

McDermott Will&Emery

Boston Brussels Chicago Dallas Düsseldorf Frankfurt Houston London Los Angeles Miami
Milan Munich New York Orange County Paris Seoul Silicon Valley Washington, D.C.

Strategic alliance with MWE China Law Offices (Shanghai)

March 15, 2018

Jim McDonnell, Sheriff
Los Angeles County Sheriff's Department
211 West Temple Street
Los Angeles, California 90012

Re: California Public Records Request

Dear Mr. McDonnell:

This is a request under the California Public Records Act (“PRA”)¹ on behalf of our client, Muslim Advocates, for records pertaining to Los Angeles County’s 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 Los Angeles County.

Request

We hereby request the following records under the PRA:

- All memoranda of understanding, contracts, policy manuals, or executed agreements between Los Angeles County and the Los Angeles Joint Regional Intelligence Center and/or the California State Threat Assessment Center.

¹ CAL. GOV’T CODE §§ 6250 *et seq.* (West 2011).

- All documents, procedures, training materials, charts, statistics, reports, and audits provided to Los Angeles County by the Los Angeles Joint Regional Intelligence Center and/or the California State Threat Assessment Center relating to:²
 - 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 Los Angeles County or its agents, employees, consultants, representatives, or independent contractors that refer or relate to 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 Los Angeles County or its agents, employees, consultants, representatives or independent contractors to Los Angeles County 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 PRA, we ask that you make a determination 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.

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.

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

³ See CAL. GOV’T CODE § 6253(c) (West 2011).

⁴ See *id.*

⁵ See *id.* § 6255.

⁶ See *id.* § 6253(c).

⁷ See *id.* § 6253(a).

Very truly yours,

Ahsan A. Shaikh

Ahsan A. Shaikh

Partner

Elizabeth P. J.

Elizabeth Lewis

Partner, Pro Bono & Community Service

DM_US 89617819-1.099903.0011