

## **Responding to ICE Demands for Records: Best Practices for State and Local Labor Standards Enforcement Agencies**

The Trump Administration has threatened to investigate and prosecute state and local officials for “resisting, obstructing, and otherwise failing to comply with lawful immigration-related commands or requests.”<sup>1</sup> While the claims made in the memorandum are legally dubious--the Supreme Court has specifically held that “[t]he federal government . . . may not compel the States to enact or administer a federal regulatory program,”<sup>2</sup> state and local labor enforcement agencies should nonetheless develop a policy for responding to requests and demands from U.S. Immigration and Customs Enforcement (ICE) and other federal agencies enforcing immigration policies to ensure compliance with all applicable laws.

### **Distinguishing Between ICE’s Various Tools for Demanding Information**

ICE and other federal agencies enforcing immigration policies deploy multiple tools to obtain information through document requests, interviews, searches, and detention and arrest. These tools include administrative warrants, judicial warrants, administrative subpoenas, and requests for information. The table below provides an overview of these documents and what they do—and do not—require. Understanding the different types of subpoenas and warrants is critical because each document type requires an individualized response.

---

<sup>1</sup> <https://www.nytimes.com/2025/01/22/us/politics/justice-department-immigration-enforcement.html>

<sup>2</sup> *Printz v. United States*, 521 U.S. 898, 926 (1997) (quoting *New York v. United States*, 505 U.S. 144, 188 (1992)).

	<b>Judicial Warrant<sup>3</sup></b>	<b>Administrative Warrant<sup>4</sup></b>	<b>Judicial Subpoena<sup>5</sup></b>	<b>Administrative<sup>6</sup> Subpoena</b>	<b>Request for Information</b>
<b>What is it?</b>	A formal written order authorizing a law enforcement officer to make an arrest, seizure, or search	A formal written document authorizing a law enforcement officer from a designated federal agency (e.g. ICE/DHS) to make an arrest or seizure.	A formal written order signed by a district court judge or a state judge directing a person to compel: (1) his/her/their testimony as a witness in court or in a deposition; or (2) the production of evidence	Issued and signed by a federal agency to compel a person or entity to testify as a witness in an investigation or produce evidence	A written or verbal request for information from a state or federal agency.
<b>Signed By Agency</b>	No	Yes, a federal agency such as DHS or ICE issues administrative warrants that can be signed by either an “immigration judge” or an “immigration officer”	No	Yes	No
<b>Signed By a State or Federal Judge</b>	Yes, signed by a district court judge or a state judge (not an immigration judge)	No	Yes	No	No
<b>Self-Enforcing</b>	Yes, failure to comply can result in a contempt of court	No	Yes, issued by a judicial court with serious consequences for failing	No, immigration agencies cannot enforce their own administrative	No

<sup>3</sup> Appendix A (sample).

<sup>4</sup> Appendix B (sample).

<sup>5</sup> Appendix C (sample).

<sup>6</sup> Appendix D (sample).

	order		to comply, e.g. punishment for being found in contempt of court.	subpoenas. This means that if a state or local entity chooses not to appear or produce certain documents without a judicial subpoena, the entity that issued the subpoena, for example, the immigration agency (ICE, CBP, or USCIS) or an immigration judge can seek an order from a U.S. district court to enforce the administrative subpoena <sup>7</sup>	
<b>Limitations</b>	--	Does not authorize a search	--	Does not permit immigration agencies to conduct an inspection.  Its scope, purpose, and reasonableness can be challenged in federal court	A request for information is not signed by a federal judge, immigration judge, or immigration officer and cannot on its own compel or order a response.

<sup>7</sup> This is called a subpoena enforcement action. In response, the state or local agency can challenge the administrative subpoena. The Supreme Court has ruled that an immigration subpoena may not be overbroad in scope, irrelevant and improper in purpose, or ambiguous such that compliance is unreasonably burdensome. *See v. City of Seattle*, 387 U.S. 541, 544 (1967) (“[T]he subpoena [must] be sufficiently limited in scope, relevant in purpose, and specific in directive so that compliance will not be unreasonably burdensome”).

The National Immigration Law Center has an excellent resource, [“WARRANTS AND SUBPOENAS: What to Look Out for and How to Respond”](#) that explains the differences between these documents and how to identify them, including sample documents.

**One key difference between a judicial subpoena and an ICE subpoena is that a judicial subpoena is signed by a federal judge and not by an immigration judge/the immigration agency.**

Workplace Justice Lab has created a **detailed checklist** on continuing to protect immigrant workers’ labor rights that includes information about how agencies can prepare for an ICE subpoena (starting on page 6). The following steps provide a high-level overview of the checklist.

**1. Create a protocol and policy to respond to federal demands for records and entry, including administrative and judicial subpoenas.** At a minimum, the policy should:

- Clarify agency policies around identifying and responding to records requests, subpoenas, and warrants;
- Specify proper service under applicable law (e.g. must papers be served to a specific person or address);
- Identify who is authorized to accept service for the agency and, the agency’s custodian of records;
- Develop scripts and instructions that are specific to your agency and public-facing staff and spaces;
- Identify the agency’s legal counsel and ensure that all staff, including public-facing staff, knows how to contact the agency’s legal counsel, and that counsel has a plan for rapidly responding to staff who have received demands or requests from ICE;
- Include a process and instructions for staff to verify the type of document ICE presented to the agency before responding to ensure that the request and your agency’s response is lawful ;and
- Outline a process for consulting with lawyers to evaluate the ICE’s demands and provide advice, including whether the subpoena or warrant was properly served, the information requested in the subpoena is

reasonable and relevant; state or local laws are implicated in the release of certain information; and the agency even has the information requested. Lawyers should work with the agency to evaluate next steps.

- 2. Create and implement training on protocols.** Develop and implement training for staff on protocols and policies for responding to federal demands for records and entry. Remind employees that they should not *create* records in response to an administrative subpoena, judicial subpoena, or request for information.

### **California's Model Policy**

The California Office of the Attorney General has created a detailed, publicly available protocol "[Guidance and Model Policies to Assist the Division of Labor Standards Enforcement, the Agricultural Labor Relations Board, and the Division of Workers Compensation in Responding to Immigration Enforcement](#)", includes a model policy, reproduced below, for labor agencies that is very helpful:

#### **Model Policies for Responding to Immigration Enforcement Activities at Labor Agency Facilities and Written Requests**

- ▶ In the event of an in-person visit by an officer engaged in immigration enforcement to [Labor Agency] facilities, [Labor Agency] staff shall immediately ask the officer to leave the premises immediately because their presence is disruptive to the agency's business and report the presence of the officers to a supervisor. The supervisor should contact [designated administrator or staff counsel]
- ▶ [Labor Agency] staff should allow [designated administrator or staff counsel] to interact directly with the officer. While waiting for the designated staff counsel or administrator, or if neither is available, [Labor Agency] staff shall take the following actions:

1. Advise the officer that before proceeding with any request, staff must notify [designated administrator or staff counsel] to follow up with the officer;
2. Ask to inspect, and make a copy of or note, the officer's credentials (i.e., name and badge number). Also ask for and copy or note the phone number of the officer's supervisor;
3. Ask the officer to explain the purpose of the officer's visit, and document the response;

4. Ask the officer to produce any documentation that authorizes access to [Labor Agency] facilities;
5. Make a copy of all documents provided by the officer;
6. Decline to answer questions posed by the officers and direct the officer to speak to a [Labor Agency] supervisor or designated staff counsel;
7. State that [Labor Agency] does not consent to entry into [Labor Agency] facilities or portions thereof;
8. Without expressing consent, respond based on the documentation provided that purports to authorize the request. If the officer has:
  - An ICE administrative “warrant”: Immediate compliance is not required. Inform the officer that [Labor Agency] cannot respond to the warrant until after it has been reviewed by legal counsel. Provide copy of the warrant to [designated administrator or staff counsel] as soon as possible.
  - A notice to appear : This document is not directed at [Labor Agency’s] facility. [Labor Agency] staff is under no obligation to deliver or facilitate service of this document to the person named in the document. If you receive a copy of the document, give it to [designated administrator or staff counsel] as soon as possible.
  - A federal judicial warrant (either a search-and-seizure warrant or an arrest warrant): Prompt compliance usually is required, but where feasible, staff should consult with legal counsel before responding.
  - A subpoena for the production of documents or other evidence. Immediate compliance is not required. Inform the officer that [Labor Agency] cannot respond to the subpoena until after it has been reviewed by legal counsel. Provide a copy of the warrant to legal counsel as soon as possible.
9. If the officer orders staff to provide immediate access to facilities, [Labor Agency] staff should not refuse the officer’s order and immediately contact [designated administrator or staff counsel]. Do not attempt to physically interfere with an officer, even if the officer appears to be acting without consent or exceeding the purported authority provided by a warrant or other document;
10. Document the officer’s actions in as much detail as possible when they enter [Labor Agency] premises, but without interfering with the officer’s movements; and

11. Complete an incident report that includes the information gathered or described above and the officer's statements and actions.

# APPENDIX A

## UNITED STATES DISTRICT COURT

for the

In the Matter of the Search of  
*(Briefly describe the property to be searched  
or identify the person by name and address)*

)  
)  
)  
)  
)  
)

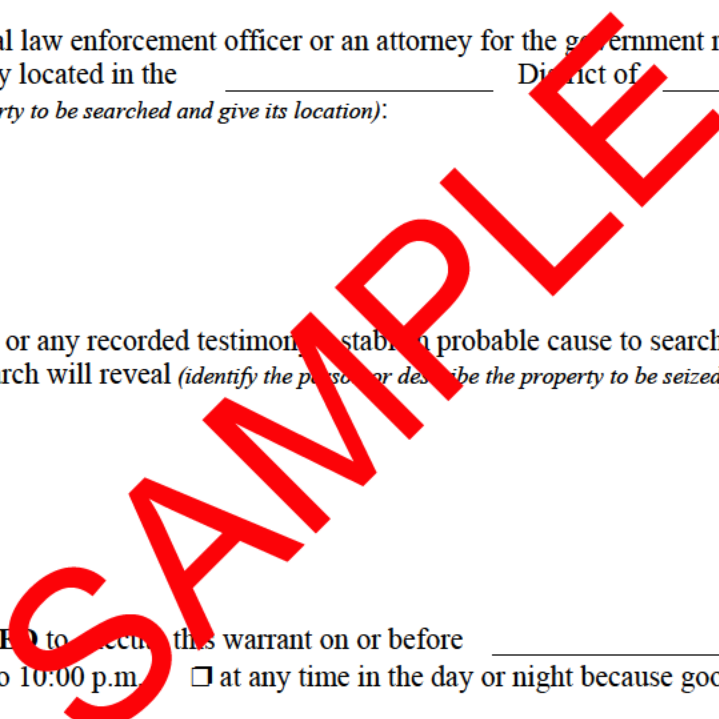
Case No.

### SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the \_\_\_\_\_ District of \_\_\_\_\_  
*(identify the person or describe the property to be searched and give its location):*

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal *(identify the person or describe the property to be seized):*



**YOU ARE COMMANDED** to execute this warrant on or before \_\_\_\_\_ *(not to exceed 14 days)*  
 in the daytime 6:00 a.m. to 10:00 p.m.  at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to \_\_\_\_\_  
*(United States Magistrate Judge)*

Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized *(check the appropriate box)*

for \_\_\_\_\_ days *(not to exceed 30)*  until, the facts justifying, the later specific date of \_\_\_\_\_

Date and time issued: \_\_\_\_\_

\_\_\_\_\_  
*Judge's signature*

City and state: \_\_\_\_\_

\_\_\_\_\_  
*Printed name and title*



**Return**

Case No.:

Date and time warrant executed:

Copy of warrant and inventory left with:

Inventory made in the presence of :

Inventory of the property taken and name of any person(s) seized:

**SAMPLE**

**Certification**

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Executing officer's signature*

\_\_\_\_\_  
*Printed name and title*

Print

Save As...

Reset

# APPENDIX B

U.S. DEPARTMENT OF HOMELAND SECURITY

Warrant for Arrest of Alien

File No. \_\_\_\_\_

Date: \_\_\_\_\_

**To: Any immigration officer authorized pursuant to sections 236 and 287 of the Immigration and Nationality Act and part 287 of title 8, Code of Federal Regulations, to serve warrants of arrest for immigration violations**

I have determined that there is probable cause to believe that \_\_\_\_\_ is removable from the United States. This determination is based upon:

- the execution of a charging document to initiate removal proceedings against the subject;
- the pendency of ongoing removal proceedings against the subject;
- the failure to establish admissibility subsequent to deferred inspection;
- biometric confirmation of the subject's identity and a records check of federal databases that affirmatively indicate, by themselves or in addition to other reliable information, that the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law; and
- statements made voluntarily by the subject to an immigration officer and/or other reliable evidence that affirmatively indicate the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law.

**YOU ARE COMMANDED** to arrest and take into custody for removal proceedings under the Immigration and Nationality Act, the above-named alien.

\_\_\_\_\_  
(Signature of Authorized Immigration Officer)

\_\_\_\_\_  
(Printed Name and Title of Authorized Immigration Officer)

### Certificate of Service

I hereby certify that the Warrant for Arrest of Alien was served by me at \_\_\_\_\_  
(Location)

on \_\_\_\_\_ on \_\_\_\_\_, and the contents of this  
(Name of Alien) (Date of Service)

notice were read to him or her in the \_\_\_\_\_ language.  
(Language)

\_\_\_\_\_  
Name and Signature of Officer

\_\_\_\_\_  
Name or Number of Interpreter (if applicable)

# APPENDIX C

UNITED STATES DISTRICT COURT  
for the

\_\_\_\_\_) )  
Plaintiff )  
v. ) Civil Action No. )  
\_\_\_\_\_) )  
Defendant )

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To:

\_\_\_\_\_  
(Name of person to whom this subpoena is directed)

**Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

Place:	Date and Time:
--------	----------------

**Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
--------	----------------

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: \_\_\_\_\_

CLERK OF COURT

OR

\_\_\_\_\_  
Signature of Clerk or Deputy Clerk

\_\_\_\_\_  
Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) \_\_\_\_\_, who issues or requests this subpoena, are:

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_

on *(date)* \_\_\_\_\_.

I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_

\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:

Print

Save As...

Add Attachment

Reset

## Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

### (c) Place of Compliance.

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

### (d) Protecting a Person Subject to a Subpoena; Enforcement.

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

**(A) Appearance Not Required.** A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

**(B) Objections.** A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises, or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed by the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

**(A) When Required.** On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

**(B) When Permitted.** To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

**(C) Specifying Conditions as an Alternative.** In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

### (e) Duties in Responding to a Subpoena.

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

**(A) Documents.** A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

**(B) Form for Producing Electronically Stored Information Not Specified.** If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained, or in a reasonably usable form or forms.

**(C) Electronically Stored Information Produced in Only One Form.** The person responding need not produce the same electronically stored information in more than one form.

**(D) Inaccessible Electronically Stored Information.** The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

**(A) Information Withheld.** A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

**(B) Information Produced.** If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

# APPENDIX D

<b>1. To (Name, Address, City, State, Zip Code)</b> Twitter, Inc. c/o Trust & Safety - Legal Policy 1355 Market Street, Suite 900 San Francisco, CA 94103	<b>DEPARTMENT OF HOMELAND SECURITY</b>  <b>SUMMONS</b>  <b>to Appear and/or Produce Records</b> <b>19 U.S.C. § 1509</b>
<b>Summons Number</b> 2017012	<b>Case Number:</b> 201704511

By the service of this subpoena upon you, **YOU ARE HEREBY SUMMONED AND REQUIRED TO:**

- (A)  **APPEAR** before the U.S. Customs and Border Protection (CBP) Officer or U.S. Immigration and Customs Enforcement (ICE) Special Agent named in Block 2 at the place, date, and time indicated to testify and give information.
- (B)  **PRODUCE** the records (including statements, declarations, and other documents) indicated in Block 3 before the CBP Officer or ICE Special Agent named in Block 2 at the place, date, and time indicated.

Your testimony and/or production of the indicated records is required in connection with an investigation or inquiry to ascertain the correctness of entries, to determine the liability for duties, taxes, fines, penalties, or forfeitures, and/or to ensure compliance with the laws or regulations administered by CBP and ICE.

Failure to comply with this summons will render you liable to proceedings in a U.S. District Court to enforce compliance with this summons as well as other sanctions.

<b>2. (A) CBP Officer or ICE Special Agent before whom you are required to appear</b> Name [REDACTED] Title Special Agent Address 1300 Pennsylvania Ave. N.W. Room 8.3 Washington D.C. 20229 Telephone Number [REDACTED]	<b>(B) Date</b> 03/13/2017  <b>(C) Time</b> 11:45 <input checked="" type="checkbox"/> a.m. <input type="checkbox"/> p.m.
---	---

<b>3. Records required to be produced for inspection</b> All records regarding the twitter account @ALIENSCIS to include, User names, account login, phone numbers, mailing addresses, and I.P addresses.
--

*You are requested not to disclose the existence of this summons for an indefinite period of time. Any such disclosure will impede this investigation and thereby interfere with the enforcement of federal law.*

Issued under authority of section 509, Tariff Act of 1930, as amended by Public law 95-410 (19 U.S.C. § 1509); 44 F.R. 2217; Homeland Security Act of 2002

<b>4. Name of person authorized to serve this summons or any other CBP Officer or ICE Special Agent</b>  Special Agent [REDACTED]	<b>5. Date of issue</b> 03/14/2017  By <u>Stephen P. Caruso</u> (Signature)
---	--



If you have any questions regarding this summons, contact the CBP Officer or ICE Special Agent identified in Block 2.

<b>6. Name, title, address, and telephone number of person issuing this summons</b> Name Stephen P. Caruso Title Special Agent in Charge Address 11606 City Hall Promenade Suite 400, Miramar, FL 33025 Telephone Number (954) 843-5068
--



**CERTIFICATE OF SERVICE AND ACKNOWLEDGMENT OF RECEIPT**

**A. CERTIFICATE OF SERVICE OF SUMMONS**

I certify that I served the summons on the front of this form as follows:

<input type="checkbox"/> I delivered a copy of the summons to the person to whom it was directed, as follows:	Address or Location	Date
		Time <input type="checkbox"/> a.m. <input type="checkbox"/> p.m.

<input checked="" type="checkbox"/> (For corporations, partnerships, and unincorporated associations which may be sued under a common name)  I delivered a copy of the summons to an officer, managing or general agent, or agent authorized to accept service of process as follows:	Address or Location Twitter, Inc. c/o Trust & Safety - Legal Policy 1355 Market Street, Suite 900 San Francisco, CA 94103	Date 03/13/2017
		Time 11:45 <input checked="" type="checkbox"/> a.m. <input type="checkbox"/> p.m.

Name of person to whom the summons was delivered  
 Faxing to [REDACTED] (attn: Trust & Safety - Legal Policy)

Signature [REDACTED]
-------------------------

Title Special Agent	Date 03/13/2017
------------------------	--------------------

**B. ACKNOWLEDGMENT OF RECEIPT**

I acknowledge receipt of a copy of the summons on the front of this form.

Signature
-----------

Title	Date	Time <input type="checkbox"/> a.m. <input type="checkbox"/> p.m.
-------	------	--

