

Federal Firearms Regulations

Options for a New Administration to Reduce or Modify Firearms Regulations



White Paper (Not for public distribution)

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6 Jan 2017

"A well regulated Militia, being necessary to the security of a free State, the right of the people to keep and bear Arms, shall not be infringed."

Second Amendment to the United States Constitution

Executive Summary:

This paper serves to provide the new administration multiple options regarding firearms regulations specific to ATF. These general thoughts provide potential ways to reduce regulations or suggest legislation that promote commerce and defend the second amendment, without significant impact towards ATF's mission of fighting violent firearms crimes or regulating the firearms industry. Two areas of focus are proffered in this paper: 1) regulatory changes via elimination or modification; and 2) proposed legislation for Congressional action. In addition, a few key areas for further discussion are identified. Positive steps to further reduce gun violence through enforcement or regulation are also very important but are not the focus of this paper.

Proposed regulatory changes for consideration via elimination or modification:

1. **New FFLs Dealing Exclusively at Gun Shows (or Internet):** For over two years representatives within the firearms licensing community have asked for clarification and/or a decision from ATF regarding a new federal firearms licensee applicant requesting to conduct business solely at gun shows. ATF has delayed a decision or guidance due to several concerns including what it means to be engaged in the business of selling firearms, and ATF's ability to have access to a dealer's records where they may not have routine business hours. ATF has already recognized FFL activities via the internet without a classic "storefront" and is considering whether to include gun show only activities in a similar manner. Times have changes since ATF provided guidance many years ago to FFLs regarding these issues. Classic "brick and mortar" storefronts with an on-hand inventory and set business hours through the front door often no longer apply in today's modern marketplace. A question remains as to whether ATF should consider simply changing past policy, or initiate a lengthy regulation rule change process. There is ample room for immediate action on this issue. ATF can simply immediately issue new guidance and adjust past policy to allow for a business to obtain an FFL with no intention of selling firearms out the business front door (whether at guns shows, over the internet, or elsewhere). This practice has in fact already been taking place without formal guidance. Provided the business is established at a location in full compliance with state and local laws and ordinances, ATF has the formal business

location with which to inspect the licensee. By virtue of buying firearms at that business location, maintaining records and doing general business there a "location" which is "engaged in the business" is also established. If a formal regulation rule change is needed for long-term clarification, ATF can start that process while immediately issuing a policy change to the above effect which would have no negative impact to public safety. In fact, it would encourage more sales and business through a licensee, including background checks on sales at gun show events and likely increase public safety. Minor modifications to ATF application forms and questions asked by ATF investigators during new applicant inspections are easily amended.

2. **Armor Piercing Ammunition:** ATF has regulatory authority to classify what is and is not armor piercing (AP) ammunition. Several major ammunition manufacturing companies have had requests pending for years to produce AP ammunition which is not intended for use in a handgun and potentially lawful under Federal law. Several years ago ATF, in an effort to approve some of these requests, also proposed to withdraw the 5.56 "green tip" AP ammo exemption. This created controversy that ultimately staled any AP ammo classification decisions. ATF has been under orders since that time to hold off on any AP ammo determinations. ATF can easily re-examine the issue and approve many of the pending requests based on prior established criteria, while leaving the 5.56 "green tip" ammunition exemption intact. Many of the calibers being considered for approval are used in hunting or sporting firearms and arguably have a valid sporting purpose. While threats to the public and law enforcement in particular are a serious consideration, many calibers being considered will generally also penetrate body armor regardless of bullet type (AP or not). If decisional restrictions from the Department of Justice were removed, ATF could readily apply drafted standards for reviewing AP ammo request while leaving the 5.56 "green tip" exemption intact. Many of the Industry's pending requests could be decided in a timely manner, meeting statutory requirements and safety concerns within the law.

3. **Re-importation of Certain Department of Defense Surplus Firearms from Foreign Countries:** The State Department and ATF have worked over the past several years with the Administration on requests for the importation of U.S.-origin C&R military firearms, ammunition and parts that were once sent overseas to support allies. There are surplus rifles, pistols, ammunition and other importable U.S. origin C&R defense articles (including M1 Garand and Carbine rifles) and pistols (M1911s) overseas awaiting importation authority. There is no public safety reason why taxpayer funded US-origin C&R defense articles should be denied re-importation to the American public, while non-US origin C&R items are approved. Additionally, these items do not represent any discernable public safety concern, as demand lies with collectors of vintage military firearms. Importation and sale through the Civilian Marksmanship Program would effectively regulate the lawful transfer of these firearms through a licensee and a

background check. Joint effort from the administration, Department of State and ATF could easily reverse past decisions and allow for the safe and legal importation and sale of these historical and collectible items. M1 Garand rifles have been approved for importation in the recent past, setting precedence for this to occur. The more recent denials were in part due to due to perceived potential to be used in crimes, for which there is little if any evidence for such a concern.

Commented (b) (6): Is there a reason CMP needs to be mentioned here? Wouldn't all imports effectively be regulated through licensee NICS checks?

4. **18 U.S.C. 922(o):** Current law precludes Federal Firearms Licensees who are registered Special Occupational Taxpayers (FFL/SOTs) from transferring machineguns manufactured post 1986 unless they are for export or for law enforcement/government use; and there is no provision for the transfer from one FFL/SOT to another. This is detrimental to FFL/SOTs operating within the small but useful DoD supported industry and theatrical armorer community. A change in the statute to allow for limited approval for FFL/SOTs to transfer between each other within this community would have no impact on violent crime. Domestic co-production by FFL/SOT is also problematic and could be resolved with a change to the statute. Another option to legislative change if supported by the Department of Justice would be to re-institute ATF's ability to provide "variances" to licensees, as ATF has done in the past that would adequately provide for transfers within defense industry FFLs and avoid a requirement to change the statute. Use of variances in a consistent and fair process within the limited DoD supported FFL/SOT community would be viewed favorably by the industry and have no impact on public safety.
5. **Firearm Arm or Stabilizing Brace:** Manufacture(s) have produced an "arm brace" or "stabilizing brace" which is designed to strap a handgun to a forearm to allow a disabled shooter to fire the firearm. ATF determined that the brace was not a stock and did not constitute creating a short barreled rifle (thus not a National Firearms Act firearm subject to a tax and registration), and that it is simply a tool to shoot a handgun with. However, in the determination letter ATF indicated that if the brace was held to the shoulder and used as a stock it turned into an NFA firearm – thus such use would "redesign" the firearm from a pistol to a short-barreled rifle (an NFA firearm). ATF has never before or since made an NFA determination where a shooter's use alone could redesign and thus reclassify a firearm. It was either designed and intended for use as a pistol, or is a short barreled rifle and the determination, attempting to balance between the two, continues to create concern across the firearms community. ATF can simply amend the determination by 1) continuing to call it a stabilizer brace for firing a handgun (not an NFA); 2) removing the intended use language from the determination; and 3) simply add a cautionary statement to the manufacturer(s) requesting a determination indicating that any attempt by the manufacturer to modify the device or advertise it's capable use as a shoulder stock could change the determination and create an intention to design an NFA short barreled rifle vs. a brace for a handgun. Another

option is to simply rescind the determination and revert back to an earlier ATF determination on this same matter, which called it a handgun (not an NFA) and had no use clause." While many at ATF are concerned about manufacturing processes continuing to push the boundaries and limits between a Gun Control Act (GCA) and National Firearms Act (NFA) firearm, ATF is left to apply standards based on current statutes and leave it to Congress to amend the NFA and/or GCA requirements further if they chose too.

6. Reissue a new Sporting Purpose Study: Since the sunset of the Assault Weapons ban in 2004, the use of AR-15s, AK style rifles, and the like has increased exponentially in sport shooting. These firearm types are now standard for such sporting activities as bore, coyote, and prairie-dog hunting. ATF should re-examine it's almost 20 year old study to bring it up to date with the sport shooting landscape of today, which is vastly different than what it was in 1989 and 1998. Action Shooting Sports such as Three Gun and USPSA have drastically expanded since 1998. Additionally, this restriction on imports serves no public safety interest, as these rifles are already legally available for manufacture and ownership in the United States. Low cost foreign made firearms are still imported and converted into "non-sporting" configurations. These restrictions have only placed arbitrary and undefined limits on importers, while at the same time imposing a heavy and unnecessary workload on FATD. In order to confirm they are "sporting," firearms identical to those previously approved for import are required to be re-submitted to FATD over something as trivial as a new model designation. Imports Branch possesses a list of firearms approved for import but has not made this list public. Lists such as this should be made available to the public so that the importing community does not have to guess as to what the standard for importation is. Additionally, the criteria for what is sporting are vague and not subject to a standard interpretation. While all bolt-action or straight pull firearms are not supposed to be subject to the sporting purpose test, in some instances, ATF has determined that certain non-semiautomatic firearms are non-sporting because of their ease of convertibility to semiautomatic fire. Many of these inconsistencies could be rectified through the publication of a new Sporting Purpose Study along with an updated Imports Branch Guide.
7. Create of Database of Private Letter rulings: The IRS has a vast and sophisticated database of private letter rulings. ATF's database is inaccessible to the public and in many cases, to the ATF itself. Funds should be requested to form a database where past letters are made available to the public online, with privacy information redacted as is done with the IRS. The inability to access these rulings creates inconsistent agency guidance and arbitrary enforcement.

8. Remove the Voluntary Restraint Agreement (VRA) with Russia: In 1996, The Clinton Administration, through the State Department and ATF, negotiated the VRA with the Russian Federation to restrict the import of firearms and ammunition manufactured in the Russian Federation and former Soviet States, only allowing the U.S. industry to import specific models designated in the VRA. The intent of this agreement was to restrict the import of SKS and Makarov pistols, which the Clinton Administration believed, without evidence, were likely to be used in crimes. Since then, these firearms have been abundantly imported in the United States from other countries, and there is no empirical evidence to indicate their widespread use in crimes. Much like the prohibition on the importation of US-origin C&R firearms, the VRA unnecessarily restricts the import of many C&R firearms, highly desired by U.S. collectors, which remain in Russia and the former Soviet States. Again, no public safety nexus has been shown, thus creating an additional unnecessary burden on the Imports Branch.

6-9. **Old Regulations Under Review for Possible Removal or Amendment:** Below a list of the firearms and explosives regulations that are currently under review. They are likely no longer applicable (or portions of which are no longer applicable), and may be removed as part of a final rule to remove expired regulations.

- a. 478.40 – Assault Weapons ban
- b. 478.40a – prohibition language for assault weapons
- c. 478.57(b) and (c) – assault weapons and large capacity magazines
- d. 478.92 (portions) – AP ammo and large capacity magazines
- e. 478.116 (portions) – Importing large capacity magazines
- f. 478.119 – Importing large capacity magazines and feeding devices (belts, drums, strips...)
- g. 478.132 – records keeping for large capacity feeding devices sold to law enforcement
- h. 478.153 – request for large capacity magazines and feeding devices for manufacturer testing
- i. 478.171 (portions) – Exporting AP ammo and semi auto assault weapons
- j. 479.32(a) and (c) – Reduced importer/manufacturer tax rate 1988. Short taxable year standards
- k. 555.11 (portions) – obsolete dates; commerce in explosives
- l. 555.27 (portions) - obsolete dates; explosives background checks
- m. 555.33 (portions) - obsolete dates; licensees and permittees general explosives
- n. 555.41 (portions) - obsolete dates; licenses and permits general explosives
- o. 555.45 (portions) - obsolete dates; licenses and permits general explosives
- p. 555.49 (portions) - obsolete dates; issuance of licenses and permits
- q. 555.51 (portions) - obsolete dates; duration of licenses and permits
- r. 555.57 (portions) - obsolete dates; Change of control, RP's and employees
- s. 555.102 (portions) - obsolete dates; authorized operations by permittees

- t. 555.103 (portions) - obsolete dates; Transactions between licensees and permittees
- u. 555.105 (portions) - obsolete dates; distribution to non licensees and non permittees
- v. 555.125 (portions) - obsolete dates; records maintained by permittees
- w. 555.126 (portions) - obsolete dates; transaction records
- x. 555.142 (portions) - obsolete dates; relief from disabilities
- y. 555.201 (portions) - obsolete dates; storage
- z. 555.224 (portions) - obsolete dates; table of distances

Proposed Legislative Action:

Silencers: Current Federal law requires ATF to regulate silencers under the National Firearms Act (NFA). This requires a federal tax payment of \$200 for transfers, ATF approval, and entry of the silencer into a national NFA database. In the past several years opinions about silencers have changes across the US. Their use to reduce noise at firearms ranges and applications within the sporting and hunting industry are well recognized. Generally speaking 42 states now allow for silencers to be used for sporting purposes. This wide acceptance of silencers and changes within many states' laws has created a significant demand across the country. ATF has had a significant backlog on silencer applications. Despite spending over \$1 million annually in overtime and temporary duty expenses, and dedicating over 33 additional full-time and contract positions since 2011 to support NFA processing over the past several years the processing time is now at 8 months. Despite these efforts processing times are still unacceptable to the eyes of many looking to acquire a silencer. The time and effort spent by silencer manufacturers, the public applying for an NFA weapon, and ATF all fall back to an arguably archaic view of silencers from many decades ago. Over the past 10 years, ATF has averaged less than 44 defendants recommended for silencer-related violations for prosecution a year; of those only six defendants recommended for prosecution had prior criminal convictions (felons). Further, what these statistics do not show is the very minimal actual use of silencers in criminal shootings. Silencer are not viewed as a threat to public safety and could be classified as regular (not NFA) firearms. A change in the Federal Statute would allow for the efficient flow of commerce without excessive oversight and taxation with no detrimental effects. It would also allow ATF to substantially reduce other NFA processing times and re-dedicate some resources towards other critical missions in need.

Any legislative action involving silencers should also revise the definition of a silencer at 18 U.S.C. § 921(a)(24). In addition to controlling completed silencers, the current definition of a silencer extends to "any combination of [silencer] parts, as well as any part intended only for use in" a silencer. Compared to the definition of a firearm, which specifies the frame or receiver is the key regulated part, any individual silencer part, no

matter how small or non-functional as an isolated element, is currently regulated just as if it were a completed silencer. Revising the definition will eliminate many of the current issues encountered by silencer manufacturers and their parts suppliers. Specifically, clarifying when a part or combination of parts meets a minimum threshold requiring serialization, entry into a bound book (registration, if still applicable), and transfer as if a completed object, and what parts (if any) can be manufactured by a non-FFL (and SOT, if still applicable).

4.2. **Firearms Industry Proposals to Allow for Interstate Sale of Firearms at Gun Shows:** ATF, based on Department of Justice input has a longstanding interpretation of 18 U.S.C. 923(j) and supporting regulations that does not allow a Federal Firearms Licensee (FFL) to travel out of state and conduct firearms sales. Many FFLs in the firearms industry would like to be able to travel to other states at venues like a gun show and conduct business. ATF and DOJ have interpreted this to be not allowed under the law. While many legal opinions differ and think the statute could allow for a more favorable interpretation, it appears that a legislative change would be required to allow for interstate licensee sales at gun shows.

ATF currently allows an FFL to travel to another state, display firearms for sale and take orders, but not to transfer on site (this must take place back at the FFL's business location in their home state, and only to a resident of their home state); similarly, FFLs can transfer firearms out of state to another licensee under an "advance consignment" before the gun show to the out of state licensee in a somewhat convoluted process where the traveling/transferring FFL is no longer making the sale. A change to the statute to allow FFLs to operate at gun shows out of state (where allowed by individual state laws) would have no detrimental effect on public safety and still provide ATF a means to trace firearms. It would be viewed favorably by the broad firearms community. Since an FFL has a license, maintains records and conducts background checks for sales, provided they are in compliance with state and local laws there is no apparent harm or risk to public safety in allowing them to do so but not for the current statute requiring in-state only sales. Sales would be documented and traceable, and a background check would be completed.

4.3. **Need for an ATF Confirmed Director:** Since moving from the Treasury to the Justice Department in 2003 ATF has had only one Senate confirmed Director. The agency needs a presidentially nominated and Senate confirmed Director that has the support and backing of the Administration to lead ATF. This will enable the agency to be fully in sync with leadership, and to maximize the agency's potential regarding priorities, budgets and support.

4. **18 U.S.C. 922(o):** As previously mentioned, current law precludes Federal Firearms Licensees who are registered Special Occupational Taxpayers (FFL/SOTs) from transferring machineguns manufactured post 1986 unless they are for export or for law enforcement/government use; and there is no provision for the transfer from one FFL/SOT to another. This is detrimental to FFL/SOTs operating within the small but useful DoD supported industry. A change in the statute to allow for limited approval for FFL/SOTs to transfer between each other within this community would have no impact on violent crime. Domestic co-production by FFL/SOTs is also problematic and could be resolved with a change to the statute. Another option if supported by the Department of Justice would be to re-institute ATF's ability to provide "variances" to licensees, as ATF has done in the past that would adequately provide for transfers within defense industry FFLs and avoid a requirement to change the statute. However, without a legislative fix such "variances" would be easily susceptible to changes or withdrawal over time.

8.5. Destructive Devices: The current definitions for destructive devices under both the NFA (26 U.S.C. § 5845(f)) and the GCA (18 U.S.C. § 921(a)(4)), and applicable controls, do not differentiate between destructive device launchers and destructive device munitions. Applicable regulatory and statutory controls under the GCA and NFA are focused on multi-use objects, such as typical long guns or machine guns, not single-use, expendable munitions which are also subject to the Safe Explosives Act. The customer base for destructive device munitions is very limited—the U.S. DOD, foreign governments as approved by DDTC under current export policy, and small numbers of other destructive device launcher and/or munitions manufacturers for use in research, testing, or assistance in USG/foreign contract fulfillment. In addition, the cost of munitions production runs, safety, and contract fulfillment requirements such as applicable DOD marking requirements necessitate, at a minimum, different standards for marking munitions than are possible for launchers. This includes marking by lot numbers and having multiple dispositions against a single lot number. There are several different ways to revise applicable statutory and regulatory controls to help solve these issues, as being currently discussed by ATF and destructive device munitions industry members. One option would be revising 18 U.S.C. § 922(k) to clarify that markings added to assist traceability (such as a prefix/suffix added to a serial number to indicate an end user or disposition against an already-registered lot) are not considered in violation of the statute. Another option could be splitting the definition of destructive devices, so that launchers remain under the GCA/NFA, but munitions are solely regulated under explosives laws. The simplest solution could be to revise the serial number laws to allow any DOD-mandated marking schemes as the default marking for all destructive device munitions, but giving manufacturers the ability to apply for variances to accommodate foreign government marking requirements.

- 4.6. National Concealed Carry: Various proposals exist for concealed carry permits to be valid across the nation. ATF would have limited, if any direct oversight over such a program and should have no significant concerns.

Regulatory Areas for Further Discussion:

1. **Demand Letter 2 (DL 2)**: Via regulation ATF currently requires Federal Firearms Licensees (FFLs) across the nation that have had 10 or more guns traced to them in a previous year with a time-to-crime of three years or less to provide copies of limited information from used firearms they acquired the previous year to ATF. This equates to limited "used" or "gray market" gun information (no purchaser information is directly stored by ATF, only gun information) that can be used to open up more trace results for secondary market firearms. This information can be useful to further crime gun trace capabilities by creating a pointer to allow for a more current firearms trace to a secondary purchaser. The number of "10" gun traces in a year back to a particular FFL is determined by ATF. This number was shifted downward from 25 guns in previous years to 10 more recently. ATF is currently re-examining the program and anticipates a change to the number (somewhere in the vicinity of 15 or more) based on trend and data analysis. Some have argued that DL 2 creates a burden on firearms dealers to provide ATF information on used firearms that may become, but are not necessarily crime guns. An increase in the firearms requirement above 10 would likely have a positive impact on the firearms industry and still meet program objectives.
2. **Demand Letter 3 (DL 3)**: Via regulation ATF currently requires Federal Firearms Licensees (FFLs) in several Southwest Border States to record and submit multiple sales records for certain semi-automatic rifles capable of shooting with a detached magazine (although not defined as such by law or regulation, this applies to the sale of more than one rifle commonly referred to as a "modern sporting rifles", sold to the same person at the same time). This requirement came into effect several years ago in an attempt to curb the flow of rifles from commerce to the criminal element via illegal firearms traffickers into Mexico and South America. There are examples where this regulation has proven effective and may provide a deterrent effect. Over the past five years, ATF has over 40,000 multiple sales reports involving over 90,000 rifles; opened over 300 investigations and recommended approximately 374 defendants for prosecution. DL 3 places some burden on the firearms industry via reporting requirements. The elimination of DL 3 could have a detrimental effect towards ATF's criminal enforcement mission based on the numbers of investigations and defendants seen to date, but can be further discussed regarding utility and impact.

3. **Pending ATF Regulation Regarding FFL Records Retention (20 years):** ATF Currently has a regulation pending at the Department of Justice to increase the requirements for Federal Firearms Licensees (FFLs) to retain records indefinitely. The current standard is 20 years, and records older than 20 years can be destroyed. The intent of the change from 20 years to indefinite retention is to provide access to records for firearms traces over longer periods of time. Practically however, crime guns are not frequently recovered with times to crimes from purchases over 20 years old. Also, older firearms possessed by criminals frequently transfer hands several times and a trace will often not lead to the criminal after so much time has passed. ATF has averaged approximately 1,200 failed traces a year over the past 5 years due to records destruction, accounting for less than one half of one percent of traces conducted nationally each year. While such an extension is arguably a viable law enforcement intelligence tool, much of the firearms industry is opposed to such a change and its limited value of such data questions the merits for the need to change this longstanding rule.

3.4. Expanding Permissive Use of NICS Checks by FFL Holders: Standard pre-employment background checks frequently do not reveal that a person is firearms-disabled. Other than requiring potential hires to purchase a firearm, licensees, in particular large retailers, are frequently unable to determine that an employee cannot be involved in firearms operations. Large retailers in particular would appreciate the ability to run a NICS check on current employees or potential new hires to ascertain whether they can legally fulfill their job requirements. The key aspect of this proposal is that it would be entirely elective—if the FBI/ATF/Congress all concurred with this slight expansion of the use of NICS, there should be no mandate that licensees perform a NICS check on all employees. Keeping the expansion of the system limited to elective employee checks will prevent any significant increase in cost to the FBI or ATF (in terms of running background checks or expanding regulatory enforcement), while it will enable FFLs to increase their compliance with existing regulations and help ensure firearms-disabled personnel do not have easy access to firearms.

Conclusions:

There are many regulatory changes that can be made by or through ATF that would have an immediate, positive impact on commerce and industry without significantly hindering ATF's mission or adversely affecting public safety. Congress can also act to clarify statutes to remove ATF from unnecessary bureaucratic processes without putting the public at risk. Opportunities currently exist to review many of these firearms issues at hand and to take reasonable corrective steps to de-regulate or lessen burdens on the firearms industry with no discernible impact to public safety. Alleviating some of these concerns would continue to support

relationships across the firearms and sporting industry with ATF, and allow ATF to further focus precious personnel and resources on the mission to combat gun violence.

Note: The opinions expressed within this white paper are not those of the Bureau of ATF; they are merely the ideas and opinions of this writer. They are provided for the new administration team's consideration and not intended to be public. They are also general thoughts that cannot be taken as exacting language regarding policy or quotable specifics. Additional specific details can be provided to further these general discussions.

The men and women of ATF are overwhelmingly a fantastic group of hard working civil servants who look to reduce violent crime and ensure public safety. The focus on combating gun violence is key. Fairly regulating the firearms and explosives industries is also important. As the firearms conversations take place over the next few months and years this paper is offered to provide informal insight on potential productive ways to limit regulation and continue to protect our second amendment freedoms while focusing on ATF's mission to protect our nation.

Mark Barnes (b) (6)

1/9/2017 5:59 PM

Re: Draft Ideas

To ronaldturk (b) (6)

I am on it. Best regards, Mark

On Jan 9, 2017, at 4:20 PM, ronaldturk (b) (6) wrote:

Hello Mark. Attached is a draft of what I mentioned, intended to identify potential "hot" regulatory issues for the new team. Please disregard any poor use of my English language skills - this was written solely by me (with the exception of an EPS darts section regarding old regs proposed for removal from the books), and not edited well yet. If I am missing the mark on a major issue or disregarding a major discussion point any feedback you have would be appreciated. My hope is that the agency can demonstrate flexibility where appropriate and identify areas for further discussion, recognizing that solving everyone's concerns on each side would be difficult as well.....

See you next week.

Ron

<White Paper Turk final draft 1.2017.docx>

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Re: Draft Ideas-MB Edits

To: (b) (6) (b) (6) > Copy
Mark Barnes (b) (6)

(b) (6) Got a chance to read this on the flight back to DC. Some great additional thoughts, many of which I agree with and will include. I appreciate the time you and Mark took on this - thanks again.

Ron

From: (b) (6)
To: ronaldukturk (b) (6)
Cc: Mark Barnes
Sent: Tuesday, January 17, 2017 11:46:48 AM
Subject: Draft Ideas-MB Edits

Hi Ron,

Mark asked me to send back the changes to your draft. Please let me know if you have any questions.

(b) (6)

Attorney

Mark Barnes & Associates
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(b) (6)

<(b) (6)>

1/17/2017 11:46 AM

Draft Ideas-MB Edits

To ronaldtur (b) (6) Copy Mark Barnes (b) (6)

Hi Ron,

Mark asked me to send back the changes to your draft. Please let me know if you have any questions.

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