



Exemption 7(F)

Exemption 7(F) of the Freedom of Information Act protects "records or information compiled for law enforcement purposes [the disclosure of which] could reasonably be expected to endanger the life or physical safety of any individual."¹ The Court of Appeals for the District of Columbia Circuit has held that "[d]isclosure need not *definitely* endanger life or physical safety; a reasonable expectation of endangerment suffices."²

Courts have routinely upheld the use of Exemption 7(F) to protect the identities of law enforcement agents.³ While this exemption originally only protected law

¹ [5 U.S.C. § 552\(b\)\(7\)\(F\) \(2018\)](#).

² Pub. Emps. for Env't'l Resp. v. U.S. Section Int'l Boundary & Water Comm'n, 740 F.3d 195, 206 (D.C. Cir. 2014).

³ 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F.3d 534, 552 (6th Cir. 2001) (protecting information about DEA agents); Johnston v. DOJ, 163 F.3d 602 (8th Cir. 1998) (unpublished table decision) (protecting information related to identities of DEA special agents, DEA personnel, local law enforcement personnel, and other third parties); Stahl v. DOJ, No. 19-4142, 2021 WL 1163154, at *5 (E.D.N.Y Mar. 26, 2021) (stating that Exemption 7(F) "prevents disclosure of [prison] staff's names, titles, and responsibilities"); Garza v. U.S. Marshals Serv., No. 16-0976, 2018 WL 4680205, at *17 (D.D.C. Sept. 28, 2018) (holding that DEA agents "constitute the textbook definition of persons who warrant protection under Exemption 7(F)"); Michael v. DOJ, No. 17-0197, 2018 WL 4637358, at *12 (D.D.C. Sept. 27, 2018) (protecting names of arresting agents and under-cover informants); 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 per curiam, 64 F. App'x 787, 789 (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 per curiam, 100 F. App'x 964 (5th Cir. 2004); Moody v. DEA, 592 F. Supp. 556, 559 (D.D.C. 1984) (finding Exemption 7(F) protection appropriate even for retired law enforcement officers). But see Kubik v. BOP, No.

enforcement personnel,⁴ it was later amended⁵ and now protects the safety of "any individual."⁶ As a result, courts have held that Exemption 7(F) can protect the names and identifying information of various individuals, including non-law enforcement federal employees and other third persons in connection with particular law enforcement

10-6078, 2011 WL 2619538, at *11 (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)

⁴ See ACLU v. DOD, 543 F.3d 59, 79 (2d Cir. 2008) (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), cert. granted, vacated & remanded on other grounds, 558 U.S. 1042 (2009).

⁵ See Freedom of Information Reform Act of 1986, Pub. L. No. 99-570, 100 Stat. 3207 (1986).

⁶ 5 U.S.C. § 552(b)(7)(F); see also 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))).

matters,⁷ as well as information about inmates,⁸ private security contractor companies,⁹ and medical personnel.¹⁰ Courts have also upheld the use of Exemption 7(F) to protect

⁷ 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) (finding information properly withheld pursuant to Exemption 7(F) where disclosure "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" (quoting agency's declaration)); Peter S. Herrick's Customs & Int'l Trade Newsl. 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 v. DOJ, 181 F. Supp. 2d 356, 378 (S.D.N.Y. 2002) (protecting "names and/or identifying information concerning private citizens and third parties who provided information" to FBI).

⁸ Yagman v. BOP, 605 F. App'x 666, 667 (9th Cir. 2015) (finding agency properly withheld "full name, prison number, and mailing address" of inmates due to privacy and safety concerns); 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 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).

⁹ L.A. Times Commc'ns, 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, when combined with other known information, endanger life or physical safety of many individuals).

¹⁰ See Stahl, 2021 WL 1163154, at *5-6 (indicating that Exemption 7(F) prevents disclosure of portions of videos that reveal identity of prison staff, including medical personnel); 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, as well as the custodian of records at the medical facility that provided information to agency, would endanger their safety).

the identities of informants and sources.¹¹ Unlike Exemptions 6 or 7(C), no balancing is required for withholding information under Exemption 7(F).¹²

The Court of Appeals for the District of Columbia Circuit has explained that the language of Exemption 7(F) "is very broad," and it upheld its use to protect information beyond mere identities of individuals, finding that inundation maps showing which areas downstream from dams are at risk for flooding fall within Exemption 7(F)'s scope.¹³

¹¹ See, e.g., Hammouda v. OIP, 920 F. Supp. 2d 16, 26 (D.D.C. 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" (quoting agency's declaration)); Fischer v. DOJ, 723 F. Supp. 2d 104, 111 (D.D.C. 2010) (holding that reports of death threats made by plaintiff and other individuals against confidential sources justified FBI's use of Exemption 7(F) to protect identities of FBI sources); Quinto v. DOJ, 711 F. Supp. 2d 1, 8 (D.D.C. 2010) (concluding that release of information pertaining to inmate placement in high security facility 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. U.S. Dep't of Treasury, 570 F. Supp. 2d 749, 786 (E.D. Pa. 2008) (finding agency properly redacted names and personal identifiers of its agents and 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, cooperating witnesses, and other third parties); 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).

¹² See Michael, 2018 WL 4637358, at *12 (finding that "[i]nformation withheld pursuant to Exemption 7(F) is also subject to withholding pursuant to Exemptions 6 and 7(C), although no balancing test is required under Exemption (F)"); Raulerson v. Ashcroft, 271 F. Supp. 2d 17, 29 (D.D.C. 2002) (noting that "[u]nlike 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 v. FBI, 185 F. Supp. 2d 77, 85 (D.D.C. 2002) (stating that Exemption 7(F), while covering material that also may be subject to Exemption 7(C), "does *not* require any balancing test").

¹³ See Pub. Emps. for Env't'l Resp., 740 F.3d at 206 (approving withholding of inundation maps because of concern that terrorists could use the information in maps to cause flooding and destruction in populated areas, causing harm to specified population of individuals within such areas); see also Living Rivers v. U.S. Bureau of Reclamation, 272 F. Supp. 2d 1313, 1321-22 (D. Utah 2003) (holding that Exemption 7(F) is not limited "to known, named individuals only," and 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," making the dams potential "weapon of mass destruction" such that release of the maps could reasonably be expected to endanger the lives of those living downstream from dam (quoting agency's declaration)).

Additionally, information that would tend to identify or estimate the size of Secret Service personnel security details, which could create a risk of harm to agents and those they protect, can be withheld pursuant to Exemption 7(F).¹⁴ Further, due to risks to prison security that disclosure would create, the Exemption has also been used to withhold details of the staffing levels, physical structure, and security plans and procedures of prison facilities.¹⁵ 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."¹⁶ Similarly, Exemption 7(F) was found to validly protect videos showing ballistics tests of certain types of ammunitions.¹⁷

¹⁴ See Citizens for Resp. & Ethics in Wash. v. DHS, No. 20-1400, 2021 WL 950415, at *1, *3-8 (D.D.C. Mar. 12, 2021) (finding number of Secret Service personnel on detail, as well as information such as hotel room rates and amounts paid for meals and expenses during trip, which could be used to imply or predict number of personnel, were properly protected under Exemptions 7(E) and 7(F)).

¹⁵ See Stahl, 2021 WL 1163154, at *5-6 (finding that portions of videos documenting procedures for removing prisoners from their cells, including the types of gear and equipment employed, fall within Exemption 7(F) because "[d]isclosing this information would enable inmates to circumvent the procedures, threatening the BOP's ability to perform them safely," but further finding that portions of videos showing medical staff conducting physical examination and implementing medical treatment do not raise similar concerns); Pinson v. DOJ, 313 F. Supp. 3d 88, 121 (D.D.C. 2018) (finding withholding of "'institution's policies [on] tools and keys'; 'photographs of locks on cell door and hand restraints'; and the 'steps used to resolve major crises in a [BOP] facility'" proper where "disclosure of such information would enable inmates to use the staff's resources against them, allow capable inmates to pick cell locks and hand restraints, and enable individuals to circumvent the staff's techniques in cris[i]s situations . . . thus endangering the life or physical safety of inmates, staff, and the public" (quoting agency's declaration)); Pinson v. DOJ, 236 F. Supp. 3d 338, 369-70 (D.D.C. 2017) (approving withholding of information that would reveal BOP institution staffing levels because this information "'could assist individuals in planning incidents, including assaults, homicides, and escape attempts'" (quoting agency's declaration)); 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 (quoting agency's declaration)).

¹⁶ LaRouche v. Webster, No. 75-6010, 1984 WL 1061, at *8 (S.D.N.Y. Oct. 23, 1984).

¹⁷ See Nat'l Pub. Radio v. FBI, No. 18-3066, 2021 WL 1668086, at *5-6 (D.D.C. Apr. 28, 2021) (concluding that videos are protectable pursuant to Exemption 7(F) because they "portray the [agency's] data-gathering efforts regarding bullets' 'ability to inflict the most effective wound to a human adversary,' [therefore] they could allow nefarious actors to select ammunition

Courts have also approved the use of Exemption 7(F) to withhold information that would put the requester's own safety at risk.¹⁸ Additionally, courts have applied Exemption 7(F) to protect persons from possible harm from a requester who has threatened them in the past, has a violent history, or who has a connection to violent organizations.¹⁹

Further, Exemption 7(F) protection has been found appropriate even when it was not possible to identify the specific individuals whose safety was at risk.²⁰ In Electronic

that would 'inflict greater damage to their intended target [or] law enforcement officer[s] responding to crime scenes'" (quoting agency's declaration)).

¹⁸ See Pinson, 313 F. Supp. 3d at 119-20 (concluding that witness form responses used during plaintiff's referral hearing and records containing discussions of gang and informant activity that could adversely affect plaintiff's safety were properly withheld); see also Mosby v. Hunt, No. 09-1917, 2010 WL 2794250, at *1 (D.D.C. July 15, 2010) (describing BOP's application of 7(F) to protect plaintiff as "novel twist," but approving withholding because "plaintiff does not appear to have waived the protection contemplated by exemption 7(F)"), aff'd per curiam, No. 10-5296, 2011 WL 3240492 (D.C. Cir. Sept. 29, 2011); cf. Sluss v. DOJ, No. 17-00064, 2019 WL 2493447, at *7 (D.D.C. June 14, 2019) (finding that Exemption 7(F) can be used to protect plaintiff, and that plaintiff does not have "the unilateral authority to negate an otherwise applicable exemption" by waiving the risk of disclosure; however, concluding that disclosure of information withheld by agency is appropriate where plaintiff "expresse[d] no concern over his safety," and importantly, where plaintiff's former counsel agreed to serve as custodian of the records, "thereby eliminating the risk of harm to Plaintiff altogether").

¹⁹ See, e.g., Sussman v. U.S. Marshals Serv., 734 F. Supp. 2d 138, 140, 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, where plaintiff was seeking records from agency about himself, and agency had previously conducted threat investigation regarding plaintiff (quoting agency's declaration)); 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, 185 F. Supp. 2d at 85 (approving nondisclosure of names of, and identifying information about, cooperating witnesses when information obtained from one such witness led to plaintiff's murder conviction and "prompted [p]laintiff to attempt to have a member of that witness' family murdered"); 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 [plaintiff] 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"); cf. Stahl, 2021 WL 1163154, at *5-6 (determining that "[a]lthough [the inmate who was the subject of the request] was not the requester . . . [t]he Court cannot ignore that [the inmate] helped orchestrate a terrorist attack that killed six people and sought to kill thousands more . . . [,] has connections to international terrorist organizations [, and] [r]eleasing the names and titles of the staff in the video could reasonably be expected to expose them to retaliation or reprisals").

²⁰ See Elec. Priv. Info. Ctr. v. DHS, 777 F.3d 518, 525 (D.C. Cir. 2015).

Privacy Information Center v. DHS, the Court of Appeals for the District of Columbia Circuit reversed the district court's decision that Exemption 7(F) could not be used to withhold a protocol for disabling wireless communications during critical emergencies.²¹ The lower court had held that the government had not specifically identified individuals who could be endangered by the release of the information.²² The D.C. Circuit disagreed, looking to the plain language of the statute, which referenced "any individual," not "any specifically identified individual."²³ 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.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 and Border Protection's employees involved in the seizure, storage, and evaluation of the contraband.²⁵ Applying Exemption 7(F), the District Court for the District of Columbia 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, one court applied Exemption 7(F) to protect the company names of private security contractors 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 [private security contractors'] company names might very well be expected to endanger the life or safety of military personnel, [private security contractors'] employees, and civilians of Iraq."²⁸

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

²¹ Id. at 520, 522.

²² Id. at 522.

²³ Id. at 525 (concluding that "Congress contemplated protection beyond a particular individual who could be identified before the fact").

²⁴ Id. at 524 (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").

²⁵ See Herrick's Newsl., 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.

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

Finally, while courts generally defer to an agency's assessment of harm,³¹ courts nevertheless require agency declarations to provide an adequate justification for the

²⁹ 543 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 photographs had not been clearly defined), cert. granted, vacated & remanded on other grounds, 558 U.S. 1042 (2009). But see Elec. Priv. Info. Ctr., 777 F.3d at 525 (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 ACLU, 543 F.3d at 71, cert. granted, vacated & remanded on other grounds, 558 U.S. 1042 (2009) (directing lower court 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).

³¹ See, e.g., Gonzalez v. USCIS, 475 F. Supp. 3d 334, 353 (S.D.N.Y. 2020) (finding that "[t]he Government's assessment that disclosure of [specified material] would result in danger to [agency] employees and third parties is entitled to deference in this matter"); Pinson v. DOJ, 396 F. Supp. 3d 66, 83 (D.D.C. 2019) (finding that "there is a reasonable expectation of endangerment" and deferring to the agency's "expertise in assessing the plausible danger"); Sandoval v. DOJ, 296 F. Supp. 3d 1, 20 (D.D.C. 2017) ("[d]eferring to the agency's prediction of harm that could occur to individuals who provided the FBI with information" and finding names appropriately withheld); Pinson v. DOJ, 199 F. Supp. 3d 203, 216-17 (D.D.C. 2016) (giving credit to declaration written "[b]ased on the Bureau's collective experience" and finding appropriate withholding of third party inmate central files even when provided with third party releases because "inmates often are placed in a catch-22: either they are threatened and assaulted if they refuse to provide the information detailed in their Central Files, or they accede and provide that information which could, itself, 'also lead to [their] being threatened or assaulted'" (quoting agency's declaration)); Sanchez-Alaniz v. BOP, No. 13-1812, 2016 WL 1222214, at *7 (D.D.C. Mar. 28, 2016) (noting that "[w]ithin limits, courts defer to the 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 (noting that "[i]n 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))).

withholding.³² In cases where agency declarations are lacking sufficient explanation for the withholding, courts will sometimes undertake an in camera review to determine whether application of Exemption 7(F) is appropriate.³³

³² See, e.g., Nat'l Pub. Radio, 2021 WL 1668086, at *5-6 (granting motion for reconsideration after defendant supplemented its initial "generalized and conclusory" declarations with more reasonably detailed justifications of harms that could be caused by disclosure); Sluss, 2019 WL 2493447, at *7 (finding defendant's declaration insufficient where explanation "devote[d] little attention to explaining the risk of harm [p]laintiff would face from disclosure"); Allen v. BOP, No. 16-0708, 2019 WL 498804, at *7 (D.D.C. Feb. 8, 2019) (rejecting agency's use of Exemption 7(F) when "[t]he declarant does not explain . . . how release of [certain] information pertaining to plaintiff potentially endangers the life or physical safety of any individual"); Kansas ex rel. Schmidt v. DOD, 320 F. Supp. 3d 1227, 1246 (D. Kan. 2018) (denying agency summary judgment, in part, because supporting declaration failed to show how disclosure of information concerning law enforcement financial costs "would put anyone's life or physical safety in danger"); Raher, 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" (quoting agency declaration)); 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, 1995 WL 631847, at *8)); Laws' Comm. for C.R. v. Dep't of the Treasury, No. 07-2590, 2009 WL 1299821, at *5-6 (N.D. Cal. May 11, 2009) (finding that prior declarations contained "conclusory, unsupported speculation" that failed to provide "court with sufficient information to understand the basis" for withholdings, but that current declaration "provides sufficient *non-conclusory* reasons" and detailed information entitling agency to categorically withhold information pursuant to Exemption 7(F)); 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").

³³ See, e.g., Anderson, 806 F. Supp. 2d at 128 (indicating that the Court reviewed withheld information in camera and agreed with agency regarding the application of Exemption 7(F), further noting that "[the Court] is not in a position to second-guess [agency]'s valid assertion that disclosure could reasonably be expected to endanger the life or physical safety of an individual"); 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))).