



March 7, 2012

VIA ELECTRONIC AND FIRST CLASS MAIL

Anne Arundel County Council Chairman Derek Fink and
Members of the Anne Arundel County Council
The Arundel Center
44 Calvert St.
Annapolis, MD 21401

Dear Chairman Fink and Members of the County Council:

AMERICAN CIVIL
LIBERTIES UNION OF
MARYLAND FOUNDATION
3600 CLIPPER MILL ROAD
SUITE 350
BALTIMORE, MD 21211
T/410-889-8555
F/410-366-7838
WWW.ACLU-MD.ORG

FIELD OFFICE
6930 CARROLL AVENUE
SUITE 610
TAKOMA PARK, MD 20912
T/240-274-5295

OFFICERS AND DIRECTORS
SARA N. LOVE
PRESIDENT

SUSAN GOERING
EXECUTIVE DIRECTOR

C. CHRISTOPHER BROWN
GENERAL COUNSEL

I write on behalf of the American Civil Liberties Union of Maryland and Carl O. Snowden, to request that the Anne Arundel County Council undertake an inquiry into allegations that the County Police Department has been misusing its resources, at the behest of Anne Arundel County Executive John Leopold, in ways that infringe upon the political freedoms of law-abiding Marylanders, including Mr. Snowden. As you know, Mr. Leopold was indicted by the State of Maryland on March 2, 2012 on charges of political corruption and misuse of the security detail provided to him through the Anne Arundel County Police Department to arrange sexual liaisons and to investigate and defeat political adversaries. In regard to the latter charges, the indictment states, at paragraph 24:

Leopold directed on-duty executive protection officers to create dossiers on persons he viewed as political challengers, including but not limited to, Joanna Conti and Carl Snowden. The [Executive Protection Officers] did not consider these people to be security risks.

The ACLU and Mr. Snowden are deeply concerned that this misuse of government resources infringes upon the political freedoms of targeted Marylanders – dubbed “enemies” or opponents -- in violation of the Constitution and of Maryland law, enacted in the wake of the Maryland State Police “spying” scandal of 2008, to restrict police from conducting investigations into activities protected by the First Amendment, unless conducted for a legitimate law enforcement purpose. Md. Code Ann., Public Safety Art., §§3-701, *et seq.*

The ACLU and Mr. Snowden are serving upon County Executive Leopold and Police Chief James Weare detailed information requests under the Maryland Public Information Act, demanding disclosure of information concerning improper police activities in connection with Mr. Leopold’s “enemies list”.

While we certainly expect these requests to afford the public greater insight into the extent of the Police Department's activities with respect to Mr. Snowden and others targeted by Mr. Leopold and the police, we think the County Council may be even better positioned to broadly examine legal and ethical violations that may have occurred, given its authority for oversight of the Police Department.

Accordingly, we urge you to undertake such an inquiry, and to make the findings of your inquiry fully available to the public.

Respectfully,

A handwritten signature in black ink, appearing to read "Deborah A. Jeon", written in a cursive style.

Deborah A. Jeon
Legal Director

AMERICAN CIVIL
LIBERTIES UNION OF
MARYLAND

Cc: County Executive John Leopold
Chief James Teare
Jonathan Hodgson, Esq.