

[REDACTED] prohibits any "officer, employee or agent . . . from disclosing to any person that the FBI has sought or obtained access to information or records under these provisions."

3. I am currently employed as the [REDACTED] of the [REDACTED] in [REDACTED]. I have been the [REDACTED] of the [REDACTED] [REDACTED] for [REDACTED] years. I have been a librarian for [REDACTED] years.

4. I received a Master's in Library Science from the [REDACTED] in [REDACTED].

5. I have been an active member of the Connecticut Library Association ("CLA") for [REDACTED] years. The CLA is a chapter of the American Library Association ("ALA"). I served as the [REDACTED] of the CLA from [REDACTED]. I also served a [REDACTED] term as the [REDACTED] of the [REDACTED] of the CLA from [REDACTED]. During my terms as [REDACTED] and [REDACTED] of the Connecticut Library Association, I regularly spoke out about and challenged policies endangering the intellectual freedom of libraries. In [REDACTED] I was honored with a Roll of Honor award from the National Freedom to Read Foundation. In addition, as the [REDACTED] it was my responsibility to communicate with state legislators about the importance of intellectual freedom in the library context. It was also my responsibility to lobby for increased protection of the privacy of library patrons and their records.

6. I currently serve as the [REDACTED] of the [REDACTED] of CLA. I have held this position for [REDACTED] years. My duties and responsibilities include keeping the [REDACTED] library community and the general public informed about intellectual freedom issues affecting both [REDACTED] and the nation. For example, I

During the course of the litigation, the government tried to redact information that had already been unsealed and available to the public. The highlighted text below shows public information the government unsuccessfully tried to re-redact.

regularly plan and participate in events and programs on important intellectual freedom issues, including the relationship between the government and libraries. As the [REDACTED] of the [REDACTED], it is also my duty and responsibility to speak out about any infringement to the intellectual freedom of libraries of which I have knowledge.

7. I am currently also [REDACTED] for CLA; I have held this position for over [REDACTED] years. Under this program every state legislator in [REDACTED] is matched with a [REDACTED] librarian serving as a [REDACTED]. It is the job of [REDACTED] to inform their legislator about any legislative concerns facing their local library communities. As a [REDACTED] it is my duty to educate and lobby state legislators in my community about issues impacting libraries in general and intellectual freedom issues in particular. For example, every year the [REDACTED] sponsor a Legislative Breakfast attended by state legislators where we present a docket of the most significant legislative issues facing our state libraries. This year's docket highlighted laws protecting the privacy of patron records. I advocated for a revision to the [REDACTED] state statute protecting the confidentiality of library records to clarify that privacy protections apply to all library records, not just circulation records. In particular, I advocated for privacy protection for computer records, including Internet records. As a [REDACTED] argued that the laws protecting the privacy of both patron Internet and computer records and reading records needed to be strengthened in order to preserve the democratic function of libraries in our society.

8. In addition, it is my duty and responsibility as [REDACTED] of the Intellectual Freedom Committee to serve as a liaison between the [REDACTED] library

discussions, both formal and informal, with other librarians and members of my community about challenges to the intellectual freedom of libraries. For example, as part of a [REDACTED] exchange Program, I travel to libraries in other localities to speak with library staff and trustees about threats to the intellectual freedom of libraries. In addition, I routinely participate in panels and debates on this issue. For example, in [REDACTED] I was a panelist in a discussion sponsored by the [REDACTED]. The presentation was entitled [REDACTED]. As part of this panel, I debated U.S. Attorney Kevin O'Connor over the appropriateness of the Patriot Act and its application to libraries.

11. I had no knowledge of the NSL provision of the Patriot Act until [REDACTED] [REDACTED] was served with the NSL at issue in this case. I have never heard the NSL power discussed in any of the many forums relating to intellectual freedom and libraries I have attended. I did not know that a library could be construed as an "electronic communications service provider" under the NSL statute, or that the FBI could use NSLs to demand sensitive information about library patrons. To the best of my knowledge, the existence of the NSL provision and its applicability to libraries is not generally known within the library community. Now that I know about the NSL power, the gag is preventing me from educating my own library, CLA, ALA, and other libraries and library associations about the NSL power and the threat that it poses to the privacy of library patrons.

12. But for the gag, I would inform the staff and trustees of the library I direct, [REDACTED], that [REDACTED] had been served with an