



July 12, 2018

VIA EMAIL

Erin Davis
Illinois State Police
Freedom of Information Officer
801 South 7th Street, Suite 1000-S
Springfield, Illinois 62703
FOIA_Officer@isp.state.il.us

Re: Illinois Freedom of Information Act Request Regarding Targeted Violence Prevention Program

To Freedom of Information Officer,

This is a request under the Illinois Freedom of Information Act, 5 ILCS 140/1 *et seq.*, submitted on behalf of Muslim Advocates and the ACLU of Illinois.

Background

Muslim Advocates and the ACLU of Illinois seek records pertaining to the the Illinois State Police's efforts directed at Countering Violent Extremism ("CVE"). In particular, we seek records concerning Illinois State Police's involvement with the Illinois Criminal Justice Authority's ("ICJIA's") Targeted Violence Prevention Program ("TVPP") and development of a "Bystander Gatekeeper Training" program based on a "public health" model. Illinois State Police has been listed as a state partner of the ICJIA-TVPP¹ and was listed as the recipient of a "CVE needs assessment" report written by the ICJIA-TVPP.²

¹ Junaid M. Afeef, *Illinois Targeted Violence Prevention Program*, ILLINOIS CRIMINAL JUSTICE INFORMATION AUTHORITY, <http://www.nemaweb.org/index.php/docman/national-homeland-security-consortium/663-illinois-junaid-afeef-presentation-1/file?force-download>.

² *Engaged Bystander-Gatekeeper Training for Ideologically Inspired Targeted Violence*, ILLINOIS CRIMINAL JUSTICE INFORMATION AUTHORITY, http://www.stopcve.com/uploads/1/1/2/4/112447985/icjia_tvpp_bystander_and_gatekeeper_training_proposal_narrative.pdf.

Records³ requested

We request the following records:

1. Procedures, policies, guidelines, or legal memoranda relating to the Illinois State Police's collection, use, retention, or dissemination of information gathered in the course of investigations, programs, events, or other activities conducted pursuant to the Illinois State Police's partnership with ICJIA-TVPP;
2. Records concerning any events, meetings, conferences, briefings, workshops, and/or trainings attended by Illinois State Police personnel relating to ICJIA-TVPP, "Bystander Gatekeeper Training," "Bystander Gatekeeper Education," "Public Health Interventions," or any other CVE effort in Illinois;
3. Records concerning the training of law enforcement officers, investigators, or any other related law enforcement personnel in Illinois regarding Islam, Muslims, Muslim culture, or South Asian, Arab, and/or any other Muslim community, including but not limited to training materials, guidelines, evaluations, or any other document created or used by Illinois State Police personnel;
4. Records or communications involving ICJIA-TVPP regarding "Bystander Gatekeeper Training," "Bystander Gatekeeper Education," "Public Health Interventions," or any other CVE effort in Illinois;
5. Copies of any and all written agreements between the Illinois State Police and ICJIA-TVPP;
6. Correspondence or any other communications involving Illinois State Police personnel concerning "Bystander Gatekeeper Training," "Bystander Gatekeeper Education," "Public Health Interventions," or any other CVE effort in Illinois;
7. Correspondence or any other communications involving Illinois State Police personnel with representatives of ICJIA-TVPP;
8. Records or communications involving Illinois State Police personnel concerning the development or implementation of CVE programs in Illinois, including but not limited to the City of Chicago, DuPage County and surrounding areas, and the greater Springfield area;

³ For purposes of this request, "Record" means a record in the broadest sense possible, and includes, without limitation, everything tangible, electronic, or digital containing a datum, number, photograph, picture, word, or any other information, including, but not limited to, communications between phones or other electronic devices, e-mails, digital or physical images, video, audio recordings, voicemail messages, social media posts, instructions, directives, guidance documents, formal and informal presentations, training documents, bulletins, notices, alerts, updates, advisories, reports, legal and policy memoranda, contracts, agreements, minutes or notes of meetings and phone calls, and memoranda of understanding. We seek responsive documents within the time period of January 2013 to the date this request is completed.

9. Records or communications involving Illinois State Police personnel concerning CVE training of partner law enforcement officers, investigators, and any other related law enforcement personnel in Illinois, including but not limited to the Chicago Police Department, Illinois Office of Emergency Management and Communications, Cook County Department of Homeland Security and Emergency Management, and Illinois Terrorism Task Force; and
10. Any other records or communications relating to the development and implementation of CVE programs in Illinois, including but not limited to the City of Chicago, DuPage County and surrounding areas, and the greater Springfield area.

Request for waiver of fees

We are prepared to pay reasonable copying costs for reproducing the requested materials, but request that you waive any such fees under the provision of FOIA that authorizes you to waive copying fees when release of requested information is “in the public interest.” In compliance with section 6(b) of the amended FOIA, we represent to you that the documents are sought to determine information concerning the legal rights of the general public and this request is not for the purpose of personal or commercial benefit. Accordingly, a waiver of fees is in the public interest as defined by section 6(b).

If you deny the request for waiver, please notify us before compiling records for which the copying charge will exceed \$50.00 so that we can discuss narrowing the request to cover only the information we seek.

Response requested in five days

Please notify us of your determination of our request and release all responsive records as soon as possible and no later than five working days from the receipt of this request. 5 ILCS 140/3(d). If more than five working days are required to produce the written records, please provide us with a written statement of the reasons for the extension and the date by which the response will be forthcoming. 5 ILCS 140/3(f). Please provide us with copies of responsive records in a searchable and analyzable electronic format where possible. 5 ILCS 140/6(a).

Should any part of this request be denied, please notify us of the denial and provide a written statement of the reasons for the denial, including a detailed factual basis for the application of any exemption, and the names and titles or positions of each person responsible for the denial. 5 ILCS 140/9(a).

If you have any questions concerning this request, you may contact us at juvaria@muslimadvocates.org or at (202) 897-1896.

Very truly yours,

/s/ Juvaria Khan

Juvaria Khan
Muslim Advocates
(202) 897-1896
juvaria@muslimadvocates.org

/s/ Kathy Hunt Muse

Kathy Hunt Muse
ACLU of Illinois
(312) 201-9740 ext. 321
kmuse@aclu-il.org