

Exhibit 1

Bureau of Alcohol, Tobacco, Firearms and Explosives
Information Privacy and Governance (IPG) Division, Room 4E.301
99 New York Avenue, NE
Washington, DC 20226
[Email: foiamail@atf.gov](mailto:foiamail@atf.gov)

Dear sirs/madames:

This is a request under the Freedom of Information Act ("FOIA"), 5 U.S.C. ' 552. I request records based on a database query containing data on **firearms** recovered in **Mexico, Guatemala, Honduras, and El Salvador**, and **traced by the ATF, since Dec. 31, 2014**. From this, I request database query results with the following data:

1. **Number of firearms traced**, and with the following disaggregations, **for each country** where firearm was recovered and **each year**:

- **state of FFL where firearm was purchased**
- **county of FFL where firearm was purchased**
- **zip code of FFL where firearm was purchased**
- **type of firearm (rifle, shotgun, pistol, revolver, other)**
- **caliber of firearm**
- **make of firearm**

2. **Number of buyers** to which recovered firearms were traced as purchases, **by year**, **by country where firearm was recovered**, and by **county of purchase**

3. **Number of FFLs** to which recovered firearms were traced as purchases, with the following disaggregations for **each country** and **year of purchase**:

- **county and state of purchase**
- **type of firearm (rifle, shotgun, pistol, revolver, other)**
- **caliber of firearm**

As the Ninth Circuit Court ruled last year in *The Center for Investigative Reporting vs. U.S. Department of Justice* ([3:17-cv-06557-JSC](#)), aggregate gun trace data, such as the number of guns traced back to a general location, falls outside the Tiahrt Amendment's scope. The Court also rejected the federal government's argument that the querying and searching of government databases amounts to the creation of a "new document."

I make this request as a representative of the news media. I have published extensively on issues related to firearms trafficking in the Americas, including widely cited [research reports](#), op-eds in publications such as the [Los Angeles Times](#), a [documentary film](#), and a [web site](#) dedicated to the issue.

If this request is denied in full, or in part, please cite each exemption pursuant to 5 U.S.C. ' 552(b) that justifies each denial. If an exemption applies, however, please

consider exercising the agency's discretionary release powers to disclose the records. Any such action supports the presumption of "openness" on which FOIA is based.

Additionally, please release all reasonably segregable portions of the records that do not meet an exemption. 5 U.S.C. ' 552(b). For example, if you determine that FFL zip code data is not releasable but FFL county data is, please adjust the database query to release all data that is releasable.

I request a waiver of all costs associated with fulfilling this submission pursuant to 5 U.S.C. ' 552(a)(4)(A)(iii) and 6 C.F.R. §5.11(k). Disclosure of the requested records will contribute significantly to public's understanding of the operations or activities of the government. However, if my request for a waiver is denied, I am willing to pay fees for this request up to a maximum of \$50. If you estimate that the fees will exceed this limit, please inform me first.

I request that the information be provided in electronic format that is searchable by commonly used software programs, and I ask to receive it via email.

I also include a telephone number at which I can be contacted during the hours of 8:30 to 5:30 Pacific Time, if necessary, to discuss any aspect of my request. Thank you for your consideration of this request.

Sincerely,

John Lindsay-Poland

Coordinator, Stop US Arms to Mexico Project
Global Exchange
1446 Market St.
San Francisco, CA 94103
Telephone: 510-282-8983
Cc: Alain Stephens, Champ Barton, The Trace