

BRENNAN
CENTER
FOR JUSTICE

Brennan Center for Justice
at New York University School of Law

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December 23, 2014

Via Certified Mail

Custodian of Records
Saint Paul Police Department
367 Grove Street
Saint Paul, MN 55101
(651) 266-5700

Re: Minnesota Government Data Practices Act

Dear Sir or Madam:

This is a request under the Minnesota Government Data Practices Act (“GDPA”), Minn. Stat. § 13 (2011), *et seq.*, on behalf of the Brennan Center for Justice at NYU School of Law.

Background

The Brennan Center seeks records pertaining to a new program aimed at “countering violent extremism” (CVE). On April 15, 2014, a senior White House official announced a CVE envoy program designed to “coordinat[e] government engagement on the threat of homegrown violent extremism.”¹ And on September 15, 2014, Attorney General Eric Holder announced the creation of a CVE “pilot” program to begin in three cities,² one of which is Saint Paul.³

¹ Remarks by Assistant to the President for Homeland Security and Counterterrorism Lisa O. Monaco, Countering Violent Extremism and the Power of Community, Apr. 15, 2014 [hereinafter Monaco Speech], available at <http://www.whitehouse.gov/the-press-office/2014/04/16/remarks-assistant-president-homeland-security-and-counterterrorism-lisa->.

² See Press Release, Department of Justice, Attorney General Holder Announces Pilot Program to Counter Violent Extremists, Sept. 15, 2014, available at <http://www.justice.gov/opa/pr/attorney-general-holder-announces-pilot-program-counter-violent-extremists> [Holder Press Release].

³ Amy Forliti, *Minneapolis-St. Paul 1 site of anti-terror program*, ASSOCIATED PRESS (Sept. 17, 2014, 12:41 AM), <http://bigstory.ap.org/article/doj-extremism-fight-could-take-cue-minnesota>; Brian Bennett, Joel Rubin & Victoria Kim, *L.A. chosen for pilot program on dissuading militant recruits*, L.A. TIMES (Sept. 22, 2014, 7:28 PM), <http://www.latimes.com/local/la-me-terror-jihad-program-20140923-story.html>; Shelley Murphy, *Boston to host anti-extremist pilot program*, BOSTON GLOBE (Sept. 24, 2014), <http://www.bostonglobe.com/metro/2014/09/23/boston-site->

The Brennan Center is requesting information on the rules governing the involvement of the Saint Paul Police Department in these CVE programs.

Request

The Brennan Center specifically requests all information⁴ relating to⁵:

1. All policies, procedures, and directives referencing the Saint Paul Police Department's participation in CVE programs, including:
 - a. Documents referring to the envoy program.⁶
 - b. Documents referring to the pilot programs announced by Attorney General Eric Holder in his September 2014 press release.⁷
 - c. Any other documents referring to CVE programs in Saint Paul.

2. All Memorandums of Understanding with outside agencies applicable to the Saint Paul Police Department's participation in CVE programs, including:
 - a. Documents referring to the envoy program.⁸
 - b. Documents referring to the pilot programs announced by Attorney General Eric Holder in his September 2014 press release.⁹
 - c. Documents referring to CVE programs in:
 - i. Minneapolis
 - ii. Saint Paul
 - iii. Los Angeles
 - iv. Boston

Response Within A Reasonable Time

Consistent with the GDPR, we ask that you release the responsive information promptly. Please provide the date, within a reasonable time, when the information will be available.¹⁰ To the extent that your Department chooses to withhold any information based on one or more of the exceptions under the GDPR, please provide notice and a copy of the decision request to the Brennan Center within a reasonable time.¹¹ Should a

[program-prevent-residents-from-joining-extremist-groups/YpEpg2cYvITZ6u8AFkbarL/story.html](https://www.brennancenter.org/program-prevent-residents-from-joining-extremist-groups/YpEpg2cYvITZ6u8AFkbarL/story.html).

⁴ The word "information" as used in this request encompasses all "government data" as defined in Minn. Stat. § 13.02(7) (2011).

⁵ The words "relating to" should be interpreted to encompass the terms "containing information about, reflecting, identifying, mentioning, referring to, or summarizing."

⁶ Monaco Speech, *supra* note 1.

⁷ Holder Press Release, *supra* note 2.

⁸ Monaco Speech, *supra* note 1.

⁹ Holder Press Release, *supra* note 2.

¹⁰ Minn. Stat. § 13.03(2) (2011).

¹¹ Minn. Stat. § 13.03(3)(f) (2011).

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.

Should you have any questions concerning this request, please contact Shannon Parker by telephone at (646) 292 – 8363 or via e-mail at shannon.parker@nyu.edu.

Sincerely,



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