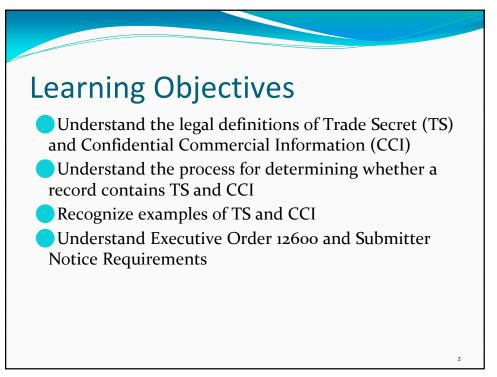
## FOIA EXEMPTION 4 – TRADE SECRET AND CONFIDENTIAL COMMERCIAL INFORMATION

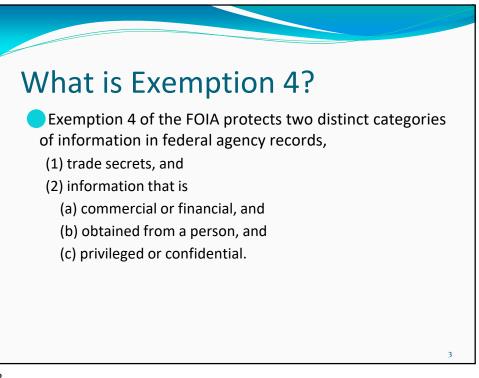
American Society of Access Professionals National Training Conference 2022

> William H. Holzerland Department of the Interior

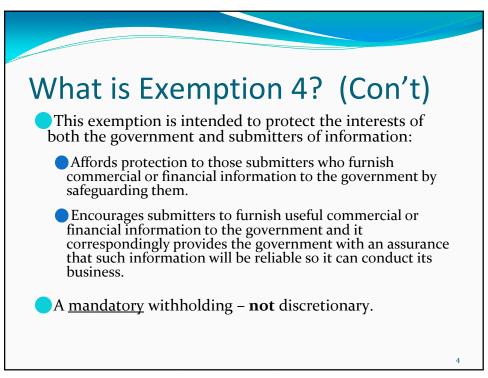
Reginald Smith Food & Drug Administration

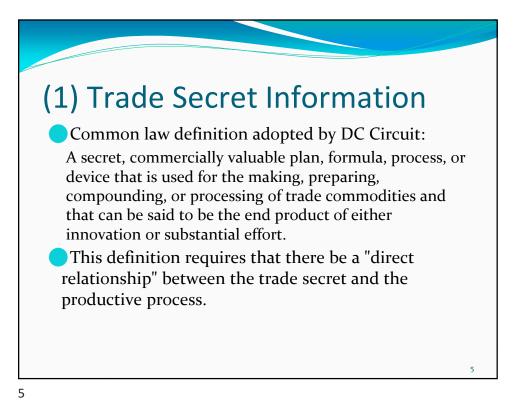




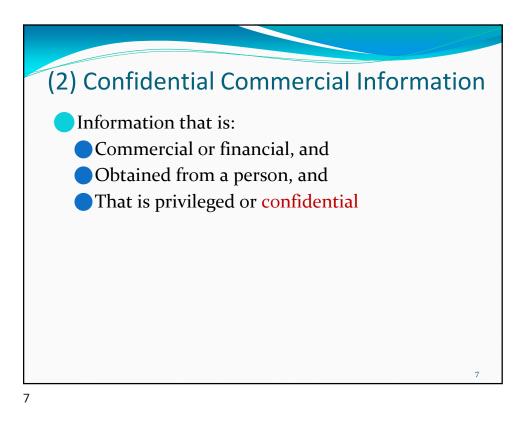


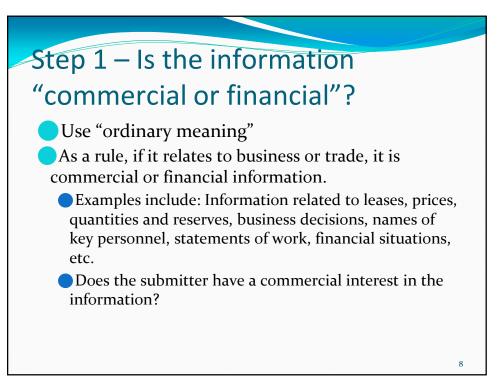


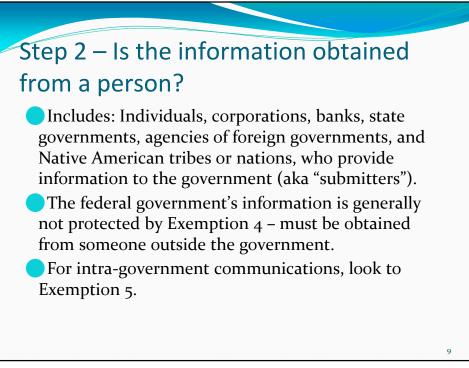


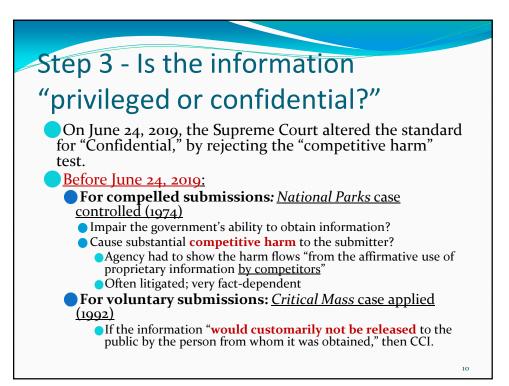


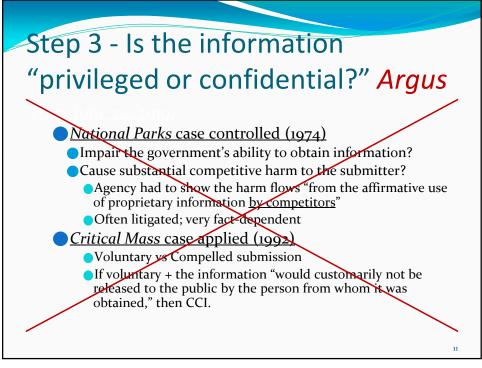


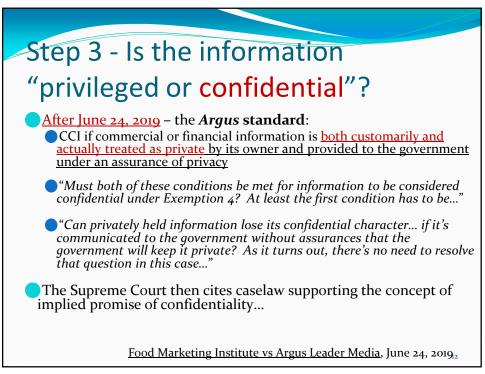


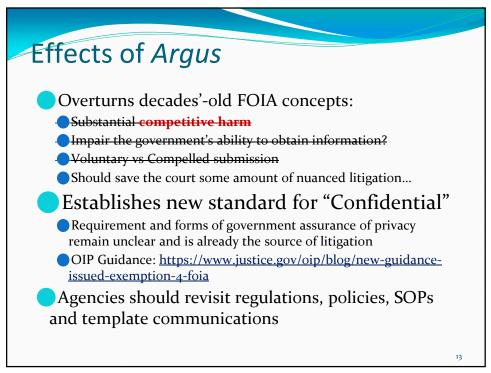












| Decision Tree for CC  |  |
|---|--|
| Is the information commercial or<br>financial?  | <ul> <li>YES – Go to next step</li> <li>NO – Not CCI</li> </ul>      |
| Was the information obtained from a person? (As opposed to the gov't)   | <ul> <li>YES – Go to next step</li> <li>NO – Not CCI</li> </ul>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

