

March 20, 2018

VIA FEDERAL EXPRESS

Custodian of Records
Saint Paul Police Department
367 Grove Street
Saint Paul, MN 55101

Re: Government Data Practices Act Request

Dear Sir or Madam:

This is a request under the Minnesota Government Data Practices Act (“the Act”)¹ on behalf of our client, Muslim Advocates, for records pertaining to the St. Paul Police Department’s (“SPPD”) 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 SPPD.

Request

We hereby request the following records under the Act:

- All memoranda of understanding, contracts, policy manuals, or executed agreements between the SPPD and the Minnesota Fusion Center and/or the Minnesota Joint Analytical Center.

¹ Minn. Stat. §§ 13.01 *et. seq.*

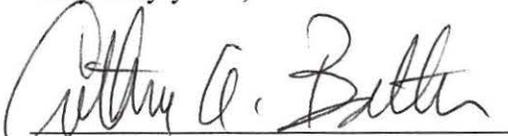
- All documents, procedures, training materials, charts, statistics, reports, and audits provided to the SPPD by the Minnesota Fusion Center and/or the Minnesota Joint Analytical Center relating to:
 - “Violent extremism” or “countering violent extremism.”
 - “Islam,” “radical Islam,” radical Islamic terrorism,” “sharia,” or “jihad.”
 - Counterterrorism investigations and intelligence operations.
- All documents, procedures, training materials, charts, statistics, and reports displayed or provided by the SPPD 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 SPPD or its agents, employees, consultants, representatives or independent contractors to SPPD 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

We request 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. Please promptly notify us of the determination and the reasons thereof. 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. For those documents subject to disclosure, please provide an approximate date of delivery. Should a part of any document contain information that is exempt from disclosure, please segregate and provide the non-exempt portion of the document. 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 Catherine Battin by telephone at (312) 984-3233 or via e-mail at cbattin@mwe.com. Thank you for your attention and I look forward to hearing from your office.

Very truly yours,



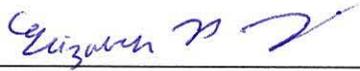
Catherine A. Battin

Partner

St. Paul Police Department

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Elizabeth Lewis

Partner, Pro Bono & Community Service

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