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Pinal County Sheriff's Office (AZ)  
Sheriff Mark Lamb  
971 Jason Lopez Circle, Building C  
Florence, AZ 85132

To Whom It May Concern:

Under the Arizona Public Records Law § 39.101 *et seq.*, Muslim Advocates is requesting an opportunity to inspect or obtain copies of public records that are in the possession of the Pinal County Sheriff's Office ("PCSO"). As outlined below, the records we request concern John Guandolo and his "Understanding the Threat" ("UTT") consulting group.

Mr. Guandolo and his associates at UTT have a long, well-documented history of spreading anti-Muslim sentiment through public comments and private law enforcement trainings. For close to a decade, Mr. Guandolo has toured the country claiming during public appearances, presentations, and internet posts that a vast conspiracy exists among Muslim groups to "overthrow America and establish Islamic law."<sup>1</sup> Through this inflammatory rhetoric, Mr. Guandolo has sought to inculcate anti-Muslim prejudice among local law enforcement authorities and communities at large, declaring, for example, that:

- All U.S.-based Muslim organizations "share the same ideology as ISIS"<sup>2</sup>;
- That Muslim Student Associations at colleges and universities around the country are "points of recruitment in America for the Muslim Brotherhood and jihad"<sup>3</sup>;

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<sup>1</sup> Brian Mosely, *Islamic subversion alleged by speaker*, Shelbyville Times-Gazette (Feb. 17, 2009), <http://www.t-g.com/story/1502537.html>.

<sup>2</sup> Miranda Blue, *John Guandolo: Obama Committing 'Treason' By Working With US Muslim Groups With The 'Same Ideology As ISIS'*, Right Wing Watch (Dec. 11, 2015), <http://www.rightwingwatch.org/post/john-guandolo-obama-committing-treason-by-working-with-us-muslim-groups-with-the-same-ideology-as-isis/>.

<sup>3</sup> Christopher Holton, *HOLTON: The Muslim Brotherhood Is Flexing Its Muscles At LSU*, The Hayride (Sept. 11, 2013), <http://thehayride.com/2013/09/holton-the-muslim-brotherhood-is-flexing-its-muscles-at-lsu/>.

- That Muslims “do not have a First Amendment right to do anything,”<sup>4</sup> and that mosques should “not [be] afforded the same legal rights” as churches<sup>5</sup>;
- That mosques in the U.S. are akin to foreign military bases on American soil,<sup>6</sup> and that the vast majority of mosques in the country should be shut down and their leaders arrested<sup>7</sup>;
- And in recent months, Mr. Guandolo has repeatedly claimed—without evidence and despite FBI conclusions to the contrary<sup>8</sup>—that the October 2017 Las Vegas massacre that killed nearly 60 people and injured hundreds more was “a jihadi operation.”<sup>9</sup>

Despite Mr. Guandolo’s consistent anti-Muslim views, the Pinal County Sheriff’s Office invited him to host a three-day training on “Understanding and Investigating the Jihadi Network” in the U.S. in March 2016.<sup>10</sup> Reports noted that PSCO paid for the event with more than \$10,000 in its RICO funds, funds that come “from assets seized during the course of law-enforcement actions.”<sup>11</sup> Given all of these factors, the public has a keen interest in knowing the full extent of any interactions that have occurred between Pinal County officials—particularly those involved in law enforcement—and Mr. Guandolo, including UTT and additional individuals associated therewith.

We are seeking the following records<sup>12</sup> in the possession of the PCSO that concern John Guandolo and his UTT consulting group, including but not limited to the training planned for and/or conducted by UTT from March 14 to 17, 2016 (the “Training”). Specifically:

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<sup>4</sup> Bob Smietana and Tony Gonzalez, *Sheriff hires mosque foe to lead terrorism training*, USA Today (Feb. 15, 2012), <http://usatoday30.usatoday.com/news/nation/story/2012-02-15/terrorism-training-tennessee/53102430/1>.

<sup>5</sup> Miranda Blue, *John Guandolo Tells Members Of Congress U.S. Mosques Shouldn’t Be ‘Afforded The Same Legal Rights’ As Churches*, Right Wing Watch (Nov. 15, 2017), <http://www.rightwingwatch.org/post/john-guandolo-tells-members-of-congress-u-s-mosques-shouldnt-be-afforded-the-same-legal-rights-as-churches/>.

<sup>6</sup> *Id.*

<sup>7</sup> Brian Tashman, *John Guandolo: Close The Majority Of Mosques In America*, Right Wing Watch (Apr. 4, 2016), <http://www.rightwingwatch.org/post/john-guandolo-close-the-majority-of-mosques-in-america/>.

<sup>8</sup> Associated Press, *FBI: Las Vegas shooter had no connection to ISIS*, N.Y. Post (Oct. 2, 2017), <https://nypost.com/2017/10/02/fbi-las-vegas-shooter-had-no-connection-to-terror-groups/>.

<sup>9</sup> *Anti-Muslim company’s bombing tweet the latest in a series of erratic statements and behaviors*, Southern Poverty Law Center (Nov. 1, 2017), <https://www.splcenter.org/hatewatch/2017/11/01/anti-muslim-company%E2%80%99s-bombing-tweet-latest-series-erratic-statements-and-behaviors>.

<sup>10</sup> *John Guandolo invited by Pinal County sheriff to give training*, Imagine 2050, <http://imagine2050.newcomm.org/timelines/john-guandolo-invited-pinal-county-sheriff-give-training/> (last visited Mar. 15, 2018).

<sup>11</sup> Stephen Lemons, *Paul Babeu Spent RICO Funds on Training by Notorious Islamophobe John Guandolo*, Phoenix New Times (Aug. 18, 2016), [www.phoenixnewtimes.com/news/paul-babeu-spent-rico-funds-on-training-by-notorious-islamophobe-john-guandolo-8553942](http://www.phoenixnewtimes.com/news/paul-babeu-spent-rico-funds-on-training-by-notorious-islamophobe-john-guandolo-8553942).

<sup>12</sup> The term “records” is intended in the broadest possible sense and includes without limitation all records or communications preserved in electronic or written form, including but not limited to correspondence, regulations, directives, documents, data, videotapes, audiotapes, e-mails, faxes, files, guidance, guidelines,

1. All billing records, communications, and documents relating to the Training. This request includes records concerning all public monies spent on any aspect of the Training, including but not limited to payments for travel, food, entertainment, phone, Training-related materials, trainer fees, and all other expenses or costs attributable to any aspect of the Training, its speakers, or attendees.
2. All training materials presented and used during the Training, including but not limited to documents, agendas, lesson plans, power points, hand-outs, books, articles, and recordings or transcripts of the Training itself.
3. All complaints PCSO received in response to the Training, including but not limited to complaints from any member of the public, organizations (such as faith or advocacy groups), or by internal PCSO staff or employees, either before or after the date of the Training.
4. All communications between PCSO staff and persons responsible for presenting, inviting, or hosting the Training, including but not limited their communications with John Guandolo or any UTT staff, employee, or agent. These communications include, but are not limited to, letters, emails, memos, notes, and others forms of written or electronic correspondence.
5. All documents concerning the implementation of techniques presented at the Training, along with any internal assessments by the PCSO as to the adequacy of the Training.
6. All documents concerning the attendance of PCSO personnel at the Training or at any of John Guandolo's previous trainings held on other dates or at other locations.
7. All records of communications between the PCSO and other government agencies or law enforcement personnel regarding John Guandolo and his trainings, including discussions about any of John Guandolo's previous trainings held on other dates or at other locations.

The public has an inherent right to be reasonably informed as to what public records contain and the manner in which public bodies conduct their affairs and operations. If an exemption is discretionary, we ask you not to withhold such records, even if they would qualify under the law. If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law. Any records that fall under any exemption should be segregated or redacted in part so that the public can reasonably view the remainder of the requested record. We reserve the right to appeal any decision to withhold any information.

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standards, evaluations, instructions, analyses, legal and policy memoranda, minutes or notes of meetings and phone calls, memoranda, agreements, notes, orders, policies, procedures, protocols, reports, rules, manuals, technical specifications, text communications between phones or other electronic devices (including, but not limited to, communications sent via SMS or other text, Blackberry Messenger, iMessage, WhatsApp, Signal, Gchat, or Twitter direct message), training materials or studies, including records kept in written form, or electronic format on computers and/or other electronic storage devices, electronic communications and/or videotapes, as well as any reproductions thereof that differ in any way from any other reproduction, such as copies containing marginal notations. No category of material should be omitted from search, collection, and production.



Further, if your agency does not maintain these records, please provide us with the name and address of the custodian or agency that does.

We request a waiver of all fees as disclosure of the requested information is in the public interest and is not being sought for any commercial purpose. However, if there are any fees for searching or copying these records, please inform me of the costs before processing this request.

Please respond to this request in a reasonable time period. If access to the records I am requesting will take longer, please contact me with information about when I might expect copies or the ability to inspect the requested records. We will accept documents on a rolling basis.

Thank you for considering this request. Please contact me by phone at 202-897-1896 or by e-mail at [juvaria@muslimadvocates.org](mailto:juvaria@muslimadvocates.org) if you have any questions.

Sincerely,

Juvaria Khan  
Staff Attorney  
Muslim Advocates