

1 KATIE TOWNSEND (SBN 254321)
ktownsend@rcfp.org
2 Bruce D. Brown (of counsel)
Gabriel Rottman (of counsel)
3 Caitlin Vogus (of counsel)
4 REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS
5 1156 15th Street NW, Suite 1020
Washington, DC 20005

6
7 *Counsel for Proposed Amici*
8 *Reporters Committee for Freedom of the Press*
9 *and 59 Media Organizations*

10
11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF SAN FRANCISCO**

13
14 **IN RE: EX PARTE APPLICATION OF**
15 **NON-PARTY JOURNALIST BRYAN**
16 **CARMODY FOR ORDER QUASHING**
17 **SEARCH WARRANT AND FOR**
18 **RETURN OF IMPROPERLY SEIZED**
19 **NEWSGATHERING MATERIALS, OR,**
20 **IN THE ALTERNATIVE, TO**
21 **SHORTEN TIME**

Search Warrant Nos. SW43684 and SW43687

22 **NOTICE OF MOTION AND MOTION OF**
23 **REPORTERS COMMITTEE FOR**
24 **FREEDOM OF THE PRESS AND 59**
25 **MEDIA ORGANIZATIONS FOR LEAVE**
26 **TO FILE *AMICUS CURIAE* LETTER IN**
27 **SUPPORT OF EX PARTE APPLICATION**
28 **OF NON-PARTY JOURNALIST BRYAN**
CARMODY FOR ORDER QUASHING
SEARCH WARRANT AND FOR RETURN
OF IMPROPERLY SEIZED
NEWSGATHERING MATERIALS, OR, IN
THE ALTERNATIVE, TO SHORTEN
TIME

Date: May 21, 2019

Time: 9 a.m.

Department: 22 (Hon. Samuel Feng, Asst. PJ)

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that the Reporters Committee for Freedom of the Press and the
3 59 media organizations set forth below (collectively, the “proposed *amici*”), will and hereby do
4 move the Court for leave to file the proposed *amicus curiae* letter attached as Exhibit A to this
5 Motion in support of the Ex Parte Application of Non-Party Journalist Bryan Carmody for Order
6 Quashing Search Warrant and for Return of Improperly Seized Newsgathering Materials, or, in the
7 Alternative, or Shorten Time, which is set to be heard on Tuesday, May 21, 2019 at 9 a.m., in
8 Department 22 of the above-entitled Court, located at 850 Bryant Street, San Francisco, CA 94103.

9 **INTEREST OF PROPOSED AMICI**

10 Proposed *amici* are the Reporters Committee for Freedom of the Press, The (San Luis
11 Obispo) Tribune, American Society of News Editors, The Associated Press, Associated Press Media
12 Editors, Association of Alternative Newsmedia, California News Publishers Association,
13 Californians Aware, CALmatters, CBS Broadcasting Inc. on behalf of CBS News and KPIX-TV,
14 Courthouse News Service, Criminal Justice Journalists, The Daily Beast Company LLC, Dow Jones
15 & Company, Inc., The E.W. Scripps Company, First Amendment Coalition, First Look Media
16 Works, Inc., Freedom of the Press Foundation, The Fresno Bee, Gannett Co., Inc., Hearst
17 Corporation, Inter American Press Association, International Documentary Assn., Investigative
18 Reporting Program, Investigative Reporting Workshop at American University, Los Angeles Times
19 Communications LLC, The McClatchy Company, The Media Institute, Media Law Resource
20 Center, Merced Sun-Star, Meredith Corp., The Modesto Bee, MPA – The Association of Magazine
21 Media, National Freedom of Information Coalition, The National Press Club, National Press Club
22 Journalism Institute, National Press Photographers Association, National Public Radio, Inc., The
23 New York Times Company, News Media Alliance, Newsday LLC, The Northern California
24 Chapter of the Society of Professional Journalists, NYP Holdings, Inc., Pacific Media Workers
25 Guild (The NewsGuild-CWA Local 39521), PEN America, ProPublica, Radio Television Digital
26 News Association, Reporters Without Borders, Reuters News & Media Inc., Reveal from The
27 Center for Investigative Reporting, The Sacramento Bee, The San Diego Union-Tribune LLC,
28

1 Sinclair Broadcast Group, Inc., Society of Environmental Journalists, Society of Professional
2 Journalists, TEGNA Inc., Tribune Media Company, Tribune Publishing Company, Tully Center for
3 Free Speech, and The Washington Post.

4 On May 10, 2019, the San Francisco Police Department (“SFPD”) executed search warrants
5 at the home and office of San Francisco journalist Bryan Carmody. As set forth in Mr. Carmody’s
6 motion, the SFPD on April 11, 2019 had sought his cooperation in identifying his confidential
7 source for a police report related to the death of San Francisco Public Defender Jeff Adachi. After
8 Mr. Carmody declined to identify his confidential source for the report, the SFPD executed the
9 search warrants against his home and the office of his news organization, North Bay News.

10 As news organizations and advocates that work to defend the First Amendment and
11 newsgathering rights of journalists, proposed *amici* are deeply concerned by the SFPD’s treatment
12 of Mr. Carmody, and the Department’s apparent disregard for the federal and state constitutional
13 and statutory protections that strictly limit when law enforcement may search for, or seek to compel
14 a journalist to produce, confidential work product or documentary materials, or to force a reporter to
15 identify a confidential source. For the reasons set forth in the proposed *amicus curiae* letter
16 attached hereto as Exhibit A, proposed *amici* urge the Court to order the immediate return of Mr.
17 Carmody’s work product, documentary materials, and newsgathering equipment seized by the
18 SFPD on May 10.

19 **THE PROPOSED AMICUS CURIAE LETTER WILL ASSIST THE COURT**

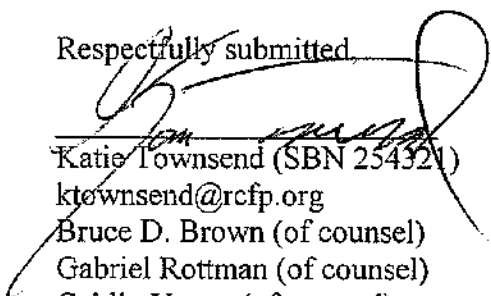
20 Courts have broad discretion to permit *amicus curiae* participation. *See, e.g., In re Roxford*
21 *Foods Litigation*, 790 F. Supp. 987, 997 (E.D. Cal. 1991) (noting that “[g]enerally, courts have
22 exercised great liberality in permitting an *amicus curiae* to file a brief in a pending case”) (quoting
23 *United States v. Louisiana*, 751 F. Supp. 608, 620 (E.D. La. 1990). This Motion is made on
24 grounds that the proposed *amicus curiae* letter would assist the Court in ruling on Mr. Carmody’s
25 Ex Parte Application of Non-Party Journalist Bryan Carmody for Order Quashing Search Warrant
26 and for Return of Improperly Seized Newsgathering Materials, or, in the Alternative, or Shorten
27 Time. *Compare* Calif. Rule of Court 8.200(c)(2) (setting forth rule for *amicus curiae* submissions
28

1 in appellate matters). Proposed *amici* represent the interests of local, state, and national news
2 organizations and journalists throughout California and the nation. Proposed *amici* have substantial
3 knowledge and expertise concerning federal and state constitutional and statutory protections that
4 limit when law enforcement may search for, or seek to compel a journalist to produce, confidential
5 work product or documentary materials, or to force a reporter to identify a confidential source. The
6 proposed *amicus curiae* letter outlines key legal protections for journalists' newsgathering activities
7 for the benefit of the Court and underscores the importance to the press and the public of ensuring
8 that such protections are rigorously enforced. Proposed *amici* believe their perspective will aid the
9 Court in ruling on Mr. Carmody's Ex Parte Application of Non-Party Journalist Bryan Carmody for
10 Order Quashing Search Warrant and for Return of Improperly Seized Newsgathering Materials, or,
11 in the Alternative, or Shorten Time.

12 For these reasons, proposed *amici* respectfully request that the Court grant them leave to
13 file the proposed *amicus curiae* letter attached hereto as Exhibit A in the above-captioned matter.

14
15 Dated: May 16, 2019

Respectfully submitted,


Katie Townsend (SBN 254321)
ktownsend@rcfp.org
Bruce D. Brown (of counsel)
Gabriel Rottman (of counsel)
Caitlin Vogus (of counsel)
REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS
1156 15th Street NW, Suite 1020
Washington, DC 20005

*Counsel for Proposed Amici Reporters
Committee for Freedom of the Press
and 59 Media Organizations*

1 **PROOF OF SERVICE**

2 I, the undersigned, say: I am over 18 years of age, employed in Washington, DC, and not a
3 party to the subject cause. My business address is: Reporters Committee for Freedom of the Press,
4 1156 15th St. NW, Suite 1020, Washington, DC 20005.

5 I serve the following document:

- 6
- 7 • **NOTICE OF MOTION AND MOTION OF REPORTERS COMMITTEE FOR**
8 **FREEDOM OF THE PRESS AND 59 MEDIA ORGANIZATIONS FOR LEAVE**
9 **TO FILE *AMICUS CURIAE* LETTER IN SUPPORT OF EX PARTE**
10 **APPLICATION OF NON-PARTY JOURNALIST BRYAN CARMODY FOR**
11 **ORDER QUASHING SEARCH WARRANT AND FOR RETURN OF**
12 **IMPROPERLY SEIZED NEWSGATHERING MATERIALS, OR, IN THE**
13 **ALTERNATIVE, TO SHORTEN TIME**
14

15 by placing a copy thereof in an envelope for the addressee named hereafter, addressed to the
16 addressees as follows:

17 **George Gascon**
18 **District Attorney**
19 **City and County of San Francisco**
20 **850 Bryant Street, Rm. 322**
21 **San Francisco, CA 94103**

22 **Manohar Raju**
23 **Public Defender**
24 **Matt Gonzales**
25 **Chief Attorney**
26 **San Francisco Public Defender's Office**
27 **555 7th Street**
28 **San Francisco, CA 94103**

Ronnie Wagner, Attorney
San Francisco Police Dept.
850 Bryant Street, Rm. 511
San Francisco, CA 94103

1 **Thomas Burke**
2 **Davis Wright Tremaine LLP**
3 **600 Montgomery Street, Suite 800**
4 **San Francisco, CA 94111**

5 Following ordinary business practices, the envelope was sealed and placed for collection and
6 mailing on this date by FedEx, overnight delivery, and would, in the ordinary course of business, be
7 deposited with FedEx on May 16, 2019. I also sent a copy of the above-titled filing(s) by electronic
8 mail to the following addressee listed on May 16, 2019:

9 **Thomas Burke**
10 **Davis Wright Tremaine LLP**
11 **600 Montgomery Street, Suite 800**
12 **San Francisco, CA 94111**
13 **thomasburke@dwt.com**

14 I declare under penalty of perjury under the laws of the State of California that the foregoing
15 is true and corrected.

16 Executed on May 16, 2019 at Washington, DC

17 /s/ Katie Townsend
18 Katie Townsend

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22
23
24
25
26
27
28

EXHIBIT A

REPORTERS COMMITTEE

FOR FREEDOM OF THE PRESS

1156 15th Street NW, Suite 1020
Washington, DC 20005
(202) 795-9300
www.rcfp.org
Bruce D. Brown
Executive Director
bbrown@rcfp.org
(202) 795-9301

STEERING COMMITTEE

STEPHEN J. ADLER

Reuters

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WOLF BLITZER

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Jigsaw Productions

SUSAN GOLDBERG

National Geographic

JAMES GRIMALDI

The Wall Street Journal

LAURA HANDMAN

Davis Wright Tremaine

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Hearst

KAREN KAISER

The Associated Press

DAVID LAUTER

Los Angeles Times

DAHLIA LITHWICK

Slate

MARGARET LOW

The Atlantic

JANE MAYER

The New Yorker

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Boston University

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CAROL ROSENBERG

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THOMAS C. RUBIN

Stanford Law School

CHARLIE SAVAGE

The New York Times

BEN SMITH

BuzzFeed

JENNIFER SONDAG

Bloomberg News

PIERRE THOMAS

ABC News

SAUNDRA TORRY

Freelance

VICKIE WALTON-JAMES

NPR

JUDY WOODRUFF

PBS/The NewsHour

SENIOR ADVISORS

CHIP BOK

Creators Syndicate

JOHN C. HENRY

Freelance

TONY MAURO

National Law Journal

ANDREA MITCHELL

NBC News

PAUL STEIGER

ProPublica

*Affiliations appear only
for purposes of identification*

May 16, 2019

The Honorable Samuel Feng
The Superior Court for the State of California
In and For the County of San Francisco
Department 22, 3rd Floor
Hall of Justice
850 Bryant St.
San Francisco, CA 94103

Via Hand Delivery

Re: Ex Parte Application Of Non-Party Journalist Bryan Carmody For Order Quashing Search Warrant And For Return Of Improperly Seized Newsgathering Materials, Or, In The Alternative, To Shorten Time; Search Warrants Executed on 5/10/19 at the Home (794 45th Ave.) and Office (459 Fulton St.) of San Francisco Journalist Bryan Carmody

Your Honor:

The Reporters Committee for Freedom of the Press (“Reporters Committee” or “RCFP”) and 59 other media organizations, including 19 California-based *amici* (collectively, “*amici*”), write in support of the application of San Francisco journalist Bryan Carmody to quash and to compel the return of protected work product, documentary materials, and newsgathering equipment seized by the San Francisco Police Department (“SFPD” or the “Department”) on May 10, 2019.

As detailed in Mr. Carmody’s motion, on April 11, 2019, the SFPD sought Mr. Carmody’s cooperation in identifying his confidential source for a police report related to the death of elected San Francisco Public Defender Jeff Adachi. The police report obtained by Mr. Carmody was unquestionably newsworthy. His reporting and reporting by other journalists and news organizations about it was in the public interest and plainly protected by federal and state constitutional and statutory law. And, indeed, though the report had not been released publicly by the Department when Carmody pitched a February 2019 story based on the report and other documents to three local news outlets, many of the details of the report are likely subject to the mandatory disclosure requirements of the California Public Records Act. On May 10, almost a month after Mr. Carmody declined to identify his confidential source, the SFPD executed search warrants against his home and office and seized material and newsgathering equipment from him and his company, North Bay News.

As news organizations and advocates that work to defend the First Amendment and newsgathering rights of journalists, *amici* are deeply concerned by the SFPD’s treatment of Mr. Carmody, and the Department’s possible disregard for the federal and state constitutional and statutory protections that strictly limit

when law enforcement may search for, or seek to compel a journalist to produce, confidential work product or documentary materials, or attempt to force a reporter to identify a confidential source. These protections are vital to journalists' ability to effectively gather and report news of importance to the public.

Additionally, the mass seizure of Mr. Carmody's work product, documentary materials, and newsgathering equipment has both endangered the identity of Mr. Carmody's other confidential sources and has effectively shut down Mr. Carmody's newsgathering activities. The longer the police retain the material seized, the harder it will be for Mr. Carmody to continue his reporting on other stories. These considerations and others demand the immediate return of Mr. Carmody's material and equipment.

The California Constitution and California statutory law clearly prohibit the use of a search warrant to seize journalistic work product. The California Penal Code states that search warrants may not be used to seize materials described in section 1070 of the California Evidence Code, including broadly defined work product and documentary material. Cal. Penal Code § 1524(g). And the protections of section 1070 of the Evidence Code, the California "shield law," are incorporated in article I, section 2 of the California Constitution. *See also People v. Von Villas*, 10 Cal. App. 4th 201, 231-32 (1992) (applying shield law protections to freelance writer).

California law also expressly provides that an aggrieved journalist may seek the return of items seized in violation of the law. Penal Code Section 1538.5(n), invoked by Mr. Carmody before this Court, states that, "Nothing contained in this section shall prohibit a person from making a motion, otherwise permitted by law, to return property, brought on the ground that the property obtained is protected by the free speech and press provisions of the United States and California Constitutions."

Additionally, we are concerned by SFPD's possible violation of federal law in executing these search warrants. The federal Privacy Protection Act of 1980 protects the flow of confidential information to journalists by limiting when law enforcement—including state agencies and city departments like the SFPD—may search for or seize journalistic work product of documentary materials. *See* Pub. L. No. 96-440, 94 Stat. 1879 (1980), codified at 42 U.S.C. §§ 2000aa, 2000aa-5 to 2000aa-7.

For journalists' work product,¹ authorities may only search for or seize such material if the immediate seizure is necessary to prevent the death of, or serious bodily injury to, a human being, or where there is probable cause to believe that the possessor has committed or is committing certain crimes. The latter carve-out, known as the "suspect exception," applies only

¹ Work product encompasses material prepared by the journalist or another in anticipation of reporting to the public. It is defined as material that is prepared, produced, authored, or created by any person in anticipation of that material being communicated to the public; is possessed for the purposes of communicating such materials to the public; and includes the mental impressions, conclusions, opinions, or theories of the person who created the material. 42 U.S.C. § 2000aa-7(b).

where the offense to which the material relates does not consist of the receipt, possession, communication, or withholding of the material. 42 U.S.C. § 2000aa(a)(1)-(2).²

For all other documentary material,³ the PPA adds two additional exceptions that permit its seizure by law enforcement. These are: when notice pursuant to a subpoena would result in destruction, alteration, or concealment of such materials; or when such materials have not been produced pursuant to a court order directing compliance with a subpoena, all appellate remedies have been exhausted, and there is reason to believe that delay in an investigation or trial occasioned by further proceedings relating to the subpoena would threaten the interests of justice. 42 U.S.C. § 2000aa(b)(1)-(4). With respect to the “interests of justice” exception, the person possessing such materials must be permitted to submit an affidavit explaining why the materials are not subject to seizure. 42 U.S.C. § 2000aa(c).

Amici are concerned that the PPA may have been violated in this case. The public record associated with the execution of these warrants does not reflect any basis for applying any of these limited exceptions to the PPA, nor does it provide any indication that the SFPD relied on any of these exceptions when seeking and executing the warrants. Indeed, there is no basis for concluding that the warrants were supported by the exigency exceptions, such as threat to life or limb, or spoliation of documentary material, in light of the fact that SFPD asked for Carmody’s voluntary compliance on April 11, almost a month before the searches were conducted and his work product and documentary material seized. Nor does it appear that SFPD ever issued, much less sought to enforce, a subpoena.

Additionally, the United States Department of Justice (“DOJ” or the “Justice Department”) has had internal policies in place for almost five decades limiting when and how federal prosecutors may seize materials from, or records of, members of the news media. These “news media guidelines,” as they are known, were expanded in 2014 to include federal search warrants. 28 C.F.R. § 50.10.

Under the DOJ news media guidelines:

- Except as set forth in the suspect exception to the PPA, where members of the Justice Department must secure authorization from a deputy assistant attorney general for the Criminal Division, prosecutors must secure attorney general approval before seeking a

² The “suspect exception” does apply to the receipt, possession, communication, or withholding of material covered by the federal Espionage and Atomic Energy Acts and child exploitation laws. *See* 42 U.S.C. § 2000aa(a)(1), (b)(1); 18 U.S.C. §§ 793, 794, 797, 798, 2251, 2251A, 2252, 2252A; 42 U.S.C. §§ 2274, 2275, 2277; 50 U.S.C. § 783.

³ “Documentary materials” means materials upon which information is recorded. 42 U.S.C. § 2000aa-7(a) (listing examples, such as photographs, video, and audio tapes). Neither documentary materials nor work product materials include contraband; the fruits of a crime; things otherwise criminally possessed; or property designed or intended for use, or which is or has been used as, the means of committing a criminal offense. 42 U.S.C. § 2000a-7(a) and (b).

warrant to search the premises, property, communications records, or business records of a member of the news media, § 50.10(d)(1), (d)(4);

- Prosecutors may only invoke the PPA suspect exception when the conduct that is the basis for the investigation is not based on, or within the scope of, newsgathering activities, § 50.10(d)(4); and
- Prosecutors must make all reasonable attempts to obtain the information from alternative sources, § 50.10(c)(5), (d)(3).

The search, seizure, and questioning here happened on May 10, and *amici* are still gathering facts about the incident. *Amici* therefore are continuing to explore how the DOJ news media guidelines govern federal involvement in this case.⁴ The protections in the guidelines underscore the appropriate sensitivity with which journalists' work product and documentary materials are treated under federal and state laws and regulations.

Indeed, the statement of principles introducing the guidelines neatly encapsulates the policy rationale behind such protections: "Because freedom of the press can be no broader than the freedom of members of the news media to investigate and report the news, the Department's policy is intended to provide protection to members of the news media from certain law enforcement tools, whether criminal or civil, that might unreasonably impair newsgathering activities." 28 C.F.R. § 50.10(a).

Search warrants directed at members of the news media present a particularly potent threat to newsgathering and reporting.

As Senator Edward Kennedy (D-MA) explained shortly before Congress passed the PPA: "By exposing the work product of reporters to the roving eye of any policeman who has obtained a search warrant to examine newsroom documents, [the execution of a warrant] threatens to dry up the confidential sources of information which form the backbone of investigative journalism." Privacy Protection Act, Hearing Before the S. Judiciary Comm. on S. 115, S. 1790, and S. 1816, 96th Cong. 2 (1980) (opening statement of Sen. Edward M. Kennedy, chairman).

Journalists rely on assurances of confidentiality in the pursuit of newsworthy information. Confidentiality of sources is even more important when newsgathering may reveal government misconduct or might be perceived as embarrassing the government. Law enforcement use of

⁴ According to news reports, the FBI has confirmed that while agents did not participate in the execution of the warrant, they were present during the SFPD search and questioned Mr. Carmody. See Eli Rosenberg, *A Reporter Declined to Reveal His Source. Then Police Showed Up at His Front Door with Guns*, Wash. Post, May 11, 2019, <https://perma.cc/BN6U-L9HB>. In his declaration, Mr. Carmody states that during the search of his home, two FBI agents took him into his home office and asked him repeatedly to reveal the identity of his confidential source. The news media guidelines require any member of the Justice Department to notify the director of the Office of Public Affairs and obtain express attorney general approval before questioning a member of the news media, unless the offense the member of the news media is suspected of committing was not committed in the course of or did not arise from newsgathering activities. 28 C.F.R. § 50.10(f).

tools like search warrants to chill the disclosure of newsworthy information demands that courts rigorously enforce existing legal protections for journalists' work product and documentary materials.

For all of these reasons, and those set forth in Mr. Carmody's motion, *amici* urge this Court to order the immediate return of Mr. Carmody's protected work product, documentary materials, and newsgathering equipment seized on May 10.

Sincerely,

Katie Townsend (SBN 254321)
ktownsend@rcfp.org
Bruce D. Brown (of counsel)
Gabriel Rottman (of counsel)
Caitlin Vogus (of counsel)
REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS
1156 15th Street NW, Suite 1020
Washington, DC 20005

On behalf of:

The Reporters Committee for Freedom of
the Press
The (San Luis Obispo) Tribune
American Society of News Editors
The Associated Press
Associated Press Media Editors
Association of Alternative Newsmedia
California News Publishers Association
Californians Aware
CALmatters
CBS Broadcasting Inc, on behalf of CBS
News and KPIX-TV
Courthouse News Service
Criminal Justice Journalists
The Daily Beast Company LLC
Dow Jones & Company, Inc.
The E.W. Scripps Company
First Amendment Coalition
First Look Media Works, Inc.
Freedom of the Press Foundation
The Fresno Bee
Gannett Co., Inc.
Hearst Corporation
Inter American Press Association
International Documentary Assn.

Investigative Reporting Program
Investigative Reporting Workshop at
American University
Los Angeles Times Communications LLC
The McClatchy Company
The Media Institute
Media Law Resource Center
Merced Sun-Star
Meredith Corp.
The Modesto Bee
MPA -- The Association of Magazine Media
National Freedom of Information Coalition
The National Press Club
National Press Club Journalism Institute
National Press Photographers Association
National Public Radio, Inc.
The New York Times Company
News Media Alliance
Newsday LLC
The Northern California Chapter of the
Society of Professional Journalists
NYP Holdings, Inc.
Pacific Media Workers Guild (The
NewsGuild-CWA Local 39521)
PEN America

ProPublica
Radio Television Digital News Association
Reporters Without Borders
Reuters News & Media Inc.
Reveal from The Center for Investigative
Reporting
The Sacramento Bee
The San Diego Union-Tribune LLC

Sinclair Broadcast Group, Inc.
Society of Environmental Journalists
Society of Professional Journalists
TEGNA Inc.
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Tribune Publishing Company
Tully Center for Free Speech
The Washington Post