

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

**ELECTRONIC PRIVACY
INFORMATION CENTER
1718 Connecticut Avenue, N.W.
Suite 200
Washington, D.C. 20009,**

Plaintiff,

v.

**INTERNAL REVENUE SERVICE
1111 Constitution Avenue, N.W.
Washington, D.C. 20224**

Defendant.

Civil Action No. 17-670

DECLARATION OF JOHN DAVISSON

I, John Louis Davisson, do hereby state and declare as follows

1. I am the Appellate Advocacy Fellow at the Electronic Privacy Information Center (“EPIC”).
2. On March 29, 2017, I submitted on behalf of EPIC a renewed FOIA request and appeal to the Internal Revenue Service (“IRS”).
3. In that request, EPIC sought “Donald J. Trump’s tax returns for tax years 2010 forward and any other indications of financial relations with the Russian government or Russian businesses.”
4. EPIC’s request also explained EPIC’s right to access the requested records under 26 U.S.C. § 6103(k)(3).

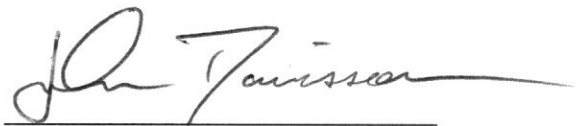
5. On April 4, 2017, I conducted a phone conference with IRS Disclosure Manager David Nimmo concerning EPIC's renewed FOIA request and appeal.

6. During the phone conference, Mr. Nimmo stated that the IRS was closing EPIC's request as incomplete.

7. Mr. Nimmo stated that "we're not going to do a (k)(3)" and that "we're not exercising (k)(3)."

8. Mr. Nimmo also stated that EPIC could "file a suit" and seek "judicial review."

9. I declare under penalty of perjury that the foregoing is true and correct. Executed on June 26, 2017 in Washington, DC.

A handwritten signature in black ink, appearing to read "John Louis Davisson", written over a horizontal line.

John Louis Davisson
EPIC Appellate Advocacy Fellow

Dated: June 26, 2017