

GILBERT & SACKMAN

A LAW CORPORATION

**3699 Wilshire Boulevard, Suite
1200 Los Angeles, California
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FAX TRANSMISSION COVER SHEET

Date: August 12, 2008

To: Helen J. Fludd, Paralegal

LAUSD Office of the General Counsel

Fax: 213-241-8953

Re: CPRA Request Follow Up; additional request

Sender: Scott Miller

YOU SHOULD RECEIVE 6 PAGE(S), INCLUDING THIS COVER SHEET. IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL 323 938-3000.

NOTICE: This fax contains PRIVILEGED AND CONFIDENTIAL INFORMATION intended only for the use of the addressee(s) named above. If you are not the intended recipient of this fax, or an employee or agent of the intended recipient, we ask that you not retain, copy or disseminate this fax. If you have received this fax in error, please immediately notify us by telephone and destroy this fax. Thank you.

August 12, 2008

BY FAX AND U.S. MAIL

Helen J. Fludd, Paralegal
Los Angeles Unified School District
Office of the General Counsel
353 South Beaudry Avenue
Los Angeles, CA 90017

Re: Public Records Request

Dear. Ms. Fludd:

Pursuant to the California Public Records Act ("CPRA"), Government Code sections 6250 *et seq.*, I am writing to follow up on behalf of my client, the Labor Community/Strategy Center (hereafter "LCSC"), concerning an outstanding request for public records processed by your office earlier this year. Specifically, in a letter dated January 29, 2008 addressed to Messrs Damon Azali and Manuel Criollo, you indicated that your office continued to search for records responsive to the categories of documents identified in your correspondence as Request Items #8, 9 and 10. As Messrs Azali and Criollo indicated in their February 22, 2008 correspondence with your office, LCSC considers these portions of its requests "open" and wishes to obtain the information as requested. Please respond at your earlier convenience indicating the results of your search and whether there are any photocopying costs associated with this request. In addition, please advise whether it is possible to obtain documents responsive to this request in electronic format, such as a compact disk.

In addition, pursuant to CPRA and on behalf of LCSC, I am requesting any and all records in the possession, custody or control of your agency as described below.

DEFINITIONS

1. The term "RELATING TO" means referring to, reflecting, supporting, prepared in connection with, used in preparation for, pertaining to, having any relationship to, evidencing or constituting evidence of, or being in any way legally, logically, or factually connected with the matter discussed, in whole or in part.

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2. The term "DOCUMENT" includes any "writing" as defined in Section 250 of the Evidence Code, and shall be deemed to also include any written, recorded or graphic matter, however produced or reproduced, including the original and every non-identical copy regardless of the origin or location, including, but not limited to, contracts, payroll records, employment applications, employment records, work rules, seniority records, evaluations, accounting records, bank statements, correspondence, public documents, reports, agendas, minutes, invoices, billing statements, balance sheets, schedules, notes, proposals, faxes, telegrams, telexes, memoranda, tape recordings, cards, computer files and tapes, computer disks and printouts, transcripts, notes or summaries of telephone or personal conversations, pamphlets, brochures, other publications and drafts or translations of documents. The term "DOCUMENT" shall also include any DOCUMENT relating to any "COMMUNICATION" as that term is defined below. Any DOCUMENT bearing on any sheet or side thereof, any marks, such as initials, receipt stamp, or any note or comment that was not part of the original text, is to be considered a separate DOCUMENT for purposes of these demands.

3. The term "COMMUNICATION" means any oral or written exchange of words, thoughts, or ideas to another person(s), whether person-to-person, in a group, by telephone, by letter, by telex, by facsimile, by legal pleading or by any other process, verbal, written, electric, electronic or otherwise.

4. The terms "DISTRICT," "YOU" and "YOUR" refer to the Los Angeles Unified School District, including any and all of its divisions, departments, affiliates, employees and independent contractors, including but not limited to the Los Angeles School Police Department, Senior High Schools, College Preparatory High Schools and Magnet High Schools.

5. The term "YOU OR ANYONE ACTING ON YOUR BEHALF" includes YOU, YOUR agents, YOUR employees, YOUR supervisors, YOUR managers, YOUR administrators and anyone else acting on behalf of the District.

6. The term "SENIOR HIGH SCHOOLS" refers to all senior high schools, college preparatory high schools and magnet high schools within the jurisdiction of the District.

7. The time frame for each and every DOCUMENT requested shall be July 1, 2002 to the present, including DOCUMENTS referring to policies, procedures, practices or forms created earlier but in effect during this time frame, unless otherwise expressly stated.

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DENIAL OR PARTIAL DENIAL OF THIS REQUEST

For any document or category of documents whose disclosure is denied, please identify all exemptions or exceptions to the CPRA, which, in your opinion, justify denial. Please include a copy of any and all pertinent District policies, practices and/or procedures describing or referring to the basis for such denial. In addition, for each document or category of documents whose disclosure is denied, please identify the Data Owner(s) (as defined by District Bulletin No. 1077 or any superseding District policies, practices and/or procedures concerning information gathering, retention, disclosure or destruction).

REQUESTED CATEGORIES OF DOCUMENTS

Please provide copies of the following categories of documents. Please advise me of any costs associated with this request. You may also contact me if you have questions about this request or if there are alternative ways of securing the requested information that would impose fewer burdens on you or your staff.

1. All documents referring to District policies, practices or procedures for gathering, recording, maintaining, altering and/or destroying information concerning the number, age, race/ethnicity and sex/gender of students who are subject to any form of disciplinary action and/or are cited, arrested or referred to law enforcement officials for alleged misconduct.
2. All documents referring to District policies, practices or procedures for gathering, recording, maintaining, altering and/or destroying information concerning disciplinary action and/or citations/summons and/or tickets issued to students for alleged Truancy or Tardiness, whether authorized by District policies, practices or procedures, Los Angeles Municipal Code section 45.04 or any other legal or regulatory authority.
3. All documents referring to District policies, practices or procedures for determining the allocation or assignment of security personnel, including Los Angeles School Police Department (LASPD) personnel and/or any independent contractors performing the functions of security guards, patrol officers, detectives, or any other security related function, between the various District high schools and/or between the geographic areas/administrative units identified in the organizational chart provided on the LASPD website (www.laspd.org). Please include, by way of example and not limitation, any and all documents indicating permanent or temporary assignments of security personnel (as defined above) to particular District high schools or geographic areas/administrative units within the District. Please

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include job descriptions or other documentation sufficient to determine the rank, title or classification and the job duties of security personnel assigned to the different senior high schools and/or geographic areas/administrative units within the District.

4. All documents relating to the qualifications and training requirements for LASPD personnel employed in each of the following job titles: Chief of Police, Deputy Chief, Lieutenant, Sergeant, Detective, Senior Police Officer and Police Officer. Please include all documents relating to additional qualifications and/or training requirements where applicable as the result of assignment to any of the following duties or units: Campus Police Officer, Patrol Officer, Field Training Officer, Criminal Investigation Section, Canine Unit, Special Investigation Section, Special Problems Unit, Traffic Enforcement Unit or Special Response Team.
5. All documents sufficient to identify the numerical breakdown of LASPD personnel by race/ethnicity, age and sex/gender in the following duties and/or units: Campus Police Officer, Patrol Officer, Field Training Officer, Criminal Investigation Section, Canine Unit, Special Investigation Section, Special Problems Unit, Traffic Enforcement Unit or Special Response Team.
6. All documents from FY 2002 to the present, including but not limited to pertinent sections of the District's annual budgets, indicating the amount of funds allocated for security, policing, or law enforcement purposes at District senior high schools, including, where available, documents indicating itemized allocations for security expenses (e.g., personnel, equipment, capital costs, etc.).
7. All documents advising District personnel, including LASPD personnel, of the District's policies, practices or procedures for arresting, detaining, interrogating, investigating and/or disciplining District high school students for allegations of criminal conduct.
8. All documents relating to District policies, procedures or practices for notifying the parents or legal guardians of District high school students subjected to interrogation by LASPD, LAPD and/or any other law enforcement personnel.
9. All documents relating to the authorization of District personnel, including but not limited to LASPD personnel, to prepare, enter, access, record, save, alter or delete information in COMPSTAT and/or any other criminal or gang-related information data base

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maintained by the Los Angeles Police Department (LAPD), the Los Angeles Sheriff's Department (LASD) and/or any other law enforcement agency.

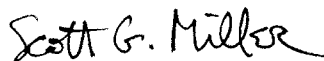
10. All documents relating to District policies, procedures or practices for the use of force, including non-lethal and lethal force, by District personnel in arresting or detaining District high school students.

11. All documents relating to District policies, procedures or practices for reviewing complaints of any kind against District personnel by District high school students and/or the parents or legal guardians of District high school students alleging the use of excessive force, unfair treatment, harassment or bias based on any legally protected category, including but not limited to, race/ethnicity, national origin, disability, sex/gender and/or religion.

12. All documents relating to complaints again of any kind against District personnel by District high school students and/or the parents or legal guardians of District high school students alleging the use of excessive force, unfair treatment, discrimination, harassment, or bias based on any legally protected category, including but not limited to, race/ethnicity, national origin, disability, sex/gender, and/or religion.

13. All documents relating to "zero tolerance" disciplinary policies, procedures or practices affecting District high school students and/or that define the forms of misconduct encompassed by "zero tolerance" disciplinary policies, procedures or practices.

Sincerely,



Scott G. Miller
SBN 255243
3699 Wilshire Blvd., #1200
Los Angeles, CA 90010

cc: Damon Azali-Rojas
Manuel Criollo

Transmission Report

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Abbreviations:

HS: Host send
HR: Host receive
WS: Waiting send

PL: Polled local
PR: Polled remote
MS: Mailbox save

MP: Mailbox print
CP: Completed
FA: Fall

TU: Terminated by user
TS: Terminated by system
RP: Report

G3: Group 3
EC: Error Correct