January 29, 2021

Chicago Police Department
Attn: Freedom of Information Officer
Freedom of Information Section, Unit 114
3510 S. Michigan Ave.
Chicago, IL 60653
foia@chicagopolice.org

Dear Sir or Madam:

On behalf of the Immigrants’ Rights Clinic at the University of Chicago Law School, and pursuant to Illinois Freedom of Information Act (FOIA), 5 ILCS 140/1 et seq., we respectfully request that your office provide the following public records related to the Chicago Police Department’s (“CPD”) information-sharing arrangements with the Department of Homeland Security (“DHS”) through the Chicago Fusion Center (“Fusion Center”), also known as the Chicago Crime Prevention and Information Center. Unless otherwise noted, the following requests relate to the time period January 1, 2019 to present.

1. All contracts, licensing agreements, and nondisclosure agreements between the DHS and the City of Chicago and/or CPD in effect at any time between January 1, 2003 and present.
2. All policy directives, guidance documents, memoranda, training materials, or similar records governing the CPD’s use of the Fusion Center for immigration, law enforcement, or other purposes. Any memoranda of understanding between CPD and DHS to share data, access remote systems or other forms of information sharing with external agencies issued or in effect between January 1, 2003 and present.
3. All training materials governing the use, sharing, or access to any data related to, collected by, or processed through the Fusion Center.
4. All policy directives, guidance documents, memoranda, training materials, or similar records governing information-sharing between the Fusion Center and other information centers operated by CPD, including Strategic Decision Support Centers (SDSC), Real-Time Crime Centers (RTCC), and Area Technology Centers (ATC).
5. All training materials governing the use, sharing, or access to any data related to, collected by, or processed through SDSC, RTCC, and ATC.
6. All records documenting the Fusion Center’s compliance with the City of Chicago’s Welcoming City Ordinance, Chicago Municipal Code Chapter 2-173.
7. All records documenting other information centers’ compliance with the Welcoming City Ordinance, Chicago Municipal Code Chapter 2-173, including those concerning the SDSC, RTCC, and ATC.
8. All records that describe the function and use of software systems and databases in use at the Fusion Center, including surveillance cameras, body worn cameras, facial recognition, gang databases, social media surveillance, cell phone tracking, ShotSpotter, Automatic License Plate Recognition, Cell Site Simulators, cash tracking, and tip reporting software. These records may include promotional materials created by the
vendors that provide these systems, memoranda and training materials on these systems’
function or use, and similar records.
9. All records, reports, audits, and other documents describing the validation, accuracy,
reliability, and policy compliance of all software systems and databases identified in
Request 8.
10. All records that describe the function and use of the software systems and databases
identified in Request 8, and any similar software systems and databases, used by CPD’s
other information centers, including SDSC, RTCC, and ATC.
11. All records reflecting the number of searches by the Department of Homeland Security,
and all searches run relating to civil immigration enforcement, through the Fusion Center.

Additionally, the Immigrants’ Rights Clinic at the University of Chicago Law School
requests a waiver of all fees because such a waiver is in the public interest. A waiver or reduction
of fees associated with FOIA requests is considered in the public interest “if the principal purpose
of the request is to access and disseminate information regarding the health, safety and welfare or
the legal rights of the general public and is not for the principal purpose of personal or
commercial benefit.” 5 ILCS 140/6(c). The Immigrants’ Rights Clinic, part of the Mandel Legal
Aid Clinic at the University of Chicago Law School is a nonprofit legal practice that provides free
legal services primarily to indigent clients, as well as legal research and other services to
nonprofit community organizations advocating for immigrants’ rights in Chicago. The Clinic has
no commercial interest in this information. There has been significant public interest in law
enforcement use of surveillance technology in the Chicago immigrant community. Disclosure to
the Clinic will shed light on whether and how surveillance done by Chicago law enforcement
reaches other law enforcement entities, and how that impacts immigrant communities. Consistent
with its past practices, the Immigrants’ Rights Clinic at the University of Chicago Law School plans to serve an important public education function by disseminating the above information to
the public through reports, press releases, or other media. In sharing this information with the
public, the Clinic intends to foster educated public debate over law enforcement surveillance
information sharing, in an effort to develop sound and reasonable public policies for the affected
communities.

For these reasons, this request for a full fee waiver should be granted. If the anticipated
costs associated with this Request exceed $25.00, please notify us and provide an estimate within
a reasonable period of time.

Thank you for your attention to this request. Requesters anticipate your determination on
its request within five (5) calendar days. 5 Ill. Comp. Stat. 140/3(d). We request that the records
be made available electronically, by e-mail attachment if available or CD-ROM if not. These
records can be sent to me, A. Nicole Hallett, at the following address: nhallett@uchicago.edu or
at 6020 S. University Ave., Chicago, IL 60637. I may also be reached by phone at 773-702-9611.
Please do not hesitate to contact us with any questions.
Sincerely,

A. Nicole Hallett
Associate Clinical Professor of Law
Director, Immigrants’ Rights Clinic