

centerforconstitutionalrights
on the front lines for social justice

March 1, 2018

Custodian of Records
Danielle Aymond
Executive Counsel
Governor's Office of Homeland Security
& Emergency Preparedness
7667 Independence Blvd.
Baton Rouge, LA

Re: Public Records Request

Dear Ms. Aymond:

On behalf of 350 New Orleans, Humanitarian Enterprise of Loving People (HELP), L'Eau Est la Vie, and the Louisiana Bucket Brigade, organizations based in Louisiana, and pursuant to the Louisiana Public Records Law, La. R.S. § 44:1 *et seq.*, we request that you produce copies of **any and all public records related to the Bayou Bridge Pipeline project**, including public opposition thereto.

This request includes, *but is not limited to*, records, including any communications, relating to:

- 1) Surveillance and/or monitoring of public opposition to the Bayou Bridge Pipeline project including but not limited to public protests, events, communications, publications (online or in print) or any other type of public opposition, as well as any policies pursuant to which such monitoring and/or surveillance is conducted.
- 2) Any of the requesting organizations, their staff, board members, and any individuals and affiliates associated with them, including:
 - a) 350 New Orleans
 - b) Humanitarian Enterprise of Loving People
 - c) L'eau Est la Vie
 - d) Louisiana Bucket Brigade

“Record(s)” as used herein includes, but is not limited to, all Records or communications in written or electronic form (including metadata), such as correspondences, calendars, calendar entries, agendas, itineraries, event programs, call logs, voice mails, phone messages, emails, text messages, messages through social media accounts such as Facebook or Twitter, documents, data, videotapes, audio tapes, faxes, files, receipts, guidance, guidelines, evaluations, instructions, analyses, memoranda, agreements, notes, orders, policies, procedures, legal

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opinions, protocols, reports, rules, talking points, technical manuals, technical specifications, training manuals, studies, or any other Record of any kind.

“Communication(s) means the transmittal of information whether facts, ideas, inquiries or otherwise.

We ask that you produce these records electronically to avoid unnecessary fees and save paper.

As you know, R.S. § 44:32(D) of the Louisiana Public Records Act requires a response to this request within three (3) business days, exclusive of Saturdays, Sundays, and legal holidays. Further, pursuant to La. R.S. §44:35(A), your office has five business days from the date of this request to provide access to or copies of the records requested.

Should you wish to raise any question as to whether the requested material is a public record subject to disclosure, you must notify us in writing within three business days of the basis for holding any such record exempt. La. R.S. §44:32(D).


If the records are not currently in your possession, please notify us in writing, and provide any and all information about where and with whom the records may be found, requested, viewed or copied, and/or when they will become available to your office.

The requesters request a waiver of fees as this request is in the public interest and for a public purpose and the copies of records requested will not be used for any personal or proprietary purpose. Enclosed please find a completed Certification Form for Free or Reduced Rates.

If you deny any part of this request, please cite each specific exemption to the Louisiana Public Records Law that you have determined justifies the refusal to produce the records.

Thank you in advance for your time and assistance in this matter. Please feel free to contact me with questions concerning this request using the contact information below.

Best regards,



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Governor's Office of Homeland Security and Emergency Preparedness CERTIFICATION FOR FREE OR REDUCED RATES

Important: Free and reduced copy fees are given only under the following conditions: to citizens of the State of Louisiana who are indigent and lack the means to pay \$0.25 per copy, or use of the copies requested will be limited to a public purpose as determined by the Custodian of Records (including but not limited to use in a hearing before any government regulatory commission), the information requested is not to be used for personal or proprietary use.

**IF YOU BELIEVE THE ABOVE CIRCUMSTANCES APPLY TO YOUR REQUEST,
PLEASE COMPLETE THE FORM BELOW.**

PRINT AND COMPLETE ALL INFORMATION AND SUBMIT WITH PUBLIC RECORDS REQUEST FORM

Sign, date and submit to:

GOHSEP
Attention: Custodian of Records
Public Records Request
7667 Independence Boulevard
Baton Rouge, LA 70806

Fax: 225.925.7348 or Email: goshepcor@la.gov

I, Pamela C. Spees, of the Center for Constitutional Rights
Name Organization/Company

Mailing Address 666 Broadway, 7th Floor

City New York State NY Zip 10012

Telephone (212) 614-6431 Fax (212) 614-6499 E-Mail pspees@ccrjustice.org

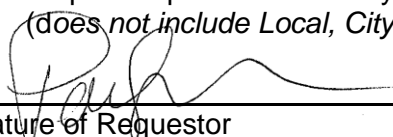
do hereby certify **ONE OF** the following:

CERTIFICATION FOR REDUCED COPY FEE (Check one)

- I am a citizen of the State of Louisiana who is indigent and lacks the means to pay \$0.25 per copy.
- The use of copies requested will be limited to a public purpose (including but not limited to use in a hearing before any government regulatory commission). I further certify that the information is not to be used for personal or proprietary use. I understand that if, in the future, GOHSEP determines my use of these documents to be different than represented here, the Agency reserves the right to recover cost for copying at the normal rate. (Local, City or Parish Government entities may qualify for reduced fees under these criteria.)

CERTIFICATION FOR FREE COPIES (Check one)

- The copies requested are solely for use by the Federal Agency named above.
- The copies requested are solely for use by the Louisiana State Government Agency named above,
(does not include Local, City or Parish Government entities).


Signature of Requestor

March 1, 2018
Date