Worldwide Privacy Regulations Restricting Access to Genealogical Records

Jan Meisels Allen
Genealogists without records can’t do genealogy!

We are facing crises worldwide on access to vital records due to misunderstandings by those in power about identity theft and fraud and due to budget cuts.
Someone's right to keep their personal matters and relationships secret
Why Do We Care About Privacy?

There are many people who value their privacy, and wouldn't dream of posting personal information about themselves or their family where everyone can see it. Some of those people are my cousins, and some of them are your cousins - but how could you and I hope to connect with them online given their concerns?
Do You Want Your Information Available to Everyone?

We want others to provide information to us.

Do we want our personal information posted to the Internet?
### European Union Members

#### 28 Countries

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European Union - 2

- 28 Countries until BREXIT takes place - 29 March 2019
- 500 million residents
- Right to be forgotten/erased
- Google has ~90% of Search Engine Market in Europe-varies by country
- Since May 29, 2014 Google received 698,395 requests to delink from 2,615,742 URLs. They did not remove 44 percent of the URLs requested.
- Fall 2016 CJEU ruled hyperlinking by third-party website (search engine) without consent of holder constitutes a "communication to the public“ and doing so is a violation of EU copyright directive.
The protection of persons in relation to the processing of their personal data is a fundamental right laid down in the Charter of Fundamental Rights of the EU (Article 8) and in the Treaty on the Functioning of the European Union (Article 16).
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<th>United States</th>
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<td>Privacy takes precedence over freedom of speech and press.</td>
<td>US Constitutional rights of freedom of speech and press take priority over individual’s privacy. Right to privacy <strong>NOT</strong> mentioned in Constitution</td>
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General Data Privacy Regulation (GDPR) adopted May 2016

- 3,999 amendments.
- Single system across all EU countries.
- Codified right to be forgotten.
- Individuals must give their “clear and affirmative consent” before companies or governments can process their private data.
- The GDPR also features a concept known as "privacy by design" to protect privacy of data subjects. (Privacy is integrated into the design of the technology.)
• General Data Privacy Regulations do not apply to deceased individuals.
• Holocaust and war crimes records to be made available.
• Government and private repositories **have a legal obligation** to acquire, preserve, appraise, arrange, describe, communicate, promote, disseminate and provide access to records of enduring value for general public interest.
• The GDPR applies to all companies processing the personal data of data subjects residing in the European Union. This means that the GDPR applies to the processing of personal data by controllers and processors in the European Union, without regard to whether the processing actually takes place within the European Union.
• Data from EU residents may not be transferred to the U.S.
EU Commission Proposes e-Privacy Regulation for All Electronic Communications EU-7

• Proposed privacy rules for all electronic communications: WhatsApp, Facebook Messenger, Skype, Gmail, I Message and -ePrivacy Regulation
• 92 percent of Europeans say it is important that their emails and online messages remain confidential. The proposed regulation will establish one single set of rules across the EU.
• Privacy will be protected the same was as in the EU 28 countries under the GDPR.
• Did not get adopted at same time as GDPR and still being considered
European Union -8
Data Transfer Agreement

- 15-year “Safe Harbor” Data Transfer Agreement between the EU and US invalidated by the CJEU due to litigation brought by Max Schrems. Affects 4,500 businesses, including Facebook, Google, Microsoft, Amazon and Twitter.
- New “Privacy Shield” Agreement between EU and US approved by EU Commission and signed in July 2016. Affects close to 4,000 businesses in data transfer between EU and USA.
- July 5, 2018 EU Parliament adopts resolution calling for the suspension of the EU-US Privacy Shield data transfer agreement by September 1, 2018 if the United States is not fully compliant with level of protection required by the General Data Protection Regulation as interpreted by the European Court of Justice.
European Union -9
Data Transfer Agreement

- US 2nd Circuit Federal Appeals Court ruled that the government can’t force Microsoft to turn over emails or other personal data stored on computers overseas. Four other jurisdictions found otherwise. US Government requested their appeal be heard by US Supreme Court. US Supreme Court did not hear case as it was withdrawn by plaintiffs since its moot due to CLOUD Act enactment requiring internet companies to hand over to law enforcement agencies personal data regardless where it is stored.

- January 2017, Presidential Executive Order, Enhancing Public Safety in the Interior of the United States excludes persons who are not U.S. citizens or lawful permanent residents from the protections of the Privacy Act regarding personally identifiable information. Concern for EU not to dismantle Privacy Shield.

- October 2017, Irish High Court sends case to CJEU asking if Privacy Shield meets EU requirements emanating from Schrems’ litigation against Facebook. Facebook appealing.
Facebook Issues

- In Feb 2016, a French Court found that a case brought against Facebook can be heard in France, rather than in California, ignoring Facebook terms of agreement which requires all litigation to be heard in California.
- Litigation by Max Schrems (Austria) taken to Ireland-then Court of Justice EU results in invalidation of Safe Harbor trans-Atlantic 15-year agreement.
- Belgium Court of Appeals said the Belgian courts do not have jurisdiction over Facebook’s collection and processing of data from users in Belgium as Facebook is an American company that bases its European operations in Ireland. CJEU determines Schrems must sue in Ireland but no class action permitted in Austria.
- German High Court Ruled that parents may obtain Facebook of deceased minor daughter determining inheritance rights supersede privacy rights. (2018)

Google Issues

- July 2018, Google fined record $5 billion for android phone anti-trust reasons on its search and apps methodology. Android market share is 75% of EU phones.
- April 2018, decision in the UK against Google requiring them to remove links to a convicted felon.
- July 2017, CNIL decreed French Court decision is global (extraterritorial). Conseil d’Etat France’s highest administrative court refers case to CJEU -- still awaiting decision.
- March 2016, Spain Supreme Court opined the parent company located in the US may do something as the data controller, the parent, Google, Inc., is subject to the data handling regulations even if it is located outside the EU.
- Google is the decision-maker as to what is removed and what stays.
The Right to be Forgotten
Right to be Forgotten (RTBF)

RTBF is the removal of public information (delinking or deindexing) from search engines such as Google or from the entire internet. The original source of material is still there, but without a search engine it will be almost impossible to find the specific information. Requesting a link to a newspaper article, journal article, etc., might reveal factual information which the subject person would prefer not be found. Examples could be criminal convictions, arrests without convictions, bankruptcy filings. RTBF can lead to "censorship" of information and is a way to "erase" history.
Right to be Forgotten

• As genealogists we want the information. We don’t want history erased. Where does privacy begin and end? What are our responsibilities for ethics in our genealogy?
• Different country laws vary—in US First Amendment rights prevail yet we have examples of RTBF here.
• When Canada decided and perhaps CJEU (Referred by France’s Court) decides their rules are extraterritorial which country prevails with their laws?
• France adopts law to erase postings when person was a minor (Nov. 2016)
## Right to be Forgotten

### European Union

- Privacy takes precedence over freedom of speech and press.
- 2014 Court of Justice of EU (CJEU) ruling establishing right to be forgotten—for search engines. Google removed 43% of URLs out of 2.4 million URLs 5/2014-2/2018.
- GDPR approved in 2016 "codifies" RTBF.
- Court case pending to CJEU referred by France’s highest administrative court regarding extraterritoriality.
- Germany trying to expand RTBF to social media orgs with new law July 2017.
- Other litigation against Facebook, Google, WhatsApp, Microsoft, and more.
- Russia enacts RTBF January 2016

### United States

- US Constitutional rights of freedom of speech and press prevail over individual’s privacy.
- CA Supreme Court-Yelp—Section 230 Communications Decency Act. Yelp does not have to remove "defamatory" write-up by poster.
- Bill in New York State Assembly authorizing RTBF AO 5323.
- CA law for minors to “erase” online postings since 2015 (SB 568 enacted 2014).
- Consumer Watchdog petition to FTC requesting RTBF - 2015
- Increased government scrutiny over Internet companies due to Facebook-Cambridge Analytics and other issues
French High Court

May 2016

*French Court: Cour de Cassation Decision:*

The right to be forgotten does not supersede the freedom of the press.

Belgium High Court

April 2016

*Belgium Court: Cour de Cassation Decision:*

Freedom of expression is not absolute and may be subject to other rights, such as the right to privacy, including the right to be forgotten. The court extended the right to be forgotten to online newspaper archives, applicable only in Belgium.
France’s Court Refers Case on RTBF and Extraterritoriality to Court of Justice of European Union

- July 2017, the Conseil d’Etat refers case to CJEU on whether ordering delinking by the French CNIL has authority for rule of law to be extraterritorial.

- The case stems from a dispute between Google and the CNIL over whether Google must delink references outside of France to the entire world. This is a precedent setting case. If the Court finds for CNIL, Google and all search engines must delink worldwide; it could upset laws of different countries creating a global censorship.
Canada

- June 2017 Canadian Supreme Court opined Google must remove search links to worldwide not just Canada. Split decision. *Google Inc., V. Equustek Solutions Inc.*
- Google wins in US Federal Court with injunction being told not to comply with Canada’s ruling as Canadian decision violates US law.
- January 2018 Office of Privacy Commissioner Releases Draft Position on Online Reputation-Agrees Advocates De-Indexing and Source Takedown (Right to be Forgotten)
- June 2018 Committee Members of Parliament Recommend Expanding Data Protections and Empowering Privacy Commissioner
June 2017 Canada’s Supreme Court Rules “The internet has no borders – its natural habitat is global. The only way to ensure that the interlocutory injunction attained its objective was to have it apply where Google operates – globally.”

Their decision against Google must be enforced worldwide. How does this affect different countries’ own laws, such as Freedom of Press and Speech in US? One of the fundamentals of Western law is the concept of jurisdiction. Does Canada have jurisdiction outside of Canada?

July 24 Google filed for injunction in US Federal Court against Canadian Supreme Court as violates US Law-and won.

Google: “...could lead to a global race to the bottom, harming access to information that is perfectly lawful to view in one’s own country …

Tampa Bay Times; Cleveland.com Editorial Boards institute RTBF
Right to Be Forgotten Worldwide

**Adopted RTBF**
- Argentina
- European Union
- India
- Mexico
- Peru
- Russia
- South Korea
- Turkey

**Declined RTBF**
- Brazil-not on search engines
- China (Beijing Court in 2016)
- Indonesia-not from press institutions
- Japan
Databases Lost Thus Far Due to EU GDPR

- 450,000 Records Removed From Online Access at Dutch Archives—such as the Tilburg Regional Archive online family cards collection dating from 1920-1940; other branches including Amsterdam, Alkmaar, Eemland and more have removed data from the Internet.
- World Famous Network Y-DNA project ceased operation
- Y-Search and Mitosearch projects of FamilyTree DNA were closed the end of May. While the announcement did not state they were closing due to the GDPR, the timing is at least "curious."
What About Access to Vital Records?

• We want access to birth, marriage & death records and more for our genealogy
• Legislators and regulators are impeding our access by:
  - limiting which relatives may obtain the records
  - Imposing lengthy embargo dates to access records

No (US) state without embargo dates for vital records has a greater incidence of identity theft than those with embargo dates.
While the US Constitution guarantees freedoms of speech and press there is a growing interest in the right to be forgotten in the US. The U.S. Constitution does not specify the right to privacy. However, the U.S. Supreme Court through its decisions and the 14th amendment "liberty" guarantee has broadly granted the right to privacy in some of its decisions.

88 percent of Americans support a US law that would allow a "right to be forgotten" and let them petition companies such as Google, Bing and Yahoo to remove certain personal information. (Benson Strategy Group)

US Administration Explores Voluntary Alternatives to GDPR privacy regulations

Multiple lawsuits against US Census Bureau on adding citizenship question to 2020 US Census

Pending Privacy Legislation in US Congress

NYC DoH&MH Adoption of embargo dates for vital records
California Privacy Law

- Avoiding a ballot initiative this November the California Legislature adopted a new law within days of introduction and signed by the governor - the strongest privacy law in USA to date. (AB 375). Effective January 1, 2020.
- Grants the consumer the right to request a business to disclose pieces of personal information that it collects;
- Grants the consumer the right to request to delete personal information and for the business to delete that information upon request;  Note: not deleting from search engines;
- Permits the consumer to opt out of the sale of personal information and prohibiting the business from "punishing" the consumer; and
- Defines "personal information" as something that identifies and relates to the consumer including biometric information, geolocation information audio, electronic, thermal information and more.
HR 5615/ S 2639 CONSENT Act—Customer Online Notification for Stopping Edge-provider Network Transgressions --Partisan Bill no action

- Edge providers are those on the internet that require subscriptions for memberships or consumer searches through the website.
- Requires edge providers to notify consumers of data breaches; types of data collected; purpose of data collection; opt-in for provider to give consent for sale or use of personal data; use proprietary consumer data in unidentifiable format; prohibited from “punishing consumer” if they do not provide consent, etc.
US Repeals Internet Privacy Protections

• November 2016, FCC adopts new privacy rules to protect individuals’ digital information—websites and apps.
• Would require the broadband providers to get prior approval to collect and share data on web browsing.
• In April 2017, President Trump signed bill into law that over turned the November FTC rule regarding privacy of broadband telecommunications customers.
• In 2016, the United States government sent at least 49,868 requests to Facebook for user data. In the same time period, it sent 27,850 requests to Google and 9,076 to Apple.1 (Electronic Frontier Foundation)
New York State

- In 2017, NY State Legislature had two bills (SB 4561, AO 5323) establishing right to be forgotten. Senate author withdrew bill as recognized violation of freedom of press and speech under US Constitution.
- In 2018, Assembly AO 5323 was referred to the Assembly Committee for Government Operations. No action taken in 2017 and none thus far in 2018.
- In 2017, companies and other entities reported 1,583 data breaches to NYAG exposing 9.2 million NYers. Quadruple the number of New Yorkers impacted in 2016.
On March 13, NYCDoH&MH adopted their new regulation for access to birth and death records once they are transferred to DORIS (municipal archives). Does not affect records already transferred.

- Birth: 125 years from date of birth
- Death: 75 years from date of death
- Over 5,000 comments opposed the proposed rule. Only two comments were in favor: NYSDoH and NAPHSIS—all others opposed.
- NYSDoH considering adopting same time lines
- NYGBS takes lead in genealogical response. Establishes committee: NY-RPAC
June 2018, NYCDoH&MH adopted new regulation amending Health Code allowing certain direct descendants and other family members to access the birth and death records of deceased relatives without waiting for newly imposed embargo period.

Family members added: Great-grandchildren, nephews, nieces, aunts, uncles, grandnephews and grandnieces, and to allow spouses, domestic partners, parents of a children (sic) over the age of 18, children, siblings, grandchildren, great-grandchild, grandnieces, and grandnephews.

Effective January 1, 2019 to permit time for establishing procedures.
Where NYCDoH&MH Learned About the Embargo Periods-2011 Model Vital Records Act

- Developed to serve as a model for states in preparing laws and regulations on the collection and publication of vital statistics.
- Embargo periods to 125 years after the date of a live birth, 75 years after the date of death, and 100 years after the date of marriage or divorce. Records and indexes.
- Department of Health and Human Services (HHS) put the 2011 Revision “on hold” in April 2012
- The National Association for Public Health Statistics and Information Systems (NAPHSIS) endorsed the Model Act in 2011
Facebook, Google, Microsoft Under Siege in EU

• Genealogists rely on search engines and social media for reaching out in their research.
• The EU has fined and litigated against the US-based companies for differences in privacy, anti-trust and other issues.
• Within minutes of the GDPR becoming effective, litigation was brought by Schrem’s NoYB against Facebook, Google, WhatsApp and Instagram. “informed and specific consent” (GDPR) vs. “forced consent”.
• In July 2017, Germany enacted legislation with substantial fines for permitting “fake” news and hate messages to be posted. Facebook, YouTube and other sites with at least two million users in Germany are affected by the new law. Social media sites must remove “obviously illegal” content within 24 hours after receiving complaint or notification.
• CJEU ruled that a regulator (Germany) was entitled to exercise its powers even if the collection and data processing belonged to the company’s (FB) establishment in another EU country-Ireland—case predated “one-stop shopping” in GDPR.
• Nine European news outlets are demanding that social media companies such as Facebook, Google, Snapchat, Twitter, pay copyright fees for using news content.
Facebook

• October 2015, Litigation against Facebook resulted in invalidation of “safe harbor” for transferring data to US.
• May 2017, France’s data regulator fined Facebook for privacy violations regarding tracking users and non-users for advertising.
• May 2017, European Commission fined Facebook €110 million over providing misleading information about its acquisition of WhatsApp—and sharing the user’s data with parent Facebook.
• May 2017, Austrian court ruled that Facebook must take down specific posts that were considered hateful toward the country’s Green party leader.
• July 2017, US Court in California dismissed case against Facebook for tracking user’s activity saying it was the user’s responsibility to keep their browsing history private. Exact opposite of France’s determination.
• February 2018, German regional court finds Facebook's Use of Personal Data Is Illegal
Google

- EU fines Google $5 billion for Android phone and orders them to change method they use for searches and apps on phones. Google Android has 75% market share.
- Danish and Italian Data Regulators limiting how long Google may store personal data
- France’s CNIL orders worldwide take down of Google links—Conseil d’Etat refers case to CJEU re: extraterritoriality.
- EU Commission fines Google $2.7 billion USD for directing its users to its own shopping comparisons—anti-trust actions
- Germany taking Google to CJEU on copyright infringement—wants Google to pay newspapers when their links are displayed online
- Google’s MyActivity permits user to delete their search history
EU fined Microsoft regarding antitrust violations in compliance for offering users more choice of Internet browsers

CNIL served a formal notice on Microsoft asking to review its policy on collecting user information within three months and to comply with the French data protection legislation regarding confidentiality of user data.
Who Should Be the Decision-Maker As to What Is Removed from Internet?

• Under the EU Court of Justice 2014 decision and the General Data Protection Regulation, the search engines: Google, Bing, Yahoo, etc. are the entities that make the decision of what should be removed upon petition, or what stays.
• Is it public law that should decide or these private entities who are enforcing a government law?
• Don’t you want to know whether a prospective baby sitter may have been a sex offender? What about collaborators during WWII? If all records are expunged, what happens to the public’s right to know?
• What happens to the global internet when 192 countries with different cultures have sharply diverging definitions of what is acceptable online speech? What happens when one country's idea of acceptable speech clashes with another's idea of hate speech?
IAJGS Code of Conduct/Ethics

• Revised 2017 http://www.iajgs.org/blog/code-of-conduct
  “While understanding the privacy concerns of both the public and governmental agencies, the IAJGS will continue to advocate for access to all records relevant to genealogical research. Individual genealogists should respect requests made by persons asking that certain information about themselves or family members be kept private.”
• “More recent data should be evaluated in the light of sensitivities of the living versus the importance of disseminating information.”
• “Generally, requests made to genealogical researchers should be respected when individuals ask that certain information about themselves or family members be kept private.”
IAJGS Public Records Access Monitoring Committee 2018

- Jan Meisels Allen, Chair, PRAMC, JGS of Conejo Valley and Ventura County
- Teven Laxer, JGS Sacramento
- Herbert “Bert” Lazerow, Esq. San Diego JGS
- Mark Nicholls, JGS Great Britain
- Paul Silverstone, JGS, Inc. (New York)
- Catherine Youngren, Jewish Genealogical Society of British Columbia
- Ken Bravo *ex officio*, President IAJGS
IAJGS Records Access Alert

• Announcement list for all public records access issues
• Public Records Access Alerts are no longer on IAJGS Leadership Forum
• Often, there are different messages than what are posted on JewishGen. Alerts include advocacy, when appropriate. JewishGen policy prohibits advocacy
• Anyone may subscribe – it’s recommended that each society have at least one subscriber
• 281 alerts since last year’s conference
• To subscribe go to: records-access-alerts.iajgs.org and follow instructions
• Please send notices and comments to: PRAMC@IAJGS.org
PRAMC Annual Report

To: IAJGS Members—2018 Annual Session

From: Jan Meilsa Allen, Chairperson, IAJGS Public Records Access Monitoring Committee

Re: Public Records Access Monitoring Committee—Annual Report

Date: June 1, 2018

Committee Members 2017-2018
Jan Meilsa Allen, Chairperson, Agoura Hills, California
Bert Latzer, San Diego, California
Teven Lauer, Sacramento, California
Mark Nichols, Edgeware, Middlesex, London, UK
Paul Silverstone, New York, New York
Catherine Youngren, Coquitlam, British Columbia, Canada
Ken Bravo, ex officio, President, IAJGS, Cleveland, Ohio

The Public Records Access Monitoring Committee (PRAMC) had a busy year monitoring and addressing issues affecting access to public records.

The IAJGS PRAMC added a new committee member this year: Herbert “Bert” Latzer, who is a Professor of Law, University of San Diego and a member of the San Diego JGS. We are delighted to have Bert join as an ex officio member. He brings knowledge and expertise that greatly enhances the overall work of the committee.

Access to vital records, census documents and other records is essential to the ability of genealogists to research family histories—whether as a business or a personal hobby.

In some instances, PRAMC monitors legislation and regulations rather than taking action in order to assess whether action may become necessary. Information is posted on the IAJGS Records Access Alert as soon as it becomes available.

JewishGen

PRAMC is no longer permitted to post notices about pending matters on JewishGen as per the JewishGen Operations Committee rules, set three years ago, if the action is not a final adoption of a law, rule or court decision.

We are permitted to post a monthly one-line summary of postings on the IAJGS Records Access Alert the beginning of the following month. For example, the JewishGen posting in the first week of June 2018 covered the IAJGS Records Access Alert postings for all of May 2018. It is of the utmost importance that at least one member of each society subscribe to the Records Access Alert in order for societies to keep apprised of critical actions affecting records access.

We hit an all-time high of 736 subscribers earlier this May. However, wherever there are postings about the European Union’s General Data Protection Regulation (GDPR) and/or the right to be forgotten (RTBF) we lose a few subscribers who might be questioning the relevancy of our postings. As IAJGS is an international organization, PRAMC believes it is critical that the IAJGS Records Access Alert covers the entire globe, not just North America. The “right to be forgotten” has started to raise its specter in Canada and the United States. Every genealogist should be aware and concerned about the right to be forgotten as a way by which our history can be erased.

The GDPR became effective on May 25, 2018 (see below). Now, the issue of privacy has become even more relevant. The PRAMC continues to review access to vital records and census records that result from government action worldwide and carefully selects issues on which IAJGS may take a proactive stance.

How You Can Help

• Register for the Records Access Alert
  • records-access-alerts.iajgs.org
• Be alert to issues, proposed legislation, and local news that could affect access to public information.
• Write letters/emails to your Representatives.
• Ask your state and local genealogical societies to spread the word.
• Keep in contact with PRAMC – pramc@iajgs.org