



March 23, 2020

Mary Davison
Montgomery County Police Records Division
100 Edison Park Drive
Gaithersburg, MD 20878

Dear Ms. Davison,

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 and 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 by investigating interactions with law enforcement relating to arms. 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 police shooting of Duncan Socrates Lemp that took place on or about Thursday, March 12, 2020, in the 12200 block of St. James Road in Potomac, MD. Responsive records may include but are not limited to:

- Warrants;
- Body camera or other video footage;
- Audio recordings, including 911/emergency calls;
- Reports;
- Statements;
- Investigations;
- Prior disciplinary proceedings for or investigations into any officer involved / present.

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 in that the disclosure of the requested information is in the public interest and will contribute significantly to the public's understanding of the death of Duncan Socrates Lemp.

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 that 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 policy@fpchq.org or (916) 378-4308 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 "M. Larosiere". The signature is written in a cursive, flowing style.

Matthew Larosiere
Director of Legal Policy