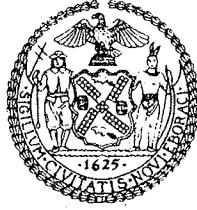


EXHIBIT 4



THE CITY OF NEW YORK
OFFICE OF THE MAYOR
NEW YORK, N.Y. 10007

SAMI Y. NAIM
ASSISTANT COUNSELOR

June 26, 2013

Sean Dunagan
Judicial Watch
425 Third St. SW
Suite 800
Washington, DC 20024

Dear Mr. Dunagan:

I write to you today regarding your Freedom of Information Law ("FOIL") request for the following records within the timeframe of December 14, 2012 to January 22, 2013:

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. This request includes, but is 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.

Please be advised that the Office of the Mayor has been actively processing your request since we acknowledged receipt thereof. We apologize if the inadvertent lack of a timely status update had suggested otherwise. Therefore, due to the fact that we continue to process your request, we believe FOIL Section 89(4)(a) does not apply to this situation and your purported appeal is premature at this juncture.

Regarding Items # 2 and # 3 of your request, we anticipate being able to provide you with a determination in approximately two (2) months. This timeframe is primarily due to the fact that your request seeks a significant amount of agency records that must be reviewed by our legal staff before a final determination can be made. Indeed, the broad scope of Items # 2 and # 3 of your request has resulted in a situation where our legal staff must review thousands upon

thousands of records to determine whether such records are responsive to Items # 2 and # 3 of your request and, if so, whether such records are subject to disclosure under FOIL.

Regarding Item # 1 of your request, please be advised that this portion of your request is not reasonably described as required under FOIL Section 89(3)(a). A request reasonably describes records when the description provides sufficient ability, with reasonable effort, to launch an effective search to locate and identify the records sought. In this case, an effective search to locate and identify responsive records cannot be launched because the Office of the Mayor lacks the ability to search for all the emails of "any official, employee, or representative of Mayors Against Illegal Guns." Indeed, Mayors Against Illegal Guns is a bipartisan coalition of over 900 mayors from big cities and small towns from across the country. Responding to such a request would "involve the equivalent of search for the needle in the haystack," which the Committee on Open Government has opined is an endeavor that an agency is not obligated to undertake, "even if it is known that the needle is somewhere within the haystack." FOIL-AO-18045 (March 15, 2010). Given the foregoing, if you would like to amend this portion of your request, this office will process it in an appropriate manner. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Sam Naim", written over a vertical line.

Sam Naim
Deputy Records Access Officer