October 3, 2025

Sent via Email and U.S. Certified Mail

U.S. Department of Justice
Office of Justice Programs
FOIA Office
999 North Capitol Street, NE
Washington, DC 20531
FOIAOJP@usdoj.gov

RE: FREEDOM OF INFORMATION ACT REQUEST

To Whom it May Concern:

Robert F. Kennedy Human Rights ("RFK Human Rights" or "RFKHR"), National Police Accountability Project ("NPAP"), Black Lives Matter, D.C., National Immigration Project ("NIPNLG"), Lawyers' Committee for Civil Rights Under Law, and Human Rights Data Analysis Group ("HRDAG") (collectively, "Requesters" or "we") submit this request pursuant to the Freedom for Information Act ("FOIA"), 5 U.S.C. § 552 *et seq.*, as amended, for public records in the custody of the United States Department of Justice ("DOJ") and its component agencies, Office of Justice Programs ("OJP"). We request copies of the records identified in the numbered paragraphs below, pertaining to the National Law Enforcement Accountability Database ("NLEAD") and its decommission and removal from the DOJ website.

We ask that you please direct this request to all appropriate offices and departments within each agency or component, including but not limited to the Bureau of Justice Statistics ("BJS") and the Justice Management Division ("JMD").

We also request expedited processing for this request, pursuant to 5 U.S.C. § 552(a)(6)(E) and agency regulations, and a fee waiver, pursuant to 5 U.S.C. § 552(a)(4)(A)(iii).

Purpose of the Request

This request concerns the development, construction, operation, and decommissioning of the NLEAD, established in 2023 to advance "new practices in law enforcement recruitment, hiring, promotion, and retention, as well as training, oversight, and accountability."[1] The NLEAD consisted of a centralized repository of official records documenting instances of law enforcement officer misconduct as well as commendations and awards, and was accessible to all federal law enforcement agencies.[2] In December 2024, the DOJ reported that the NLEAD "appear[ed] to be working as intended."[3] But on or about January 24, 2025, DOJ "decommissioned" the NLEAD, reportedly in response to Executive Order 14148, which revoked a series of prior Executive Orders, including Executive Order 14074 pursuant to which the NLEAD was established. EO 14148 directs that in implementing that Executive Order, "the heads of each agency shall take immediate steps to end Federal implementation of unlawful and radical DEI ideology."

In December of 2024, prior to the NLEAD being decommissioned, the Bureau of Justice Statistics ("BJS") published a report covering the first 9 months of NLEAD's operation. The report highlighted, among other facts, that, as of September 20, 2024:

- All 90 federal law enforcement agencies required to report to the NLEAD plus four additional agencies submitted records or submitted documentation that they had zero qualifying incidents for all their officers for the period 2018–2023.
- There were 4,790 records of federal officer misconduct for 4,011 federal law enforcement officers in the NLEAD for the period 2018–2023.
- 63% (3,031) of the incidents in the NLEAD were for sustained complaints or records of disciplinary action based on findings of serious misconduct.
- More than 84% of federal law enforcement officers whose agencies reported to the NLEAD were from either DOJ (59,570) or the Department of Homeland Security ("DHS") (65,150).
- DOJ and DHS accounted for 88% of the incidents reflected in NLEAD, with 2727 incidents from DOJ officers and 1479 incidents from DHS officers. Some officers from both DOJ and DHS had multiple records of disciplinary action or serious misconduct.

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[1] See Bureau of Justice Statistics, *National Law Enforcement Accountability Database*, (quoting Exec. Order No. 14074) (May 25, 2022), https://perma.cc/5LSX-JXCQ; See also Exec. Order No. 14074, 87 F.R. 32945.

[2] Shelley S. Hyland, *National Law Enforcement Accountability Database, 2018-2023*, Bureau of Justice Statistics (Dec. 2024), https://perma.cc/YG2K-388X.

[3] U.S. Dep't of Just., Office of Pub. Affs., *FACT SHEET: National Law Enforcement Accountability Database*, (Dec., 19, 2024), https://perma.cc/CU8D-TL98.

- Between January 1, 2024 to August 31, 2024, 9,985 searches were conducted on records in the NLEAD. In August 2024 alone, 3,000 searches were conducted.[4]

NLEAD was intended to assist State, Local, Tribal and Territorial ("SLTT") law enforcement as well as federal law enforcement agencies in strengthening their hiring practices.[5] To that end, as of December 2024, DOJ was partnering with two nongovernmental entities, the International Association of Directors of Law Enforcement Standards and Training ("IADLEST") and the International Justice and Public Safety Network ("Nlets"), to develop a process to allow SLTT law enforcement agencies to query the NLEAD to improve accountability in their hiring of current or former federal law enforcement officers. That process had not been completed by January 2025 when the NLEAD was decommissioned. Consequently, SLTT law enforcement agencies never gained access to the database. At present, neither Federal nor SLTT law enforcement agencies seeking to hire an individual who has worked in federal law enforcement at any time since 2018 has any streamlined mechanism to determine if the applicant under consideration has a history of serious misconduct or a disciplinary record during their time as a federal law enforcement officer.

Requesters are organizations that work to advance human and civil rights, and to bring to light and combat law enforcement overreach and abuse. They publicize instances of law enforcement misconduct; publish reports and alerts; maintain databases; engage in scholarship and advocacy; amplify the voices of grassroots organizations and individuals and communities most affected by law enforcement abuse and overreach; support legal advocates; provide legal advice and pursue litigation related to excessive force, conditions of detention and other forms of law enforcement overreach and misconduct. Requesters are concerned with immigrants, communities of color, and others disproportionately affected by law enforcement misconduct. Advancing law enforcement accountability and oversight is a key component of Requesters' missions.

Requesters have a vested interest in mechanisms that hold law enforcement officers to account when they engage in misconduct, and in preventing law enforcement officers whose own agencies and departments have disciplined them for serious misconduct from moving to new jobs in law enforcement despite records of misconduct. They also have a strong interest in understanding where and how often federal law enforcement officers engage in misconduct. The now defunct NLEAD was an important tool for advancing law enforcement accountability and identifying patterns of federal law enforcement conduct. Requesters urgently seek information on the development and operation of the NLEAD and on the federal government's policies, directives, expenditures and actions relating to the NLEAD and its decommissioning.

The disclosure of the information sought below will contribute to "public understanding of the operations or activities of the government," 5 U.S.C. § 552(a)(4)(A)(iii), and will provide the public with information necessary to engage in the democratic process and public debate regarding accountability for federal law enforcement officers, the integrity of federal law enforcement operations, and expenditures (and waste) of government resources. This FOIA request furthers the efforts of Requesters to investigate, educate the public about, and advocate for accountability and

[4] Hyland, at 4, 6-8 (Dec. 2024), https://perma.cc/YG2K-388X.
[5] *Id.* at 8.

against federal law enforcement abuses and misconduct, to challenge the improper treatment of immigrants and those who support them, and to expose inhumane conditions within immigration detention and the federal prison system. We seek this information in order to better publicize issues concerning law enforcement abuse generally and the elimination of the NLEAD in particular, to advocate for our clients and to advance the civil rights and safety of individuals involved with the immigration and criminal justice systems, and for all those who interact with law enforcement officers. Disclosure would thus be "in the public interest." 28 C.F.R. § 16.10(k)(1).

Definitions

The Records request below incorporates the following definitions:

"Communications" refers to the transmittal of information in any format, including, but not limited to, the communication formats listed under "Record."

Requesters use the terms "federal law enforcement agency," "federal law enforcement officer" and "officer misconduct record" as those terms are used in the Statistical Brief: National Law Enforcement Accountability Database, 2018-2023.[6]

"Personnel" refers to an individual employed by an organization or authorized to act on behalf of an organization, including employees, contractors, contractors' employees, agents, or representatives.

"Records" refers to all information in electronic, written, and/or printed form that is in DOJ's constructive possession, directly or indirectly, regardless of where or how the information originated or where or how DOJ received it, encompassing but not limited to any information in the Custody of any contractors for purposes of information management for DOJ, and including but not limited to: messaging communications between phones or other electronic devices, including but not limited to communications sent via short message service ("SMS"), multimedia message service ("MMS"), or any other messaging service, via Blackberry Messenger, iMessage, WhatsApp, Facebook, Signal, G-Chat, Instagram direct message, Twitter direct message, Slack, and/or any other messaging and communications platform; emails, letters, faxes, and/or any other form of correspondence; minutes and/or notes of meetings and/or phone calls; voicemail messages; images, video, and/or audio data; social media posts; calendar entries; files and their contents, including any notes; logs, spreadsheets, worksheets, and/or coversheets; database entries, analyses of data; metadata; investigations, reports, studies, and/or reviews; internal memoranda; contract, agreements, and/or memoranda of understanding, including but not limited to Intergovernmental Services Agreements; presentations, formal or informal; training criteria, standards, evaluations, and/or materials; orders, directives, and/or instructions; legal opinions and/or memoranda; Policies, procedures, protocols, and/or manuals; guidance and/or guidelines; bulletins, advisories, and/or alerts; as well as any reproductions thereof that differ in any way from any other reproduction, such as copies containing notations, drafts, and revisions.

[6] *Id.* https://perma.cc/YG2K-388X.

In requesting "Communications," the Requesters seek any record of written correspondence or verbal correspondence, whether formal or informal, in any format, including intra-agency, interagency correspondence, and agency correspondence with third parties.

The date range for all searches should be understood to commence with each provided start date and to end on the date the search for documents responsive to that request is commenced by the agency. *See Ferguson v. U.S. Dep't of Educ*., 2011 WL 4089880, at *11 (S.D.N.Y. Sept. 13, 2011) (commencement date of agency's search was reasonable cut-off date).

Request for Information

Requesters seek the following Records, beginning January 1, 2018, through the time the search responsive to this FOIA request is completed, unless otherwise specified:

1. Any and all Records and Communications that were prepared, received, transmitted, collected, and/or maintained by DOJ in connection with the establishment of the NLEAD. This includes:
    a. All Records and Communications between DOJ and any other Federal agency including the White House concerning the establishment of the NLEAD
    b. All Records and Communications within DOJ (including, but not limited to the OJP, BJS and JMD) concerning the establishment of the NLEAD
    c. All Records and Communications between DOJ and any SLTT law enforcement agency concerning the establishment of the NLEAD
    d. All Records and Communications between DOJ and any non-governmental individual or entity the establishment of the NLEAD
2. Any and all Records and Communications that were prepared, received, transmitted, collected, and/or maintained by DOJ in connection with the development or construction of the NLEAD. This includes:
    a. All Records and Communications between DOJ and any other Federal agency including the White House concerning the development or construction of the NLEAD
    b. All Records and Communications within DOJ (including, but not limited to the OJP, BJS and JMD) concerning the development or construction of the NLEAD
    c. All Records and Communications between DOJ and any SLTT law enforcement agency concerning the development or construction of the NLEAD
    d. All Records and Communications between DOJ and any non-governmental individual or entity concerning the development or construction of the NLEAD
    e. All studies that were performed related to development or construction of the NLEAD
3. Any and all Records and Communications that were prepared, received, transmitted, collected, and/or maintained by DOJ in connection with the operation of the NLEAD. This includes:
    a. All Records and Communications between DOJ and any other Federal agency including the White House concerning the operation of the NLEAD
    b. All Records and Communications within DOJ (including, but not limited to the OJP, BJS and JMD) concerning the operation of the NLEAD

c. All Records and Communications between DOJ and any SLTT law enforcement agency concerning the operation of the NLEAD
d. All Records and Communications between DOJ and any non-government individual or entity concerning the operation of the NLEAD
e. All complaints that were received or expressions of appreciation related to the operation of the NLEAD
f. All Record reflecting input of data or usage of the NLEAD not reflected in the December 2024 Statistical Brief, including but not limited to:
    i. The number of officers for federal law enforcement agencies reporting to the NLEAD between September 21, 2024 and the decommissioning of the NLEAD
    ii. The number of officer misconduct records entered into the NLEAD for 2024 or 2025 (broken down by agency and component, and by type of incident, if available)
    iii. The number of law enforcement officers whose records were entered into the NLEAD for 2024 or 2025 (broken down by agency and component, and by type of incident, if available)
    iv. The number of NLEAD searches (broken down by month) between September 21, 2024 and the decommissioning of the NLEAD

4. Any and all Records and Communications that were prepared, received, transmitted, collected, and/or maintained by DOJ in connection with decommissioning the NLEAD. This includes:
    a. All Records and Communications between DOJ and any other Federal agency including the White House concerning decommissioning the NLEAD
    b. All Records and Communications within DOJ (including, but not limited to the OJP, BJS and JMD) concerning decommissioning the NLEAD
    c. All Records and Communications between DOJ and any SLTT law enforcement agency concerning decommissioning the NLEAD
    d. All Records and Communications between DOJ and any non-governmental individual or entity concerning decommissioning the NLEAD
    e. All Records or Communications constituting or reflecting analyses undertaken by DOJ before decommissioning the NLEAD, including but not limited to:
        i. The factors and evidence DOJ considered in deciding to decommission the NLEAD
        ii. The conclusions DOJ reached in evaluating those factors
        iii. The definition of "unlawful and radical DEI ideology" in the context of the NLEAD
        iv. Any alternatives to decommissioning the NLEAD considered by DOJ
    f. All Records and Communications reflecting the current status of the NLEAD data, including but not limited to its preservation
    g. All Records and Communications reflecting attempts to contribute new data to the NLEAD after it was decommissioned
    h. All Records and Communications concerning efforts to access the NLEAD after it was decommissioned
5. Any and all Records and Communications that reflect the cost of development and construction of the NLEAD

6. Any and all Records and Communications that reflect the cost of decommissioning the NLEAD
7. Any and all Records and Communications concerning integrating SLTT records into the NLEAD, or providing NLEAD users with access to SLTT records.
8. Any and all Records and Communications concerning providing SLTT law enforcement agencies the ability to conduct searches in the NLEAD

Format of Request

The Requesters request that responsive documents and materials be produced in their entirety, including all attachments, enclosures, hyperlinks and internal links, and exhibits. If it is determined that a document contains material or information that falls within a statutory exemption to mandatory disclosure under FOIA, the Requesters ask that such material or information be reviewed for possible discretionary disclosure, consistent with the presumption of openness codified in the Freedom of Information Act Improvement Act of 2016, Pub. L. 114185, 130 Stat. 538. If terms or codes are not in the form template and/or publicly defined, please provide a glossary or other descriptive records containing definitions of acronyms, numerical codes, or terms contained in data responsive to this request. Please search for responsive records regardless of format, medium, or physical characteristics, and including electronic records.

Please provide the requested documents in the following format:

- Data Records in native format when possible (e.g., Excel spreadsheets in Excel);
- Other Records in PDF format when possible;
- Electronically searchable when possible;
- Email attachments provided in sequential order following the email, to preserve the "parent-child" relationship, such that Requesters are able to identify which documents were the attachments to which emails;
- Email parents include BCC and any other hidden fields; and
- Other metadata preserved for all Records.

Please furnish all applicable Records in electronic format as specified above to via email: Delia Addo-Yobo at addo-yobo@rfkhumanrights.org and Anthony Enriquez at enriquez@rfkhumanrights.org.

Requesters

Robert F. Kennedy Human Rights

Robert F. Kennedy Human Rights ("RFKHR") is a non-partisan, not-for-profit organization that promotes human rights through information campaigns and advocacy. As an organization primarily engaged in the dissemination of information, RFKHR engages in strategic story telling by building narratives to bring about reform through public education, transparency, and litigation where necessary. A substantial focus of its public education work is devoted to promoting immigrants' rights and publicizing and fighting against the harms of immigration detention. RFKHR also works to expose inhumane and illegal conditions of confinement and law

enforcement conduct outside the immigration system. Obtaining information about government law enforcement activity, analyzing that information, and widely publishing and disseminating it to the public through information campaigns, its website and social media channels (with more than 375,000 followers) and conventional media outlets, are critical and substantial components of RFKHR's work. RFKHR regularly publishes in-depth analyses of current events affecting human rights and broadly disseminates information to expose and rectify injustice. RFKHR disseminates content through its website, https://rfkhumanrights.org/, other websites like https://endthepainongain.org that host its human rights reports. It also issues press releases and public statements that reach thousands. For the past 4 years, RFKHR has also engaged in litigation on behalf of immigrants and individuals involved in the criminal justice system.

National Immigration Project

The National Immigration Project ("NIPNLG") is a national, nonprofit organization dedicated to providing legal assistance and support to immigrant communities and advocating on behalf of noncitizens. Members and supporters of NIPNLG include attorneys, legal workers, law students, judges, jailhouse lawyers, grassroots advocates, community organizations, and others seeking to defend and expand the rights of immigrants in the United States. NIPNLG litigates, advocates, educates, and builds bridges across movements to ensure that those who are impacted by the U.S. immigration and criminal legal systems are uplifted and supported.

NIPNLG is primarily engaged in disseminating information to the public. It is the author of four treatises on immigration law published by Thomson Reuters. NIPNLG provides technical and litigation assistance, participates in impact litigation, advocates for fair and just policies and legislation, provides legal training to the bar and the bench, and regularly publishes practice advisories and community resources on immigration law topics that are disseminated to its members and a large public audience through its website, www.nipnlg.org.

The National Police Accountability Project

The National Police Accountability Project ("NPAP") was founded in 1999 by members of the National Lawyers Guild to address misconduct by police officers and their employers. NPAP has more than 550 attorney members throughout the United States. These attorneys represent plaintiffs in civil actions alleging misconduct by law enforcement officers, including federal law enforcement officers. NPAP represents victims of police abuse, offers training and support to its attorney and legal worker members, and educates the public about police misconduct and accountability. NPAP also supports legislative efforts aimed at increasing accountability. Transparency is an essential prerequisite to accountability and reform.

The Human Rights Data Analysis Group

The Human Rights Data Analysis Group ("HRDAG") is a nonprofit, nonpartisan organization working at the intersection of technology, data, and human rights for nearly 35 years. We are scientists supporting the advocacy community: a team of experts in applied and mathematical statistics, machine learning, computer science, demography, and social science. Our assistance in the collection, processing, organization, review, and dissemination of quantitative evidence has

supported civil society organizations throughout the US as well as truth commissions, UN missions, human rights NGOs, and war crimes prosecutors around the world.

Black Lives Matter D.C.

Black Lives Matter DC ("BLM DC") is a grassroots, not-for-profit organization working to end state violence and systemic racism in Washington, D.C. and beyond. BLM DC is primarily engaged in the dissemination of information to the public in a multitude of ways. The organization conducts political education workshops (Street Law 101, Know Your Rights), hosts large-scale community events, and develops toolkits, reports, and statements that analyze local legislation, policing practices, and community safety strategies.

BLM DC also uses social media and digital platforms, reaching tens of thousands of people, to broadly share information, context, and analysis. It works in coalition with other grassroots organizations to amplify information campaigns and make critical knowledge accessible to those most affected by policing, state violence, criminalization, displacement, and systemic inequities. Through community education, press engagement, collaborative toolkits, and consistent online dissemination, BLM DC ensures that information is obtained, analyzed, and widely distributed to the public in order to promote transparency, accountability, and community-led solutions.

Lawyers' Committee for Civil Rights Under Law

The Lawyers' Committee for Civil Rights Under Law is a nonpartisan, nonprofit organization, formed in 1963 at the request of President John F. Kennedy to mobilize the nation's leading lawyers as agents for change in the Civil Rights Movement. The Lawyers' Committee established the Criminal Justice Project (CJP) to challenge the racial disparities that persist across the American criminal legal system—disparities that erode due process, entrench systemic inequality, and fuel mass incarceration. CJP aims to enhance transparency and accountability within law enforcement, especially for Black and Brown communities that are disproportionately affected by misconduct.We challenge unconstitutional practices like excessive force, unlawful arrests, and racial profiling, while also addressing structural issues such as abusive warrant systems and the misuse of surveillance technologies. By holding police departments accountable in court and in the public square, CJP helps communities demand the safe, fair, and constitutional policing they deserve.

Expedited Processing

We request expedited treatment for this FOIA request. This request qualifies for expedited treatment pursuant to 5 U.S.C. § 552(a)(6)(E) and applicable regulations. As demonstrated above, Requesters include organizations that are primarily engaged in disseminating information, and there is a "compelling need" for expedited processing sought by the Requesters. 5 U.S.C. § 552(a)(6)(E)(i)(I). Moreover, there exists a clear "urgency to inform the public concerning actual or alleged Federal Government activity." 5 U.S.C. § 552(a)(6)(E)(v)(II); see also 28 C.F.R. § 16.5(e)(1)(ii) (expedited processing is warranted where there is "[a]n urgency to inform the public about an actual or alleged federal government activity"). Specifically, the public has a substantial and sustained interest in law enforcement misconduct involving violations of human and civil

rights, as well as in government efforts to hold wrong-doing law enforcement officers to account and to protect the public from known bad actors.

The dismantling of the NLEAD was covered by at least two dozen media outlets and other organizations,[7] which occurred prior to the recent surge of law enforcement activity directed at immigration enforcement and those protesting those recent efforts. Coverage of federal agents, often wearing masks, engaging in excessive force and mass detentions without due process has been widespread and extensive,[8] and will only increase as those detention and policing efforts escalate even further fueled by the massive budget increases for immigration enforcement. The public has an urgent need to know that while the federal government is conducting more immigration raids, more aggressively, with more and more personnel with questionable training and oversight, it has simultaneously removed one of the few guardrails in place to keep bad actors out of the federal law enforcement network and eliminated an important measure of transparency and accountability. Information about the establishment, development, use and decommissioning of the NLEAD is an important and timely aspect of the public discourse on federal law enforcement overreach and accountability. The Requesters are therefore entitled to expedited processing of this request.

Fee Waiver Request

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii), the Requesters apply for a fee waiver. FOIA and applicable agency regulations require fees to be waived when it is determined, based upon the submission of the requester, that the information is "likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester." 5 U.S.C. § 552(a)(4)(A)(iii); *see also* _ C.F.R. § 16.10(k)(1)(permitting fee waiver when "disclosure of the requested information is in the public interest" and "is not primarily in the commercial interest of the requester").

Requesters are non-profit organizations that disseminate information, advocate for reforms concerning law enforcement abuses and for greater accountability, and work with affected individuals and communities. Some Requesters also litigate on behalf of individuals who have

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[7] See, e.g., Martin Kaste, *Trump took down police misconduct database, but states can still share background check info*, National Public Radio (Feb. 28, 2025), https://perma.cc/9JEB-BUEN; Gloria Oladipo, *Trump administration shuts down national database documenting police misconduct*, The Guardian (Feb. 22, 2025), https://perma.cc/W6ES-3GCJ; E.D. Cauchi, *Justice Department shuts down federal law enforcement misconduct tracker*, CBS News (Feb. 21, 2025), https://perma.cc/5AKN-8R6A; Bekim Bruka, *US Justice Department eliminates federal law enforcement accountability database*, JuristNews (Feb. 24, 2025), https://perma.cc/36FE-VQVF; *Shutting down the National Law Enforcement Accountability Database appears to violate records law*, Citizens for Ethics, (Feb. 28, 2025), https://perma.cc/L3AJ-X476; Kanishka Singh, *US Justice Department cuts database tracking federal police misconduct*, Reuters (Feb. 20, 2025), https://perma.cc/2RMS-YUD6; Russell Contreras, *Trump orders database on federal police misconduct to close*, Axios (Feb. 20, 2025), https://tinyurl.com/ew55hd5x; C.J. Ciaramela, *Trump Deletes Database Containing Over 5,000 Police Misconduct Incidents*, Reason (June 2025), https://perma.cc/2LM6-G839.

[8] See, e.g., Fadel et al., *Masked immigration agents are spurring fear and confusion across the U.S.,* National Public Radio (July 10, 2025), https://perma.cc/FT4A-XUPF; Fallon Fischer, *WATCH: ICE agents tase man at Albuquerque Walmart*, The Hill (July 11, 2025), https://perma.cc/L73X-B59Y; Lily Dallow, *U.S. citizen released, no assault charges after violent ICE arrest in L.A. County*, KTLA (June 20, 2025), https://perma.cc/B6DV-CNR3; Jack Belcher, *ICE agents reportedly extract man from his vehicle during Bellingham detention*, The Bellingham Herald (June 20, 2025), https://perma.cc/4CGN-9AAQ; Kaitlyn Huamani, *Immigrant father of three Marines is violently detained, injured by federal agents, son says*, Los Angeles Times (June 22, 2025), https://perma.cc/JR44-9SR6.

been subjected to excessive force. Access to the information sought is crucial for the Requesters and the communities they serve to publicize the impact of the NLEAD and its decommissioning, to advance their advocacy efforts against law enforcement overreach and for greater transparency and accountability with respect to law enforcement misconduct.

Conclusion

Thank you for your consideration of this request. There is an urgent need to inform the public about the NLEAD and its dismantling. If this request is denied in whole or part, the Requesters ask that the DOJ and its component agencies justify all deletions or redactions by reference to specific exemptions of FOIA. The Requesters expect the DOJ and its component agencies to release all segregable portions of otherwise exempt material, and reserve the right to appeal a decision to withhold any records or to deny Requesters' application for waiver of fees.

We look forward to your reply to the request for expedited processing within 10 business days, as required under 5 U.S.C. § 552(a)(6)(E)(ii)(I). Notwithstanding your decision on the matter of expedited processing, we look forward to your reply to the records request within 20 business days, as required under 5 U.S.C. § 552(a)(6)(A)(I). In the event the government is unable to meet that deadline, the Requesters are willing to discuss an appropriate schedule for rolling productions.

If you have any questions regarding the processing of this request, please contact Delia Addo-Yobo at addo-yobo@rfkhumanrights.org or Anthony Enriquez at enriquez@rfkhumanrights.org

Certification

The Requesters certify that the above information is true and correct to the best of the Requesters' knowledge. *See* 28 C.F.R. § 16.5(e)(3).

Sincerely,

/s/ Delia Addo-Yobo
Delia Addo-Yobo
Anthony Enriquez
Robert F. Kennedy Human Rights

/s/ Bridget Pranzatelli
Bridget Pranzatelli
The National Immigration Project

/s/ Lauren Bonds
Lauren Bonds
Eliana Machefsky
The National Police Accountability Project

/s/ Tarak Shah
Tarak Shah
The Human Rights Data Analysis Group

/s/ April Goggans
April Goggans
Black Lives Matter DC

/s/ Freya Jamison
Freya Jamison
Lawyers' Committee for Civil Rights Under Law