

LAW OFFICES
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June 9, 2009

Traci L. Hughes
Executive Director of the Office of Communications
Metropolitan Police Department
300 Indiana Avenue, NW, 5140
Washington, DC 20001
(202) 727-4822 fax

Sent via facsimile and certified mail

Re: Freedom of Information Act Request

Dear Ms. Hughes:

Pursuant to the District of Columbia Freedom of Information Act, D.C. Code § 2-531 et seq., the Partnership for Civil Justice Fund (PCJF) is requesting documents from the District of Columbia pertaining to the inter-agency task force whose officers were involved in the June 8, 2009 shooting of a resident of the Trinidad neighborhood of Washington, D.C., reportedly in the 1200 block of Holbrook Street, N.E.

According to published reports, the officers involved in the above-referenced incident were working as part of an MPD and federal "inter-agency task force dubbed Operation Safe Streets, which addresses violence throughout the region and is overseen by the FBI." See Debbi Wilgoren and Martin Weil, *The Washington Post*, June 9, 2009 online edition, <http://www.washingtonpost.com/wp-dyn/content/article/2009/06/08/AR2009060804330.html> .

References herein to the "Operation Safe Streets" are intended to encompass the inter-agency task force whose members were involved in the above-referenced shooting, regardless of the multiple potential variations in nomenclature as may be used to reference this task force (i.e., "Operation Safe Street(s)," the "Safe Street(s) Initiative," the "Safe Street(s) Violent Crimes Initiative," the "Safe Street(s) Task Force," and/or with similar nomenclature).

There is scant reference on the MPD web site to this task force, by which federal and local officers are apparently deployed in plain clothes or undercover capacity within residential neighborhoods in Washington, D.C., and also with the apparent authority to use lethal force.

We seek disclosure and production of:

- Copies of all staff manuals and instructions, including all general orders, all special orders, all Departmental directives and all statements of policy pertaining to the "Operation Safe Streets." This request seeks production of all responsive material in your possession regardless of whether authored or initiated by the MPD or by any other person or agency;
- All agreements or memoranda of understanding pertaining to the deployment of officers associated with the "Operation Safe Streets;"
- All policies and procedures regarding "Operation Safe Streets;"
- All police reports and records pertaining to the above-referenced June 8, 2009 shooting in or near the neighborhood of Trinidad;
- All recorded police channel communications, including "radio runs," pertaining to or responding to the incident. Recordings of all emergency or "911" calls pertaining to the incident.

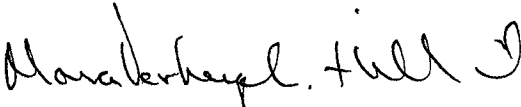
The PCJF is hereby requesting a fee waiver of any fees pursuant to D.C. Code § 2-532(b). Furnishing of the requested information will primarily benefit the public interest in ensuring police accountability and community safety.

The Partnership for Civil Justice is a not-for-profit legal and educational organization which, among other things, seeks to ensure constitutional accountability within police practices and to review and research police practices for such purposes. The material requested is not for commercial use and is sought for legal and scholarly review and research by the attorneys and staff of the PCJF and for publication and dissemination to the public, residents and citizens of the District of Columbia.

The District of Columbia is required, within 15 days of receipt of this FOIA request, to produce the responsive public records and/or respond to the request. D.C. Code § 2-532(c).

We are requesting expeditious processing, and production as soon as possible, given the gravity and urgency of the circumstances. To the extent that some requested information/material/recordings may be available more quickly than others, we are requesting immediate and timely production of information as it is available.

Sincerely,


Mara Verheyden-Hilliard