

United States District Court
for the District of Columbia

DR. ORLY TAITZ, ESQ, PRO SE)
)
Plaintiff,)
v.)
)
PATRICK DONAHOE,)
Postmaster General, et al.)
)
Defendants.)

Civil Action No.: 13-1020
Judge Lamberth

DECLARATION OF JANE G. EYRE

I, Jane G. Eyre, Manager, Records Office, for the United States Postal Service ["USPS"], do hereby declare as follows:

1. I am employed by the United States Postal Service in Washington, DC. I have been the Manager, Records Office, since May 2004.
2. As part of my duties and responsibilities, I act as a Freedom of Information (FOIA) Officer for USPS. As such, I am familiar with USPS's records and systems that contain records. My current responsibilities include managing the Records Office and interfacing with the Privacy Office in strategic direction and integration. I also oversee, coordinate, and conduct activities associated with the administration of the Freedom of Information Act ("FOIA") and the Privacy Act of 1974 ("PA"). (5 U.S.C § 552 and 5 U.S.C § 552a) I am responsible for establishing procedures and guidelines to ensure that record management practices comply with the FOIA and the PA. As such, I am responsible for, among other things, coordinating and responding to requests for access to Postal Service documents made pursuant to the FOIA.
3. I am providing this declaration for use in the above-captioned litigation. I understand that Plaintiff in the litigation asserts that she submitted a FOIA request to the USPS on May 30, 2013.
4. At the time that Plaintiff asserts that she submitted a FOIA request to the USPS, USPS had four program offices: USPS FOIA Program, USPS General Counsel (appeals for USPS and Postal Inspection Service), USPS OIG FOIA Program (initial requests and appeals) and Postal Inspection Service Program. The USPS, Postal Inspection Service and OIG offices serve as FOIA Requester Service Centers. RSCs are responsible for facilitating communication between USPS and FOIA requesters, providing information to requesters concerning the status of FOIA requests and information about responses to such requests, and tracking and reporting on FOIA activity. Subsequent to the date that Plaintiff asserts that she submitted a FOIA request to USPS, on August 2, 2013, USPS established of a fourth "Field" RSC in St. Louis, Missouri to specifically support the tracking and processing of FOIA requests for records maintained at area offices, district offices, or other field operations facilities.
5. USPS regulations contained in Handbook AS353, *Guide to Privacy, the Freedom of Information Act and Records Management*, Section 4-2.4, provide that "Requesters should direct FOIA requests to the appropriate FOIA Requester Service Center (RSC) as follows:

- a. *U.S. Postal Service Records and Employee Listings.* FOIA requests for U.S. Postal Service records and employee listings must be directed to:
MANAGER RECORDS OFFICE
US POSTAL SERVICE
475 L'ENFANT PLZ SW RM 5821
WASHINGTON DC 20260
Fax: 202-268-5353
- b. *Inspection Service Records.* FOIA requests for Inspection Service records must be directed to:
OFFICE OF COUNSEL
US POSTAL INSPECTION SERVICE
1735 N LYNN ST 4TH FL
ARLINGTON VA 22209
Fax: 703-292-4083
- c. *Inspector General Records.* FOIA requests for Inspector General records must be directed to:
OFFICE OF INSPECTOR GENERAL
US POSTAL SERVICE
1735 N LYNN ST STE 10000
ARLINGTON VA 22209
Fax: 703-248-4626
e-mail: foia@uspsaig.gov

The USPS also posts information on where to direct FOIA requests online at <http://about.usps.com/who-we-are/foia/service-centers.htm>.

6. All FOIA program offices utilize, independently, the USPS FOIA/PA Tracking System, a comprehensive, Web-based application, to track and report on FOIA requests received. The staff of the Records Office is responsible for entering each request received by USPS into the FOIA/PA Tracking System for tracking and reporting purposes, and referring the request to the appropriate records custodian for processing and response. The FOIA/PA Tracking System keeps an electronic record of all FOIA requests received in the Records Office and assigns to each request a tracking number.
7. On November 25, 2013, I conducted a search of the FOIA Tracking System for FOIA requests received from Orly Taitz and Defend Our Freedoms Foundation. This search disclosed no record that the USPS received a FOIA request from either during FY 2013. This search did, however, disclose that one request was received by the OIG from Orly Taitz with a requested date of May 31, 2013. This search also disclosed that the OIG received one FOIA appeal from Orly Taitz with a requested date of July 4, 2013. OIG is responsible for maintaining and storing its own records and for assuring compliance with applicable records management, retention, and disclosure requirements (39 Code of Federal Regulations, 230.5).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on November 27, 2013 in Washington, DC.


Jane G. Eyre
Manager, Records Office