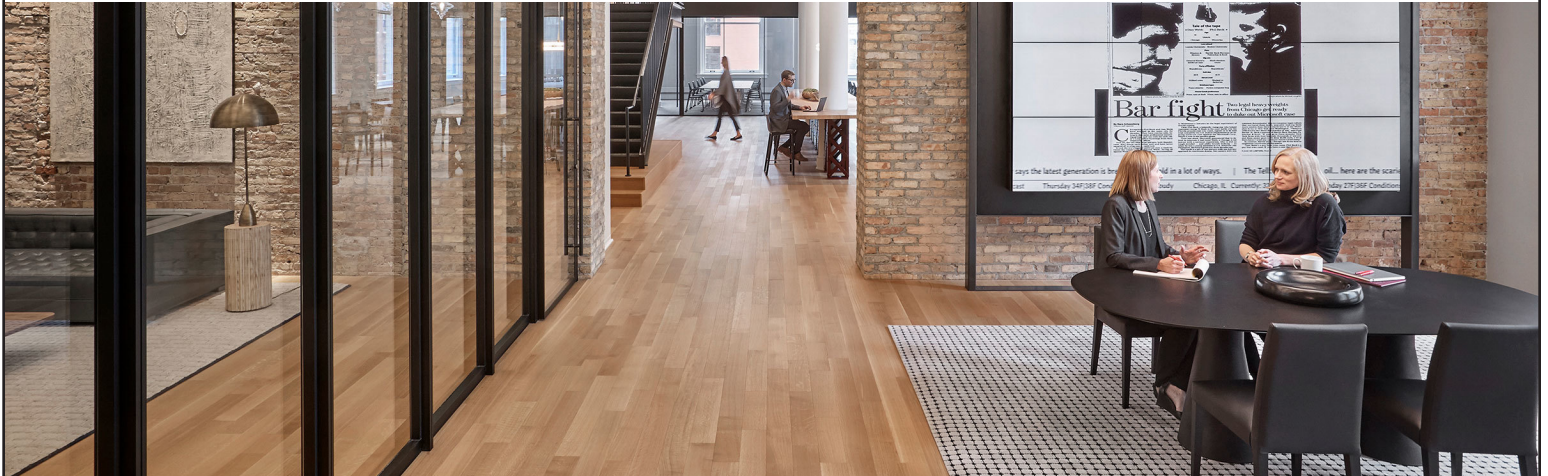

TAKING TOUHY TOO FAR: WHY IT IS IMPROPER FOR FEDERAL AGENCIES TO UNILATERALLY CONVERT SUBPOENAS INTO FOIA REQUESTS



2011 (Note)