

Foreseeable Harm Standard

**U.S. Associate Attorney General
Vanita Gupta**

Decertify FOIA.gov

FOIAonline Records

**Chief FOIA Officers Council
November 3, 2022**

PUBLIC COMMENT November 4, 2022

by Robert Hammond
foiacompliance@gmail.com
[@foiacompliance](https://twitter.com/foiacompliance) (Twitter)

**Copy to:
Attorney General Merrick Garland
United States Associate Attorney General Vanita Gupta**



PREFACE

This supplements my public comments:

- Foreseeable Harm Standard. DOJ Office of Information Policy (DOJ OIP) Misinformation + Navy Misconduct and Idiocy
- Sued into Oblivion. Foreseeable Harm Standard
- Preserve FOIAonline Records + Decertify FOIA.gov + Audit NARA + Post FOIA Logs

<https://www.documentcloud.org/app?q=%2Buser%3Arobert-hammond-106693%20>

This provides as attachments:

- A. Hammond oral comments to the November 3, 2022 Chief FOIA Officers Meeting – foreseeable harm, misconduct, FOIAonline records, etc.
- B. Hammond prepared All Panelists chat comments.
- C. Hammond pre-meeting email November 2, 2022 10:28:23 AM advising Ms. Gupta, Ms. Semo, and others that the April 21, 2022 meeting transcripts and meeting minutes are inaccurate and must be redone.
- D. Hammond pre-meeting email of October 31, 2022 11:35 AM addressing topics to consider and the requirement to consult with members of the public.
- E. Hammond Sample Public Comments to Open FOIA Meetings. <https://www.documentcloud.org/app?q=%2Buser%3Arobert-hammond-106693%20>

TRUTH, transparency, and accountability matter!

ATTACHMENT A

Hammond oral comments to the November 3, 2022

Chief FOIA Officers Meeting – foreseeable harm,
misconduct, FOIAonline records, etc.

This is Bob Hammond. Thank you. Great stuff. Can you hear me? I will keep calling back after my three minutes are up.

My first topic is the foreseeable harm standard – see my two public comment briefings which I sent to Attorney General Merrick Garland.

The FOIA statute, DOJ policy, and case law require defendants to clearly articulate what that harm is for any withholding or redaction, and it cannot be speculative.

This is extremely important because DOJ OIP's website states DOJ will not defend cases where no foreseeable harm is articulated, and Attorney General Merrick Garland reiterated this.

My ongoing case Hammond v. DOD 16-421-CV in the District Court of Columbia is a perfect example.

DOJ United States Associate Attorney General Vanita Gupta must review this. DOJ must recuse from future litigation filings but not mediation.

DOD combined eight disparate 2014 FOIA requests in one appellate denial where DOD did not articulate any basis for withholding records to six of the eight requests, let alone any foreseeable harm. Then, DOD withheld under Exemption 5 deliberative process antecedent records of Walter Reed National Military Medical Center's FY 2013 annual FOIA report submission and raw data to Navy BUMED without articulating any foreseeable harm, nor could they. That is BUMED spelled BUMED.

Then, during litigation, DOD through DOJ added B6 (privacy) in withholding a 17-page Walter Reed FY 2013 FOIA log. After withdrawing withholding in entirety under B5, DOD through DOJ released a 16-page log which the FOIA Officer admits to altering during litigation that does not comport with the 17-page log cited in the Vaughn Index. That is VAUGHN.

In addition to B6, which DOD through DOJ falsely states only pertains to persons seeking their own medical records, the materially altered log contains redactions under B4, B5, and B7 never cited in any Vaughn index or defended in litigation, let alone not having articulated any foreseeable harm.

Apart from no foreseeable harm, DOJ can no longer participate in misconduct that includes admitted alteration of records during litigation, admitted destruction of records after being advised multiple times to preserve them for judicial review, admitted and known materially false FOIA Officer declarations, statements that DOD's Agency Counsel provided records in an email to my former counsel, when the exhibit of that email documents that is false. And DOD through DOJ continued to submit the same FOIA Officer declarations and false statements as to Agency Counsel's email multiple times despite knowing them to be false.

DOJ cannot continue to defend and must recuse.

-- Three minutes. ---

Then, Department of Navy BUMED initially lied in stating that Walter Reed had not submitted any FY 2013 FOIA reports or raw to data, which BUMED walked back outside of litigation in response to a NARA Unauthorized Disposition Inquiry, where DOD states BUMED received Walter Reed's FY 2013 report submission subject to my April 1, 2014 FOIA request but did not retain it.

I believe most FOIA professionals just want to do a good job without interference from management or agency lawyers.

I do not believe that BUMED's FOIA officer, Dela Garcia, is responsible for the apparent false official statement that BUMED did not receive Walter Reed's FY 2013 FOIA report submission, nor for DOD's claim to NARA that BUMED destroyed the records. I believe those records still exist and that Della did not destroy them.

You may not know that lawyers defending their clients are exempt from false official statement statutes – they are allowed to lie. But that is not the case for a FOIA Officer who gets hung out to dry in provably/proven materially false sworn declarations that may have been drafted or edited by others. I am not a lawyer, but attorney protections may not pertain to subordination of know materially false declarations, entering altered records into evidence, and materially false statements where the attorney is the subject of the statement (e.g., Agency Counsel's false email claim).

DOJ cannot continue to defend and must recuse.

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My second topic is Disestablishment of FOIAonline, preservation of records, and agency replacement plans. See my public comment, "Preserve FOIAonline Records + Decertify FOIA.gov"

It addresses:

- Preserve FOIAonline Unique Case Processing Records
- De-certify FOIA.gov Application and its Data
- Audit NARA FOIA Processing and Reporting
- Post FOIA Contemporaneous Processing Logs

The FOIA Advisory recommended this twice. It has been approved twice. Yet OGIS and DOJ continue to misrepresent that and have not take any action to implement it.

There have not been any public discussions of FOIAonline going away and particularly preservation of the more than 200 data elements in FOIAonline that comprise unique FOIA case processing records not duplicated elsewhere.

In utter folly NARA does not know what a federal record is that is subject to FOIA and claims they do not have to preserve or produce FOIAonline records.

From NARA's own website, a Federal record is defined in 44 U.S.C. 3301 as including "all books, [records] papers, maps, photographs, machine readable materials, or other documentary materials, regardless of physical form or characteristics, **made or received by an agency** of the United States Government ...

And if you read further on NARA's website, they refer to 36 USC ... which is NARA's own CFR.

ATTACHMENT B

Hammond prepared All Panelists chat comments.

| All Panelist Comments November 3, 2022 Chief FOIA Officers Council Meeting | # |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
| Questions to be read aloud but not during public oral comments. | 1. |
| OGIS/DOJ OIP. Why is the YouTube chat turned off depriving the Council of input from the public in apparent violation of law? | 2. |
| I would like a show of hands from panelists. Should YouTube chat be turned on for these meetings? | 3. |
| DOJ OIP. FOIA.gov data is massively false. What are you doing about it? Will you place a disclaimer on FOIA.gov regarding inaccurate data? | 4. |
| Will DOJ require agencies to certify that their data is true, accurate and complete to the best of their knowledge or in the alternative that they know it is not accurate.? If not, why not. | 5. |
| DOJ OIP and OGIS. What audits will you conduct to ascertain the accuracy of quarterly and annual FOIA raw data and reports and what sample size? | 6. |
| DOJ OIP and OGIS. Will you require agencies to amend past errant FOIA reports and post both copies? | 7. |
| FOIA AC. FOIAonline data are unique case processing records not duplicated elsewhere. See definition of a record 44 U.S.C. 3301 “made or received by an agency.” What are you doing to preserve records? | 8. |
| FOIA AC. Will you commit to meetings of the full Committee to receive input from the public in lieu of Co-chairs doing this on their own, which violates the FOIA. | 9. |
| “the Council shall consult on a regular basis with members of the public” | 10. |
| OGIS. In violation of law OGIS is not conducting any mediation and deferring requests to the Agency FOIA Public Liaison. | 11. |
| OGIS what is the FY 2023 dollar amount needed to fully execute your dual compliance and mediation missions? | 12. |
| DOJ OIP. What is the FY 2023 dollar amount needed to fully execute your compliance oversight and other FOIA missions? | 13. |
| OGIS. In violation of law Ombuds reports cite number of times OGIS and FPL ADR was sought rather than engaged in ADR. Will you correct this. Will you report # times OGIS or Agency refused mediation? | 14. |

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| OGIS. How many formal mediations if any did you conduct in FY 2022? 2021? Post answer in meeting minutes. | 15. |
| OGIS. The transcript to the April 21, 2022 meeting is materially inaccurate. Will you post a dated amended copy along side the original | 16. |
| OGIS. The meeting minutes to the April 21, 2022 meeting are materially inaccurate, omitting the entire content of public oral comments. Will you amend the meeting minutes and post both copies? | 17. |
| Vanita Gupta. Will DOJ recuse from Hammond v. DOD, 16-421-CV in the District Court of Colombia due to no articulated foreseeable harm and agency misconduct? | 18. |

ATTACHMENT C

Hammond pre-meeting email November 2, 2022
10:28:23 AM advising Ms. Gupta, Ms. Semo, and
others that the April 21, 2022 meeting transcripts
and meeting minutes are inaccurate and
must be redone.

From: foiacompliance@gmail.com
To: alina.semo@nara.gov; bobak.Talebian@usdoj.gov; kirsten.mitchell@nara.gov; "FOIA Advisory Committee"; debra.wall@nara.gov; Vanita.Gupta19@usdoj.gov; bobak.Talebian@usdoj.gov; "OGIS"
Cc: "FOIA Advisory Committee"; sheela.portonovo@nara.gov; teresa.brady@nara.gov; CHRISTA.Lemelin@nara.gov; daniel.levenson@nara.gov; kimberly.reed@nara.gov; carrie.mcquire@nara.gov; dwaine.bacon@nara.gov; jessica.hartman@nara.gov; jay.trainer@nara.gov; "Kirsten Mitchell"; "Martha Murphy"; REDACTED
Subject: Post V2. RE: Public Comment to 2022- 2024 FOIA Advisory Committee & Chief FOIA Officers Council. Sued into Oblivion. Foreseeable Harm Standard
Wednesday, November 2, 2022 10:28:23 AM
Date: [Transcript_National Archives Aoeil 21, 2022 Cief FOIA Officers Meeting edited v2.docx](#)
Attachments: [Sued into Oblivion. Foreseeable Harm Standard v2.pdf](#)

Ms. Gupta, Ms. Wall, Ms. Semo. Mr. Talebian, et. al.

Please post revised presentation "Sued into Oblivion. Foreseeable Harm Standard v2." I found additional transcription errors to my oral public comments.

To assist you in revising your official transcript, I am attaching track changes to my oral comments. This document is not for posting. I suggest that someone match the video to the transcript and correct other errors. You must post a revised transcript and label it as such.

You must also revise your meeting minutes to reflect the content of oral comments and to identify written comments; else your minutes do not meet the requirements of the FOIA statute:

“(E) Detailed minutes of each meeting of the Council shall be kept and shall contain a record of the persons present, a complete and accurate description of matters discussed and conclusions reached, and copies of all reports received, issued, or approved by the Council.’

Please post revised meeting minutes and label them as such and include the date of the revision.

With my deep respect,

Robert Hammond

From: foiacompliance@gmail.com <foiacompliance@gmail.com>

Sent: Tuesday, November 1, 2022 10:30 PM

To: alina.semo@nara.gov; bobak.Talebian@usdoj.gov; kirsten.mitchell@nara.gov; 'FOIA Advisory

Committee' <foia-advisory-committee@nara.gov>; debra.wall@nara.gov;
Vanita.Gupta19@usdoj.gov; bobak.Talebian@usdoj.gov; 'OGIS' <OGIS@nara.gov>
Cc: 'FOIA Advisory Committee' <foia-advisory-committee@nara.gov>; sheela.portonovo@nara.gov;
teresa.brady@nara.gov; CHRISTA.Lemelin@nara.gov; daniel.levenson@nara.gov;
kimberly.reed@nara.gov; carrie.mcguire@nara.gov; dwaine.bacon@nara.gov;
jessica.hartman@nara.gov; jay.trainer@nara.gov; 'Kirsten Mitchell' <kirsten.mitchell@nara.gov>;
'Martha Murphy' <martha.murphy@nara.gov>
Subject: Public Comment to 2022- 2024 FOIA Advisory Committee & Chief FOIA Officers Council.
Sued into Oblivion. Foreseeable Harm Standard

[Best viewed as HTML]

Ms. Semo, [Ms. Gupta](#), et. al.

Please pass to the full FOIA Advisory Committee and Chief FOIA Officers Council.

Please timely post the attached public comment to the FOIA Advisory Committee and Chief FOIA Officers Council websites, “Sued into Oblivion. Foreseeable Harm Standard.”

I am a private citizen Freedom of Information Act advocate, Naval Academy graduate/career veteran/DoD civilian (and now reluctant whistleblower when needed) who loves our country and believes that “An informed citizenry is at the heart of a dynamic democracy.” (Thomas Jefferson). Integrity and accountability matter.

I will work with anyone to improve FOIA. FOIA must work for agencies and requesters alike. I am placing documents into the public domain to compel needed change.

This supplements my public comment, Foreseeable Harm Standard. DOJ Office of Information Policy (DOJ OIP) Misinformation + Navy Misconduct and Idiocy

HOW AGENCIES MAY BE SUED INTO OBLIVION.

Any agency that merely states in a determination letter that the agency has considered the foreseeable harm standard rather than articulating that harm for each exemption will be deemed in litigation as having violated the FOIA and case law. You will lose.

Rather than merely stating that the agency has considered the foreseeable harm standard, the agency must **articulate** what that foreseeable harm is, and it cannot be speculative.

As Attorney General Merrick Garland says in his March 15, 2022 Memo:

“Information that might technically fall within an exemption should not be withheld from a FOIA requester unless the agency can **identify** a foreseeable harm or legal bar to disclosure. In case of doubt, openness should prevail.”

Attachments:

- A. Attorney General Memo of March 15, 2022, Subject: Freedom of Information Act Guidelines
- B. April 21, 2022 Chief FOIA Officers Meeting Official Transcript
- C. Hammond Posted Public Comments

With my deep respect,

Robert Hammond

Copy to:

Attorney General Merrick Garland

United States Associate Attorney General Vanita Gupta

ATTACHMENT D

Hammond pre-meeting email of October 31, 2022

11:35 AM addressing topics to consider and the requirement to consult with members of the public.

From: foiacompliance@gmail.com
To: dod.foia.pa@gmail.com; Vanita.Gupta19@usdoj.gov; bobak.Talebian@usdoj.gov; alina.semo@nara.gov; "FOIA Advisory Committee"; bobak.Talebian@usdoj.gov; debra.wall@nara.gov
Cc: alina.semo@nara.gov; martha.murphy@nara.gov; sheela.portonovo@nara.gov; carrie.mcquiere@nara.gov; kirsten.mitchell@nara.gov; dwaine.bacon@nara.gov; jessica.hartman@nara.gov; daniel.levenson@nara.gov; kimberlee.ried@nara.gov; teresa.brady@nara.gov; foiacompliance@gmail.com
Subject: 4 CFO Council meetings per year w. 15 min oral public comments + 3 Nov Chief FOIA Officers Council meeting
Date: Monday, October 31, 2022 11:35:37 AM
Attachments: [Mandatory Right to OGIS Dispute Resolution - OGIS Malfeasance 20220616.pdf](#)

[Best Viewed as HTML. See attached.]

Greetings Ms. Wall, Ms. Gupta, Chief FOIA Officers, FOIA Advisory Committee, FOIA professionals, media, interested parties.

The FOIA Statute mandates that:

5. **(B) In performing the duties described in subparagraph (A), the Council shall consult on a regular basis with members of the public who make requests under this section.**

(6)(A) The Council shall meet regularly and such meetings shall be open to the public unless the Council determines to close the meeting for reasons of national security or to discuss information exempt under subsection (b).

1. The Committee cannot meet its statutory mandates with one meeting per year in which the OGIS Director limits oral comments from members of the public to just three minutes per member of the public and then refuses to allow me to use the full fifteen minutes when there are no other members of the public waiting to speak. OGIS also attempts to filibuster the oral comments time, which must be only for **oral comments from members of the public**. This is a recent OGIS ploy developed to suppress oral comments unfavorable to OGIS. I suggest that the Committee members make your voices heard on this matter. In performing your compliance duties, you need to hear from members of the public; else the remedy may be increased Congressional oversight and audits.

2. Similarly, Ms. Semo begins each meeting telling panelists/participants not to enter comments into the chat. I believe this is improper and contrary to law. Not everyone can speak on every topic. Your chat comments are relevant and necessary. Ms. Semo has also recently been disabling the chat function on the YouTube live stream, preventing the Committee from receiving input from members of the public. Many members of the public submit comments through YouTube.

3. There still is no agenda for a meeting that starts in less than two days. This is improper. Please see my recommended topics below.

4. I will also be addressing the Foreseeable Harm Standard and calling back in after my three minutes are up. Time permitting, I will address OGIS continuing unlawful actions attempting to divert mediation requests to the Agency FOIA Public Liaison (due to OGIS being grossly underfunded), which is a separate, non-exclusive right under the FOIA. Lack of mediation impacts FOIA requests and agencies alike as litigation cases and costs are skyrocketing, which mediation is meant to prevent. Then OGIS is cookin' the books in its annual *Ombuds Reports*. *See* Mandatory Right to OGIS Dispute Resolution - OGIS Malfeasance 20220616. *See also* The FOIA Ombudsman, Understanding the Office of Government Information Services (part 2/4) with the following statement, contrary to the FOIA statute:

“If we determine that the issue raised by the requester can best be resolved by communicating with a FOIA Public Liaison (FPL) or FOIA requester service center, and if the requester has not yet attempted to communicate with the agency, we will encourage them to do so before OGIS reaches out on their behalf.”

4. My goal is to work with OGIS and DOJ OIP to improve FOIA processes for everyone. That takes funding, which NARA and DOJ refuse to provide.

With my respect,

Robert Hammond

From: foiacompliance@gmail.com <foiacompliance@gmail.com>

Sent: Tuesday, October 18, 2022 9:14 PM

To: foiacompliance@gmail.com; Vanita.Gupta19@usdoj.gov; debra.wall@nara.gov

Cc: 'OGIS' <OGIS@nara.gov>; 'FOIA Advisory Committee' <foia-advisory-committee@nara.gov>

Subject: Agenda Input/Comments to 3 Nov and 1 Dec Chief FOIA Officers Council and FOIA Advisory Committee Meetings

[Best Viewed as HTML. See attached.]

Greetings Chief FOIA Officers, FOIA Advisory Committee, FOIA

professionals, media, interested parties.

Upcoming Events

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Chief FOIA Officers Council Meeting. Thursday, November 3, 2022 from 10:00 AM to 12:30 PM EDT.

FOIA Advisory Committee Meeting. Thursday, December 1, 2022 - 10:00 a.m. to 1:00 p.m. EDT

Agenda Input/Comments.

With the Chief FOIA Officers Council meeting and FOIA Advisory Committee meetings just around the corner, there is still time to have matters of interest to you considered for the agendas through OGIS and DOJ OIP. The FOIA Advisory Committee has expressed interest in “crowd sourcing” input to supplement focus areas for the 2022 -2024 term.

Please provide meeting agenda input and comments to:

- ogis@nara.gov, Subject Chief FOIA Officers Council
- foia-advisory-committee@nara.gov
- FOIACompliance@gmail.com (for information)

I would like to see a discussion of:

- The requirement to post contemporaneous FOIA Logs in reading rooms.
- Disestablishment of FOIAonline, preservation of records, and agency replacement plans.
- Decertification of FOIA.gov data and DOJ system replacement by an effective FOIA portal and case management system available to all federal agencies.
 - In meeting its statutory mandate, I believe that DOJ should fund a best of breed case management system. If it uses commercial software, such software should be placed on a GSA IT Schedule where all federal agencies may purchase seats/licenses at significantly reduced prices. This creates economies of scale and negates the additional cost of agencies having to exchange only rudimentary data in local systems with FOIA.gov through a current draft Application Programming Interface (API). Agencies should have input through a configuration management board.
 - DOJ.gov data is knowingly massively false and unusable for any purpose whatsoever as are some agency annual FOIA reports and

raw data.

- Line items for FOIA in every agency budget detailing how that funding would be used (for example to decrease backlogs, acquire information technology, potentially increase grade structure, professional training/certifications, and career path enrichment).
 - As an aside, Defense Logistics Agency, who has a massive worldwide logistics support and contracting mission, placed records management and FOIA under Information Operations (where the data is) and then configured it's FOIA operations to process simple requests in one day.

If you suggest a topic not covered by my public comments below, I will research it.

For convenience, I have placed thirty-nine of my most relevant comments to Document Cloud, which may spark additional meeting topics.

These public comments are also posted to OGIS websites in PDF format with bookmarks and hyperlinked outlines. Document Cloud posts documents last in first out with only twenty-five documents per page. No bookmarks.

<https://www.documentcloud.org/app?q=%2Buser%3Arobert-hammond-106693%20>

| | |
|---|------------------------------------------------------------------------------------------------------------|
| 1 | 2022- 2024 FOIA Advisory Committee Bylaws - Recommended Changes |
| 2 | 2022- 2024 FOIA Advisory Committee Inaugural Meeting. DOJ OIP OGIS Grossly Underfunded |
| 3 | All Panelist Chat to June 9 2022 FOIA Advisory Committee Meeting. OGIS DOJ Funding + Missing FOIA.gov Data |
| 4 | DOD FOIA Misconduct Part IV. FY 2018 Appeals Disappeared + DOJ OIP & OGIS Underfunded, Thus Ineffective |
| 5 | DOD FOIA Misconduct Part V. Navy FY 2018 Appeals Dispositions Bases Not Reported |
| 6 | DOD Massive False FOIA Reporting. Part 1. Letter to SECDEF, Complaint to DOJ OIG |
| 7 | DOD MASSIVE FALSE REPORTING PART II + Still Interested Abuse. Updated July 27, 2022 |
| 8 | DOD Massive False Reporting Part III. 5-year Late Acknowledgements Unusual Circumstances Abuse + |
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| 9 | DOD' Cites Change to CFR 32 CFR part 286.4 as Unlawful Basis for Omitting OGIS Mediation Rights |
| 10 | DOJ OIP (Inaccurate) CFO Report Assessment 2022 |
| 11 | DOJ OIP Compliance Inquiries |
| 12 | Failure - FOIA Compliance Oversight & Funding. Part 2. No Joking Matter |
| 13 | FOIA Line-Item Budgets Now. Let the citizens be heard. Retire FOIA Bob. |
| 14 | FOIAonline - Recommended System Changes |
| 15 | Foreseeable Harm Standard. DOJ OIP Misinformation + Navy Misconduct and Idiocy? |
| 16 | DOJ OIP Improper and Unlawful Standard Glomar Responses With Implicit (b)(1) & (b)(7) |
| 17 | Hammond FOIA Public Comments Posted to Document Cloud |
| 18 | Hammond Questions Comments for September 8 2022 Meeting. OGIS and DOJ OIP Lack of Funding w.attach1 |
| 19 | Hammond Recommendations and Chat Comments to 4.7.2022 FOIA Advisory Committee Meeting |
| 20 | HOT! Semo OGIS. Budget Numbers do not Comport w. NARA Published Budgets! |
| 21 | Mandatory Right to OGIS Dispute Resolution - OGIS Malfeasance 20220616 |
| 22 | Moot Appellate Determinations |
| 23 | NARA FOIA & Financial Malfeasance \$789,730 + Alteration of Records and Loss of Public Trust |
| 24 | NARA FY 2022 Data Stripped From FOIA.gov |
| 25 | NARA, PLEASE FUND OGIS!! (PART 1). Robert Hammond September 9, 2021 Speaker Notes |
| 26 | Navy FY 2018 Appeals Dispositions Bases Not Reported |
| 27 | OGIS & DOJ OIP Misstate Recommendation to Post FOIA Logs - Why |
| 28 | OGIS Funding and Case Accountability Logs |
| 29 | OGIS Negligence Generally & Improper June 29, 2022 FOIA Meeting |
| 30 | OGIS Posting Policy for Public Comments |
| 31 | Posting FOIA Logs. Tech Committee Recommendation #2. FOIA Ombudsman Inaccurate Citation |
| 32 | Preserve FOIAonline Records + Decertify FOIA.gov + Audit NARA + Post FOIA Logs |
| 33 | QUESTIONS for June 29, 2022 OGIS Annual FOIA Meeting v2 |
| | Response to Hon. David S. Ferriero June 10 2021 Comments to FOIA |

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| 34 | Advisory Committee |
| 35 | Sample FOIA Template to Combat Agency Misconduct 20220616 |
| 36 | Senator Grassley - DOJ OIP's Position Doesn't Pass the "Common Sense Test" |
| 37 | Senators Unite to Slam FOIA Compliance + POGO |
| 38 | Subpoena Threat and Congressional Demand for OGIS to Release Records. OMB Kills Recommendations |
| 39 | Violations of the ADA in FOIA Redactions, Simple Solution |

With my deep respect,

Robert Hammond

ATTACHMENT E

Hammond Sample Public Comments
to Open FOIA Meetings.

<https://www.documentcloud.org/app?q=%2Buser%3>

[Arobert-hammond-106693%20](#)

| # | <p style="text-align: center;">Hammond Public Comments. Document Cloud Alphabetical (25 per page on web, not alphabetical)</p> <p style="text-align: center;">https://www.documentcloud.org/app?q=%2Buser%3Arobert-hammond-106693%20</p> |
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