

EXHIBIT 6

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MICHAEL JOHN SARNO,
Plaintiff,

v.

**UNITED STATES DEPARTMENT
OF JUSTICE, BUREAU OF ALCOHOL,
TOBACCO, FIREARMS AND
EXPLOSIVES, *ET AL.*,**
Defendants.

Case No. 1:16-cv-00677

Judge Rosemary M. Collyer

STIPULATION OF VOLUNTARY DISMISSAL

Plaintiff Michael John Sarno (“Plaintiff”) and Defendant, Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), by and through the undersigned counsel, hereby stipulate to dismissal of the above-captioned action without prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1), with each party to bear its own costs.

1. This matter was initiated by Plaintiff, *pro se*, on April 8, 2016, to seek production of certain documents pursuant to the Freedom of Information Act. (Dkt. No. 1).

2. ATF made eleven (11) document productions from July 2018 thru November 2019 totaling approximately 1,073 pages as follows:

#	Date	Pages	Description
001	July 1, 2018	56	USDOJ Report of Investigation #1-19
002	August 2, 2018	35	USDOJ Report of Investigation #21-34
003	September 4, 2018	105	USDOJ Report of Investigation #35
004	October 1, 2018	67	USDOJ Report of Investigation #59
005	November 1, 2018	78	USDOJ Report of Investigation #101
006	December 3, 2018	40	USDOJ Report of Investigation #176
007	March 1, 2019	47	USDOJ Report of Investigation #201; 203-207; 210-211; 217; 220; 223-224; 228; 230; 244; -246; 249
008	April 1, 2019	39	USDOJ Report of Investigation #250-258; 260-265; 267-268
009	June 3, 2019	71	USDOJ Report of Investigation #269-291
010	August 6, 2019	92	USDOJ Report of Investigation #301-324

011.1	November 5, 2019 Pt. 1 of 6	34	USDOJ Report of Investigation #35-36; 42-49; 57-58; 62
011.2	November 5, 2019 Pt. 2 of 6	65	USDOJ Report of Investigation #70-80; 82; 84; 87-94; 96-97; 105; 107; 109-110; 115; 119
011.2	November 5, 2019 Pt. 3 of 6	33	USDOJ Report of Investigation #154; 170; 202; 208-209; 212-216; 218-219; 221-222; 225-227
011.3	November 5, 2019 Pt. 4 of 6	32	UDSOJ Report of Investigation #229; 231-243; 247-248; 259; 266
011.4	November 5, 2019 Pt. 5 of 6	197	UDSOJ Report of Investigation #318; 339-343; 346-373
011.5	November 5, 2019 Pt. 6 of 6	82	USDOJ Report of Investigation #374-390
	TOTAL	1073	

3. In its final production on November 5, 2019, ATF indicated that its production was complete.

4. Plaintiff questioned the completeness of the production because Plaintiff did not receive any documents relating to a LaGrange Park aggravated armed robbery, which Plaintiff believed should be in the possession or control of the ATF. Plaintiff supplied documentation to assist the ATF's search: a Property/Evidence Report from the LaGrange Park Police Department, Case Report Number 03-5165, relating to an incident described as an aggravated armed robbery on or about 8/25/2003, around 359 N. LaGrange Road, LaGrange Park, IL. According to this Property/Evidence Report, certain items such as an "audio cassette" and "photo card" were turned over and signed for by ATF Agent Tina Sherrow on or about 9/16/2010.

5. ATF conducted an additional review and determined that the materials related to the LaGrange Park incident described in paragraph 4 were turned over to FBI Agent Courtney Trautman on September 16, 2010.

6. Based on the document productions and representations made by ATF, Plaintiff's claim against ATF is dismissed without prejudice.

7. This matter should be closed and removed from the docket.

Dated: February 18, 2020

Respectfully submitted,

/s/ Nicholas A. Caputo
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