

# EXHIBIT A



New York Civil Liberties Union  
125 Broad Street, 19th Fl.  
New York, NY 10004  
(212) 607-3300  
[www.nyclu.org](http://www.nyclu.org)

April 30, 2021

**Via Electronic Mail**

New York City Department of Correction  
Legal Division  
75-20 Astoria Blvd  
East Elmhurst, New York 11370

**Re:** Freedom of Information Law Request

Dear Records Access Officer:

The New York Civil Liberties Union (“NYCLU”) submits this request for records pursuant to the New York Freedom of Information Law, N.Y. Pub. Off. Law § 85, et seq., for access to and copies of the records collected by the New York City Department of Correction (“the Agency”) regarding the requests as described below.

1. Documents sufficient to identify all databases maintained by or on behalf of the Agency that include information about (a) complaints or reports of misconduct against Agency employees, or (b) discipline of Agency employees in response to a complaint or set of complaints.
2. For each database identified in request 1 (above), please provide any documents that include the following:
  - a. A description of the database’s structure or format;
  - b. A description of the each field or column in the database;
  - c. An explanation of all abbreviations or acronyms in the database.
3. Any databases maintained by or on behalf of the Agency that include information about complaints or reports of misconduct against Agency employees, including the following data regarding each complaint or report of misconduct:
  - a. The name, position, and duty station of the Agency employee;
  - b. The type of complaint (e.g. use of force, discourtesy, racial profiling or bias, etc.);
  - c. The date and location of the alleged incident that is the subject of the complaint or report;
  - d. Whether the complaint or report of misconduct was investigated;
  - e. The division of the Agency or the name of the entity that investigated the complaint or report;
  - f. What the outcome of the investigation was (e.g. substantiated/found to be true and not compliant with policy; exonerated/found to be true and compliant with policy; unfounded/found to be untrue; unsubstantiated/insufficient evidence to determine truth or falsity or compliance with policy); and

- g. For each substantiated complaint, whether the investigation resulted in the initiation of a disciplinary process, any disciplinary settlement, or the imposition of discipline.
4. Any databases maintained by or on behalf of the Agency that include information about discipline of Agency employees in response to a complaint or set of complaints, including the following data regarding each instance in which a disciplinary process was initiated other than for a technical infraction that did not involve a member of the public:
  - a. The name, position, and duty station of the Agency employee;
  - b. The type of disciplinary charges (e.g. use of force, discourtesy, racial profiling or bias, etc.);
  - c. The date and location of the alleged incident that is the subject of the disciplinary charges;
  - d. The outcome of the disciplinary charges (e.g. sustained, not sustained, settled); and
  - e. The discipline, if any, imposed (e.g. termination, suspension, loss of pay or vacation days, admonition).

For purposes of clarification, a “database” refers to any tabulated, electronic records.

To the extent that records are available in electronic format (ideally in an electronic spreadsheet or comma-separated format (Excel or CSV)), we request that they be provided in that format.

If any records are unavailable within five business days of receipt of the request, and responsive records exist, we seek a description of such records and a timeline of when access to the records will be provided. If you determine that certain parts of this request may be more easily produced than others, we are amenable to discussing a production schedule for records that will take longer to produce.

Please furnish records to:

Jesse Barber  
New York Civil Liberties Union  
125 Broad Street, 19th Fl.  
New York, NY 10004  
(510) 520-1695  
[jbarber@nyclu.org](mailto:jbarber@nyclu.org)

Please do not hesitate to contact me at [jbarber@nyclu.org](mailto:jbarber@nyclu.org) if you have any questions about this request. Thank you for your prompt attention to this matter.

Respectfully,  
Jesse Barber