

July 31, 2017

Kathy Ray
United States Department of Transportation
1200 New Jersey Ave., SE
W94-122
Washington, DC 20590

Re: Complaint #2016-0059, *BRIDGE, et al., v. State of Maryland, et al.*

Dear Ms. Ray:

On behalf of the NAACP Legal Defense Fund, the Baltimore Transit Equity Coalition, Mr. Earl Andrews, and the Baltimore Regional Initiative Developing Genuine Equality, Inc. (BRIDGE), we hereby request that, pursuant to the Freedom of Information Act, 5 U.S.C. § 552, the United States Department of Transportation¹ (Department) provide the following information:

- (1) All documents,² related to the United States Department of Transportation's investigation and closure of Complaint #2016-0059, *BRIDGE, et al., v. State of Maryland, et al.*, filed on December 21, 2015, including but not limited to:
 - a. All communications,³ including letters, emails, and attachments, between the Department and the State of Maryland, its agencies, and its officials and employees, related to the aforementioned complaint;⁴
 - b. All communications within the Department and with other agencies and officials of the United States related to the complaint;
 - c. All findings and conclusions of fact or law related to the aforementioned complaint, including those related to the Maryland Department of Transportation's change to the "Quick 40" bus route;

¹ This shall include the Office of the Secretary of Transportation, as well as the other sub-agencies of the Department, including the Federal Highway Administration.

² The term "document" is to be interpreted in the broadest possible sense within the meaning of the Freedom of Information Act and shall include, without limitation, any written, printed, typed, spoken, computerized, or other graphic, phonic, or recorded matter of any kind or nature, however produced or reproduced, whether sent or received or neither, including drafts and copies bearing notations or marks not found on the original.

³ The term "communications" should be interpreted to apply to any communications initiated by the United States Department of Transportation or initiated by a party external to the Department, as well as any attachments to any electronic communications.

⁴ This includes, at a minimum, the State's response to the complaint, any information provided by the State in support of its position since the filing of the complaint, and the Department's letter to Maryland Secretary of Transportation Pete K. Rahn on March 20, 2017.

- d. Any studies, including the results of these studies, or research memoranda, undertaken or created by the Department in response to the complaint;
- e. All evidence collected by or provided to the Department during the Department's investigation of the complaint; and
- f. Any documents, including electronic mail, memoranda and other communications, reflecting, justifying or providing the basis for the Department's decision to close the complaint on July 13, 2017.

If you determine that some portions of the requested records are exempt from disclosure, we will expect, as the Act provides in § 552(b)(9), that you provide us with "any reasonably segregable portion" of the records sought. Additionally, we expect that you will provide the statutory basis for each individual redaction or withheld document.

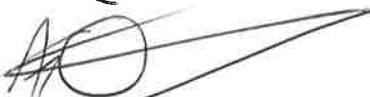
In order to determine the applicability of any fees, LDF is a non-profit, public interest organization and this request is not for commercial use. We request a waiver of all fees for this request because disclosure of the requested information is in the public interest. Disclosure is likely to contribute significantly to public understanding of the Department's activities because LDF will use such information to inform its public education and advocacy efforts. In the event that a waiver of fees is not granted, we request a line item estimation of the fees and the basis for the fee request.

If all or any part of this request is denied, please provide us with a written statement of the grounds for the denial, citing the law or regulation under which you believe you may deny access. If this is the case, we also request that you inform us of the available remedies for review of the denial.

It is essential that this request be responded to within 30 days, as required by § 552(a)(4)(B). If we do not receive a response within 30 days, we will treat your failure to respond as a denial and seek appropriate judicial relief.

If possible, we ask that the information we request be provided in electronic format. Please address any responses to this FOIA request to Ajmel Quereshi, whose contact information is below. We appreciate your attention to this matter.

Sincerely,



Ajmel Quereshi
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