



Slone, Sid <sid_slone@fws.gov>

Fwd: Fist Amendment Documents (Park Service)

3 messages

13

Mon, Jul 9, 2018 at 3:26 PM

Kirkpatrick, Allan <allan_kirkpatrick@fws.gov>

To: Sid Slone <sid_slone@fws.gov>, Brian Krukoski <brian_krukoski@fws.gov>

Cc: Joseph Mojica <Joseph_Mojica@fws.gov>, Richard Johnston <Richard_A_Johnston@fws.gov>, Yurie Aitken <yurie_aitken@fws.gov>, Mike West <mike_west@fws.gov>, Rodney Hansen <rodney_hansen@fws.gov>, Chris Jussila <chris_jussila@fws.gov>

Hi Sid and Brian,

Rod Hansen has compiled a number of demonstration related documents.

Please note the Boardley memo eliminated our use of 50 CFR 26.36.

Rod is attempting to contact Kim Fondren for additional site guidance.

The Park Service regulations are examples for complying with Boardley.

They include identifying 1st amendment areas, including distributing items.

I've also attached the new regulations for filming memo.

I was able to speak with (b) (6)

His reiterated that two of his friends are leaving Washington state to travel to their home and property in Ajo with the intent to protest FWS handling of leaving water on NWRs during the first week of August. They said they will open their house and property to people who are attending the protest. (b) (6) is not willing to give the names of the two people.

(b) (6) believes that No More Deaths and/or Good Samaritans are involved. He stated either the planning is being kept tightly controlled, or only a limited number of people are aware of it. He stated he is on NMD's mailing list and nothing has gone out on the list.

Neither Rod nor I can find reference to a protest or demonstration on either group's websites.

(b) (6) said he would contact me in the future if he got more information that he felt comfortable sharing.

Thanks! I'll see you on Wed in Ajo.

Allan

----- Forwarded message -----

From: **Kirkpatrick, Allan** <allan_kirkpatrick@fws.gov>

Date: Mon, Jul 9, 2018 at 2:39 PM

Subject: Re: Fist Amendment Documents (Park Service)

To: "Hansen, Rodney" <rodney_hansen@fws.gov>

Super. Thanks Rod!

On Mon, Jul 9, 2018 at 2:37 PM, Hansen, Rodney <rodney_hansen@fws.gov> wrote:

Allan,

Attached are documents relating to how the Park Service is dealing with 1st Amendment issues. Also attached is the Boardley memo that was sent out in 2010. I would think that if we do things similar to the Park Service we should be OK. I'm still trying to get in touch with Kim.

Good reading!!!



Rod Hansen
Risk and Threat Assessment Coordinator
United States Fish and Wildlife Service
Division of Refuge Law Enforcement
5275 Leesburg Pike
Falls Church, VA 22041-3803
Office: (703) 358-2069
Cell: (571) 327-6965

CONFIDENTIALITY NOTICE: This e-mail, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. Parts of this document may contain sensitive security information that is controlled under the provisions of 49 CFR 1520. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

--

Allan Kirkpatrick
Federal Wildlife Zone Officer
Zone 2, Region 2
201 N Bonita Ste 141
Tucson, AZ 85745

(520) 240-0547 (cell)

--

Allan Kirkpatrick
Federal Wildlife Zone Officer
Zone 2, Region 2
201 N Bonita Ste 141
Tucson, AZ 85745

(520) 240-0547 (cell)



New Regulations for Commercial Filming.docx
17K

Slone, Sid <sid_slone@fws.gov>
To: "Kirkpatrick, Allan" <allan_kirkpatrick@fws.gov>

Tue, Jul 10, 2018 at 7:52 AM

Hi Allen, I only received the commercial filming info, nothing on demonstrations. Did I miss something?

Sid

[Quoted text hidden]

--

Sid Slone
Manager

Cabeza Prieta NWR

1611 N. 2nd Ave.
Ajo, AZ 85321

PH: 520-387-4993
CELL: 520-560-0555

Kirkpatrick, Allan <allan_kirkpatrick@fws.gov>

Tue, Jul 10, 2018 at 1:20 PM

To: Sid Slone <sid_slone@fws.gov>, Mike West <mike_west@fws.gov>, Brian Krukoski <brian_krukoski@fws.gov>






Hi Sid,

I tried to send from my phone this am, but I'm not sure they made it. Sorry if this is a duplicate.

Allan

[Quoted text hidden]

5 attachments

-  **36 CFR 2.51.pdf**
140K
-  **36 CFR 2.52.pdf**
136K
-  **First-Amendment-Rights-Wording-Amendment-1.pdf**
273K
-  **Mem_Boardley AD Memo_jhall_10012010.PDF**
51K
-  **PM_14-01.pdf**
188K

New Regulations for Commercial Filming, Still Photography and Audio recording

When do the new regulations take effect? On August 22, 2013 the Department of the Interior published final regulations in the Federal Register on commercial filming, still photography and audio recording applying to the National Park Service (NPS), U.S. Fish and Wildlife Service (FWS) and Bureau of Land Management (BLM). The regulations become effective September 23, 2013.

What about a new location fee schedule? Also published on August 22, 2013 was a proposed location fee schedule for commercial filming and still photography that would be adopted by the three agencies after public comment has been received and considered. Comments will be accepted for 30 days. This process could take 6 to 9 months.

Does the FWS have an interim fee schedule? No. Prior to the new law, BLM had existing state location fee schedules that had been through the Federal Register process which they were able to temporarily adopt. Mandated by GAO, the NPS adopted an interim fee schedule in 2007 based on the BLM/Nevada fee schedule.

When will the FWS be able to adopt a fee schedule? We are looking into implementing an interim fee schedule like the NPS, but if this is not possible it may take 6-9 months before we are able to adopt the new interagency location fee schedule that is currently being proposed.

What changes will take effect on September 23, 2013?

Commercial filming and still photography

- The regulation governing commercial filming and still photography is found at 43 CFR part 5 subpart A.
- New Definitions are found at 43 CFR 5.12, including definitions for commercial filming, model, news gathering activities, set and props, still photography.
- All commercial filming requires a permit.
- Most still photography activities will NOT require a permit.
- Still photography requires a permit if it uses models, sets, or props.
- Still photography may require a permit if it takes place in areas closed to the public, or the agency needs to manage the activity to minimize resource damage or visitor conflict.
- When a permit is issued for either commercial filming or still photography, cost recovery charges and a location fee based on the location fee schedule for that activity must be collected. (FWS currently does not have the authority to do so).
- 43 CFR 5.10 states that an applicant may appeal the denial of a permit application. The FWS will develop an appeals process and include it in new policy guidance forthcoming. For now, the applicant should submit a written appeal of the decision with reasons for reconsideration addressed to the individual who signed the denial letter. That individual should submit the reconsideration request to the next level of signature authority (i.e. Refuge Manager submits it to the Refuge Chief or the Refuge Chief submits it to the Regional Director). The decision of the senior individual is the final agency action.

News gathering activities

- News gathering activities may require a permit if the activities are of such size and scope that a permit would help manage the activity to minimize possible damage to park resources and visitor use conflicts or authorize entrance into a closed area.
- Even when the above circumstances are present, permits will be required only if there is sufficient time to issue the permit without impeding the crew's ability to gather the news. If there not sufficient time to issue a permit, visitor and resource protection will be managed verbally in the field.
- There are no cost recovery charges or location fees for permits issued for news gathering activities.

Audio Recording

- 50 CFR part 21.71 governs how the FWS will manage audio recording. Essentially, audio recording does not require a permit unless:
 - It takes place at a location where or when members of the public are generally not allowed;
 - It uses equipment that requires mechanical transport;
 - It uses equipment that requires an external power source other than a battery pack; or
 - The FWS would incur additional administrative costs to manage and oversee the permitted activity to:
 - Avoid unacceptable impacts and impairment to resources or values; or
 - Minimize health or safety risks to the visiting public.
- If a permit is issued, cost recovery must be collected, and a location fee based on the location fee schedule for still photography must be collected. (FWS currently does not have the authority to do so).

Denying a permit

A permit will be denied if the activity would:

- Damage resources;
- Unreasonably disrupt or conflict with the public's use and enjoyment of the site;
- Pose health or safety risks to the public;
- Result in unacceptable impacts or impairment to National Park Service resources or values;
- Violate the Endangered Species Act (7 U.S.C. 136, 16 U.S.C. 1531 et seq.), Wilderness Act (16 U.S.C. 1131-1136), or any other applicable Federal, State, or local law or regulation.

ELECTRONIC CODE OF FEDERAL REGULATIONS

e-CFR data is current as of July 5, 2018

Title 36 → Chapter I → Part 2 → §2.51

Title 36: Parks, Forests, and Public Property
PART 2—RESOURCE PROTECTION, PUBLIC USE AND RECREATION**§2.51 Demonstrations and designated available park areas.**

(a) *Demonstrations.* The term “demonstrations” includes demonstrations, picketing, speechmaking, marching, holding vigils or religious services, and all other like forms of conduct that involve the communication or expression of views or grievances, engaged in by one or more persons, the conduct of which is reasonably likely to attract a crowd or onlookers. This term does not include casual park use by visitors or tourists that is not reasonably likely to attract a crowd or onlookers.

(b) *Permits and the small group permit exception.* Demonstrations are allowed within park areas designated as available under paragraph (c)(2) of this section, when the superintendent has issued a permit for the activity, except that:

(1) Demonstrations involving 25 persons or fewer may be held without a permit within designated park areas, provided that:

- (i) None of the reasons for denying a permit that are set out in paragraph (f) of this section are present;
- (ii) The group is not merely an extension of another group already availing itself of the small group permit exception under this provision;
- (iii) They will not unreasonably interfere with other permitted demonstrations and special events, or park program activities; and
- (iv) Hand-carried signs may be used, but stages, platforms, or structures may not be used.

(2) While it is not mandatory, the organizer is requested to provide reasonable notice of the proposed event to the park superintendent, including whether there is any reason to believe that there may be an attempt to disrupt, protest, or prevent the activity.

(3) The 25-person maximum for the small group permit exception may be reduced for a designated available area, but only if:

- (i) A written determination that a 25-person group cannot be reasonably physically accommodated within that area is approved by the regional director; and
- (ii) The written determination is made available at the office of the superintendent and by public notice under §1.7 of this chapter.

(4) In the event that two or more groups taking advantage of the small group permit exception seek to use the same designated available area at the same time, and the area cannot reasonably accommodate multiple occupancy, the superintendent will, whenever possible, direct the later-arriving group to relocate to another nearby designated available area.

(c) *Designated available park areas.* (1) Locations may be designated as available for demonstrations under this section, and for the sale or distribution of printed matter and the free distribution of other message-bearing items under §2.52, only if these activities would not:

- (i) Cause injury or damage to park resources;
- (ii) Unreasonably impair the atmosphere of peace and tranquility maintained in wilderness, natural, historic, or commemorative zones;
- (iii) Unreasonably interfere with interpretive, visitor service, or other program activities, or with the administrative activities of the National Park Service;
- (iv) Substantially impair the operation of public use facilities or services of National Park Service concessioners, holders of commercial use authorizations, or contractors;

(v) Present a clear and present danger to the public health and safety; or

(vi) Be incompatible with the nature and traditional use of the particular park area involved.

(2) The superintendent must designate on a map, which must be available in the office of the superintendent and by public notice under §1.7 of this chapter, the locations designated as available for demonstrations, the sale or distribution of printed matter, and the free distribution of other message bearing items.

(d) *Application for permit.* A permit application must provide:

(1) The name of the applicant or the name of the organization (if any);

(2) The date, time, duration, nature, and place of the proposed event;

(3) An estimate of the number of persons expected to attend;

(4) A statement of equipment and facilities to be used;

(5) Whether there is any reason to believe that there will be an attempt to disrupt, protest, or prevent the event; and

(6) Any other information required by the permit application form.

(e) The superintendent must not accept an application more than one year before the proposed event (including time required for set-up); applications received more than a year in advance will be returned to the applicant.

(f) *Processing the application.* The superintendent must issue a permit or a written denial within ten days of receiving a complete and fully executed application. A permit will be approved unless:

(1) The superintendent has granted or will grant a prior application for a permit for the same time and place, and the activities authorized by that permit do not reasonably allow multiple occupancy of that particular area;

(2) It reasonably appears that the event will present a clear and present danger to public health or safety;

(3) The event is of such nature or duration that it cannot reasonably be accommodated in the particular location applied for, considering such things as damage to park resources or facilities, impairment of a protected area's atmosphere of peace and tranquility, interference with program activities, or impairment of public use facilities;

(4) The location applied for has not been designated as available under paragraph (c)(2) of this section;

(5) The application was submitted more than one year before the proposed event (including set-up); or

(6) The activity would constitute a violation of an applicable law or regulation.

(g) *Written denial of permit.* If a permit is denied, the superintendent will inform the applicant in writing of the denial and the reasons for it.

(h) *Permit conditions.* The permit may contain conditions reasonably consistent with the requirements of public health and safety, protection of park resources, and the use of the park area for the purposes for which it was established. It may also contain reasonable limitations on the equipment used and the time and area within which the event is allowed.

(i) *Permit duration.* (1) Permits may be issued for a maximum of 14 consecutive days.

(2) A permit may be extended for up to 14 days, but a new application must be submitted for each extension requested.

(3) The extension may be denied if another applicant has requested use of the same location and the location cannot reasonably accommodate multiple occupancy.

(j) *Violation prohibited.* Violation of these regulations or the terms of the permit is prohibited.

(k) *Permit revocation, termination of small group exception.* (1) The superintendent may revoke a permit for any violation of its terms and conditions.

(2) The superintendent may revoke a permit, or order a small group permit exception activity to cease, when any of the conditions listed in paragraph (f) of this section exist.

(3) The superintendent will make the revocation or order to cease in writing, with the reasons clearly set forth. In emergency circumstances the superintendent will make an immediate verbal revocation or order to cease, followed by written

confirmation within 72 hours.

[75 FR 64153, Oct. 19, 2010, as amended at 78 FR 37717, June 24, 2013; 80 FR 36476, June 25, 2015; 83 FR 2068, Jan. 16, 2018]

Need assistance?

ELECTRONIC CODE OF FEDERAL REGULATIONS

e-CFR data is current as of July 5, 2018

Title 36 → Chapter I → Part 2 → §2.52

Title 36: Parks, Forests, and Public Property
PART 2—RESOURCE PROTECTION, PUBLIC USE AND RECREATION**§2.52 Sale of printed matter and the distribution of printed matter and other message-bearing items.**

(a) *Printed matter and other message-bearing items.* The term “printed matter” means message-bearing textual printed material such as books, pamphlets, magazines, and leaflets, provided that it is not solely commercial advertising. The term “other message-bearing items” means a message-bearing item that is not “printed matter” and is not solely commercial advertising. Other message-bearing items include, but are not limited to: Readable electronic media such as CDs, DVDs, and flash drives; clothing and accessories such as hats and key chains; buttons; pins; and bumper stickers.

(b) *Permits and the small group permit exception.* The sale or distribution of printed matter, and the free distribution of other message-bearing items without asking for or demanding payment or donation, is allowed within park areas if it occurs in an area designated as available under §2.51(c)(2) and when the superintendent has issued a permit for the activity, except that:

(1) Sale or distribution activity by 25 persons or fewer may be conducted without a permit within designated park areas, provided that:

(i) None of the reasons for denying a permit that are set out in paragraph (e) of this section are present;

(ii) The group is not merely an extension of another group already availing itself of the small group permit exception under this provision;

(iii) The sale or distribution will not unreasonably interfere with other permitted demonstrations and special events, or program activities; and

(iv) Hand-carried signs may be used, but stages, platforms, or structures may not be used.

(2) While it is not mandatory, the organizer is requested to provide reasonable notice of the proposed event to the park superintendent, including whether there is any reason to believe that there may be an attempt to disrupt, protest, or prevent the activity.

(3) The 25-person maximum for the small group permit exception may be reduced for a designated available area, but only if:

(i) A written determination that a 25-person group cannot be reasonably physically accommodated within that area is approved by the regional director; and

(ii) The written determination is made available at the office of the superintendent and by public notice under §1.7 of this chapter.

(4) In the event that two or more groups taking advantage of the small group permit exception seek to use the same designated available area at the same time, and the area cannot reasonably accommodate multiple occupancy, the superintendent will, whenever possible, direct the later arriving group to relocate to another nearby designated available area.

(c) *Application for permit.* An application must provide:

(1) The name of the applicant or the name of the organization (if any);

(2) The date, time, duration, nature, and place of the proposed event;

(3) An estimate of the number of persons expected to attend;

(4) A statement of equipment and facilities to be used;

(5) Whether there is any reason to believe that there will be an attempt to disrupt, protest, or prevent the event; and

(6) Any other information required by the permit application form.

(d) The superintendent must not accept an application more than one year before the proposed event (including time required for set-up); applications received more than a year in advance will be returned to the applicant.

(e) *Processing the application.* The superintendent must issue a permit or a written denial within ten days of receiving a complete and fully executed application. A permit will be approved unless:

(1) The superintendent has granted or will grant a prior application for a permit for the same time and place, and the activities authorized by that permit do not reasonably allow multiple occupancy of the particular area;

(2) It reasonably appears that the sale or distribution will present a clear and present danger to the public health and safety;

(3) The number of persons engaged in the sale or distribution exceeds the number that can reasonably be accommodated in the particular location applied for, considering such things as damage to park resources or facilities, impairment of a protected area's atmosphere of peace and tranquility, interference with program activities, or impairment of public use facilities;

(4) The location applied for has not been designated as available under §2.51(c)(2);

(5) The application was submitted more than one year before the proposed event (including set-up); or

(6) The activity would constitute a violation of an applicable law or regulation.

(f) *Written denial of permit.* If a permit is denied, the superintendent will inform the applicant in writing of the denial and the reasons for it.

(g) *Permit conditions.* The permit may contain conditions reasonably consistent with the requirements of public health and safety, protection of park resources, and the use of the park area for the purposes for which it was established.

(h) *Permit duration.* (1) Permits may be issued for a maximum of 14 consecutive days.

(2) A permit may be extended for up to 14 days, but a new application must be submitted for each extension requested.

(3) The extension may be denied if another applicant has requested use of the same location and the location cannot reasonably accommodate multiple occupancy.

(i) *Misrepresentation.* Persons engaged in the sale or distribution of printed matter or the free distribution of other message-bearing items under this section are prohibited from misrepresenting the purposes or affiliations of those engaged in the sale or distribution, and misrepresenting whether the printed matter or other message-bearing items are available without cost or donation.

(j) *Violation prohibited.* Violation of these regulations or the terms of the permit is prohibited.

(k) *Permit revocation, termination of small group exception.* (1) The superintendent may revoke a permit for any violation of its terms and conditions.

(2) The superintendent may revoke a permit, or order a small group permit exception activity to cease, when any of the conditions listed in paragraph (e) of this section exist.

(3) The superintendent will make the revocation or order to cease in writing, with the reasons clearly set forth. In emergency circumstances the superintendent will make an immediate verbal revocation or order to cease, followed by written confirmation within 72 hours.

[75 FR 64154, Oct. 19, 2010, as amended at 78 FR 37717, June 24, 2013; 80 FR 36476, June 25, 2015; 83 FR 2069, Jan. 16, 2018]

Need assistance?

36 CFR 2.51 – PUBLIC ASSEMBLIES, MEETINGS

(e) The First Amendment Rights area is designated on a map as a “developed” zone (see attached map). The map is also available by contacting the Office of the Superintendent.

- A Special Use Permit must be obtained from the Office of the Superintendent for groups larger than 25 people.
- The authorized First Amendment activities area consists of from inside the front entrance gate, north to the starting edge of the woodlands zone, west to the starting edge of the parking lot entrance, and south to the starting edge of all Prairie Zones. This area includes all of the old administration/housing area of the park, but stops at the starting edge of all Prairie Zones.
- The picnic area is included in the designated First Amendment activities area.
- The following areas of the park are closed to First Amendment Rights (see attached map):
 - All Cultural Zone Areas (this area includes the visitor center and trail)
 - All Prairie Zone Areas
 - All Woodland Zone Areas
 - All Persimmon Grove Areas

Determination: The “developed” zone area has been determined the most appropriate area for First Amendment Rights activities. This area will accommodate large and small groups, is visible, but still allows the park to retain its responsibility to protect the park resources and to prevent conflicts among park visitors. The above mentioned closed zones are closed to First Amendment Rights activities for the maintenance of public safety, the protection of scenic values, and the protection of natural and cultural resources. George Washington Carver National Monument was established to preserve in public ownership historically significant properties associated with the life of George Washington Carver, and offers a place of learning and inspiration. The cultural, archaeological, historical, and natural resources within the park’s boundaries are to be preserved for the enjoyment of the park visitor within that preservation context.

36 CFR 2.52 - SALE OR DISTRIBUTION OF PRINTED MATTER

(e) The area designated for the sale and distribution of printed matter is designated on a map as a “developed” zone (see attached map). The map is also available by contacting the Office of the Superintendent.

- A Special Use Permit must be obtained from the Office of the Superintendent for groups larger than 25 people.
- The authorized First Amendment activities area consists of the from inside the front entrance gate, north to the starting edge of the woodlands zone, west to the starting edge of the parking lot entrance, and south to the starting edge of all Prairie Zones. This area includes all of the old administration/housing area of the park, but stops at the starting edge of all Prairie Zones.
- The picnic area is included in the designated First Amendment activities area.
- The following areas of the park are closed to First Amendment Rights (see attached map):
 - All Cultural Zone Areas (this area includes the visitor center and trail)
 - All Prairie Zone Areas
 - All Woodland Zone Areas
 - All Persimmon Grove Areas

Determination: The “developed” zone area has been determined the most appropriate area for First Amendment Rights activities. This area will accommodate large and small groups, is visible, but still allows the park to retain its responsibility to protect the park resources and to prevent conflicts among park visitors. The above mentioned closed zones are closed to First Amendment Rights activities for the maintenance of public safety, the protection of scenic values, and the protection of natural and cultural resources. George Washington Carver National Monument was established to preserve in public ownership historically significant properties associated with the life of George Washington Carver, and offers a place of learning and inspiration. The cultural, archaeological, historical, and natural resources within the park’s boundaries are to be preserved for the enjoyment of the park visitor within that preservation context.



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240

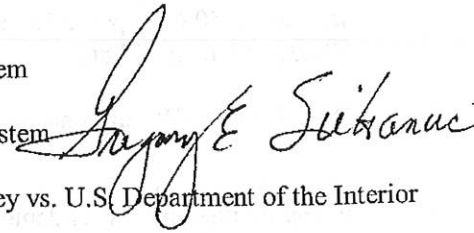


In Reply Refer To:
FWS/CLE/046364

OCT 1 2010

Memorandum

To: Regional Chiefs, National Wildlife Refuge System

From: Assistant Director, National Wildlife Refuge System 

Subject: Interim Regulatory Guidance Related to Boardley vs. U.S. Department of the Interior Decision

As follows is guidance for your managers and law enforcement officers resulting from a recent court decision. We have worked with Solicitor Kim Fondren devising this language to steer us through this transitional period. If you or any of your staff have any questions, please contact Chief, Division of Refuge Law Enforcement James Hall at (703) 358-1895.

On August 6, 2010, the U.S. Court of Appeals for the District of Columbia Circuit issued its decision in the case of Boardley v. United States Department of the Interior. The Court held that the National Park Service (NPS) general regulations for demonstrations and the distribution of printed materials found at 36 CFR 2.51 and 2.52 were unconstitutional in their entirety. The Court found that the regulations violated the First Amendment because they required individuals and small groups to obtain a permit before they could lawfully express their views in the designated free speech areas of the NPS. Importantly for the Refuge System, the Court recognized that the District Court had also found that the definition of demonstration activity used for the regulations was unconstitutionally overbroad and NPS eventually chose to not appeal that holding. In view of the similarities between NPS's regulatory definition of demonstrations and our own regulation found at 50 CFR 26.36, the Service needs to revisit these regulations. We need interim steps to address the situation on the ground while we develop a revised regulatory framework for addressing public assemblies and meetings within the Refuge System.

We are working in consultation with the Department of Interior Solicitor's Office now on how we should revise these regulations. In the interim, the following guidance applies:

**TAKE PRIDE[®]
IN AMERICA** 

1. We should not issue citations, nor should we make arrests for violations based on 50 CFR 26.36.
2. Officers should focus their efforts in policing demonstrations and public meetings on those sections of 50 CFR part 27 applicable to personal behavior, including but not limited to: 50 CFR 27.83, 27.84, and 27.86.
3. Outside area of Refuges not facilities.
4. In any incident involving demonstrations and group gatherings where First Amendment issues are raised; including arresting, relocating, or citing individuals, inform the Chief, Division of Refuge Law Enforcement (James Hall-703-358-1895, James_Hall@fws.gov) as soon as possible. Document all details related to such an incident with specificity in the Incident Report, which should accompany the notification to the Chief of Refuge Law Enforcement who will work directly with the Solicitor's office to assure that we meet all legal requirements.