



## EXHIBIT A

February 2, 2020

**Submitted via the public records request center.**

Public Records Officer  
Springfield Police Department  
130 Pearl Street  
Springfield, MA 01105

**Re: Public records request related to IBM solicitation related to facial-recognition products or services**

To whom it may concern:

This is a request under the Massachusetts Public Records Law, G.L. c. 66, § 10, made on behalf of the American Civil Liberties Union of Massachusetts (“ACLU”).

The ACLU seeks records<sup>1</sup> related to the relationship between Springfield Police Department and IBM related to the offering, acquisition of, and/or use of facial-recognition<sup>2</sup> technology, including but not limited to products and services like Watson AI.

### **Records requested**

The ACLU requests all such records created on or after September 1, 2019, including but not limited to:

1. Communications between any representative of the Springfield Police Department and any representative of IBM pertaining to any facial-recognition product or service, including any material sent by IBM or any of its representatives.
2. Internal communications between representatives or employees of the Springfield Police Department relating to any IBM facial-recognition product or service.

Because this request involves a matter of public concern and because it is made on behalf of a nonprofit organization, we ask that you waive any fees. ACLU is a nonprofit §501(c)(3) organization dedicated to the protection of civil rights and liberties for all persons in the

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<sup>1</sup> Throughout this request, the term “**records**” includes but is not limited to any paper or electronic information, reports, evaluations, memoranda, correspondence, letters, emails, charts, graphs, flyers, meeting agendas, meeting minutes, training materials, diagrams, forms, DVDs, tapes, CDs, notes, or other similar materials.

<sup>2</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.



Commonwealth of Massachusetts. As the state's affiliate of the American Civil Liberties Union, the ACLU of 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.

Should you determine that some portion of the documents requested are exempt from disclosure, 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 blue ink, appearing to read "Emiliano Falcon". To the right of the signature, there is a date "7/17" written in the same ink.

Emiliano Falcon  
Policy Counsel  
Technology for Liberty Program  
ACLU of Massachusetts

