



March 18, 2021

Disclosure Division
Bureau of Alcohol, Tobacco, Firearms and Explosives
Information Privacy and Governance (IPG) Division, Room 4E.301
99 New York Avenue, NE
Washington, DC 20226

RE: City of Baltimore Gun Trafficking Intelligence Platform
Freedom of Information Act (FOIA) Request
VIA EMAIL: FOIAMail@ATF.gov

To Whom it May Concern,

Pursuant to the Federal Freedom of Information Act, 5 U.S. Code § 552 (hereinafter "FOIA"), I submit the following request for documents from the Bureau of Alcohol, Tobacco, Firearms and Explosives (hereinafter "ATF"). If the requested documents are not available from ATF, I respectfully ask that you forward this request to the appropriate agency that maintains the requested records or advise me of the identity of any such agency.

Status of Requester: I am a representative of Firearms Policy Coalition (FPC), a public interest law and policy organization dedicated to defending and advancing individual liberty, freedom, and the right to keep and bear arms. As a result, I am requesting a fee waiver. This waiver is applicable under the Freedom of Information Act of 1986. It specifies, "[a] fee waiver or reduction can only be granted if the information furnished to the requester is likely to contribute significantly to the public understanding of the operations or activities of the government and not primarily in the commercial interest of the requester." As this request is in relation to issues of public importance that will significantly assist the public in understanding the City of Baltimore Gun Trafficking Intelligence program, and ATF's contribution to the program, a fee waiver is appropriate. Any response to this request will be provided to the public and is for the benefit of the public.

While I believe that my purposes fall directly within the standard for a "Fee Waiver," if you find that my purposes do not, I will agree to pay the appropriate fees up to \$500.00. If you estimate that the cost will exceed \$500.00, please advise me of the estimated costs exceeding \$500.00, and I will make a decision on whether to proceed. Nonetheless, even with my agreement to pay, I retain the right to appeal any decision based on the fee waiver; and if successful, the return of any money, which was inappropriately paid in relation to this FOIA.

Subject Matter of Request: This is a request for all documents, communications (written or electronic including emails and text messages), and memorandum relating to the City of

Baltimore's Gun Trafficking Intelligence Platform and the use of the Bureau of Alcohol, Tobacco, and Firearms' e-Trace system in the creation and implementation of that program. This includes any data sent to the City of Baltimore from the ATF e-Trace system for the purposes of implementing the Gun Trafficking Intelligence Platform. This data may include but is not limited to any firearm traces and ballistic evidence being sent from or received by the ATF.

Additionally, this request seeks any communications (written or electronic including emails and text messages) relating to the creation, implementation, and use of the program. Including, but not limited to, communications to and from any individuals associated with Everytown for Gun Safety, to and from any individuals associated with ATF or the United States Department of Justice, and to and from any individuals associated with the Baltimore Police Department and City of Baltimore.

Temporal Scope of Request: Please limit your search for responsive documents to the period of January 1, 2019 to the present.

Request for "Vaughn Index": In the event all or any part of an otherwise responsive document is withheld subject to a claim that one or more FOIA exemptions apply, please provide an index identifying the document or part thereof, by author(s), addressee(s), date, subject matter, and the specific exemption asserted as a basis for failing to produce the complete document. If a document is withheld only in part, please mark the redacted document to indicate the deletion.

Waiver of Inspection: If search and copying costs are not estimated to exceed \$500.00, please send a copy of the documents to me at the address referenced below.

Request for Timely Action: As mandated by FOIA, 5 U.S.C. § 552(a)(6)(A)(i), I request your reply within twenty business days. The requested documents relate to a matter of current public concern so that time is of the essence. In the event you have any questions concerning this request, please contact me as soon as possible. I would be pleased to clarify any perceived ambiguity informally or to discuss ways to narrow my request so as to ensure a timely response.

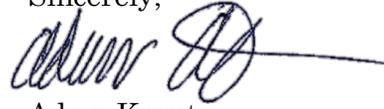
Contact Information: Please direct all communications to me at:

Adam Kraut
Senior Director of Legal Operations
1215 K Street 17th Floor,
Sacramento CA, 95814
916-476-2342
akraut@fpclaw.org

Certification: I certify everything in this request is true and correct to the best of my knowledge and belief.

Thank you in advance for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adam Kraut', with a long horizontal line extending to the right.

Adam Kraut
Senior Director of Legal Operations