

From: [Voris, Dane](#)
To: [Gershenson, Adam](#); [Evensen, Hanna](#); [Rachel Levinson-Waldman](#); [Jose Gutierrez](#)
Subject: FW: Public Records Request B00169-01320
Date: Tuesday, January 10, 2023 9:32:26 PM
Attachments: [YVSF Form 26s Produced in CW v. Dilworth for Brennan Center Redacted.pdf](#)

Team – Passing along an email and attachment I received this evening from BPD. I have not had a chance to review yet.

As a heads up, I will be OOO for some vacation tomorrow through 1/17. Perhaps we can connect to discuss this response when I return next week.

Best,
Dane

Dane Voris

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From: Teresa Anderson <teresa.anderson@pd.boston.gov>
Sent: Tuesday, January 10, 2023 8:37 PM
To: Voris, Dane <dvoris@cooley.com>
Cc: Joseph McClellan <joseph.mcclellan@pd.boston.gov>; Jess Megee <james.megee@pd.boston.gov>
Subject: RE: Public Records Request B00169-01320

[External]

Attorney Voris,

I understand the Brennan Center anticipated receiving the Boston Police Department's responses to its questions today. We continue to work on comprehensive responses, and I'm hopeful we will be able to provide these responses by the end of the week.

In the meantime, the following is provided for your review.

First, in response to your request for a "hit count," the relevant databases were searched for the following terms in June 2020:

- Twitter: 27
- Facebook: 127
- Instagram: 19
- SnapChat: 14
- TikTok: 1

- Telegram: 0
- Parler: 0
- Gab: 0

Additionally, main BRIC email address (bric@pd.boston.gov) was searched for these terms in June 2020, and yielded the following number of emails:

- Twitter: 636
- Facebook: 447
- Instagram: 144
- SnapChat: 46
- TikTok: 11
- Telegram: 68
- Parler: 0
- Gab: 7

It may be helpful to schedule a time to discuss these results, and I can provide some additional information and context regarding the relevant databases and the general uses for the BRIC email address.

Lastly, in *Commonwealth v. Dilworth*, Suffolk Sup. Ct. Docket Nos. 1884CR000453 and 1884CR00469, Judge Ullmann ordered BPD to produce “all Form 26 reports prepared by any officer or other employee of the Boston Police Department between August 1, 2017 and July 31, 2018 that reference the use of Snapchat as an investigative tool in any case in which the subject of Snapchat monitoring has been charged with any offense related to that monitoring. Documents related to human trafficking investigations, sexual assault investigations and murder investigations will not be covered by the summons.” While this set of documents may not be responsive to a specific question or request the Brennan Center has made to date, nonetheless, they may be helpful. Attached please find a redacted pdf of the documents that were produced in the *Dilworth* case.

I will be in touch at the end of the week. If you have any questions or concerns, please do not hesitate to give me a call.

Thanks,
Teresa

Teresa K. Anderson
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On Dec 21, 2022 at 12:50:26 PM, "Voriss, Dane" <dvorris@cooley.com> wrote:

Joe –

In light of the upcoming holidays, the Brennan Center is amenable to an extension to January 10, 2023. Please note, however, that we are disappointed with the progress being made on these requests, which we provided seven weeks ago and which reflected a compromise on our part in lieu of a near-term search for responsive documents. The Brennan Center's public-records request is now nearly two years old, and we trust that BPD will use this additional time to prepare complete responses to each of our questions.

The Brennan Center reserves all rights.

Best,
Dane

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From: Joseph McClellan <joseph.mcclellan@pd.boston.gov>

Sent: Wednesday, December 21, 2022 11:16 AM

To: Voris, Dane <dvoris@cooley.com>

Cc: Teresa Anderson <teresa.anderson@pd.boston.gov>

Subject: Re: Public Records Request B00169-01320

[External]

Dane,

We anticipate sending our entire response to all 23 questions in one document after the proposed extension.

-

Joe

On Wed, Dec 21, 2022 at 11:12 AM Voris, Dane <dvoris@cooley.com> wrote:

Joe –

Thank you for the quick response. I'll need to check with my client on this, but one question before I do: Only 6 of the 23 written questions in our November 2 letter are addressed to BRIC. Does that mean we can expect answers to the 17 non-BRIC questions sooner? If we can guarantee delivery of the bulk of BPD's answers in the short term, that would be very helpful.

Thank you,
Dane

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From: Joseph McClellan <joseph.mcclellan@pd.boston.gov>

Sent: Wednesday, December 21, 2022 9:54 AM

To: Voris, Dane <dvoris@cooley.com>

Cc: Teresa Anderson <teresa.anderson@pd.boston.gov>

Subject: Re: Public Records Request B00169-01320

[External]

Dane,

I reached out to the attorney assigned to the BRIC who is working on this, and they requested an extension of thirty days. Are you amenable to granting the extension and aiming for a mid-January target? I am optimistic the Department can complete the assignment by then and will not request any additional time.

Happy holidays to you and your family as well.

Best,
Joe

On Tue, Dec 20, 2022 at 11:14 AM Voris, Dane <dvoris@cooley.com> wrote:

Hi Joe –

I hope you are well. Just following up on this response given the mid-December ETA.

Wishing you and yours a happy holidays,
Dane

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From: Voris, Dane
Sent: Tuesday, November 29, 2022 1:35 PM
To: Joseph McClellan <joseph.mcclellan@pd.boston.gov>
Subject: RE: Public Records Request B00169-01320

Thanks, Joe. Yes, mid-December works for us. We looking forward to receiving your response.

Best,
Dane

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From: Joseph McClellan <joseph.mcclellan@pd.boston.gov>
Sent: Tuesday, November 29, 2022 10:39 AM
To: Voris, Dane <dvoris@cooley.com>
Subject: Re: Public Records Request B00169-01320

[External]

Hello,

I did, hope you had an enjoyable holiday as well. The BRIC has recently been busy with a city council hearing regarding the surveillance ordinance, but we are currently working through the questions as we speak. Does a mid-December deadline (give or take a few days around the 15th) sound reasonable?

Best,
Joe

On Tue, Nov 29, 2022 at 10:30 AM Voris, Dane <dvoris@cooley.com> wrote:

Joe –

I hope you had a great holiday weekend. I'm just following up on the Brennan Center written questions. Could you please provide an ETA for BPD's response?

Best,
Dane

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From: Joseph McClellan <joseph.mcclellan@pd.boston.gov>
Sent: Tuesday, November 8, 2022 9:03 AM
To: Voris, Dane <dvoris@cooley.com>
Subject: Re: Public Records Request B00169-01320

[External]

Thank you, I will disseminate this to our attorney in the BRIC and provide a formal detail response soon.

Best,
Joe

On Wed, Nov 2, 2022 at 3:25 PM Voris, Dane <dvoris@cooley.com> wrote:

Joe –

Attached please find the Brennan Center’s written questions to BPD concerning the issues raised in the above-referenced public records request. We look forward to your response.

Best,
Dane

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