

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

<hr/>)
ELECTRONIC PRIVACY INFORMATION CENTER)
1718 Connecticut Ave., N.W.)
Suite 200)
Washington, DC 20009)
)
Plaintiff,)
)
v.) Civil Action No. _____
)
THE UNITED STATES DEPARTMENT OF HOMELAND SECURITY)
Washington, D.C. 20528)
)
Defendant.)
<hr/>)

COMPLAINT FOR INJUNCTIVE RELIEF

1. This is an action under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552 (2011), for injunctive and other appropriate relief, seeking the release of agency records requested by the Electronic Privacy Information Center from the United States Department of Homeland Security.

Jurisdiction and Venue

2. This Court has subject matter jurisdiction over this action and personal jurisdiction over the parties pursuant to 5 U.S.C. § 552(a)(4)(B) (2011) and 5 U.S.C. § 552(a)(6)(C)(i) (2011). This Court also has jurisdiction over this action pursuant to 28 U.S.C. § 1331 (2011). Venue is proper in this district under 5 U.S.C. § 552(a)(4)(B) (2011).

Parties

3. Plaintiff the Electronic Privacy Information Center (“EPIC”) is a public interest

research organization incorporated as a not-for-profit corporation in Washington, D.C. EPIC's activities include the review of federal activities and policies to determine their impacts on civil liberties and privacy interests. Among its other activities, EPIC publishes books, reports, and a bi-weekly electronic newsletter. EPIC also maintains two very popular Internet sites, epic.org and privacy.org, by means of which EPIC publishes information regarding new threats to privacy, including information EPIC has obtained from federal agencies under the FOIA.

4. Defendant United States Department of Homeland Security ("DHS") is an agency established in the Executive Branch of the United States Government. DHS is an agency within the meaning of 5 U.S.C. § 552(f)(1) (2011).

Facts

DHS has been Working with Third Party Venders to Develop Social Networking Surveillance Programs

5. In February 2011, DHS publicly announced that the agency planned to implement "Publicly Available Social Media Monitoring and Situational Awareness Initiatives."

6. The initiatives were designed to gather information from "online forums, blogs, public websites, and message boards," to store and analyze the information gathered, and then to "disseminate relevant and appropriate de-identified information to federal, state, local, and foreign governments and private sector partners."

7. Previously, DHS had developed surveillance initiatives of public chats and other online forums concerning specific events, such as the January 2010 earthquake in Haiti, the 2010 Winter Olympics, and the April 2010 BP oil spill.

8. In June of 2010, however, DHS signaled its intention to pursue ongoing monitoring of social media services, and published a description of the program on February 1, 2011 in the Federal Register.

9. As set out in the Federal Register and Privacy Impact Assessments, the DHS's social media monitoring initiative would allow the agency to "establish [fictitious] usernames and passwords," to create covert social media profiles to spy on other users, deploy search tools, and record the online activity of particular users, based on the presence of such search terms, as "illegal immigrants," "drill," "infection," "strain," "outbreak," "virus," "recovery," "deaths," "collapse," "human to animal," and "Trojan."

10. DHS proposes to store the information that it obtains from the users of online services for up to five years to make it available across the government, to local, state, and federal agencies, as well as to organizations outside of the United States.

11. The proposed social media monitoring initiative is designed to gather personally identifiable information ("PII"), including full names, affiliations, positions or titles, and account usernames.

12. The agency plans to collect PII "when it lends credibility to the report or facilitates coordination with federal, state, local, tribal, territorial, foreign, or international government partners."

13. Social media users routinely provide sensitive and personal information in their online communications.

14. Social media users have no reason to believe that the Department of Homeland Security is tracking their every post.

15. The agency anticipates retrieving users information in the normal course of performing social media searches.

16. DHS states that it will redact PII before "dissemination," presumably to other agencies as well as state, local, tribal, and foreign governments, and authorized private sector

entities.

17. The agency plans regularly to relay the records it produces through this program to “federal, state, local, tribal, territorial, foreign, or international government partners.”

18. The DHS Chief Privacy Officer has stated that the records will be shared both by “email and telephone” to contacts inside and outside of the agency.

19. The CPO further stated that “[n]o procedures are in place” to determine which users may access this system of records; even Department contractors have full access to the system.

EPIC Submitted a FOIA Request to DHS Regarding the Agency’s Social Media Monitoring Program

20. On April 12, 2011, pursuant to the Freedom of Information Act, EPIC requested agency records concerning the agency’s social media monitoring initiatives. Specifically, EPIC asked the DHS to disclose:

1. all contracts, proposals, and communications between the federal government and third parties, including, but not limited to, H.B. Gar Federal, Palantir Technologies, and/or Berico Technologies, and/or parent or subsidiary companies, that include provisions concerning the capability of social media monitoring technology to capture, store, aggregate, analyze, and/or match personally-identifiable information;
2. all contracts, proposals, and communications between DHS and any states, localities, tribes, territories, and foreign governments, and/or their agencies or subsidiaries, and/or any corporate entities, including but not limited to H.B. Gary Federal, Palantir Technologies, and/or Berico Technologies, regarding the implementation of any social media monitoring initiative;
3. all documents used by DHS for internal training of staff and personnel regarding social media monitoring, including any correspondence and communications between DHS, internal staff and personnel, and/or privacy officers, regarding the receipt, use, and/or implementation of training and evaluation of documents;
4. all documents detailing the technical specifications of social media monitoring software and analytic tools, including any security measures to protect records of collected information and analysis; and

5. all documents concerning data breaches of records generated by social media monitoring technology.

21. EPIC also asked DHS to expedite its response to EPIC's FOIA Request on the basis that it pertains to a matter about which there is an urgency to inform the public about an actual or alleged federal government activity, and was made by a person primarily engaged in disseminating information. EPIC made this request pursuant to 5 U.S.C. § 552(a)(6)(E) (2011). EPIC based the request on the public's and press's interest in social media monitoring generally and the agency's social media monitoring activities specifically.

22. EPIC also requested "News Media" fee status under the Freedom of Information Act, based on its established status as a representative of the news media.

DHS Failed to Make a Determination Regarding EPIC's FOIA Request and Failed to Produce Any Documents

23. On April 28, 2011, DHS emailed a letter to EPIC, acknowledging the agency's receipt of EPIC's FOIA Request on April 19, 2011, and assigning the request reference number DHS/OS/PRIV 11-0736.

24. DHS's letter held EPIC's request for a fee waiver in abeyance pending the review of responsive records.

25. DHS denied EPIC's request for expedited processing and for "news media" fee status.

26. DHS referred EPIC's request to several DHS components for processing and further response.

27. To date, either the DHS nor any of its components have produced any documents in response to EPIC's FOIA Request.

EPIC Filed an Administrative Appeal with DHS

28. On May 18, 2011 EPIC appealed the DHS's April 28, 2011 response to EPIC's April 12, 2011 FOIA request.

29. EPIC appealed the DHS's denial of EPIC's request for "news media" fee status, and renewed its request for a fee waiver and expedited processing for the appeal.

30. EPIC's May 18, 2011 appeal was sent to DHS via certified mail and was received by the agency on May 23, 2011.

DHS Failed to Respond to EPIC's Administrative Appeal and Failed to Produce Any Documents

31. Through the date of this pleading, which is filed more than twenty working days after DHS received EPIC's Administrative Appeal, DHS has neither made a determination regarding EPIC's FOIA Request, nor responded to EPIC's Administrative Appeal.

32. Through the date of this pleading, DHS has failed to produce any documents in response to EPIC's FOIA Request.

33. Through the date of this pleading, DHS has failed to state which documents, if any, it intends to produce in response to EPIC's FOIA Request and EPIC's Administrative Appeal.

Count I

Violation of the FOIA: Failure to Comply With Statutory Deadlines

34. Paragraphs 1-33 above are hereby incorporated by reference as if set forth fully herein.

35. DHS' failure to make a determination concerning EPIC's FOIA Request violates the statutory deadlines imposed by the FOIA, including the deadlines set forth in 5 U.S.C. § 552(a)(6)(A) (2011).

36. EPIC has exhausted the applicable administrative remedies with respect to EPIC's FOIA Request. 5 U.S.C. § 552(a)(6)(C)(i) (2011).

37. DHS has wrongly withheld responsive agency records from EPIC.

38. EPIC is entitled to injunctive relief compelling the release and disclosure of the requested agency records.

Count II

Violation of the FOIA: Failure to Grant "News Media" Fee Status

39. Paragraphs 1-38 above are hereby incorporated by reference as if set forth fully herein.

40. DHS unlawfully denied EPIC's request for "news media" fee status.

41. EPIC is a non-profit, educational organization that routinely and systematically disseminates information to the public.

42. EPIC is a "representative of the news media" for fee waiver purposes.

43. EPIC has exhausted the applicable administrative remedies with respect to EPIC's request for "news media" fee status.

44. EPIC is entitled to injunctive relief compelling DHS to grant EPIC news media fee status concerning EPIC's FOIA Request.

Count III

Violation of the FOIA: Failure to Grant Fee Waiver

45. Paragraphs 1-44 above are hereby incorporated by reference as if set forth fully herein.

46. DHS unlawfully denied EPIC's request for a fee waiver.

47. Disclosure of the information sought by EPIC's FOIA Request will contribute significantly to public understanding of the operations or activities of the government.

48. Disclosure of the information sought by EPIC's FOIA Request is not primarily in EPIC's commercial interest.

49. EPIC has exhausted the applicable administrative remedies with respect to EPIC's request for a fee waiver.

50. EPIC is entitled to injunctive relief compelling DHS to grant EPIC's request for a fee waiver concerning EPIC's FOIA Request.

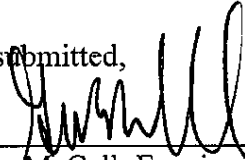
Requested Relief

WHEREFORE, plaintiff prays that this Court:

- A. order defendant to make a complete determination regarding EPIC's FOIA Request within five working days of the date of the Court's Order in this matter;
- B. order defendant to produce all responsive agency records within ten business days of the Court's Order in this matter;
- C. order defendant to grant EPIC's request for news media status;
- D. order defendant to grant EPIC's request for a fee waiver;
- E. award plaintiff its costs and reasonable attorneys' fees incurred in this action pursuant to 5 U.S.C. § 552(a)(4)(E) (2011); and
- F. grant such other relief as the Court may deem just and proper.

Respectfully submitted,

By:



Ginger McCall, Esquire (DC Bar # 1001104)
Marc Rotenberg, Esquire (DC Bar # 422825)
John Verdi, Esquire (DC Bar # 495764)
ELECTRONIC PRIVACY INFORMATION
CENTER
1718 Connecticut Avenue, N.W.
Suite 200
Washington, D.C. 20009
(202) 483-1140 (telephone)
(202) 483-1248 (facsimile)

Dated: December 20, 2011

JS-44
 (Rev. 2/11 DC)

11-2261 JDB

<p>I (a) PLAINTIFFS</p> <p>Electronic Privacy Information Center</p> <hr/> <p>(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF <u>11001</u> (EXCEPT IN U.S. PLAINTIFF CASES)</p> <p>(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)</p> <p>Ginger McCall, Esquire Marc Rotenberg, Esquire 1718 Connecticut Ave NW Suite 200 Washington, DC 20009 (202) 483-1140</p>	<p>DEFENDANTS</p> <p>United States Department of Homeland Security</p> <hr/> <p>COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT _____ (IN U.S. PLAINTIFF CASES ONLY)</p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.</p>																								
<p>II. BASIS OF JURISDICTION (PLACE AN X IN ONE BOX ONLY)</p> <p><input type="radio"/> 1 U.S. Government Plaintiff</p> <p><input checked="" type="radio"/> 2 U.S. Government Defendant</p> <p><input type="radio"/> 3 Federal Question (U.S. Government Not a Party)</p> <p><input type="radio"/> 4 Diversity (Indicate Citizenship of Parties in item III)</p>	<p>III CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN X IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT) FOR DIVERSITY CASES ONLY!</p> <table style="width:100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>PTF</th> <th>DFT</th> <th></th> <th>PTF</th> <th>DFT</th> </tr> </thead> <tbody> <tr> <td>Citizen of this State</td> <td><input type="radio"/> 1</td> <td><input type="radio"/> 1</td> <td>Incorporated or Principal Place of Business in This State</td> <td><input type="radio"/> 4</td> <td><input type="radio"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="radio"/> 2</td> <td><input type="radio"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td><input type="radio"/> 5</td> <td><input type="radio"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="radio"/> 3</td> <td><input type="radio"/> 3</td> <td>Foreign Nation</td> <td><input type="radio"/> 6</td> <td><input type="radio"/> 6</td> </tr> </tbody> </table>		PTF	DFT		PTF	DFT	Citizen of this State	<input type="radio"/> 1	<input type="radio"/> 1	Incorporated or Principal Place of Business in This State	<input type="radio"/> 4	<input type="radio"/> 4	Citizen of Another State	<input type="radio"/> 2	<input type="radio"/> 2	Incorporated and Principal Place of Business in Another State	<input type="radio"/> 5	<input type="radio"/> 5	Citizen or Subject of a Foreign Country	<input type="radio"/> 3	<input type="radio"/> 3	Foreign Nation	<input type="radio"/> 6	<input type="radio"/> 6
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Citizen or Subject of a Foreign Country	<input type="radio"/> 3	<input type="radio"/> 3	Foreign Nation	<input type="radio"/> 6	<input type="radio"/> 6																				

Case: 1:11-cv-02261
 Assigned To : Bates, John D.
 Assign. Date : 12/20/2011
 Description: FOIA/Privacy Act

IV. CASE ASSIGNMENT AND NATURE OF SUIT

(Place a X in one category, A-N, that best represents your cause of action and one in a corresponding Nature of Suit)

<p><input type="radio"/> A. Antitrust</p> <p><input type="checkbox"/> 410 Antitrust</p>	<p><input type="radio"/> B. Personal Injury/Malpractice</p> <p><input type="checkbox"/> 310 Airplane</p> <p><input type="checkbox"/> 315 Airplane Product Liability</p> <p><input type="checkbox"/> 320 Assault, Libel & Slander</p> <p><input type="checkbox"/> 330 Federal Employers Liability</p> <p><input type="checkbox"/> 340 Marine</p> <p><input type="checkbox"/> 345 Marine Product Liability</p> <p><input type="checkbox"/> 350 Motor Vehicle</p> <p><input type="checkbox"/> 355 Motor Vehicle Product Liability</p> <p><input type="checkbox"/> 360 Other Personal Injury</p> <p><input type="checkbox"/> 362 Medical Malpractice</p> <p><input type="checkbox"/> 365 Product Liability</p> <p><input type="checkbox"/> 368 Asbestos Product Liability</p>	<p><input type="radio"/> C. Administrative Agency Review</p> <p><input type="checkbox"/> 151 Medicare Act</p> <p>Social Security:</p> <p><input type="checkbox"/> 861 HIA ((1395ff))</p> <p><input type="checkbox"/> 862 Black Lung (923)</p> <p><input type="checkbox"/> 863 DIWC/DIWW (405(g))</p> <p><input type="checkbox"/> 864 SSID Title XVI</p> <p><input type="checkbox"/> 865 RSI (405(g))</p> <p>Other Statutes</p> <p><input type="checkbox"/> 891 Agricultural Acts</p> <p><input type="checkbox"/> 892 Economic Stabilization Act</p> <p><input type="checkbox"/> 893 Environmental Matters</p> <p><input type="checkbox"/> 894 Energy Allocation Act</p> <p><input type="checkbox"/> 890 Other Statutory Actions (If Administrative Agency is Involved)</p>	<p><input type="radio"/> D. Temporary Restraining Order/Preliminary Injunction</p> <p>Any nature of suit from any category may be selected for this category of case assignment.</p> <p>*(If Antitrust, then A governs)*</p>
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E. General Civil (Other) **OR** **F. Pro Se General Civil**

<p>Real Property</p> <p><input type="checkbox"/> 210 Land Condemnation</p> <p><input type="checkbox"/> 220 Foreclosure</p> <p><input type="checkbox"/> 230 Rent, Lease & Ejectment</p> <p><input type="checkbox"/> 240 Torts to Land</p> <p><input type="checkbox"/> 245 Tort Product Liability</p> <p><input type="checkbox"/> 290 All Other Real Property</p> <p>Personal Property</p> <p><input type="checkbox"/> 370 Other Fraud</p> <p><input type="checkbox"/> 371 Truth in Lending</p> <p><input type="checkbox"/> 380 Other Personal Property Damage</p> <p><input type="checkbox"/> 385 Property Damage Product Liability</p>	<p>Bankruptcy</p> <p><input type="checkbox"/> 422 Appeal 28 USC 158</p> <p><input type="checkbox"/> 423 Withdrawal 28 USC 157</p> <p>Prisoner Petitions</p> <p><input type="checkbox"/> 535 Death Penalty</p> <p><input type="checkbox"/> 540 Mandamus & Other</p> <p><input type="checkbox"/> 550 Civil Rights</p> <p><input type="checkbox"/> 555 Prison Condition</p> <p>Property Rights</p> <p><input type="checkbox"/> 820 Copyrights</p> <p><input type="checkbox"/> 830 Patent</p> <p><input type="checkbox"/> 840 Trademark</p> <p>Federal Tax Suits</p> <p><input type="checkbox"/> 870 Taxes (US plaintiff or defendant)</p> <p><input type="checkbox"/> 871 IRS-Third Party 26 USC 7609</p>	<p>Forfeiture/Penalty</p> <p><input type="checkbox"/> 610 Agriculture</p> <p><input type="checkbox"/> 620 Other Food & Drug</p> <p><input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881</p> <p><input type="checkbox"/> 630 Liquor Laws</p> <p><input type="checkbox"/> 640 RR & Truck</p> <p><input type="checkbox"/> 650 Airline Regs</p> <p><input type="checkbox"/> 660 Occupational Safety/Health</p> <p><input type="checkbox"/> 690 Other</p> <p>Other Statutes</p> <p><input type="checkbox"/> 400 State Reapportionment</p> <p><input type="checkbox"/> 430 Banks & Banking</p> <p><input type="checkbox"/> 450 Commerce/ICC Rates/etc.</p> <p><input type="checkbox"/> 460 Deportation</p>	<p><input type="checkbox"/> 462 Naturalization Application</p> <p><input type="checkbox"/> 465 Other Immigration Actions</p> <p><input type="checkbox"/> 470 Racketeer Influenced & Corrupt Organizations</p> <p><input type="checkbox"/> 480 Consumer Credit</p> <p><input type="checkbox"/> 490 Cable/Satellite TV</p> <p><input type="checkbox"/> 810 Selective Service</p> <p><input type="checkbox"/> 850 Securities/Commodities/Exchange</p> <p><input type="checkbox"/> 875 Customer Challenge 12 USC 3410</p> <p><input type="checkbox"/> 900 Appeal of fee determination under equal access to Justice</p> <p><input type="checkbox"/> 950 Constitutionality of State Statutes</p> <p><input type="checkbox"/> 890 Other Statutory Actions (if not administrative agency review or Privacy Act)</p>
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<input type="radio"/> G. Habeas Corpus/ 2255 <input type="checkbox"/> 530 Habeas Corpus-General <input type="checkbox"/> 510 Motion/Vacate Sentence <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee	<input type="radio"/> H. Employment Discrimination <input type="checkbox"/> 442 Civil Rights-Employment (criteria: race, gender/sex, national origin, discrimination, disability age, religion, retaliation) *(If pro se, select this deck)*	<input checked="" type="radio"/> I. FOIA/PRIVACY ACT <input checked="" type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 890 Other Statutory Actions (if Privacy Act) *(If pro se, select this deck)*	<input type="radio"/> J. Student Loan <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (excluding veterans)
<input type="radio"/> K. Labor/ERISA (non-employment) <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Labor Railway Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="radio"/> L. Other Civil Rights (non-employment) <input type="checkbox"/> 441 Voting (if not Voting Rights Act) <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 445 American w/Disabilities-Employment <input type="checkbox"/> 446 Americans w/Disabilities-Other	<input type="radio"/> M. Contract <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholder's Suits <input type="checkbox"/> 190 Other Contracts <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<input type="radio"/> N. Three-Judge Court <input type="checkbox"/> 441 Civil Rights-Voting (if Voting Rights Act)

V. ORIGIN

1 Original Proceeding
 2 Removed from State Court
 3 Remanded from Appellate Court
 4 Reinstated or Reopened
 5 Transferred from another district (specify)
 6 Multi district Litigation
 7 Appeal to District Judge from Mag. Judge

VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE.)
 5 U.S.C. § 552 (2011) - Freedom of Information Act Request for Injunctive Relief

VII. REQUESTED IN COMPLAINT CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 **DEMAND \$** _____ **JURY DEMAND:** YES NO Check YES only if demanded in complaint

VIII. RELATED CASE(S) IF ANY (See instruction) YES NO If yes, please complete related case form

DATE 12/20/11 SIGNATURE OF ATTORNEY OF RECORD

INSTRUCTIONS FOR COMPLETING CIVIL COVER SHEET JS-44
 Authority for Civil Cover Sheet

The JS-44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. Listed below are tips for completing the civil cover sheet. These tips coincide with the Roman Numerals on the Cover Sheet.

- I. COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF/DEFENDANT (b) County of residence. Use 11001 to indicate plaintiff is resident of Washington, D.C., 88888 if plaintiff is resident of the United States but not of Washington, D.C., and 99999 if plaintiff is outside the United States.
- III. CITIZENSHIP OF PRINCIPAL PARTIES. This section is completed only if diversity of citizenship was selected as the Basis of Jurisdiction under Section II.
- IV. CASE ASSIGNMENT AND NATURE OF SUIT. The assignment of a judge to your case will depend on the category you select that best represents the primary cause of action found in your complaint. You may select only one category. You must also select one corresponding nature of suit found under the category of case.
- VI. CAUSE OF ACTION. Cite the US Civil Statute under which you are filing and write a brief statement of the primary cause.
- VIII. RELATED CASES, IF ANY. If you indicated that there is a related case, you must complete a related case form, which may be obtained from the Clerk's Office.

Because of the need for accurate and complete information, you should ensure the accuracy of the information provided prior to signing the form.

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