

# **EXHIBIT B**



**Murder  
Accountability  
Project.**

7927 Jackson Road, Alexandria, VA 22308

[www.murderdata.org](http://www.murderdata.org)

Phone: 571-606-5999

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August 18, 2020

Jessica R. Rogers, Indian Affairs FOIA Officer  
U.S. Department of the Interior  
Assistant Secretary - Indian Affairs  
Freedom of Information Act Office  
1849 C Street, N.W., MS-4660-MIB  
Washington, D.C. 20240  
foia@bia.gov

**Re: FOIA Request for Homicide Records**

Dear Jessica Rogers:

Pursuant to the Freedom of Information Act, 5 U.S. Code § 552 (“FOIA”), the Murder Accountability Project (“MAP”) hereby requests copies of all records in your agency’s possession or control in the two categories described below, and a waiver of processing and reproduction fees for the reasons that follow:

First, please provide all records your agency maintains, in any electronic format, that contain details about any murders, homicides and/or manslaughters for which your agency had primary jurisdiction or was lead investigative agency, from January 1, 1989, until the date of production of records in response to this request. For purposes of this part of the request:

- Please provide all records electronically, with any that are maintained and/or are producible in machine-readable format, such as Excel or delimited text, to be provided in that format, and at a minimum all records should be provided in at least as robust a format as they are maintained within your agency.
- Please ensure that your query includes, *but is not limited to*, searching for records kept or reported to the BIA’s crime records-management system and any similar database that is maintained by your agency.
- Although MAP consents to the redaction of names, social security numbers, alien registration numbers, or dates of birth (but not age) from these records, this request specifically asks that the records produced include, *but not be limited to*, the following data fields:
  - Originating Agency making the report
  - State where the crime occurred

- County where the crime occurred
- Year the crime occurred
- Month the crime occurred
- Incident number
- Situation designator of number of victims/offenders
- Age of Victim(s)
- Gender of Victim(s)
- Race of Victim(s)
- Ethnicity of Victim(s)
- Age of Offender(s)
- Gender of Offender(s)
- Race of Offender(s)
- Ethnicity of Offender(s)
- Weapon(s) used
- Relationship (if any) between Victim(s) and Offender(s)
- Circumstances (or theory) of the Crime
- Subcircumstances (when deceased is a felon)
- Number of Additional Victims
- Number of Additional Offenders
- File Date, *i.e.*, date record was reported
- Whether any arrest(s) occurred

Please provide the records electronically to the email address provided above or, if the files are too large to email, please contact that email address to arrange for download of records from a drop-box, secure FTP site, or similar mechanism; otherwise, please send records on a drive or similar electronic data-storage device to the address above.

Second, for all records produced in response to the above request, if any data field identified in the sub-bullets to the third bullet of the request are missing, please provide all *other* records that your agency maintains – whether electronically, in hard-copy, or otherwise – that provide the missing information. For these records, to the extent any redactions of identifying information from the records responsive to the first part of the request or to this part of the request remove details necessary to discern which records correspond to each other – *i.e.*, if matching records by incident is impeded – please ensure any redactions assign unique identifiers that allow corresponding records to be identified and matched.

Please provide these records electronically to the extent that your agency maintains them electronically, in the manner requested as to the first part of this request; otherwise, please send any hard-copy records to the address above.

If any information described above is withheld, we request copies of all non-exempt, reasonably segregable portions of such materials, as well as a detailed statement of the statutory basis and reasons for each instance of withholding, including specifically but not limited to the FOIA exemption relied upon for such withholding, and an index or similar statement of the nature of any materials withheld.

If any requested documents require pre-release processing, we ask that any remaining documents be made available in advance of processing the entire request. To expedite this request, we are willing to discuss in advance of a final determination any questions you may have concerning the request, and/or to discuss the scope of the request, if you contact us to do so.

MAP respectfully requests a waiver of all fees for this request in accord with 5 U.S.C. § 552(a)(4)(A)(ii)-(iii), as disclosure of the records sought is in the public interest, because it is likely to contribute significantly to public understanding of the operations or activities of the federal government's law enforcement agencies and operations, and it is not primarily (or at all) in MAP's commercial interest. MAP is a nonprofit group organized in 2015 and dedicated to disseminating information and educating Americans on the importance of accurately accounting for unsolved homicides. MAP elicits information from federal, state and local governments about unsolved homicides and publishes it online at no charge. Its Board of Directors is composed of retired law enforcement investigators, investigative journalists, criminologists and other experts on various aspects of homicide. MAP was created as a direct outgrowth of a national reporting project into unsolved homicides that received the Philip Meyer Journalism Award by the National Institute of Computer Assisted Reporting for outstanding journalism using social science techniques. The records sought in this request will shed light directly on the efficacy of the agency's law enforcement efforts, and on the way in which it maintains related data and makes them available to the public, government bodies, researchers, and other stakeholders. MAP has a demonstrated ability to analyze, synthesize, and report on these matters of public concern, in a manner that is available to and reaches the public on a widespread basis.

In addition, homicide detectives nationwide regularly utilize data MAP posts online and contact MAP seeking assistance in complex records searches. Several states conduct so-called "new detective" schools and advise law enforcement attendees about MAP's free online databases. MAP officials have demonstrated the utility of these records in active and cold-case investigations at the annual meetings of the International Homicide Investigators Association ("IHIA"), Mid-Atlantic Cold Case Investigators Association, South-eastern Homicide Investigators Association ("SEHIA") and the Annual Counterterrorism Conference hosted by the New York Police Department. MAP officers also demonstrated its datasets and search algorithms at informal meetings of analysts at the Department of Homeland Security and the Intelligence Bureau of the New York Police Department.

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We look forward to your response within twenty (20) working days from the date you receive this request, as required by 5 U.S.C. § 552(a)(6)(A)(i). Please call the undersigned if you have any questions. Thank you for your attention in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Thomas Hargrove".

Thomas Hargrove  
Chairman  
Murder Accountability [Project](#)