

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

MAYOR & CITY COUNCIL OF )  
BALTIMORE, )  
 )  
Plaintiff, )  
v. )  
 )  
BUREAU OF ALCOHOL, TOBACCO, )  
FIREARMS AND EXPLOSIVES, )  
 )  
Defendant. )

Civil Action No.  
1:23-cv-03762-RDM

**NATIONAL SHOOTING SPORTS FOUNDATION, INC.’S CONSOLIDATED REPLY  
IN SUPPORT OF RENEWED MOTION TO INTERVENE AND MOTION TO FILE  
UNDER SEAL AND FOR A LIMITED PROTECTIVE ORDER**

National Shooting Sports Foundation, Inc. (“NSSF”) submits this consolidated reply in support of its renewed motion to intervene, (Doc. 26), and its motion to file under seal documents in supports of its motion to intervene and for a limited protective order, (Doc. 25).

Date: April 11, 2024

Respectfully submitted,

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## INTRODUCTION

Baltimore spends the bulk of its Opposition manufacturing procedural and jurisdictional hurdles to NSSF’s intervention. None of them warrants denial of either motion. NSSF has complied fully with this Court’s March 4 Minute Order and D.C. Circuit precedents regarding standing, intervention, and sealing judicial records. This Court should grant NSSF’s motions.

NSSF has associational standing to intervene because all of its member FFLs—or, at a minimum, its member FFLs that submitted declarations or responded to the survey—will suffer reputational and monetary injuries traceable to ATF’s disclosure of the information sought by Baltimore’s FOIA requests and redressable by a favorable judgment even if their own information is not ultimately disclosed. *See Susan B. Anthony List v. Driehaus*, 573 U.S. 149, 157–58 (2014). Baltimore “erroneously focuse[s] on the *extent* of . . . injury as opposed to the *existence* of one.” *Maryland Shall Issue, Inc. v. Hogan*, 971 F.3d 199, 210 (4th Cir. 2020). NSSF’s submission of declarations (Docs. 25-1, 25-2, 25-3) and survey responses (Doc. 26-3) “evidenc[es] the concrete injuries that individual member[] [FFLs] expect[] the [FOIA disclosure] would cause them to suffer,” which is sufficient for standing under D.C. Circuit law, even if that evidence does not disclose “the names of the” member FFLs. *Advocs. for Highway & Auto Safety v. Federal Motor Carrier Safety Admin.*, 41 F.4th 586, 594 (D.C. Cir. 2022). NSSF need only make a summary judgment showing of facts sufficient to support Article III standing—it has done so. *Lujan v. Defenders of Wildlife*, 504 U.S. 555, 561 (1992). This Court should conclude that NSSF has associational standing to protect its member FFLs’ right to prevent injurious disclosure of firearm trace data, lest that right be “nullif[ed] . . . at the very moment of its assertion.” *NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449, 459 (1958).

Baltimore also challenges intervention as of right and permissive intervention on other grounds, including impairment of protectable interests, adequacy of representation, and prejudice to existing parties. But none of those arguments has any merit. The Court should therefore grant NSSF's exercise of its right to intervene or, alternatively, allow NSSF to intervene permissively.

This Court also should grant NSSF's narrow request to seal the portions of the record that would disclose the names of its member FFLs that submitted declarations. Again, this is necessary to prevent "nullification" of member FFLs' right to non-disclosure "at the very moment of its assertion," *Patterson*, 357 U.S. at 459, and to prevent Baltimore and its anti-firearm allies from targeting and attacking NSSF's members. The *Hubbard* factors unquestionably favor sealing. *See Metlife, Inc. v. Fin. Stability Oversight Council*, 865 F.3d 661, 665–66 (D.C. Cir. 2017) (discussing *United States v. Hubbard*, 650 F.2d 293 (D.C. Cir. 1980)). This Court should grant NSSF's motion.

## **ARGUMENT**

### **I. NSSF has associational standing.**

NSSF demonstrated in its opening brief that, among other theories, it has associational standing to intervene on behalf of its member FFLs that will suffer certainly impending reputational and monetary harms. (Doc. 26-1 at 8). At a bare minimum, the member FFLs that submitted declarations or responded to the survey would have standing to sue in their own right, *see Advocs. for Highway & Auto Safety*, 41 F.4th at 594, and that remains true even if those specific FFLs are not named in the sought-after FOIA disclosures because their prospective injuries are not dependent on being individually named. Baltimore's counterarguments should be easily dispelled.

**A. Procedural Objection.** Baltimore objects to NSSF's filing of its renewed motion to intervene. (Doc. 31 at 12–13). That objection fails for several independent reasons. First, the Court's Minute Order denying NSSF's original motion invited further steps to cure any apparent

associational standing issues. (See Minute Order of Mar. 4, 2024 (“NSSF can file a motion . . . .”). NSSF’s renewed motion cures any such issues and, if nothing else, this reply focuses on the same issue addressed by the Court in its Minute Order: sufficient identification of members. Second, “[j]urisdiction existing,” the Supreme Court has explained, “a federal court’s ‘obligation’ to hear and decide a case is ‘virtually unflagging.’” *Sprint Commc’ns, Inc. v. Jacobs*, 571 U.S. 69, 77 (2013). Indeed, “[i]t is most true that this Court will not take jurisdiction if it should not: but it is equally true, that it must take jurisdiction if it should.” *Cohens v. Virginia*, 19 U.S. (Wheat.) 264, 404 (1821) (Marshall, C.J.). Third, the Court’s earlier denial for lack of standing is self-evidently not a prejudicial denial, *Jibril v. Mayorkas*, 20 F.4th 804, 813 (D.C. Cir. 2021) (“dismissal of the claims for lack of standing is not an adjudication on the merits”), and Baltimore cites no authority supporting its bare assertion that NSSF cannot cure an apparent *jurisdictional* issue.

**B. Injury.** NSSF submitted declarations and a summary of survey responses by specific, though unnamed, FFLs, which demonstrate that Baltimore’s sought-after disclosures will result in reputational and monetary injuries to its member FFLs. Baltimore does not contest that these are concrete injuries. See *TransUnion LLC v. Ramirez*, 594 U.S. 413, 417 (2021). Instead, it argues that NSSF has not sufficiently proven that identifiable members will suffer cognizable prospective injuries. All of its arguments should be rejected.

Baltimore contends that FFLs cannot base standing on reputational harms, (Doc. 31 at 17), and that a reputational harm is sufficient only if it brings “economic consequences,” (*id.* at 20). Both assertions are demonstrably wrong: decades of precedent affirm that a corporate entity’s standing may be based on a reputational injury without contemporaneous economic impact. See, e.g., *S. Mut. Help Ass’n, Inc. v. Califano*, 574 F.2d 518, 524 (D.C. Cir. 1977) (“an injury to the reputation of an organization such as [the corporate plaintiff] can serve as a basis for standing”);



*Joint Anti-Fascist Refugee Comm. v. McGrath*, 341 U.S. 123, 139 (1951) (plurality op.) (holding that charitable organizations had standing to challenge designations as “Communist” by Attorney General because of “damage [to] the reputation of th[e] organizations in their respective communities”); *Turkish Coal. of Am., Inc. v. Bruininks*, 678 F.3d 617, 622–23 (8th Cir. 2012) (holding corporate organization had standing to challenge “the labeling of its website as ‘unreliable’” based on reputational injury); *Riggs v. City of Albuquerque*, 916 F.2d 582, 583–85 (10th Cir. 1990) (holding that “politically active organizations” could sue based on “allege[d] harm to their personal, political, and professional reputations in the community”).

Baltimore argues next that NSSF’s declaratory and survey evidence do not sufficiently prove that its members will suffer cognizable prospective harms. To do so, NSSF need only show that a “threatened injury is ‘certainly impending,’ or there is a ‘substantial risk’ that the harm will occur.” *SBA List*, 573 U.S. at 158 (quoting *Clapper v. Amnesty Int’l, USA*, 568 U.S. 398, 414 & n.5 (2013)). There is no requirement that the feared injury be “literally certain.” *Clapper*, 568 U.S. at 414 n.5; see *Massachusetts v. EPA*, 549 U.S. 497, 525 n.23 (2007) (“[E]ven a small probability of injury is sufficient . . . provided of course that the relief sought would, if granted, reduce the probability.”). NSSF has provided “evidence of ‘specific facts’” that must be “taken as true,” *Lujan*, 504 U.S. at 561, and demonstrate that identifiable members will suffer cognizable prospective injuries as a result of Baltimore’s sought-after FOIA disclosures.

NSSF’s declarations and survey responses demonstrate that the release of ATF trace data will cause NSSF’s member FFLs to suffer the reputational injury of being wrongly labeled as facilitators of gun trafficking and crime, *TransUnion*, 594 U.S. at 432 (holding “[t]he harm from being labeled a ‘potential terrorist’” was a sufficient intangible harm), and the monetary injury of decreased firearm sales, *Craig v. Boren*, 429 U.S. 190, 194 (1976) (holding lost business

opportunity is a sufficient economic injury to support standing). (See Doc. 26-1 at 8–11 (summarizing the evidence)). Baltimore’s bald assertion that these harms are too speculative ignores evidence and common sense. After all, ATF has been forced to publicly warn against the harms that flow from erroneously associating FFLs identified in traces with having “committed criminal acts,”<sup>1</sup> and efforts by anti-firearm interest groups inviting citizens to draw flippantly erroneous “connection[s] between gun sellers and gun trafficking” are well documented.<sup>2</sup> NSSF has provided a record demonstrating “a *substantial risk* that the harm[s] will occur.” *SBA List*, 573 U.S. at 158 (quotation marks omitted) (emphasis added).

NSSF’s evidence is sufficient to support a summary judgment finding that “*all* the members of the organization are affected by the challenged activity.” See *Summers v. Earth Island Inst.*, 555 U.S. 488, 498–99 (2009). In any event, it is also enough that the declarations and survey responses “evidenc[e] the concrete injuries that individual member[] [FFLs] expect[] the [FOIA disclosure] would cause them to suffer,” even if “the names of” those member FFLs remain unknown. See *Advocs. for Highway & Auto Safety*, 41 F.4th at 594; see also *Speech First, Inc. v. Shrum*, 92 F.4th 947, 948–52 (10th Cir. 2024) (holding that organization had standing by relying on injuries to “Student A, Student B, and Student C”). That also remains true even if those specific FFLs are not ultimately named in the FOIA disclosure, because those FFLs will suffer the reputational and monetary harms regardless of whether they are individually named.

The D.C. Circuit’s decision in *Advocates for Highway & Auto Safety* is materially indistinguishable and instructive—and, if anything, NSSF’s evidence is stronger here. There, a

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<sup>1</sup> Bureau of Alcohol, Tobacco, Firearms and Explosives, Crime Gun Trace Analysis Report: The Illegal Youth Firearms Market in Detroit 17 (February 1999).

<sup>2</sup> Inside the Gun Shop: Firearms Dealers and their Impact, Everytown Research & Policy (July 6, 2023), <https://everytownresearch.org/report/firearms-dealers-and-their-impact/>.

labor union representing truck drivers sought to challenge certain requirements in an FMCSA final rule regarding recordkeeping and break requirements. *Advocs. for Highway & Auto Safety*, 41 F.4th at 588. Like NSSF, the union supported its standing by submitting “survey responses from specific, individual”—and unnamed—“members demonstrat[ing] that those members” would “be harmed by the new rule’s operation.” *Id.* at 593. The court held that those survey responses were sufficient for associational standing because they “evidenc[ed] the concrete injuries that individual members expected the rule would cause them to suffer,” *id.* at 594, even though the union submitted no affidavit evidence and the court “d[id] not know the names of the individuals in the survey,” *id.* at 593–94. NSSF has demonstrated standing in exactly the same way, with the added benefit of declaratory evidence further demonstrating the prospective injuries that its members will face on account of Baltimore’s FOIA request. Baltimore almost entirely ignores *Advocates for Highway & Auto Safety*, which compels the conclusion that NSSF has associational standing.

Similarly instructive is *NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958), where the Supreme Court held that the NAACP could challenge the compelled production of its entire membership because requiring litigation “by the members themselves would result in nullification of the right [to non-disclosure] at the very moment of its assertion.” *Id.* at 459. NSSF seeks to vindicate nearly a identical right for its members: to avoid the public disclosure of FFLs who have any connection to a firearm recovered in connection with criminal activity in Baltimore. Like *Patterson*, NSSF “and its members are in every practical sense identical,” *id.*, but even if they were not, the need to prevent similar nullification of the rights at issue is plenty reason to permit associational standing, which in any event is merely “a prudential matter,” *Sec’y of State of Md. v. Joseph H. Munson Co.*, 467 U.S. 947, 956 (1984).

**C. Traceability.** Baltimore challenges traceability by arguing that the FFLs' harms depend on the decisions of "various different groups of actors." (Doc. 31 at 19). The Supreme Court has held that traceability exists, despite dependence "on the independent action of third parties," if those "third parties will likely react in predictable ways." *Dep't of Com. v. New York*, 139 S. Ct. 2551, 2565–66 (2019). The third-party conduct need only be "likely attributable at least in part" to the challenged conduct. *Id.* at 2566. NSSF has made that showing. For example, that ATF has warned against associating FFLs named in traces with criminality demonstrates that the reputational and monetary harms they suffer are based on "predictable" reactions. *See supra* n.1 (citing ATF's admonitions). That anti-firearm interest groups and certain municipalities regularly target FFLs based on gun-trace data demonstrates the predictable—and *intended*—reaction of associating named FFLs with wrongdoing. (*See* Doc. 23 at 6–7). And that interest groups expressly invite such "connections," *see supra* n.2, conclusively demonstrates that the harms member FFLs seek to avoid are the predictable and intended results of any FFLs being named in trace data.

**D. Redressability.** Baltimore challenges redressability because "certain crime gun trace information is already regularly made public." (Doc. 31 at 21). A plaintiff need not "show that a favorable decision will relieve his *every* injury." *Larson v. Valente*, 456 U.S. 228, 243 n.15 (1982). It is enough "that a favorable decision will relieve a discrete injury," *id.*, and even "a partial remedy" suffices, *Uzuegbunam v. Preczewski*, 141 S. Ct. 792, 801 (2021). A favorable judgment would wholly prevent the disclosure of different and additional reputational and economic injuries that stem from each disclosure. That is enough for redressability and standing.

**II. Baltimore's other arguments against intervention as of right fail.**

NSSF has shown that it has cognizable interests in the subject matter of this action for the same reasons it has standing and that denying intervention “*may* as a practical matter impair or impede [NSSF’s] ability to protect [its] interests.” *Fund for Animals, Inc. v. Norton*, 322 F.3d 728, 735 (D.C. Cir. 2003). Baltimore argues that “disposition of this lawsuit would not impair any” interests, but it offers nothing valid to support that assertion. (Doc. 31 at 28–29). And the relentless ferocity of Baltimore’s opposition to NSSF’s intervention strongly suggests that it actually believes otherwise. “[T]here is no question that the task of reestablishing the status quo if [Baltimore] succeeds in this case will be difficult and burdensome.” *Fund for Animals, Inc.*, 322 F.3d at 735. Reversing the harms associated with public disclosure of trace data might prove impossible—and that is precisely what Baltimore intends to accomplish.

Baltimore also argues that NSSF’s interests are adequately represented by ATF. (Doc. 31 at 29). But that too is wrong: NSSF has met its “minimal” burden of showing that representation “may be inadequate.” *See Fund for Animals, Inc.*, 322 F.3d at 735, 737 (quotation marks omitted). ATF has not taken the same positions as NSSF. And ATF does not share NSSF’s ultimate objective of preventing reputational and economic injuries to NSSF’s member FFLs. Even if “[t]here may be some overlap,” NSSF’s “interests plainly are not adequately represented by the federal defendants.” *Id.* at 736. NSSF fully satisfies each element for intervention under Rule 24(a)(2). The Court should therefore grant NSSF’s exercise of its right to intervene.

**III. In the alternative, this Court should permit NSSF to intervene permissively.**

Should this Court disagree that NSSF is entitled to intervene as of right, it should exercise its discretion to permit NSSF to intervene permissively. NSSF has standing, and its motion is procedurally proper. NSSF’s participation would contribute to the full development of the issues

in this suit, and Baltimore cites no authority for the proposition that permissive intervention should be denied merely because intervention would add a new issue to the case. *See, e.g., New Orleans Pub. Serv., Inc. v. United Gas Pipe Line Co.*, 732 F.2d 452, 472 (5th Cir. 1984) (instructing courts to consider whether intervention “will significantly contribute to full development of the underlying factual issues in the suit” (quoting *Spangler v. Pasadena City Bd. of Educ.*, 552 F.2d 1326, 1329 (9th Cir. 1977))). Nor has Baltimore shown that intervention would meaningfully prejudice existing parties; after all, NSSF intends to comply with the existing briefing schedule.

**IV. This Court should grant NSSF’s motion for leave to file documents under seal and for a limited protective order.**

This Court should grant NSSF’s narrow request to seal the portions of the record that would disclose the names of its member FFLs that submitted declarations. Sealing those minor portions of the declarations is necessary to prevent “nullification” of the right to non-disclosure “at the very moment of its assertion,” *Patterson*, 357 U.S. at 459, and to deter Baltimore from attacking NSSF’s members. As set forth below, the factors set forth in *Hubbard*, 650 F.2d at 317–22, favor sealing.

First, there is no “need for public access” to the names of the FFLs. *Metlife, Inc.*, 865 F.3d at 665. Although access “serves the important function[] of ensuring the integrity of judicial proceedings,” *id.*, the fact that NSSF is openly representing those members ensures such integrity. All NSSF seeks to seal is the FFLs’ names, for which there is no public need for disclosure.

Second, there has been no “previous public access” to the FFLs’ names or the declarations. *Id.*; *Hubbard*, 650 F.2d at 317 (asking “whether, when[,] and under what conditions” documents have been available); *Kartte v. Davis*, 2022 WL 2904173, at \*4 (D.D.C. July 22, 2022).

Third, NSSF “has objected to disclosure,” which supports sealing. *EEOC v. Nat’l Childrens Ctr., Inc.*, 98 F.3d 1406, 1410 (D.C. Cir. 1996); *Zapp v. Zhenli Ye Gon*, 746 F. Supp. 2d 145, 149 (D.D.C. 2010). Baltimore ignores this factor.

Fourth, the strength of the privacy interests asserted strongly supports sealing. Sealing the names of the declarants prevents “nullification” of the member FFLs’ rights “at the very moment of [their] assertion.” *Patterson*, 357 U.S. at 459.

Fifth, disclosure of the FFLs’ names raises a possibility of legal prejudice because it nullifies the anonymity that they seek to protect in this case and risks mooting their standing theory.

Sixth, although the declarations were introduced to support NSSF’s associational standing, the identity of the FFLs is irrelevant to NSSF’s intervention. The “names of the” FFLs are not necessary to establish standing. *Advocs. for Highway & Auto Safety*, 41 F.4th at 594.

For these reasons, the Court should conclude that NSSF has demonstrated that the *Hubbard* factors favor sealing and that NSSF has shown good cause for a protective order.

### **CONCLUSION**

This Court should grant NSSF’s renewed motion to intervene and its motion to file under seal documents in supports of its motion to intervene and for a limited protective order.

Date: April 11, 2024

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**CERTIFICATE OF SERVICE**

I certify that on April 11, 2023, the foregoing document was served, via the Court's CM/ECF Document Filing System, upon the registered CM/ECF users in this action.

*/s/ John Parker Sweeney* \_\_\_\_\_  
John Parker Sweeney