following factor(s):

- Records are located in several locations and are difficult to search or locate.
- Records are archived and are difficult to locate and retrieve.
- Numerous records must be reviewed in order to determine whether disclosure is required.
- Record(s) have not yet been received from other NYPD unit(s).
- Request is extremely voluminous and/or complex.
- Other:

This is not a denial of the records you requested. Should your request be denied in whole or in part, you will then be advised in writing of the reason for any denial, and of the name and address of the Records Access Appeals Officer.

Sincerely,



Richard Mantellino  
Lieutenant  
Records Access Officer

## Exhibit D



**POLICE DEPARTMENT  
LEGAL BUREAU**

F.O.I.L. Unit, Room 110C  
One Police Plaza  
New York, NY 10038

Remapping Debate  
Mike Alberti  
54 West 21 Street ste 707  
New York NY 10010

9/6/2012

Foil Req # 2012-PL-3199  
Your File #

Dear Sir or Madam:

This letter is in further response to your letter dated 5/24/2012, which was acknowledged on 6/5/2012.

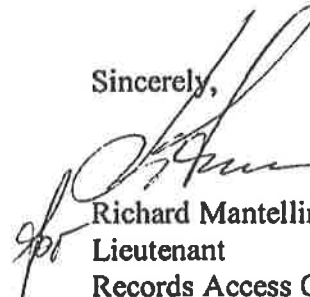
Please be advised that this office requires additional time to determine your request. This office receives a very large number of FOIL requests. We make every effort to process FOIL requests as expeditiously as possible, in the order in which they are received.

Your request has been assigned to Police Officer Rivera of this office, and it is estimated that processing of your request will be completed by 10/9/2012. The estimated time required to determine your request is based on the following factor(s):

- Records are located in several locations are difficult to search or locate.
- Records are archived and are difficult to locate and retrieve.
- Numerous records must be reviewed in order to determine whether disclosure is required.
- Record(s) have not yet been received from other NYPD unit(s).
- Request is extremely voluminous and/or complex.
- Other:

This is not a denial of the records you requested. Should your request be denied in whole or in part, you will then be advised in writing of the reason for any denial, and of the name and address of the Records Access Appeals Officer.

Sincerely,



Richard Mantellino  
Lieutenant  
Records Access Officer

## Exhibit E

# REMAPPING DEBATE

Asking "Why" and "Why Not"

September 19, 2012

VIA FEDERAL EXPRESS

Mr. Jonathan David  
Records Access Appeals Officer  
New York City Police Department  
One Police Plaza  
New York, New York 10038

Re: FOIL Request 2012-PL-3199

Dear Mr. David:

This letter constitutes an appeal from the Department's denial of our rights under the Freedom of Information Law in connection with the above-referenced requests. A copy of the initial requests, made May 24th is enclosed herewith, as is the Department's June 5th letter, which estimated completion of review within 20 business days (July 3rd).

No determination was rendered, and I spoke shortly thereafter with Police Officer Rivera, who had been assigned to the requests. P.O. Rivera said that documents should be ready by early September. No records have been forthcoming.

Instead, we received a letter from the Department, dated September 6th, which purports *not* to be a denial of the requests. That letter is enclosed.

But that letter does not even state that the Department has made a determination to grant the requests in whole or in part, and fails to set forth a reason for the failure to produce that is compatible with the commands of the statute: the requests, after all, were not made to the Police Department's Freedom of Information Unit (thereby somehow justifying the vague "we haven't gotten it from another unit" response); rather, the requests were made of the Department itself, which has the responsibility to explain with specificity why those having custody of the records have not produced them. *Cf.* Public Officers Law §§ 89(3)(a); 84. The statement that Police Officer Rivera has been assigned to the request likewise moves nothing along: he has been the assigned officer all along.

Accordingly, we appeal the constructive denial of our requests pursuant to Public Officers Law §89(4)(a).

Very truly yours,



Mike Alberti  
Chief Correspondent

## Exhibit F



**POLICE DEPARTMENT**  
**Office of Deputy Commissioner,**  
**Legal Matters**  
**One Police Plaza, Room 1406A**  
**New York, New York 10038**

March 8, 2013

Mike Alberti  
Chief Correspondent  
Remapping Debate  
54 West 21<sup>st</sup> Street, Suite 707  
New York, New York 10010

**RE: FREEDOM OF INFORMATION LAW**  
**REQUEST: LBF # 12PL103199**

Dear Mr. Alberti:

This is in response to your appeal letter, dated September 19, 2012, appealing the purported denial of your May 24, 2012 request for records from the New York City Police Department pursuant to the Freedom of Information Law ("FOIL").

Your appeal is premature inasmuch as your request was has not been denied. Rather, no determination has been made by the Records Access Officer (RAO). Inasmuch as your FOIL request was not denied, the appeal lacks the predicate denial of access and is, therefore, premature. The RAO sent you a letter, dated June 5, 2012, acknowledging receipt of your request, which was assigned file number 12PL103199, and advised you of an estimated date of determination. The RAO complied with the provisions of New York Public Officers Law Section 89(3)(a) in that he timely acknowledged receipt of your request, provided you with an approximate date when a determination would be made, and commenced a search for the records you requested. However, the length of time required to search for records responsive to your request has exceeded the initial time estimate due to the large volume of requests processed by the NYPD's FOIL Unit as well as the nature of your request.

This matter is remanded to the RAO for continued processing of your FOIL request.

Sincerely,

Jonathan David  
Records Access Appeals Officer

c: Committee on Open Government



## Exhibit G

# REMAPPING DEBATE

Asking "Why" and "Why Not"

May 25, 2012

## VIA FEDERAL EXPRESS

Records Access Officer  
NYC Police Department  
F.O.I.L. Unit – Legal Bureau  
One Police Plaza, Room 110-C  
New York, New York 10038

Re: Request for records pursuant to Freedom of Information Law

Dear Records Access Officer:

These are requests for records, as that term is defined by Public Officers Law § 86(4), pursuant to Public Officers Law § 89(3)(a). I make this request on behalf of my not-for-profit public policy news publication, Remapping Debate, for which I work.

When used herein, the term “concerning” means relating to, referring to, describing, evidencing, or constituting. When you have the ability to retrieve or extract a record or data maintained in a computer storage system with reasonable effort, we are asking you to do so in conformance with the requirements of Public Officers Law § 89(3).

Each and all of the requests that follow concern only those applications for sound device permits where the application was submitted to one or more precincts in Manhattan.

Request No. 1. All records, whenever or by whom created, constituting or evidencing sound device permit applications, whether made by current form PD656-041A, a predecessor form, or by other means, where the application was submitted in any of the following periods:

- (a) July 1, 1967 through and including June 30, 1969;
- (b) July 1, 1991 through and including June 30, 1992;
- (c) July 1, 2004 through and including June 30, 2005; and
- (d) July 1, 2011 through and including today.

Request No. 2. All records, whenever or by whom created, and whether or not a copy of a document or other communication was sent or conveyed to an applicant, concerning the sound device permit applications sought by Request No. 1 (other than the permit applications themselves), including but not limited to:

- (a) records evidencing the approval or denial of, or failure to act on, an application;
- (b) records concerning the reasons for the approval or denial of, or failure to act on, an application;
- (c) records making inquiry about or providing directions regarding an application; and
- (d) records describing the application or applicant.

Request No. 3. All records, whenever or by whom created, containing instructions to staff for handling sound device permit applications, where such instructions were applicable in any portion of the time periods set forth in Request No. 1. The term "handling sound device permit applications" is intended to include, but is not limited to the processing treatment, and determination of applications, including instructions on what considerations, if any, were mandatory or permissive, and what considerations, if any, were prohibited.

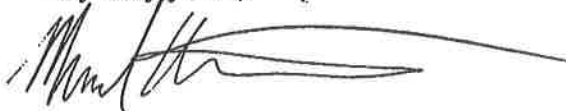
We are prepared to pay the fees associated with your providing us with copies of the records (and, as applicable, with data-related costs as permitted pursuant to Public Officers Law §§ 87(1)(b)(iii); 87(1)(c); and 89(3(a)).

Please advise us promptly whether there are any records requested that you are not prepared to produce pursuant to Public Officers Law § 87(2) or otherwise.

For records that you do not claim are exempt from disclosure, please advise when you will be producing them. If the time frame for producing the records encompassed by each request varies, please advise us of that as well.

Thank you.

Very truly yours,



Mike Alberti  
Staff Reporter

## Exhibit H



**POLICE DEPARTMENT  
LEGAL BUREAU**

F.O.I.L. Unit, Room 110C  
One Police Plaza  
New York, NY 10038

Remapping Debate  
Mike Alberti  
54 West 21 Street ste 707  
New York NY 10010

6/5/2012

Foil Req # 2012-PL-3161

Your File #

Dear Sir or Madam:

This is in response to your letter dated 5/25/2012 which was received by this office on 5/30/2012 in which you requested access to certain records under the Freedom of Information Law, N.Y. Public Officers Law (POL) §§ 84 et seq. (FOIL).

Before a determination can be rendered, further review is necessary to assess the potential applicability of exemptions set forth in FOIL, and whether the records can be located. I estimate that this review will be completed, and a determination issued, within twenty business days of the date of this letter.

This is not a denial of the records you requested. Should your request be denied in whole or in part, you will then be advised in writing of the reason for any denial, and of the name and address of the Records Access Appeals Officer.

Sincerely,

Richard Mantellino  
Lieutenant  
Records Access Officer

## Exhibit I

# REMAPPING DEBATE

Asking "Why" and "Why Not"

July 10, 2012

VIA FEDERAL EXPRESS

Lieutenant Richard Mantellino  
Records Access Officer  
NYC Police Department  
F.O.I.L. Unit — Legal Bureau  
One Police Plaza, Room 110-C  
New York, New York 10038

Re: Foil Request # 2012-PL-3161

Dear Lieutenant Mantellino:

I am writing in regard to a Freedom of Information Law request sent to your office on 5/25/2012, a copy of which is enclosed. In a letter dated 6/5/2012, a copy of which is enclosed, your office acknowledged the receipt of the aforementioned request, and indicated that you expected to complete a review and issue a determination on the request within twenty business days, or by 7/3/2012. I have not received any correspondence from your office since the 6/5/2012 letter. Please advise me on the status of my request at your earliest convenience.

Sincerely,



Mike Alberti

## Exhibit J





**POLICE DEPARTMENT  
LEGAL BUREAU**

F.O.I.L. Unit, Room 110C  
One Police Plaza  
New York, NY 10038

Remapping Debate  
Mike Alberti  
54 West 21 Street ste 707  
New York NY 10010

7/3/2012

Foil Req # 2012-PL-3161  
Your File #

Dear Sir or Madam:

This letter is in response to your letter dated 5/25/2012, which was acknowledged on 6/5/2012.

Please be advised that this office requires additional time to determine your request. This office receives a very large number of FOIL requests. We make every effort to process FOIL requests as expeditiously as possible, in the order in which they are received.

Your request has been assigned to Police Officer Rivera of this office, and it is estimated that processing of your request will be completed by 9/5/2012. The estimated time required to determine your request is based on the following factor(s):

- Records are located in several locations and are difficult to search or locate.
- Records are archived and are difficult to locate and retrieve.
- Numerous records must be reviewed in order to determine whether disclosure is required.
- Record(s) have not yet been received from other NYPD unit(s).
- Request is extremely voluminous and/or complex.
- Other:

This is not a denial of the records you requested. Should your request be denied in whole or in part, you will then be advised in writing of the reason for any denial, and of the name and address of the Records Access Appeals Officer.

Sincerely,

Richard Mantellino  
Lieutenant  
Records Access Officer

## Exhibit K



**POLICE DEPARTMENT  
LEGAL BUREAU**

F.O.I.L. Unit, Room 110C  
One Police Plaza  
New York, NY 10038

Remapping Debate  
Mike Alberti  
54 West 21 Street ste 707  
New York NY 10010

9/5/2012

Foil Req # 2012-PL-3161  
Your File #

Dear Sir or Madam:

This letter is in further response to your letter dated 5/25/2012, which was acknowledged on 6/5/2012.

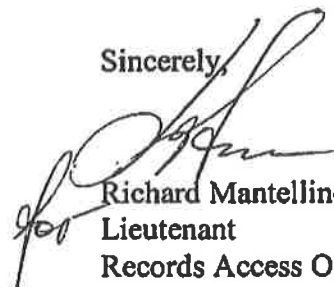
Please be advised that this office requires additional time to determine your request. This office receives a very large number of FOIL requests. We make every effort to process FOIL requests as expeditiously as possible, in the order in which they are received.

Your request has been assigned to Police Officer Rivera of this office, and it is estimated that processing of your request will be completed by 10/5/2012. The estimated time required to determine your request is based on the following factor(s):

- Records are located in several locations are difficult to search or locate.
- Records are archived and are difficult to locate and retrieve.
- Numerous records must be reviewed in order to determine whether disclosure is required.
- Record(s) have not yet been received from other NYPD unit(s).
- Request is extremely voluminous and/or complex.
- Other:

This is not a denial of the records you requested. Should your request be denied in whole or in part, you will then be advised in writing of the reason for any denial, and of the name and address of the Records Access Appeals Officer.

Sincerely,



Richard Mantellino  
Lieutenant  
Records Access Officer

## Exhibit L

# REMAPPING DEBATE

Asking "Why" and "Why Not"

September 20, 2012

VIA FEDERAL EXPRESS

Mr. Jonathan David  
Records Access Appeals Officer  
New York City Police Department  
One Police Plaza  
New York, New York 10038

Re: FOIL Request 2012-PL-3161

Dear Mr. David:

This letter constitutes an appeal from the Department's denial of our rights under the Freedom of Information Law in connection with the above-referenced requests. A copy of the initial requests, made on May 25th is enclosed herewith, as is the Department's June 5th letter, which estimated completion of review within 20 business days (July 3rd).

No determination was rendered. The Department sent a July 3rd letter (enclosed), by which it changed its estimate to September 5th. On September 5th, the Department sent another form letter that was identical to its predecessor except for tacking on a month (enclosed).

Both the Department's July 3rd letter and its September 5th letter purported *not* to be denials of the request.

Neither letter states even that the Department has made a determination to grant the requests in whole or in part; both fail to set forth a reason for the failure to produce that is compatible with the commands of the statute: the requests, after all, were not made to the Police Department's Freedom of Information Unit (thereby somehow justifying the vague "we haven't gotten it from another unit" response); rather, the requests were made of the Department itself, which has the responsibility to explain with specificity why those having custody of the records have not produced them. *Cf.* Public Officers Law §§ 89(3)(a); 84.

Accordingly, we appeal the constructive denial of our requests pursuant to Public Officers Law §89(4)(a).

Very truly yours,

  
Mike Alberti  
Chief Correspondent

## Exhibit M



**POLICE DEPARTMENT  
LEGAL BUREAU**

F.O.I.L. Unit, Room 110C  
One Police Plaza  
New York, NY 10038

Remapping Debate  
Mike Alberti  
54 West 21 Street ste 707  
New York NY 10010

10/5/2012

Foil Req # 2012-PL-3161  
Your File #

Dear Sir or Madam:

This letter is in further response to your letter dated 5/25/2012, which was acknowledged on 6/5/2012.

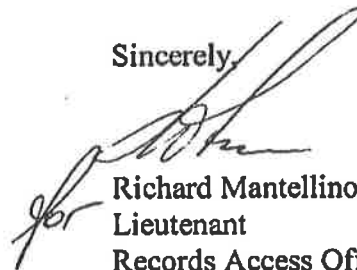
Please be advised that this office requires additional time to determine your request. This office receives a very large number of FOIL requests. We make every effort to process FOIL requests as expeditiously as possible, in the order in which they are received.

Your request has been assigned to Police Officer Rivera of this office, and it is estimated that processing of your request will be completed by 11/8/2012. The estimated time required to determine your request is based on the following factor(s):

- Records are located in several locations are difficult to search or locate.
- Records are archived and are difficult to locate and retrieve.
- Numerous records must be reviewed in order to determine whether disclosure is required.
- Record(s) have not yet been received from other NYPD unit(s).
- Request is extremely voluminous and/or complex.
- Other:

This is not a denial of the records you requested. Should your request be denied in whole or in part, you will then be advised in writing of the reason for any denial, and of the name and address of the Records Access Appeals Officer.

Sincerely,



Richard Mantellino  
Lieutenant  
Records Access Officer

## Exhibit N





POLICE DEPARTMENT  
Office of Deputy Commissioner,  
Legal Matters  
One Police Plaza, Room 1406A  
New York, New York 10038

January 4, 2013

Mike Alberti  
Chief Correspondent  
Remapping Debate  
54 West 21<sup>st</sup> Street, Suite 707  
New York, New York 10010

RE: FREEDOM OF INFORMATION LAW  
REQUEST: LBF #12PL103161

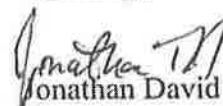
Dear Mr. Alberti:

This is in response to your appeal letter, dated September 20, 2012, appealing the purported denial of your May 25, 2012 request for records from the New York City Police Department pursuant to the Freedom of Information Law ("FOIL").

Your appeal is premature inasmuch as your request was has not been denied. Rather, no determination has been made by the Records Access Officer (RAO). Inasmuch as your FOIL request was not denied, the appeal lacks the predicate denial of access and is, therefore, premature. The RAO sent you a letter, dated June 5, 2012, acknowledging receipt of your request, which was assigned file number 12PL103161, and advised you of an *estimated date of determination*. The RAO complied with the provisions of New York Public Officers Law Section 89(3)(a) in that he timely acknowledged receipt of your request, provided you with an approximate date when a determination would be made, and commenced a search for the records you requested. However, the length of time required to search for records responsive to your request has exceeded the initial time estimate due to the large volume of requests processed by the NYPD's FOIL Unit as well as the nature of your request.

This matter is remanded to the RAO for continued processing of your FOIL request.

Sincerely,

  
Jonathan David

Records Access Appeals Officer

c: Committee on Open Government