

# EXHIBIT 1



666 Broadway, 7th Floor  
New York, New York 10012  
212-614-6464  
ccrjustice.org

May 29, 2020

New York City Civilian Complaint Review Board  
ATTN: Jonathan Darche, Executive Director  
100 Church Street, 10th Floor  
New York, NY 10007

*Via Electronic Mail*

**Re: Freedom of Information Request**

Dear Mr. Darche:

The Center for Constitutional Rights (“CCR”) and Beldock, Levine & Hoffman LLP make this request for records, regardless of format or medium, and including electronic records and information, pursuant to Freedom of Information Law (FOIL), N.Y. Pub. Off. Law §§ 84-90. We respectfully request that you provide us with the following information within five (5) business days of your receipt of this letter:

- (1) Aggregate data on all civilian complaints received by CCRB between March 15, 2020 and the date of this letter containing at least one FADO allegation for improper stop, improper search, and/or excessive force and arising out of, resulting from, or otherwise relating to social distancing enforcement action taken by New York City Police Department (NYPD) members of service. We further request that the data be disaggregated by:
  - i. Type of allegation(s)
  - ii. Race of complainant
  - iii. NYPD Precinct in which the incident in question allegedly occurred
  - iv. Date of complaint

Please provide this information in an electronic format, such as Adobe Acrobat or Microsoft Excel.

As indicated above, the FOIL statute requires that an agency respond within five ( 5) business days of receipt of a FOIL request. Please direct correspondence related to this request to the undersigned via email at [dcharney@ccrjustice.org](mailto:dcharney@ccrjustice.org).

If for any reason any portion of our request is denied, please inform us of the reason(s) for such denial in writing, referencing the specific section of New York Public Officers Law

§87(2) for each denial. Additionally, please provide us with the name, mailing address, and email address of the person or body to whom an appeal should be directed.

Thank you in advance for your prompt attention to this request.

Sincerely,

\s\Darius Charney  
Darius Charney  
CENTER FOR CONSTITUTIONAL  
RIGHTS

\s\Dominique Day  
Dominique Day  
BELDOCK, LEVINE & HOFFMAN LLP