UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JASON LEOPOLD, PLAINTIFF vs. DEPARTMENT OF JUSTICE, DEFENDANT	)	Civil Action No. 1:15-cv-2117 (RDM)

MEMORANDUM OF POINTS AND AUTHORITIES IN OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

Plaintiff respectfully submits this Memorandum of Points and Authorities in opposition to Defendant's Motion for Summary Judgment and requests that the Court deny Defendant's motion. The FBI has not demonstrated that the withheld material is exempt in its entirety under Exemption 7(A) and has not conducted an adequate search for responsive records.

I. The FBI has not met the Exemption 7 threshold

"[T]here are two critical conditions that must be met for a law enforcement agency to pass the Exemption 7 threshold." *Pratt v. Webster*, 673 F.2d 408, 420 (D.C. Cir. 1982). First, the agency must meet the *Pratt* "rational nexus" test, which requires that "investigatory activities that give rise to the documents sought [ ] be related to the enforcement of federal laws or to the maintenance of national security." *Id.* To show such a nexus, "the agency should be able to identify a particular individual or a particular incident as the object of its investigation and the connection between that individual or incident and a possible security risk or violation of federal law." *Id.* at 420. Thus, "a court may not grant summary judgment for the agency" if its

"declarations fail to supply facts in sufficient detail to apply the *Pratt* rational nexus test[.]" *Campbell v. United States DOJ*, 164 F.3d 20, 32 (D.C. Cir. 1998).

"Second, the nexus between the investigation and one of the agency's law enforcement duties must be based on information sufficient to support at least 'a colorable claim' of its rationality." *Pratt*, 673 F.2d at 421. While it is not "necessary for the investigation to lead to a criminal prosecution or other enforcement proceeding in order to satisfy the 'law enforcement purpose' criterion," the "agency's basis for the claimed connection between the object of the investigation and the asserted law enforcement duty cannot be pretextual or wholly unbelievable." *Id.* Thus, while courts are to be "deferential" in measuring an agency's claim of a "law enforcement purpose," their review "is not vacuous." *Id.* at 421.

As to the first prong, the rational nexus test, the FBI has not cited, at least in its public filings, to any "statutes whose violation could reasonably have been thought evidenced by" Ms. Clinton's use of a private email server. *Shaw v. FBI*, 749 F.2d 58, 63 (D.C. Cir. 1984). The public declaration of David Hardy cites only to the general laws giving the FBI authority to investigate violation of federal law not exclusively assigned to another agency. (Hardy Decl. ¶ 14.) However, "[a]t no point does Mr. Hardy supply specific facts as to the basis for FBI's belief" that Ms. Clinton (or anyone else) committed a crime. *Shapiro v. United States DOJ*, 37 F. Supp. 3d 7, 29 (D.D.C. 2014). The only fact mentioned in the public Hardy declaration is FBI Director Comey's statement to the House Judiciary Committee "that the FBI received and 'is working on a referral [from] Inspectors General in connection with former Secretary Clinton's use of a private e-mail server." (Hardy Decl. ¶ 15.) The Intelligence Community IG referral cited in Mr. Hardy's declaration was *not* a criminal referral, however, according to a statement released by the Intelligence Community IG. (Ex. 1.) That is not to say that the security referral

did not turn into a criminal investigation or that the FBI cannot demonstrate that its investigation relates to the violation of federal law or the maintenance of national security. But when recently asked point-blank by a reporter whether the investigation was a "criminal investigation," Director Comey declined to describe the investigation as criminal in nature: "We're conducting an investigation. That's the bureau's business. That's what we do. That's probably all I can say about it."[1] On the present record, the FBI has "simply fail[ed] to supply facts in sufficient detail to apply the *Pratt* rational nexus test," *Campbell*, 164 F.3d at 132, at least in its public filings.

Given that the FBI has submitted an additional declaration *ex parte, in camera*, Plaintiff has no way of knowing whether that filing establishes that Ms. Clinton or her aides are the object of an ongoing investigation of a possible violation of federal law. *Cf. King v. United States Dep't of Justice*, 586 F. Supp. 286, 293 (D.D.C. 1983) ("It has clearly established that a particular individual, Carol King, was the object of an investigation because of possible violations of federal law.") Plaintiff is thus left in the situation of trying to rebut arguments he cannot see. Nevertheless, Plaintiff will at least attempt to take a swing at the piñata.

A persuasive case can be made that Ms. Clinton was in violation of non-criminal federal regulations regarding preservation of federal records, as one legal commentator has explained.[2] The 2009 National Archives Regulations (Section 1236.22), the Federal Records Act, and State

[1] FBI National Press Office, "Director Comey Remarks During May 11 'Pen and Pad' Briefing with Reporters" (May 14, 2016), available at https://www.fbi.gov/news/pressrel/press-releases/director-comey-remarks-during-may-11-pen-and-pad-with-reporters (last accessed May 16, 2016).

[2] "Trump is Wrong, Hillary Clinton Shouldn't Be Charged Based on What We Know Now," D. Abrams, LawNewz.com (Jan. 29, 2016), available at http://lawnewz.com/high-profile/no-hillary-did-not-commit-a-crime-at-least-based-on-what-we-know-today/2/ (last accessed May 15, 2016). See also Pushback on Hillary emails falls short, D. Byers, Politico (Mar. 3, 2015), available at http://www.politico.com/blogs/media/2015/03/pushback-on-hillary-emails-falls-short-203418 (last accessed May 15, 2016).

Department internal policies may have prohibited, at the relevant times, the use of a personal email address for official business and/or the failure to properly preserve emails sent or received from a personal email address. Ms. Clinton may even have been attempting to shield her emails from the reach of FOIA. If the *ex parte, in camera* declaration cites to no more than such violations of non-criminal laws and regulations, it would not meet the *Pratt* rational nexus test, which requires a showing of a connection to a possible crime. *Shapiro*, 37 F. Supp. 3d at 29.

The declaration may also cite to Ms. Clinton or her aides being the subject or target of an investigation into the mishandling of classified information, a violation of 18 U.S.C. § 1924. If that is the federal crime cited in the declaration, however, there still must be a "colorable claim" that the use of a private email server involves the knowing removal of documents or materials without authority and with the intent to retain such documents or materials at an unauthorized location. 18 U.S.C. § 1924.[3] In light of Director Comey's statement that the FBI is merely "working on a referral [from] Inspectors General" – a referral that the Inspectors General explicitly described as non-criminal in nature[4] – Plaintiff has met his burden of showing "persuasive evidence that in fact another, nonqualifying reason prompted the investigation," thus precluding summary judgment for the agency. *Shaw*, 759 F.2d at 63.

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[3] An analysis of this law by a group supportive of Ms. Clinton can be found at http://mediamatters.org/research/2015/08/04/conservative-medias-fact-challenged-comparison/204751

[4] Although the referral by the IGs was made "for counterintelligence purposes" (Ex. 1) and it has been reported that FBI counterintelligence agents are conducting the investigation, the FBI has not cited its counterintelligence mission as a qualifying reason for the investigation. See "Justice Dept. grants immunity to staffer who set up Clinton email server," A. Goldman, *The Washington Post* (Mar. 2, 2016), available at https://www.washingtonpost.com/world/national-security/in-clinton-email-investigation-justice-department-grants-immunity-to-former-state-department-staffer/2016/03/02/e421e39e-e0a0-11e5-9c36-e1902f6b6571_story.html (last accessed May 15, 2016.) Plaintiff will therefore not respond to this potential argument which was not made. However, Plaintiff notes that it is not obvious how the disclosure of the contents of Ms. Clinton's emails would categorically compromise any counterintelligence operation.

II. The release of the requested records is not reasonably likely to interfere with law enforcement proceedings.

To meet its burden of demonstrating that release of the requested records would be reasonably likely to interfere with law enforcement proceedings, the FBI attempts to make a generic showing of harm by grouping the documents into categories. To successfully rely on a generic showing of harm, "the FBI has a three-fold task. First, it must define its categories functionally. Second, it must conduct a document-by-document review in order to assign documents to the proper category. Finally, it must explain to the court how the release of each category would interfere with enforcement proceedings." *Bevis v. Dep't of State*, 801 F.2d 1386, 1389-90 (D.C. Cir. 1986).

The FBI has not met the three-part test. First, the category it defines – "Investigative and Evidentiary Material" (Hardy Decl. ¶ 19) – is so broad as to encompass any and all information obtained during an investigation. Exemption 7(A), however, is not so sweeping, and requires a more particularized showing of harm. *Campbell*, 682 F.2d at 259("Congress, we conclude, based on the words it employed and the relevant legislative history, did not authorize blanket exemption for such records [under Exemption 7(A)]."") Here, the FBI defines the category of Investigative and Evidentiary Material to include "evidence, potential evidence, or information that has not yet been assessed for evidentiary value[.]" (Hardy Decl. ¶ 20.) It is difficult to conceive of any information collected in the course of an ongoing investigation that would not be at least "potential evidence." Further, to include as "evidence" any "information that has not yet been assessed for evidentiary value" would drain the term "evidence" of any meaning.

As to the second prong, the FBI has not averred that it conducted a document-by-document review of Ms. Clinton's emails and determined whether each one is evidence or not. To the contrary, the FBI's inclusion of "information that has not yet been assessed for evidentiary value" suggests that at least some emails have not been reviewed yet.

Finally, given the acknowledgment by the FBI in this case that there are in fact documents responsive to the first item of Plaintiff's request (i.e., the FBI did not assert a Glomar response), the FBI has not sufficiently established the harm that would result from disclosure of the *contents* of the emails. A typical assertion of Exemption 7(A) "involve[s] FOIA requests by actual or potential targets of concrete, prospective enforcement proceedings for materials compiled by the investigative agency or derived from third parties and to which the requester otherwise had no access." *Citizens for Responsibility & Ethics in Wash. v. United States DOJ*, 746 F.3d 1082, 1099 (D.C. Cir. 2014). As the FBI points out, such information can generally be expected to cause harm because "if individuals become aware of the scope and focus of a pending investigation, they can take defensive actions to conceal their activities, elude detection, and/or suppress or fabricate evidence." (Hardy Decl. ¶ 20.) In the present case, however, the request is from "a third party seeking information to which a potential target apparently has access"; Ms. Clinton already knows the contents of the emails she sent or received. *CREW*, 746 F.3d at 1099. As a result, this Court must conduct "a more focused and particularized review of the documentation on which the government bases its claim that the information [Plaintiff] seeks would interfere with the investigation." *Id.* Accordingly, the FBI must demonstrate how the contents of each email – or category of emails[5] –would interfere with the investigation, by

[5] The category of "email" would not be a proper functional category, as it provides no basis from which the Court might determine whether the contents of the email would interfere with law enforcement proceedings. *Bevis*, 801 F.2d at 1390 ("For example, some categories are identified

explaining, for example, "how revelation of any particular record or record category identified as responsive to [Plaintiff's] request would reveal to particular targets, actual or potential, the scope, direction, or focus of the [FBI] inquiry."

The only other potential harm advanced by the FBI is that "in pending investigations, disclosure of evidence, potential evidence, or information that has not been assessed for evidentiary value could reasonably lead to the public identification of potential witnesses. This could reasonably be expected to impact a pending investigation by compromising witnesses." Again, this argument does not survive the "more focused and particularized review" required here. It is already publicly known that at least one potential witness, Bryan Pagliano, has been granted immunity from prosecution, and former Clinton aide Cheryl Mills has been interviewed by the FBI and Department of Justice.[6] The FBI has not demonstrated, at least on the public record, how disclosure of the contents of the emails retrieved from Ms. Clinton's electronic devices would lead to the public identification of potential witnesses, or that the public identification of such witnesses would compromise the investigation.

III. Segregability

The FBI provides little detail about the segregability of the information contained in the withheld letters from the FBI to the Department of State. (Hardy Decl. ¶¶ 10 n.4; 23.) Given that

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only as 'teletypes,' or 'airtels,' or 'letters.' These provide no basis for a judicial assessment of the FBI's assertions that release of the documents so categorized would interfere with enforcement proceedings. The FBI cannot carry its burden with such irrelevant classifications.")

[6] "Clinton aide Cheryl Mills leaves FBI interview briefly after being asked about emails," M. Zapotsky, The Washington Post (May 10, 2016), available at https://www.washingtonpost.com/world/national-security/clinton-aide-leaves-interview-once-the-fbi-broaches-an-off-limits-topic/2016/05/10/cce5e0e8-161c-11e6-aa55-670cabef46e0_story.html (last accessed May 15, 2016).

the documents are relatively small in number and that review of the documents would likely assist the Court in determining whether any portion of the letter is reasonably segregable, Plaintiff requests that the Court conduct an *in camera* review of the letters.

While *in camera* review of records does require effort and the use of judicial resources and therefore should not be routinely employed on the grounds that "it can't hurt," *in camera* review is appropriate when an agency affidavit does not make a sufficiently specific showing. *Ray v. Turner*, 587 F.2d 1187, 1195(D.C. Cir. 1978). Moreover, "*In camera* inspection does not depend on a finding or even tentative finding of bad faith. A judge has discretion to order In camera inspection on the basis of an uneasiness, on a doubt he wants satisfied before he takes responsibility for a de novo determination." *Id.*

In the present case, there is sufficient doubt about the segregability *vel non* of information in the memoranda to the Department of State, such that *in camera* review is appropriate. Item #4 of Plaintiff's FOIA request did not seek specific categories of documents which would be obviously non-segegable, such as statements from prospective witnesses. Rather, Plaintiff has broadly requested "[a]ny and all correspondence between any person within the FBI and any person within the U.S. Department of State regarding, relating to, or referencing the Clinton Server[.]" Nor does Mr. Hardy's declaration provide a sufficient basis for concluding that no portions of the responsive records can be released. Mr. Hardy's declaration explains that these memoranda are "regarding evidence" and that the "purpose" of these memoranda was to "solicit assistance in furtherance of the FBI's investigation." (Hardy Decl. ¶ 21.) But statements that characterize the gist and intent of a letter are meaningfully different from statements demonstrating that no portion of the letter is releasable. In this regard, Mr. Hardy states only that "there is no reasonably segregable responsive information that can be released at this time without harming

the investigation." (Hardy Decl. ¶ 23.) Such a statement is too conclusory. *See e.g., Johnson v. Exec. Office for United States Attys.*, 310 F.3d 771, 776 (D.C. Cir. 2002) ("In order to demonstrate that all reasonably segregable material has been released, the agency must provide a 'detailed justification' for its non-segregability"); *STS Energy Partners LP v. FERC*, 82 F. Supp. 3d 323, 332 (D.D.C. 2015) (in considering Exemption 7(A), rejecting as insufficient agency's statement in *Vaughn* index that "[t]here is no additional segregable factual information that could be released without revealing protected information"); *Gray v. United States Army Crim. Investigation Command*, 742 F. Supp. 2d 68, 75 (D.D.C. 2010) (in considering Exemption 7(A), rejecting agency's "blanket assertion of non-segregability"); *Jarvik v. CIA*, 741 F. Supp. 2d 106, 120 (D.D.C. 2010) ("conclusory language in agency declarations that do not provide a specific basis for segregability findings by a district court may be found inadequate.")

Here, the FBI has provided a general description of purpose of the letter on the public record and "does not contend that disclosure of information in a redacted version of the letter, such as its date or length, could be harmful." *Lieff, Cabraser, Heimann & Bernstein, LLP v. United States DOJ*, 697 F. Supp. 2d 79, 87 (D.D.C. 2010) (Exemption 7(A) case.) Accordingly, the Court should review the records *in camera* and determine whether there is any information contained in the memoranda that could be segregated and released.

IV. Adequacy of the Search

A. Failure to Search the Central Records System

According to Mr. Hardy, the FBI did not conduct a search of the Central Records System (CRS) in response to Plaintiff's FOIA request. Mr. Hardy does not allege that the CRS is not likely to contain records responsive to Plaintiff's request, however. Indeed, the FBI has

successfully argued to the D.C. that a search of separate e-mail systems is unnecessary precisely because those same records are stored in the CRS. *Mobley v. CIA*, 806 F.3d 568, 581 (D.C. Cir. 2015) ("e-mail systems also are not reasonably likely to result in additional responsive records because the records in them are redundant of records stored in the CRS.") Thus, there is a reasonably likelihood that the CRS would contain records such as emails which are responsive to Items #2, 3, 4, and 5. Mr. Hardy's conclusion a search of the CRS was unnecessary is based only on his assertion that "[t]he subject of plaintiffs request relates to a matter about which the FBI had previously received FOIA requests, and that is also related to other pending FOIA lawsuits involving a number of Federal agencies, primarily the Department of State. Thus, at the time of receipt of plaintiffs request, RIDS was well-aware of the matter, whether any potentially responsive records exist, and the location of any such potentially responsive records. Therefore, RIDS did not need to conduct an independent search of FBI records systems in order to locate potentially responsive records."

The D.C. Circuit recently held that in response to a FOIA request, an agency may rely on a previously-conducted search where the agency produces declarations which "adequately explain the congruence between" the previous search and the FOIA request at issue. *DiBacco v. United States Army*, 795 F.3d 178, 195 (D.C. Cir. 2015). Here, the FBI has not demonstrated that it is entitled to rely on a search for records conducted in response to a previous FOIA request. The FBI has not set forth any facts relating to the scope of the prior request such that Plaintiff or the Court could determine whether there is "congruence." Even if the FBI could demonstrate congruence, it has not set forth facts to show that the previous searches were themselves reasonable. Further, reliance on previous searches remains problematic in this case because new

records may have been created or obtained since the time that any previous search was conducted.

B. Failure to Conduct a Systematic Search

With respect to Items #2, 3, and 5, the FBI relied on an SSA[7] who claimed that he lacked knowledge of any responsive records.[8] (Hardy Decl. ¶ 12.) With respect to Item #4, the FBI relied on the same SSA, who "reviewed the FBI's investigative file to locate records as described by plaintiff." (Hardy Decl. ¶ 13.) After Plaintiff filed suit, "operational personnel were again consulted about records potentially responsive to plaintiff's request"[9] – not in an attempt to locate additional responsive records – but "in order to confirm that disclosure of any such records could reasonably be expected to interfere with a pending investigation." (Hardy Decl. ¶ 10.) Nevertheless, "[a]s a result of [these] additional conversations with operational personnel, the FBI identified three records responsive to Item #4 (FOIA No. 1340457) and determined that it possesses no records responsive to Items #2, #3, and #5 (FOIA Nos. 1340454 and 1340459)." (Hardy Decl. ¶ 10.) Further, with respect to Item #4, "the FBI consulted with attorneys from its Office of the General Counsel ('OGC') who are providing legal support in relation to the pending investigation to determine whether there is correspondence responsive to Item #4 other than the

[7] According to Mr. Hardy's declaration, the FBI "contacted personnel responsible for the pending investigation, *including* a Supervisory Special Agent . . . to determine whether any records as described in plaintiff's request exist." However, there is no indication of whether or not these other personnel are likely to have knowledge of records responsive to Plaintiff's request; whether they in fact located any responsive records; or what type of search, if any, they conducted.

[8] Thus, the FBI's search for records responsive to Items #2, 3, and 5 was not, by definition a "search" under the terms of FOIA. *See* 5 USC § 552(a)(3)(D) (defining a "search" under FOIA as "to review, manually or by automated means, agency records *for the purpose of locating those records which are responsive to a request*") (emphasis added).

[9] Again, no information is provided about these personnel or what they did to search for records.

three records located in the investigative file. OGC personnel located two additional responsive records in OGC files and are aware of no other correspondence with the Department of State that would be within the scope of Item #4.") (Hardy Decl. ¶ 10.)

The FBI's search is inadequate because its methodology "do[es] not reflect any systematic approach to document location," *Weisberg v. United States Dep't of Justice*, 627 F.2d 365, 371 (D.C. Cir. 1980). Although it is reasonable for the FBI to consult with an SSA who is knowledgeable about the investigation, the failure of the SSA to conduct any search whatsoever in response to Items #2, 3 and 5, was unreasonable. Where courts have approved an agency's reliance on the search of a knowledgeable custodian, the knowledgeable custodian actually conducted a search. *See e.g., Adamowicz v. IRS*, 402 F. App'x 648, 651 (2nd Cir. 2010) (agency's search for records with "sole employee" who conducted investigation was "reasonably calculated to discover the requested documents"); *Judicial Watch v. DOD*, 857 F. Supp. 2d 44, 53-55 (D.D.C. 2012) (DOD's search was adequate where search was performed by "relevant individuals" who would be "well aware" of the existence of records); *Pub. Emps. for Envtl. Responsibility v. U.S. Section Int'l Boundary and Water Comm'n.*, 839 F. Supp. 2d 304, 317-18 (D.D.C. 2012) (agency's search was reasonable where employee with "significant experience" in the subject matter conducted search for responsive documents); *Amnesty Int'l USA v. CIA*, 728 F. Supp. 2d 479, 499-500 (S.D.N.Y. 2010) (agency's search was reasonable where the search "included having the person most knowledgeable regarding [subject of request] inquire into the existence of [the records]"), *aff'd in part, rev'd in part & remanded on other grounds*, 539 F.3d 1143 (9th Cir. 2008). Here, by contrast, there is no indication the SSA searched anything, aside from his memory, with respect to Items #2, 3, and 5. Nor is there any indication of how the "operation personnel" and OGC personnel conducted their search with respect to Item #4.

Moreover, the FBI does not explain why it limited its "search" to OGC, one SSA, and unspecified "operation personnel." While these individuals may have been a reasonable source of information about responsive records, the FBI does not explain how or why they are the *only* sources reasonably likely to have responsive records. *See Valencia-Lucena*, 180 F.3d at 326 ("The agency cannot limit its search to only one or more places if there are additional sources that are likely to turn up the information requested") (internal quotation marks omitted); *Church of Scientology v. IRS*, 792 F.2d 146, 151 (D.C. Cir. 1986) ("Summary judgment . . . require[s] an affidavit reciting facts which enable the District Court to satisfy itself that all appropriate files have been searched, ... [s]uch an affidavit would presumably identify the searched files and describe at least generally the structure of the agency's file system which makes further search difficult") *Bothwell*, 2014 U.S. Dist. LEXIS 144151, at *17 (agency declaration inadequate where it "does not name the databases searched by the NCS and DS, nor does it provide a scheme of the database systems or any details of the final search strategy other than the use of names.")

In determining whether the agency's search was adequate, the court must examine the reasonableness of the agency's selection of the offices to be searched. *See Amnesty Int'l USA v. CIA*, Case No. 07-cv-5435-LAP, 2008 U.S. Dist. LEXIS 47882 at *26 (S.D.N.Y. June 19, 2008) ("[A]n agency's decisions about which offices . . . to search . . . must also be 'reasonably calculated to uncover all relevant documents.'") Given the nature of Plaintiff's request, it seems readily apparent that records responsive to Items #2, 3, 4, and 5 would likely be located in offices which were not searched by the FBI. For example, because Items #2 and 3 explicitly seek records about authorization to "disclose to the media" certain information, the FBI's National Press Office, the Investigative Publicity and Public Affairs Unit (within the Washington Field Office),

and any relevant field offices' Office of Public Affairs would be reasonably likely to possess responsive records. Further, given the high-profile nature of this case, the offices of the Director, Deputy Director, Associate Deputy Director, Chief of Staff, and Deputy Chief of Staff should have been searched, or alternatively, the FBI should have explained why these offices would not be reasonably likely to possess responsive records. Additionally, because of the involvement of various congressional oversight committees (i.e., the House Oversight Committee, the House Science Committee, House Judiciary Committee, and the House Select Committee on Benghazi), it is likely that the FBI's Office of Congressional Affairs would be reasonably like to have responsive records as well.

The only attempt the FBI makes at explaining why the FBI limited its search is the assertion in Mr. Hardy's declaration that "any records responsive to plaintiff's request are located in files pertaining to a pending investigation." (Hardy Decl. ¶ 24.) But this is precisely the type of conclusory statement that this Court has previously found insufficient to establish that a search was reasonable and adequate; it does not describe *how* the FBI determined that any responsive records would be located in those files. *Nat'l Sec. Counselors v. CIA*, 960 F. Supp. 2d 101, 154 (D.D.C. 2013) ("[A]morphous terms like . . . 'all files reasonably likely to contain responsive materials,' are not sufficiently detailed without any explanation of how the agency determined which records systems and files were relevant") (some internal quotation marks omitted).

Respectfully Submitted,

/s/ Jeffrey L. Light

Jeffrey L. Light
D.C. Bar #485360
1712 Eye St., NW

Suite 915
Washington, DC 20006
(202)277-6213
Jeffrey@LawOfficeOfJeffreyLight.com

/s/ Ryan S. James
Ryan S. James
D.C. Bar #496272
5208 Capricorn Loop
Killeen, TX 76542
(254)289-7459
RSJamesLaw@gmail.com

Counsel for Plaintiff