UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

ELECTRONIC PRIVACY INFORMATION CENTER)))
Appellant))
V.) $Case$
UNITED STATES CUSTOMS AND BORDER PROTECTION,)
Appellee.)))

Case No. 17-5078

STATEMENT OF ISSUES

Pursuant to this Court's order of April 18, 2017, the Electronic

Privacy Information Center ("EPIC") submits the following Statement of

Issues:

- Whether the District Court erred in finding that Appellee's withholding of documents was lawful under exemption 7(E) of the Freedom of Information Act, 5 U.S.C. § 552.
- Whether the District Court erred in finding that Appellee had released all reasonably segregable, nonexempt records responsive to EPIC's Freedom of Information Act request.

Respectfully Submitted,

Dated: May 18, 2017

/s/ Alan Butler ALAN BUTLER MARC ROTENBERG JOHN DAVISSON Electronic Privacy Information Center 1718 Connecticut Ave. NW Suite 200 Washington, DC 20009 (202) 483-1140 butler@epic.org

CERTIFICATE OF SERVICE

I, Alan Butler, hereby certify that on May 18, 2017, I electronically filed the foregoing document with the Clerk of the Court for the United States Court of Appeals for the D.C. Circuit by using the CM/ECF system. The following participants in the case who are registered CM/ECF users will be served by the CM/ECF system:

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> /s/ Alan Butler ALAN BUTLER