



January 18, 2019

Interim President Satish Udpa  
c/o Freedom of Information Act Office  
Michigan State University  
408 West Circle Drive  
Room 1 Olds Hall  
East Lansing, Michigan 48824

*Sent via U.S. Mail and Electronic Mail (foia@msu.edu)*

**Re: Appeal from denial of FOIA Request No. MSUF099818**

Dear President Udpa:

The Foundation for Individual Rights in Education is conducting a national survey of institutions of higher education, seeking information about lists of words they prohibit from their official social media accounts, as well as who is prohibited from interacting with other members of the public on those accounts. This survey rises from recent federal court decisions holding that public actors' social media restrictions violate the First Amendment.<sup>1</sup>

Over 175 institutions have already produced records in response to this survey, including four Michigan institutions.

Unfortunately, Michigan State University ("MSU") is not one of them. Instead, MSU has cited objections concerning public safety, including an exception established in the wake of the terrorist attacks of September 11, 2001. MSU is the *only* institution in Michigan to refuse to produce these records, and the *only* institution—out of hundreds of colleges and universities surveyed across the country—to claim that public disclosure creates a risk of terrorism.

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<sup>1</sup> For example, a federal court held that President Trump's blocking of Twitter critics violated the First Amendment. *Knight First Amendment Inst. at Columbia Univ. v. Trump*, 302 F. Supp. 3d 541 (S.D.N.Y. May 23, 2018). This month, the United States Court of Appeals for the Fourth Circuit held that the interactive comment section of a public official's Facebook page was a public forum. *Davison v. Randall*, No. 17-2002 (4th Cir. Jan. 7, 2019). See also, e.g., *Lloyd v. City of Streetsboro*, No. 18-3485, 2018 U.S. App. LEXIS 36090, \*9-13 (6th Cir. Dec. 20, 2018) (reversing dismissal where plaintiff alleged being blocked on an official Facebook page); *Leuthy v. LePage*, No. 17-cv-00296, 2018 U.S. Dist. LEXIS 146894, \*36-43 (D. Maine Aug. 29, 2018) (governor's Facebook page); *Price v. City of New York*, No. 15-cv-5871, 2018 U.S. Dist. LEXIS 105815, \*25-46 (June 25, 2018) (NYPD precinct blocked Twitter user); *Dingwell v. Cossette*, No. 3:17-cv-01531, 2018 U.S. Dist. LEXIS 95832 (D. Conn. June 7, 2018) (critic blocked from police Facebook page). This request is patterned after a records request concerning a university's Facebook page. *People for the Ethical Treatment of Animals, Inc., v. Young*, No. 4:18-CV-01547 (S.D. Tex. Sept. 10, 2018), ECF No. 31 (order denying motion to dismiss First Amendment claims).

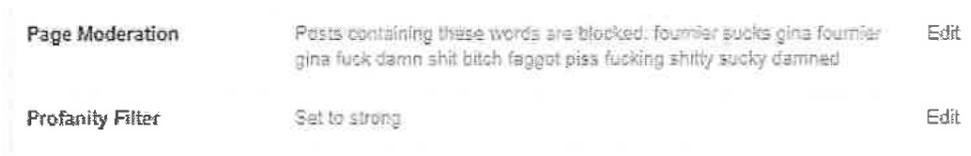
This is an administrative appeal to you in your capacity as head of Michigan State University, pursuant to Mich. Comp. Laws Ann. § 15.240(1)(a). MSU must reverse the denial of my October 15, 2018, FOIA request for the reasons described herein.

### **I. The Request and the Denial**

The October 15, 2018, request seeks three categories of records.

The first category relates to information pertaining to the content MSU prohibits from being posted on its official Facebook page. Facebook permits its users to create lists of custom words prohibited from being posted on the user's Facebook page. Facebook also provides a "profanity filter" with three settings ("off," "medium," and "strong") which employs a list of prohibited words established by Facebook. Words on either the custom words list or Facebook's profanity filter list are deleted.

An example of the relevant information provided by another Michigan institution, enclosed, looks like this:



The second and third categories respectively sought the data relating to the particular Facebook and Twitter users blocked from posting on or interacting with the university's official social media accounts.

On November 6, MSU denied the requests in total, interposing objections premised on three exceptions to the Michigan Freedom of Information Act. Specifically, MSU averred that the records were exempt under Sections 13(1)(u), which concerns security measures related to the ongoing security of a public body; (y), which exempts information of measures designed to protect cybersecurity and ward against terrorism; and (z), which exempts information that, if disclosed, puts particular persons at risk of a cybersecurity incident.

Copies of the request and denial are enclosed.

### **II. MSU's Improper and Unfounded Claim That Concealing Its Censorship Is Justified by Public Safety and Risk of Terrorism**

MSU can find no shelter in the exemptions it cites. These exemptions, narrowly construed, concern threats to public safety and security. MSU instead invokes them to shield its restrictions on speech from public scrutiny.

**A. *MSU bears the burden of establishing FOIA exemptions, which are narrowly construed.***

Michigan has long been “at the vanguard of those states holding that a citizen’s accessibility to public records must be given the broadest possible effect.” *Booth Newspapers, Inc. v. Muskegon Prob. Judge*, 15 Mich. App. 203, 207 (1968) (quoting 1961–62 Op. Att’y Gen. 581, 587). Accordingly, Michigan’s FOIA is “intended primarily as a prodisclosure statute” and any “exemptions to disclosure are to be narrowly construed.” *Swickard v. Wayne Cty. Med. Examiner*, 438 Mich. 536, 544 (1991). In addition to applying a narrow construction, Michigan courts have long held that “the burden of proving the need for an exemption rests on the public body asserting its application.” *Booth Newspapers v. Univ. of Mich. Bd. of Regents*, 444 Mich. 211, 232 (1993).

MSU has not met its heavy burden. None of the cited exemptions, each discussed in turn below, apply either in letter or in spirit. MSU’s threadbare response makes no effort to substantiate its speculative assertion that releasing the requested information—provided by hundreds of other state actors<sup>2</sup>—presents a legitimate threat to public safety.

**B. *MSU’s reliance on Section 13(1)(y), a post-9/11 measure concerning cybersecurity and terrorism, cannot be justified.***

Section 13(1)(y), invoked by MSU as justifying its refusal to produce Facebook and Twitter records, was enacted as a counterterrorism measure in the wake of the terrorist attacks of September 11, 2001. In analyzing the legislation underlying the exemption, the House Legislative Analysis Section explained:

As part of the legislative response to the September 11, 2001 terrorist attacks, legislation has been offered to allow public bodies to exempt from disclosure information related to security measures. The language has been carefully crafted to narrow the proposed exemption in such a manner as to protect sensitive information while preserving the act’s intent to provide broad public disclosure of government information.<sup>3</sup>

The analysis explained that FOIA had an “important purpose” in “promoting citizen access” to government records. However, concerns following 9/11 required that “some information should legitimately be withheld” where public disclosure “would harm individuals or the public at large.” Examples of such information included “blueprints of nuclear plants and water supply systems, emergency response plans, intelligence and threat assessments, [and] security procedures for public transit systems.”

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<sup>2</sup> In addition to the 175+ institutions that have provided this information to FIRE, *ProPublica* received similar information after issuing public records requests to all 50 governors and 22 federal agencies. Leora Smith & Derek Kravitz, *Governors and Federal Agencies Are Blocking Nearly 1,300 Accounts on Facebook and Twitter*, PROPUBLICA, Dec. 8, 2017, <https://www.propublica.org/article/governors-and-federal-agencies-are-blocking-accounts-on-facebook-and-twitter>.

<sup>3</sup> H. LEGIS. ANALYSIS SECTION, HB 5349 AS ENROLLED, *available at* <http://www.legislature.mi.gov/documents/2001-2002/billanalysis/House/pdf/2001-HLA-5349-b.pdf>.

Blacklists of words and people on social media sites were not what the legislature had in mind when it enacted this exemption. Rather, as the legislative analysis of the exemption forewarned, there was a “potential for abuse” lurking in the creation of new exemptions, which may “provide unscrupulous officials with a way to hide information[.]” trading “a free, open society” for “increasing governmental power in order to increase public safety and security.” Shielding government censorship from public scrutiny on the basis of public security is precisely the sort of tradeoff that civil liberties advocates warned of when governments rushed to enact new measures following the September 11 attacks.<sup>4</sup> That a public university embraces an entirely self-serving opacity-for-security rationale is disappointing.

Even ignoring the legislative intent behind the exemption, the text of the amendment provides no refuge for MSU’s Facebook and Twitter information. The exemption applies only to “information of measures designed to protect the security or safety of persons or property[.]” A list of what words may not be posted to a university’s Facebook page is not information about measures designed to protect public safety and security.

Further, this exemption does not apply in two circumstances, both of which are applicable here.

First, it does not apply where disclosure of the information “would not impair” the “ability to protect the security or safety of persons or property[.]” Section 13(1)(y). Disclosing information about who is blocked or what words are prohibited would not impair security or safety. In the worst case scenario, a university employee might believe they have to delete an offending post or block a new user account—an act which may well violate the user’s First Amendment rights.

Second, the exemption is inapplicable where “the public interest in disclosure outweighs the public interest in nondisclosure in the particular instance.” Even assuming there were any cognizable security rationale justifying MSU’s withholding the requested records, it is substantially outweighed by the public’s interest in revealing a public university’s efforts to censor speech. As the Supreme Court explained, there is “no room for the view that, because of the acknowledged need for order, First Amendment protections should apply with less force on college campuses than in the community at large.” *Healy v. James*, 408 U.S. 169, 180 (1972). To the contrary, “the vigilant protection of constitutional freedoms is nowhere more vital than in the community of American schools.” *Id.* (quoting *Shelton v. Tucker*, 364 U. S. 479 (1960)). Further, it is “clear” that “cyberspace” and “social media in particular” are among “the most important places . . . for the exchange of views.” *Packingham v. North Carolina*, 137 S. Ct. 1730, 1735 (2017).

Because this exemption is inapplicable in either letter or intent, because disclosure would not impair public safety or security, and because there is a profound public interest in identifying internet censorship by public institutions, MSU cannot invoke this exemption and must produce the requested records.

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<sup>4</sup> See, e.g., Kristen Elizabeth Uhl, *The Freedom of Information Act Post-9/11: Balancing the Public’s Right to Know, Critical Infrastructure Protection, and Homeland Security*, 53 AM. U. LAW REV. 261, 303 (Oct. 2003).

**C. Section 13(1)(u) exempts disclosures related to cybersecurity defenses.**

Section 13(1)(u) provides that a public institution “may exempt” information concerning its “security measures,” including in particular its “security plans, security codes and combinations, passwords, passes, keys, and security procedures,” but only “to the extent” that information implicates the “ongoing security” of the institution.

A list of prohibited words and users on social media accounts does not amount to a “security measure” of any sort, much less a plan, code, password, or procedure. The information sought reveals no usernames, passwords, or other login credentials. Rather, the information amounts to little more than a list of profane, offensive, or otherwise unwelcome words that cannot be discussed in a public forum operated by a government actor. This censorship, itself, violates the First Amendment.<sup>5</sup>

That these restrictions are not “security measures” is readily apparent when examining what would happen if they were revealed.

For example, revealing the customized list of censored words would not allow any users to post those words. Even if a user were able to post any of the prohibited words, it is exceedingly unlikely that they would, as a result, be able to compromise the security of the website, the university’s infrastructure, or the browser of a visiting user.

Further, to the extent that the requested information would reveal which of Facebook’s profanity filters (“off,” “medium,” or “strong”) is utilized by MSU, that would not provide information that could create a security risk, as Facebook does not disclose what words are blocked through these filters.<sup>6</sup> Knowing which setting is used would only allow a user to make a slightly more educated guess as to which words Facebook’s filters are likely to hide.

With respect to blocked users, there is no reasonable risk that a blocked user will become a security risk after discovering, by virtue of a public records request, their inability to interact with the pages. This is true for at least two reasons.

First, the worst-case scenario is that a blocked user, having discovered that he or she is blocked, may create a new, unblocked Facebook or Twitter account. Not only is it highly unlikely that a user would first learn this from a public records request, but the harm to the university is *de minimis*: it would have to engage in the ministerial act of blocking the new account. There is no scenario in which this poses a risk to the health, safety, or security of any institution or individual.

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<sup>5</sup> It is doubtful that the university, as a state actor facilitating a public forum, may block particular words at all. For example, in *Cohen v. California*, the Supreme Court held that states have no power to forbid “particular words” in order to “cleanse public debate to the point where it is grammatically palatable to the most squeamish among us,” as barring specific words would also run “a substantial risk of suppressing ideas in the process.” 403 U.S. 15, 25–26 (1971).

<sup>6</sup> Facebook explains that its profanity filters’ blacklist is determined “by using the most commonly reported words and phrases marked offensive by the community.” FACEBOOK, *How can I proactively moderate content published by visitors on my Page?*, <https://www.facebook.com/help/131671940241729> (last visited Jan. 16, 2019).

Second, blocked users are already likely to know that they are blocked. Twitter, for example, informs a user that they are blocked from viewing or interacting with a particular profile:



Similarly, when a Facebook user is blocked from a particular page, Facebook removes the familiar “Write a post...” and “Write a comment...” boxes from the interactive spaces of the page, and a user cannot “like” the page, its posts, or its comments.

Because both Facebook and Twitter provide visual indications to users when they are blocked, a user is unlikely to first learn from public records that they are blocked from the site. Even if that was the case, the burden on the university is slight and cannot reasonably be described as a threat to health or safety. Accordingly, MSU’s reliance on this exemption is unfounded.

***D. Section 13(1)(z) is meant to facilitate law enforcement investigations into cybersecurity breaches, not censorship.***

Section 13(1)(z), enacted in 2018, was intended to reassure “companies who suffer from a cybersecurity incident” who are “wary of providing sensitive information to the police to help find and stop the perpetrator,” and were concerned that “the shared information in the police report could be requested under FOIA.”<sup>7</sup> Accordingly, information is exempt from disclosure if “as a result of disclosure of the information,” a person “may . . . become a victim of a cybersecurity incident” or if disclosures would reveal the person’s “cybersecurity plans or cybersecurity-related practices, procedures, methods, results, organizational information system infrastructure, hardware, or software.”

This exception was not intended to provide government officials with blanket authority to shield their own online activity. Revealing that a person’s account is blocked by a public university does not create or increase any risk that the person will be exposed to hacking or other cybersecurity incidents for several reasons.

First, Facebook and Twitter play important social, political, and communicative roles for their billions of users. *Packingham*, 137 S. Ct. at 1735. But they are not, for example, a financial services entity whose membership should be zealously guarded. Nor does the information reveal anything about the user other than their display name; it does not, for example, reveal their username, password, or other login credentials. Revealing that a Facebook or Twitter

<sup>7</sup> H. FISCAL AGENCY, LEGISLATIVE ANALYSIS: HB 4973 AS ENACTED (2018), *available at* <https://www.legislature.mi.gov/documents/2017-2018/billanalysis/House/pdf/2017-HLA-4973-6C3A3AD7.pdf>.

account exists is not likely to be information that is either attractive or useful to criminals with designs of compromising anyone's security.

Second, and moreover, the existence of Facebook and Twitter accounts is already almost universally public. Both services are *intended* to allow members of the public to connect with each other's accounts. To facilitate these ends, both Facebook and Twitter provide functions to allow their users to locate and connect with other users. Revealing that someone has a Facebook or Twitter account is information that is already public and, even if it were not, it is highly unlikely to lead to security threats.

Applying an exemption intended to facilitate law enforcement investigations to instead shield government censorship from scrutiny is contrary to the letter and spirit of FOIA.<sup>8</sup>

**III. This appeal requires a response within ten business days.**

Under Michigan law, this appeal requires a response within ten business days. Mich. Comp. Laws Ann. § 15.240(2). For the foregoing reasons, MSU must reverse its initial position and join the 175 institutions that have produced the requested records.

Sincerely,



Adam Steinbaugh  
Director, Individual Rights Defense Program

Encl.

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<sup>8</sup> Even if this exemption were applicable, it could be easily remedied by redacting the names of accounts that cannot be found in Facebook's search function. Providing this information would still allow the public to identify the number of people blocked on Facebook or Twitter. If isolated information is exempt from disclosure, the nonexempt material must be separated and made available, and a description of the redacted material provided. Mich. Comp. Laws § 15.244.

# Exemplar of Facebook Settings from Oakland Community College

The screenshot shows the Facebook settings interface for the 'Oakland Community College (Official)' page. The browser address bar shows 'book.com/OCCofficial/settings/?'. The page title is 'Oakland Community College (Official)'. The user is logged in as 'Miranda'. The settings are organized into a left-hand navigation menu and a main content area.

**Navigation Menu (Left):**

- General
- Messaging
- Edit Page
- Post Attribution
- Notifications
- Messenger Platform
- Page Roles
- People and Other Pages
- Preferred Page Audience
- Authorizations
- Branded Content
- Instagram
- Featured
- Crossposting
- Page Support Inbox
- Wi-Fi Network
- Activity Log

**Main Settings Area (Right):**

Setting Name	Current Value	Action
Page Visibility	Page published	Edit
Page Verification	Page is not verified	Edit
Visitor Posts	Choose who can publish to your Page timeline	Edit
Comments on Posts	People can add photo or video comments on posts.	Edit
Messages	People can contact my Page privately.	Edit
Tagging Ability	Other people can tag photos posted on my Page.	Edit
Others Tagging this Page	People and other Pages can tag my Page.	Edit
Page Location for Effects	Other people can use your Page's location for photo and video frames and effects.	Edit
Country Restrictions	Page is visible to everyone.	Edit
Age Restrictions	Page is shown to everyone.	Edit
Page Moderation	Posts containing these words are blocked: fourmier suoks gina fourmier gina fuck damn shit bitch faggot piss fucking shitty sucky dammed	Edit
Profanity Filter	Set to strong	Edit
Similar Page Suggestions	Choose whether your Page is recommended to others	Edit
Page Updates	Page posts are automatically published when you update Page info, reach milestones, receive reviews and more.	Edit
Post in Multiple Languages	Ability to write posts in multiple languages is turned off	Edit
Translate Automatically	Your posts may show translations automatically for people who read other languages	Edit
Comment Ranking	Most recent comments are shown for my Page by default.	Edit
Content Distribution	Downloading to Facebook is allowed.	Edit
Download Page	Download Page	Edit

At the bottom right, there is a 'Chat (1)' notification. The Windows taskbar is visible at the very bottom of the image.



FIRE FOIA &lt;foia@thefire.org&gt;

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## FIRE Public Records Request to Michigan State University

1 message

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**FIRE FOIA** <foia@thefire.org>  
To: foia@msu.edu

Mon, Oct 15, 2018 at 2:02 PM

To whom it may concern:

This is a request for records pursuant to the Michigan Freedom of Information Act (Mich. Comp. Laws Ann. §§ 15.231 et seq.). If you are not the records custodian for Michigan State University, please let me know the correct person to contact.

This request seeks records relating to restrictions and settings concerning the official Facebook and Twitter accounts for Michigan State University, and should be directed to the person responsible for operating those accounts.

### **RECORDS REQUESTED**

I request the following records:

1. A copy of the settings for the Facebook page maintained by Michigan State University (available at <https://www.facebook.com/spartans.msu>). This list is accessible by (A) logging into the Facebook page as an administrator, and then (B) clicking "Settings" at the top of the official page. The URL should look like: <https://www.facebook.com/spartans.msu/settings/?tab=settings>.
2. A copy of the list of people or pages banned from the Facebook page referenced above. This list is accessible by: (A) logging into the Facebook page as an administrator, (B) clicking "Settings" at the top of the official page, (C) clicking "People and Other Pages" in the left column, and (D) selecting "Banned People and Pages" from the drop-down menu. The final URL should look like: [https://www.facebook.com/spartans.msu/settings/?tab=people\\_and\\_other\\_pages](https://www.facebook.com/spartans.msu/settings/?tab=people_and_other_pages).
3. A list of the "blocked accounts" by the Twitter account maintained by Michigan State University (available at <https://twitter.com/michiganstateu>). This list is accessible by navigating to this URL while logged into the account: <https://twitter.com/settings/blocked>.

**Fee waiver request:** This request concerns a matter of public interest. The social media restrictions imposed by public institutions and officials — including the [president](#), [governors](#), and [public universities](#) — have been challenged on First Amendment grounds. This survey seeks to explore the extent to which public colleges and universities have similar restrictions.

The public interest would be well-served by granting a fee waiver. The request is not being sought for a commercial purpose, but is instead sought by a [nonprofit organization](#) to provide the public

with information concerning the conduct of government actors as that conduct pertains to civil liberties in higher education.

If a fee waiver is not granted, please apprise me if the estimated costs will exceed \$10. **Please also provide a W-9 form.**

**Request for expedited processing:** Completion of this survey depends on the institution with the slowest response time. We request that Michigan State University produce responsive records on an expedited basis. As you may be aware, a public body has five business days to respond to requests. (Mich. Comp. Laws. Ann § 15.235(2)).

**Appeal information:** If you deny any portion, or all, of this request, please provide me with a written explanation of the reason(s) for your denial, including a citation to each specific statutory exemption you believe justifies the refusal to release the information and notify me of the appeal procedures available to me under the law. If you conclude that portions of the records that I request are exempt from disclosure, please release the remainder of such records for inspection and copying, redacting only the portion or portions that you claim are exempt.

**Request for Privilege Log:** If any otherwise responsive documents are withheld on the basis that they are privileged or fall within a statutory exemption, please provide a privilege log setting forth (1) the subject matter of the document; (2) the person(s) who sent and received the document; (3) the date the document was created or sent; and (4) the basis on which Michigan State University contends it is entitled to withhold the document from production.

Finally, be advised that a court "shall" award attorneys' fees, costs, and disbursements to a requestor who prevails in an action under the FOIA. (Mich. Comp. Laws Ann. § 15.240(6)).

We're hopeful that Michigan State University will provide a timely response. If any part of this request is vague or ambiguous, or if we could otherwise be of assistance in interpreting or narrowing this request, please do not hesitate to contact me by phone or email.

Best,

**Adam B. Steinbaugh**

Director, Individual Rights Defense Program  
Foundation for Individual Rights in Education  
510 Walnut Street  
Suite 1250  
Philadelphia, PA 19106  
(215) 717-3473  
[adam@thefire.org](mailto:adam@thefire.org)

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# MICHIGAN STATE UNIVERSITY

DATE: November 6, 2018

TO: Adam B. Steinbaugh, Director, Individual Rights Defense Program  
Foundation for Individual Rights in Education – adam@thefire.org

FROM: Rebecca Nelson, Director and Freedom of Information Act (FOIA) Officer  
Michigan State University FOIA Office

*Rebecca Nelson*

SUBJECT: FOIA Response

This is written in response to the FOIA request that you emailed to this Office on October 15, 2018, for “the settings for the Facebook page maintained by Michigan State University”; “the list of people or pages banned from the Facebook page referenced above”; and a “list of the ‘blocked accounts’ by the Twitter account maintained by Michigan State University.”

Sections 13(1)(u), (y), and (z), of the Michigan Freedom of Information Act (MIFOIA), provide that “A public body may exempt from disclosure as a public record under this act any of the following... (u) Records of a public body’s security measures, including security plans, security codes and combinations, passwords, passes, keys, and security procedures, to the extent that the records relate to the ongoing security of the public body... (y) Records or information of measures designed to protect the security or safety of persons or property, or the confidentiality, integrity, or availability of information systems, whether public or private, including, but not limited to, building, public works, and public water supply designs to the extent that those designs relate to the ongoing security measures of a public body, capabilities and plans for responding to a violation of the Michigan anti-terrorism act, chapter LXXXIII-A of the Michigan penal code, 1931 PA 328, MCL 750.543a to 750.543z, emergency response plans, risk planning documents, threat assessments, domestic preparedness strategies, and cybersecurity plans, assessments, or vulnerabilities, unless disclosure would not impair a public body’s ability to protect the security or safety of persons or property or unless the public interest in disclosure outweighs the public interest in nondisclosure in the particular instance... (z) Information that would identify or provide a means of identifying a person that may, as a result of disclosure of the information, become a victim of a cybersecurity incident or that would disclose a person’s cybersecurity plans or cybersecurity-related practices, procedures, methods, results, organizational information system infrastructure, hardware or software.” Each of the three portions of your request is hereby respectfully denied pursuant to one or more of the foregoing MIFOIA exemptions.



## FREEDOM OF INFORMATION ACT OFFICE

**Michigan State  
University**

408 West Circle Drive  
Room 1 Olds Hall  
East Lansing, MI 48824  
517-353-3929  
Fax: 517-353-1794  
foia@msu.edu  
<http://foia.msu.edu>

The MIFOIA provides that when a public body denies all or a portion of a request, the requester may do one of the following: (1) submit an appeal of the determination to the head of the public body; or (2) commence a civil action in the court of claims to compel the public body’s disclosure of the records. If you wish to seek judicial review of any denial, you must do so within 180 days of the date of this letter. If the court of claims orders disclosure of all or a portion of the public record(s) to which you have been denied access, you may receive attorneys’ fees and, in certain circumstances, damages under the MIFOIA. Should you choose to file an appeal with the University regarding this response to your request, you must submit a written communication to this Office expressly stating that it is an “appeal” of this response. In your appeal, please state what records you believe should have been disclosed to you. You must also state the reasons you believe any denial of your MIFOIA request should be reversed. This Office will arrange for the processing and review of your appeal.

Pursuant to Section 4(4) of the MIFOIA, the University’s procedures and guidelines for processing MIFOIA requests can be found at <http://foia.msu.edu>.

MSUF099818