

centerforconstitutionalrights
on the front lines for social justice

March 1, 2018

Lt. J.B. Slaton
Public Affairs Office
Custodian of Records
Department of Public Safety
and Corrections
7919 Independence Blvd.
Baton Rouge, LA

Re: Public Records Request

Dear Lt. Slaton:

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 requester 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

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.

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 at any time with questions concerning this request using the contact information below.

Best regards,



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