



May 29, 2018

VIA CERTIFIED MAIL

Robert Ciccia
Assistant General Counsel and Records Access Officer
Executive Office of Health and Human Services
One Ashburton Place, 11th Floor
Boston, MA 02108

Dear Mr. Ciccia:

Pursuant to the Massachusetts Public Records Law, M.G.L. c.66, §10, Muslim Justice League, by and through their attorneys, Muslim Advocates, seeks records concerning the Promoting Engagement, Acceptance and Community Empowerment Project (“PEACE Project”), dating from December 1, 2016 until the date of this request.

I. Background

The Massachusetts Executive Office of Health and Human Services (“EOHHS”) has characterized the PEACE Project as aiming to use a “public health approach” to prevent “violence and extremism, including prevention of crimes motivated by prejudice.”¹ Part of Countering Violent Extremism (“CVE”) efforts, the PEACE Project is supported by a “Cooperative Agreement” with the U.S. Attorney’s Office for the District of Massachusetts (“USAO-MA”).² PEACE Project funds are stated to “support social networks that promote inclusiveness of all cultural and social groups, adoption of healthy behaviors, greater access to health services, raising awareness of human rights, promoting self-esteem and mutual respect, integration of cultural identity, employment opportunity and access to democratic means for negotiating needs and opinions.”³ The 2016 grantees of the PEACE Project (Somali Development Center, United Somali Youth, and Empower Peace) (hereinafter known as the “PEACE Project Grantees”) largely target Boston’s Somali community, with 80% of the 2016 PEACE Project grant monies aimed at the Somali community.⁴

¹ Press Release, Executive Office of Health and Human Services, “Three Boston-based Organizations Chosen for 210K in PEACE Project Grants” (Dec. 1, 2016), <http://www.mass.gov/eohhs/gov/newsroom/press-releases/eohhs/three-boston-based-orgs-chosen-for-210k-in-peace-grants.html>.

² *Id.*

³ *Id.*

⁴ *Id.*



II. Records Requested

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 December 1, 2016 to the date this request is completed.

Muslim Justice League seeks:

1. All records of progress reports and updates from PEACE Project grantees, including notes of verbal conversations, emails, formal grant reports or other records existing in electronic or hard copy;
2. All records related to meetings of the PEACE Project Grantees hosted by EOHHS on January 25, 2017, April 27, 2017, and September 7, 2017;
3. All records regarding EOHHS site visits to PEACE Project Grantees in March 2017 and August 2017;
4. All university evaluations of PEACE Project grantees and all records of all related discussions with universities, including but not limited to EOHHS meetings with:
 - a. Boston University and/or Boston College in April 2017;
 - b. Harvard School of Public Health in August 2017; and
 - c. Boston College in August 2017;
5. All records related to an April 2017, meeting between EOHHS, the Massachusetts Department of Mental Health (“DMH”), and USAO-MA;
6. All records related to the PEACE Project “Cooperative Agreement” between the USAO-MA and EOHHS;

7. All records related to a “Community Awareness Briefing on Violent Extremism in the United States Train-the-Presenter (TTP) Program” hosted by USAO-MA in July 2017, in which an EOHHS representative was a panelist;
8. All records regarding a July 2017, meeting between EOHHS, DMH, USAO-MA, and Dr. Ronald Schouten;
9. All records regarding an August 2017 conference call between EOHHS, the Massachusetts Office of Grants Management and Research, Department of Corrections, USAO-MA, and the National Governors Association; and
10. All records regarding a “CVE stakeholder meeting” in September 2015, with EOHHS, USAO-MA, DMH, Massachusetts Department of Public Health, Massachusetts Department of Early Education and Care, Boston Public Schools, and Boston Children’s Hospital.

This request involves the development and implementation of CVE programs in Boston, a matter of longtime and widespread public concern, particularly to Boston’s Muslim and Somali communities.¹ These records will contribute to a concerned public’s understanding of EOHHS, USAO-MA, and the PEACE Project’s aims and operations, particularly within the Somali and Muslim communities. Moreover, this request is submitted on behalf of nonprofit organizations who do not have a commercial interest in the matter.

Muslim Justice League is a nonprofit §501(c)(3) organization that educates, organizes and advocates for human and civil rights that are violated or threatened under national security pretexts. The requested documents will be made available to the general public.

In light of the evident public interest and the requestor’s lack of commercial interest, we ask that you waive any fees associated with this request pursuant to M.G.L. c.66, § 10(b)(v).

If you decide not to waive fees, we ask that you permit us to examine, at our election, the responsive documents before deciding which portions to copy. Moreover, we ask that two

¹ See, e.g., Philip Marcelo, *THE MORNING JOURNAL*, *Anti-extremism efforts falter 5 years after Boston bombing* (April 12, 2018), <http://www.morningjournal.com/general-news/20180412/anti-extremism-efforts-falter-5-years-after-boston-bombing>; Shelley Murphy, *THE BOSTON GLOBE*, *Boston to host anti-extremist pilot program* (Sept. 24, 2014); Waqas Mirza, *MUCKROCK*, *Boston finds Muslim surveillance program “flawed and problematic” but implements it anyway* (May 13, 2016), <https://www.muckrock.com/news/archives/2016/may/13/boston-cve/>.

estimates of fees be provided: (1) an estimation of fees to produce the documents numbered in points 1–10 above; and (2) an estimation of fees to produce all emails and attachments, sent or received on or after December 1, 2016 to the present, related to the PEACE Project.

Should you determine that some portion of the requested documents are exempt from disclosure, please release any reasonably segregable non-exempt portions. M.G.L. c.66, § 10(a). In addition, please note the applicable statutory exemption and explain why it applies to the redacted portions.

We anticipate compliance this request within the statutorily appointed ten (10) days. M.G.L. c.66, § 10(a). We request responsive documents in searchable, electronic format. If you have questions about this request, you may contact Nimra Azmi at (202) 897-2564 or nimra@muslimadvocates.org. We look forward to your response.

Very truly yours,

Nimra H. Azmi
Muslim Advocates

Shannon Al-Wakeel
Muslim Justice League