

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

[REDACTED]

**STATEMENT OF UNDISPUTED FACTS IN SUPPORT OF
PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT**

I. In [REDACTED] the Federal Bureau of Investigation (FBI) served a
National Security Letter (NSL) on [REDACTED] demanding information about one

IV. The government has used and continues to use the gag to prohibit disclosure of a great deal of innocuous and non-sensitive information.

▲ The government has used the gag to prevent the public from learning about

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1. I am not a member of the union.

[The remainder of the page is heavily obscured by horizontal black bars, rendering the text illegible.]

[REDACTED] Third Beeson Decl. ¶ 27; Third Beeson Decl.
Exh. 21-22; Second [REDACTED] Decl. ¶¶ 3, 14, 41.

VIII. The government's use of the gag provision has prevented and continues to

[REDACTED]