



August 3, 2011

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Lieutenant Dennis Woodland
Custodian of Records
St. Louis County Police Department
7900 Forsyth Blvd.
Clayton, Mo. 63105

Re: Request Regarding Cell Phone Location Records:

Dear Lieutenant Woodland

This is a request under the Missouri Sunshine Law by the American Civil Liberties Union of Eastern Missouri.

We hereby request all records in your possession relating to your acquisition of cell phone location records. This request encompasses records regarding real-time tracking and records regarding where cell phones have been in the past, and it encompasses all available methods of locating cell phones, including "cell site," triangulation, and GPS. This request includes but is not limited to the following records:

- Policies, procedures and practices you follow to obtain cell phone location records
- Data retention policies, detailing how long cell phone location records are kept, databases in which they are placed, and agencies (federal, state and local) with which they are shared
- The use of cell phone location records to identify "communities of interest (detailing those persons who have been called, or called by a target)" in investigations
- The use of cell phone location records to identify all of the cell phones at a particular location
- Your use of "digital fences" (systems whereby you are notified whenever a cell phone comes within a specific geographic area)

- The legal standard (e.g. probable cause, relevance) you proffer to obtain cell phone location records
- Judicial decisions and orders ruling on your applications to obtain cell phone location records
- Statistics regarding your use of cell phone location records, including the number of emergency requests for which no court order was obtained
- The form in which cell phone location records are provided (hard copy, through specific online databases)
- Communications with cell phone companies and providers of location-based services regarding cell phone location records, including
 - company manuals, pricing, and data access policies
 - invoices reflecting payments for obtaining cell phone location records
 - instances in which cell phone companies have refused to comply with a request or order

Because the ACLU of Eastern Missouri is a non-profit public interest organization, we request a fee waiver. If, however, such a waiver is denied, please inform us in advance if the cost will be greater than. \$75.

Thank you for your prompt attention to this matter.

Sincerely,

John Chasnoff
Program Director