

# **EXHIBIT 3**



**Judicial  
Watch**<sup>®</sup>  
*Because no one  
is above the law!*

June 12, 2013

**VIA CERTIFIED MAIL**

Mr. Sami Naim  
Deputy Records Access Officer  
The City of New York  
Office of the Mayor  
City Hall  
New York, NY 10007

**Re: New York Freedom of Information Law Appeal**

Dear Mr. Naim:

On January 15, 2013, I submitted to the Office of the Mayor a New York Freedom of Information Law (FOIL) request seeking the following records:

1. Any and all records of communication between Mayor Bloomberg and/or any official, employee, or representative of the Office of the mayor and any officer, employee, or representative of Mayors Against Illegal Guns.
2. Any and all records of communication between Mayor Bloomberg and/or any official, employee, or representative of the Office of the Mayor and Vice President Joe Biden and/or any official, employee, or representative of the Office of the Vice President of the United States.
3. Any and all records regarding, concerning, or related to the January 9, 2013 White House meeting attended by Chief Advisor to the Mayor for Policy and Strategic Planning John Feinblatt, Vice President Biden, Attorney General Eric Holder, and others (including, but not limited to, any and all notes, talking points, briefing books, and internal memoranda produced in preparation for, during, and/or subsequent to the meeting).

The time frame for the request was December 14, 2012 to the present.

Shortly after our submission of the request, I received from the U.S. Postal Service a return receipt indicating that the request letter had been received in your office on January 22, 2013.

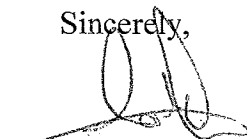
**Office of the Mayor**  
**NY FOIL Appeal**  
**June 12, 2013**  
**Page 2 of 2**

In March 2013, I received from you a letter dated March 8, 2013, acknowledging your receipt of the request. The letter concludes, "Please note that I am currently reviewing your request, and expect to respond in twenty (20) days informing you of the status of this review."<sup>1</sup> To date, I have received no further communication from the Office of the Mayor regarding the request or the status of your review. Consequently, I consider the request to have been denied, and I am appealing on that basis.

As required by the Freedom of Information Law, the head or governing body of an agency, or whomever is designated to determine appeals, is required to respond within 10 business days of the receipt of an appeal. If the records are denied on appeal, please explain the reasons for the denial fully in writing as required by law.

Thank you for your time and assistance. If you have any questions or are in need of any additional information, please don't hesitate to contact me at [sdunagan@judicialwatch.org](mailto:sdunagan@judicialwatch.org) or (202) 646-5172.

Sincerely,



Sean Dunagan  
Judicial Watch, Inc.

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<sup>1</sup> Copies of the January 15, 2013 request letter and your March 8, 2013 acknowledgement are enclosed herein for your reference.

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Sami Naim  
Deputy Records Access Officer  
Office of the Mayor  
City Hall  
New York, NY 10007

2. Article Number  
(Transfer from service label)

PS Form 3811, February 2004

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*L. Birch*  Addressee

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C. Date of Delivery *6/18/2013*

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