

December 28, 2017

Director Brian Acken  
Montgomery County Police Records Division  
100 Edison Park Drive  
Gaithersburg, MD 20878

**Re: Maryland Public Information Act Request**

Dear Mr. Acken:

This is a request under the Maryland Public Information Act (“MPIA”), GP § 4-101 *et seq.*, submitted on behalf of Muslim Advocates.

**Background**

Muslim Advocates seeks records pertaining to the Montgomery County Police Department’s (“MCPD”) involvement with efforts to “counter violent extremism.” In particular, we seek records concerning MCPD’s involvement with the Montgomery County Model (“MCM”), which has been characterized as a “public-private partnership” that connects the MCPD with the Montgomery County Executive’s Office of Community Partnerships (“OCP”), its Faith Community Working Group (“FCWG), and the World Organization for Resource Development and Education (“WORDE”).<sup>1</sup>

We also seek records concerning MCPD’s involvement with the efforts of the organization Strong Cities and its parent, Institute for Strategic Dialogue (“ISD”). Strong Cities states that it aims to connect cities and communities through workshops, trainings, and city partnerships to prevent “violent extremism.” Strong Cities’ website lists Montgomery County among its partner cities.<sup>2</sup>

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<sup>1</sup> Dep’t of Justice, FY 2017 PERFORMANCE BUDGET: OFFICE OF COMMUNITY ORIENTED POLICING SERVICES 31 (2017), *available at* <https://www.justice.gov/jmd/file/821491/download>.

<sup>2</sup> *Member Cities*, STRONG CITIES, <http://strongcitiesnetwork.org/strong-cities/member-cities/>.

### **Records<sup>3</sup> Requested**

1. Procedures, policies, guidelines, or legal memoranda relating to MCPD's collection, use, retention, or dissemination of information gathered in the course of investigations, programs, events, and other activities conducted pursuant to the MCM or any other efforts concerning Countering Violent Extremism ("CVE");
2. Records concerning any events, meetings, conferences, briefings, workshops, and/or trainings attended by MCPD personnel relating to Strong Cities, ISD, the MCM, WORDE, or CVE;
3. Records concerning the training for MCPD officers, investigators, and any other related law enforcement personnel regarding Islam, Muslims, Muslim culture, and South Asian, Arab, and any other Muslim community; such records include but are not limited to training materials, guidelines, evaluations, or any other document created or used by MCPD personnel;
4. Records or communications with OCP and/or the FCWG regarding the MCM or any other CVE effort;
5. Copies of any and all written agreements between WORDE and MCPD;
6. Copies of any and all written agreements between Strong Cities and/or ISD and MCPD;
7. Correspondence or any other communications by MCPD personnel concerning Strong Cities, ISD, the MCM, WORDE, or CVE;
8. Correspondence or any other communications by MCPD personnel with representatives of Strong Cities, ISD, or WORDE;

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<sup>3</sup> 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 by MCPD personnel concerning the development or implementation of CVE programs, including but not limited to the MCM in Montgomery County public schools, including universities such as the University of Maryland;
10. Records or communications by MCPD personnel concerning CVE training of School Resource Officers;
11. Records or communications by MCPD personnel concerning the development or implementation of CVE programs, including but not limited to the MCM, in Montgomery County houses of worship, including but not limited to mosques; and
12. Any other records or communications relating to the development and implementation of CVE programs in Montgomery County and/or the Montgomery County Model.

### **Request for Waiver of Fees**

Pursuant to GP§ 4-206(e)(1), Muslim Advocates requests a waiver of all fees for the search, preparation, and reproduction of records responsive to this request. Muslim Advocates is a non-profit civil rights and advocacy organization that focuses on issues of particular relevance to the Muslim community.<sup>4</sup>

Here, the requested records detail the development of CVE programs in Montgomery County and the relationship between Montgomery County, especially the MCPD, and partner organizations working on CVE programs. The value and implementation of such programs are highly debated, especially among parts of the Muslim community. Members of the public residing in Montgomery County—and particularly Montgomery County’s concerned Muslim constituents—have a significant and urgent interest in knowing how the Montgomery County Model for countering violent extremism operates in and affects their communities and their lives. Accordingly, a waiver of all fees arising from this request “would be in the public interest.” GP§ 4-206(e)(2).

### **Response Requested in 30 days**

Please notify us of your determination of our request and release all responsive records as soon as possible and no later than 30 days from the receipt of this request. GP§ 4-203(b). If more than 10 working days are required to produce the written records, please submit a written notification. GP § 4-203(b)(2). Please provide us with copies of responsive records in a searchable and analyzable electronic format where possible. GP § 4-205(c)(1).

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<sup>4</sup> *About*, MUSLIM ADVOCATES, <https://www.muslimadvocates.org/about/>.

Should any part of this request be denied, please immediately notify us of the denial, and provide a written statement of the reasons and legal authority for the denial no later than 10 working days from the receipt of this request. GP § 4-203(b); *Stromberg Metal Works, Inc. v. University of Maryland*, 382 Md. 151, 158-59 (2004). If you elect to deny inspection of any part of the responsive records, please provide the reasons and legal authority for such denial, as well as submitting to us the portions of the records that are available for inspection. GP § 4-203(c)(1)(i)-(ii).

If you have any questions concerning this request, you may contact me at [nimra@muslimadvocates.org](mailto:nimra@muslimadvocates.org) or at (202) 897-2564.

Very truly yours,



Nimra H. Azmi  
Staff Attorney