



TENNESSEE
**Immigrant
& Refugee
Rights**
COALITION



July 15, 2019

Sent via Email & US. Certified Mail

Madison County Deputy Mayor: Tony White
100 E. Main St. Suite 103
Jackson, TN 38301
twhite@madisoncountyttn.gov

Re: Tennessee Open Records Act Request

Dear Deputy Mayor White:

This letter constitutes a request pursuant to the Tennessee Open Records Act, § 10-7-503 et seq. Requestor Stephanie Teatro is a Tennessee citizen and, through this letter, requests inspection and copies of the various public records enumerated in the attached chart. This request relates to the Madison County Sheriff Office's (MCSO) involvement in the arrest of 6 individuals suspected of being noncitizens by federal immigration officials on or around Friday, July 12, 2019 in Jackson, TN, near the Rolling Acres Mobile Estates.

We request that any records that exist in electronic form be provided in electronic format. As available on a case by case basis, we also request a waiver of all fees that may result from responding to this request for records. A waiver of fees is justified because this request is made in the public interest to obtain vital information that will be used for educational purposes and shared freely with the public. The information obtained through this request will inform public debate and provide critical information regarding government operations.

Should you deny the fee waiver request, we ask that you notify us of the denial and inform us at your earliest convenience if the fees associated with this request will exceed \$50. In the event that fees are assessed, we request a breakdown of the estimated cost. We ask that you promptly respond to this request within seven days, pursuant to the Tennessee Open Records Act, § 10-7-503(1)(2)(B). If you require additional time to obtain and produce the records requested, we ask that you please notify us and provide an estimated date of completion. Should you deny any part of this request, we also ask that you provide the specific exemption that authorizes the denial. We reserve the right to pursue any appeal that is available to us in the event that you deny any or all parts of the request, the fee waiver request, or fail to respond within the statutory timeframe.

Enclosed, you will find evidence of the Tennessee citizenship of Ms. Teatro and her records request form. Please send all notifications and/or responsive documents to Stephanie Teatro at stephanie@tnimmigrant.org.

If you have any questions regarding this request, please contact Stephanie Teatro at 615-833-0384 or stephanie@tnimmigrant.org. Thank you in advance for your time and response to this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stephanie Teatro', with a long horizontal flourish extending to the right.

Stephanie Teatro
Co-Executive Director
Tennessee Immigrant and Refugee Rights Coalition
2195 Nolensville Pike
Nashville, TN 37211
615-833-0384
stephanie@tnimmigrant.org

Meredith Stewart
Attorney
Southern Poverty Law Center
201 St. Charles Ave, Suite 2000
New Orleans, LA 70170
505-486-8982
meredith.stewart@splcenter.org

Cc: Sheriff John R. Mehr
jmehr@mcsso-tn.org

Request No.	Type of record(s) requested	Time frame or date for the records requested	Subject matter or keywords related to the records
1	Documents	January 1, 2019 - present	All records* relating to the planning, coordination, execution of and follow-up on the vehicle stops and arrests conducted by MCSO and U.S. Immigration and Customs Enforcement (ICE) in Jackson, TN on or around July 12, 2019, including but not limited to, pre-operation plans, arrest records, incident reports, body camera footage, dashboard camera footage, criminal records, and/or booking records.
2	Documents		All records of any communications between the MCSO and any federal agencies, including but not limited to the U.S. Department of Homeland Security (DHS), ICE, Homeland Security Investigations (HSI), related to the vehicle stops and arrests conducted by MCSO and ICE in Jackson, TN on or around July 12, 2019.
3	Documents		All records of any communications between the MCSO and state/local agencies, related to the vehicle stops and arrests conducted by MCSO and ICE in Jackson, TN on or around July 12, 2019.
4	Documents		All records of any communications between MCSO and personnel at North Side High School or personnel of the Jackson-Madison County Board of Education in Jackson, TN related to the vehicle stops and arrests conducted by MCSO and ICE in Jackson, TN on or around July 12, 2019.
6	Documents		All records related to the manner in which the MCSO agents were to conduct the vehicle stops and arrests in Jackson, TN on or around July 12, 2019.
8	Documents		All records detailing the total MCSO staff time and money spent planning, coordinating, and executing the vehicle stops and arrests conducted by MCSO and ICE in Jackson, TN on or around July 12, 2019.
9	Documents		All records detailing the identities of all the MCSO personnel physically present

			during the vehicle stops and arrests conducted by MCSO and ICE in Jackson, TN on or around July 12, 2019, including, but not limited to full name; and rank or official title.
10	Documents		All policies, procedures, guidelines, orders, and practices that were issued, used, or possessed by MCSO concerning immigration enforcement and/or collaboration with federal immigration agents during the relevant period.

* The term "records" as used in this Public Records Act request includes but is not limited to all records or communications preserved in written or electronic form, including but not limited to correspondence, documents, data, videotapes, audio tapes, faxes, files, emails, text messages, guidance, guidelines, evaluations, instructions, analyses, memoranda, agreements, notes, orders, policies, procedures, protocols, reports, rules, technical manuals, training manuals, or studies.