

MACKINAC CENTER  
LEGAL FOUNDATION

January 5, 2021

Clerk of the Court of Claims  
Hall of Justice  
925 W. Ottawa St.  
Lansing, MI 48909

RE: Written Claim per MCL 600.6431 against Michigan State University.

Dear Clerk:

This verified letter is to fulfill the requirements of MCL 600.6431(1) as a written notice against Michigan State University by the Mackinac Center, by and through its employee, Jarrett Skorup. The nature of the claim is for delays and denials of a Freedom of Information Act ("FOIA") request which was filed by the Mackinac Center on June 26, 2020.

The Mackinac Center seeks complete fulfillment of this request, along with penalties, attorney fees, and other costs.

Sincerely,

Jarrett Skorup

**I declare that the statements above are true to the best of my information, knowledge, and belief.**

Dated: January 5, 2021

  
Jarrett Skorup

Subscribed and sworn to by Jarrett Skorup before me on the 5th day of January, 2021.

Signature 

Notary Public, State of Michigan

County of Ingham

My Commission Expires 07-29-2025

Acting in the County of Midland

STEPHEN DELIE  
Notary Public, State of Michigan  
County of Ingham  
My Commission Expires 07-29-2025  
Acting in the County of Midland

STATE OF MICHIGAN  
COURT OF CLAIMS

**THE MACKINAC CENTER FOR PUBLIC  
POLICY, a nonprofit Michigan Corporation**

Case No.: 20-000258-MZ

**Plaintiff,**

v.

**Hon. Michael Kelly**

**MICHIGAN STATE UNIVERSITY, a state  
public body.**

**First Amended Complaint**

**Defendant.**

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**Patrick J. Wright (P54052)**  
**Derk A. Wilcox (P66177)**  
**Stephen A. Delie (P80209)**  
Mackinac Center for Public Policy  
Attorneys for Plaintiff  
140 West Main Street  
Midland, MI 48640  
(989) 631-0900 – voice  
(989) 631-0964 – fax

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**PLAINTIFF'S FIRST AMENDED COMPLAINT**

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There is no other pending or resolved civil action arising out of the same transaction or occurrence alleged in the complaint.

**NOW COMES** Plaintiff, The Mackinac Center for Public Policy, and for its First Amended Complaint alleges and states as follows:

**INTRODUCTION**

The plaintiff, Mackinac Center for Public Policy (the “Mackinac Center”) is a nonprofit organization “dedicated to improving the quality of life for all Michigan residents by promoting

sound solutions to state and local policy questions.” To that end, the Mackinac Center routinely uses the Freedom of Information Act (“FOIA”) to obtain relevant documents from state and local governments.

On June 26<sup>th</sup>, 2020, the Mackinac Center made a routine request to Michigan State University (“MSU”), seeking e-mail correspondence relating to Dr. Stephen Hsu. MSU responded on July 7, 2020, with a fee estimate of \$230.00. The Mackinac Center paid the required 50% deposit of \$115.00, which MSU received on July 20<sup>th</sup>, 2020. In its July 7<sup>th</sup> request, MSU estimated it would take six (6) weeks to process the Mackinac Center’s request, despite estimating only six (6) hours of labor would be necessary.

On August 31<sup>st</sup>, 2020, MSU wrote the Mackinac Center, informing the Center that the records it had requested had been located and gathered, but that the volume of the records were greater than anticipated. MSU, without legal authority, then revised its cost estimate to reflect an additional 11 hours of labor and additional costs of \$250.00. MSU also extended the date it anticipated being able to respond to the Mackinac Centers request by an additional eight (8) weeks.

On November 4<sup>th</sup>, MSU again wrote the Mackinac Center, partially granting and partially denying its request. MSU then, once again unilaterally extended its deadline to respond to December 4, 2020. Finally, on December 4<sup>th</sup>, MSU then once again issued a delay to December 23, 2020. Ultimately, records were released on December 23<sup>rd</sup>, following the filing of the Mackinac Center’s initial complaint.

Despite all requested deposits being paid, MSU took over five (5) months for records that, by MSU’s most-recent admission, should have taken no longer than seventeen (17) hours to produce. In addition, those records that were released were excessively redacted beyond the scope of what is permitted by the FOIA.

## PARTIES, JURISDICTION, AND VENUE

1. Plaintiff, the Mackinac Center for Public Policy (the “Mackinac Center”), is a Michigan nonprofit corporation headquartered in Midland County, Michigan.
2. Defendant, Michigan State University (“MSU”), is a state university and public body which, upon information and belief, is headquartered in East Lansing, Ingham County, Michigan.
3. Venue is proper pursuant to MCL 15.240(1)(b).
4. Pursuant to MCL 15.240(5), this action should be “assigned for hearing and trial or for argument at the earliest practicable date and expedited in every way.”
5. Pursuant to MCL 600.6419(1)(a), the Court of Claims has jurisdiction over this claim.

## VIOLATIONS OF THE FREEDOM OF INFORMATION ACT

6. The Plaintiff hereby incorporates the preceding paragraphs as if fully restated herein.
7. On June 26, 2020, Mackinac Center employee Jarrett Skorup submitted a FOIA request to LARA for the following records:

"Pursuant to the Michigan Compiled Laws Section 15.231 et seq., and any other relevant statutes or provisions of your agency's regulations I am making the following Freedom of Information Act request.

Any emails to or from the president of Michigan State University that mention “Hsu” from Feb. 1, 2020 to June 26, 2020.

### **Exhibit A, Mackinac Center FOIA Request.**

8. On July 7, 2020, MSU responded to the Mackinac Center’s FOIA request by providing an estimate of the costs necessary to fulfill the request. **Exhibit B, MSU July Letter.** The requested estimate of total costs was \$230.00. MSU also estimated that it would take six (6) hours to fulfill the request.
9. The Mackinac Center paid 50% of the estimated fee as required by MCL 15.234(8).

10. On August 31, 2020, MSU sent correspondence indicating that the request was more burdensome to fulfill than initially anticipated. **Exhibit C, MSU August Letter.** MSU then proceeded to request an additional \$350.00 to fulfill the request. *Id.*
11. MSU also indicated that it would require an additional 8 weeks to complete the estimated additional 11 hours of work. *Id.*
12. The FOIA does not provide a process by which a public body may amend its original good-faith request for a deposit, nor does it permit a public body to extend the time it estimates will be necessary to fulfill the request. See generally, MCL 15.231 *et seq.* Instead, a public body would be permitted to charge any additional expenses as part of its final billing before releasing records. See generally, MCL 15.234.
13. MSU's August 31, 2020 letter was therefore an illegal extension and increase in fees.
14. Despite this, the Mackinac Center paid the requested deposit.
15. On November 4<sup>th</sup>, 2020, MSU sent the Mackinac Center correspondence indicating that it was granting the Center's request with respect to non-exempt information. **Exhibit D, MSU November Letter.** This partial-grant-partial denial was not accompanied by any records, and was sent a full ninety-three (93) business days after receipt of the Center's FOIA request. MSU also unilaterally extended its date to provide records to December 4<sup>th</sup>, 2020.
16. On December 4<sup>th</sup>, 2020, MSU again sent correspondence extending its estimated date of production. This new date is December 23<sup>rd</sup>, 2020, almost 6 months after the date the initial request was filed. **Exhibit E, MSU December Letter.**
17. MSU released heavily redacted records on December 23<sup>rd</sup>, 2020. **Exhibit F, MSU Final Response.**
18. MSU's redactions are far beyond the scope permitted by FOIA. Examples include:

- a. Redacting excessive personal information, including the mere names of those who sent e-mails that were contained in the responsive records;
- b. Redacting university signatures, e-mail addresses, netIDs, and telephone numbers pursuant to MCL 15.243(1)(u), (y), and (z), on the grounds of protecting the ongoing security of a public body;
- c. Redacting frank communications pursuant to MCL 15.243(1)(m), despite extraordinary public interest in accessing those communications;
- d. Redacting portions of records to the extent that it is impossible to identify what exemption is being applied, and whether that exemption is being applied properly.

19. MCL 15.231(2) states:

It is the public policy of this state that all persons, except those persons incarcerated in state or local correctional facilities, are entitled to fully and complete information regarding the affairs of government and the official acts of those who represent them as public officials and public employees, consistent with this act. The people shall be informed so that they may participate in the democratic process.

20. MCL 15.234(8) indicates that a public body may respond to a FOIA request with a good faith estimate as to the cost of the FOIA request. However, the statute further states:

The response shall also contain a best efforts estimate by the public body regarding the time frame it will take the public body to comply with the law in providing the public records to the requestor. The time frame estimate is nonbinding upon the public body, but the public body shall provide the estimate in good faith and strive to be reasonably accurate and to provide the public records in a manner based on this state's policy under [MCL 15.231] and the nature of the request in the particular instance.

21. Our Attorney General, on December 12, 2017, issued Opinion No. 7300 interpreting the requirements of MCL 15.234(8):

It is my opinion, therefore, that a public body's "best efforts estimate" under subsection 4(8) of FOIA, as to the time it will take to fulfill a request for public records, must be a calculation that contemplates the public body working diligently to fulfill its obligation to produce records to the requestor. The estimate must be comparable to what a reasonable person in the same circumstances as the public body would provide for fulfilling a similar public records request. In addition, under subsection 4(8), the best efforts estimate must be made in "good

faith,” that is, it must be made honestly and without the intention to defraud or delay the requestor.

22. The requested materials were simply e-mails, and should have been easily reviewed and provided, even remotely.
23. MSU failed to provide the requested records for approximately 5 months, despite estimating the time required to process this request being originally 6 hours, and now 17 hours.
24. Had MSU devoted as little as 11 minutes of each business day from June 26<sup>th</sup> to November 13<sup>th</sup>, the Center would have received the requested records. MSU’s failure to do so constitutes an unreasonable delay, and demonstrates that MSU was not working diligently to fulfill the Center’s request.
25. An unreasonable delay in providing FOIA documents is a denial under MCL 15.235, MCL 15.240(1), and MCL 15.240(7).
26. MCL 15.234(9) indicates a public body that does not timely respond to a FOIA request under MCL 15.235(2) shall reduce the charges for any labor rate at a rate of 5% a day with a maximum of 50% if the late response was willful or if the request was clearly identified as a FOIA request.
27. MSU has recognized this, as demonstrated by its refund of the entirety of the Center’s processing fee. **Exhibit F.**
28. Despite this, MSU’s actions regarding this delay in providing the records responsive to the Mackinac Center’s request are arbitrary and capricious under MCL 15.240(7), thereby subjecting MSU to a civil fine of \$1,000.00 payable to the general treasury and a separate \$1,000.00 to the Mackinac Center.
29. In addition, MSU’s actions regarding this delay in providing the records responsive to the Mackinac Center’s request constitute willful and intentional failure to comply under MCL 15.240b, thereby subjecting it to a civil fine of \$2,500 to \$7,500 payable to the state treasury.

30. In addition to the aforementioned illegal delays, MSU's excessive redactions constitute an independent ground for appeal.
31. MSU's response to the Mackinac Center's appeal is contrary to law, as it misapplies the cited FOIA exemptions.
32. MCL 15.243(1)(m) permits a public body to exempt:

Communications and notes within a public body or between public bodies of an advisory nature to the extent that they cover other than purely factual materials and are preliminary to a final agency determination of policy or action. This exemption does not apply unless the public body shows that in the particular instance the public interest in encouraging frank communication between officials and employees of public bodies clearly outweighs the public interest in disclosure.
33. MSU has the burden of showing that the frank communication exemption applies, including why the public's interest in non-disclosure clearly outweighs the public's right to receive records in the particular instance. *Bukowski v City of Detroit*, 478 Mich 268 (2007); *Herald Co, Inc v Eastern Michigan University Bd of Regents*, 265 Mich App 185 (2005) (citations omitted).
34. Even assuming MSU correctly classified redacted and withheld e-mails as advisory communications preliminary to a final agency determination, MSU cannot show that the public interest in promoting frank communications clearly outweighs the public's interest in disclosure in this instance.
35. The communications sought, and the advisory communications contained therein, relate directly to University's response to a public controversy, including the reasoning intended to support that response.
36. The public interest in learning how the MSU makes decisions about its high-level officials is overwhelming on its face. This particular matter has garnered two Wall Street Journal articles,<sup>1</sup>

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<sup>1</sup> See, e.g., <https://www.wsj.com/articles/the-ideological-corruption-of-science-11594572501>;  
<https://www.wsj.com/articles/a-twitter-mob-takes-down-an-administrator-at-michigan-state-11593106102>.



and has resulted in what appear to be hundreds of e-mails being sent to MSU, both opposed and in favor of MSU's decision. **See, e.g., Exhibit G, Selected Responsive E-mails.**

37. In order to overcome this extreme public interest, the public's interest in non-disclosure must "clearly outweigh" the public's interest in disclosure.
38. MSU cannot demonstrate that the public's interest in non-disclosure clearly outweighs the public's interest in disclosure, particularly in light of the fact that the public is currently without meaningful information as to how decisions are being made by MSU officials.
39. Even if the Court were to conclude that the public's interest in non-disclosure clearly outweighs the public interest in disclosure, MSU nevertheless failed to follow the FOIA by redacting large portions of e-mail communications. Under the FOIA, MSU remains obligated to produce any purely factual material within advisory communications. *Bukowski v City of Detroit*, 478 Mich 268 (2007). Upon information and belief, it failed to do so.
40. MSU also exempted working group e-mail addresses pursuant to MCL 15.243(1) (u), (y), (z) stating, "University signatures, email addresses, netIDs, and a telephone number have been redacted under one or more of Sections 13(1)(u),(y), and (z), which allow for the withholding of information related to the ongoing security of a public body." **Exhibit F.**
41. The Center objects to these redactions as not genuinely relating to MSU's ongoing security, or the security or safety of persons or property.
42. It is MSU's burden to state the justifications for a FOIA denial with specificity. MCL 15.235(5)(a)-(c); *Peterson v Charter Township of Shelby*, 2018 WL 2024578 (Mich Ct App).
43. Both MCL 15.243(1)(u) and (y) directly relate to the security and safety of persons, property, and the public body. MCL 15.243(1)(z) similarly relates to identify a person that may be exposed to a cybersecurity incident, and plans and hardware related to preventing and responding to cybersecurity incidents.

44. Upon information and belief, no Michigan Court has addressed either of these exemptions, nor defined the meaning of “safety or security” in connection with them. The FOIA also does not define these terms. See generally, MCL 15.232.
45. When a statute fails to define a term, a court’s role is to “glean legislative intent from the plain meaning of statutory language.” *In re Estate of Erwin*, 503 Mich 1, 9 (2018) (citation omitted). To do so, a court’s first point of reference is the dictionary, with common understanding and traditional legal usage guiding the court’s interpretation. *Id.*, at p. 10 (citation omitted).
46. Webster’s online dictionary defines security as the “quality or state of being secure.”<sup>2</sup> “Secure” is defined as “free from danger.”<sup>3</sup> “Danger” is defined as “exposure or liability to injury, pain, harm, or loss.”<sup>4</sup>
47. The Cambridge Dictionary similarly defines security as “protection of a person, building, organization, or country against threats such as crime or attacks by foreign countries.”<sup>5</sup>
48. MSU’s claim that the disclosure of e-mail addresses, signatures, netIDs, and telephone number would threaten the security of MSU, or of individual employees, cannot be justified under the above definitions. It strains credulity to contend that a person can be physically endangered by the exposure of any of the aforementioned information.
49. The same is true regarding MSU’s application of MCL 15.243(1)(z). MSU has offered no explanation as to how disclosing this information poses a cybersecurity risk, or otherwise exposes MSU’s cybersecurity-related practices.
50. MSU also redacted certain non-MSU e-mail addresses and names pursuant to MCL 15.243(1)(a), which states:

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<sup>2</sup> <https://www.merriam-webster.com/dictionary/security?src=search-dict-hed>.

<sup>3</sup> <https://www.merriam-webster.com/dictionary/secure>.

<sup>4</sup> <https://www.merriam-webster.com/dictionary/danger>.

<sup>5</sup> <https://dictionary.cambridge.org/us/dictionary/english/security>.

A public body may exempt from disclosure as a public record under this act any of the following... Information of a personal nature if public disclosure of the information would constitute a clearly unwarranted invasion of an individual's privacy.

51. MSU cannot demonstrate that the public interest in full disclosure of records is clearly outweighed by privacy interests in this instance.
52. Michigan Courts have previously ruled that the release of the names and addresses of private security guard employees, the names of public employees who had been called before a grand jury or met with an FBI investigation, the names and home addresses of various public employees and candidates for public office, and the names of student-athletes identified in university incident reports do not constitute clearly unwarranted invasions of privacy. *International Union, United Plant Guard Workers of America (UPGWA) v Department of State Police*, 118 Mich App 2952 (1982); *Detroit Free Press v City of Warren*, 250 Mich App 164 (2002)(citation omitted); *Michigan State Employees Ass'n v Department of Management and Budget*, 135 Mich App 248 (1984)(citation omitted); *Tobin v Michigan Civil Service Com'n*, 416 Mich 661 (1982); *Hearld Co v City of Bay City*, 463 Mich 111 (2000); *ESPN, Inc v Michigan State University*, 311 Mich App 662 (2015) (citation omitted).
53. Disclosure of the e-mail addresses at issue in this particular instance are less invasive than the disclosure of the information described immediately above, thereby justifying their release.
54. The identity of those individuals contacting MSU regarding its response to this matter are likewise information that is of significant public interest, as it shows the positions of those individuals who either support or oppose MSU's response. This is relevant, as it will help the public understand how this matter is being viewed by students, other academics, and by the public. Similarities or differences in responses among these groups helps to inform the public regarding the potential logic underlying MSU's response.

55. Pursuant to MCL 15.240(6), the Center, if it prevails, is entitled to attorneys' fees and costs:

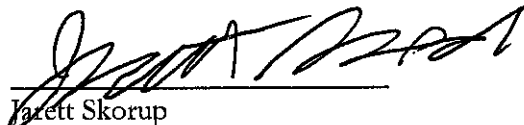
If a person asserting the right to inspect, copy, or receive a copy of all or a portion of a public record prevails in an action commenced under this section, the court shall award reasonable attorneys' fees, costs, and disbursements. If the person or public body prevails in part, the court may, in its discretion, award all or an appropriate portion of reasonable attorneys' fees, costs, and disbursements. The award shall be assessed against the public body liable for damages under subsection (7).

**RELIEF REQUESTED**

Plaintiff, Mackinac Center for Public Policy, respectfully requests that this Court order Defendant, Michigan State University, to provide all documents sought in the FOIA request; apply the full penalties available under MCL 15.234(9), MCL 15.240(7), and MCL 15.240b; award attorneys' fees and costs under MCL 15.240(6); and award any other relief this Court determines to be just and equitable to remedy MSU's delays in providing the requested information and causing the need to bring this suit.

**I declare that the statements above are true to the best of my information, knowledge, and belief.**

Dated: Jan. 5, 2021

  
\_\_\_\_\_  
Jarett Skorup  
Director of Marketing and Communications  
Mackinac Center for Public Policy

Subscribed and sworn to by Jarett Skorup before me on the 5th day of January, 2021.

STEPHEN DELIE  
Notary Public, State of Michigan  
County of Ingham  
My Commission Expires 07-29-2025  
Acting in the County of Midland

# Exhibit A

## Delie, Steve

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**From:** Skorup, Jarrett  
**Sent:** Thursday, November 5, 2020 11:10 AM  
**To:** Delie, Steve  
**Subject:** Fw: Your FOIA Request to MSU

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**From:** FOIA <foia@msu.edu>  
**Sent:** Monday, July 27, 2020 5:38 PM  
**To:** Skorup, Jarrett  
**Subject:** Your FOIA Request to MSU

Communications  
Policy

Dear Jarrett Skorup:

This is written in reply to the voicemail message that you left today at the MSU FOIA Office, as well as your July 20<sup>th</sup> email below.

Please be advised that check #39535 in the amount of \$115.00 from the Mackinac Center for Public Policy was received in this Office on July 20, 2020, for the processing of your FOIA request MSUF035320. Pursuant to the best efforts estimate provided to you in our July 7, 2020, FOIA Fee and Deposit Notice, we anticipate responding to your request on or before six weeks from the date the fee deposit was received, that being Monday, August 31, 2020.

Pursuant to Section 4(4) of the Michigan Freedom of Information Act (MIFOIA), the University's procedures and guidelines for processing MIFOIA requests can be found at <http://foia.msu.edu>.

Michigan State University  
Freedom of Information Act Office  
408 W. Circle Drive  
Room 1 Olds Hall  
East Lansing, MI 48824  
517-353-3929/telephone  
517-353-1794/fax  
[foia@msu.edu](mailto:foia@msu.edu)

MSUF035320

**From:** Skorup, Jarrett <Skorup@mackinac.org>  
**Sent:** Monday, July 20, 2020 11:03 AM  
**To:** FOIA <foia@msu.edu>  
**Subject:** RE: FOIA - Stephen Hsu

I am following up on this request.

**From:** Skorup, Jarrett  
**Sent:** Friday, June 26, 2020 2:50 PM  
**To:** 'foia@msu.edu' <foia@msu.edu>  
**Subject:** FOIA - Stephen Hsu

FOIA: Michigan State University

June 26, 2020

FOIA REQUEST FOR EMAILS ABOUT STEPHEN HSU

To Whom It May Concern:

Pursuant to the Michigan compiled Laws Section 15.231 et seq., and any other relevant statutes or provisions of your agency's regulations I am making the following Freedom of Information Act request.

- Any emails to or from the president of Michigan State University that mention "Hsu" from Feb. 1, 2020 to June 26, 2020.

Please send the materials requested to the attention of Jarrett Skorup at the following address, fax number, or via e-mail at [skorup@mackinac.org](mailto:skorup@mackinac.org)<<mailto:skorup@mackinac.org>>.

Mackinac Center for Public Policy  
P.O. Box 568  
Midland, MI 48640  
Fax: 989-631-0964  
Phone: 989-631-0900  
Jarrett Skorup  
Mackinac Center

Jarrett Skorup  
Director of Marketing and Communications  
Mackinac Center for Public Policy  
[www.mackinac.org](http://www.mackinac.org)  
989-631-0900

# Exhibit B



**MICHIGAN STATE  
UNIVERSITY**

DATE: July 7, 2020

TO: Jarrett Skorup  
Director of Marketing and Communications  
Mackinac Center for Public Policy  
skorup@mackinac.org

FROM: Rebecca Nelson, Director and Freedom of Information Act (FOIA) Officer  
Michigan State University FOIA Office *Rebecca Nelson*

SUBJECT: FOIA Fee and Deposit Notice

This is written with regard to the FOIA request that you emailed to this Office on June 26, 2020.

The processing of your request thus far has involved significant labor. We estimate that searching for, gathering, and reviewing records responsive to your request to determine if information exempt from public disclosure under the Michigan Freedom of Information Act (MIFOIA), must be separated from that which is not exempt, will require upwards of six (6) hours, incurring fees likely to exceed \$230.00. Fees will not be waived since failure to charge same would result in unreasonably high costs to the University. An itemization of this estimate accompanies this letter. This serves as an approximation only, and does not guarantee or limit the final, total fees which may be incurred and assessed. Therefore, pursuant to Section 4(2) of the MIFOIA, we require that you remit a deposit prior to our further processing your request. Should you remit the required deposit, we anticipate responding to your request on or before six (6) weeks from the date the deposit is received.



**FREEDOM OF  
INFORMATION ACT  
OFFICE**

**Michigan State  
University**

408 West Circle Drive  
Room 1 Olds Hall  
East Lansing, MI 48824  
517-353-3929  
Fax: 517-353-1794  
foia@msu.edu  
<http://foia.msu.edu>

If you wish to pursue the processing of your request, and pay the fees incurred, please send a check made payable to "Michigan State University" in the amount of \$115.00 to the Freedom of Information Act Office, 408 West Circle Drive, Room 1 Olds Hall, or notify us in writing if you wish to modify or withdraw your request. The University will not process your request until a deposit is received by our Office. Moreover, Section 4(14) of the MIFOIA requires that the deposit be received no later than Monday, August 24, 2020, or your request will be considered abandoned, and processing of it no longer required. Should you have any questions regarding fees, please contact us. Pursuant to Section 4(4) of the MIFOIA, the University's procedures and guidelines for processing MIFOIA requests can be found at <http://foia.msu.edu>.

Attachment  
MSUF035320

MSU FOIA FEE ESTIMATE ITEMIZATION FORM -- July 7, 2020 -- Skorup FOIA Request MSUF035320

<i>Category of Costs/Description</i>	<i>Hourly Wage</i>	<i>Benefits % Multiplier Used</i>	<i>Hourly Wage with Benefits</i>	<i>Estimated Time (Hours)</i>	<i>Amount</i>
4 (1) (a) Searching for, locating and examining responsive records <i>[Shall not charge more than the hourly wage of lowest-paid employee capable of searching for, locating and examining the public records in the particular instance regardless of whether that person is available or who actually performs the labor; labor costs shall be estimated and charged in increments of 15 minutes or more, with all partial time increments rounded down.]</i>	\$28.95	40%	\$40.53	3	\$121.59
4 (1) (b) Review directly associated with the separating and deleting of exempt from nonexempt information <i>[For services performed by an employee of the public body, the public body shall not charge more than the hourly wage of its lowest-paid employee capable of separating and deleting exempt information from nonexempt information in the particular instance as provided in section 14, regardless of whether that person is available or who actually performs the labor. If a public body does not employ a person capable of separating and deleting exempt information from nonexempt information as determined by the public body's FOIA coordinator, it may treat necessary contracted labor costs used for the separating and deleting of exempt information from nonexempt information in the same manner as employee labor costs if it clearly notes the name of the contracted person or firm on this itemization. Total labor costs calculated under this subdivision for contracted labor costs shall not exceed an amount equal to 6 times the state minimum hourly wage rate. Labor costs under this subdivision shall be estimated and charged in increments of 15 minutes or more, with all partial time increments rounded down.]</i>	\$21.29	40%	\$29.81	3.75	\$111.79
4 (1) (c) Nonpaper physical media costs <i>[The actual and most reasonably economical cost of the computer discs, computer tapes, or other digital or similar media. The requestor may stipulate that public records be provided on nonpaper physical media, electronically mailed, or otherwise electronically provided in lieu of paper copies. This subdivision does not apply if public body lacks the technological capability necessary to provide records on the particular nonpaper physical media stipulated in the particular instance.]</i>					
4 (1) (d) Cost of paper copies <i>[Actual total incremental cost of necessary duplication or publication, not including labor. The cost of paper copies shall be calculated as a total cost per sheet of paper, itemized to show both cost per sheet and number of sheets provided. The fee shall not exceed 10 cents per sheet of paper for copies of public records made on 8-1/2- by 11-inch paper or 8-1/2- by 14-inch paper. A public body shall utilize the most economical means available, including double-sided printing, if cost saving and available.]</i>					
4 (1) (e) Duplication or publication, including making paper copies, making digital copies, or transferring digital public records to be given to the requestor on nonpaper physical media or through the internet or other electronic means as stipulated by the requestor <i>[Shall not charge more than the hourly wage of lowest-paid employee capable of necessary duplication or publication in the particular instance, regardless of whether that person is available or who actually performs the labor.; labor costs under this subdivision shall be estimated and charged in time increments of the public body's choosing, with all partial time increments rounded down.]</i>					
4 (1) (f) Cost of mailing <i>[Actual cost of mailing, for sending the public records in a reasonably economical and justifiable manner; shall not charge more for expedited shipping or insurance unless stipulated by requestor, but may charge for the least expensive form of postal delivery confirmation when mailing public records.]</i>					

**ESTIMATE TOTAL**

**\$233.38**

**FEE DEPOSIT REQUIRED**

**\$115.00**

*When calculating labor costs under (1) (a), (b) or (e), fee components shall be itemized in a manner that expresses both the hourly wage and the number of hours charged. The public body may also add up to 50% to the applicable labor charge amount to cover or partially cover the cost of fringe benefits if it clearly notes the percentage multiplier used. Subject to the 50% limitation, the public body shall not charge more than the actual cost of fringe benefits, and overtime wages shall not be used in calculating the cost of fringe benefits. Overtime wages shall not be included in the calculation of labor costs unless overtime is specifically stipulated by the requestor and clearly noted in this detailed itemization.*

# Exhibit C

**MICHIGAN STATE  
UNIVERSITY**

DATE: August 31, 2020

TO: Jarrett Skorup  
Director of Marketing and Communications  
Mackinac Center for Public Policy  
skorup@mackinac.org

FROM: Rebecca Nelson, Director and Freedom of Information Act (FOIA) Officer  
Michigan State University FOIA Office *Rebecca Nelson*

SUBJECT: FOIA Fee and Deposit Notice Follow-up -- Record Volume Update

On June 26, 2020, you emailed a FOIA request to this Office for "Any emails to or from the president of Michigan State University that mention 'Hsu' from Feb. 1, 2020 to June 26, 2020." On July 20<sup>th</sup>, in response to our July 7<sup>th</sup> \$230.00 fee estimate, this Office received a \$115.00 fee deposit for the processing of your request.

The searching for and gathering of records responsive to your request has concluded, and the volume of those records is significantly greater than estimated. Record review to separate information exempt from public disclosure under the Michigan Freedom of Information Act (MIFOIA), from that which is not exempt, has begun. The foregoing processing has reached the initial six hour estimate, and hundreds of pages of emails have yet to be reviewed. Given that fees incurred have reached the initial \$230.00 estimate, we write to ask if you wish to proceed with the processing of your request, or halt the processing and receive only the records reviewed thus far. If you wish to halt the processing of your request, please advise us in writing, and we will finalize the records reviewed to date, and send them to you along with an invoice billing you for the balance of fees owed.



**FREEDOM OF  
INFORMATION ACT  
OFFICE**

**Michigan State  
University**

408 West Circle Drive  
Room 1 Olds Hall  
East Lansing, MI 48824  
517-353-3929  
Fax: 517-353-1794  
foia@msu.edu  
<http://foia.msu.edu>

If, instead, you wish to pursue the processing of all of the remaining records you seek, the following estimate is provided. Completing the processing of your request will involve significant labor; we estimate upwards of eleven (11) hours will be required, incurring fees likely to exceed \$350.00; this is in addition to the initial \$230.00 fee estimate, and the fees incurred to date. In completing the processing of your request, fees will not be waived since failure to charge same would result in unreasonably high costs to the University. An itemization of this estimate accompanies this letter. This serves as an approximation only, and does not guarantee or limit the final, total fees which may be incurred and assessed. Therefore, pursuant to Section 4(2) of the MIFOIA, we require that you remit an additional deposit prior to our completing the processing of your request. Should you remit the required deposit, we anticipate responding on or before eight weeks (8) from the date the deposit is received.

If you wish to pursue the processing of all records responsive to your request, and pay the fees incurred, please send a check made payable to "Michigan State University" in the amount of \$175.00 to the Freedom of Information Act Office, 408 West Circle Drive, Room 1 Olds Hall. The University will not complete the processing of the remaining records you seek until a deposit is received by our Office. Moreover, Section 4(14) of the MIFOIA requires that the deposit be received no later than Monday, October 19, 2020, or your request pertaining to the remaining records will be considered abandoned, and processing of it no longer required. Should you have any questions regarding fees, please contact us. Pursuant to Section 4(4) of the MIFOIA, the University's procedures and guidelines for processing MIFOIA requests can be found at <http://foia.msu.edu>.

Attachment  
MSUF035320

MSU FOIA FEE ESTIMATE ITEMIZATION FORM -- August 31, 2020 -- Skorup FOIA Request MSUF035320 -- follow-up; additional fee estimate

Category of Costs/Description	Hourly Wage	Benefits % Multiplier Used	Hourly Wage with Benefits	Estimated Time (Hours)	Amount
4 (1) (a) Searching for, locating and examining responsive records [Shall not charge more than the hourly wage of lowest-paid employee capable of searching for, locating and examining the public records in the particular instance regardless of whether that person is available or who actually performs the labor; labor costs shall be estimated and charged in increments of 15 minutes or more, with all partial time increments rounded down.]					
4 (1) (b) Review directly associated with the separating and deleting of exempt from nonexempt information [For services performed by an employee of the public body, the public body shall not charge more than the hourly wage of its lowest-paid employee capable of separating and deleting exempt information from nonexempt information in the particular instance as provided in section 14, regardless of whether that person is available or who actually performs the labor. If a public body does not employ a person capable of separating and deleting exempt information from nonexempt information as determined by the public body's FOIA coordinator, it may treat necessary contracted labor costs used for the separating and deleting of exempt information from nonexempt information in the same manner as employee labor costs if it clearly notes the name of the contracted person or firm on this itemization. Total labor costs calculated under this subdivision for contracted labor costs shall not exceed an amount equal to 6 times the state minimum hourly wage rate. Labor costs under this subdivision shall be estimated and charged in increments of 15 minutes or more, with all partial time increments rounded down.]	\$21.29	40%	\$29.81	11.75	\$350.27
4 (1) (c) Nonpaper physical media costs [The actual and most reasonably economical cost of the computer discs, computer tapes, or other digital or similar media. The requestor may stipulate that public records be provided on nonpaper physical media, electronically mailed, or otherwise electronically provided in lieu of paper copies. This subdivision does not apply if public body lacks the technological capability necessary to provide records on the particular nonpaper physical media stipulated in the particular instance.]					
4 (1) (d) Cost of paper copies [Actual total incremental cost of necessary duplication or publication, not including labor. The cost of paper copies shall be calculated as a total cost per sheet of paper, itemized to show both cost per sheet and number of sheets provided. The fee shall not exceed 10 cents per sheet of paper for copies of public records made on 8-1/2- by 11-inch paper or 8-1/2- by 14-inch paper. A public body shall utilize the most economical means available, including double-sided printing, if cost saving and available.]					
4 (1) (e) Duplication or publication, including making paper copies, making digital copies, or transferring digital public records to be given to the requestor on nonpaper physical media or through the internet or other electronic means as stipulated by the requestor [Shall not charge more than the hourly wage of lowest-paid employee capable of necessary duplication or publication in the particular instance, regardless of whether that person is available or who actually performs the labor.; labor costs under this subdivision shall be estimated and charged in time increments of the public body's choosing, with all partial time increments rounded down.]					
4 (1) (f) Cost of mailing [Actual cost of mailing, for sending the public records in a reasonably economical and justifiable manner; shall not charge more for expedited shipping or insurance unless stipulated by requestor, but may charge for the least expensive form of postal delivery confirmation when mailing public records.]					
<b>ESTIMATE TOTAL</b>					<b>\$350.27</b>
<b>REQUIRED</b>					<b>\$175.00</b>

When calculating labor costs under (1) (a), (b) or (e), fee components shall be itemized in a manner that expresses both the hourly wage and the number of hours charged. The public body may also add up to 50% to the applicable labor charge amount to cover or partially cover the cost of fringe benefits if it clearly notes the percentage multiplier used. Subject to the 50% limitation, the public body shall not charge more than the actual cost of fringe benefits, and overtime wages shall not be used in calculating the cost of fringe benefits. Overtime wages shall not be included in the calculation of labor costs unless overtime is specifically stipulated by the requestor and clearly noted in this detailed itemization.

# Exhibit D

**MICHIGAN STATE  
UNIVERSITY**

DATE: November 4, 2020

TO: Jarrett Skorup  
Director of Marketing and Communications  
Mackinac Center for Public Policy  
skorup@mackinac.org

FROM: Rebecca Nelson, Director and Freedom of Information Act (FOIA) Officer  
Michigan State University FOIA Office *Rebecca Nelson*

SUBJECT: FOIA Response

This is written in response to the FOIA request that you emailed to this Office on June 26, 2020, and for the processing of which this Office received fee deposits on July 20, 2020, and September 9, 2020.

Your request is granted with regard to information that is not exempt from public disclosure under the Michigan Freedom of Information Act (MIFOIA). That said, given the University's current alternate working arrangements, necessitated by extraordinary community health concerns, record processing times are extending beyond typically anticipated dates. Nevertheless, please be assured that we are working diligently to process your request as quickly as possible, and expect to send to you records or another update on or before Friday, December 4, 2020. We apologize for any inconvenience this unavoidable delay may cause.

The MIFOIA provides that when a public body denies all or a portion of a request, the requester may do one of the following: (1) submit an appeal of the determination to the head of the public body; or (2) commence a civil action in the court of claims to compel the public body's disclosure of the records. If you wish to seek judicial review of any denial, you must do so within 180 days of the date of this letter. If the court of claims orders disclosure of all or a portion of the public record(s) to which you have been denied access, you may receive attorneys' fees and, in certain circumstances, damages under the MIFOIA. Should you choose to file an appeal with the University regarding this response to your request, you must submit a written communication to this Office expressly stating that it is an "appeal" of this response. In your appeal, please state what records you believe should have been disclosed to you. You must also state the reasons you believe any denial of your MIFOIA request should be reversed. This Office will arrange for the processing and review of your appeal. Pursuant to Section 4(4) of the MIFOIA, the University's procedures and guidelines for processing MIFOIA requests can be found at <http://foia.msu.edu>.

MSUF035320



**FREEDOM OF  
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**Michigan State  
University**

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Fax: 517-353-1794  
[foia@msu.edu](mailto:foia@msu.edu)  
<http://foia.msu.edu>

# Exhibit E



**MICHIGAN STATE  
UNIVERSITY**

DATE: December 4, 2020

TO: Jarrett Skorup  
Director of Marketing and Communications  
Mackinac Center for Public Policy  
skorup@mackinac.org

FROM: Rebecca Nelson, Director and Freedom of Information Act (FOIA) Officer  
Michigan State University FOIA Office *Rebecca Nelson*

SUBJECT: FOIA Response Status Notice

This is written as follow-up to our November 4, 2020, response to the FOIA request that you emailed to this Office on June 26, 2020, and for the processing of which this Office received fee deposits on July 20, 2020, and September 9, 2020.

As we previously advised, your request is granted with regard to information that is not exempt from public disclosure under the Michigan Freedom of Information Act (MIFOIA). Please know that we continue to process records responsive to your request as expeditiously as possible. Nevertheless, given the University's current alternate working arrangements, necessitated by extraordinary community health concerns, record processing times are extending beyond typically anticipated dates. At this time, we expect to send to you records or another update on or before Wednesday, December 23, 2020. We apologize for any inconvenience this unavoidably extended response time may cause; fees assessed will be adjusted in consideration of the delay.



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<http://foia.msu.edu>

The MIFOIA provides that when a public body denies all or a portion of a request, the requester may do one of the following: (1) submit an appeal of the determination to the head of the public body; or (2) commence a civil action in the court of claims to compel the public body's disclosure of the records. If you wish to seek judicial review of any denial, you must do so within 180 days of the date of this letter. If the court of claims orders disclosure of all or a portion of the public record(s) to which you have been denied access, you may receive attorneys' fees and, in certain circumstances, damages under the MIFOIA. Should you choose to file an appeal with the University regarding this response to your request, you must submit a written communication to this Office expressly stating that it is an "appeal" of this response. In your appeal, please state what records you believe should have been disclosed to you. You must also state the reasons you believe any denial of your MIFOIA request should be reversed. This Office will arrange for the processing and review of your appeal. Pursuant to Section 4(4) of the MIFOIA, the University's procedures and guidelines for processing MIFOIA requests can be found at <http://foia.msu.edu>.

MSUF035320

# Exhibit F

**MICHIGAN STATE**  
**UNIVERSITY**

DATE: December 23, 2020

TO: Jarrett Skorup  
Director of Marketing and Communications  
Mackinac Center for Public Policy  
skorup@mackinac.org

FROM: Rebecca Nelson, Director and Freedom of Information Act (FOIA) Officer  
Michigan State University FOIA Office *Rebecca Nelson*

SUBJECT: FOIA Response

On June 26, 2020, you emailed to this Office your expansive FOIA request for "Any emails to or from the president of Michigan State University that mention 'Hsu' from Feb. 1, 2020 to June 26, 2020." On July 7<sup>th</sup>, we sent to you a notice advising that significant labor would be involved in processing your request, and that a fee deposit would be required to proceed. On July 20<sup>th</sup>, this Office received your fee deposit. On August 31<sup>st</sup>, we sent to you a letter advising that records identified as responsive to your request were significantly greater in volume than originally anticipated; that significantly greater labor would be involved in processing those records; that an additional fee deposit would be required to proceed; and that we anticipated responding on or before eight weeks from the date the additional deposit was received. That response date was estimated in compliance with Section 4(8) of the Michigan Freedom of Information Act (MIFOIA), which provides that "The response must also contain a best efforts estimate by the public body regarding the time frame it will take the public body to comply with the law in providing the public records to the requestor. The time frame estimate is nonbinding upon the public body, but the public body shall provide the estimate in good faith and strive to be reasonably accurate and to provide the public records in a manner based on this state's public policy under section 1 and the nature of the request in the particular instance."

On September 9<sup>th</sup>, this Office received your additional fee deposit. On November 4<sup>th</sup>, eight weeks from the date we received your additional deposit, we wrote to you that while your request was granted to the extent information is not exempt from public disclosure, processing times were extending beyond typically anticipated dates due to current alternate working arrangements necessitated by extraordinary community health concerns. We also advised that we expected to respond to you with records on or before December 4<sup>th</sup>. On December 4<sup>th</sup>, we wrote to you that we were continuing to process your request as expeditiously as possible; that for the same reasons stated in our November 4<sup>th</sup> letter, additional time was required; that we expected to respond to you with records on or before December 23<sup>rd</sup>; and that in consideration of the unavoidable inconvenience the delay was causing, a fee adjustment would be made. Accordingly, we write to you the following response.



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Records responsive to your request accompany this letter. Identifying information pertaining to certain individuals, personal email addresses, personal cellular telephone numbers, and certain other personal data have been redacted, and five (5) pages of personal information have been withheld pursuant to one or both of Sections 13(1)(a) and 13(2) of the MIFOIA. Section 13(1)(a) provides for the withholding of "Information of a personal nature if public disclosure of the information would constitute a clearly unwarranted invasion of an individual's privacy." Section 13(2) requires the withholding of information that, if released, would prevent the public body from complying with 20 U.S.C. 1232g, the Family Educational Rights and Privacy Act (FERPA). Nine (9) pages consisting of personal information pertaining to a student have been withheld under one or more of Sections 13(1)(a), (b)(iii), and 13(2). Section 13(1)(b) provides for the withholding of "Investigating records compiled for law enforcement purposes, but only to the extent that disclosure as a public record would do any of the following...(iii) Constitute an unwarranted invasion of personal privacy." University signatures, email addresses, netIDs, and a telephone number have been redacted under one or more of Sections 13(1)(u), (y), and (z), which allow for the withholding of information related to the ongoing security of a public body. Certain other information has been redacted under one or more of Sections 13(1)(g), (h), and (m). Sections 13(1)(g) and (h) provide for the withholding of information or records subject to the attorney-client privilege and attorney work-product doctrine, respectively. Section 13(1)(m) provides for the withholding of "Communications and notes within a public body or between public bodies of an advisory nature to the extent that they cover other than purely factual materials and are preliminary to a final agency determination of policy or action." Lastly, nine (9) pages have been withheld under Sections 13(1)(g) and/or (h).

The MIFOIA provides that when a public body denies all or a portion of a request, the requester may do one of the following: (1) submit an appeal of the determination to the head of the public body; or (2) commence a civil action in the court of claims to compel the public body's disclosure of the records. If you wish to seek judicial review of any denial, you must do so within 180 days of the date of this letter. If the court of claims orders disclosure of all or a portion of the public record(s) to which you have been denied access, you may receive attorneys' fees and, in certain circumstances, damages under the MIFOIA. Should you choose to file an appeal with the University regarding this response to your request, you must submit a written communication to this Office expressly stating that it is an "appeal" of this response. In your appeal, please state what records you believe should have been disclosed to you. You must also state the reasons you believe any denial of your MIFOIA request should be reversed. This Office will arrange for the processing and review of your appeal.

In processing your request, a significant amount of labor was required to search for, gather, and review the responsive records to separate information exempt from disclosure from that which is not exempt. Nevertheless, in consideration of the previously noted unavoidable delay in providing the attached records to you, fees for processing your request are hereby waived. Your fee deposit checks will be returned to you via U.S. first class mail. Pursuant to Section 4(4) of the MIFOIA, the University's procedures and guidelines for processing MIFOIA requests can be found at <http://foia.msu.edu>.

Attachments  
MSUF035320

# Exhibit G

**From:** Guerrant, Emily  
**Sent:** Thursday, June 18, 2020 2:43 PM  
**To:** Stanley, Samuel  
**Cc:** Zeig, Michael; Bales, Marri-Jo; Quinn, Brian  
**Subject:** [REDACTED]  
**Attachments:** 061720.DRAFT, [REDACTED].docx

Per your texts, I added a sentence to [REDACTED]



**Emily Gerkin Guerrant**  
Vice President and University Spokesperson

408 West Circle Dr., Room 401B | East Lansing, MI 48824  
Office: 517.355.3843 | Cell: [REDACTED]  
Email: [REDACTED]

**SPARTANS WILL.**

[REDACTED]

[REDACTED] 2020

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent: Tuesday, June 16, 2020 1:58 PM

To: [REDACTED]

Cc: [REDACTED]

Tuesday, June 16, 2020 1:58 PM

Samuel L. Stanley Jr., M.D., President, Office of the Provost,

MSU

Subject:

Re: Petition letter for keeping Dr. Stephen Hsu and supportive letters

Ok, I stand correct. I fill find a term the thread uses to characterize Steve's view.

From: [REDACTED]

Date: Tuesday, June 16, 2020 at 1:57 PM

To: [REDACTED]

Cc: [REDACTED]

Samuel L. Stanley Jr., M.D.,

President

Office of the Provost, MSU

Subject: Re: Petition letter for keeping Dr. Stephen Hsu and supportive letters

Apologies to everyone in the thread for the flood of  
message [REDACTED]

On Tue, Jun 16, 2020 at 1:49 PM [REDACTED] wrote:

I disagree. I believe it directly from the feed. If you can provide the entire feed in searchable form from the beginning we can resolve this issue.

From: [REDACTED]

Date: Tuesday, June 16, 2020 at 1:45 PM

To: [REDACTED]

Cc: [REDACTED]

Samuel L. Stanley Jr., M.D.,



President

"Office of the Provost, MSU"

Subject: Re: Petition letter for keeping Dr. Stephen Hsu and supportive letters

Hi

I am well aware of Urz and stated

On Tue, Jun 16, 2020 at 1:37 PM wrote:

Hi

If you look at my letter, it says

if you have a problem with it, take it up with them.

Best,

**From:** [REDACTED]

**Date:** Tuesday, June 16, 2020 at 1:20 PM

**To:** [REDACTED] Samuel L. Stanley Jr., M.D.,  
President "Office of the Provost, MSU"

**Cc:** [REDACTED]

**Subject:** Re: Petition letter for keeping Dr. Stephen Hsu and supportive letters

[REDACTED]

I did not see your message this morning and I apologize for missing it. The first line of your section on [REDACTED]

[REDACTED]

As for the paragraph you somehow view as exculpatory I will point out this sentence:

[REDACTED]

In other words, [REDACTED]

And, since you refuse to click over the [REDACTED] let me spoon feed you

[REDACTED]

[REDACTED]

[REDACTED]

We don't know because Hsu has been completely silent on the issue.

For everyone else on this thread, I realize you may be annoyed by the clutter in your inbox caused by this conversation. On the other hand, I don't see how you can close your eyes to this, as [REDACTED] obviously has.

[REDACTED]

From: [REDACTED]

Sent: Tuesday, June 16, 2020 1:05 PM

To: [REDACTED] Samuel L. Stanley Jr., M.D., President

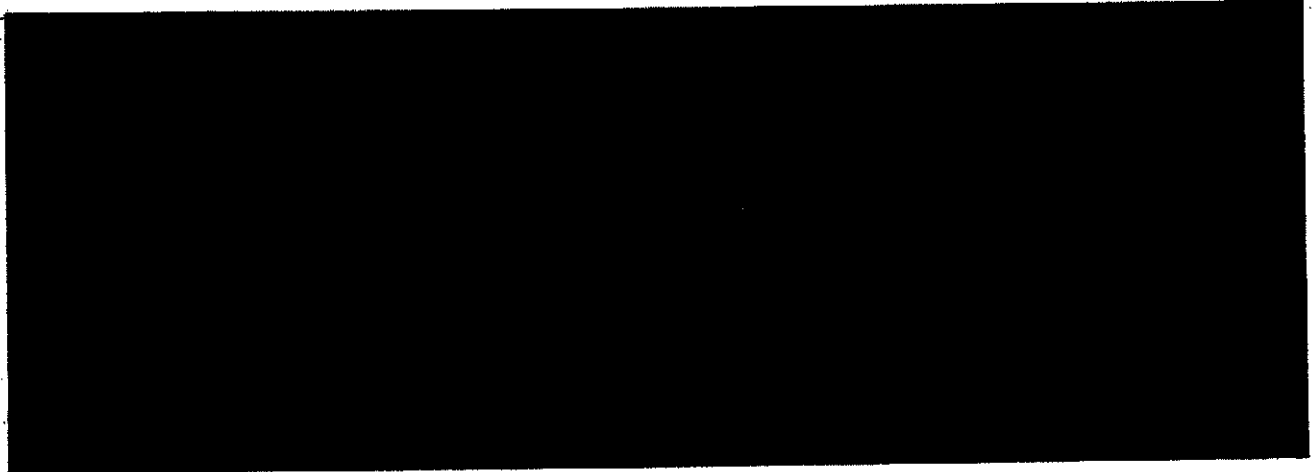
Office of the Provost, MSU

Cc: [REDACTED]

Subject: Re: Petition letter for keeping Dr. Stephen Hsu and supportive letters

Hi [REDACTED]

I wrote to you at 8:42 am this morning requesting a correction to your blog post. It is now 4 hours later and there has been no correction. In the meantime you have communicated about other issues. For the record, on your post you write:



My view statement characterizes the views of others. As I mentioned in second email to you this morning, the next sentences in my letter are logically inconsistent with my having any views on [REDACTED] position.

I hereby request again that you correct this immediately.

Best, [REDACTED]

**From:** [REDACTED]

**Date:** Tuesday, June 16, 2020 at 8:42 AM

**To:** [REDACTED] "Samuel L. Stanley Jr., M.D., President" [REDACTED]

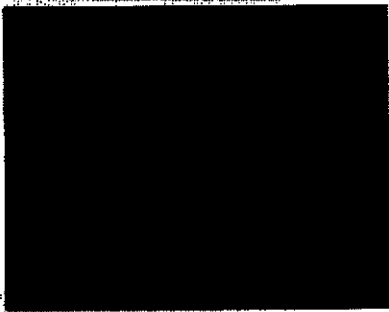
"Office of the Provost, MSU"

**Cc:** [REDACTED]

**Subject:** Re: Petition letter for keeping Dr. Stephen Hsu and supportive letters

I believe these letters misunderstand both the nature of the concerns about Dr. Hsu and what academic freedom entails.

<https://altrightorigins.com/2020/06/16/hsu-academic-freedom/>



[REDACTED]

**From:** [REDACTED]

**Sent:** Monday, June 15, 2020 12:55 PM

To: Samuel L. Stanley Jr., M.D., President

Office of the Provost, MSU

Cc:

Subject: Petition letter for keeping Dr. Stephen Hsu and supportive letters

Dear President Stanley and Interim Provost Sullivan:

Attached please find a petition to support Dr. Stephen Hsu, along with several supportive letters that you may have received from individual scholars.

Just a note, the petition was just launched approximately 12 hours ago. We will update you once the petition receives more letters and signatures.

Best Regards,

[Redacted]

[Redacted]



**From:**

Wilbur, Kathleen

**Sent:**

Friday, May 15, 2020 7:29 PM

**To:**

Stanley, Samuel

**Cc:**

Hsu, Stephen; Guerrant, Emily; Quinn, Brian

**Subject:**

[REDACTED]

[REDACTED]

Sent from my iPhone