

EXHIBIT 20

Seth Watkins

From: Seth Watkins <Watkins@adduci.com>
Sent: Friday, November 20, 2015 3:53 PM
To: foiamail@atf.gov
Subject: FOIA Appeal

This will appeal the denial of information requested under FOIA.

Pending before the ATF is a request dated and emailed to the ATF on October 21, 2015. A copy of the request is forwarded below ("FOIA Request"). Receipt of the FOIA Request has not been acknowledged by the ATF.

Pursuant to 5 U.S.C. § 552(a)(6)(A)(i), a response to the FOIA Request was due within 20 business days. Requester deems the ATF's failure to provide a response determination within the statutory time limits as a denial of the FOIA Request. Requester hereby appeals the denial of the FOIA Request. See, e.g., 5 U.S.C. § 552(a)(6)(C).

Please respond to this appeal within 20 business days in accordance with 5 U.S.C. § 552(a)(6)(A)(ii).

Thank you.

Sincerely,
/s/
Seth A. Watkins

Seth A. Watkins, Ph.D.
ADDUCI, MASTRIANI & SCHAUMBERG LLP
1133 Connecticut Avenue, NW
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From: Seth Watkins
Sent: Wednesday, October 21, 2015 3:07 PM
To: 'foiamail@atf.gov' <foiamail@atf.gov>
Subject: FOIA Request

This is a request under the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552.

On behalf of our requester client, we hereby request copies of the following records under FOIA, preferably provided to the requester's undersigned attorney in electronic format (pdf):

1. each Memorandum of Understanding or other agreement entered into between the United States Department of Veterans Affairs ("VA") and the United States Department of Justice ("DOJ"), Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"), concerning or relating to submission by the VA to the DOJ/ATF of information on persons to be prohibited from purchasing a firearm (including all amendments, supplements, exhibits, and addenda thereto);
2. all records (including all amendments, supplements, exhibits, and addenda thereto) which set out or reflect the providing of information (such as names of individuals) by the VA to the DOJ/ATF, for example for inclusion in the National Instant Criminal Background Check System ("NICS"), including but not limited to the NICS Index Mental Defective Commitment File, including but not limited to any directive, guidance, policy, instruction, manual, procedure, guideline, standard, internal advice, message, checklist, flow chart, and/or memorandum with respect thereto;
3. to the extent the ATF itself has custody or control of such records, all communications made by or on behalf of the United States Attorney General ("OAG") to the VA requesting or requiring that the VA submit to the DOJ/ATF information on persons to be prohibited from purchasing a firearm, and all communications from the VA in response thereto (on information and belief, OAG made such a request to the VA in 1998) (this request does not seek the subsequent communications that actually provide information concerning particular individuals).

NONE OF THE AFOREMENTIONED REQUESTS SEEK DISCLOSURE OF THE NAMES OF INDIVIDUALS PROVIDED BY THE VA TO THE ATF, NOR DO THEY SEEK ANY INFORMATION PROTECTED UNDER THE PRIVACY ACT.

We hereby consent to pay all costs incurred for search, duplication and review of materials up to \$250.00. If additional costs will be required, please contact me for my approval.

If any records are withheld from release, please identify the withheld records by producing and providing to me an index pursuant to *Vaughn v. Rosen*, 484 F.2d 820, 826-28 (D.C. Cir. 1973).

If the ATF does not have custody or control over certain requested and responsive records but knows or believes that another component of DOJ subject to FOIA does, please forward this FOIA Request to the appropriate person and inform us that you have done so.

Please respond within 20 business days in accordance with 5 U.S.C. § 552(a)(6)(A).

If you have any questions about this request, please contact me immediately by the means listed below.

Thank you for your assistance with this matter.

Sincerely,

/s/

Seth A. Watkins

Seth A. Watkins, Ph.D.
ADDUCI, MASTRIANI & SCHAUMBERG LLP
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Washington, DC 20036
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