



U.S. Department of Veterans Affairs
Office of General Counsel
Information and Administrative Law Group

810 Vermont Avenue NW
Washington DC 20420
www.va.gov/ogc

In Reply Refer To: ILG/024N
OGC Case # 147559
FOIA Request # 20-05139F

July 8, 2020

Austin Evers
Executive Director
American Oversight
1030 15th Street, NW
Suite B255
Washington, DC 20005

Dear Mr. Evers:

This letter is the final administrative decision under the Freedom of Information Act (FOIA), 5 U.S.C. § 552, concerning your June 9, 2020, emailed appeal.

Procedural History

Initial Request By letter dated March 5, 2020, you submitted a FOIA request to the Department of Veterans Affairs (VA) Central Office FOIA Service, requesting the following:

All email communications (including emails, complete email chains, email attachments, calendar invitations, and calendar invitation attachments) between (a) Secretary Robert Wilkie or anyone serving as White House Liaison or agency point of contact for the coronavirus task force, and (b) the Executive Office of the President (EOP) officials listed below:

- i. Vice President Mike Pence
- i. National Security Advisor Robert O'Brien
- iii. Assistant to the President and Deputy National Security Advisor Matthew Pottinger
- iv. Assistant to the President and Senior Advisor to the Chief of Staff Robert Blair
- v. Assistant to the President and Director of the Domestic Policy Council Joseph Grogan

2.

Austin Evers

- vi. Assistant to the President and Deputy Chief of Staff for Policy Coordination Christopher Liddell
- vii. Director of the National Economic Council Larry Kudlow
- viii. White House Coronavirus Response Coordinator Deborah Birx
- ix. Press Secretary Katie Miller (formerly Katie Waldman)
- x. Director of the White House Office of Science and Technology Policy Kelvin Droegmeier

Initial Agency Decision On May 27, 2020, Richard Ha, FOIA Officer, Office of the Secretary, provided 71 pages of responsive material in redacted form; in an accompanying letter, he explained that material was redacted pursuant to the presidential communications and the deliberative process privileges within Exemption 5 and under Exemption 6 (5 U.S.C. §§ 552(b)(5),(b)(6)).

Fees The assessment of fees is not an issue for resolution in this case.

Appeal In your appeal, you argue that the redacted material based upon FOIA Exemption 5 was improper. First, you assert that the responsive records reveal that they were shared with Congress; you argue that because Congress is not an agency under the FOIA, the records do not meet the threshold requirement of FOIA Exemption 5 that the records are “inter-agency” records. Next, you argue that information in the responsive records may not be redacted under the “consultant corollary” theory, which protects information generated in the course of an agency’s relationship with a consultant. In this regard, you assert that members of Congress or their staff are not neutral parties, given that Congress was in the midst of addressing the coronavirus pandemic response bill; you also note that a suggestion that members of Congress or their staff are acting akin to neutral agency employees conflicts with the congressional prohibition against members of either house of Congress serving as officers of the United States contained in the Incompatibility clause of the Constitution. Further, you assert that the presidential communications privilege protects only communications that the president believes should remain confidential and only to the extent they are with his immediate advisers and their staff. In this regard, you again point out that members of Congress or their staffs cannot serve both Congress and the president, and that the documents, accordingly, are not protected by the presidential communications privilege.

With regard to the application of Exemption 6, you find it “doubtful” that members of Congress or their staff have a privacy interest in their email addresses; you also argue that members of Congress or their staff do not have a privacy interest in their names as they communicate with the executive branch regarding a matter of grave national concern and that even if they did maintain a privacy interest, it is

3.

Austin Evers

outweighed by the public interest. You conclude that within the records and information withheld, VA should release the names and or emails of the individuals communicating with "mail.house.gov" email addresses in the records at issue. Based on the narrow focus of your appeal regarding the withholdings under Exemption 6, we are limiting our consideration of that exemption to the individuals associated with "mail.house.gov" email addresses.

Relevant Law

The FOIA provides that federal agencies must disclose records requested unless they may be withheld in accordance with one or more of nine statutory exemptions. 5 U.S.C. § 552(b).

FOIA Exemption 5 protects communications among the President and his advisers; the privilege applies to the documents in their entirety and applies to both pre-decisional and post-decisional material. The privilege applies to documents solicited and received by the President or his immediate White House advisers who have "broad and significant responsibility for investigating and formulating the advice to be given to the President." Judicial Watch, Inc. v. DOJ, 365 F. 3d 1108 (D.C. Cir. 2004). See also In re Sealed Case, 121 F. 3d 729 (D.C.Cir. 1997).

FOIA Exemption 5 also protects "inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than an agency in litigation with the agency." 5 U.S.C. § 552(b)(5). Exemption 5 encompasses statutory privileges and those commonly recognized by case law. United States v. Weber Aircraft Corp., 465 U.S. 792, 800 (1984). Exemption 5 applies to an inter- or intra-agency record, including information generated by an outside expert. Dep't of the Interior v Klamath Water Users Protective Ass'n, 532 U.S. 1 (2001).

FOIA Exemption 5 privileges include the deliberative process privilege, the general purpose of which is to "prevent injury to the quality of agency decisions." NLRB v. Sears, Roebuck & Co., 421 U.S. 132, 151 (1975). Three policy purposes have been held to constitute the bases for this privilege: (1) to encourage open, frank discussions on matters of policy between subordinates and superiors; (2) to protect against premature disclosure of proposed policies before they are actually adopted; and (3) to protect against public confusion that might result from disclosure of reasons and rationales that were not in fact ultimately the grounds for an agency's action. Russell v. Dep't of the Air Force, 682 F.2d 1045, 1048 (D.C. Cir. 1982). The deliberative process privilege is designed to protect the "decision making processes of

4.

Austin Evers

government agencies.” Sears, 421 U.S. at 150. This privilege protects not merely documents, but the integrity of the deliberative process itself where the exposure of that process would result in harm.

Two requirements must be met to invoke the deliberative process privilege: first, the record must be pre-decisional, i.e., antecedent to the adoption of agency policy. Ancient Coin Collector's Guild v. U.S. Dep't. of State, 641 F.3d 504 (D.C. Cir. 2011). Second, the document must be deliberative in that it makes recommendations or expresses opinions on legal or policy matters and are related to the process by which agency policy is formulated; it must be part of the agency's deliberative process by which the decision itself is made. Vaughn v. Rosen, 523 F. 2d 1136 (D.C. Cir. 1975); Brennan Ctr. for Justice at New York Univ. Sch. Of Law v. DOJ, 697 F. 3d 184 (2d Cir. 2012).

FOIA Exemption 6 covers “personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy.” 5 U.S.C. § 552(b)(6). In United States Department of Justice v. Reporters Committee for Freedom of the Press, 489 U.S. 749 (1989), the Supreme Court provided the following step-by-step analysis to determine when the exemptions apply to a case: (1) determine whether a personal privacy interest is involved; (2) determine whether disclosure would serve the public interest; and (3) balance the personal privacy interest against the public interest.

Analysis

At the outset, we point out that 41 pages that were withheld at the initial level are being released in full on appeal; one additional page is being released in part. The pages are enclosed.

The documents identified as responsive to your FOIA request contain information that falls within the protection of Exemption 5. First, the documents represent intra-agency memoranda, and thus meet the exemption's threshold requirement. We acknowledge your observation that the email addresses to which the responsive material was sent included two “mail.house.gov” email addresses, which you argue prohibits the application of Exemption 5 to the material. We have researched this issue, and we conclude otherwise. We have learned that the email addresses were assigned to individuals on the White House staff who were functioning as White House employees on or before March 21, 2020, the date their names first appear as email recipients; these individuals were not functioning as both congressional and White house staff. The sender's intent in including these email

5.

Austin Evers

addresses was to provide the information to White House staff, not congressional staff, and presuming receipt, the information was received by the individuals in their capacity as White House staff. Accordingly, the email was not distributed outside of the executive branch. Lastly, we note that the email addresses as written are currently invalid, and it is unclear whether they were valid at the time they were included in the task force recipient addresses. Even if they were valid at that time and were received, however, the status of the individuals as White House staff renders this consideration immaterial. In light of the foregoing, we conclude that the inclusion of the email addresses does not preclude the application of Exemption 5.

With regard to the withheld information in this case, we conclude that the material is protected in part under the presidential communications privilege under FOIA Exemption 5. The documents consist of communications among task force members functioning as advisers to the President regarding the assessment and handling of the coronavirus outbreak. The withheld pages reflect options and plans to address the virus and handle its spread; the task force designed possible responses based on the course of the virus and consideration of relevant factors. The information withheld also includes discussions within VA and between VA and the task force regarding issues such as the availability of beds in a VA facility. Overall, the withheld information represents officials' analyses of the situation and their thoughts and recommendations regarding potential scenarios and responses to the pandemic; the material reflects the advice and guidance compiled by presidential advisers to inform the judgment of the government on the effective management of the coronavirus. Accordingly, the information is protected under the presidential communications privilege.

Within FOIA Exemption 5, VA also may withhold a document or information contained within a document under the deliberative process privilege, which, as noted above, is designed to protect the decision-making processes within federal agencies. Sears, 421 U.S. at 150. Overall, the deliberative process privilege supports an agency's ability to encourage open, frank discussions on matters of policy between subordinates and superiors, to protect against premature disclosure of proposed policies before they are actually adopted, and to protect against public confusion that might result from disclosure of reasons and rationales that were not in fact the grounds for an agency's ultimate action. Exemption 5 protects the agency's decision-making process and the integrity of the deliberative process itself. Further, as a matter of Federal policy, the agency must state an articulable, foreseeable harm to the agency or its activities that could occur as a result of release of the document or information.

6.

Austin Evers

We note that the responsive records in this case were created by a task force designed to assist and advise the President, and qualify as an intra-agency memorandum under the deliberative process privilege. The email exchanges and analyses being withheld in this case were prepared antecedent to the adoption of policy; the very nature of the documents is to provide information to be considered by the task force members to assess relevant factors and weigh options to address the coronavirus pandemic. The material is thus pre-decisional in it serves to inform the options available to the President and his advisers as they evaluated how to proceed in addressing the pandemic.

The material also is deliberative insofar as it relates to the process by which policy was formulated to combat the coronavirus; the documents represent the task force's ongoing consideration of various factors regarding the virus generally and options available to contain its spread. The emails and attachments being withheld contain the thoughts, opinions, and recommendations of those responsible for studying the pandemic and potential responses. Release of this information would cause injury to the deliberative process. In evaluating the harm to the deliberative process, we must consider the context in which the documents are used. Wolfe v. Department of Health and Human Services, 839 F. 2d 768 (D.C. Cir. 1988). In this case, release of deliberations may disclose information upon which recommendations on proposed policies may or may not be made or adopted; such a release would foster potentially erroneous conclusions and create public confusion from disclosure of information that ultimately, may not be or may not have been the grounds for the government's action. Further, given the continued presence of the pandemic in the United States and the continued relevance of the task force, the deliberations in the withheld records may have continued significance to an ongoing analysis of the coronavirus and the government's response.

The responsive records also include information protected under Exemption 6. Note that the meaning of a personnel file is construed to include a file that applies to a "particular individual." United States Department of State v. Washington Post Co., 456 U.S. 595 (1982). As addressed above, you only appeal application of Exemption 6 to the names associated with the "mail.house.gov" email addresses. In this case, the records contain the names of employees associated with the task force's review of the coronavirus; we conclude that the record represents a personnel file and meets the threshold requirement in this case. Further, we conclude that individuals associated with the task force have a significant privacy interest in being named or otherwise associated with the ongoing events in this case. The individuals have a significant interest in their identities and their association with task force activity. We stress that career public servants retain personal privacy interests in the discharge of their public duties. Further, they retain a privacy interest in statements that are made

7.

Austin Evers

in the course of the investigation; release of their identities could result in harassment of these individuals themselves. Wilson v. Dep't of Transp., 730 F. Supp. 2d 140 (D.D.C. 2010). In this case, the employees have an interest in being protected against the risk of annoyance and harassment or other potential repercussions, such as negative reactions to their participation.

An analysis regarding disclosure of information under exemption (b)(6) also includes consideration of whether disclosure would serve the public interest. As noted in Reporter's Committee, we must balance the personal privacy interest against the public interest. In evaluating the public interest, we focus on the nature of the requested documents and their relationship to the public interest generally. We must consider whether disclosure of the requested information, or portions thereof that have been withheld, would "open agency action to the light of public scrutiny" rather than focus on the particular purpose for which the document is being requested. Reporter's Committee, 489 U.S. at 772.

We find no evidence that the names withheld would serve an articulable and significant public interest, and you have not identified a public interest in the individuals identified in the records that would outweigh their privacy interest. We find no connection between public interest, or shedding light on government activity, and the identities of these individuals associated with task force.

Conclusion The responsive documents addressed in this decision were properly withheld under FOIA Exemptions 5 and 6; aside from the documents being released with this decision, we affirm the determination of the Office of the Secretary and deny your appeal.

Mediation and Appeal Rights

This final agency decision concludes the administrative processing of your requests referred to above. As part of the 2007 FOIA amendments, the Office of Government Information Services (OGIS) was created to offer mediation services. Similarly, as part of the FOIA Improvement Act of 2016, VA established a FOIA Public Liaison to offer mediation services. Both OGIS and the VA Public Liaison will assist in resolving disputes between FOIA requesters and VA as a non-exclusive alternative to litigation. Using OGIS or the VA FOIA Public Liaison does not affect your right to pursue litigation. You may contact OGIS or the VA Public Liaison in any of the following ways:

8.

Austin Evers

Office of Government Information Services
National Archives and Records Administration
Room 2510
8601 Adelphi Road
College Park, MD 20740-6001

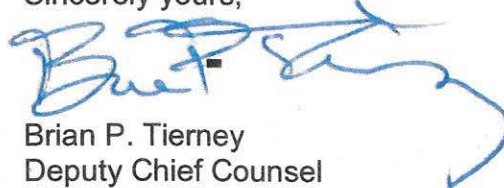
E-mail: ogis@nara.gov
Telephone: 202741-5770
Facsimile: 202-741-5769
Toll-free: 877-684-6448

VA FOIA Public Liaison:
Doloras Johnson
Director, VA FOIA Service
810 Vermont Avenue, NW (005R1C)
Washington, DC 20420

E-mail: vacofoiaservice@va.gov
Telephone: 877-750-3642
Facsimile: 202-632-7581

With respect to any information denied to you by this final agency decision, the FOIA requires us to advise you that if you believe the Department erred in this decision, you have the right to file a complaint in an appropriate United States District Court.

Sincerely yours,



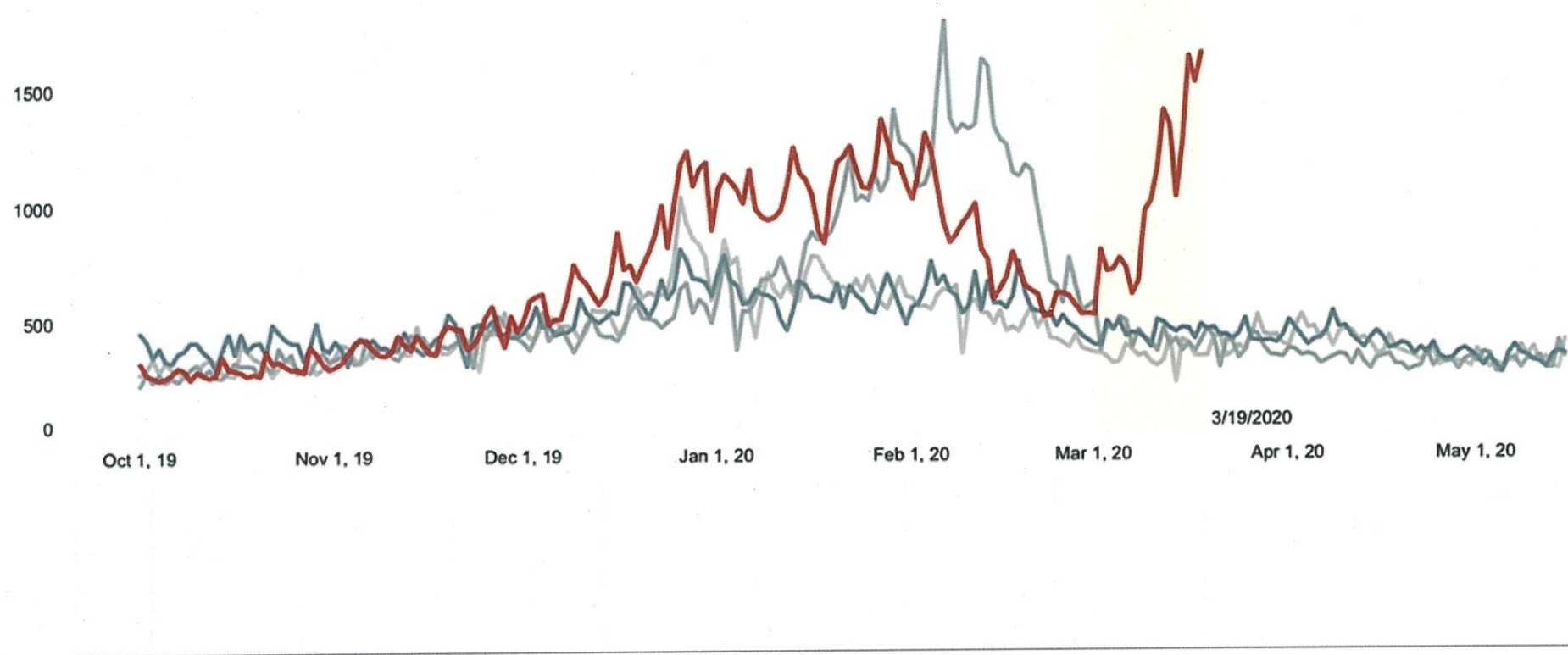
Brian P. Tierney
Deputy Chief Counsel
Information & Administrative Law Group

cc: Richard Ha (001B)
Doloras Johnson – Director, VA FOIA Service
Michael Sarich-VHA FOIA Officer

Enclosure 42 pages

Flu Surveillance – can see early change around 7-8 March in ILI at ER in NYC

Daily Influenza-like Illness + Pneumonia Visits to NYC Emergency Departments: 2016-2020

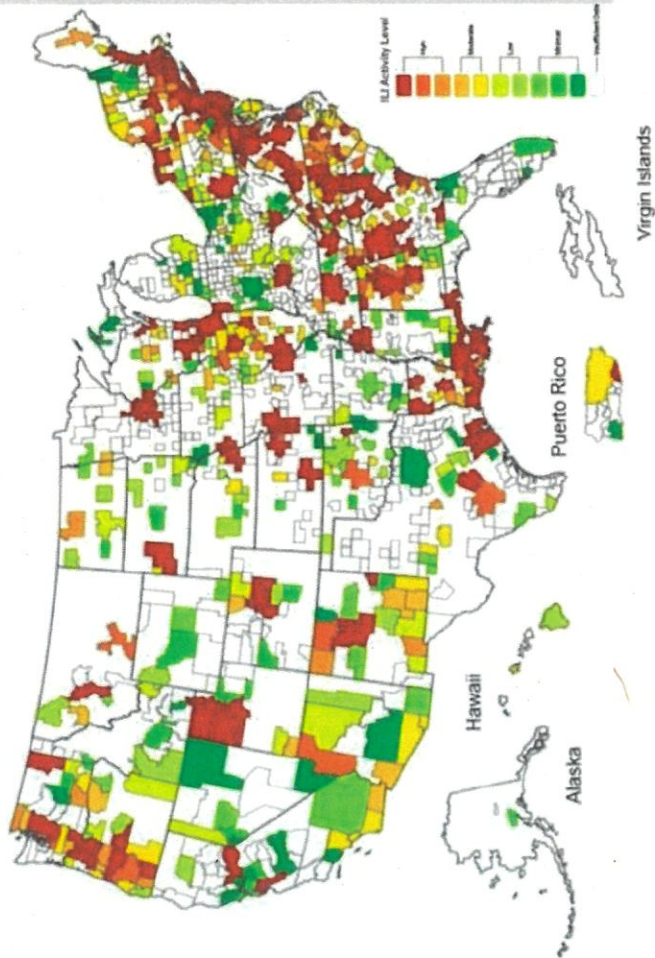


Flu activity and COVID19 activity.

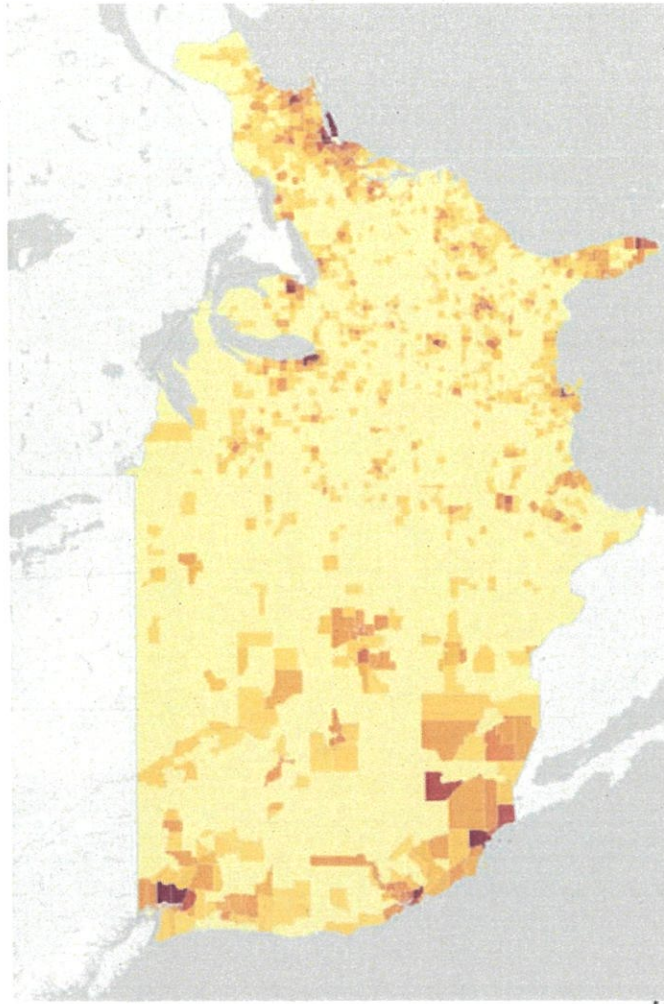
(b) (5)

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FLU Surveillance



COVID 19 Surveillance



COVID-19 case data – Task Force

22 March

Data as of March 21, 2020

Global data from 21 March and 22 March 0.00 GMT

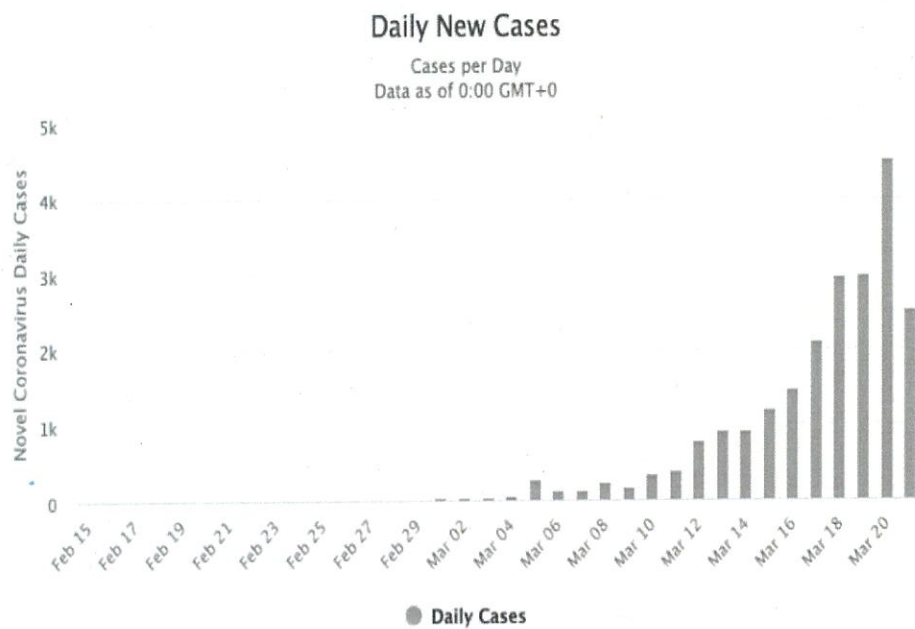
Country, Other	Total Cases	New Cases	Total Deaths	New Deaths	Total Recovered	Active Cases	Serious, Critical	Tot Cases/ 1M pop
China	81,008	+41	3,255	+7	71,740	6,013	1,927	56
Italy	53,578	+6,557	4,825	+793	6,072	42,681	2,857	886
Spain	25,496	+3,925	1,381	+288	2,125	21,990	1,612	545
USA	24,207	+4,824	302	+46	176	23,729	637	73
Germany	22,364	+2,516	84	+16	209	22,071	2	267
Iran	20,610	+966	1,556	+123	7,635	11,419		245
France	14,459	+1,847	562	+112	1,587	12,310	1,525	222
S. Korea	8,799	+147	102	+8	2,612	6,085	59	172
Switzerland	6,863	+1,248	80	+24	131	6,652	141	793
UK	5,018	+1,035	233	+56	93	4,692	20	74
Netherlands	3,631	+637	136	+30	2	3,493	354	212
Austria	2,992	+343	8	+2	9	2,975	15	332
Belgium	2,815	+558	67	+30	263	2,485	288	243
Norway	2,164	+205	7		6	2,151	28	399
Sweden	1,770	+131	20	+4	16	1,734	71	175

Country, Other	Total Cases	New Cases	Total Deaths	New Deaths	Total Recovered	Active Cases	Serious, Critical	Tot Cases/ 1M pop
China	81,054	+46	3,261	+6	72,440	5,353	1,845	56
Italy	53,578		4,825		6,072	42,681	2,857	886
Spain	28,572	+3,076	1,725	+344	2,125	24,722	1,612	611
USA	26,900	+2,693	348	+46	178	26,374	708	81
Germany	23,129	+765	93	+9	209	22,827	2	276
Iran	21,638	+1,028	1,685	+129	7,635	12,318		258
France	14,459		562		1,587	12,310	1,525	222
S. Korea	8,897	+98	104	+2	2,909	5,884	59	174
Switzerland	7,225	+362	80		131	7,014	141	835
UK	5,018		233		93	4,692	20	74
Netherlands	3,631		136		2	3,493	354	212
Belgium	3,401	+586	75	+8	263	3,063	288	293
Austria	3,024	+32	8		9	3,007	15	336
Norway	2,226	+62	7		6	2,213	28	411
Sweden	1,770		20		16	1,734	71	175
			19		14	1,295	1	35

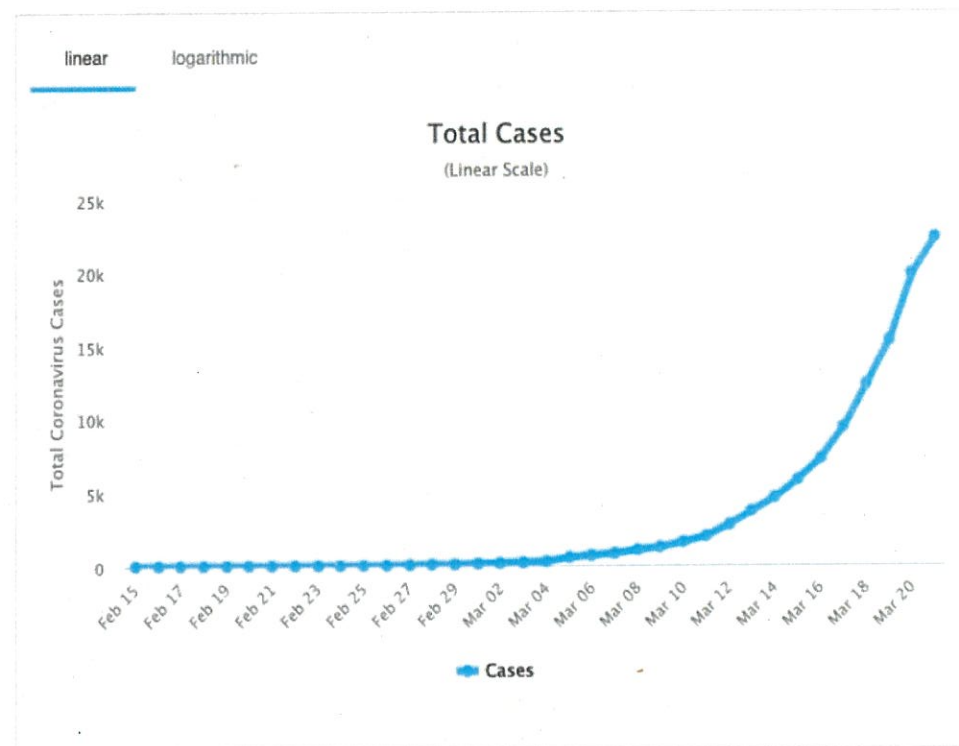
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Germany

Daily New Cases in Germany

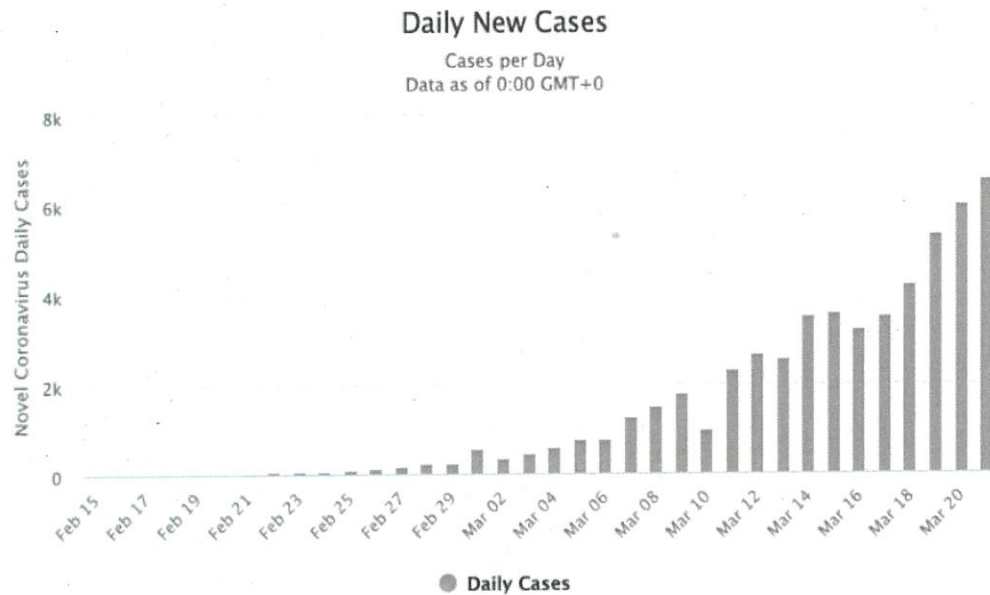


Total Coronavirus Cases in Germany

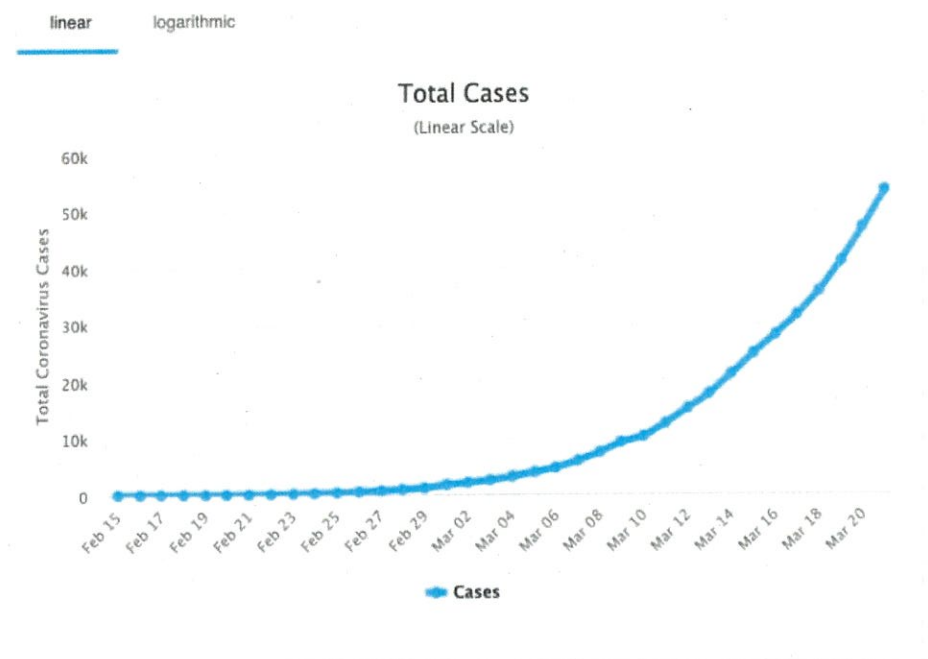


Italy

Daily New Cases in Italy

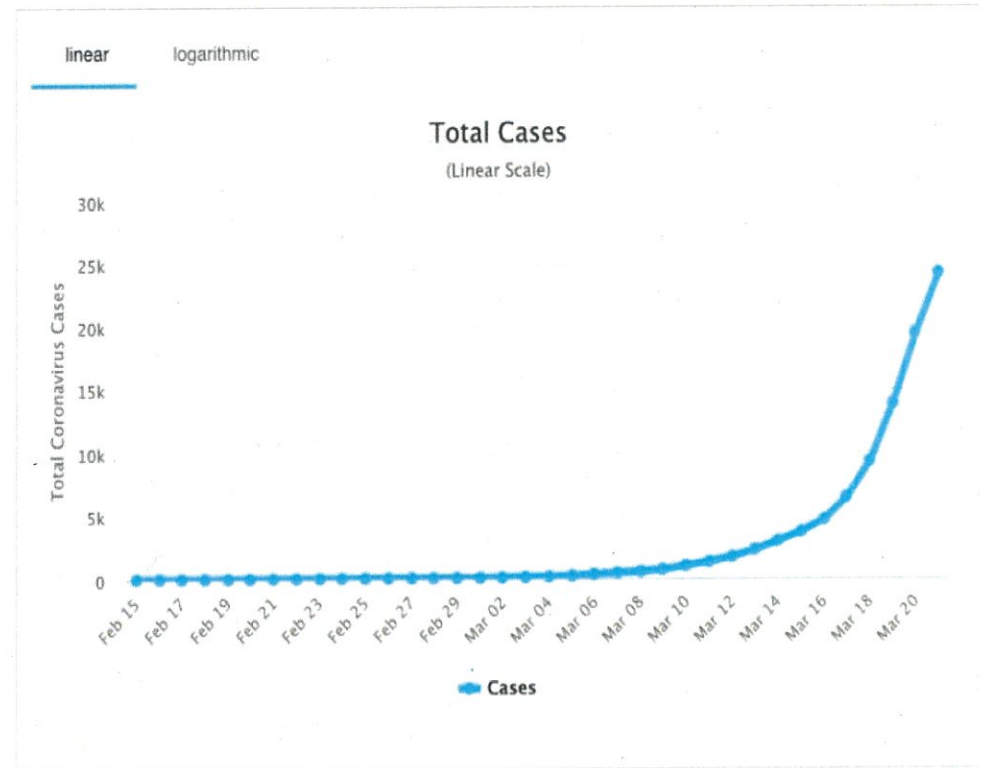


Total Coronavirus Cases in Italy



United States

Daily New Cases in the United States



United States 21 March and 22 March 0.00 GMT

USA State	Total Cases	New Cases	Total Deaths	New Deaths	Total Recovered	Active Cases
New York	10,372	+1,974	56	+10		10,316
Washington	1,793	+269	94	+11	124	1,575
California	1,391	+184	24	+1	6	1,361
New Jersey	1,327	+437	16	+5		1,311
Michigan	787	+235	5	+2		782
Illinois	753	+168	6	+1	2	745
Florida	659	+96	12	+1		647
Louisiana	585	+48	16	+2		569
Georgia	555	+70	14			541
Massachusetts	525	+112	1		1	523
Colorado	476	+113	5	+1		471
Texas	473	+79	5		4	464
Pennsylvania	391	+88	2	+1		389
Tennessee	371	+138	1	+1		370

USA State	Total Cases	New Cases	Total Deaths	New Deaths	Total Recovered	Active Cases
New York	12,324	+1,952	76	+20		12,248
Washington	1,793		94		124	1,575
California	1,519	+128	28	+4	6	1,485
New Jersey	1,327		16			1,311
Michigan	808	+21	8	+3		800
Louisiana	763	+178	20	+4		743
Florida	763	+104	13	+1		750
Illinois	753		6		2	745
Texas	559	+86	5		11	543
Georgia	555		20	+6		535
Massachusetts	529	+4	2	+1	1	526
Colorado	476		6	+1		470
Pennsylvania	405	+14	2			403
Tennessee	371		1			370

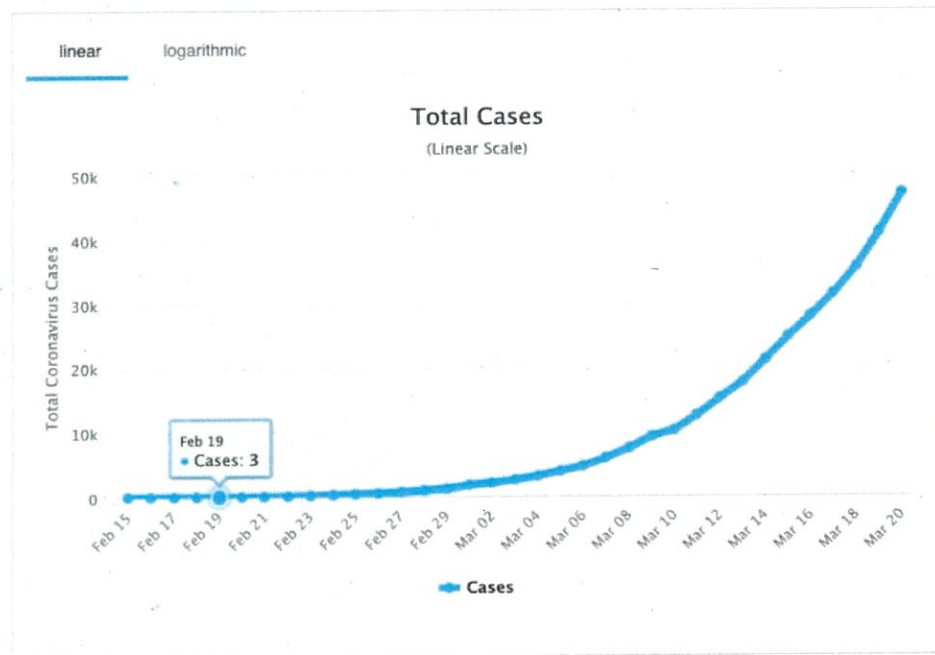
March 20 Data

Country, Other	Total Cases	New Cases	Total Deaths	New Deaths	Total Recovered	Active Cases	Serious, Critical	Tot Cases/ 1M pop
China	80,967	+39	3,248	+3	71,150	6,569	2,136	56
Italy	47,021	+5,986	4,032	+627	5,129	37,860	2,655	778
Spain	21,571	+3,494	1,093	+262	1,588	18,890	939	461
Germany	19,848	+4,528	68	+24	180	19,600	2	237
Iran	19,644	+1,237	1,433	+149	6,745	11,466		234
USA	19,383	+5,594	256	+49	147	18,980	64	59
France	12,612	+1,617	450	+78	1,587	10,575	1,297	193
S. Korea	8,652	+87	94	+3	2,233	6,325	59	169
Switzerland	5,615	+1,393	56	+13	15	5,544	141	649
UK	3,983	+714	177	+33	65	3,741	20	59
Netherlands	2,994	+534	106	+30	2	2,886	210	175
Austria	2,649	+470	6		9	2,634	14	294
Belgium	2,257	+462	37	+16	204	2,016	164	195
Norway	1,959	+169	7		1	1,951	27	361

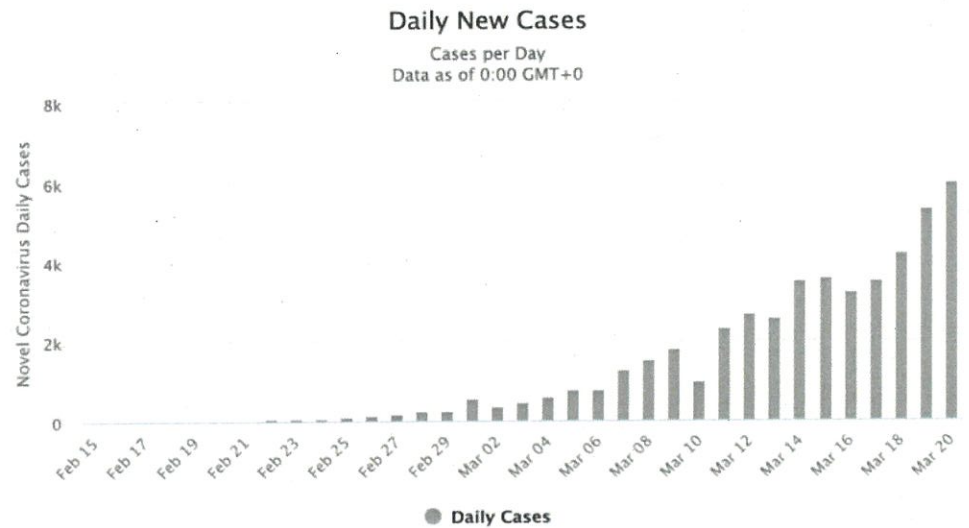
USA State	Total Cases	New Cases	Total Deaths	New Deaths	Total Recovered	Active Cases
New York	8,398	+3,031	46	+12		8,352
Washington	1,524	+148	83	+9	124	1,317
California	1,207	+198	23	+4	6	1,178
New Jersey	890	+148	11	+2		879
Illinois	585	+163	5	+1	2	578
Florida	563	+146	11	+2		552
Michigan	552	+216	3			549
Louisiana	537	+145	14	+4		523
Georgia	485	+198	14	+4		471
Massachusetts	413	+85	1	+1	1	411
Texas	394	+110	5		4	385
Colorado	363	+85	4			359
Pennsylvania	303	+96	1			302
Tennessee	233	+79				233
Wisconsin	210	+51	3	+3	1	206

March 20 data for Italy

Total Coronavirus Cases in Italy

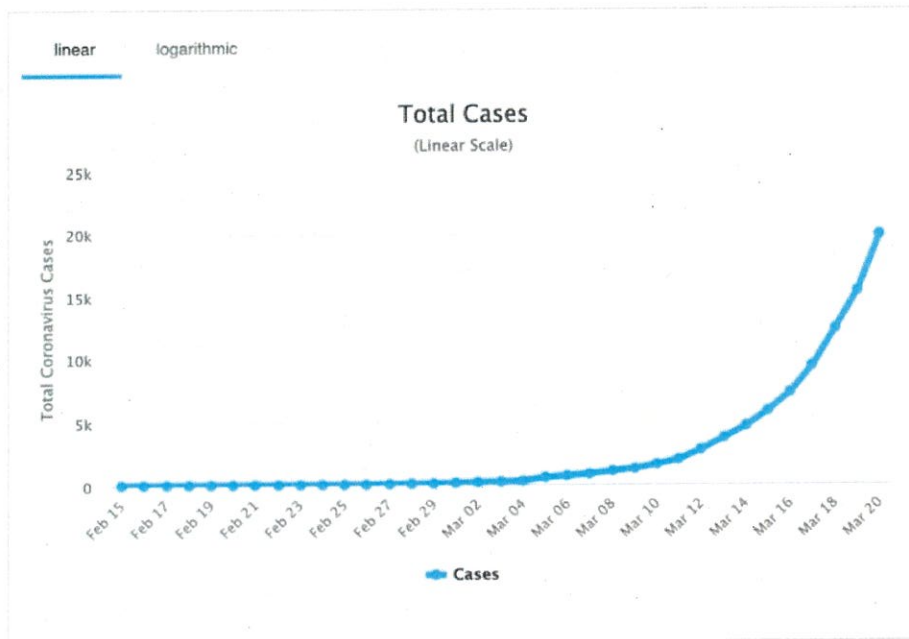


Daily New Cases in Italy

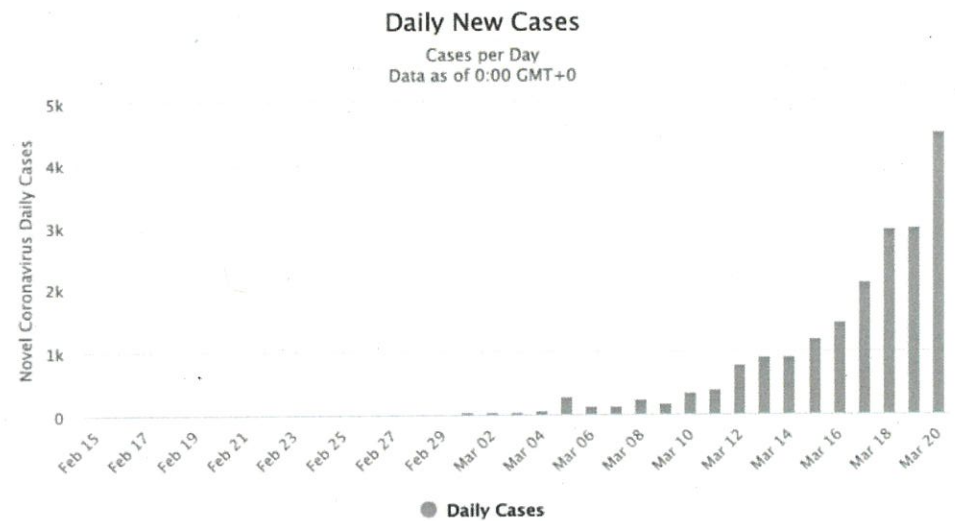


March 20 data for Germany

Total Coronavirus Cases in Germany

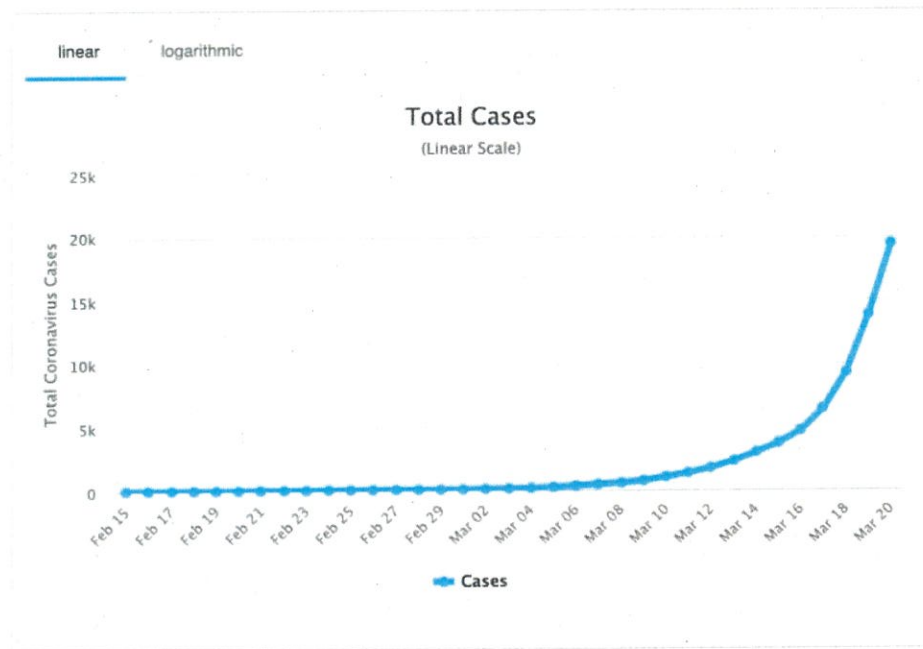


Daily New Cases in Germany

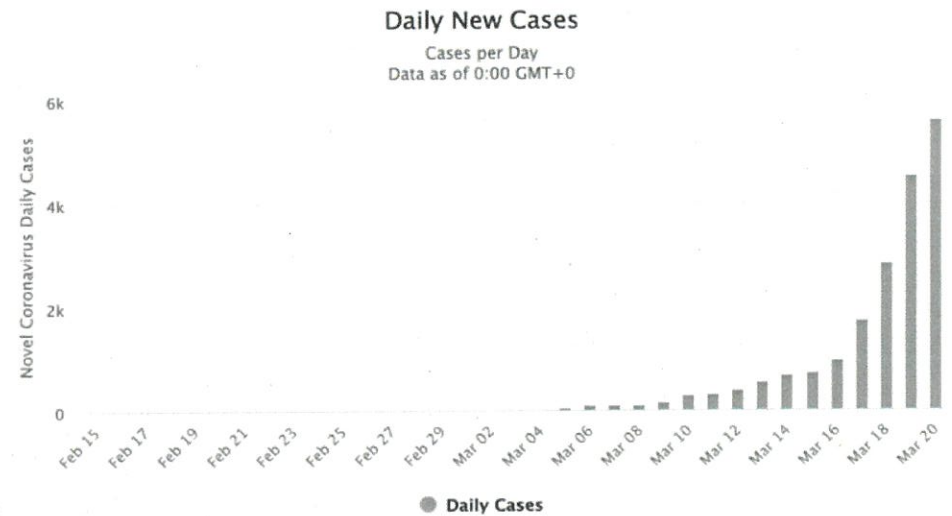


March 20 data for USA

Total Coronavirus Cases in the United States

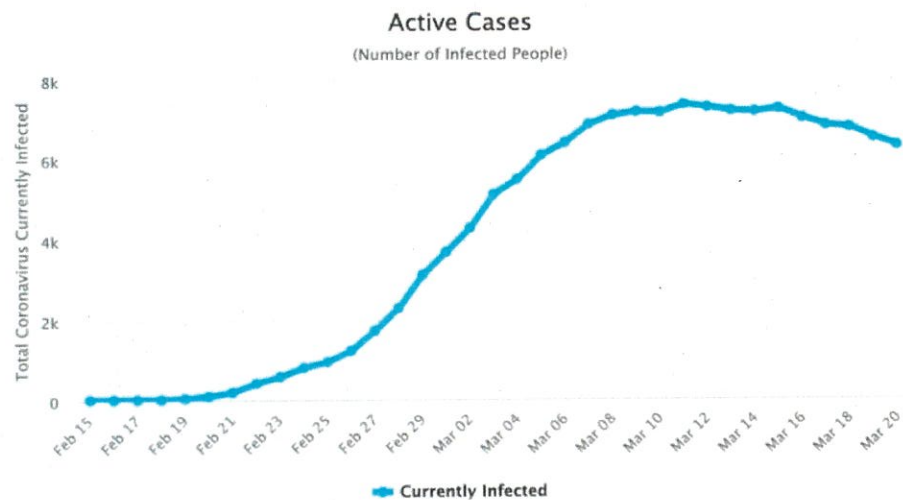


Daily New Cases in the United States

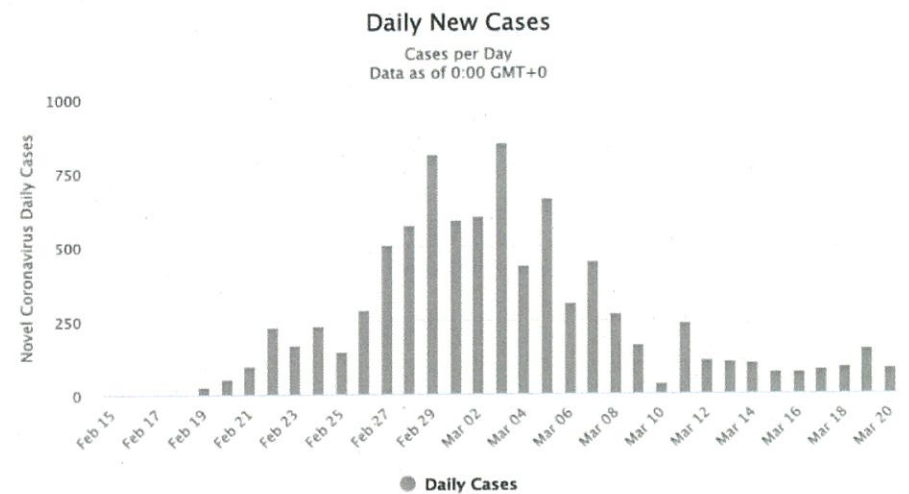


March 20 data for South Korea – note active cases not cumulative

Active Cases in South Korea

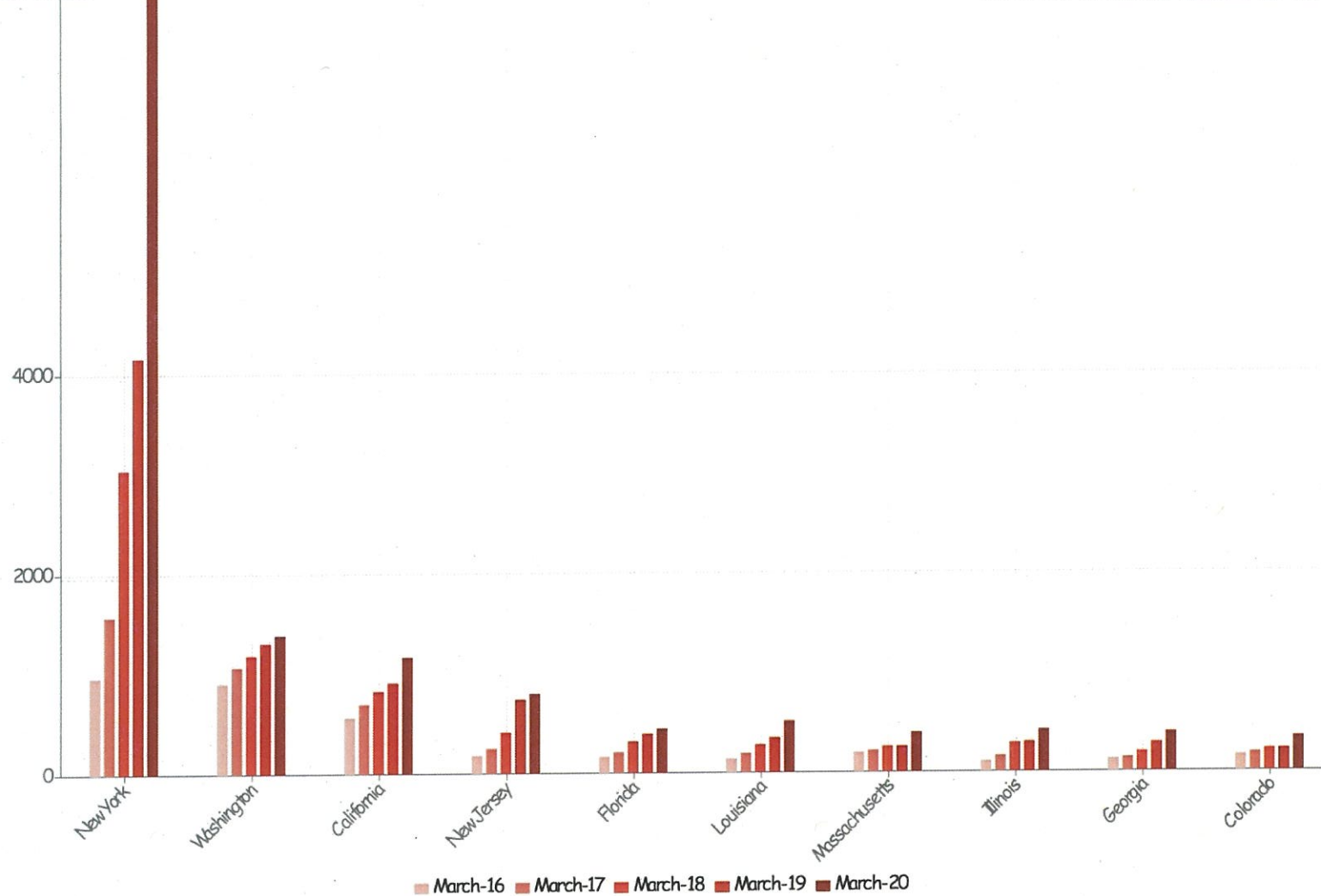


Daily New Cases in South Korea



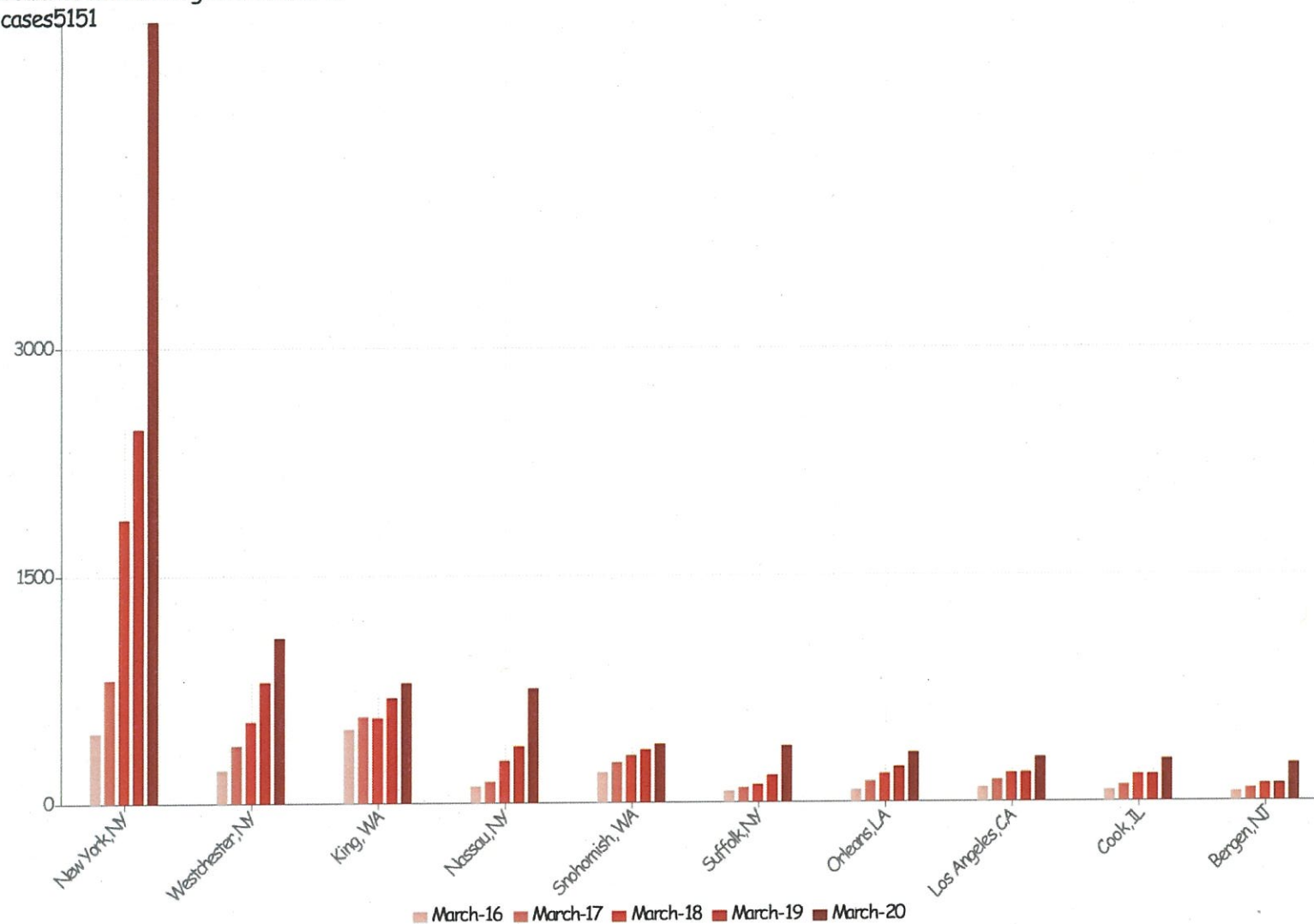
States with the highest number of cases

55% of all new cases in NY 50% of all new cases in NYC

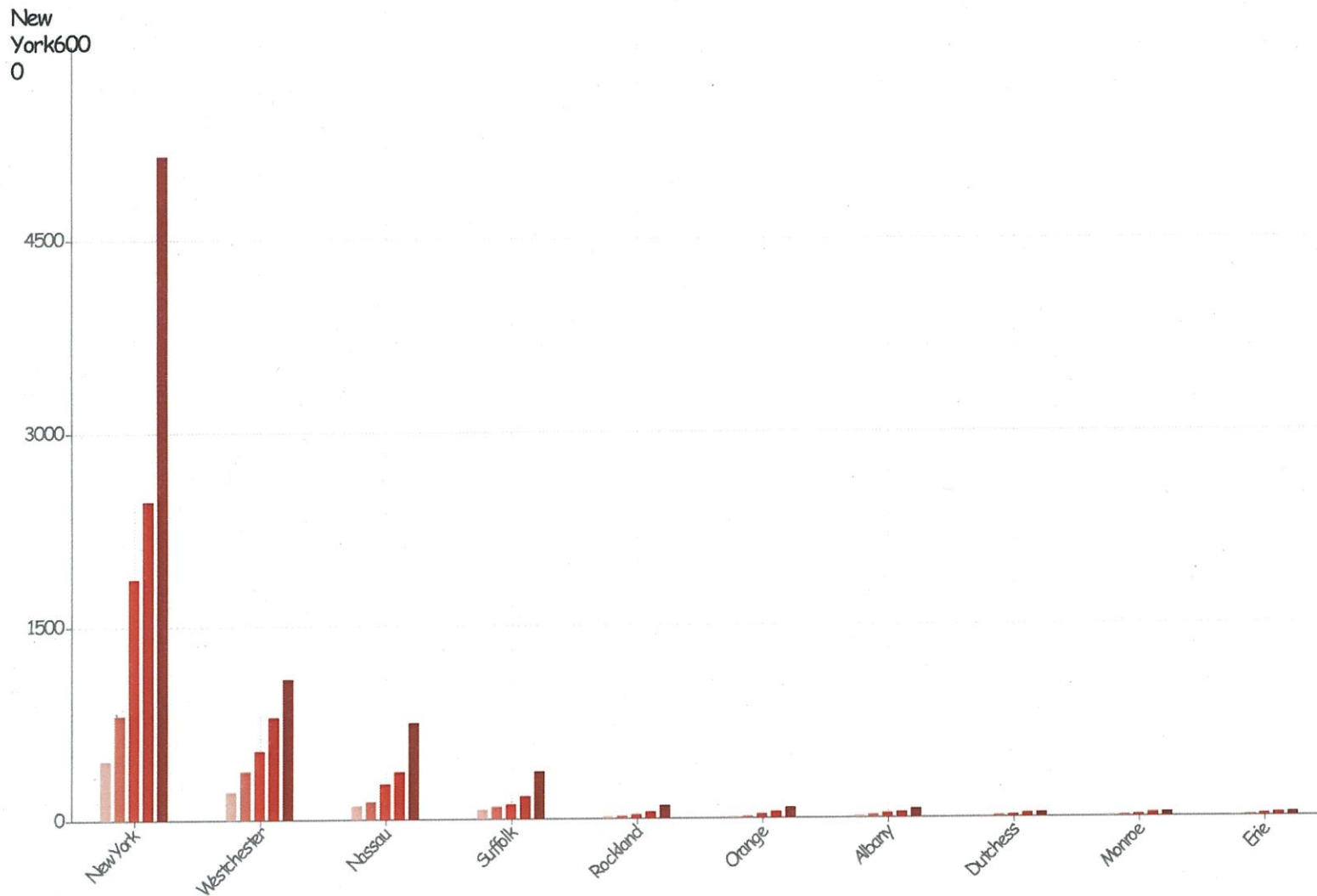


Source: Conference of State Bank Supervisors, as of 18:58 March 20, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed

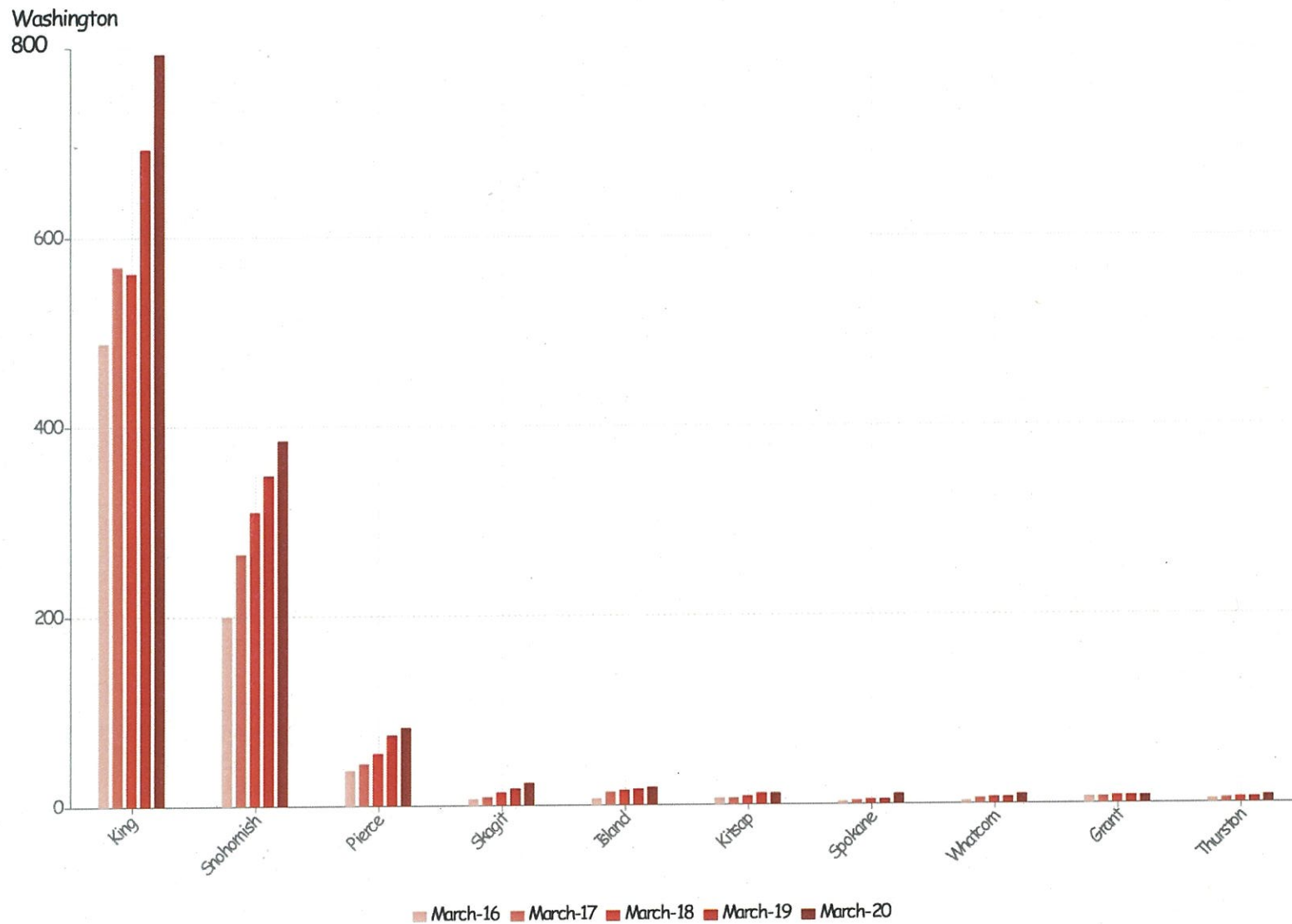
Counties with the highest number of cases



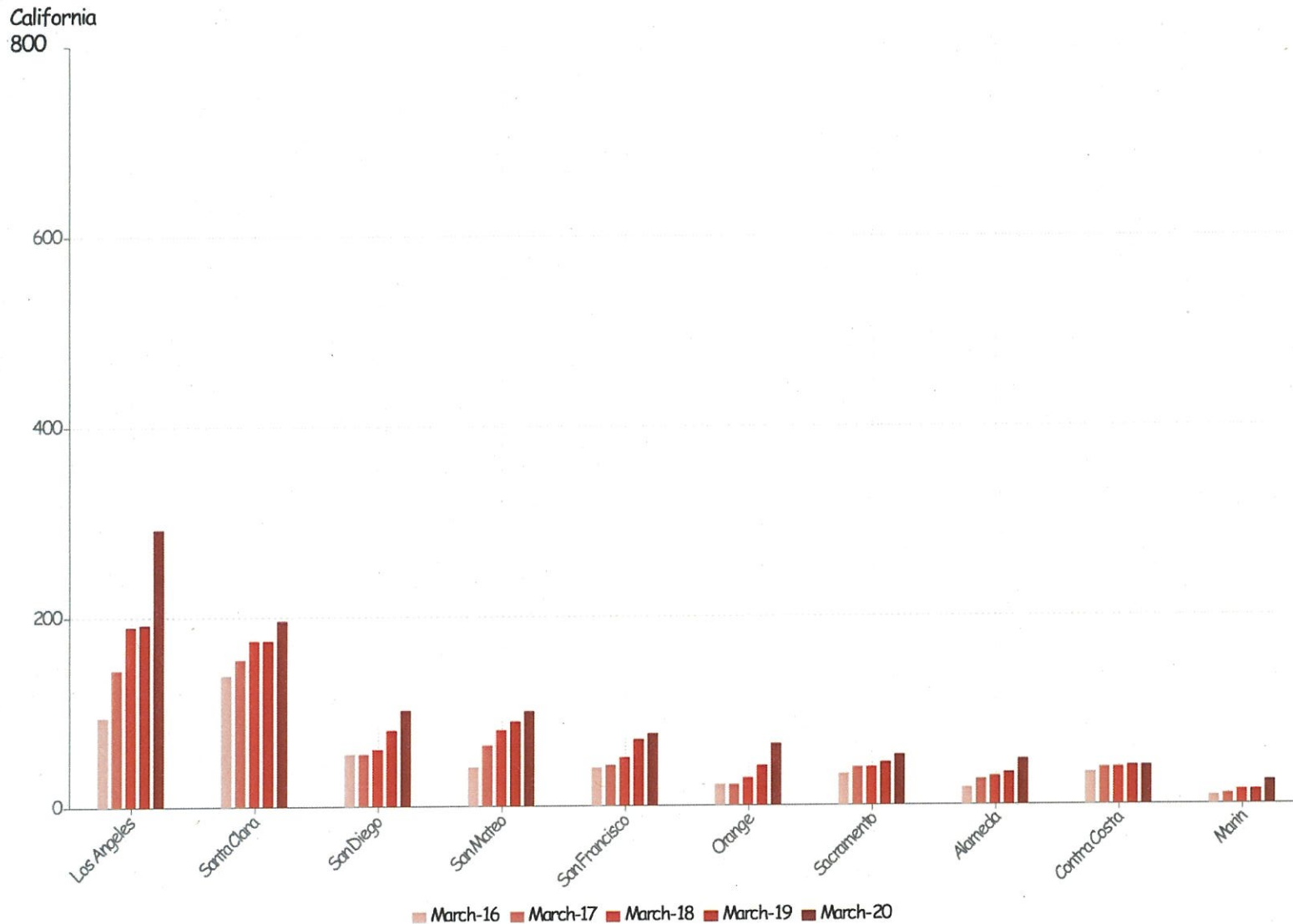
Source: Conference of State Bank Supervisors, as of 18:58 March 20, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed



Source: Conference of State Bank Supervisors, as of 18:58 March 20, 2020. Data sourced from state health department websites reporting may be incomplete or delayed.



Source: Conference of State Bank Supervisors, as of 18:58 March 20, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed



Source: Conference of State Bank Supervisors, as of 18:58 March 20, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed

Massachusetts
0

600

400

200

0

Middlesex

Suffolk

Norfolk

Essex

Berkshire

Worcester

Plymouth

Barnstable

Bristol

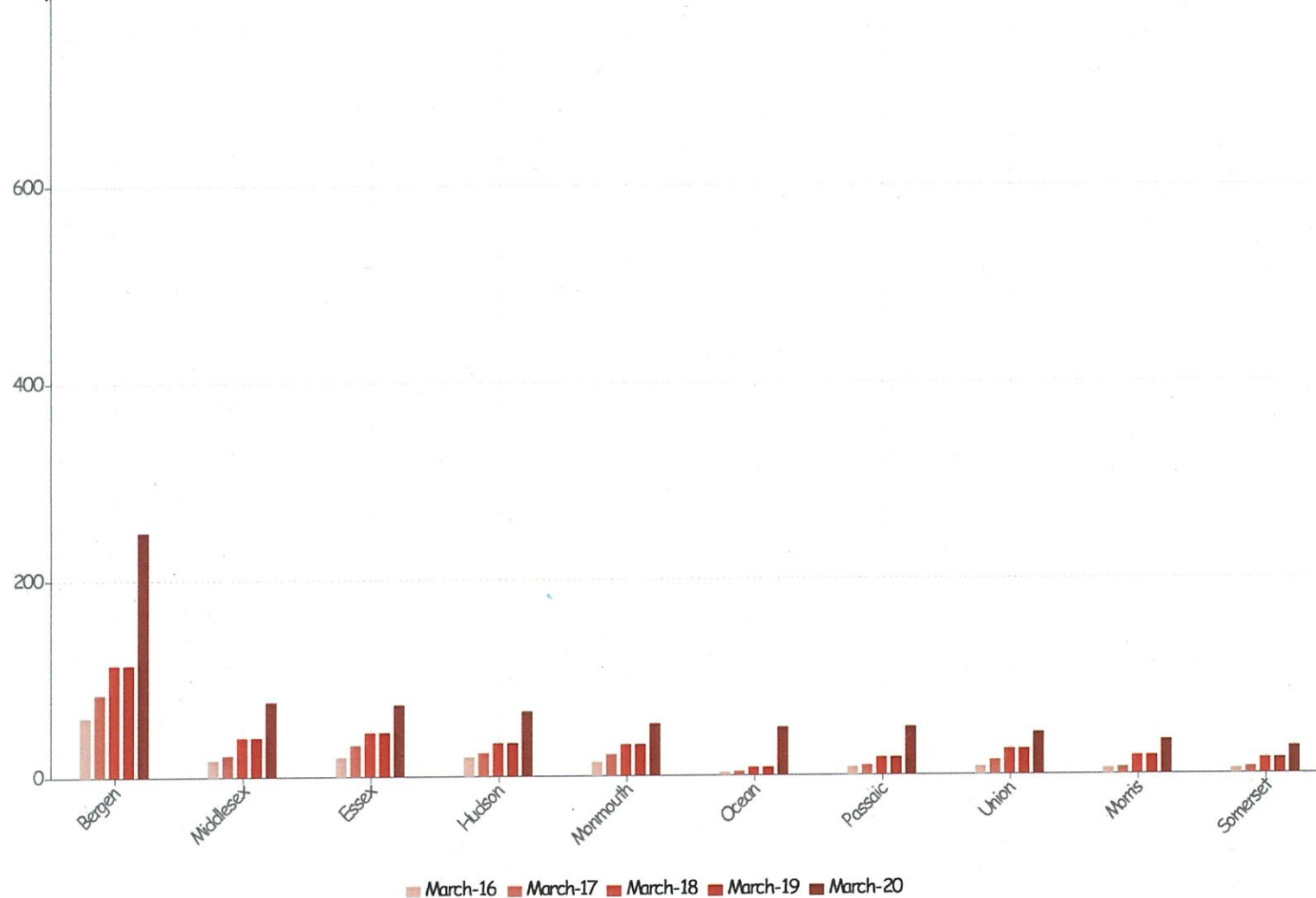
Hampden

March-16 March-17 March-18 March-19 March-20

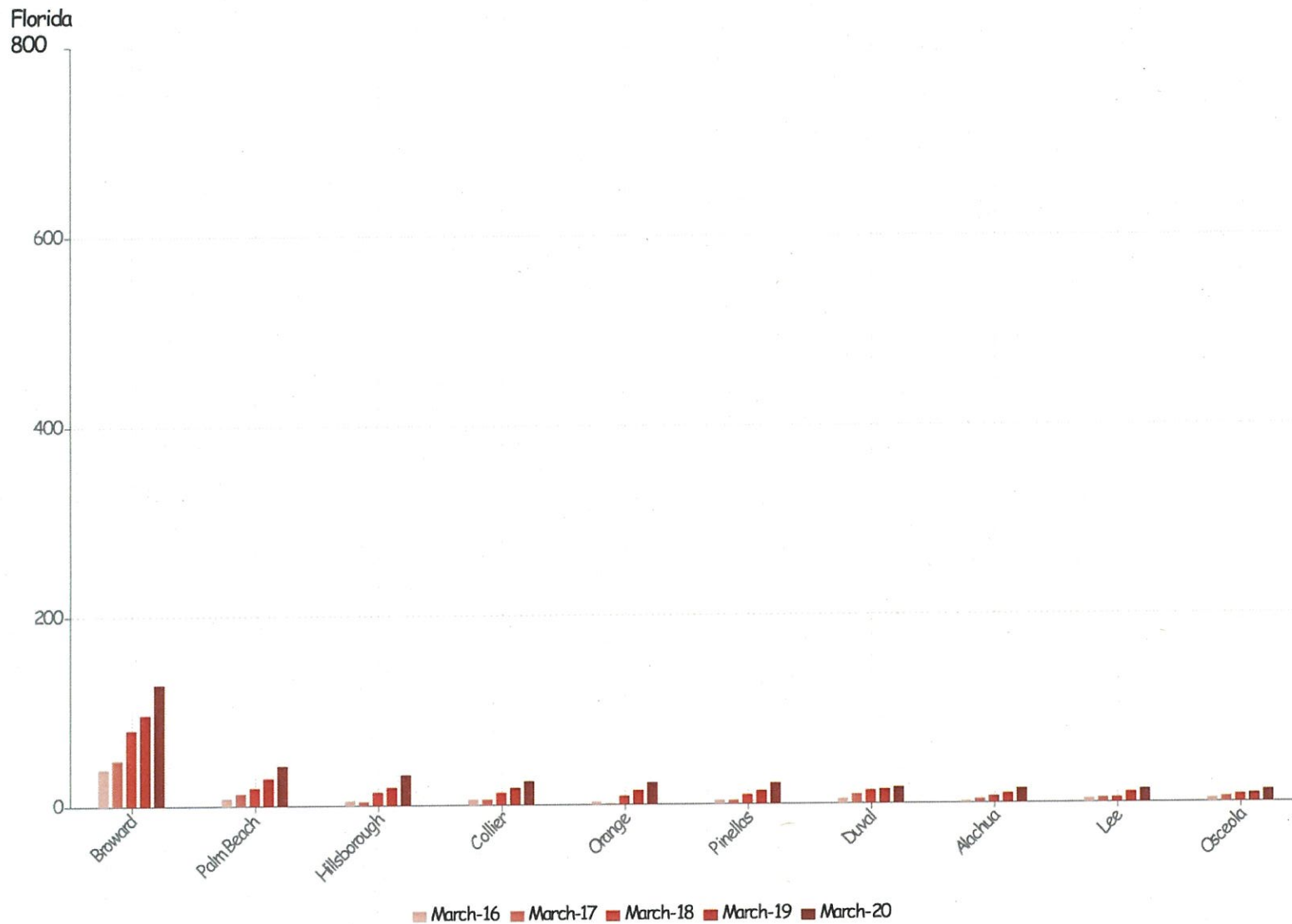
Source: Conference of State Bank Supervisors, as of 18:58 March 20, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed

Page 39 of 71

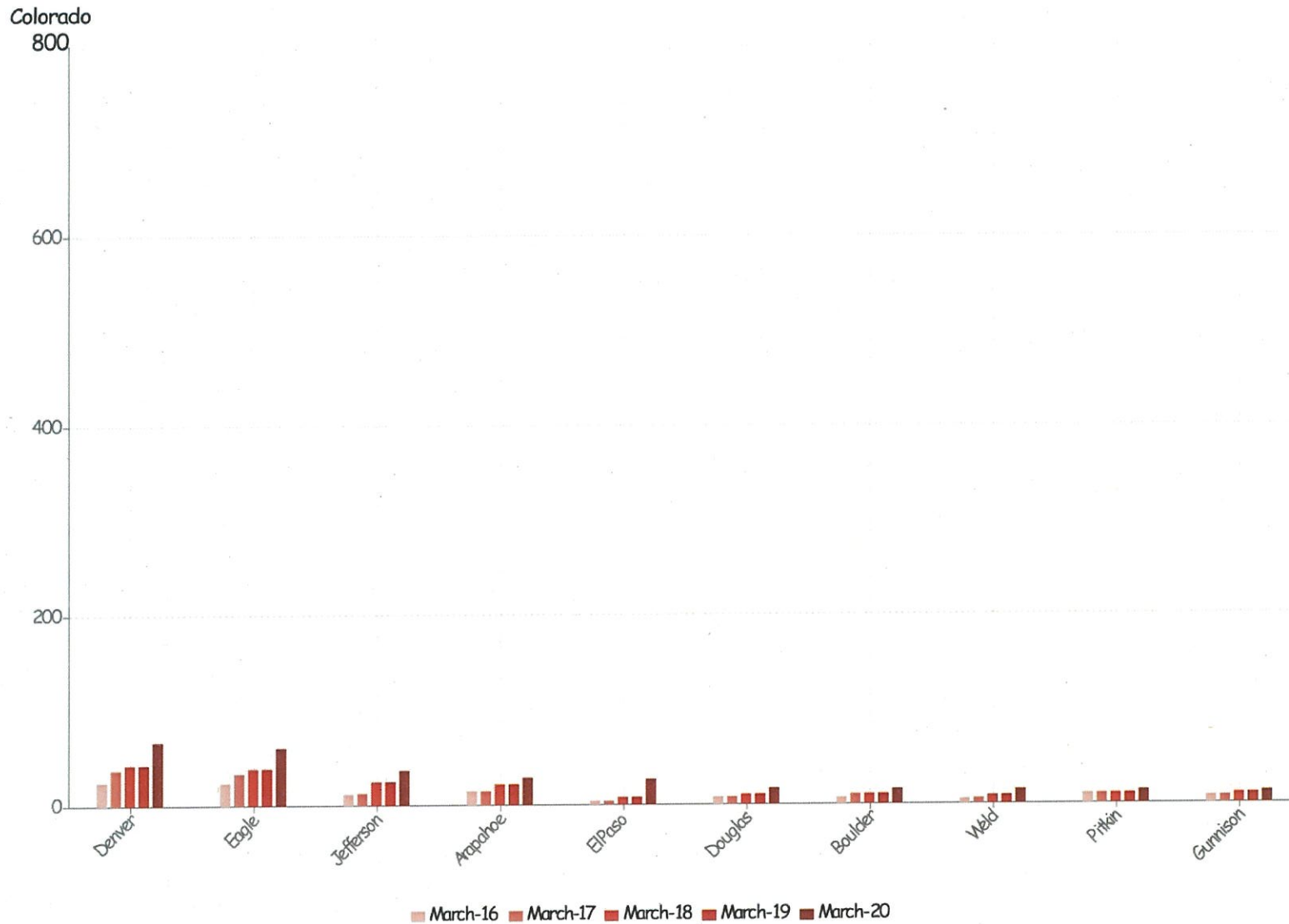
New
Jersey800



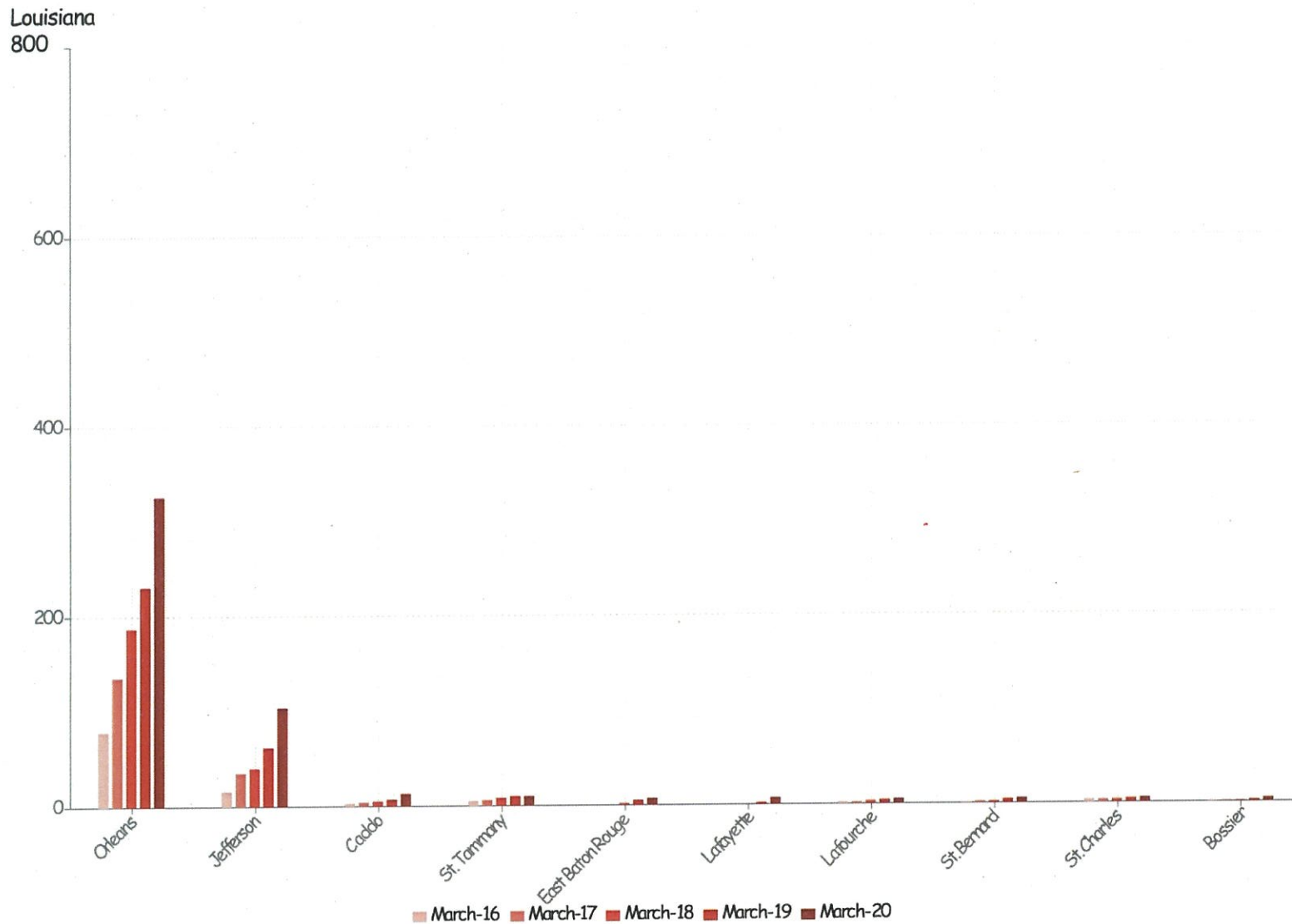
Source: Conference of State Bank Supervisors, as of 18:58 March 20, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed



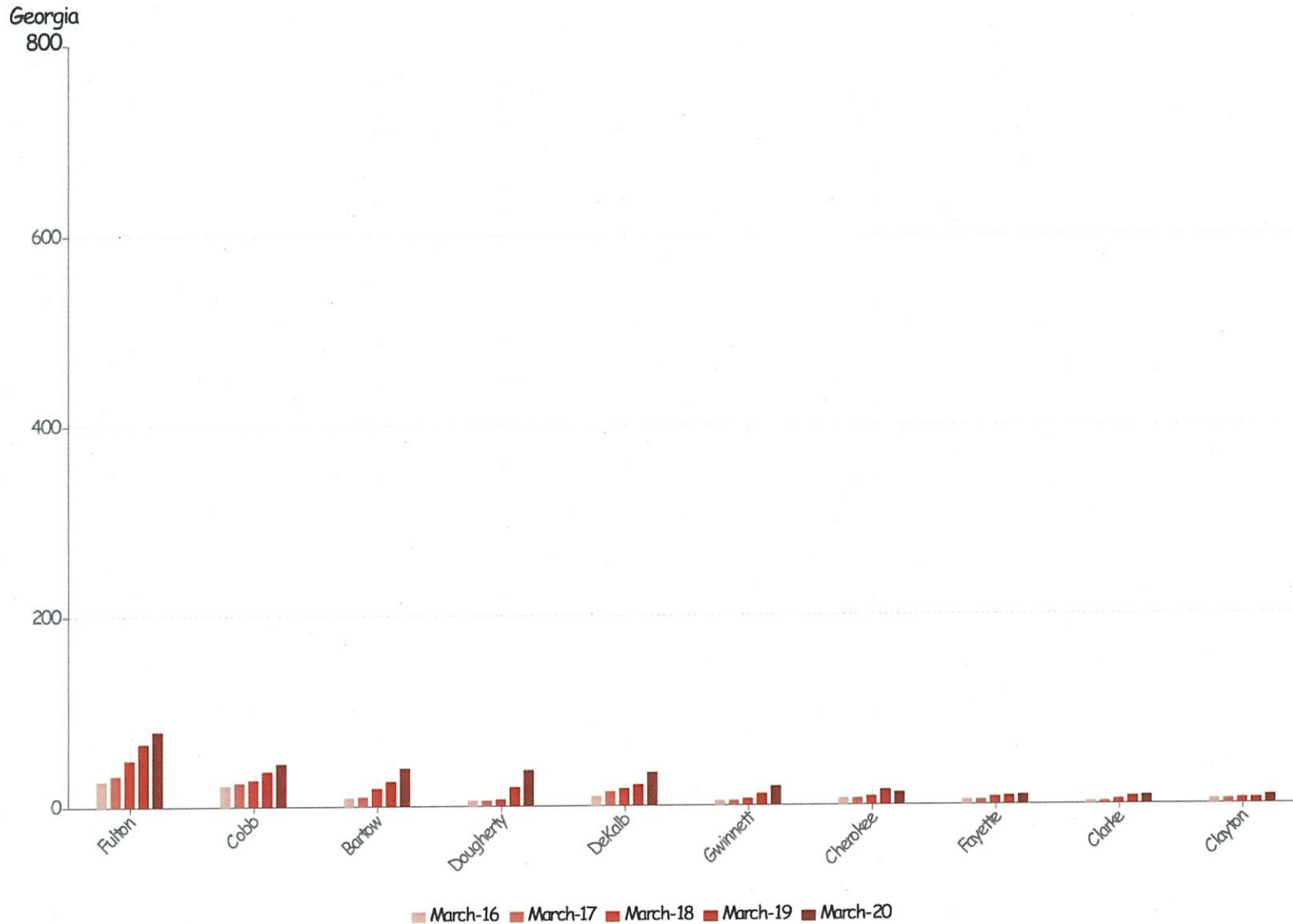
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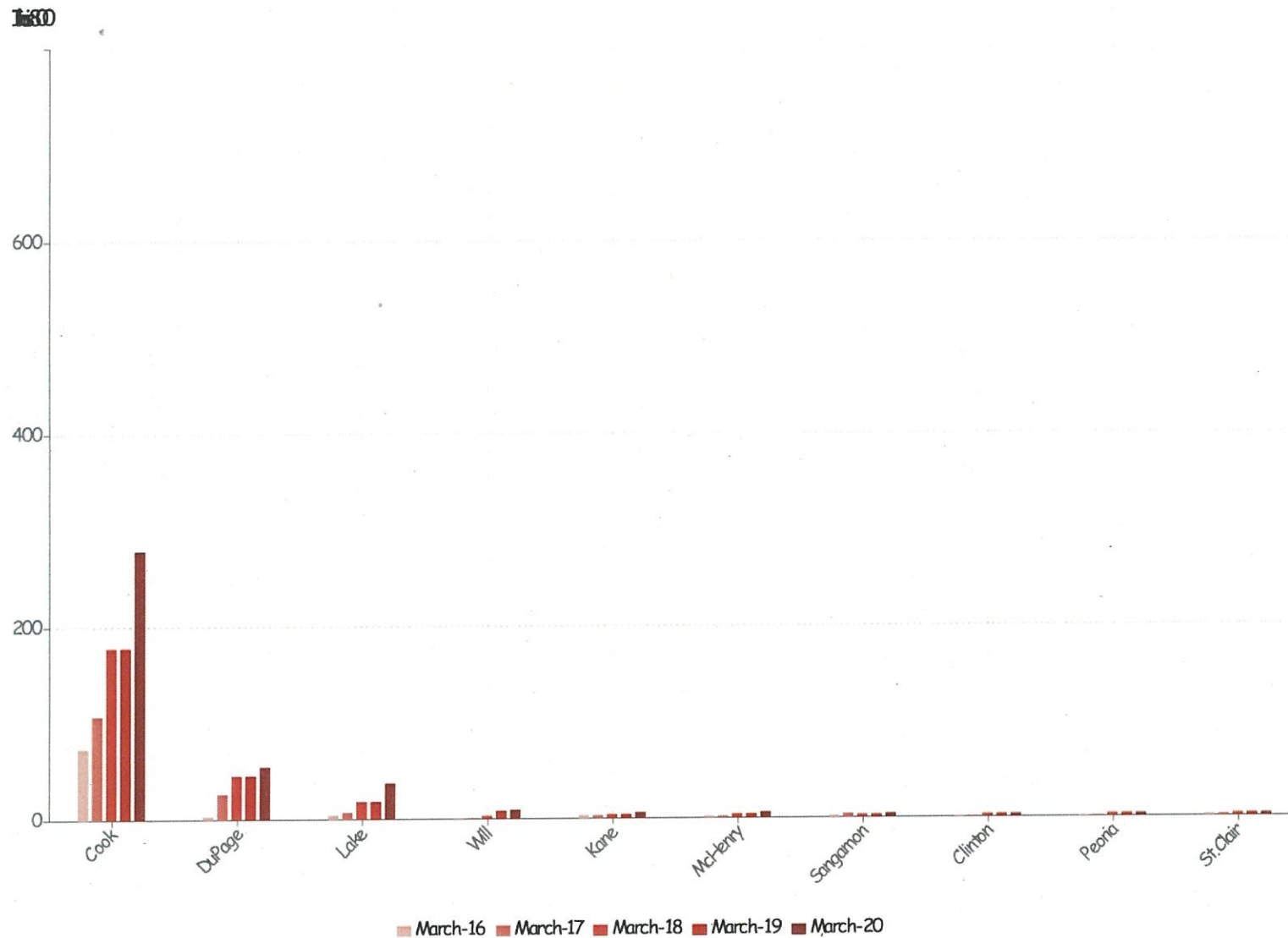
Source: Conference of State Bank Supervisors, as of 18:58 March 20, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed



Source: Conference of State Bank Supervisors, as of 18:58 March 20, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed

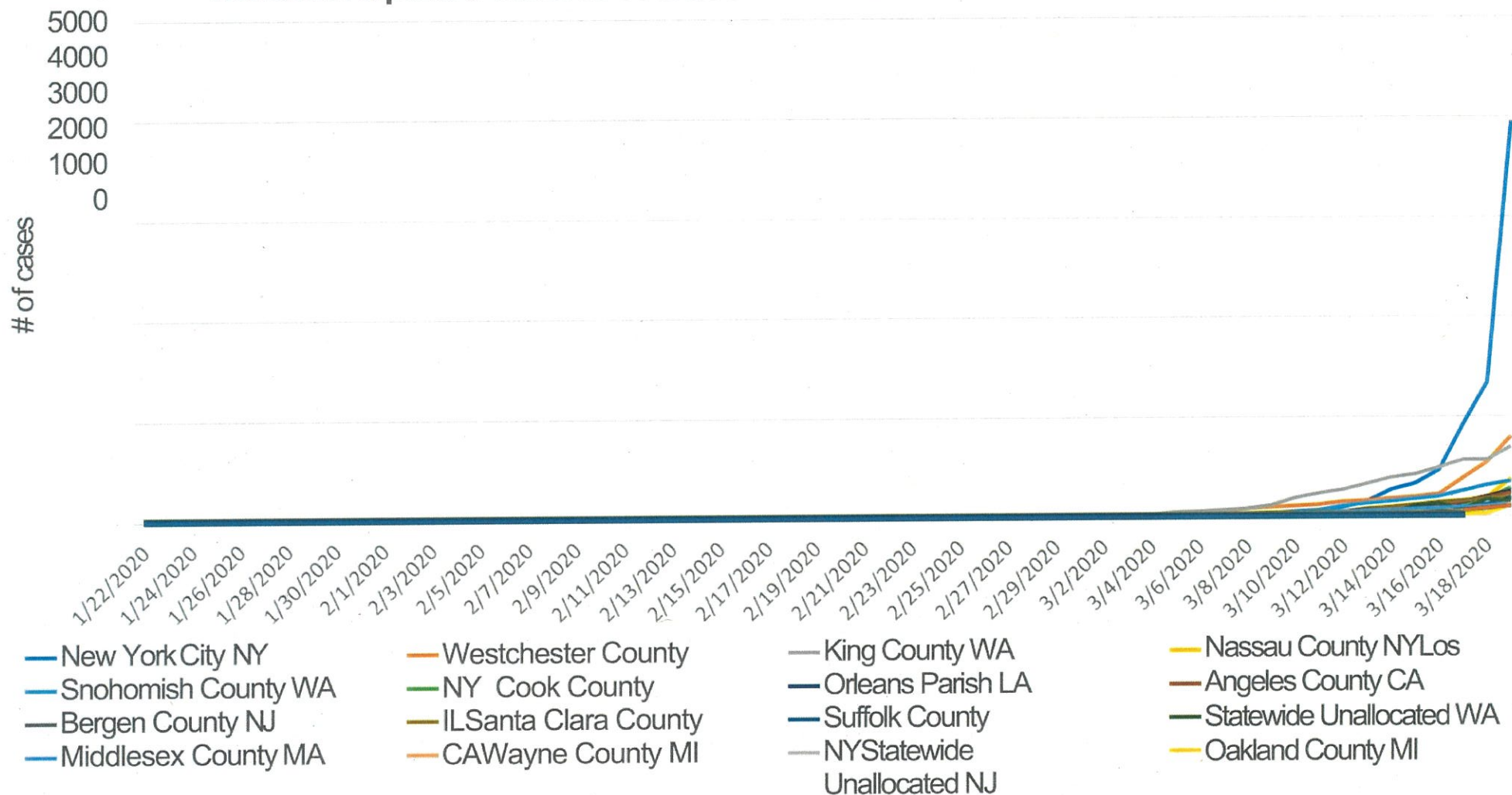


Source: Conference of State Bank Supervisors, as of 18:58 March 20, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed



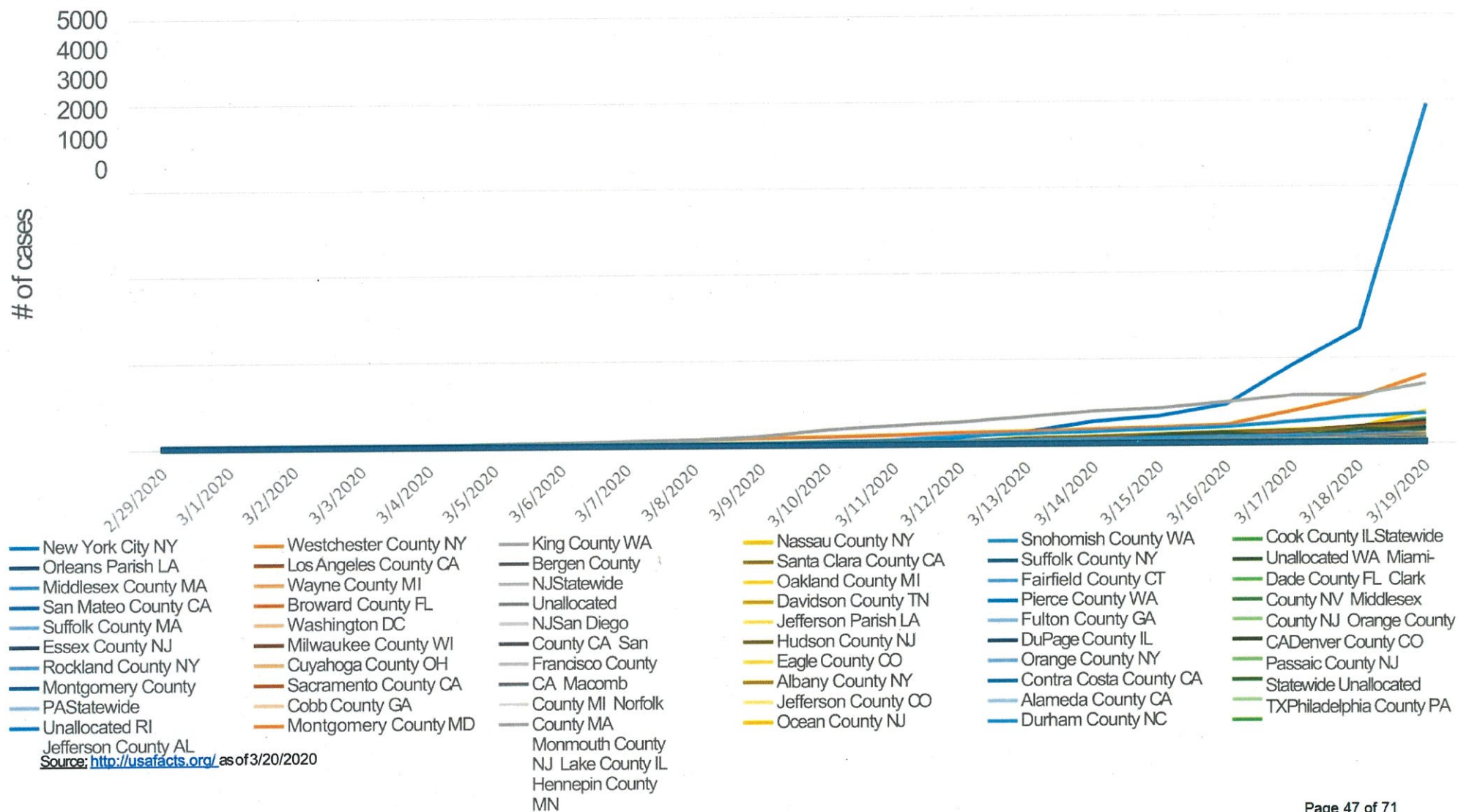
Source: Conference of State Bank Supervisors, as of 18:58 March 20, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed

Trends in Reported Cases in Counties with 20 or More Cases Since 1/22/2020

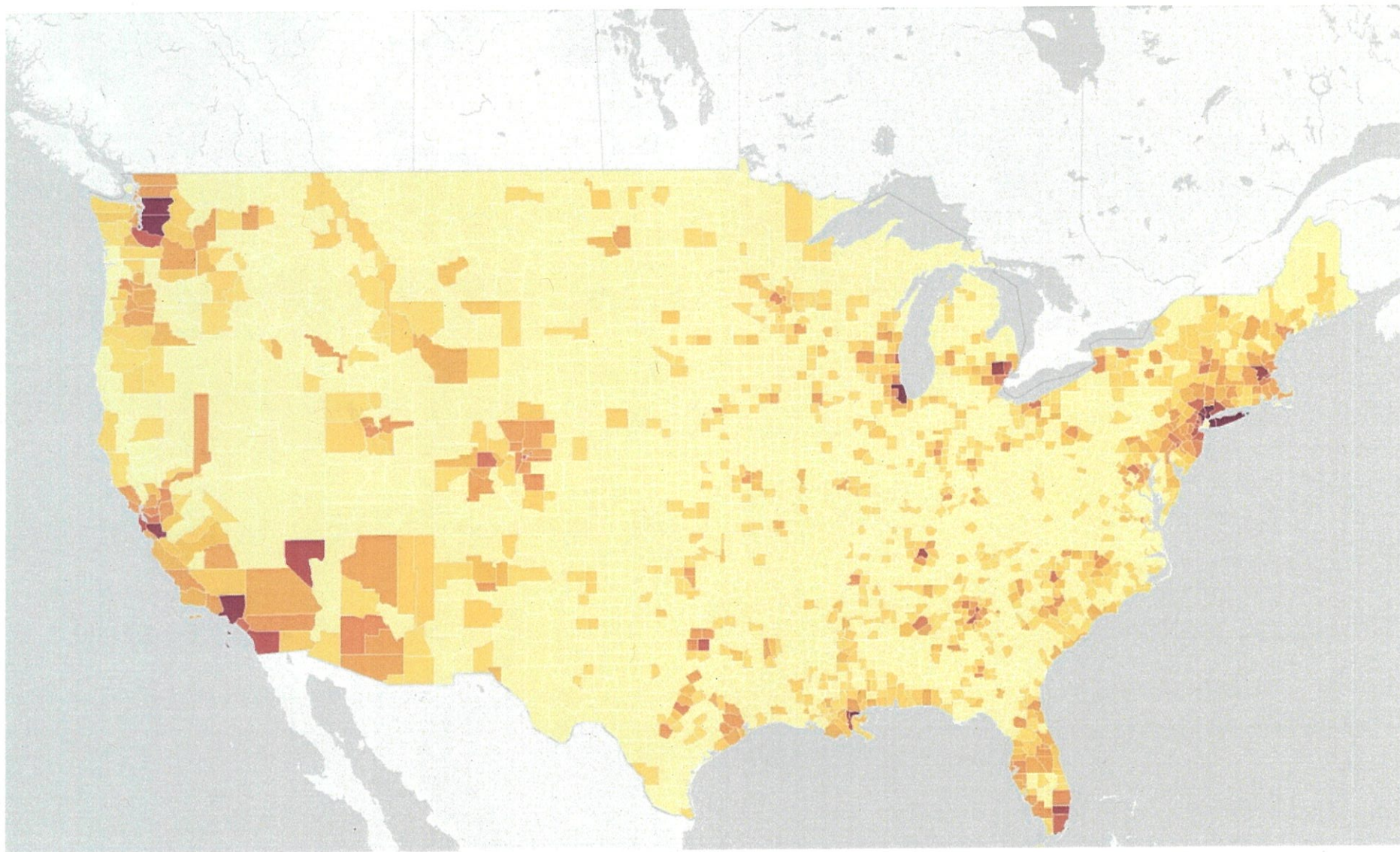


Source: <http://usafacts.org/> as of 3/20/2020

Trends in Reported Cases Since 2/29/2020

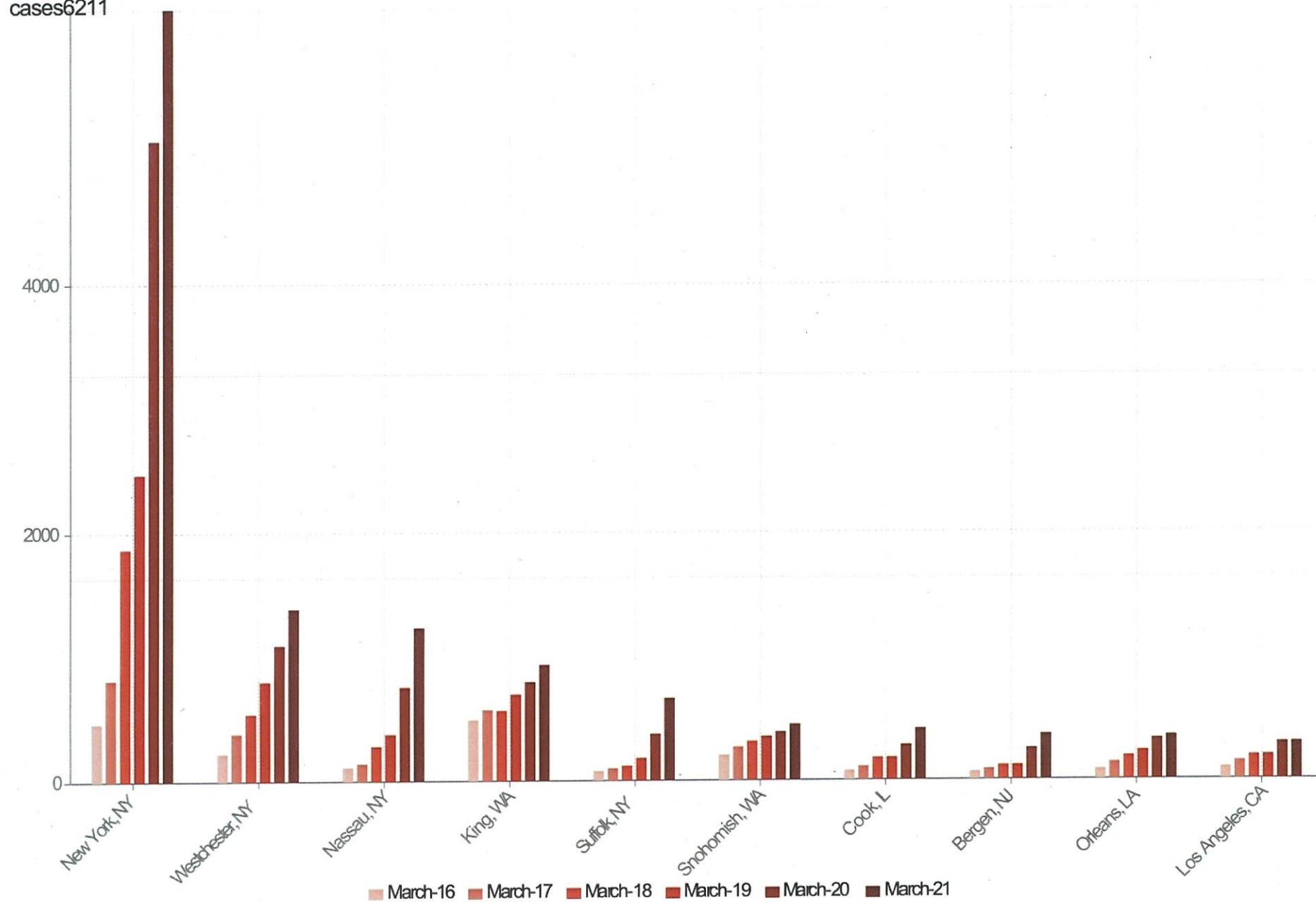


COVID-19 confirmed cases



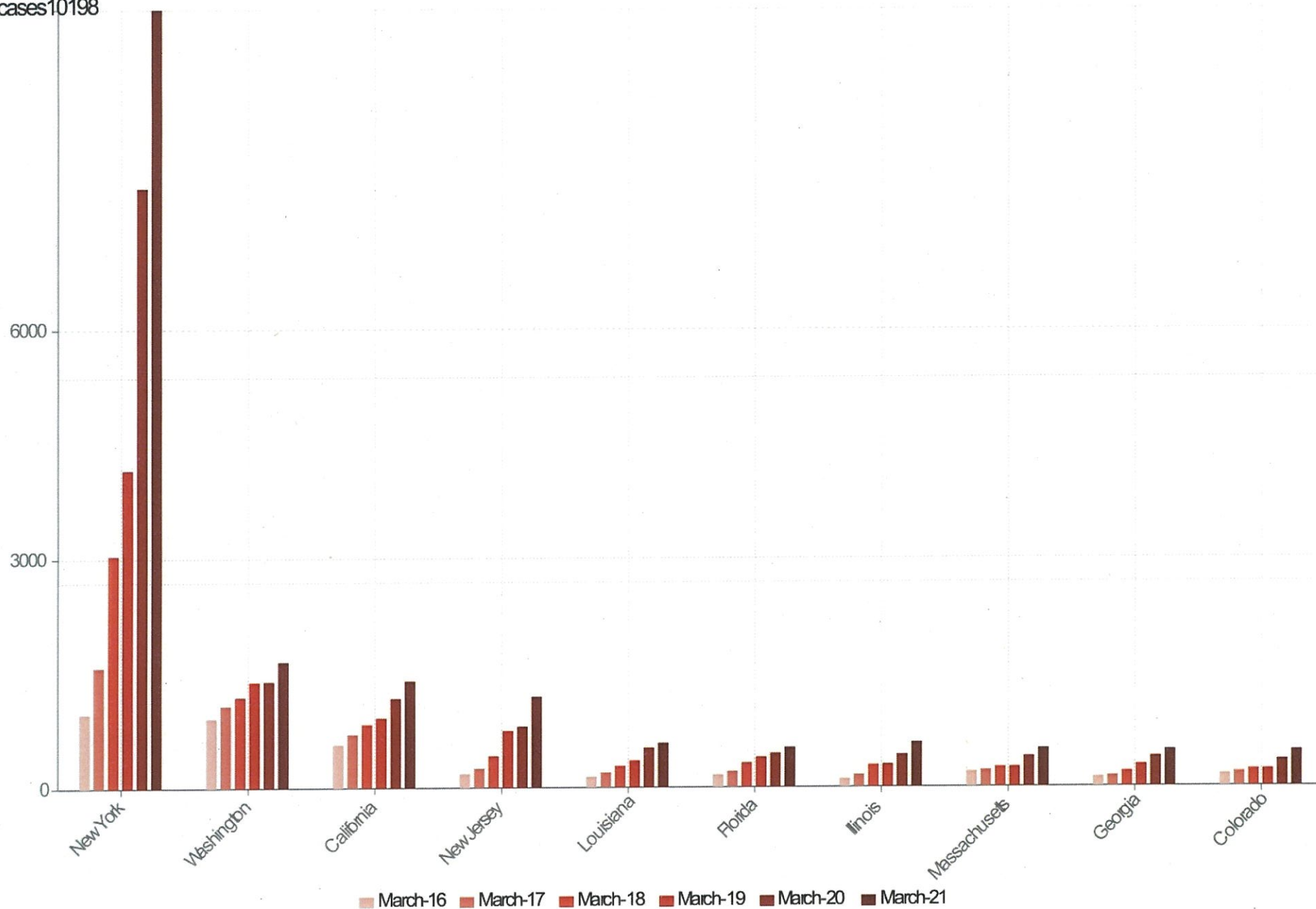
Source: Conference of State Bank Supervisors, as of March 21, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed

Counties with the highest number of cases



Source: Conference of State Bank Supervisors, as of March 21, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed

States with the highest number of cases 10198



Source: Conference of State Bank Supervisors, as of March 21, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed

New
York8000

6000

4000

2000

0

New York

Westchester

Nassau

Suffolk

Rockland

Orange

Albany

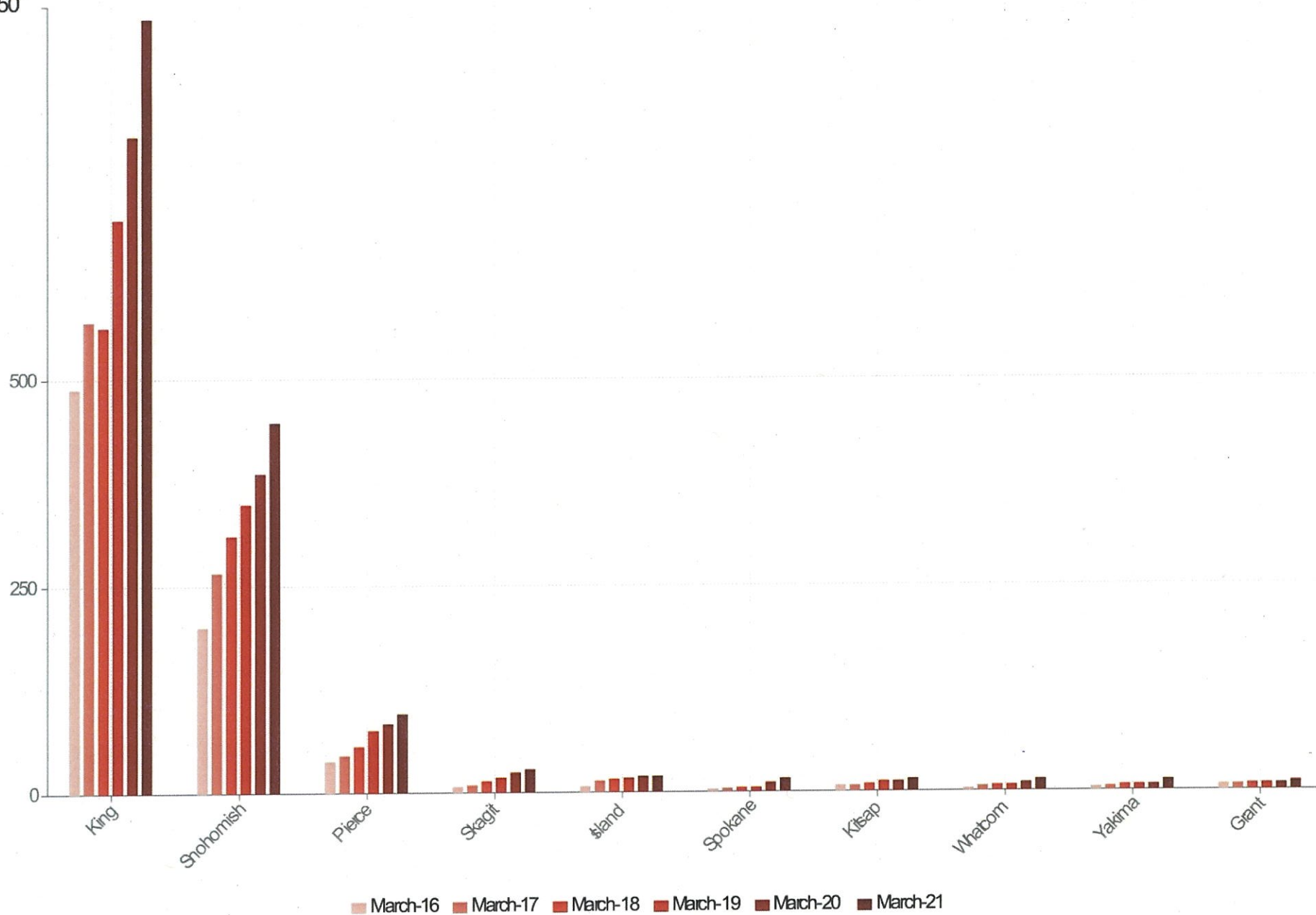
Elizabet

Monroe

Dutchess

March-16 March-17 March-18 March-19 March-20 March-21
Source: Conference of State Bank Supervisors, as of March 21, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed.

Washington
950



Source: Conference of State Bank Supervisors, as of March 21, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed

California
950

500

250

0

Los Angeles

Santa Clara

San Mateo

San Diego

San Francisco

Orange

Alameda

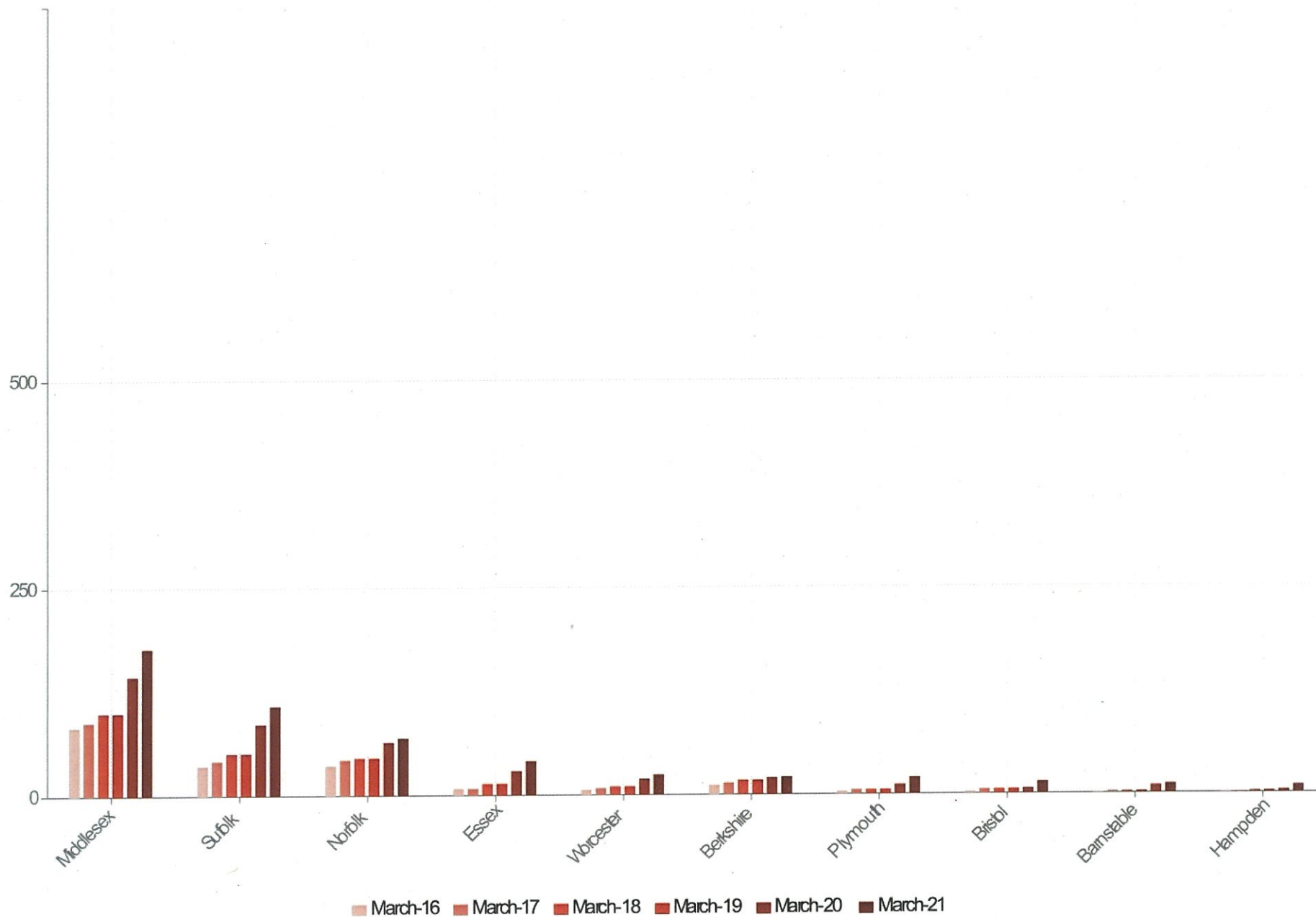
Sacramento

Contra Costa

Main

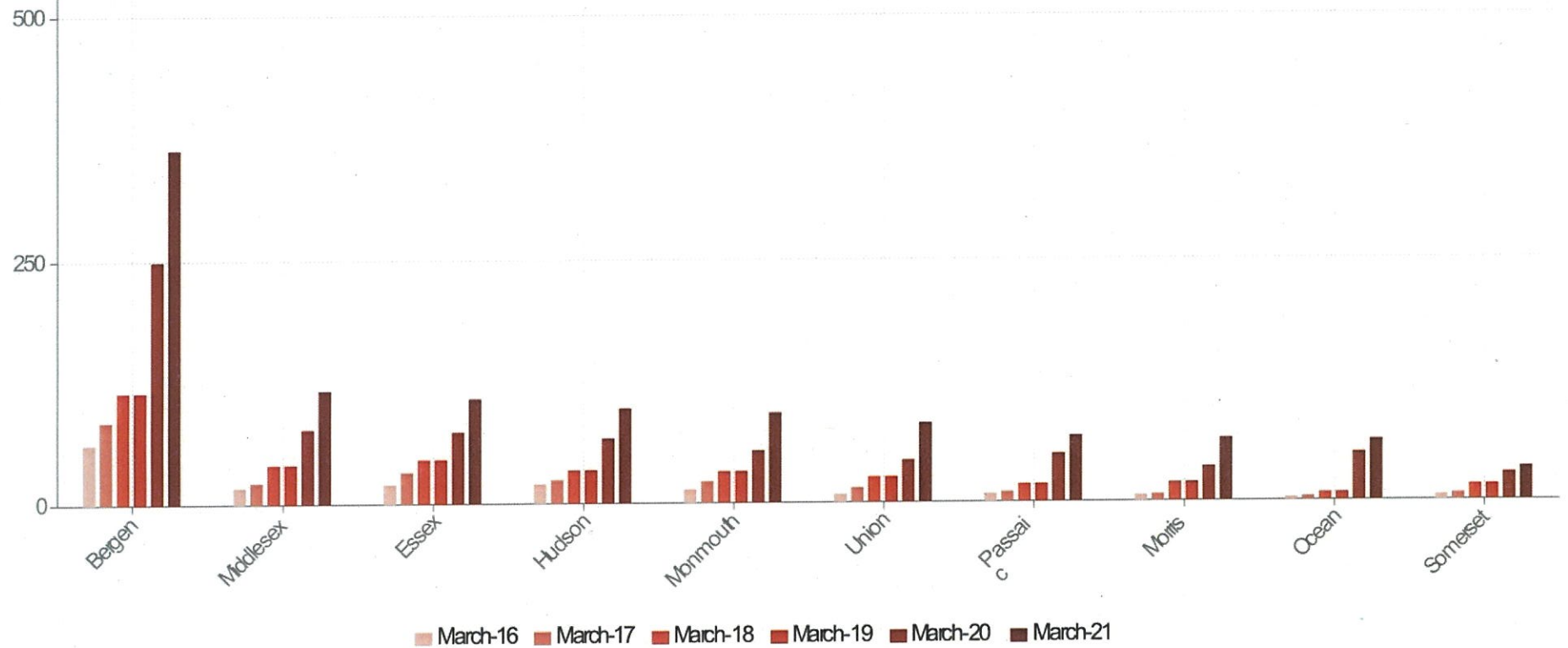
March-16 March-17 March-18 March-19 March-20 March-21

Source: Conference of State Bank Supervisors, as of March 21, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed



Source: Conference of State Bank Supervisors, as of March 21, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed

New
Jersey950



Source: Conference of State Bank Supervisors, as of March 21, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed

Florida
950

500

250

0

Broward

Palm
Beach

Hillsborough

Collier

Pinellas

Orange

Alachua

Duval

Lee

Osceola

March-16 March-17 March-18 March-19 March-20 March-21

Source: Conference of State Bank Supervisors, as of March 21, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed

Colorado
950

500

250

0

Denver

Eagle

Jefferson

Aspen

El Paso

Boulder

Douglas

Vail

Lafayette

Gunnison

March-16 March-17 March-18 March-19 March-20 March-21

Source: Conference of State Bank Supervisors, as of March 21, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed

Louisiana
950

500

250

0

Orleans

Jackson

St. Tammany

Caddo

East Baton Rouge

Terrebonne

St. Charles

St. John the Baptist

Lafayette

St. Bernard

March-16 March-17 March-18 March-19 March-20 March-21

Source: Conference of State Bank Supervisors, as of March 21, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed

Georgia
950

500

250

0

Fulton

Bartow

Cobb

Dougherty

DeKalb

Gwinnet

Cherokee

Lee

Clayton

Clarke

March-16 March-17 March-18 March-19 March-20 March-21

Source: Conference of State Bank Supervisors, as of March 21, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed

100

500

250

0

Cook

DuPage

Lake

Will

Kane

McHenry

McLean

Sangamon

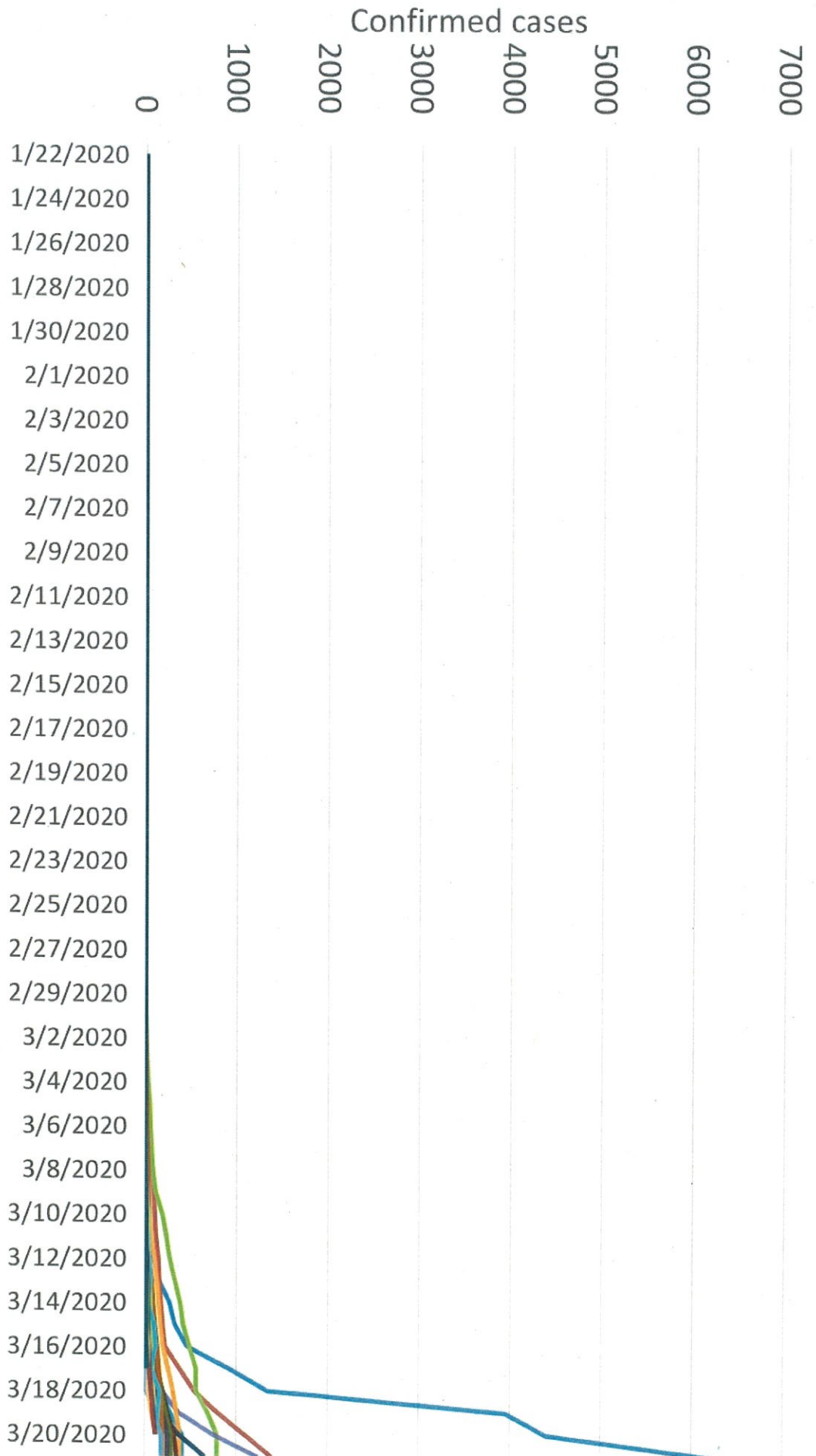
Clinch

Peoria

March-16 March-17 March-18 March-19 March-20 March-21

Source: Conference of State Bank Supervisors, as of March 21, 2020. Data sourced from state health department websites; reporting may be incomplete or delayed

Trends in Reported Cases in Top 20 Counties Since 1/22/2020



VA-20-0509-B-000041

Trends in Reported Cases Since 3/1/2020

