

# EXHIBIT 13

**From:** Andrew Carboy <[acarboy@carboylaw.com](mailto:acarboy@carboylaw.com)>  
**Sent:** Tuesday, December 23, 2025 9:14:42 PM  
**To:** ServiceECF (Law) <[serviceecf@law.nyc.gov](mailto:serviceecf@law.nyc.gov)>; [FOILAppeal@cityhall.nyc.gov](mailto:FOILAppeal@cityhall.nyc.gov) <[foilappeal@cityhall.nyc.gov](mailto:foilappeal@cityhall.nyc.gov)>; [FOIL@cityhall.nyc.gov](mailto:FOIL@cityhall.nyc.gov) <[foil@cityhall.nyc.gov](mailto:foil@cityhall.nyc.gov)>  
**Subject:** Administrative Appeal FOIL Request #FOIL-2023-002-00733

Please be advised that this administrative appeal of a FOIL denial was served via email on the FOIL Appeal and FOIL Officers of the Mayor's Office on December 12, 2025.

The ten (10) days to respond has elapsed, and we deem the administrative appeal denied.

Law Offices of Andrew J. Carboy LLC  
One Liberty Plaza, Floor 23  
New York, NY 10006  
212 520 7565  
[Acarboy@carboylaw.com](mailto:Acarboy@carboylaw.com)

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**From:** Andrew Carboy <[acarboy@carboylaw.com](mailto:acarboy@carboylaw.com)>  
**Sent:** Friday, December 12, 2025 4:02:28 PM  
**To:** [FOILAppeal@cityhall.nyc.gov](mailto:FOILAppeal@cityhall.nyc.gov) <[FOILAppeal@cityhall.nyc.gov](mailto:FOILAppeal@cityhall.nyc.gov)>; [FOIL@cityhall.nyc.gov](mailto:FOIL@cityhall.nyc.gov) <[FOIL@cityhall.nyc.gov](mailto:FOIL@cityhall.nyc.gov)>  
**Cc:** Matthew McCauley <[mmccauley@thmlp.com](mailto:mmccauley@thmlp.com)>  
**Subject:** Administrative Appeal FOIL Request #FOIL-2023-002-00733



Office of Mayor FOIL Appeal with Exhibits.pdf  
6 MB



Share as a link. Anyone on the internet with this link can access.

Yes



**From:** Andrew Carboy <[acarboy@carboylaw.com](mailto:acarboy@carboylaw.com)>

**Sent:** Friday, December 12, 2025 4:02:28 PM

**To:** [FOILAppeal@cityhall.nyc.gov](mailto:FOILAppeal@cityhall.nyc.gov) <[FOILAppeal@cityhall.nyc.gov](mailto:FOILAppeal@cityhall.nyc.gov)>; [FOIL@cityhall.nyc.gov](mailto:FOIL@cityhall.nyc.gov) <[FOIL@cityhall.nyc.gov](mailto:FOIL@cityhall.nyc.gov)>

**Cc:** Matthew McCauley <[mmccauley@thmlp.com](mailto:mmccauley@thmlp.com)>

**Subject:** Administrative [Appeal FOIL](#) Request #FOIL-2023-002-00733

Law Offices of Andrew J. Carboy LLC

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212 520 7565

[Acarboy@carboylaw.com](mailto:acarboy@carboylaw.com)

**First Name**

andrew

26 characters remaining

**Last Name**

carboy

58 characters remaining

**Email**

acarboy@carboylaw.com

**Subject**

Inquiry about FOIL-2023-002-00733

**Message**

December 23, 2025

Please be advised that we appealed the constructive denial of this FOIL request on December 12, 2025. The appeal was sent to FOILAppeal@cityhall.nyc.gov <foilappeal@cityhall.nyc.gov>; FOIL@cityhall.nyc.gov <foil@cityhall.nyc.gov>. Ten (10) days have elapsed, and we deem the appeal denied.

Andrew Carboy

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/20/2024 at

**From:** ServiceECF (Law) <[ServiceECF@law.nyc.gov](mailto:ServiceECF@law.nyc.gov)>

**Sent:** Tuesday, December 23, 2025 9:18:33 PM

**To:** Andrew Carboy <[acarboy@carboylaw.com](mailto:acarboy@carboylaw.com)>

**Subject:** Proof of service receipt

This email confirms receipt of email and constitutes proof of service at the Office of the Corporation Counsel for the City of New York. Please retain it for your records. Please note that the Office of the Corporation Counsel has accepted service only for the City of New York and entities for which the Law Department is authorized to accept service, including the Mayor and City Agency Heads named in their official capacities. Service of process on any individually named parties has not been accepted.

Documents must be submitted as attachments; linked documents will not be accessed and will not be considered as proper service on the New York City Law Department. All documents submitted after 5:00PM will be considered served on the next business day.

Please be reminded that the Law Department Service Window remains open to accept service of papers on Tuesdays and Thursdays from 9:00 am until 5:00 pm.

Service of process on individuals should continue to proceed in a manner required by applicable law.

**This mailbox is only monitored for service. Please call (212) 356-1140 with any questions or concerns.**

**Law Offices of Andrew J. Carboy LLC**

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(212) 520-7565

**Turken Heath & McCauley LLP**

84 Business Park Drive, Suite 307  
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(914) 363-6355

December 12, 2025

**Records Access Officer**

Christian Rivera  
Office of the Mayor/City of New York  
[FOIL@cityhall.nyc.gov](mailto:FOIL@cityhall.nyc.gov)

**Records Appeals Officer**

Jeffrey Lowell  
Office of the Mayor/City of New York  
[FOILAppeal@cityhall.nyc.gov](mailto:FOILAppeal@cityhall.nyc.gov)

**Re:** Appeal of Denial of Freedom of Information Request  
**Subject Matter:** Preparation For/Response to  
Collapse of World Trade Center, September 11, 2001  
**Request Number Office of Mayor:** FOIL-2023-002-00733

Dear Records Access Officer Rivera and Appeals Officer Lowell:

We represent Phil Alvarez on behalf of his brother, NYPD Detective Luis G. Alvarez, deceased; Benjamin Chevat, Director of 9/11 Health Watch; Karen Klingon, Executrix of the Estate of Robert Klingon (resident of lower Manhattan); Yvonne Baisley, Executrix of the Estate of FDNY Firefighter Robert Fitzgibbon; and Charlotte Berwind, Executrix of the Estate of volunteer firefighter Charles E. Flickinger, Jr.

Pursuant to the Freedom of Information Law (“FOIL”), on September 8, 2023, our clients requested public records from the Office of the Mayor (“Mayor’s Office) concerning the response of the City of New York (“City”) to the September 11, 2001 collapse of the World Trade Center, along with historical documents and disaster preparation materials. **(Exhibit 1)** These public records concern risk assessments made by the City for the reopening of lower Manhattan and public schools in September 2001, and the City’s knowledge of airborne toxic hazards, existing at that time. We also requested documents explaining why the Mayor sought liability protection from toxic exposure claims while the City assured the public that the air was safe.

The Mayor’s Office extended its own time to respond to the request on more than ten (10) occasions. **(Exhibit 3)** By granting itself these FOIL postponements, the Mayor’s Office delayed responding over a span encompassing three September 11<sup>th</sup> anniversaries. We do not yet have a single document from the Mayor.

The following chart summarizes the delays of the Mayor’s Office:

EVENT	DATE
Original 911/Health Watch FOIL Request to Mayor's Office	September 8, 2023
Mayor's Office promises response on or about October 30, 2023	September 8, 2023
Mayor's Office grants itself extension to December 29, 2023	November 1, 2023
Mayor's Office grants itself extension to March 27, 2024	January 2, 2024
Mayor's Office grants itself extension to June 21, 2024	March 28, 2024
Mayor's Office grants itself extension to August 18, 2024	June 26, 2024
Mayor's Office grants itself extension to November 15, 2024	August 20, 2024
Mayor's Office grants itself extension to February 13, 2025	November 28, 2024
Mayor's Office grants itself extension to May 9, 2025	February 18, 2025
Mayor's Office grants itself extension to August 14, 2025	May 12, 2025
Mayor's Office grants itself extension to November 28, 2025	August 19, 2025
Mayor's Office grants itself extension to March 19, 2026	December 1, 2025

(See **Exhibit 3** for all communications from Mayor’s Office concerning the FOIL request)

This serial delay is unreasonable, violating the letter and spirit of New York’s public record access laws, as explained below. Accordingly, we deem the FOIL request denied, and now appeal the constructive denial.

### **The Subject FOIL Request**

Pursuant to the Freedom of Information Law, on September 8, 2023, we requested various records from the Mayor’s Office concerning the response of the City to the September 11<sup>th</sup> attacks, along with historical records and disaster preparation materials. (**Exhibit 1**) In a good faith effort to expedite responses, we edited and reduced our FOIL request (**Exhibit 2**) due to the parallel actions of the New York City Council and the Department of Investigation (“DOI”).

On July 14, 2025, the New York City Council enacted Resolution 560-A (“Resolution 560-A”), directing the DOI, one of the country’s premier investigative agencies, to “conduct an investigation to ascertain the knowledge possessed by mayoral administrations on environmental toxins produced by the September 11, 2001 terrorist attacks on the World Trade Center and to submit a report to the Council thereon.” (**Exhibit 10: Resolution 560-A and Record of Passage**)

The unwillingness of the Mayor’s Office to respond to our FOIL request is among the examples in the supporting legislative record of the City’s resistance to disclosing September 11<sup>th</sup> information. As Resolution 560-A sets forth, reciting the work of 9/11 Health Watch to access the City’s public records:

*Whereas, On September 8, 2023, 911 Health Watch Inc. filed a Freedom of Information Law (FOIL) request seeking documents from several New York City agencies relating to the knowledge possessed by the City on the environmental toxins produced by the attacks and the potential harm posed by these toxins, including documents relating to the testing and cleaning of schools in lower Manhattan and the potential evacuation of neighborhoods in Manhattan and Brooklyn in the aftermath of the attacks; and*

*Whereas, 911 Health Watch Inc. received denials in response to the FOIL request; and*

*Whereas, To date, there has not been a comprehensive investigation by New York City of the knowledge possessed by mayoral administrations on the dangers of the environmental toxins produced by the September 11, 2001 terrorist attacks on the World Trade Center and when this knowledge accrued; now, therefore, be it:*

*Resolved, That the Council of the City of New York, pursuant to section 803 of the New York City Charter, directs the **Department of Investigation to conduct an investigation to ascertain the knowledge possessed by mayoral administrations on environmental toxins produced by the September 11, 2001 terrorist attacks at the World Trade Center and to submit a report to the Council thereon. (Exhibit 10)** (emphasis added)*

As sponsoring Council member Gale Brewer described, “*the legislation is a direct response to the Adams administration’s refusal to release the documents despite requests from members of Congress, advocates, and the media.*” (Exhibit 11)(emphasis added)

As United States Representatives Jerrold Nadler and Dan Goldman explained, following the enactment of Resolution 560-A, multiple mayoral administrations resisted release of the City’s September 11<sup>th</sup> archive, beginning with Mayor de Blasio (**Exhibit 7** at p. 2: 2021 request to **de Blasio Administration**):

For years, we have demanded transparency from the **Adams Administration** about what the **Giuliani** and **Bloomberg Administrations** knew about toxins in the air following 9/11 and when they knew it. We sent multiple letters to the **Adams Administration** requesting the release of critical records, yet each time, they denied our requests. Their lack of a meaningful response denied justice to the thousands of New Yorkers and first responders who continue to deal with or have died from health complications due to the air quality following 9/11.

With the passage of Resolution 560, New York City's Department of Investigation has the power to discover exactly what Mayor Giuliani knew about the toxins in the air after 9/11 while claiming it was safe for New Yorkers to return.

These records could provide long overdue accountability for potentially devastating decisions that cost thousands of lives. New Yorkers deserve the truth. We're finally about to get some answers. (**Exhibit 12:** July 15, 2025 Statement of Representatives Nadler and Goldman on passage of Resolution 560-A: "*Representatives Nadler and Goldman Applaud NYC Council for Forcing City to Finally Release the Truth About 9/11 Air Toxins*")

We are not withdrawing our FOIL request; however, in an effort to streamline and expedite the response of the Mayor's Office, in view of the DOI investigation, we edited and reduced it, as set forth at **Exhibit 2**.

As modified/amended, we withdraw requests 3, 4, 5b. and 6 through 28. We seek responses to the following requests, only (original items at request numbers 1, 2 and 5a, c, d, and e):

1. October 2001 memorandum from Deputy Mayor Robert M. Harding referenced in May 14, 2017 New York Times article entitled, "*Ground Zero Illnesses Clouding Giuliani's Legacy.*" ("Harding memo")
2. Underlying documents, studies, reports, assessments, memoranda, factual bases and other written information that informed the Harding memo's estimate or projection of anticipated future claims from WTC toxic exposure.
5. With respect to the following provision of the *Air Transportation Safety and System Stabilization Act of 2001*, Pub. L. No. 107-42, 115 Stat. 230 (2001): **(3) Limitations on liability for New York City.**--*Liability for all claims, whether for compensatory or punitive damages or for contribution or indemnity arising from the terrorist-related aircraft crashes of September 11, 2001, against the City of New York shall not exceed the greater of the city's insurance coverage or \$350,000,000. 49 U.S.C.A. § 40101*
  - a. Written communications, dating from September, October and November 2001, such as correspondence, email, and memoranda, with all attachments, concerning limitations on liability for the City of New York ("City"), to the following individuals and offices:
    - i. The White House and the Office of the Executive;
    - ii. Any United States Senator and their office;
    - iii. Any Committee of the United States Senate and/or its staff;
    - iv. Any member of the U.S. House of Representatives or their staff;
    - v. The United States Justice Department; and
    - vi. United States Environmental Protection Agency.

c. Documents setting forth the names of consultants and consulting firms, lobbyists and lobbying firms, that worked with the City in the effort to secure the limitations on liability, referenced above.

d. Documents setting forth the amount of compensation issued/paid by the City to the consultants and consulting firms, lobbyists and lobbying firms identified in response to request c., above.

e. Documents setting forth: the number of meetings (taking place in September, October and November 2001), dates of meetings, location of meetings, identity of those in attendance, concerning the efforts to secure the limitations on liability, set forth above, along with summaries of meetings and copies of the written materials reviewed at each meeting.

Requests numbered 3, 4, 5b. and 6 through 28 (**Exhibit 1**) are withdrawn.

Even so, the Mayor's Office is unable or unwilling to respond to our abridged request (**Exhibit 2**), notwithstanding renewed attention from the City Council, Congress, and, of course, the DOI investigation.

### **Without Justification, the Mayor's Office Postpones Responding Since 2023**

Rather than respond by producing *any* documents for review (not one page, to date), the Mayor's Office granted itself a series of postponements (known as "extensions" in FOIL parlance) spanning more than *two years* and three September 11<sup>th</sup> anniversaries. (**Exhibit 3**)

The Mayor's Office announced the postponements, ten (10) in total, via the City's FOIL portal, using the following template language:

The Mayor's Office (OOM) has **extended** the time to respond to your FOIL request FOIL-2023-002-00733 for the following reasons:

*You can expect a response on or about Thursday, March 19, 2026.*

*Additional Information: Due to the volume of requests that we have received, we are extending the due date on this request.*

**(Exhibit 3: Mayor's Office December 1, 2025 FOIL extension, its tenth [10<sup>th</sup>])**

Other than citing a volume of other, unrelated FOIL requests, the Mayor's Office provides zero justification for the delay. This cursory explanation, devoid of detail, is not an appropriate basis for a single FOIL response extension, let alone ten (10) of them.

The two-plus year delay in responding is unreasonable. The Freedom of Information Law itself directs the response of the Mayor's Office within five (5) business days of the request, not thirty (30) months later (September 2023 to March 2026) or even longer:

3. (a) Each entity subject to the provisions of this article, within **five business days** of the receipt of a written request for a record reasonably described, shall make such record available to the person requesting it, deny such request in writing or furnish a written acknowledgement of the receipt of such request and a statement of the approximate date, which shall be reasonable under the circumstances of the request, when such request will be granted or denied, including, where appropriate, a statement that access to the record will be determined in accordance with subdivision five of this section. **N.Y. Pub. Off. Law § 89** (McKinney)(emphasis added)

If the five-day window is too brief, the FOIL statute requires the Mayor's Office to provide a statement of the approximate date for production, one "*reasonable under the circumstances.*" Id.

By designating ten different future dates for a response, and then failing to meet any of these self-extended deadlines over the course of more than two (2) years, the Mayor's Office has provided no semblance of an actual timeframe or date for document production, a violation of FOIL.

None of the adjourned dates has been demonstrated to be reasonable, realistic or reliable. The Mayor's Office simply disregards the next date that it selected, and hits "reset," generating an additional, future response point. With the latest "reset" to an illusory March 2026 date, the outgoing Mayor punts the ultimate responsibility for release of the City's September 11<sup>th</sup> archive to Mayor-elect Mamdani.<sup>1</sup> These years of delay are particularly troubling given the recent pledge by his office that Mayor Adams remains "***dedicated to getting 9/11 victims and their families the answers they need.***" (Source: ABC News, November 25, 2025: "*FDNY Members Want Answers after Discovery of Documents about 9/11 Toxins,*" covering the City DEP's belated "discovery" of 68 boxes of records responsive to 9/11 Health Watch's FOIL request, after years of denying their existence and requesting dismissal of the ensuing Article 78 proceeding) <https://abc7ny.com/post/fdny-union-leaders-demand-answers-discovery-documents-911-toxins-ground-zero/18202801/>

Accordingly, the Mayor's Office constructively denied our clients' FOIL request.

New York State Supreme Court condemns this precise type of conduct in responding to FOIL requests, even when the extensions span a far shorter period of time. This is particularly so

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<sup>1</sup> This appeal is filed within thirty (30) days of this constructive denial.

when the subject matter, as here, is of great public importance, the request is specific, and the data is known to be stored and organized. See, e.g., Empire Ctr. for Pub. Pol'y v. New York State Dep't of Health, 150 N.Y.S.3d 497, 499 (N.Y. Sup. Ct. 2021)(*Two-month* delay caused by New York State's self-extension deemed unreasonable as petitioner's request for Covid-19 nursing home death records was narrowly tailored and data was organized/compiled, previously)

If records are clearly available to the public under the Freedom of Information Law, or if they are readily retrievable, there may be no basis for a lengthy delay in disclosure. (**Exhibit 4:** N.Y. State Commission on Open Government, 1998 Advisory Opinion 10833)

Although FOIL does allow a government agency to extend response times, unilaterally, this privilege is limited to appropriate circumstances, absent here. The postponements are not to be indefinite, and the Mayor's Office abuses the extensions in this instance.

Accordingly, it has long been advised that when an agency is unable to deny or provide access to records within five business days, it must provide a written response indicating either that it will respond within the next twenty business days, or that it is unable to respond until a certain date, providing both the date and the reasons for requiring additional time. Although we recognize that there are occasions when an agency will require an extension of time beyond that which it initially predicted, ***there is no provision in the statute for repeated extensions.*** (**Exhibit 5:** N.Y. State Commission on Open Government, 2016 Advisory Opinion 19372)(emphasis added)

In McKenna v. The City of New York, the New York Supreme Court deemed unreasonable the City's six (6) self-granted extensions. Unlike the Mayor's Office, granting itself **2.5 years** to respond (through 10 extensions), the City in McKenna sought only **six months** of additional time. Yet, even that shorter period, one-fifth of the time at issue in this matter, violated FOIL. (**Exhibit 8:** 2024 NY Slip Op 33137(U), August 26, 2024) "*From March 2, 2022, through September 21, 2022, Respondent extended the expected response date six times.*")

As *Reinvent Albany* reported earlier in 2025, New York City responds to 84% of FOIL requests, annually. That 16% are not responded to within one year is deemed a failure by the non-profit government watchdog. ([Report: New York City Government Flouting Freedom of Information Law - Reinvent Albany](#)) What would *Reinvent Albany* make of a government records request, concerning a matter of paramount public interest, taking more than 2.5 years to address?

## **Indicia that the Mayor's Office Played a Leading Role in the September 11<sup>th</sup> Response and Organized the Requested Information more than Two Decades Ago**

The September 11<sup>th</sup> attack and collapse of the World Trade Center remain the most significant events in New York City history.

As is widely known, the Mayor's Office played a lead role in the response. [See, e.g., In re World Trade Ctr. Disaster Site Litig., 456 F. Supp. 2d 520, 527, 2006 WL 2948819 (S.D.N.Y. 2006), *aff'd in part, appeal dismissed in part*, 521 F.3d 169, 2008 WL 783386 (2d Cir. 2008): "*the Mayor of the City of New York... issued a Mayoral Order on September 11, 2001, proclaiming a local state of emergency based on the danger to public safety posed by the attacks*" and directing local agencies "*to take whatever steps are necessary to preserve the public safety and...to protect the security, well-being and health of the residents of the City*"]

The Mayor, too, worked to secure liability protections for the City in the aftermath. As a United States District Court observed, "*a November 1, 2001 letter sent by then-Mayor Giuliani to members of the New York congressional delegation urg[ed] adoption of amendments that would limit the City's liability. ... the proposed amendment would alleviate only "part" of "the City's potential liability exposure."*" In re WTC Disaster Site, 414 F.3d 352, 379, 2005 WL 1649041 (2d Cir. 2005)

Deputy Mayor Robert Harding received a memo entitled Legislative Alternatives to Limit the City's Liability relating to 9/11/01. According to the memo, as of Fall 2001, "*the Law Department was estimating 35,000 potential 9/11 plaintiffs against the City...the memo urged the city to push Congress to create a fund to cover the City's liability similar to the 9/11 Victim Compensation Fund it had just created for the airline industry.*" (**Exhibit 9: Grand Illusion**, Barret and Collins, 2006, at p. 259, chapter 8, footnote 13)

For these reasons, our FOIL request sought information concerning the City's lobbying and legislative efforts to eliminate/reduce its potential liabilities for toxic exposure claims, including the so-called "Harding memo" and its communications with federal agencies, Congress, and the White House. (**Exhibits 1 and 2**)

The Mayor's myriad pronouncements as to air quality and safety in lower Manhattan are well-known to anyone who heard or read them in September 2001. We sought the bases for these proclamations and the decision to reopen public schools and businesses, undertaken simultaneously with the City's aggressive lobbying for protection from lawsuits arising from exposure to the toxic air, downtown. (**Exhibits 1 and 2**)

We demonstrate that the requested materials remain readily available.

The Mayor's Office, like all City agencies and departments received a special 2002 directive from the City Law Department's "World Trade Center Unit," a task force addressing

September 11<sup>th</sup>-related issues.<sup>2</sup> (**Exhibit 6**) Without any qualification or limitation, the World Trade Center Unit instructed the Mayor's Office to identify and preserve all documents concerning its response to the WTC collapse. In 2002, the World Trade Center Unit advised the Mayor's Office, as follows:

*These original World Trade Center documents have been collected and scanned by the New York City Law Department. **DO NOT DISPOSE OF THESE DOCUMENTS:** they must be preserved to serve as evidence in the event future WTC-related legal actions are brought against the City. (**Exhibit 6** at 2002 Preservation Letter)(Original emphasis)*

In accordance with the Law Department's directive, the Mayor's Office would have compiled and organized World Trade Center documents. Thereafter, upon scanning by the Law Department, the documents were returned with the admonition for the Mayor's Office to preserve them, indefinitely.

There is further and more contemporaneous indication that the documents exist, are organized, accessible and easily provided. The Mayor's Office cannot argue that it no longer has the documents or that the documents do not exist, the precise tactic employed by the City Department of Environmental Protection to fight our FOIL request as to it. ([ViewDocument](#))

Communications with New York's Congressional delegation, dating from 2021, also confirm that the requested materials are catalogued and set aside. Annexed as **Exhibit 7** are a series of letters between Honorable Jerrold Nadler, Honorable Dan Goldman, and Honorable Caroline Maloney and the Office of the Mayor. Since 2021, the Representatives have sought previously unreleased documents, from City agencies, concerning the response to the September 11th attacks, writing and meeting with the Mayor's Office in this effort. To date, the City has not responded in any meaningful way to these requests from the elected officials. On March 22, 2023, *Mayor Adams wrote to the members of Congress, acknowledging that such previously unreleased documents existed, but advising that they would not be disclosed.* The Mayor cited "litigation risks" as a barrier. The Mayor requested both federal funding and additional federal protections for the City before the documents would be released. *Id.* At no point in the correspondence to the Congressional delegation did City Hall cite a specific FOIL exemption enabling it to withhold the documents. Further, "litigation risks" are not recognized as a basis to deny Petitioners' FOIL request or those of members of Congress.

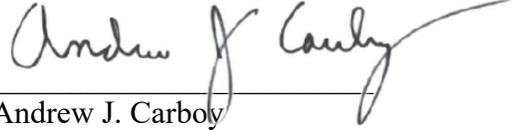
Accordingly, it is clear that the current Mayor's Office is not only aware of the existence of specific and responsive records, it has set these records aside, siloed them, and continues to resist their disclosure.

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<sup>2</sup> At inception, the World Trade Center Unit had twenty-five attorneys, seventeen support members, including private investigators, and a large complement of legal assistants and data entry clerks. The unit operated for more than one decade. (**Exhibit 6** at press release)

We respectfully request that the FOIL denials be reversed in their entirety and the subject FOIL request (**Exhibit 2**) be granted, immediately and in full.

Very truly yours,

A handwritten signature in cursive script that reads "Andrew J. Carboy". The signature is written in black ink and has a long, sweeping tail that extends to the right.

---

Andrew J. Carboy

A handwritten signature in cursive script that reads "Matthew McCauley". The signature is written in black ink and is more compact than the one above.

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Matthew McCauley