



Tennessee

May 21, 2025

Memphis Police Department  
Attn: Records Office  
170 North Main St.  
7th Floor, Suite 7-11  
Memphis, TN 38103  
mpdrecords@memphistn.gov

***Via City of Memphis Open Records Act Portal and Email***

Re: Request for Public Records Pursuant to the Tennessee Public Records Act, Tenn. Code Ann. § 10-7-501, *et seq.*

Dear Custodian of Records,

We write to request records from the Memphis Police Department (“MPD”), *see* Tenn. Code Ann. § 10-7-301(6). This request seeks copies of records concerning MPD’s use of force and stops. To aid us in understanding MPD’s recent practices in these two areas, please provide the following records in accordance with the Tennessee Public Records Act:

1. Response to Resistance Forms for fifty (50) separate incidents that are closest in time to, and predate, April 30, 2025 (*see, e.g.*, MPD Policies and Procedures (“P&P”) 03-010 § 4.12.5),<sup>1</sup> including uses of force by any specialized unit; and any corresponding completed Inspectional Services Bureau review (*see* P&P 03-010 §§ 3.3.1; 4.12.5).
2. Blue Team Incident Reports for fifty (50) separate incidents that are closest in time to, and predate, April 30, 2025, including uses of force by any specialized unit. *See* P&P 03-010 § 4.12.2.
3. Blue Team Pointed Weapon Reports for fifty (50) separate incidents that are closest in time to, and predate, April 30, 2025, including uses of force by any specialized unit. *See* P&P 03-010 § 4.12.2(4).

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<sup>1</sup> All MPD P&P citations refer to the MPD’s Policies and Procedures, available at <https://www.memphispolice.org/policies-and-procedures/>. Capitalized terms used herein but not otherwise defined have the meanings set forth in the MPD’s Policy and Procedure Manual.

4. The fifty (50) reports and memoranda, closest in time to, and predating, April 30, 2025, created when an adult was injured or claimed to have been injured as a result of an officer's use of force, including uses of force by any specialized unit. *See* P&P 03-010 § 4.6.3.
5. The fifty (50) reports and memoranda, closest in time to, and predating, April 30, 2025, created when a juvenile was injured or claimed to have been injured as a result of an officer's use of force, including uses of force by any specialized unit. *See* P&P 03-010 § 4.6.4.
6. Field Investigation Memos for fifty (50) separate incidents that are closest in time to, and predate, April 30, 2025, including those involving any specialized unit. *See* P&P 03-040 § 4.3.2.
7. Annual Use of Force Analyses of Reports for the years 2021, 2022, 2023, and 2024, including but not limited to those required under P&P 03-010 § 4.12.6.
8. Documents sufficient to identify the total number of use of force incidents for the period June 1, 2024, through May 31, 2025, and the total number of each level of force (*e.g.*, Level 1, Level 2, etc.) in that period.
9. MPD's policies, procedures, or rules in effect immediately prior to January 7, 2023, related to (a) use of force; (b) search, seizure, and field interviews; and (c) racial discrimination, racial profiling, or discriminatory law enforcement practices, to the extent they are different from those currently in effect. In the alternative, we would also accept a redline comparing the current and former policies, if available.

For purposes of this request, "records" shall mean "all documents, papers, letters, maps, books, photographs, microfilms, electronic data processing files and output, films, sound recordings, or other material, regardless of physical form or characteristics made or received pursuant to law or ordinance or in connection with the transaction of official business by any governmental agency." Tenn. Code Ann. § 10-7-301(6).

If you claim that any document or portion thereof is exempt from inspection under Tenn. Code Ann. § 10-7-504, or under any other statute or judicial decision, as to each document or portion you claim to be exempt, please state the basis for the exemption in accordance with Tenn. Code Ann. § 10-7-503(a)(2)(B), and identify the document or portion by date; by sender, recipient, or author; and by a description of the contents sufficiently detailed to enable an independent evaluation of the exemption.

If you choose to deny any portion of this request, please note that Tenn. Code Ann. § 10-7-503(a)(2)(B) requires that, within seven (7) business days, you “[d]eny the request in writing or by completing a records request response form developed by the office of open records counsel. The response shall include the basis for the denial.” In accordance with Tenn. Code Ann. § 10-7-504, please identify the specific statutory exception authorizing the withholding of the record and provide a brief explanation of how the exception applies to the record withheld. This request is made with the understanding that, pursuant to Tenn. Code Ann. § 10-7-503(a)(5), you will redact only those portions of records that are specifically exempt from disclosure, and provide an explanation that complies with MPD’s “redaction practices” and policies in accordance with Tenn. Code Ann. § 10-7-503(g)(B). For any redactions, please specify the statutory exemption you are claiming for each instance of redaction, and ensure that the redactions are clearly marked so that they can be distinguished from any blank or missing sections of the record.

Pursuant to state law, **please provide an electronic copy of your responses to this request to Stella Yarbrough at [syarbrough@aclu-tn.org](mailto:syarbrough@aclu-tn.org)**. Arrangements can also be made to supply you with a CD, flash drive, or email address capable of receiving larger quantities of data.

Please notify us if the fees associated with responding to this request will exceed \$100.00 before completing the request. We are available to answer any questions you have about this request and will readily work with you to establish a process for fulfilling this request in an efficient and economical manner. Thank you in advance for your cooperation and attention to this matter, and we look forward to receiving your response.

Sincerely,

Stella Yarbrough  
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American Civil Liberties Union Foundation of Tennessee  
[syarbrough@aclu-tn.org](mailto:syarbrough@aclu-tn.org)  
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