



Teresa J. Nelson  
Legal Director  
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Office: 651.529.1692

February 17, 2022

Mr. Casey Carl  
City Clerk and Chief Information Officer  
350 South 4th Street  
Minneapolis, Minnesota

Dear Mr. Carl:

Pursuant to the Minnesota Government Data Practices Act (“MGDPA”), Minn. Stat. Chapter 13, the American Civil Liberties Union of Minnesota requests access to the following data.

1. Copies of all data relating to the preparation and release of information to the public about the police killing of Amir Locke, including, but not limited to, drafts and final press releases including metadata that identifies the original author and the author of edits to the initial draft, drafts and final talking points including metadata that identifies the original author and the author of edits to the initial draft, and internal communications regarding same;
2. Copies of all bodycam footage—starting at the time each body camera was initially activated until it was deactivated for the last time at the end of the incident—from every officer who was present when officer Mark Hanneman killed Amir Locke;
3. All data regarding the policy adopted in 2021 restricting no-knock warrants, including but not limited to all internal communications about the policy change, drafts and the final adopted policy including metadata that identifies the original author and the author of edits to the initial draft, all training materials related to the policy change, all written materials and internal communications providing guidance on the implementation of the policy, all communications with the Peace Officers Federation of Minneapolis regarding the policy change;
4. All data regarding the Minneapolis Police Department’s implementation of the statutory limitations on no-knock warrants adopted by the Minnesota legislature in 2021 and set forth in Minnesota Statute Section 626.14 including but not limited to all internal communications about the new statutory limitations, drafts and the final documents relating to policy and guidance on implementation of the statutory limitations including metadata that identifies the original author and the author of edits to the initial draft, all training materials related to the statutory limitations, all written materials and internal communications providing guidance on the implementation of the policy, and all communications with the Peace Officers Federation of Minneapolis regarding the statutory limitations;

5. All data regarding the moratorium on no-knock warrants imposed by Minneapolis Mayor Jacob Frey including all internal communications about the moratorium, drafts and the final adopted moratorium including metadata that identifies the original author and the author of edits to the initial draft, all training materials related to the moratorium, all written materials and internal communications providing guidance on the implementation of the policy, all documents that explain the meaning and contours of exception to the moratorium, which allows the use of no knock warrants when there is an imminent threat of harm to an individual or the public and the warrant is approved by the Chief;
6. All data regarding the warrant applications related to this incident, including, but not limited to, complete copies of the applications and supporting affidavits, internal communications regarding same, communications between Minneapolis Police Department personnel and St. Paul Police Department Personnel regarding same, and data sufficient to document the approval process for seeking a no-knock warrant including identifying the individual or individuals within the Minneapolis Police Department who reviewed and approved the application as required by Minnesota Statute Section 626.14;
7. All data sufficient to identify all no-knock warrant applications that were denied approval upon review by the individual or individuals within the Minneapolis Police Department who are responsible for reviewing and approving no-knock warrant applications as required by Minnesota Statute Section 626.14.;
8. All data sufficient to explain the Minneapolis Police Department's policies and protocol for making public statements about police use of deadly force.

Instructions:

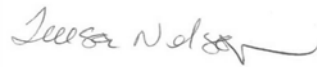
1. Unless otherwise indicated, these requests seek data existing from January 1, 2018 to the present.
2. Data means "all data collected, created, received, maintained, or disseminated by any government entity regardless of its physical form, storage media, or conditions of use." Minn. Stat. § 13.02, subd. 7.
3. "Communications" include text messages, email, instant messages, phone messages, call records and any other form of written and/or audio communications utilized by City of Minneapolis personnel.
4. If you believe the requested data contains information not subject to disclosure under the MGDPA (such as an officer's name or other identifying information), please redact the responsive data in a manner sufficient to protect the information exempt from disclosure and disclose everything else. *See, e.g., Prairie Island Indian Cmty. v. Dept. of Pub. Safety*, 658 N.W.2d 876, 888 (Minn. Ct. App. 2003) ("[When a document

contains both public and nonpublic information, it is appropriate to redact the protected information and release the public information.”); *see also* IPAD Op. 96-035 (stating that a government entity “may not deny access to all of the data in the [documents] on the basis that some of the data contained in them are not public”).

5. If there is no responsive data to a particular request exists, please say so. Otherwise, we will assume responsive data does exist and we will expect that you either disclose it or provide the statutory basis for withholding it. Please also provide the statutory basis for any redaction. *See, e.g.*, Minn. Stat. § 13.03, subd. 3 (requiring agencies to either provide the requested data or to “certify in writing that the request has been denied and cite the specific statutory section, temporary classification, or specific provision of federal law upon which the denial was based”).

The ACLU-MN will also submit this request via the City’s online portal. Please contact me if you have any questions or need clarification about the request.

Sincerely,



Teresa Nelson  
ACLU-MN Legal Director