



U.S. Department of Justice
Office of Information Policy
Sixth Floor
441 G Street, NW
Washington, DC 20530-0001

Telephone: (202) 514-3642

December 3, 2021

Austin Evers
American Oversight
1030 15th NW, Suite B255
Washington, D.C. 20005
foia@americanoversight.org

Re: DOJ-2020-00226
20-cv-3783 (D.D.C.)
VRB:SJD

Dear Austin Evers:

This is a supplemental response to your Freedom of Information Act requests,¹ submitted and received in this Office on February 14, 2020, seeking various records pertaining to Scott Brady, U.S. Attorney for the Western District of Pennsylvania, or his office, and review of information provided by Rudolph (Rudy) Giuliani to the Department, including information concerning former Vice President Joseph Biden, dating from November 1, 2019.

As referenced in the parties' October 13, 2021 Joint Status Report (ECF No. 16), we agreed to provide a "draft Vaughn Index" to facilitate your review of our withholdings. In the course of our review, we identified fifteen additional pages containing responsive records located by our initial search that were mistakenly excluded from our previous responses. I have determined that seven of these pages are appropriate for release with withholdings made pursuant to Exemptions 5 and 6 of the FOIA, 5 U.S.C. § 552(b)(5) and (b)(6). The remaining eight pages are being withheld in full pursuant to Exemption 5 of the FOIA. Exemption 5 pertains to certain inter- and intra-agency communications protected by civil discovery privileges. Exemption 6 pertains to information the release of which would constitute a clearly unwarranted invasion of personal privacy.

For your information, Congress excluded three discrete categories of law enforcement and national security records from the requirements of the FOIA. See 5 U.S.C. § 552(c) (2018). This response is limited to those records that are subject to the requirements of the FOIA. This is a standard notification that is given to all our requesters and should not be taken as an indication that excluded records do, or do not, exist.

¹ As noted in this Office's acknowledgement letter dated March 12, 2020, your two requests, originally assigned tracking numbers FOIA-2020-00226 and FOIA-2020-00227, respectively, have been aggregated under the tracking number DOJ-2020-00226.

If you have any questions regarding this response, please contact Marcia Sowles of the Department's Civil Division, Federal Programs Branch at 202-514-4960.

Sincerely,



Vanessa R. Brinkmann

Enclosures

OIP Informal Summary of Search & Explanation of Withholdings in *American Oversight v. U.S. Dep't of Justice, 20-cv-03783 (D.D.C.)*¹

Plaintiff's Request

- Plaintiff's two FOIA requests² dated February 14, 2020 sought various categories of records from the Offices of the Attorney General (OAG) or Deputy Attorney General (ODAG); specifically:
 - "Written approval from the Attorney General (AG) or Deputy Attorney General (DAG) authorizing U.S. Attorney for the Western District of Pennsylvania Scott Brady, or anyone in his office, to create and/or administer a process for receiving purported investigatory information from Rudy Giuliani concerning matters that relate to former Vice President Biden, a declared presidential candidate;"
 - "A copy of the Attorney General's order (and any attachments to that order) directing U.S. Attorney for the Western District of Pennsylvania Scott Brady, or anyone in his office, to conduct an evaluation, review, probe, assessment, 'intake process,' preliminary investigation, or other investigation of any information received from Rudy Giuliani, including information that may concern former Vice President Biden, or for any other matters outside his ordinary jurisdiction as U.S. Attorney for the Western District of Pennsylvania;"
 - "All directives or guidance provided to U.S. Attorney for the Western District of Pennsylvania Scott Brady, or anyone in his office, regarding an evaluation, review, probe, assessment, 'intake process,' preliminary investigation, or other investigation of any information received from Rudy Giuliani, including information that may concern former Vice President Biden, or for any other matters outside his ordinary jurisdiction as U.S. Attorney for the Western District of Pennsylvania;"
 - "All records reflecting communications . . . between 1) the Office of the Attorney General or the Office of the Deputy Attorney General and (2) U.S. Attorney for the Western District of Pennsylvania Scott Brady, or anyone in his office regarding an evaluation, review, probe, assessment, preliminary investigation, or other investigation of any information received from Rudy Giuliani, including information that may concern former Vice President Biden, or for any other

¹ OIP is providing this informal search summary to American Oversight to facilitate the parties' confidential and good faith efforts to narrow or eliminate issues for judicial resolution in the captioned case. The information provided may be used for that purpose only and is protected by Federal Rule of Evidence 408. OIP believes the information provided herein to be accurate; however, OIP reserves the right to present additional or different information in any filing that may ultimately be made with the court.

² As noted in OIP's acknowledgment letter dated March 13, 2020, OIP aggregated Plaintiff's two requests under a single tracking number (DOJ-2020-00226) as a matter of administrative efficiency and in an effort to facilitate OIP's records searches and the processing and consultation of potentially responsive records, and ultimately to more efficiently respond to Plaintiff's requests.

matters outside his ordinary jurisdiction as U.S. Attorney for the District of Western Pennsylvania;”

- “All records reflecting communications . . . within the Office of the Attorney General or the Office of the Deputy Attorney General regarding any evaluation, review, probe, assessment, “intake process,” preliminary investigation, or other investigation of any information received from Rudy Giuliani, including information which may concern former Vice President Biden.”
- Plaintiff’s requests specified a date range of November 1, 2019 to the date the search was conducted.

OIP’s Searches

- OIP initiated its search on March 17, 2020 by sending search notifications to its points of contact in OAG and ODAG, providing potential records custodians with Plaintiffs’ FOIA request and instructions to identify any additional potentially responsive records that would otherwise not be captured by OIP’s remote electronic searches. OIP engaged with knowledgeable staff in each of these offices to determine who, if anyone, may have had records potentially responsive to Plaintiff’s FOIA requests.
- Based on these communications with OAG and ODAG, OIP conducted remoted electronic searches of the following custodians from each office:
 - OAG: Attorney General Barr, Rachel Parker-Bissex, James Burnham, Taylor Cole, Camellia Delaplane, Seth DuCharme, Jeff Favitta, Gene Hamilton, William Levi, John Moran, Clare Morell, Brian Rabbitt, Gregg Sofer, Theresa Watson, and Lauren Willard.
 - ODAG: Jeffrey Rosen, Richard P. Donoghue, Seth DuCharme, Patrick Hovakimian, and John Moran.
- OIP conducted searches of the above-identified custodians’ email accounts, electronic calendars and electronic files from November 1, 2019 through March 17, 2020, the date OIP initiated its search.
 - OIP conducted keyword searches of each of these custodians’ records using the following term combinations:
 - “intake process” AND Biden
 - “intake process” AND Ukraine
 - “intake process” AND Giuliani³
 - “intake process” AND Rudy
 - USAPAW AND Biden
 - USAPAW AND Ukraine
 - USAPAW AND Giuliani
 - USAPAW AND Rudy
 - WDPA AND Biden
 - WDPA AND Ukraine

³ In all instances, OIP also searched for the following common misspellings of Giuliani: “Guiliani,” “Gulliani,” and “Giuliana.”

- WDPA AND Giuliani
 - WDPA AND Rudy
 - “W.D. Pa.” AND Biden
 - “W.D. Pa.” AND Ukraine
 - “W.D. Pa.” AND Giuliani
 - “W.D. Pa.” AND Rudy
 - Biden AND Giuliani
 - Biden AND Rudy
 - Ukraine AND Giuliani
 - Ukraine AND Rudy
- OIP also searched for all emails sent to or received from USA Brady, without keyword search modifiers.
- OIP also performed a series of searches in the Departmental Executive Secretariat (DES), the official records repository for OAG and ODAG, which maintains records of all formal, controlled correspondence sent to or from those offices from January 1, 2001, to the present. The DES also maintains certain OLA records, including formal, controlled correspondence with Congress. Within the DES, OIP conducted the following searches using the same search timeframe as for the custodial searches:⁴
 - OIP conducted a search for all correspondence with USA Brady, without keyword search modifiers, locating no responsive results.
 - OIP conducted a keyword search for “Giuliani.” One responsive record was located pursuant to this search. This responsive record was a duplicate of a record located in the custodial search described above.
 - OIP conducted a keyword search for all records containing the term “intake process” dating from November 1, 2019. Four responsive records were located pursuant to this search, three of which were duplicative of records located in the custodial search described above.
- In the course of preparing this search summary and explanation of withholdings, OIP identified fifteen pages of records located by the above-described searches that were incorrectly marked as non-responsive due to user error. Upon identifying these fifteen pages, OIP processed them and provided a supplemental response to Plaintiff.
- OIP’s search was reasonably calculated to uncover all potentially responsive records and all files likely to contain relevant documents were searched. In sum, these searches returned fifty-three pages containing material responsive to the requests. Fifteen of these pages originated with the Executive Office for United States Attorneys (EOUSA), and OIP referred these pages to EOUSA for further processing.

⁴ The data elements entered into the DES include such items as the date of the document, the date of receipt, the sender, the recipient, as well as a description of the subject of the record. searches of the DES may then be conducted by utilizing a single search parameter or combinations of search parameters. Search parameters may include the subject, organization, date, correspondent name, or keyword.

Explanation of Withholdings

- OIP reviewed all material located by both its electronic records search as well as its search of the DES, processed all responsive records, and released all responsive, non-exempt material to Plaintiff. OIP withheld records and excerpts of records pursuant to Exemptions 5 and 6.
- Exemption 5: Inter- or Intra-Agency Communications
 - OIP asserted Exemption 5 over twelve pages in full and two pages in part (corresponding to Document ID: 0.7.2967.8974 & 0.7.2967.8985).
 - Exemption 5 of the FOIA pertains to certain categories of privileged inter- or intra-agency communications. Here, records were withheld pursuant to the deliberative process privilege, which protects communications which are both pre-decisional and deliberative.
 - The twelve pages withheld in full under Exemption 5 consist of six iterations of a draft letter to Congress. OIP provided the final letter that corresponds to these drafts on pages seventeen and eighteen of its April 29, 2021 interim release. The working drafts were circulated only within the Executive Branch. and these drafts include proposals and suggestions and contain substantive, material differences from the final signed letter, including textual additions and deletions.
 - Document ID: 0.7.2967.8974, withheld in part under Exemption 5, and located on page seven of the April 29, 2021 interim release, relates to internal DOJ discussions connected to remarks made during an interview by Senator Lindsey Graham regarding the Department's activities concerning Ukraine, in anticipation of potential inquiries to the Department that the Senator's remarks might generate. Specifically, the withheld information includes characterizations of the Senator's remarks as well as opinions on how it may be understood. This information is pre-decisional because it preceded any final, public DOJ response to future media, or other, inquiries. This information is deliberative because it reflects a DOJ-internal press strategy discussion regarding the Senator's remarks. Specifically, it reflects an official's attempt to properly characterize relevant information on a sensitive matter to inform agency decision-makers in furtherance of potential inquiries regarding the remarks. Release of this information would cause DOJ officials to become more circumspect when voicing their opinions, diminishing the candor necessary for efficient decision-making. Thus, there is reasonably foreseeable harm in the release of this information as Department officials would temper their discussions with an eye towards eventual publication of their deliberations, instead of focusing on providing analysis, perspective, recommendations, and guidance to others in the Department.
 - Document ID: 0.7.2967.8985, withheld in part under Exemption 5, and located on page 2 of the December 03, 2021 supplemental release, relates to internal DOJ discussions connected to responding to Representative Nadler's February 10, 2020 letter. The withheld information is pre-decisional because it precedes the

final decisions that the Department made with respect to responding to this particular letter. This information is also deliberative because it includes a suggestion and alternative related to the response the Department issued on February 18, 2020 that is not reflected or incorporated in that response. Release of the specific information withheld in these records would harm the Department of Justice's ability to have robust internal deliberations regarding communications with the Legislative Branch as Department officials would temper their internal discussions out of concern for damaging their relationship with another branch of the government.

- Exemption 6: Personal Information
 - Exemption 6 of the FOIA pertains to information the release of which would constitute a clearly unwarranted invasion of the personal privacy of individuals. In determining whether to release or withhold information pursuant to Exemption 6, OIP balances the privacy interests of individuals identified in records against any "FOIA public interest" in disclosure of that information.
 - The information withheld in part under Exemption 6 in OIP's April 29, 2021 and December 03, 2021 responses, consist of personal contact information for federal officials. OIP limited its withholdings to mobile phone numbers and certain email addresses. Release of this information could subject these individuals to unwarranted attention and communications from the press and the general public, as well as potential harassment, which gives rise to a significant privacy interest. In assessing whether there is a FOIA public interest, OIP considered the mission and role of the Department and determined that releasing this information would in no way enhance the public's understanding of how the Department carries out its duties.

From: Rabbitt, Brian (OAG) <(b) (6)>
To: Greer, Megan L. (OLA) <(b) (6)>
Cc: Boyd, Stephen E. (OLA) <(b) (6)>
Bcc:
Subject: RE: Draft Letter re Ukraine Process
Date: Tue Feb 18 2020 09:45:55 EST
Attachments: DRAFT HJC Response re Ukraine Information 2.18.docx

Minor edits attached. Megan please prep for Stephen's signature.

From: Greer, Megan L. (OLA) <(b) (6)>
Sent: Tuesday, February 18, 2020 9:19 AM
To: Rabbitt, Brian (OAG) <(b) (6)>
Cc: Boyd, Stephen E. (OLA) <(b) (6)>
Subject: RE: Draft Letter re Ukraine Process

Brian,

The current draft, which includes the edits from the DAG, is attached (in red line and clean). Please let us know if you have any changes, and we can finalize and get it out this morning.

Thanks,

Megan

From: Rabbitt, Brian (OAG) <(b) (6)>
Sent: Tuesday, February 18, 2020 8:52 AM
To: Boyd, Stephen E. (OLA) <(b) (6)>
Cc: Greer, Megan L. (OLA) <(b) (6)>
Subject: Re: Draft Letter re Ukraine Process

Can we move this forward? I'd like to see a draft.

Sent from my iPhone

On Feb 17, 2020, at 9:24 AM, Boyd, Stephen E. (OLA) (b) (6) wrote:

Rgr.

Sent from my iPhone

On Feb 17, 2020, at 9:04 AM, Rabbitt, Brian (OAG) (b) (6) wrote:

Tomorrow is likely fine but let's just touch base before we send.

Sent from my iPhone

On Feb 17, 2020, at 9:01 AM, Boyd, Stephen E. (OLA) (b) (6) > wrote:

FYI re: below - DAG had a couple of minor edits late Friday. We'll polish it up and send it out tomorrow, (b) (5).

Sent from my iPhone

On Feb 14, 2020, at 3:01 PM, Rabbitt, Brian (OAG) (b) (6) wrote:

Some edits attached. This reflects my understanding of the situation, so might want to run this by ODAG, too, as they have been the ones handling this.

From: Greer, Megan L. (OLA) (b) (6) >
Sent: Friday, February 14, 2020 12:43 PM
To: Rabbitt, Brian (OAG) (b) (6)
Cc: Boyd, Stephen E. (OLA) (b) (6)
Subject: Draft Letter re Ukraine Process

Brian,

Following up on your discussion with Stephen, attached is a first draft of a response to Chairman Nadler's request for information about Ukraine procedures. A copy of the incoming request and the DAG's memo are also attached for reference.

Best regards,

Megan

Megan L. Greer

Senior Counsel

Office of Legislative Affairs

U.S. Department of Justice

(b) (6) direct

(b) (6) mobile

<DRAFT HJC Response re Ukraine Information bcr.docx>

From: Boyd, Stephen E. (OLA)
(b) (6)
To: Greer, Megan L. (OLA)
(b) (6)
Cc: Rabbitt, Brian (OAG)
(b) (6)
Bcc: >
Subject: Re: Draft Letter re Ukraine Process
Date: Fri Feb 14 2020 13:48:51 EST
Attachments:

Ready to move on this whenever people feel comfortable with it.

Sent from my iPhone

On Feb 14, 2020, at 12:42 PM, Greer, Megan L. (OLA) (b) (6) v> wrote:

Duplicative

ROBERT P. CASEY, JR.
PENNSYLVANIA

COMMITTEES:
AGRICULTURE, NUTRITION,
AND FORESTRY
FINANCE
HEALTH, EDUCATION,
LABOR, AND PENSIONS
SPECIAL COMMITTEE ON AGING

United States Senate

WASHINGTON, DC 20510

February 24, 2020

The Honorable William Barr
Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530

Dear Attorney General Barr:

I write to express my serious concern regarding the Department of Justice (DOJ) establishing a special “intake process” in the Western District of Pennsylvania to review information related to Ukraine, including Russian propaganda that continues to be peddled by the President Trump’s personal lawyer, Rudy Giuliani. This new process has led me to question whether DOJ’s leadership is more committed to serving the President’s political agenda than the American people—particularly my constituents in the Western District of Pennsylvania.

On Sunday, February 9, Senator Lindsay Graham indicated that the DOJ had established an intake “process” for Mr. Giuliani to submit information related to Ukraine.¹ The following day, you confirmed that you had created an “intake process in the field” for the DOJ to receive information from Mr. Giuliani.² On Tuesday, February 18, the DOJ confirmed that the U.S. Attorney in the Western District of Pennsylvania, Scott Brady, was serving as the conduit for this information.³ The Department claims that it “regularly assigns U.S. Attorneys to coordinate or focus on certain matters” and that this new intake process does not “grant any individual unique access to the Department.”⁴ Nevertheless, I am very concerned that the DOJ is diverting essential law enforcement resources away from urgent public safety concerns in the Western District of Pennsylvania in order to accept and review “information” that is Russian propaganda and political smears against the President’s political rivals.

As you know, Mr. Giuliani has repeatedly pushed Ukraine to announce investigations into former Vice President Joe Biden and the debunked theory alleging Ukrainian election

¹ Transcript: Lindsey Graham on “Face the Nation,” February 9, 2020, CBS NEWS (Feb. 9, 2020 11:40 AM), <https://www.cbsnews.com/news/lindsey-graham-ukraine-bidens-rudy-giuliani-face-the-nation-2020-02-09/>.

² Matt Zapotosky & Devlin Barrett, *Barr Acknowledges Justice Dept. Has Created ‘Intake Process’ To Vet Giuliani’s Information On Bidens*, WASH. POST (Feb. 10, 2020, 5:58 PM), https://www.washingtonpost.com/national-security/barr-acknowledges-justice-dept-has-created-intake-process-to-vet-giulianis-information-on-bidens/2020/02/10/0fba553a-4c1e-11ea-bf44-f5043eb3918a_story.html.

³ Letter from Stephen E. Boyd, Asst. Att’y Gen., to Chairman Jerrold Nadler, U.S. House of Representatives, Committee on the Judiciary (Feb. 18, 2020), <https://www.axios.com/justice-department-ukraine-giuliani-us-attorneys-639258e4-44ba-41e2-be1e-f59b65c51852.html>.

⁴ *Id.*

interference in 2016.⁵ In 2019, FBI Director Christopher Wray confirmed that the FBI had “no information that indicates that Ukraine interfered with the 2016 presidential election.”⁶ Furthermore, Dr. Fiona Hill, former Senior Director of European and Russian Affairs at the National Security Council, explained that this conspiracy theory was “a fictional narrative that is being perpetrated and propagated by the Russian security services themselves” to damage relations between Ukraine and the United States and protect Russia’s own interests.⁷ Any materials related to these claims should be rejected outright by the DOJ. Law enforcement resources in Western Pennsylvania should not be diverted from combatting serious safety issues to vetting Russian propaganda from Mr. Giuliani.

For example, studies have indicated that Pennsylvania is one of three states with the highest rates of death due to drug overdose, largely fueled by the opioid epidemic plaguing too many of our communities.⁸ In addition to the staggering loss of life, Pennsylvania’s Auditor General has reported that the opioid crisis has cost Pennsylvania taxpayers approximately \$25 billion annually.⁹ This crisis has hit Western Pennsylvania particularly hard—even being described as “Ground Zero” for the opioid epidemic by U.S. Attorney Brady.¹⁰ In 2017, Allegheny County experienced a record-breaking high of 737 overdose deaths.¹¹ Fentanyl was involved in approximately 74% of those deaths.¹²

In recent years, however, we have seen progress in reducing opioid deaths in Western Pennsylvania. In November 2019, U.S. Attorney Brady announced that overdose deaths decreased by 37% throughout all 25 counties in the Western District.¹³ In some of the most impacted counties, including Beaver, Butler, Lawrence, Allegheny, Washington and Westmoreland Counties, fentanyl-related overdoses decreased from 565 in 2018 to 460 in 2019.¹⁴ A number of measures have slowed this crisis, including increased access to naloxone, doctors prescribing fewer opioids, implementing medication-assisted drug treatments and

⁵ Kyle Cheney, “Of Course I Did”: Giuliani Acknowledges Asking Ukraine to Investigate Biden, POLITICO (Sept. 19, 2019, 11:59 PM), <https://www.politico.com/story/2019/09/19/giuliani-biden-ukraine-trump-1506009>.

⁶ Luke Barr & Alexander Mallin, *FBI Director Pushes Back On Debunked Conspiracy Theory About 2016 Election Interference*, ABC NEWS (Dec. 9, 2019 6:03 PM), <https://abcnews.go.com/Politics/fbi-director-pushes-back-debunked-conspiracy-theory-2016/story?id=67609244>.

⁷ H.R. Doc. No. 116-95, Vol. III, at 5188 (2020).

⁸ *Drug Overdose Deaths*, CTRS. FOR DISEASE CONTROL & PREVENTION, <https://www.cdc.gov/drugoverdose/data/statedeaths.html> (last visited Feb. 21, 2020).

⁹ EUGENE A. DePASQUALE, PA. AUDITOR GEN., *A DEADLY DOSE: FENTANYL’S IMPACT IN PENNSYLVANIA I* (Oct. 16, 2019), https://www.paauditor.gov/Media/Default/Reports/RPT_Fentanyl_101619_FINAL.pdf.

¹⁰ Press Release, U.S. Att’y’s Office, W. Dist. Of Pa., U.S. Attorney Brady: Western Pennsylvania’s Response to the Opioid Epidemic Resulted in a Dramatic Decrease in Overdose Deaths in 2018 (Mar. 8, 2019), <https://www.justice.gov/usao-wdpa/pr/us-attorney-brady-western-pennsylvania-s-response-opioid-epidemic-resulted-dramatic>.

¹¹ Aubrey Whelan, *Drug Overdose Deaths Dropped 40% Last Year in the Pittsburgh Area. Why Can’t Philadelphia Do the Same?*, PHILA. INQUIRER (Dec. 9, 2019), <https://www.inquirer.com/health/opioid-addiction/opioid-overdoses-philadelphia-pittsburgh-naloxone-20191209.html>.

¹² *View County Death Data*, OVERDOSEFREEPA, <https://www.overdosefreepa.pitt.edu/know-the-facts/view-overdose-death-data/> (last visited Feb. 21, 2020).

¹³ Press Release, U.S. Att’y’s Office, W. Dist. Of Pa., U.S. Attorney Brady Announces Record Number of Prosecutions for Western District of Pennsylvania (Nov. 1, 2019), <https://www.justice.gov/usao-wdpa/pr/us-attorney-brady-announces-record-number-prosecutions-western-district-pennsylvania>.

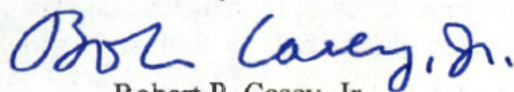
¹⁴ *View County Death Data*, *supra* note 12.

targeted law enforcement.¹⁵ For example, I was proud to support the leaders in Southwestern Pennsylvania in their efforts to have the White House designate Allegheny, Beaver and Washington Counties as a High Intensity Drug Trafficking Area.¹⁶ This designation has not only provided eligibility for federal grants to help law enforcement limit the flow of illicit drugs into, out of and within Southwestern Pennsylvania, but it has also ensured collaboration and information-sharing among stakeholders at all levels of government.

Community leaders in Western Pennsylvania, including the United States Attorney's Office, should be applauded for their efforts to reduce the opioid epidemic in the region. Unfortunately, it is clear that as Western Pennsylvania has tried to close the door on the opioid crisis, more doors have opened for other types of illicit drug use and drug trafficking. Just recently, U.S. Attorney Brady commented on the need to fight the "fourth wave" of the crisis after identifying an increase in incidents in Western Pennsylvania involving cocaine, crack and methamphetamine.¹⁷

Given these concerns, I urge you to take immediate steps to ensure that the DOJ does not continue diverting law enforcement resources away from the important law enforcement priorities in the Western District of Pennsylvania.

Sincerely,



Robert P. Casey, Jr.
United States Senator

¹⁵ Whelan, *supra* note 11.

¹⁶ See Press Release, U.S. Att'y's Office, W. Dist. Of Pa., U.S. Attorney Brady Welcomes HIDTA Designation to Combat Drug Trafficking and Reduce Supply of Illegal Drugs (Sept. 24, 2018), <https://www.justice.gov/usao-wdpa/pr/us-attorney-brady-welcomes-hidta-designation-combat-drug-trafficking-and-reduce-supply>.

¹⁷ Chauncey Ross, *Region's Top Prosecutor Sees Fourth Wave of Drugs*, INDIANA GAZETTE (Jan. 18, 2020), https://www.indianagazette.com/news/region-s-top-prosecutor-sees-fourth-wave-of-drugs/article_1a3c3dd4-3a08-11ea-9f79-5f9a658ba9bb.html.