



December 13, 2019

**Via Email**

To Whom It May Concern  
Revere Public Schools  
[JVadala@reverek12.org](mailto:JVadala@reverek12.org)

Re: Public records request related to the use of facial-recognition technology

To Whom It May Concern,

This is a request under the Public Records Law, G.L. c. 66, § 10, on behalf of the American Civil Liberties Union of Massachusetts (“ACLUM”). ACLUM seeks records relating to the use of visitor management services and/or facial recognition<sup>1</sup> technology by the Revere Public Schools (“RPS”).

We request documents pertaining to RPS’s use of visitor management services and/or facial recognition technology in schools, administrative buildings, and other RPS properties across the City of Revere. The records we seek include but are not limited to those pertaining to or describing any relationship with LobbyGuard<sup>2</sup> and/or any other private or public entities as it relates to these technologies.

ACLUM requests the following records created on or after January 1, 2016, unless another time period is otherwise specified:

1. Documents relating to RPS purchase, trial, testing, piloting, and/or use of visitor management services and/or facial recognition, including but not limited to: purchase orders, RFPs, licensing agreements, invoices, and contracts (including non-disclosure agreements);
2. All records referencing visitor management services and/or facial recognition, including but not limited to emails, text messages, memoranda, and notes;
3. All records referencing or describing privacy or other concerns about the use of a visitor management and/or facial recognition system, including but not limited to emails, text messages, memoranda, and notes;
4. Any internal policies referencing or pertaining to the use of a visitor management system and/or face recognition technology or facial images;
5. All communications between employees of the RPS and representatives of any private vendor or company offering or soliciting any visitor management and/or facial recognition product or service;

---

<sup>1</sup> In this letter, “**facial recognition**” means the automated or semi-automated process by which a person is identified or attempted to be identified based on the characteristics of his or her face.

<sup>2</sup> “About,” LobbyGuard Solutions, available at <https://lobbyguard.com/about/>

6. Materials relating to how any visitor management and/or facial-recognition product or service functions (or functions improperly), including e-mails, handouts, PowerPoint presentations, advertisements, or specification documents;
7. Manuals, policies, procedures, and practices governing the use or monitoring of a visitor management and/or facial-recognition product or service or related information or databases. This request includes, but is not limited to:
  - a. Procedures for using, deleting, or retaining photos of subjects to be identified;
  - b. Materials identifying any sources of such photos, such as mobile devices, body cameras, surveillance videos, or identification photos;
8. Training materials related to any visitor management and/or facial-recognition product or service;
9. Records relating to any mobile application related to any visitor management and/or facial-recognition product or service;
10. Records relating to any public process or debate about any visitor management and/or facial recognition product or service, including meeting agendas or minutes, public notices, analyses, or communications between the RPS and elected leaders or county or state officials, including but not limited to the Revere City Council, the Revere School Board, the Secretary of Education, members of the Board of the Department of Elementary and Secondary Education (DESE), and the Commissioner of DESE;
11. All contracts, agreements, and/or MOUs with local, state, and/or federal agencies referencing or pertaining to visitor management systems and/or facial recognition technology;
12. All audits, annual reports, and other administrative reports referencing visitor management systems and/or facial recognition technology or searches. This request includes but is not limited to all records containing or pertaining to:
  - a. Statistics and other reports that reflect how facial recognitions tests worked;
  - b. Statistics and other reports that reflect how frequently facial recognition is used;
  - c. Statistics and other reports that show the evolution of facial recognition use over time;
  - d. Statistics and other reports that show the number of times the RPSs misidentified an individual using facial recognition;
13. All training materials, including but not limited to PowerPoint presentations, used to train staff in the use of visitor management systems and/or face recognition tools or capabilities;
14. Any document containing any RPS legal analysis or justification for any use of visitor management systems and/or face recognition technology; and
15. All communications and agreements between RPS employees and employees of the Revere Police Department pertaining to any visitor management systems and/or face recognition technologies.

Because this request involves a matter of public concern and is made on behalf of a nonprofit organization, we ask that you waive any fees. ACLUM is a nonprofit §501(c)(3) organization dedicated to the protection of civil rights and liberties for all persons in the Commonwealth of Massachusetts. As the state's affiliate of the American Civil Liberties Union, the ACLU of

Page 3  
Revere Public Schools  
December 13, 2019

Massachusetts is part of a nationwide network of advocates dedicated to defending and expanding the civil liberties of all.

If you decide not to waive fees, we request that you permit us to examine, at our election, the responsive documents before deciding which portions to copy. We would prefer the documents in electronic format.

If you believe that some portion of the documents requested are exempt from disclosure or require redaction, please release any reasonably segregable portions that are not exempt. In addition, please note the applicable statutory exemption and explain why it applies to the redacted portions. As you know, a custodian of public records shall comply with a request within ten days after receipt.

If you have questions about this request, please contact me at (617) 482-3170 x402 or [efalcon@aclum.org](mailto:efalcon@aclum.org).

Thank you for your assistance. We look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read "Emiliano Falcon". The signature is written in a cursive style with a large initial "E" and a small "7" at the end.

Emiliano Falcon  
Policy Counsel  
Technology for Liberty Program  
ACLU of Massachusetts