

August 5th, 2020

BY EMAIL: ClerkFOIA@cityofchicago.org

Office of the Chicago City Clerk
City Hall
121 North LaSalle Street
Room 107
Chicago, IL 60602

Re: Freedom of Information Act Request

Dear Sir/Madam:

Citizens for Responsibility and Ethics in Washington (“CREW”) makes this request for records pursuant to the Freedom of Information Act (“FOIA”), 5 ILCS 140.

Specifically, CREW requests:

All communications from May 25, 2020 to the present concerning the City of Chicago’s response to public gatherings and protests related to the death of George Floyd, the Black Lives Matter movement, or the killing of black individuals by police officers. This request includes without limitation the following records as they relate to the City of Chicago’s protest response efforts:

1. All communications that describe policy, tactics, procedures, and equipment to be used by law enforcement officers.
2. All records of disciplining law enforcement officers for misconduct.
3. All records related to the total budget and cost for law enforcement officer response, including the cost of riot gear.
4. All communications related to the consideration of deploying the national guard.
5. All records of consideration or implementation of new policies for police procedures when responding to incidents and arrests of civilians and when engaging with public gatherings and protests.
6. All communications regarding protest activity involving federal officers, including but not limited to: Department of Homeland Security (DHS), U.S. Customs and Border Protection (CBP), and U.S. Immigration and Customs Enforcement (ICE).

This request includes but is not limited to communications within the City of Chicago, as well as communications with the Chicago Police Department, Chicago Fraternal Order of Police, Chicago Office of the Mayor, Chicago Police Board, Chicago Civilian Office of Police Accountability, Cook County Sheriff’s Department, Illinois Office of the Attorney General, Office of the Governor of Illinois, and the Federal Government.

Please search for responsive records regardless of format, medium, or physical characteristics. We seek records of any kind, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical material. Our request includes without limitation all correspondence, letters, emails, text messages, facsimiles, telephone messages, voice mail messages, and transcripts, notes, or minutes of any meetings, telephone conversations, or discussions. Our request also includes any attachments to emails and other records, as well as those who were cc'ed or bcc'ed on any emails.

If it is your position any portion of the requested records is exempt from disclosure, please cite each specific exemption you feel justifies the refusal to release the information and notify CREW of the appeal procedures available under the law. CREW requests that you state in writing and with particularity the reasons for any conclusion that a record is exempt or confidential. If some portions of the requested records are properly exempt from disclosure, you are required to redact those portions and produce the remainder of the requested records.

The murder of George Floyd on May 25, 2020 by a Minnesota police officer sparked nationwide protests that have been met with police violence against peaceful protestors.¹ Nearly 400 complaints have been filed against the Chicago Police Department in the wake of recent protests for excessive force and civil rights violations.² Many of the complaints include violence used against peaceful protestors, some of which resulted in injuries and hospitalizations.³ The requested records would provide a clearer picture of what instruction officers received in how to respond to protestors and if violent tactics were encouraged or authorized.⁴

CREW is a non-profit corporation, organized under section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the public's right to be aware of the activities of government officials, to ensuring the integrity of those officials, and to highlighting and reducing the influence of money on politics. CREW intends to analyze the information responsive to this request and to share its analysis with the public. The release of information obtained through this request is not in CREW's financial interest.

If there are any fees for searching or copying these records, please inform CREW if the cost will exceed \$100. However, CREW also requests a waiver of all fees because the disclosure of the requested information is in the public interest. The public is entitled to information concerning the City of Chicago's response to public gatherings and protests related to the Black Lives Matter movement and surrounding the death of black individuals by police officers. Further, this information is not being sought for

¹ Adam Gabbatt, [Protests About Police Brutality Are Met With Wave Of Police Brutality Across US](https://www.theguardian.com/us-news/2020/jun/06/police-violence-protests-us-george-floyd), *The Guardian*, June 6, 2020, available at

<https://www.theguardian.com/us-news/2020/jun/06/police-violence-protests-us-george-floyd>

² <https://news.wttw.com/2020/06/29/371-complaints-lodged-about-chicago-police-response-protests>

³

<https://chicago.suntimes.com/news/2020/6/1/21277429/chicago-protests-george-floyd-black-lives-matter-police-misconduct-lightfoot-brown>

⁴ Joel Rubin, LAPD Violence Against George Floyd Protests Erodes A Decade of Reforms, *Los Angeles Times*, June 14, 2020, available at

<https://www.latimes.com/california/story/2020-06-14/lapd-protest-history-criticism-heavy-tactics>

commercial purposes. Please advise us if the costs associated with processing this request will exceed \$100.00.

If you have any questions about this request or foresee any problems in fully releasing the requested records, please contact me at eraskin@citizensforethics.org, and please copy hhammado@citizensforethics.org on all communications. Where possible, please produce records in electronic format. Please send the requested records to me in electronic form to eraskin@citizensforethics.org and hhammado@citizensforethics.org. If it's not possible to produce them electronically, please contact me at that email, and I will provide a mailing address. Thank you for your assistance.

Sincerely,



Elliot Raskin