



March 4, 2022

Justin Wagner
Everytown for Gun Safety



SUBMITTED VIA ONLINE PORTAL

FOIA Officer
Bureau of Alcohol, Tobacco, Firearms and Explosives
Washington, DC 20226
Email: FOIAmail@atf.gov

Dear FOIA Officer,

On behalf of Everytown for Gun Safety Support Fund, I write pursuant to the Freedom of Information Act, 5 U.S.C. § 552, et seq., to request documents in possession of the ATF. Note, as indicated below, this is **an expedited request pursuant to 6 C.F.R. 5.5(d)(1)**, and as such we would appreciate your immediate attention to this request.

Public reporting indicates that the ATF sent any number of employees to the National Sports Shooting Foundation (NSSF) 2022 SHOT Show in Las Vegas. This was recently the topic of a lengthy article in the *New York Times* today (March 4, 2022).¹ The NSSF is the gun industry's trade association, which lobbies on numerous issues relating to the ATF. In connection with the ATF's participation in the SHOT Show and its relationship with the NSSF, we seek the following records:

- 1) Any approval letters from agency ethics officials related to the SHOT Show, including justification for the participation of agency personnel in the SHOT Show.
- 2) Records sufficient to show:
 - a) the total number of ATF employees who attended the SHOT Show in each of 2019, 2020, and 2022; and

¹ Glenn Thrush, "ATF, Agency Crucial to Biden's Gun Plan, Struggles to push for Reform", NY Times, March 4, 2022, <https://www.nytimes.com/2022/03/04/us/politics/atf-biden-gun-reform.html>.



- b) the job title of each ATF employee in a leadership position at ATF who attended the SHOT Show in each of 2019, 2020, and 2022.
- 3) Records sufficient to show the total cost to ATF to participate in the SHOT Show in 2019, 2020, and 2022.
- 4) All presentations or other published materials generated by the ATF for the 2019, 2020, and 2022 SHOT Show.
- 5) Documents that show any privately funded events, put on by companies, organizations, or individuals connected to the firearms industry, attended by ATF employees during the 2019, 2020, and 2022 SHOT Show. This includes, but is not limited to, meals, afterparties, receptions, and trips to gun ranges.
- 6) Any email or other communications concerning the NSSF from January 1, 2020 to present. In the interest of efficiency, our request seeks documents from the following document custodians: Acting Director Marvin Richardson, Public Affairs Chief April Langwell, Firearms Industry Programs Branch Chief Andrew Perdas, Industry Processing Branch Chief Amy Stely, Chief of Staff Daniel Board, Firearms and Ammunition Technology Division Chief Earl Griffith, NFA Division Chief Steven Rosenthal, Acting Deputy Director Tom Chittum, and Joseph Allen.
- 7) Any email communication - sent to, received from or forwarded - containing an employee from the NSSF from January 1, 2020 to the present. In the interest of efficiency, we would accept an email search for the term "@nssf.org".
- 8) All records concerning Acting Director Richardson's taped appearance with the NSSF's Larry Keane at the 2022 SHOT Show. This includes, but is not limited to, records concerning (i) preparation for the interviews, (ii) logistics related to the interviews, and (iii) any feedback or reaction received by Acting Director Richardson to the interview. This would include, but not be limited to, feedback or reactions from other federal government agencies.
- 9) All records concerning the March 4, 2022 article written by Glen Thrush entitled "*ATF, Agency Crucial to Biden's Gun Plan, Struggles to push for Reform.*" This would include, but not be limited to, interagency communications, discussions on how to respond to the article, and/or responses to the article after publication.

This request qualifies for a fee waiver because disclosure of the requested documents is in the public interest as the documents are likely to contribute significantly to the public's



understanding of the activities of the federal government with respect to gun policies. This request is not made for a commercial purpose. If the request for a fee waiver is not granted, Everytown is willing to pay the cost of processing this request. Please contact me at the number below if you anticipate that the cost of processing this request will exceed \$500. I would be grateful if you would deliver the materials in electronic format.

FOIA regulations provide that if some parts of records containing the requested information are exempt from mandatory disclosure, then non-exempt materials shall be disclosed after the exempt material has been deleted. See 5 U.S.C. § 552(b); 28 C.F.R. § 16.6. Therefore, if you determine some portion of a record that is responsive to this request is exempt, please provide a copy of all reasonably segregable, non-exempt portions of the record.

This is an expedited request pursuant to 6 C.F.R. 5.5(d)(1). We request that you produce these documents in an expedited fashion because there is an urgency to inform the public concerning Federal Government activity. In particular, as noted above, it has been publicly reported recently that 65 ATF employees attended the NSSF's SHOT Show in Las Vegas. Substantial questions, relevant to the public's understanding of the ATF, have been raised about the relationship between the ATF and the very gun industry it regulates. This request seeks information about the ATF's relationship with the gun industry's trade association and it is critical to the public's understanding of the ATF. Thus, this request qualifies for expedited treatment.²

Thank you for prompt attention to this request. Please feel free to contact me at [REDACTED] if you have questions or require additional information.

Sincerely,

/s/ Justin Wagner

Justin Wagner
Senior Director of Investigations
Everytown for Gun Safety Support Fund

² Pursuant to 6 C.F.R. 5.5(d)(1) governing expedited requests, Everytown for Gun Safety Support Fund is an organization "engaged in disseminating information." The organization is the largest gun safety organization in the county and regularly publishes research on the topic of gun safety. Additional information can be found at www.everytownresearch.org.