



JAMES P. SARTELL
CHIEF OF POLICE

TOWNSEND POLICE DEPARTMENT

70 BROOKLINE STREET
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PHONE (978) 597-6214
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ACLU Massachusetts
Attn: Emiliano Falcon
211 Congress Street
Boston, MA 02110

Dear Emiliano Falcon:

On April 6, 2020, we received your request pursuant to the Massachusetts Public Records Law for the following records:

1. All communications, including text messages and emails, between or among any staff member or representative of the police department and any representative of any company that manufactures or sells any facial recognition product, including but not limited to Clearview AI;
2. All internal communications, including text messages and emails, referencing any company that manufactures or sells any facial recognition product or service, including but not limited to Clearview AI;
3. Records evidencing or describing any existing or potential relationship between the police department and all companies that manufacture or sell any facial recognition product, including but not limited to Clearview AI. These records include but are not limited to MOUs, purchase orders, RFPs, licensing agreements, invoices, non-disclosure agreements, project proposals, and other contracts;
4. Records referencing the operational effectiveness or accuracy rate of any of facial recognition service or product. These records include but are not limited to e-mails, handouts, PowerPoint presentations, advertisements, audits, and specification documents;
5. Training materials related to facial recognition products or services;
6. Policies and procedures pertaining to the use of facial recognition products or services, or the data they produce; and
7. Records relating to any public process, meeting, or debate about any facial recognition products or services. These include but are not limited to meeting agendas or minutes, public notices, analyses, and communications between the police department and elected officials.

With respect to your request, the Department intends to provide the following requested records in a complete and unredacted format:

- Department Memorandum dated September 30, 2019 regarding submitting department reports to CopLink (a process overseen by Department of State Police's Commonwealth Fusion Center)



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The Department has waived any associated fees due to the disclosure of the requested record being in the public interest. While it's our understanding CopLink has the ability to provide facial recognition services, we have not utilized these services as of the date of your request. It should also be noted that we are not involved in any relationship with any companies that, to our knowledge, sell any facial recognition product. The remaining records in our possession regarding CopLink are limited to emails to attend training to use the software, IT correspondence about the technical aspects of access, and emails between employees about scheduling (training dates and such). They do not involve administrative decisions regarding the use of facial recognition software or any directions in furtherance of the use of the technology. Producing these department wide emails would take considerable time to assemble particularly in light of reduced administrative staffing due to the Governor's Order to address COVID-19. If you feel as though these emails are within the scope of your request and are relevant to your needs, please let me know and I would be happy to work with you to get you the information requested.

Please be advised that pursuant to 950 CMR 32.00 and G.L. c. 66, section 10A(a) you have the right to appeal this decision to the Supervisor of Public Records within 90 calendar days. Such appeal shall be in writing, and shall include a copy of the letter by which the request was made and, if available, a copy of the letter by which the custodian responded. The Supervisor shall accept an appeal only from a person who had made his or her record request in writing. Pursuant to G.L. c. 66, section 10A(c), you also have the right to seek judicial review by commencing a civil action in the superior court.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "James Sartell", written over a horizontal line.

James Sartell
Chief of Police



COPY

Townsend Police Department

MEMORANDUM

DATE ISSUED: September 30, 2019

NUMBER: MO-19-03

To: All Police Employees
From: Deputy Chief James Sartell
Subject: CopLink
Date: September 30, 2019
No.: MO-19-03

The department has joined 414 agencies across the Commonwealth in submitting records management data to CopLink. CopLink is overseen by the Department of State Police's Commonwealth Fusion Center and comes at no cost to the department. There is only one small change in IMC for the end user. On the first screen you will now see a required field entitled "Incident Category." This is a required field and will provide a number of categories. Choose the one that best fits the incident. There is one for "Other" if needed. I have attached a quick video to illustrate where the box is located etc.

Supervisors will have the ability to exclude cases from being shared with CopLink. Simply click "Exclude Case from Data Share" on the first screen prior to approval. Please email me if you decide to exclude a case so I can take a second look at the case's other sensitivity settings.

I am working with Sgt. Ed Burman from Ashland PD to get everyone access and training for this valuable asset. We are looking at the first or second week of November for a roll call training or two to get it done.

Please see me with any questions or feedback.