

March 15, 2018

Houston Police Department
Public Affairs Division
1200 Travis, 21st Floor
Houston, TX 77002

Re: Texas Public Information Act Request

Dear Sir or Madam:

This is a request under the Texas Public Information Act (“PIA”)¹ on behalf of our client, Muslim Advocates, for records pertaining to the Houston Police Department’s (“HPD”) collaboration with state and/or federal law enforcement regarding counterterrorism investigations and intelligence operations.

Background

Following the attacks of September 11, 2001, state and local law enforcement agencies assumed new counterterrorism responsibilities in addition to their traditional roles of investigating crimes and patrolling neighborhoods. Law enforcement agencies in virtually every major jurisdiction across the country now engage in a range of counterterrorism efforts designed to prepare for and foil terrorist attacks; these agencies have also increased their coordination and collaboration with their federal counterparts through fusion centers, task forces, and similar entities. In light of recent events suggesting possible increased surveillance of Muslim communities by various law enforcement agencies in the context of counterterrorism efforts, Muslim Advocates seeks information from the HPD.

Request

We hereby request the following records under the PIA:

- All memoranda of understanding, contracts, policy manuals, or executed agreements between the HPD and the Houston Regional Intelligence Service Center and/or the Texas Joint Crime Information Center.

¹ Tex. Gov’t Code §§ 552.001 *et seq.*

- All documents, procedures, training materials, charts, statistics, reports, and audits provided to the HPD by the Houston Regional Intelligence Service Center and/or the Texas Joint Crime Information Center relating to:²
 - “Violent extremism” or “countering violent extremism.”
 - “Islam,” “radical Islam,” radical Islamic terrorism,” “sharia,” or “jihad.”
 - Counterterrorism investigations and intelligence operations.
- All documents, procedures, training materials, charts, statistics, and reports displayed or provided by the HPD or its agents, employees, consultants, representatives, or independent contractors that refer or relate to “violent extremism” or “countering violent extremism.” We request only copies of materials shown, presented, displayed or provided since January 1, 2016.
- All training materials shown, presented, displayed or provided by the HPD or its agents, employees, consultants, representatives or independent contractors to HPD personnel that refer or relate to the Muslim community, Islam, “radical Islam,” radical Islamic terrorism,” “sharia,” or “jihad”. We request only copies of materials shown, presented, displayed or provided since January 1, 2016.

Response Within Ten Business Days

Consistent with the PIA, we ask that you make a determination promptly upon, and namely within 10 days of, receiving this request of the records in your possession that are responsive to the request and also determine whether the documents are subject to disclosure.³ Please promptly notify us of the determination and the reasons thereof.⁴ To the extent that your department chooses to withhold any record, please list, in writing, each and every document that is withheld as well as the reasons for doing so.⁵ For those documents subject to disclosure, please provide an approximate date of delivery.⁶ Should a part of any document contain information that is exempt from disclosure, please segregate and provide the non-exempt portion of the document.⁷ We also request that you provide us with the documents in electronic format where possible. We further request any available cost waiver, and agree to pay only the direct costs of duplication up to \$100.

² The words “relating to” should be interpreted to encompass the terms “containing information about, reflecting, identifying, mentioning, referring to, or summarizing.”

³ Tex. Gov’t Code § 552.221.

⁴ *See id.*

⁵ Tex. Gov’t Code § 552.301.

⁶ *See* Tex. Gov’t Code § 552.221.

⁷ *See* Tex. Gov’t Code § 552.302.

Should you have questions concerning this request, please contact Ahsan Shaikh by telephone at (650) 815-7506 or via e-mail at ashaikh@mwe.com. Thank you for your attention and I look forward to hearing from your office.

Very truly yours,

Ahsan A. Shaikh

Ahsan A. Shaikh
Partner

Elizabeth P. Lewis

Elizabeth Lewis
Partner, Pro Bono & Community Service