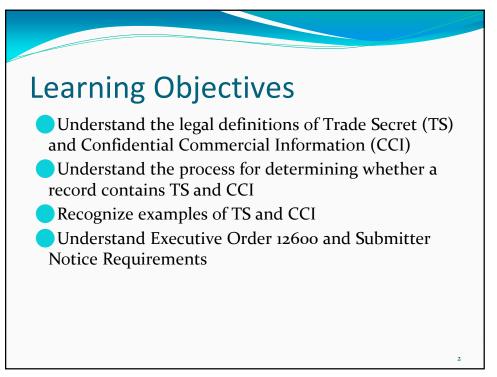
FOIA EXEMPTION 4 – TRADE SECRET AND CONFIDENTIAL COMMERCIAL INFORMATION

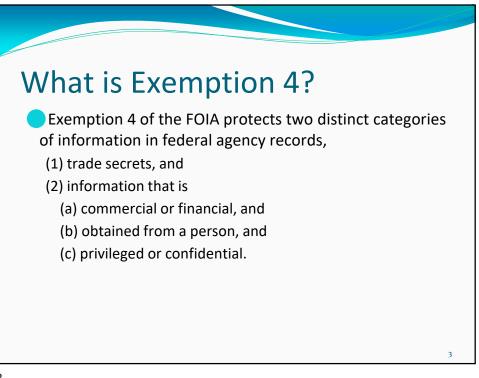
American Society of Access Professionals National Training Conference 2022

> William H. Holzerland Department of the Interior

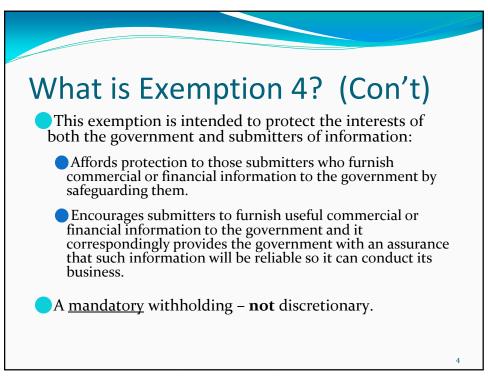
Reginald Smith Food & Drug Administration

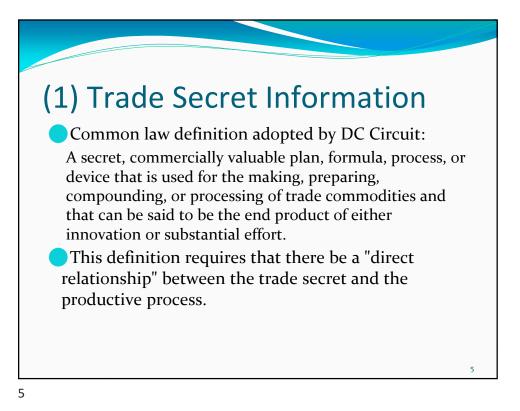




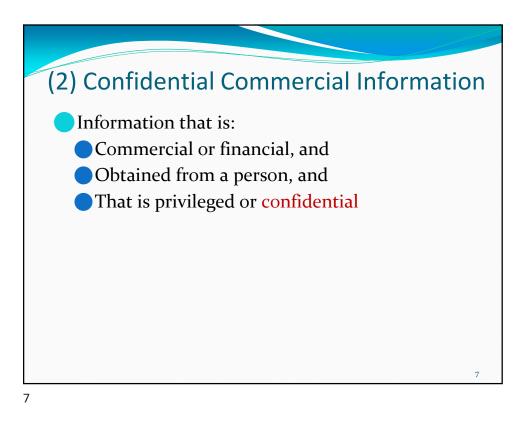


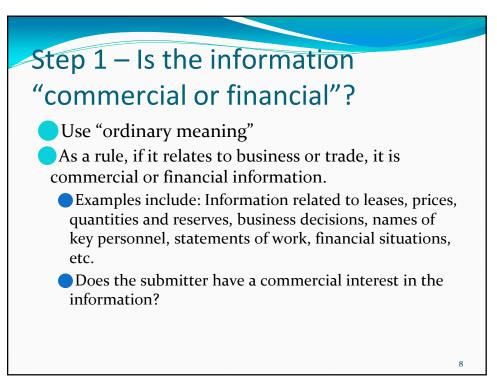


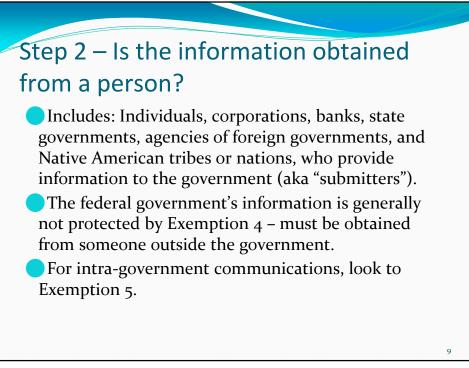


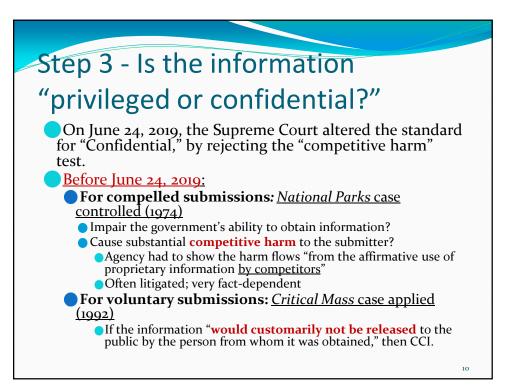


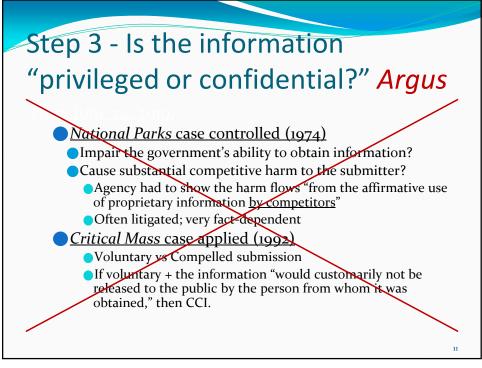


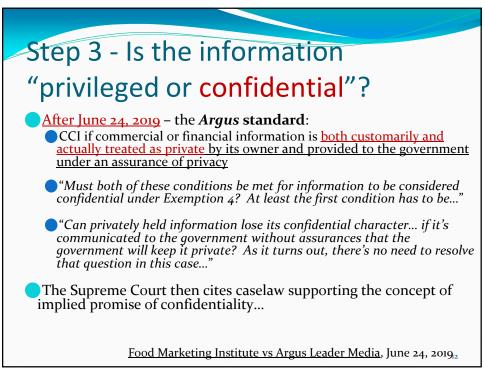


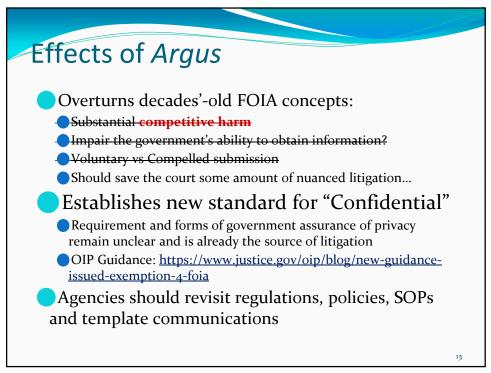












Decision Tree for CC	
Is the information commercial or financial?	 YES – Go to next step NO – Not CCI
Was the information obtained from a person? (As opposed to the gov't)	 YES – Go to next step NO – Not CCI
Does the submitter keep the information private or closely held? (<i>Argus</i>)	 YES – Go to next step NO – Not CCI
Did the gov't provide an express or implied assurance of confidentiality when the information was submitted to the gov't? (<i>Argus</i>)	YES - Withhold as CCINO - Go to next step
Were there express or implied indications at the time the information was submitted that the gov't would publicly disclose the information? (Argus)	 YES - Not CCI No - Withhold as CCI

