

October 24, 2013

Jocelyn Samuels  
Acting Assistant Attorney General  
United States Department of Justice, Civil Rights Division  
950 Pennsylvania Avenue, N.W.  
Office of the Assistant Attorney General, Main  
Washington, D.C. 20530

Jonathan M. Smith  
Chief, Special Litigation Section  
United States Department of Justice, Civil Rights Division  
950 Pennsylvania Avenue, N.W. Special Litigation Section  
Washington, D.C. 20530

Dear Acting Assistant Attorney General Samuels and Section Chief Smith:

The undersigned civil rights, faith, community, and advocacy groups request that the Civil Rights Division of the Department of Justice commence a prompt investigation under 42 U.S.C. § 14141 into the New York City Police Department's ("NYPD") discriminatory surveillance of American Muslim communities.

As shown by the NYPD's own documents, for over a decade, the Department has engaged in unlawful religious profiling and suspicionless surveillance of Muslims in New York City (and beyond). This surveillance is based on the false and unconstitutional premise, reflected in the NYPD's published "radicalization" theory, that Muslim religious belief, practices, and community engagement are grounds for law enforcement scrutiny. That is a premise rooted in ignorance and bias: it is wrong and unfairly stigmatizes Muslims, who are a law-abiding, diverse, and integral part of our nation and New York City. Unsurprisingly, the NYPD's surveillance program has had far-reaching, deeply negative effects on Muslims' constitutional rights by chilling speech and religious practice and harming religious goals and missions. It has frayed the social fabric of Muslim communities by breeding anxiety, distrust, and fear. The NYPD's biased policing practices hurt not only Muslims, but all communities who rightfully expect that law enforcement will serve and protect America's diverse population equally, without discrimination.

Under the Violent Crime Control and Law Enforcement Act of 1994 § 210401, the United States Attorney General is authorized to conduct investigations concerning "a pattern or practice of conduct by law enforcement officers . . . that deprives persons of rights, privileges, or immunities secured or protected by the Constitution or laws of the United States." 42 U.S.C. § 14141(a). Where there is reasonable cause to believe that such a pattern or practice has occurred, the Attorney General may pursue equitable and declaratory relief in a civil action. *Id.* § 14141(b).<sup>1</sup> A Department of Justice investigation is warranted here: the attached appendix details the NYPD's unlawful policies and practices and their resulting harms to Muslims.

---

<sup>1</sup> See also 42 U.S.C. § 3789d(c) (authorizing the Attorney General to bring a civil action where there is reason to believe that a unit of local government receiving federal funds discriminates on the basis of religion).

We respectfully request that the Civil Rights Division promptly investigate the NYPD's unconstitutional program of religious profiling and suspicionless surveillance of Muslims.

Sincerely,

National Organizations

Advocacy for Justice and Peace Committee of the Sisters of St. Francis of Philadelphia  
American Civil Liberties Union  
American Humanist Association  
American-Arab Anti-Discrimination Committee (ADC)  
Americans United for Separation of Church and State  
Arab American Institute  
Asian American Legal Defense and Education Fund  
Asian Americans Advancing Justice - AAJC  
Asian Americans Advancing Justice - Asian Law Caucus  
Asian Americans Advancing Justice - Los Angeles  
Baptist Joint Committee for Religious Liberty  
Bill of Rights Defense Committee  
Blacks in Law Enforcement of America  
Center for Constitutional Rights (CCR)  
Center for Inquiry  
Center for National Security Studies  
Center for New Community  
Council on American Islamic Relations (CAIR)  
Defending Dissent Foundation  
Foundation for Ethnic Understanding  
Franciscan Action Network  
Groundswell, Auburn Seminary  
Hindu American Foundation  
Hmong National Development, Inc.  
Interfaith Alliance  
International Center for Advocates Against Discrimination (ICAAD)  
Justice Strategies  
KARAMAH: Muslim Women Lawyers for Human Rights  
Muslim Advocates  
Muslim Alliance of North America (MANA)  
Muslim Public Affairs Council  
NAACP  
National Asian Pacific American Women's Forum (NAPAWF)  
National Council of Jewish Women  
National Gay and Lesbian Task Force  
National Immigration Project

National Network for Arab American Communities (NNAAC)  
National Religious Campaign Against Torture  
New Evangelical Partnership for the Common Good  
People For the American Way Foundation  
Presbyterian Church (U.S.A.)  
Public Policy Advocacy Network of the Synod of the Northeast (Presbyterian Church USA)  
Rights Working Group  
Sikh American Legal Defense and Education Fund (SALDEF)  
South Asian Americans Leading Together (SAALT)  
The Leadership Conference on Civil and Human Rights  
The Sikh Coalition  
T'ruah: The Rabbinic Call for Human Rights  
United Church of Christ - Justice and Witness Ministries  
United Methodist Church, General Board of Church and Society  
USPAK Foundation

#### State Organizations

A Better Way Foundation  
American Center for Outreach  
American Muslim Advisory Council (AMACTN)  
Arab Community Center for Economic and Social Services (ACCESS)  
Arkansas Interfaith Alliance  
Asian Americans Advancing Justice-Chicago  
Asian Pacific American Affairs Commission  
CAIR - Michigan Chapter  
CAIR-CT  
Center for Intercultural Organizing  
Civic Trust Public Lobbying Company  
Council on American Islamic Relations-Texas, Dallas Fort Worth  
Council on American-Islamic Relations in New Jersey  
Council on American-Islamic Relations of Washington State (CAIR-WA)  
Georgia Association of Muslim Lawyers  
Interfaith Action for Human Rights  
Muslim Bar Association of New York  
New England Muslim Bar Association  
New England Synod - ELCA  
New Jersey Muslim Lawyers Association  
New York Civil Liberties Union  
New York Immigration Coalition  
North Carolina Justice Center  
Raksha, Inc  
South Asian Bar Association of Arizona

Tennessee Immigrant and Refugee Rights Coalition  
The Council on American Islamic Relations of New York (CAIR-NY)  
VOCAL New York

Local Organizations

Access California Services  
Adhikaar  
Arab American Action Network (AAAN)  
Arab American Association of New York  
Arab Muslim American Federation - New York  
ASHA for Women  
Asian Law Alliance  
Asian Pacific Community in Action  
CAAAY Organizing Asian Communities  
Capital Area Muslim Bar Association  
Committee Against Anti-Asian Violence (CAAAY Organizing Asian Communities)  
Communities United for Police Reform (CPR)  
Creating Law Enforcement Accountability & Responsibility Project  
DRUM - Desis Rising Up & Moving  
FIERCE  
Interfaith Alliance, Long Island Chapter  
Interfaith Center of New York  
Interfaith Communities United for Justice and Peace  
Islamic Leadership Council of Metropolitan New York  
Jewish Voice for Peace - New York City Chapter  
Jews Against Islamophobia Coalition  
Jews for Racial & Economic Justice  
Jews Say No!  
Justice Committee  
JVP-Westchester  
Metropolitan New York Synod  
Mosque of Islamic Brotherhood (MIB)  
Muslim American Civil Liberties Coalition (MACLC)  
Muslim Bar Association of Chicago  
Muslim Bar Association of Southern California  
Muslim Consultative Network  
New York City Anti-Violence Project  
New York Harm Reduction Educators (NYHRE)  
One America  
South Asian Bar Association of Northern California  
The Arab American Family Support Center  
The Interfaith Alliance - Long Island Chapter  
The Interfaith Alliance of Rochester

The Legal Aid Society  
The Public Science Project  
Tulsa Interfaith Alliance  
Turning Point for Women and Families  
VOCAL-NY  
Westchester Coalition Against Islamophobia  
Westchester Martin Luther King, Jr. Institute for Nonviolence  
Women In Islam, Inc.

## APPENDIX

### I. Introduction

Since 2002, the NYPD has engaged in a pattern and practice of religious profiling and suspicionless surveillance of Muslims throughout the Northeast that continues to this day. The NYPD's surveillance program is based on the false and unconstitutional premise that Muslim religious belief, practices, and community engagement are grounds for law enforcement scrutiny. That is a premise rooted in ignorance and bias: it is wrong and unfair to the millions of American Muslims who are a law-abiding, diverse, and integral part of our nation and New York City. Biased policing policies and practices harm not only targeted minorities, but all communities who rightfully expect that law enforcement will serve and protect America's diverse population equally, without discrimination.

New York's Muslim communities have long been aware of the NYPD's unjustified surveillance. Their experiences and fears have been confirmed by investigative reporting based on the NYPD's own documents, which reveal that the Department has singled out Muslim religious and community leaders, mosques, organizations, businesses, and individuals for pervasive surveillance that is not visited upon the public at large or upon those belonging to any other faith.<sup>1</sup> As detailed below, the NYPD has mapped Muslim communities and their religious, educational, and social institutions and businesses in New York City (and beyond). It has deployed NYPD officers and informants to infiltrate mosques and other institutions to monitor the conversations of Muslims based on their religion and without any suspicion of wrongdoing. It has even designated entire mosques as "terrorism enterprises," claiming the authority to conduct wholesale, years-long investigations into mosques' religious leaders, congregants, and religious and community activities.<sup>2</sup> And it has conducted other forms of suspicionless surveillance of innocent Muslims, including the monitoring of websites, blogs, and online forums. The results of these unlawful spying activities are entered into NYPD intelligence databases, which have amassed information about thousands of law-abiding Americans.

The scale of these unconstitutional and invasive practices is vast. At the same time, no mosque or Muslim community organization has been charged with terrorism by the NYPD, and a police representative has admitted that the NYPD's mapping activities have not generated a single lead or resulted in even one terrorism investigation.<sup>3</sup>

The NYPD's pattern and practice of discriminatory surveillance warrants a Department of Justice investigation. Under the Violent Crime Control and Law Enforcement Act of 1994 § 210401, the United States Attorney General is authorized to conduct investigations concerning "a pattern or practice of conduct by law enforcement officers . . . that deprives persons of rights, privileges, or immunities secured or protected by the Constitution or laws of the United States." 42 U.S.C. § 14141(a). Where there is reasonable cause to believe that such a pattern or practice has occurred, the Attorney General may pursue equitable and declaratory relief in a civil action. Id. § 14141(b).<sup>4</sup> As detailed below, the NYPD's own documents show that the Department has engaged in a pattern and practice of discriminatory surveillance in violation of the Fourteenth Amendment's Equal Protection Clause and the First Amendment's right to the free exercise of religion and guarantee of neutrality toward all religions.

## **II. The NYPD's Pattern and Practice of Discriminatory Surveillance**

### **A. The NYPD's Discriminatory "Radicalization" Theory**

The analytic underpinnings of the NYPD's unconstitutional religious profiling are reflected in a 2007 report titled "Radicalization in the West: The Homegrown Threat," written by two senior analysts in the NYPD Intelligence Division, and published by the NYPD (the "NYPD Radicalization Report"). The NYPD Radicalization Report claims to identify a linear, four-stage "radicalization process" by which individuals transform into terrorists.<sup>5</sup> The process laid out in the NYPD Radicalization Report draws a broad profile and treats with suspicion those who identify as Muslim, harbor Islamic beliefs, or engage in Islamic practices.

According to the NYPD Radicalization Report, "[e]nclaves of ethnic populations that are largely Muslim often serve as 'ideological sanctuaries' for the seeds of radical thought."<sup>6</sup> Within these "Muslim enclaves," the report claims that potential terrorists could range from members of middle-class families to "successful college students, the unemployed, the second and third generation, new immigrants, petty criminals, and prison parolees."<sup>7</sup> It identifies as so-called "radicalization incubators" places frequented by Muslims, including mosques, "cafes, cab driver hangouts, flophouses, . . . student associations, non-governmental organizations, hookah (water pipe) bars, butcher shops and book stores."<sup>8</sup> It also purports to identify as radicalization "indicators" First Amendment-protected activities in which many, if not most, religious Muslims participate—including "wearing traditional Islamic clothing [and] growing a beard," abstaining from alcohol, and "[b]ecoming involved in social activism and community issues."<sup>9</sup>

The NYPD Radicalization Report stigmatizes an entire faith community and invites discrimination. It specifically singles out Muslims for profiling and suspicionless surveillance because of their religious beliefs and practices. Although the NYPD claimed in 2009 that its Radicalization Report "was not intended to be policy prescriptive,"<sup>10</sup> the NYPD Intelligence Division continues to conduct suspicionless surveillance of Muslims in accordance with the biased and unjustified assumptions set out in the report.

### **B. The NYPD's Unlawful Mapping and Surveillance of Law-Abiding Muslims**

The NYPD's own documents show that, beginning in at least 2003, its Intelligence Division carried out a pattern and practice of unlawful surveillance by identifying, locating, and mapping Muslims based on a list of "ancestries of interest," including African-American Muslims and those from majority Muslim countries.<sup>11</sup>

The NYPD's mapping efforts specifically excluded non-Muslims from police scrutiny. For example, in a report mapping the Egyptian community in 2007, the NYPD noted that Coptic Christian Egyptians were "the majority of the Egyptian community in New York City," but excluded Coptic Egyptians from the report.<sup>12</sup> In its 2007 map of the Syrian community in New York City, the NYPD stated that the community is "divided into two parts, a Jewish Syrian and a Muslim Syrian community with the Jewish community being the larger of the two. This report will focus on the smaller Muslim community."<sup>13</sup> Similarly, the NYPD's Demographics Report

on Albanians acknowledged the religious diversity in New York's Albanian population, but police officials only mapped and photographed Albanian mosques for the report.<sup>14</sup>

As part of this surveillance program, the NYPD has dispatched teams of plainclothes officers known as “rakers” into neighborhoods with concentrated communities associated with Muslim “ancestries of interest” to monitor daily life in those communities.<sup>15</sup> It has also engaged informants to conduct suspicionless surveillance of Muslims.<sup>16</sup> Recently, the commanding officer of the NYPD's Intelligence Division stated that members of the Division may be instructed to record and report on Muslim New Yorkers' conversations to determine whether they are “upset” about world events, such as “a drone attack,” or discussing information that would “identify what religion or what type of people they are.”<sup>17</sup>

Although the NYPD's dragnet program of suspicionless surveillance has swept up Muslims as a faith community, the NYPD has further singled out specific individuals, organizations and groups because of real or perceived stronger devotion to their faith or to particular beliefs.<sup>18</sup> For example, the NYPD has sent officers and informants to spy on “hot spots” that were particularly identified as having a “devout crowd.”<sup>19</sup> The NYPD has also singled out for suspicionless surveillance Muslim religious institutions and leaders it perceives as particularly influential in the community.<sup>20</sup>

Among the institutions on which the NYPD has specifically focused its suspicionless surveillance are mosques, which are central to Muslim religious life. The NYPD identified and mapped more than 250 area mosques in New York and neighboring states.<sup>21</sup> NYPD officials then determined the “ethnic orientation, leadership, and group affiliations” of each mosque, either by surveilling it from the outside or by entering the mosque to make those determinations.<sup>22</sup> Using rakers and informants, the NYPD identified fifty-three “mosques of concern” in which the Department placed additional informants and plainclothes officers.<sup>23</sup> Informants known informally as “mosque crawlers” have also been dispatched to monitor sermons, scrutinize imams, record conversations, and collect lists of mosque attendees.<sup>24</sup> The NYPD's own documents show that informants have recorded conversations among mosque congregants about current events.<sup>25</sup> Moreover, the NYPD has placed video cameras outside of mosques to monitor congregants, and it has collected license plate numbers of those attending certain mosques and religious conferences—again, without suspicion of criminal activity.<sup>26</sup>

To facilitate the blanket and invasive surveillance of at least a dozen mosques, the NYPD even classified them in their entirety as “terrorism enterprises.” None of these mosques has ever been charged with terrorism, but the NYPD opened often years-long “terrorism enterprise investigations” into them. Under this designation, the NYPD claims the authority to conduct investigations—which may include the use of informants—into religious leaders, congregants, and their religious and community activities.<sup>27</sup>

The NYPD also sought to place informants in leadership positions at mosques and community organizations, including the Arab American Association of New York, a secular social-service organization that helps new immigrants adjust to life in the United States.<sup>28</sup> In addition, the NYPD has monitored Muslim Student Association (“MSA”) websites on a daily basis, recording the names of members—students not accused of any wrongdoing—in reports prepared for Police



Commissioner Raymond Kelly.<sup>29</sup> The NYPD also placed informants or undercover officers in Muslim Student Associations at colleges throughout New York.<sup>30</sup> NYPD undercover officers have reported on students' prayer schedule and religious conversations.<sup>31</sup>

Through the NYPD's discriminatory surveillance practices, the names of thousands of innocent Muslims in New York, New Jersey, Connecticut, and Pennsylvania have been placed in secret police files, absent evidence that they engaged in criminal activity.<sup>32</sup>

### **III. Harms to Muslims and Muslim Communities as a Result of NYPD Surveillance**

As a result of the NYPD's pattern and practice of unlawful spying, the religious goals, missions, and practices of Muslims have been profoundly harmed; speech and religious practice have been chilled; and the social fabric of Muslim communities has been damaged by anxiety, distrust, and fear:

- **Religious leadership:** The NYPD's monitoring of mosques has forced religious leaders to censor what they say to their congregants for fear that their statements could be taken out of context by police officers or informants, resulting in further unjustified scrutiny, or worse. This has led imams to curtail the personal and religious counseling they would otherwise provide. Some religious leaders have felt the need to regularly record their sermons to defend themselves against potential mischaracterizations. In sum, religious leaders' ministry, expression, and study have been significantly chilled.
- **Mosques:** Knowledge and fear of NYPD surveillance have diminished attendance at mosques. Disruptions resulting from NYPD surveillance have also diverted precious time and resources away from religious education and counseling, both of which are part of mosques' core religious mission. As a result, these houses of worship cannot serve as the places of spiritual refuge and comfort that they are intended to be.<sup>33</sup>
- **Muslim communities:** In addition to generating anxiety and suspicion within mosques, discriminatory surveillance has produced an atmosphere of fear and mistrust within Muslim communities at large. Advocacy organizations have documented pervasive disruptions of community life, as many Muslims suspect their neighbors and friends of taking notes, eavesdropping, and serving as informants or undercover officers.<sup>34</sup> Unlawful profiling has also breached communities' trust in the NYPD.<sup>35</sup>
- **Individual religious practice and speech:** The NYPD's discriminatory surveillance has broadly chilled religious speech and political activism—from engagement in public debates and protests to friendly coffee-house banter. Muslims have also reported feeling pressure to avoid appearing overtly religious—to change, for example, their dress or the length of their beards to minimize the risk of law enforcement scrutiny.<sup>36</sup>
- **Muslim Student Associations (MSA):** Muslim students—who already face surveillance in their neighborhoods and mosques—report that their awareness of surveillance in academic spaces makes them reluctant to engage in political conversations and host political events. NYPD monitoring has led Muslim students to self-censor their

classroom contributions, and certain student groups have instituted a ban on political discussion in MSA spaces, out of fear that these conversations will trigger additional surveillance. On some campuses, surveillance has led to a decline in attendance at MSA-sponsored events. The atmosphere of suspicion and distrust cripples the ability of MSAs to serve as support groups or safe spaces for discussion of a range of issues, including the discriminatory surveillance itself.<sup>37</sup>

As revealed by the NYPD's own internal documents and investigative reporting, no area of Muslim life appears to have been untouched by discriminatory police surveillance. By singling out Muslim communities for law enforcement scrutiny, the NYPD has imposed an unwarranted badge of suspicion and stigma on law-abiding Muslims. These law enforcement practices violate constitutional guarantees of equality, religious freedom, and governmental neutrality toward all religions.

---

<sup>1</sup> See, e.g., Associated Press, Highlights of AP's Pulitzer Prize-winning probe into NYPD intelligence operations, available at <http://www.ap.org/media-center/nypd/investigation>; Matt Apuzzo & Adam Goldman, Document Legend for Enemies Within: Inside the NYPD's Secret Spying Unit and bin Laden's Final Plot Against America, available at [http://enemieswithinbook.com/document\\_legend/](http://enemieswithinbook.com/document_legend/).

<sup>2</sup> See Adam Goldman & Matt Apuzzo, NYPD Designates Mosques as Terrorism Organizations, Associated Press, Aug. 28, 2013, available at <http://bigstory.ap.org/article/nypd-designates-mosques-terrorism-organizations>.

<sup>3</sup> See Goldman & Apuzzo, NYPD Designates Mosques as Terrorism Organizations, Aug. 28, 2013; Thomas Galati Dep. 95–97, 124, June 28, 2012, Ex. 4 to the Decl. of Paul Chevigny, Handschu v. Special Servs. Div., No. 71 Civ. 2203 (CSH) (S.D.N.Y. Feb. 4, 2013), available at [http://www.nyclu.org/files/releases/Handschu\\_Galati\\_6.28.12.pdf](http://www.nyclu.org/files/releases/Handschu_Galati_6.28.12.pdf) (hereinafter “Galati Dep.”).

<sup>4</sup> See also 42 U.S.C. § 3789d(c) (authorizing the Attorney General to bring a civil action where there is reason to believe that a unit of local government receiving federal funds discriminates on the basis of religion).

<sup>5</sup> See Mitchell D. Silber & Arvin Bhatt, Senior Intelligence Analysts, NYPD Intelligence Division, Radicalization in the West: The Homegrown Threat 21 (2007), available at [http://www.nyc.gov/html/nypd/downloads/pdf/public\\_information/NYPD\\_Report-Radicalization\\_in\\_the\\_West.pdf](http://www.nyc.gov/html/nypd/downloads/pdf/public_information/NYPD_Report-Radicalization_in_the_West.pdf).

<sup>6</sup> Id. at 24.

<sup>7</sup> Id.

<sup>8</sup> Id. at 22.

<sup>9</sup> Id. at 33.

<sup>10</sup> See “Statement of Clarification,” id. at 11–12; see also NYPD Statement of Clarification (added, Summer 2009), Muslim American Civil Liberties Coalition for Truth and Justice's Weblog, <http://maclcl.wordpress.com/2009/09/05/nypd-statement-of-clarification-added-summer-2009/>.

<sup>11</sup> See, e.g., NYPD Intelligence Division PowerPoint Presentation, Intelligence Division 18–26, available at <http://enemieswithinbook.com/documents/Analytical%20Units%20PowerPoint.pdf>; Galati Dep. 45.

<sup>12</sup> NYPD Intelligence Division, Demographics Unit, Egyptian Locations of Interest Report 2 (July 7, 2006), available at <http://hosted.ap.org/specials/interactives/documents/nypd/nypd-egypt.pdf>.

- 
- <sup>13</sup> NYPD Intelligence Division, Demographics Unit, Syrian Locations of Concern Report 1, available at <http://hosted.ap.org/specials/interactives/documents/nypd/nypd-syria.pdf>.
- <sup>14</sup> NYPD Intelligence Division, Demographics Unit, Albanian Locations of Concern Report 6–7, 41, available at <http://hosted.ap.org/specials/interactives/documents/nypd/nypd-albania.pdf>.
- <sup>15</sup> See, e.g., PowerPoint Presentation, Intelligence Division 19, 24.
- <sup>16</sup> See, e.g., Matt Apuzzo & Adam Goldman, With CIA help, NYPD moves covertly in Muslim areas, Associated Press, Aug. 23, 2011, available at <http://www.ap.org/Content/AP-in-the-News/2011/With-CIA-help-NYPD-moves-covertly-in-Muslim-areas>.
- <sup>17</sup> Galati Dep. 35–37.
- <sup>18</sup> See, e.g., NYPD, Technical Operations Unit Surveillance Request (Dec. 9, 2008) (requesting surveillance of an individual based on the subject’s “anti-Shia rhetoric” and the fact that he was scheduled to speak at a conference commemorating the death of a relative of the Prophet Mohammad), available at <http://enemieswithinbook.com/documents/Sahibzada%20Surveillance%20Request.pdf>.
- <sup>19</sup> See, e.g., NYPD Intelligence Division, Strategic Posture 2006 39, available at [http://www.nyclu.org/files/releases/Handschu\\_ Exhibit7b\\_%28StrategicPosturedacted%29\\_2.4.13.pdf](http://www.nyclu.org/files/releases/Handschu_ Exhibit7b_%28StrategicPosturedacted%29_2.4.13.pdf); Matt Apuzzo & Adam Goldman, Documents show NY police watched devout Muslims, Associated Press, Sept. 6, 2011, available at <http://www.ap.org/Content/AP-In-The-News/2011/Documents-show-NY-police-watched-devout-Muslims>.
- <sup>20</sup> See, e.g., Muslim American Civil Liberties Coalition, Creating Law Enforcement Accountability & Responsibility, & Asian American Legal Defense and Education Fund, Mapping Muslims: NYPD Spying and its Impact on American Muslims 29 (2013), available at <http://www.law.cuny.edu/academics/clinics/immigration/clear/Mapping-Muslims.pdf>.
- <sup>21</sup> See, e.g., Strategic Posture 2006 6; NYPD, Suffolk County Demographic Report 5–20 (Aug. 3, 2006), available at [http://hosted.ap.org/specials/interactives/documents/nypd/nypd\\_suffolk.pdf](http://hosted.ap.org/specials/interactives/documents/nypd/nypd_suffolk.pdf); NYPD, Nassau County Demographics Report (Feb. 14, 2007), available at [http://hosted.ap.org/specials/interactives/documents/nypd/nypd\\_nassau.pdf](http://hosted.ap.org/specials/interactives/documents/nypd/nypd_nassau.pdf); NYPD Intelligence Division, Demographics Unit, Newark, New Jersey Demographics Report 17–38 (Sept. 25, 2007), available at [http://hosted.ap.org/specials/interactives/documents/nypd/nypd\\_newark.pdf](http://hosted.ap.org/specials/interactives/documents/nypd/nypd_newark.pdf); Adam Goldman & Matt Apuzzo, With cameras, informants, NYPD eyed mosques, Associated Press, Feb. 23, 2012, available at <http://www.ap.org/Content/AP-In-The-News/2012/Newark-mayor-seeks-probe-of-NYPD-Muslim-spying>.
- <sup>22</sup> Strategic Posture 2006 6; see also Galati Dep. 46–48.
- <sup>23</sup> See, e.g., Strategic Posture 2006 6; Galati Dep. 37–40, 45–48, 52; Apuzzo & Goldman, Documents show NY police watched devout Muslims, Sept. 6, 2011.
- <sup>24</sup> See, e.g., Apuzzo & Goldman, With CIA help, NYPD moves covertly in Muslim areas, Aug. 23, 2011; Adam Goldman & Matt Apuzzo, Informant: NYPD paid me to ‘bait’ Muslims, Associated Press, Oct. 23, 2012, available at <http://www.ap.org/Content/AP-In-The-News/2012/Informant-NYPD-paid-me-to-bait-Muslims>.
- <sup>25</sup> See, e.g., NYPD Intelligence Division, Central Analysis Research Unit, Intelligence Note (Feb. 9, 2006), available at [http://hosted.ap.org/specials/interactives/documents/nypd/nypd\\_cartoons.pdf](http://hosted.ap.org/specials/interactives/documents/nypd/nypd_cartoons.pdf); NYPD Intelligence Division, Intelligence Analysis Unit, Intelligence Note (Oct. 16, 2006), available at [http://hosted.ap.org/specials/interactives/documents/nypd/nypd\\_planecrash.pdf](http://hosted.ap.org/specials/interactives/documents/nypd/nypd_planecrash.pdf); Galati Dep. 29–37, 65–70.
- <sup>26</sup> See, e.g., NYPD Intelligence Division, Deputy Commissioner’s Briefing (July 8, 2008), available at [http://enemieswithinbook.com/documents/DCI%20Briefing\\_2008\\_July\\_08.pdf](http://enemieswithinbook.com/documents/DCI%20Briefing_2008_July_08.pdf); NYPD Intelligence Division, Deputy Commissioner’s Briefing (March 9, 2009), available at

---

[http://enemieswithinbook.com/documents/DCI%20Briefing\\_2008\\_March\\_09.pdf](http://enemieswithinbook.com/documents/DCI%20Briefing_2008_March_09.pdf); Pole Camera Report (Nov. 1, 2006), available at [http://enemieswithinbook.com/documents/Pole%20Camera\\_November%202006.pdf](http://enemieswithinbook.com/documents/Pole%20Camera_November%202006.pdf); Pole Camera Report (Oct. 1, 2007), available at [http://enemieswithinbook.com/documents/Pole%20Camera\\_October%202007.pdf](http://enemieswithinbook.com/documents/Pole%20Camera_October%202007.pdf).

<sup>27</sup> See, e.g., NYPD Intelligence Division, Handschu Committee Meeting Minutes (May 12, 2009), available at [http://hosted.ap.org/specials/interactives/documents/nypd/Handschu\\_Minutes.pdf](http://hosted.ap.org/specials/interactives/documents/nypd/Handschu_Minutes.pdf); Goldman & Apuzzo, NYPD Designates Mosques as Terrorism Organizations, Aug. 28, 2013.

<sup>28</sup> See, e.g., Goldman & Apuzzo, NYPD Designates Mosques as Terrorism Organizations, Aug. 28, 2013.

<sup>29</sup> See, e.g., NYPD Intelligence Division, Cyber Intelligence Unit, Weekly MSA Report (Nov. 22, 2006), available at <http://hosted.ap.org/specials/interactives/documents/nypd-msa-report.pdf>; Deputy Commissioner's Briefing (July 8, 2008).

<sup>30</sup> See, e.g., NYPD Intelligence Division, Deputy Commissioner's Briefing (Apr. 25, 2008), available at <http://hosted.ap.org/specials/interactives/documents/nypd/dci-briefing-04252008.pdf>; Strategic Posture 2006 89.

<sup>32</sup> See, e.g., Deputy Commissioner's Briefing (Apr. 25, 2008); Strategic Posture 2006 104–08; Deputy Commissioner's Briefing (July 8, 2008); Adam Goldman & Matt Apuzzo, NYPD docs: 'Focus' scrutiny on Muslim Americans, Associated Press, Mar. 9, 2012, available at <http://www.ap.org/Content/AP-In-The-News/2012/Focus-scrutiny-on-Muslim-Americans>; First Amended Complaint, Hassan v. City of N.Y., No. 2:12-cv-03401-SDW-MCA (D.N.J. Oct. 3, 2012).

<sup>33</sup> See, e.g., Mapping Muslims: NYPD Spying and its Impact on American Muslims 17–18.

<sup>34</sup> See, e.g., Mapping Muslims: NYPD Spying and its Impact on American Muslims 25–31.

<sup>35</sup> See, e.g., Mapping Muslims: NYPD Spying and its Impact on American Muslims 32–38.

<sup>36</sup> See, e.g., Mapping Muslims: NYPD Spying and its Impact on American Muslims 14–17, 20–24.

<sup>37</sup> See, e.g., Mapping Muslims: NYPD Spying and its Impact on American Muslims 39–45.