



Exemption 7(F)

Exemption 7(F) of the Freedom of Information Act protects law enforcement information that "could reasonably be expected to endanger the life or physical safety of any individual."¹ Courts have routinely upheld the use of Exemption 7(F) to protect the identities of law enforcement agents.² This exemption originally only protected law

¹ [5 U.S.C. § 552\(b\)\(7\)\(F\)\(2012\)](#); see also [Presidential Memorandum for Heads of Executive Departments and Agencies Concerning the Freedom of Information Act](#), 74 Fed. Reg. 4683 (Jan. 21, 2009) (emphasizing that Freedom of Information Act reflects "a profound national commitment to ensuring an open Government" and directing agencies to "adopt a presumption in favor of disclosure"); accord [Attorney General Holder's Memorandum for Heads of Executive Departments and Agencies Concerning the Freedom of Information Act](#), 74 Fed. Reg. 51879 (Oct. 8, 2009); [FOIA Post, "OIP Guidance: President Obama's FOIA Memorandum and Attorney General Holder's FOIA Guidelines - Creating a New Era of Open Government"](#) (posted 4/17/09).

² See, e.g., [Jordan v. DOJ](#), 668 F.3d 1188, 1198 (10th Cir. 2011) (affirming lower court decision that prison staff roster was properly withheld because release could "expos[e] [staff] to threats, manipulation, and harm"); [Rugiero v. DOJ](#), 257 F.3d 534, 552 (6th Cir. 2001) (protecting names of DEA special agents); [Johnston v. DOJ](#), 163 F.3d 602 (8th Cir. 1998) (unpublished table decision) (protecting names of DEA special agents); [McCoy v. United States](#), No. 04-101, 2006 WL 2459075, at *6 (N.D. W. Va. Aug. 23, 2006) (finding that DEA properly withheld names of DEA special agents, deputy U.S. Marshals, and state and local law enforcement officers); [Blanton v. DOJ](#), 182 F. Supp. 2d 81, 87 (D.D.C. 2002) (acknowledging that disclosure of identities of FBI special agents could endanger their safety), [aff'd](#), 64 F. App'x 787 (D.C. Cir. 2003); [McQueen v. United States](#), 264 F. Supp. 2d 502, 521 (S.D. Tex. 2003) (protecting identities of undercover agents participating in plaintiff's criminal investigation), [aff'd](#), 100 F. App'x 964 (5th Cir. 2004); [Garcia v. DOJ](#), 181 F. Supp. 2d 356, 378 (S.D.N.Y. 2002) (protecting names of FBI special agents and other government agents); [Amro v. U.S. Customs Serv.](#), 128 F. Supp. 2d 776, 788-89 (E.D. Pa. 2001) (protecting names of DEA supervisory special agents and other law enforcement officers); [Hronek v. DEA](#), 16 F. Supp. 2d 1260, 1275-76 (D. Or. 1998) (protecting names and identities of DEA special agents, supervisory special agents, and other law enforcement officers), [aff'd](#), 7 F. App'x 591 (9th Cir. 2001); [Jimenez v. FBI](#), 938 F. Supp. 21, 30-31 (D.D.C. 1996) (holding that disclosure of names of DEA special agents, supervisors, and local law enforcement officers could result in "physical attacks, threats, or harassment"); [Moody v. DEA](#), 592 F.Supp. 556, 559 (D.D.C. 1984) (finding Exemption 7(F) protection appropriate).

enforcement personnel,³ but was later amended and now protects the safety of "any individual."⁴ Courts have held that Exemption 7(F) can protect the names and identifying information of non-law enforcement federal employees, local law enforcement personnel, and other third persons in connection with particular law enforcement matters.⁵ For example, Exemption 7(F) protection has been extended to names of and identifying information about inmates,⁶ private security contractor

even for retired law enforcement officers). But see *Kubik v. BOP*, No. 10-6078, 2011 U.S. Dist. LEXIS 71300, at *36 (D. Or. July 1, 2011) (rejecting use of Exemption 7(F) to withhold names of BOP staff members who responded to riot because inmates saw them and their identities would be discoverable in litigation); *Pub. Emps. for Env'tl. Responsibility v. EPA*, 978 F. Supp. 955, 964 (D. Colo. 1997) (finding no risk to agency investigators in disclosing EPA Inspector General guidelines).

³ See *ACLU v. DOD*, 543 F.3d 59, 79 (2d Cir. 2008), cert. granted, vacated & remanded on other grounds, 130 S. Ct. 777 (2009) (discussing legislative history of Exemption 7(F) and explaining that 1986 amendments to FOIA expanded coverage of exemption to include individuals who are not law enforcement personnel).

⁴ 5 U.S.C. § 552(b)(7)(F); see, e.g., *Amuso v. DOJ*, 600 F. Supp. 2d 78, 101 (D.D.C. 2009) (explaining that "[w]hile courts generally have applied Exemption 7(F) to protect law enforcement personnel or other specified third parties, by its terms, the exemption is not so limited; it may be invoked to protect 'any individual' reasonably at risk of harm" (quoting *Long v. DOJ*, 450 F. Supp. 2d 42, 79 (D.D.C. 2006)), amended, 457 F. Supp. 2d 30 (D.D.C. 2006), amended further on reconsideration, 479 F. Supp. 2d 23 (D.D.C. 2007) (appeal pending)).

⁵ See, e.g., *Adionser v. DOJ*, 811 F. Supp. 2d 284, 301 (D.D.C. 2011) (protecting identities of "special agents, law enforcement officers, government employees, and confidential sources"); *Anderson v. BOP*, 806 F. Supp. 2d 121, 128 (D.D.C. 2011) (agreeing with agency that in response to plaintiff's request for records concerning his transfer to different prison facility, information on six pages regarding incident at prison was properly withheld because it "could jeopardize the safety of individual(s) as it would likely result in harassment and/or retaliation, to possibly include physical assaults, directed toward individual(s) identified in the investigation and resulting in a threat not only to the named individual but also the safe operation of the institution"); *Peter S. Herrick's Customs & Int'l Trade Newsletter v. U.S. Customs & Border Prot.*, No. 04-00377, 2006 WL 1826185, at *9 (D.D.C. June 30, 2006) (finding that disclosure of U.S. Customs officials' identities and information regarding seized contraband could endanger life or physical safety of both Customs officials and innocent bystanders); *Garcia*, 181 F. Supp. 2d at 378 (protecting "names and/or identifying information concerning private citizens and third parties who provided information" to FBI); *Pfeffer v. Dir., BOP*, No. 89-899, 1990 U.S. Dist. LEXIS 4627, at *5 (D.D.C. Apr. 18, 1990) (holding that information about smuggling weapons into prisons could reasonably be expected to endanger physical safety of "some individual" and therefore is properly withheld).

⁶ *Jordan v. DOJ*, No. 07-2303, 2009 WL 2913223, at *25 (D. Colo. Sept. 8, 2009) (concluding that Shakedown log, which documents BOP efforts to uncover contraband, was

companies,⁷ and medical personnel.⁸ Courts have also upheld the use of Exemption 7(F) to protect the identities of informants and sources.⁹ One court has even approved the use of Exemption 7(F) to withhold information that would put the requester's own

properly withheld because it implicates privacy and safety concerns for inmates), *aff'd*, 668 F.3d 1188 (10th Cir. 2011); *Lee v. DOJ*, No. 04-1013, 2007 WL 2852538, at *7 (W.D. Pa. Sept. 27, 2007) (finding agency properly withheld "names and personal information" about inmates involved in investigations of wrong-doing at correctional facilities because disclosure could subject them to "retaliatory physical harm"); *Brady-Lunny v. Massey*, 185 F. Supp. 2d 928, 932 (C.D. Ill. 2002) (finding that release of list of inmates' names would endanger life and physical safety "given inmates' gang ties, interest in escape, and motives for violence"); *Anderson v. U.S. Marshals Serv.*, 943 F. Supp. 37, 40 (D.D.C. 1996) (protecting identity of inmate who required separation from incarcerated requester when disclosure could endanger his safety).

⁷ *L.A. Times Commcn's, LLC v. Dep't of the Army*, 442 F. Supp. 2d 880, 898-900 (C.D. Cal. 2006) (applying Exemption 7(F) where disclosure of private security contractor company names could endanger life or physical safety of many individuals).

⁸ *Sanders v. DOJ*, No. 91-2263, 1992 WL 97785, at *5 (D. Kan. Apr. 21, 1992) (finding that disclosing identities of medical personnel who prepared requester's mental health records would endanger their safety).

⁹ See, e.g., *Hammouda v. OIP*, No. 12-0130, 2013 WL 363191 (D.D.C. Jan. 31, 2013) (finding that FBI properly withheld information identifying individual who provided information concerning "'alleged criminal activities'" because disclosure "'could reasonably be expected to endanger his/her life and/or physical safety'"); *Fischer v. DOJ*, 723 F. Supp. 2d 104, 111 (D.D.C. 2010) (holding that reports of death threats against confidential sources justified FBI's use of Exemption 7(F)); *Quinto v. DOJ*, 711 F. Supp. 2d 1, 8 (D.D.C. 2010) (concluding that release of information pertaining to inmate placement would reveal sources of information and "could lead to retaliation against those individuals"); *Amuso*, 600 F. Supp. 2d at 101-02 (concluding that agency properly withheld information pertaining to "source symbol number informants and the names and identifying information concerning cooperating witnesses" because "disclosure of this information could threaten the lives of or otherwise endanger their safety"); *Cozen O'Connor v. Dep't of Treasury*, 570 F. Supp. 2d 749, 786 (E.D. Pa. 2008) (finding agency properly redacted names and personal identifiers of sources to protect them from retribution in connection with their "involve[ment] in ongoing criminal investigations of terrorist activities"); *Miller v. DOJ*, 562 F. Supp. 2d 82, 124-25 (D.D.C. 2008) (finding agency properly withheld information pertaining to symbol-numbered informant and cooperating witnesses); *Diaz v. DEA*, 555 F. Supp. 2d 124, 126 (D.D.C. 2008) (finding agency properly withheld documents that "relate to the identity and history of cooperation of an individual who has assisted DEA agents in several drug investigations"); *Butler v. DOJ*, 368 F. Supp. 2d 776, 786 (E.D. Mich. 2005) (protecting information that could endanger lives of individuals who provided information to DEA); *McQueen*, 264 F. Supp. 2d, at 521 (protecting identities of informants participating in plaintiff's criminal investigation); *Jimenez*, 938 F. Supp. at 30-31 (protecting names and identifying information furnished by confidential sources).

safety at risk.¹⁰ Finally, in keeping with the statutory language, courts have applied Exemption 7(F) in order to protect persons from possible harm from a requester who has threatened them in the past, or one who has a violent past or who has a connection to violent organizations.¹¹

While Exemption 7(F) has historically been used to withhold names and other identifying information concerning individuals at risk of retaliation and harm, the plain language of the statute indicates that it can also be used to withhold any type of information that creates a risk of harm or retaliation to an individual, not just identifying information.¹² Accordingly, courts have upheld the use of Exemption 7(F) to withhold inundation maps because they show which areas downstream from dams are at risk for flooding in the event a dam is damaged.¹³ The exemption has also been used

¹⁰ See Mosby v. Hunt, No. 09-1917, 2010 WL 2794250, at *1 (D.D.C. July 15, 2010) (describing BOP's application of 7(F) as "novel twist," but approving withholding because "plaintiff does not appear to have waived the protection contemplated by exemption 7(F)"), aff'd, No. 10-5296, 2011 WL 3240492 (D.C. Cir. Sept. 29, 2011).

¹¹ See, e.g., Sussman v. USMS, 734 F. Supp. 2d 138, 143 (D.D.C. 2010) (concluding that "information provided by a third-party individual that could pose a potential threat to a judge" was properly withheld); Brunetti v. FBI, 357 F. Supp. 2d 97, 109 (D.D.C. 2004) (approving withholding of identities of individuals who cooperated with agency, given "violent nature of the La Cosa Nostra organization"); Shores v. FBI, 185 F. Supp. 2d 77, 85 (D.D.C. 2002) (approving nondisclosure of names of, and identifying information about, cooperating witnesses when information obtained from one of those witnesses led to plaintiff's murder conviction and prompted plaintiff to attempt to murder witness's family member); Blanton, 182 F. Supp. 2d at 87 (protecting identities of FBI special agents and non-law enforcement personnel assisting in investigation, because "[e]ven though [requester] is incarcerated, his threats against persons responsible for his arrest and now his conviction make it possible that these individuals could be targets of physical harm"); Burke v. DOJ, No. 96-1739, 1999 WL 1032814, at *9 (D.D.C. Sept. 30, 1999) (finding that disclosing identities of "agents, other agencies' personnel and sources could expose [them] to violent retaliation," given requester's violent history); Anderson v. DOJ, No. 95-1888, 1999 U.S. Dist. LEXIS 4731, at *10-11 (D.D.C. Mar. 31, 1999) (finding that releasing witnesses' names could subject them to harassment and threats, given requester's history of carrying firearms); Crooker v. IRS, No. 94-0755, 1995 WL 430605, at *6 (D.D.C. Apr. 27, 1995) (protecting confidential informants when requester has history of harassing, intimidating, and abusing witnesses); Manna v. DOJ, 815 F. Supp. 798, 810 (D.N.J. 1993) (finding that releasing agency reports would endanger life or physical safety of associates of requester in organized crime case), aff'd on other grounds, 51 F.3d 1158 (3d Cir. 1995).

¹² See 5 U.S.C. § 552(b)(7)(F); accord Elec. Privacy Info. Center v. DHS, No. 14-5013, 2015 WL 525183, at *4 (D.C. Cir. Feb. 10, 2015) (approving withholding of protocol for shutting down wireless networks as disclosure "would enable actors to circumvent or interfere with a law enforcement strategy designed to prevent activation of improvised explosive devices").

¹³ See Pub. Emps. For Env't'l Resp. v. U.S. Sect. Int'l Boundary & Water Comm'n, 839 F. Supp. 2d 304 (D.D.C. 2012) (approving withholding of inundation maps because of concern

to withhold the details of the physical structure and security plans of a BOP facility because of the risks to prison security that would be created by disclosure.¹⁴ One court has approved the application of this exemption to a description of a home-made machine gun in an FBI laboratory report because its disclosure would create the real possibility that law enforcement officers would have to face "individuals armed with home-made devices constructed from the expertise of other law enforcement people."¹⁵

In addition, while Exemption 7(F) is often used to protect specific, named individuals, some courts have recognized that it has the potential for broader reach and have applied it accordingly. Recently, in Electronic Privacy Information Center v. Department of Homeland Security, the Court of Appeals for the District of Columbia Circuit reversed a district court's decision that Exemption 7(F) could not be used to withhold a protocol for disabling wireless communications during critical emergencies.¹⁶ The lower court had held that the government had not specifically identified individuals who could be endangered by the release of the information.¹⁷ The D.C. Circuit disagreed, looking to the plain language of the statute which referenced "any individual," not "any specifically identified individual."¹⁸ The D.C. Circuit found that the government had identified a group of people who were most likely to be at risk if the protocol were to be used during an emergency, such as the threat of a remote detonation of a bomb.¹⁹

that terrorists could use the information in maps to cause flooding and destruction in populated areas); Living Rivers v. U.S. Bureau of Reclamation, 272 F. Supp. 2d 1313, 1322 (D. Utah 2003) (same).

¹⁴ See Raher v. BOP, No. 09-526, 2011 WL 2014875, at *10 (D. Or. May 24, 2011) (concluding that information regarding details of physical structure and security plans of BOP facility was properly withheld under Exemption 7(F) based upon BOP's attestations that disclosure of details "would facilitate escapes, disturbances, and destruction of government property" as well as generally endanger security of prison); see also Pfeffer, No. 89-899, 1990 U.S. Dist. LEXIS 4627, at *4-5 (D.D.C. Apr. 18 1990) (approving withholding of information on smuggling of weapons into prison because "smuggling of weapons into prison could reasonably be expected to endanger the physical safety of some individual").

¹⁵ LaRouche v. Webster, No. 75-6010, 1984 WL 1061, at *8 (S.D.N.Y. Oct. 23, 1984).

¹⁶ 2015 WL 525183, at *1.

¹⁷ Id. at *3.

¹⁸ Id. at *5 (concluding that "Congress contemplated protection beyond a particular individual who could be identified before the fact").

¹⁹ Id. (noting that "the Department does not point to a 'particularized threat to a discrete population,' . . . but rather maintains its non-production falls within Exemption 7(F) because release of [the protocol] would endanger anyone in the United States who happens to be near an unexploded bomb or frequents high value targets").

Additionally, in Living Rivers v. U. S. Bureau of Reclamation, the District Court for the District of Utah held that the Bureau of Reclamation properly withheld inundation maps pursuant to Exemption 7(F) because the information in them could be used by terrorists to damage dams in order to flood populated areas.²⁰ The agency explained that the maps showed information such as "estimated travel times for the flood progression at key locations" as well as "the extent of flooding that would be occasioned by attacking individual features of the dam," thus making the maps a potential "weapon of mass destruction" that could reasonably be expected to endanger the lives of those living downstream from the dam.²¹ When reaching its conclusion that Exemption 7(F) was properly invoked, the court specifically noted that Exemption 7(F) is not limited "to known, named individuals only."²² Since then, the District Court for the District of Columbia has reached the same conclusion and approved the use of Exemption 7(F) to withhold information regarding inundation maps.²³ Citing concerns about public safety and the possible use of the maps for terrorist ends, the court found that the United States Section of the International Water and Boundary Commission properly withheld inundation maps in full.²⁴

In a similarly broad application of the phrase "any individual," Exemption 7(F) has been used to protect information regarding seized contraband and information concerning U.S. Customs' employees involved in the seizure, storage, and evaluation of the contraband.²⁵ Applying Exemption 7(F), the court reasoned that the release of this information could place at risk innocent third parties located in the vicinity of U.S. Customs' officials, activities, or the seized contraband.²⁶ Likewise, Exemption 7(F) was used to protect the company names of private security contractors (PSC) operating in concert with U.S. military forces in Iraq.²⁷ In that case, the court accepted the government's specific "assessment that disclosure of the PSC company names might very well be expected to endanger the life or safety of military personnel, PSC employees, and civilians of Iraq."²⁸

²⁰ See Living Rivers, 272 F. Supp. 2d at 1322.

²¹ Id. at 1321 (quoting agency declaration).

²² Id.

²³ See Pub. Emps., 839 F. Supp. 2d at 328.

²⁴ See id.

²⁵ See Herrick's Newsletter, 2006 WL 1826185, at *8-9.

²⁶ See id. at *9 (citing Garcia, 181 F. Supp. 2d at 378).

²⁷ See L.A. Times, 442 F. Supp. 2d at 898-900.

²⁸ Id. at 900.

By contrast, protection was denied by the Court of Appeals for the Second Circuit in ACLU v. DOD, where the court held that "in order to justify withholding documents under exemption 7(F), an agency must identify at least one individual with reasonable specificity and establish that disclosure of the documents could reasonably be expected to endanger that individual."²⁹ The Second Circuit declined to "shape the precise contours of the exemption," but found that it did not apply to "some unspecified member of a group so vast as to encompass all United States troops, coalition forces, and civilians in Iraq and Afghanistan."³⁰ However, after certiorari was granted, the Supreme Court remanded the case for reconsideration in light of the Department of Homeland Security Appropriations Act of 2010, which bars the release of certain photographs related to the detainment of individuals by the United States Armed Forces.³¹

Finally, although Exemption 7(F)'s coverage is in large part duplicative of that afforded by Exemption 7(C), some courts have found that it is potentially broader in that no balancing is required for withholding information under Exemption 7(F).³² And,

²⁹ ACLU, 543 F.3d at 71 (holding that Exemption 7(F) could not be used to bar disclosure of photographs depicting treatment of prisoners because class of individuals who could reasonably be expected to be endangered by release of the photographs had not been clearly defined). *But see Elec. Privacy Info. Center*, 2015 WL 525183, at *5 (distinguishing ACLU on basis that while "[e]xactly who will be passing near an unexploded bomb when it is triggered somewhere in the United States may often be unknowable beyond a general group or method of approach . . . the critical emergency itself provides a limit").

³⁰ Id.

³¹ *See DOD v. ACLU*, 130 S. Ct. 777 (2009) (remanding lower court decision with instructions to reconsider in light of Section 565 of Department of Homeland Security Appropriations Act of 2010, also known as Protected National Security Documents Act of 2009, Pub. L. 111-83 § 565, 123 Stat. 2142 (2009), which bars release of certain photographs pertaining to "treatment of individuals engaged, captured or detained" by Armed Forces in specified time period).

³² *See Raulerson v. Ashcroft*, 271 F. Supp. 2d 17, 29 (D.D.C. 2002) ("Unlike Exemption 7(C), which involves a balancing of societal and individual privacy interests, 7(F) is an absolute ban against certain information and, arguably, an even broader protection than 7(C)"); Shores, 185 F. Supp. 2d at 85 (stating that Exemption 7(F), while covering material that also may be subject to Exemption 7(C), "does not require any balancing test"); LaRouche, 1984 WL 1061, at *8 (stating Exemption 7(F) was properly asserted after danger to law enforcement personnel was identified); *see also FOIA Update*, Vol. V, No. 2, at 5 ("FOIA Counselor: Questions & Answers"). *But see ACLU v. DOD*, 389 F. Supp. 2d 547, 578 (S.D.N.Y. 2005) (dicta) (rejecting principle that once threat to life or safety is discerned, no balancing is required in Exemption 7(F) analysis).

while courts generally defer to an agency's assessment of harm,³³ courts nevertheless require agency declarations to provide an adequate justification for the withholding.³⁴ In cases where agency declarations are lacking sufficient explanation for the withholding,

³³ See, e.g., Levy v. USPS, 567 F. Supp. 2d 162, 169 (D.D.C. 2008) (concluding agency properly withheld "information given by victims of a hoax involving the deadly anthrax toxin [which] could result in bodily harm or death for those individuals" and deferring to "agency's assessment of danger"); Miller, 562 F. Supp. 2d at 124 (noting that "[w]ithin limits, the Court defers to the agency's assessment of danger"); Garcia, 181 F. Supp. 2d at 378 ("In evaluating the validity of an agency's invocation of Exemption 7(F), the court should 'within limits, defer to the agency's assessment of danger.'" (quoting Linn v. DOJ, No. 92-1406, 1995 WL 631847, at *9 (D.D.C. Aug. 22, 1995))).

³⁴ See, e.g., Raher v. BOP, 2011 WL 2014875, at *10 (granting partial summary judgment in favor of plaintiff because BOP failed to explain how "'staffing patterns,' 'institution operations,' 'offender accountability techniques' and 'institution accountability techniques' raise any security concerns"); Banks v. DOJ, 700 F. Supp. 2d 9, 18 (D.D.C. 2010) (denying agency summary judgment because supporting declaration failed to show "'some nexus between disclosure and possible harm' to . . . third parties") (quoting Linn v. DOJ, No. 92-1406, 1995 WL 631847, at *8 (D.D.C. Aug. 22, 1995)); Lawyers' Comm. for Civil Rights v. Dep't. of the Treasury, No. C 07-2590, 2009 WL 1299821, at *5-6 (N.D. Cal. May 11, 2009) (finding that "[u]nlike the prior" declaration with its "conclusory, unsupported speculation" that failed to provide "court with sufficient information to understand the basis" for withholdings, that current declaration "provides sufficient non-conclusory reasons" and detailed information; thus, agency is "entitled to categorically redact under Exemption 7(F) the identities and other identifying information" from delisting petitions); Hidalgo v. FBI, 541 F. Supp. 2d 250, 256 (D.D.C. 2008) (ordering disclosure of information pertaining to informant where agency has not explained how disclosure "would further endanger [the confidential informant's] life . . . when his identity as an informant is manifest and could not be any clearer"); Long v. DOJ, 450 F. Supp. 2d 42, 80 (D.D.C. 2006) (explaining that agency "offers little more than conclusory assertions" and finding that "[s]uch unsupported speculation cannot serve as a justification for withholding information under Exemption 7(F)"), amended, 457 F. Supp. 2d 30 (D.D.C. 2006), amended further on reconsideration, 479 F. Supp. 2d 23 (D.D.C. 2007) (appeal pending); Homick v. DOJ, No. 98-557, slip op. at 33-34 (N.D. Cal. Sept. 16, 2004) (finding that agency did not meet burden of proving that disclosure could reasonably be expected to cause harm given plaintiff's allegations that individuals whose identities were withheld may have testified at his trial thus eliminating "any justification for withholding their identities"), reconsideration denied, (N.D. Cal. Oct. 27, 2004), appeal dismissed, No. 04-17568 (9th Cir. July 5, 2005); Trupei v. Huff, No. 96-2850, 1998 WL 8986, at *5 (D.D.C. Jan. 7, 1998) (finding agency's assertion "conclusory and not supported with sufficient detail for the Court to determine whether Exemption 7(F) was properly invoked"); Linn v. DOJ, No. 92-1406, 1995 WL 631847, at *9 (D.D.C. Aug. 22, 1995) (finding that agency "has not established even a minimal nexus" between withheld information and harm to persons discussed in file).

courts will sometimes undertake an in camera review to determine whether application of Exemption 7(F) is appropriate.³⁵

³⁵ See, e.g., Quinto, 711 F. Supp. 2d at 8 (concluding that review of documents showed "sufficient nexus between [documents'] disclosure and possible harm to . . . third parties"); Mosby v. Hunt, No. 09-1917, 2010 WL 1783536, at *4 (D.D.C. May 5, 2010) (granting plaintiff's motion for in camera review of redacted memorandum on prisoner transfer because of "apparent paucity of material at issue"); El Badrawi v. DHS, 583 F. Supp. 2d 285, 319 (D. Conn. 2008) (ordering in camera review because agency's "string of cryptic and indefinite possibilities whereby terrorists could piece together . . . abstract information" does not sustain "its burden of demonstrating that the material withheld under Exemptions 7(D), 7(E), and 7(F) is exempt"; explaining that "[e]ven where national security implications are involved, the court must have sufficient information to review the agency's withholdings de novo" (citing Halpern v. FBI, 181 F.3d 279, 295 (2d. Cir. 1999))).