



March 18, 2021

Dana Abdul Saboor
Baltimore Police Department
c/o Office of Legal Affairs
242 W. 29th Street
Baltimore, MD 21211

Dear Ms. Saboor,

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.

Please consider this a formal request for access to and copies of public records and information pertaining to matters of great public concern. The records and information requested are important to the public, our members, and people and taxpayers throughout Maryland and the United States.

As part of our programs, we regularly request important government records, make them available to the public, perform analysis, and report on important news and issues, such as programs instituted by federal and state law enforcement agencies. This request is related to news gathering purposes. This information is not being sought for commercial purposes.

Under all applicable law, including but not limited to the Maryland Public Information Act, I am requesting copies of all public records and information that relate to the Gun Trafficking Intelligence Platform¹ being introduced in conjunction with Everytown for Gun Safety (“Everytown”) in the City of Baltimore. Responsive records may include but are not limited to:

- Data, documents (electronic or otherwise), and memorandums from the Bureau of Alcohol, Tobacco and Firearms’ (“ATF”) relating to its’ e-Trace system;
- Data, documents (electronic or otherwise), and memorandums sent to the Bureau of Alcohol, Tobacco and Firearms;
- Documents, communications (written or electronic including emails and text messages), and memorandum relating to the implementation of the program;
- Communications (written or electronic including emails and text messages) relating to the program, including but not limited to, those which are to and from any individuals associated with Everytown, to and from any individuals associated with ATF or the United States Department of Justice, and between members of the Baltimore Police Department;

¹ As referenced in the article found at: <https://www.baltimoresun.com/news/crime/bs-md-ci-cr-everytown-guns-baltimore-20210303-33sfk3sd5zhtdjtnhk37v5eky-story.html>.

- Documents, communications (written or electronic including emails and text messages), and memorandums relating to the technologies used in the program;
- Firearm traces and ballistic evidence;
- Reports;
- Statements; and
- Budgets documents.

If there are any fees for the responsive records, please inform me if the cost will exceed \$500. However, I request a waiver of all fees because the disclosure of the requested information is in the public interest and will contribute significantly to the public's understanding of the program being instituted by the City of Baltimore along with resources utilized to do so.

Note that when a public official or employee uses a personal account to communicate about the conduct of public business, the records may be subject to disclosure.

This request potentially requires the production of records that exist or are maintained in electronic form, including but not limited to e-mails and chat/mobile phone messages. Records, including e-mails and other electronic records, are often subject to "retention" or "destruction" policies that require their automatic deletion at some point in time. If any records that are potentially responsive to this request are subject to such a retention or destruction policy, please prevent their deletion/destruction before you can locate, review and provide me with copies. For all records, please take all steps necessary to prevent the intentional or accidental destruction/loss of these records during the pendency of this request. I request you confirm that you have placed a "litigation hold" on all responsive records and information.

Please provide all records and information responsive to this request via e-mail attachment(s); if the files are too large to e-mail, please let us know and we will make arrangements for an alternative means of transmitting the responsive records and information.

The Maryland Public Information Act requires a response to this request within 30 days. If access to the records I am requesting will take longer than this amount of time, please contact me with information about when I might expect copies of the requested records. If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the records/information and notify me of the appeal procedures available to me under law.

Please contact me at akraut@fpclaw.org or (916) 476-2342 if you have any questions. Thank you for your time, assistance with, and fulfillment of this request.

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