AMERICAN OVERSIGHT

June 10, 2025

VIA EMAIL

City of Paramount
City Hall
16400 Colorado Ave.
Paramount, CA 90723
Via Online Portal

Re: Public Records Request

Dear Public Records Officer:

Pursuant to the California Public Records Act, Cal. Gov't Code §§ 7920.000 et seq., American Oversight makes the following request for records.

Requested Records

American Oversight requests that your office produce the following records within ten days:

1. All formal or informal final directives (including informal email communications), guidance, protocol, or policies created by, issued to, or otherwise provided to the Paramount Mayor's Office regarding the deployment of the U.S. Marine Corps and National Guard, as directed by President Trump's June 7, 2025, memorandum "Department of Defense Security for the Protection of Department of Homeland Security Functions."[1]

   This includes, but is not limited to, any directives, guidance, protocol, or policies issued to law enforcement officers regarding interacting with California National Guard officials.

2. All formal or informal final directives (including informal email communications), guidance, protocol, or policies created by, issued to, or otherwise provided to the Paramount Mayor's Office regarding responding to people protesting local immigration enforcement actions and raids, immigration enforcement officials, including Immigration and Customs Enforcement (ICE), and the Trump administration's immigration policies.

[1] *See* Mem. from President Donald J. Trump to Secretary of Defense, Attorney General, and Secretary of Homeland Security, *Department of Defense Security for the Protection of Department of Homeland Security Functions*, June 7, 2025, https://www.whitehouse.gov/presidential-actions/2025/06/department-of-defense-security-for-the-protection-of-department-of-homeland-security-functions/.

This includes, but is not limited to, any directives, guidance, protocol, or policies issued to law enforcement officers regarding use of force or other interactions with civilians protesting.

For both parts of this request, please provide all responsive records from June 5, 2025, through the date the search is conducted.

Please notify American Oversight of any anticipated fees or costs in excess of $100 prior to incurring such costs or fees.

Guidance Regarding the Search & Processing of Requested Records

In connection with its request for records, American Oversight provides the following guidance regarding the scope of the records sought and the search and processing of records:

- Please search all locations and systems likely to have responsive records, regardless of format, medium, or physical characteristics. For instance, if the request seeks "communications," please search all locations likely to contain communications, including relevant hard-copy files, correspondence files, appropriate locations on hard drives and shared drives, emails, text messages or other direct messaging systems (such as iMessage, WhatsApp, Signal, or X (formerly Twitter) direct messages), voicemail messages, instant messaging systems such as Lync or ICQ, and shared messages systems such as Slack.

- In conducting your search, please understand the terms "record," "document," and "information" in their broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind.

- Our request for records includes any attachments to those records or other materials enclosed with those records when they were previously transmitted. To the extent that an email is responsive to our request, our request includes all prior messages sent or received in that email chain, as well as any attachments to the email.

- Please search all relevant records or systems containing records regarding agency business. Do not exclude records regarding agency business contained in files, email accounts, or devices in the personal custody of your officials, such as personal email accounts or text messages.

- If any records are withheld in full or in part, please demonstrate that the record(s) in question are exempt under the express provisions of the California Public Records Act or that the public interest served by not disclosing the record(s) clearly outweighs the public interest served by disclosure of the record(s).[2]

[2] Cal. Gov't Code § 7922.000.

- In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records.[3] If a request is denied in whole, please state specifically why it is not reasonable to segregate portions of the record for release.

- Please take appropriate steps to ensure that records responsive to this request are not deleted by the agency before the completion of processing for this request. If records potentially responsive to this request are likely to be located on systems where they are subject to potential deletion, including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records.

If you have any questions regarding how to construe this request for records or believe that further discussions regarding search and processing would facilitate a more efficient production of records of interest to American Oversight, please do not hesitate to contact American Oversight to discuss this request. American Oversight welcomes an opportunity to discuss its request with you before you undertake your search or incur search or duplication costs. By working together at the outset, American Oversight and your agency can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in an electronic format by email. Alternatively, please provide responsive material in native format or in PDF format on a USB drive. Please send any responsive material being sent by mail to American Oversight, 1030 15th Street NW, Suite B255, Washington, DC 20005. If it will accelerate release of responsive records to American Oversight, please also provide responsive material on a rolling basis.

Conclusion

American Oversight is a 501(c)(3) nonprofit with the mission to promote transparency in government, to educate the public about government activities, and to ensure the accountability of government officials. American Oversight uses the information gathered, and its analysis of it, to educate the public through reports, press releases, or other media. American Oversight also makes materials it gathers available on its public website and promotes their availability on social media platforms, such as Facebook and X (formerly Twitter).[4]

We share a common mission to promote transparency in government. American Oversight looks forward to working with your agency on this request. If you do not

[3] Cal. Gov't Code § 7922.525(b).
[4] American Oversight currently has approximately 16,000 followers on Facebook and 94,600 followers on X (formerly Twitter). American Oversight, Facebook, https://www.facebook.com/weareoversight/ (last visited June 10, 2025); American Oversight (@weareoversight), X (formerly Twitter), https://x.com/weareoversight (last visited June 10, 2025).

understand any part of this request, please contact Danny Martinez at records@americanoversight.org or (202) 897-2465.

Sincerely,

/s/ Danny Martinez
Danny Martinez
on behalf of
American Oversight