

Exhibit A

WILLIAM J. OLSON, P.C.

ATTORNEYS AT LAW

370 MAPLE AVENUE WEST, SUITE 4

VIENNA, VIRGINIA 22180-5615

TELEPHONE (703) 356-5070

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114 CREEKSIDE LANE
WINCHESTER, VA 22602-2429
TELEPHONE (540) 450-8777
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WILLIAM J. OLSON
(VA, D.C.)

HERBERT W. TITUS
(VA OF COUNSEL)

JEREMIAH L. MORGAN
(D.C., CA ONLY)

ROBERT J. OLSON
(VA, D.C.)

March 18, 2022

via DHS Portal

Privacy Office, Mail Stop 0655
Department of Homeland Security
2707 Martin Luther King Jr. AVE SE
Washington, DC 20528-065
Phone: 202-343-1743 or 866-431-0486 | Fax: 202-343-4011

Re: FREEDOM OF INFORMATION ACT (FOIA) REQUEST
of Gun Owners of America and Gun Owners Foundation regarding
December 2020 Report titled “Diverse DVE Landscape Probably Will Persist.”

Dear Sirs:

We represent Gun Owners of America (“GOA”) and Gun Owners Foundation (“GOF”), and submit this Freedom of Information Act (“FOIA”) request on their behalf to the Department of Homeland Security (“DHS”).

GOA is a nonprofit social welfare organization exempt from federal income tax under section 501(c)(4) of the Internal Revenue Code. GOA’s tax-exempt mission and purposes include educating the public and conducting activities in defense of the Second Amendment and the right to keep and bear arms. GOA’s principal office is located at 8001 Forbes Place, Suite 202, Springfield, Virginia 22151. (For further information on GOA, please see <https://gunowners.org>.) GOF is a Virginia non-stock corporation, organized and operated as a non-profit legal defense and educational foundation that is exempt from federal income taxes under Section 501(c)(3) of the Internal Revenue Code. GOF is supported by gun owners across the country. (For further information on GOF, please see <https://www.gunowners.com/>.)

Record Request

We seek the following records:

- (a) The Intelligence in Depth report titled “Diverse DVE Landscape Probably Will Persist” dated December 30, 2020.¹

If any of the information sought above is publicly available, please provide us with the location(s) of that information.

Please email the documents to wjo@mindspring.com, or mail them to the following address:

Robert J. Olson, Esquire
William J. Olson, P.C.
370 Maple Ave W., Suite 4
Vienna, VA 22180-5615

Fee Waiver Request

We request that the search, review, and copying fees be waived as provided under section 5 U.S.C. § 552(a)(4)(A) and 28 CFR 16.10(k). GOA and GOF are nonprofit organizations seeking the requested documents to educate the public on a matter of great public importance, by releasing information that — in addition to contributing to public understanding on the workings of government — may have great effect on substantive policy discussions relating to the exercise of citizens’ rights under the Second Amendment. GOA and GOF routinely publish the results of findings from documents they receive through FOIA requests, free-of-charge on their websites, in releases to members and supporters, and through dissemination of information to the news media.

The fees should be waived because release of the requested documents is in the public interest, and the requested information is likely to contribute significantly to public understanding of the operations or activities of the government. Additionally, the records sought by GOA and GOF are likely to contribute significantly to public understanding of the operations or activities of the government.

The release of the requested documents is not primarily for any commercial interest or purpose, including any commercial interest of GOA or GOF. GOA and GOF intend to disseminate to the general public, free of charge, any important information it obtains as a result of this request.

¹ This report was noted in the Senate Staff Report (footnote 175): <https://www.rules.senate.gov/download/hsgac-rules-jan-6-report> with additional reporting at Newsweek: <https://www.newsweek.com/exclusive-secret-threat-report-named-everyone-except-angry-donald-trump-voters-1661317>.

If our clients' waiver request is denied, we would appreciate an estimate of the costs involved in procuring any of the requested documents if such costs exceed \$250. If the costs do not exceed \$250, however, we do not need an estimate, and we will guarantee payment.

We request that the 20-day response time imposed by 5 U.S.C. § 552(a)(6)(A)(i) and 28 CFR 16.6(b) be adhered to strictly. We look forward to hearing from you within 20 business days.

Thank you for your prompt attention to this request.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Rob Olson".

Robert J. Olson

RJO:ls

cc: Gun Owners of America
Gun Owners Foundation

Exhibit B



Homeland
Security

April 13, 2022

SENT VIA E-MAIL TO: wjo@mindspring.com

Stephen Stamboulieh
P.O. Box 428
Olive Branch, MS 38654

Re: Freedom of Information Act Request 2022-IAFO-00095

Dear Requestor Stamboulieh

This is a final response to your Freedom of Information Act (FOIA) request to the Department of Homeland Security (DHS) Intelligence and Analysis (I&A), dated March 18, 2022 and received in this office on March 18, 2022. You were asking,

“The Intelligence in Depth report titled “Diverse DVE Landscape Probably Will Persist” dated December 30, 2020.”

After a careful review of your FOIA request, we determined that the information you are seeking is not under the purview of DHS I&A. Requests for the subject report should be made to the Federal Bureau of Investigation (FBI). In our effort to assist you on this matter, we are providing you with the following contact information:

FBI Records Information Dissemination Section
Attn: FOIPA request
170 Marcel Drive
Winchester, VA 22602-4843
Facsimile: (540) 868-4391/4997

Please be advised that this action is not a denial of your request and will not preclude you from filing other requests in the future.

Your request has been assigned reference number **2022-IAFO-00095**. Please refer to this FOIA request number in any future correspondence with this office. If you have any questions, or would like to discuss this matter, please feel free to contact this office at I&AFOIA@HQ.DHS.GOV.

Sincerely,
Meekia W.
Meekia W.
Assistant FOIA Officer

Exhibit C

WILLIAM J. OLSON, P.C.

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ROBERT J. OLSON
(VA, D.C.)

JEREMIAH L. MORGAN
(D.C., CA ONLY)

HERBERT W. TITUS
(1937-2021)

May 13, 2022
via FBI Portal

FBI Records Information Dissemination Section
ATTN: FOIPA REQUEST
170 Marcel Drive
Winchester, VA 22602-4843

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of Gun Owners of America and Gun Owners Foundation regarding
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Record Request

We seek the following records:

- (a) The Intelligence in Depth report titled “Diverse DVE Landscape Probably Will Persist” dated December 30, 2020.¹

We initially requested this report from the Department of Homeland Security (“DHS”), however, DHS responded “the information [we] are seeking is not under the purview of DHS I&A. Requests for the subject report should be made to the Federal Bureau of Investigation.” As such, we now seek the above-named report from the FBI.

If any of the information sought above is publicly available, please provide us with the location(s) of that information.

Please email the documents to wjo@mindspring.com, or mail them to the following address:

Robert J. Olson, Esquire
William J. Olson, P.C.
370 Maple Ave W., Suite 4
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Sincerely yours,

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Robert J. Olson

RJO:ls

cc: Gun Owners of America
Gun Owners Foundation

Exhibit D



U.S. Department of Justice

Federal Bureau of Investigation
Washington, D.C. 20535

May 19, 2022

MR. ROBERT J. OLSON
WILLIAM J. OLSON, P.C.
SUITE 4
370 MAPLE AVENUE WEST
VIENNA, VA 22180-5615

FOIPA Request No.: 1546052-000
Subject: Diverse DVE Landscape Probably
Will Persist Intelligence Report

Dear Mr. Olson:

This acknowledges receipt of your Freedom of Information/Privacy Acts (FOIPA) request to the FBI. Below you will find check boxes and informational paragraphs about your request, as well as specific determinations required by these statutes. Please read each one carefully.

- Your request has been received at FBI Headquarters for processing.
- You submitted your request via the FBI's eFOIPA system.
- We have reviewed your request and determined it is consistent with the FBI eFOIPA terms of service. Future correspondence about your FOIPA request will be provided in an email link unless the record's file type is not supported by the eFOIPA system.
- We have reviewed your request and determined it is not consistent with the FBI eFOIPA terms of service. Future correspondence about your FOIPA request will be sent through standard mail.
- The subject of your request is currently being processed and documents subject to the FOIPA will be released to you upon completion.
- Release of responsive records subject to the FOIPA will be posted to the FBI's electronic FOIA Library (The Vault), <http://vault.fbi.gov>, and you will be contacted when the release is posted.
- Your request for a public interest fee waiver is under consideration and you will be advised of the decision if fees are applicable. If your fee waiver is not granted, you will be responsible for applicable fees per your designated requester fee category below.
- For the purpose of assessing any fees, we have determined:
 - As a commercial use requester, you will be charged applicable search, review, and duplication fees in accordance with 5 USC § 552 (a)(4)(A)(ii)(I).
 - As an educational institution, noncommercial scientific institution or representative of the news media requester, you will be charged applicable duplication fees in accordance with 5 USC § 552 (a)(4)(A)(ii)(II).
 - As a general (all others) requester, you will be charged applicable search and duplication fees in accordance with 5 USC § 552 (a)(4)(A)(ii)(III).

Please check the status of your FOIPA request at www.fbi.gov/foia by clicking on **FOIPA Status** and entering your FOIPA Request Number. Status updates are adjusted weekly. The status of newly assigned requests may not be available until the next weekly update. If the FOIPA has been closed the notice will indicate that appropriate correspondence has been mailed to the address on file.

For questions regarding our determinations, visit the www.fbi.gov/foia website under "Contact Us." The FOIPA Request number listed above has been assigned to your request. Please use this number in all correspondence concerning your request.

If you are not satisfied with the Federal Bureau of Investigation's determination in response to this request, you may administratively appeal by writing to the Director, Office of Information Policy (OIP), United States Department of Justice, 441 G Street, NW, 6th Floor, Washington, D.C. 20530, or you may submit an appeal through OIP's FOIA STAR portal by creating an account following the instructions on OIP's website: <https://www.justice.gov/oip/submit-and-track-request-or-appeal>. Your appeal must be postmarked or electronically transmitted within ninety (90) days of the date of my response to your request. If you submit your appeal by mail, both the letter and the envelope should be clearly marked "Freedom of Information Act Appeal." Please cite the FOIPA Request Number assigned to your request so it may be easily identified.

You may seek dispute resolution services by contacting the Office of Government Information Services (OGIS). The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, e-mail at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769. Alternatively, you may contact the FBI's FOIA Public Liaison by emailing foipaquestions@fbi.gov. If you submit your dispute resolution correspondence by email, the subject heading should clearly state "Dispute Resolution Services." Please also cite the FOIPA Request Number assigned to your request so it may be easily identified.

Sincerely,



Michael G. Seidel
Section Chief
Record/Information
Dissemination Section
Information Management Division