



**U.S. Department of Justice**

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

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www.atf.gov

March 2, 2022

REFER TO: 2020-0802

VIA Email: [REDACTED]

Dear Mr. Olson:

This responds to your Freedom of Information Act (FOIA) request dated June 1, 2020, and received by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) on the same day, in which you requested records concerning the ATF Processing of Dealer "Out of Business" Records.

This is a rolling production and this is **Release One**. In response to your request, we have processed a total of 312 pages of responsive material.

You have requested material that ATF is required to maintain pursuant to the Gun Control Act (GCA) and/or is information contained in ATF Firearms Trace System database. This information is exempt from disclosure pursuant to Exemption (b)(3) of the FOIA and Public Law 112-55, 125 Stat. 552.

Exemption (b)(3) of the FOIA permits the withholding of information prohibited from disclosure by another statute only if one of two disjunctive requirements are met: the statute either (A) requires that the matters be withheld from the public in such a manner as to leave no discretion on the issue, or (B) establishes particular criteria for withholding or refers to particular types of matters to be withheld. Thus, a statute falls within the exemption's coverage if it satisfies any one of its disjunctive requirements.

Beginning in 2003, Congress placed restrictions on ATF's disclosure of certain GCA related information. In short, ATF can only provide certain GCA data to a law enforcement agency or a prosecutor solely in connection with a criminal investigation or prosecution. Beginning in Fiscal Year 2006, Congress included a provision within each iteration of the restriction, which effectively made the law permanent.

The most recent iteration of these various restrictions was included in ATF's 2012 Appropriation Bill, Public Law 112-55, 125 Stat. 552. Some of the information in the requested records falls within this restriction. Since the Fiscal Year 2006 through 2008 restrictions satisfy all the requirements of FOIA Exemption (b)(3), and the 2012 language is perpetuated from those

Mr. Robert Olson

restrictions, I am withholding the trace data pursuant to 5 U.S.C. § 552 (b)(3) and Public Law 112-55, 125 Stat. 552.

We are withholding third party information, including the names of ATF employees, under FOIA Exemption (b)(6). To disclose personal information about a living individual to a member of the public, we need the written consent from the persons whose information you requested. Without written consent, proof of death, or an overriding public interest, personal information is exempt from disclosure under the FOIA. The FOIA does not require agencies to disclose information that would constitute a clearly unwarranted invasion of the personal privacy of third parties (5 U.S.C. § 552(b)(6)).

We are withholding the specific law enforcement techniques and procedures used in our investigation pursuant to Exemption (b)(7)(E) of the FOIA. Exemption (b)(7)(E) exempts from mandatory disclosure records or information compiled for law enforcement purposes when production of such records or information “would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law” (5 U.S.C. § 552(b)(7)(E)). The information withheld reveals specific law enforcement procedures and techniques used in this investigation. Disclosure of such information could enable individuals outside of the agency to circumvent agency functions and gain access to sensitive investigative information.

For your information, Congress excluded three discrete categories of law enforcement and national security records from the requirements of the FOIA. *See* 5 U.S.C. § 552(c). This response is limited to those records that are subject to the requirements of the FOIA. This is a standard notification that is given to all our requesters and should not be taken as an indication that excluded records do, or do not, exist.

You may contact our FOIA Public Liaisons, Darryl Webb or Zina Kornegay, at (202) 648-7390, for any further assistance and to discuss any aspect of your request. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, Room 2510, 8601 Adelphi Road, College Park, Maryland 20740-6001, e-mail at [ogis@nara.gov](mailto:ogis@nara.gov); telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

If you are not satisfied with my response to this request, you may administratively appeal by writing to the Director, Office of Information Policy (OIP), United States Department of Justice, 441 G Street, NW, 6th Floor, Washington, D.C. 20530, or you may submit an appeal through OIP's FOIA STAR portal by creating an account following the instructions on OIP's website: <https://www.justice.gov/oip/submit-and-track-request-or-appeal>. Your appeal must be postmarked or electronically transmitted within 90 days of the date of my response to your request. If you submit your appeal by mail, both the letter and the envelope should be clearly marked “Freedom of Information Act Appeal.”

Mr. Robert Olson

Sincerely,

A handwritten signature in black ink, appearing to read "A. Siple".

Adam C. Siple  
Chief  
Information and Privacy Governance Division

Enclosure

## **Response to FOIA 2020-0802:**

- **records identifying the current number of pages of records housed by the OOB Records Center;**

All counts are as of 9/25/2020

Total of OOB Pages (imaged in ECM-OBR and pending imaging) = **461,235,863**

- Total OOB Pages in ECM-OBR = 420,350,563
- Approximate pages to be imaged from the Warehouse = 40,885,300.

Total Digital Reel Image Count = **397,009,542**

- 382,797,000 images from microfilm rolls in Digital Reel
- 14,212,542 images from microfiche in Digital Reel

\*The Digital Reel system is utilized by the NTC Division to store and retrieve OOB records that were received and processed by ATF prior to 2006 using microfilm/microfiche.

- **records showing how OOB records are currently stored by ATF, including whether Forms 4473 and/or "bound books" are being scanned into digitized form, and/or turned into a searchable database through manual entry or use of "optical character recognition" software;**

In mid-February of 2017 all OOB records stored in the Out-of-Business Records Imaging System (OBRIS), were migrated over to the new ATF Enterprise Content Management (ECM) system. The Enterprise Content Management (ECM) system utilizes Oracle WebCenter to provide a set of modular Commercial off the Shelf (COTS) products, which meet ATF high volume content management requirements, delivering the information via a web portal. The ECM system allows digital content to be centrally managed and shared by multiple applications and business groups across the ATF enterprise. The products support the high volume capture, Indexing, Storage, Search, and Retrieval of digital content received from high volume scanners, data conversion utilities, and native electronic content.

User Roles include user and system administration for Capture, Content, and Portal. System access is controlled by pulling credentials from Active Directory via WebLogic. Access variables set in the WebCenter framework are mapped to the roles and privileges in the Active Directory groups of an identical name.

The security groups for the Enterprise Content Management project include FELC, FFLC, FEIB, AFMER and **OBR**. As users are added to the system, they will be assigned to one or more groups dependent on their job function and depending upon what Groups' documents they should be granted access. The National Tracing Center (NTC) Division utilizes the OBR security group to store digital images (.tiff or .pdf format) of OOB records, which includes acquisition and disposition logbooks, along with Forms 4473 and other required records.

When paper records are received from a FFL that has discontinued business, the NTC Division scans the documents as .TIFF image files using high-speed IBML scanners. The Post Scan process, utilized to upload the .TIFF image files into the ECM-OBR repository, converts the images to a .PDF format for storage and retrieval. The files are stored as images (with no optical character recognition software). OOB records cannot be searched using free-form text queries. The OOB image files are indexed (tagged) by FFL number. This allows NTC personnel to identify a group of OOB records through a FFL number search, and then manually scan through the FFL records to locate a particular transaction.

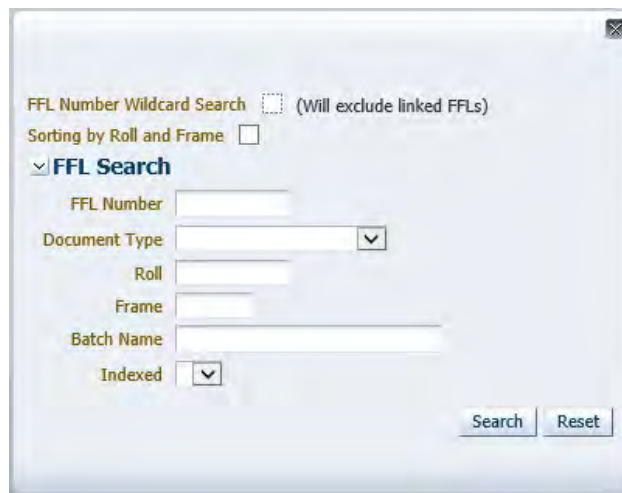
For those FFL's who submit OOB records in an electronic format, the NTC Division converts the data to a .PDF file format that is consistent with the processing of paper records. In addition to indexing the electronic Acquisition & Disposition records by FFL number, the eMedia conversion process also extracts metadata relative to the firearm description (Serial Number, Manufacturer, Type, Caliber/Gauge, Model, and date of acquisition). This allows NTC personnel to query the ECM-OBR repository by serial number, rather than having to search by FFL number and then manually scan through all of the FFL's OOB records to locate a particular transaction.

The OBR Security Group within the Enterprise Content Management system does not allow users to search by name. As illustrated in the screenshots below, users can only conduct a "FFL Search" and a "Serial Number Search". The available fields for each type of search are displayed below:

### FFL Search

FFL Search leverages WebCenter Portal to perform a search and view scanned and imported images/documents. By default, the images will open in the configured image viewer on the user workstation.

1. Initiate an FFL Search by clicking the **Search** button. A dialog box is displayed.



### FFL Search Criteria

2. Enter the search criterion. Click the **Search** button to initiate the search.

**Note:** To search using a wildcard by clicking the checkbox next to the label 'FFL Number Wildcard Search'. To use the wildcard in front of the string enter %12345 and click the FFL Number Wildcard search checkbox.

3. The system displays the returned search results based on the selected criterion.


View	FFL Number	Document Type	Roll	Frame	Batch Description	Batch Name	Documents	Batch Date	Copy	Create Weapon Transaction
	7500528	Worksheet	60142	1.1430			62			
	9523467	Form 4473	32559	1.1092			501			
	7500528	Worksheet	60141	2.501			80			
	9523467	Form 4473	32553	1.5773			251			
	9523467	Form 4473	32560	1.3765			251			
	9523467	Form 4473	32544	1.5511			501			
	9523467	Form 4473	32559	1.7815			257			
	5234688	Worksheet	43544	26.31			6			
	8303852	Worksheet	43541	34.8			316			
	9523467	Form 4473	32574	1.3812			251			
	9523467	Worksheet	32548	1.8			251			
	3339653	Worksheet	43453	1.6176			300			
	3339653	Worksheet	43454	1.5342			300			
	9523467	Form 4473	32564	1.3587			581			
	3418352	Worksheet	15037	1.3657			304			
	4235282	Worksheet	60069	5.1089			300			
	9523467	Form 4473	32557	1.3263			251			
	9523467	Form 4473	32544	1.5511			581			

### FFL Results Summary

4. To narrow the returned search results, filter by entering additional criteria over each of the column labels if a white box is displayed. **Note:** This filter is case sensitive. If the white box is not displayed, click the **Query by Example** icon to filter by the available fields. A user can filter results using the fields above the labels FFL Number, Document Type, Roll, Frame, Batch Description, Batch Name and Documents.

View	FFL Number	Document Type	Roll	Frame	Batch Description	Batch Name	Documents	Batch Date	Copy	Create Weapon Transaction
	7500528	Worksheet	60142	1.1430			62			
	9523467	Form 4473	32559	1.1092			501			
	7500528	Worksheet	60141	2.501			80			
	9523467	Form 4473	32553	1.5773			251			
	9523467	Form 4473	32560	1.3765			251			
	9523467	Form 4473	32544	1.5511			501			

### Query By Example

5. Select a document/image to view, by clicking the **View** icon  in the View column on the item row to view the document.

### Serial Number Search

Serial Number Search leverages WebCenter Portal to perform a search and view scanned and imported images/documents. By default, the images will open in the configured image viewer on the user workstation.

1. Initiate a Serial Number Search by clicking the **Search** button. A dialog box is displayed.

FFL Number Wildcard Search  (Will exclude linked FFLs)

Serial Number Wildcard Search

Sorting by Roll and Frame

Serial Number Search

Serial Number

FFL Number

Transaction Date  -

Document Type

Roll

Frame

Search Reset

### Serial Number Search Criteria

2. Enter the search criterion. Click the **Search** button to initiate the search.

**Note:** To search using a wildcard click the checkbox next to the label '**Serial Number Wildcard Search**'. To use the wildcard in front of the string enter %12345 and click the **Serial Number Wildcard Search** checkbox.

3. The system displays the returned search results based on the selected criterion.

Serial Number	Document Type	FFL Number	Roll	Frame	Manufacturer	Weapon Type	Caliber	Model	Transaction Date	Batch Description	Batch Name	Copy	Comments	Update
12345a		5435486	72826	2.7076										
692649		5435486	72826	2.7076										
12345b		5435486	72826	2.7076										
692649		5435486	72826	2.7076										
12345c		5435486	72826	2.7076										
12345d		5435486	72826	2.7076										
692649		5435486	72826	2.7076										
1D42821		5435444	70333	62.6										
12345e		5435486	72826	2.7076										
NF239422	Voided Doc.	5435450	41541	27.26										
014588	State Form	5435471	41129	54.11										
NG006677	State Form	5435471	41129	54.11										
983404	State Form	5435471	41129	54.11										
436201	State Form	5435471	41129	54.14										
22006545	State Form	5435471	41129	54.17										
006688	State Form	5435471	41129	54.12										
943395	State Form	5435471	41129	54.12										

### Serial Number Results Summary

4. To narrow the returned search results, filter by entering additional criteria over each of the column labels if a white box is displayed. **Note:** this filter is case sensitive. If the white box is not displayed, click the **Query by Example** icon to filter by the available fields. A user can filter results using Serial Number, Document Type, FFL Number, Roll, Frame, Manufacturer, Weapon Type, Caliber, Model, Batch Description, Batch Name and Comments.


Home Dealer Search FEIB Search Query By Example OBR

Serial Number Search FFL Search Non Dealer Search Dealer Maintenance

File View Search Reset Filter Total Records: 5

View	Serial Number	Document Type	FFL Number	Roll	Frame	Manufacturer	Weapon Type	Caliber	Model	Transaction Date	Batch Description	Batch Name	Copy	Comments	Update
	12345a		5435486	72826	2.7076										
	12345e		5435486	72826	2.7102										
	12345d		5435486	72826	2.7076										
	12345c		5435486	72826	2.7076										
	12345b		5435486	72826	2.7076										

### Query By Example

5. Select a document/image to view, by clicking the **View** icon  in the View column on the item row to view the document. The web application will display the selected file in the native viewer setup on the user's desktop/laptop. By default, the document/images display in the default viewer in a separate window.

For more information, please reference the attached “REF-Media Conversion Process Chart” and “WI-Media Conversion\_v11”. Additionally, “Media A&D Upload File Examples” provides examples of how electronic A&D’s are converted to PDFs, and depicts the associated XML file (ties the PDFs to the FFL and correlated batches for ECM upload), and weapons file (contains firearm and batch information only, no PII).