

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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K. DENISE RUCKER KREPP,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 16-0926 (KBJ)
)	
UNITED STATES DEPARTMENT)	
OF JUSTICE,)	
)	
Defendant.)	
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DECLARATION OF PETULA COON

I, Petula Coon declare the following to be a true and correct statement of facts:

1. I am the Supervisor for the Applications and Information Management Unit of the United States Attorney’s Office for the District of Columbia. (“USAO-DC”). I have been in the employ of the Department of Justice, USAO-DC since July 29, 1999. The Applications and Information Management (“AIM”) unit provides systems development and maintenance of all case management and special administrative and statistical applications used in the USAO-DC. I am responsible for managing the design, development, implementation and maintenance of complex case management systems and other Oracle database applications. As such, I am familiar with USAO-DC records system and databases.

2. I make the following statements based upon my personal knowledge, which in turn is based on a personal review of the Freedom of Information Act (“FOIA”) request, official files and records, and correspondence in this case, and upon information furnished to me in the course of my official duties. I have read the complaint filed by the plaintiff in the above-captioned matter, and I am familiar with the efforts of the Department of Justice (“DOJ”)

personnel to process the subject request.

3. The purpose of this declaration is to explain the DOJ's search for records in response to plaintiff's FOIA request made directly to the Department.

4. On November 13, 2015, Plaintiff's request was sent by EOUSA FOIA/PA Staff to the USAO-DC to conduct a search for records responsive to the request.

5. On December 8, 2015, Theresa Jones, the FOIA Coordinator for the USAO-DC, forwarded Plaintiff's FOIA request to me for responsive records.

6. On or about December 15, 2015, I reviewed the requirements for the Plaintiff's FOIA request. After reviewing the requirements, I concluded that the Plaintiff was requesting a report that would display specific statistical information about District of Columbia Superior Court cases that were filed between the years of 2010 and 2015, and were associated with specific arrest charges, prosecutions and plea agreements. It was also my understanding that the Plaintiff was requesting that the generated statistical information be displayed in groups by year of filing, specific arrest charge, and District of Columbia ward area.

7. As a result, I determined that a location which could contain responsive records was the Replicated Criminal Information System ("RCIS"). The RCIS system is the primary case management system used by USAO-DC to store and maintain District of Columbia Superior Court case and arrest-related information. No other system used by the USAO-DC stores arrest or prosecution-related information.

8. The Replicated Criminal Information System ("RCIS") provides case management information for Superior Court cases based on arrests and court data transferred daily to the USAO-DC. The system allows for search capabilities and generates electronic forms for case preparation.

9. Within RCIS, data regarding arrests for types of crime is collected and organized by District of Columbia Police District and Police Service Area (“PSA”) in which the crime occurs.

10. For purposes of policing, the District of Columbia “is divided into seven Police Districts, each of which is further subdivided into seven or more Police Service Areas (PSAs).” [http:// mpdc.dc.gov/page/mpdc-who-we-are](http://mpdc.dc.gov/page/mpdc-who-we-are) (last visited July 21, 2016). See <http://mpdc.dc.gov/page/police-districts-and-police-service-areas> (last visited July 21, 2016).

11. The District of Columbia is divided into eight wards. <http://dccouncil.us/pages/learn-about-wards-and-ancs>. (last visited July 21, 2016). The boundaries of the wards are similar, but not identical to, the Police Districts. See Exhibit A.

12. Being familiar with the types of data that is stored within the RCIS system, I knew that the RCIS system did not store information pertaining to arrest activities within a District of Columbia ward area. Nevertheless, I entered the system to again review the manner in which case information concerning arrests, prosecutions and plea agreements is stored. My review confirmed that case information pertaining to arrests handled by the USAO-DC, is maintained according to the Police District and Police Service Area in which a crime is committed, not by the ward in which a crime is committed.

13. Within RCIS, data regarding prosecutions for types of crime is linked to the data regarding arrests. Therefore, it also is organized by District of Columbia Police District and Police Service Area, not by ward.

14. Within RCIS, there is no flag or tracking indicator for identifying plea agreements. Hence, there is no retrieval method for this information.

15. Therefore, I was unable to retrieve the specific information sought in the FOIA request.

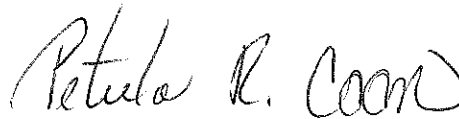
16. On December 15, 2015, I sent emails to the FOIA Coordinator indicating that USAO-DC does not track the requested information by ward. Exhibit B.

17. I am not aware of any other locations or information systems within USAO-DC where records that might be responsive to plaintiff's request are likely to be located because the RCIS system is the primary case management system used by USAO to store and maintain Superior Court case-related information. Furthermore, I am not aware of any other method or means by which a further search could be conducted in RCIS that would likely uncover the responsive records.

18. My search in the RCIS system was reasonably calculated to uncover records responsive to Plaintiff's FOIA request. However, none were located.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the foregoing is true and correct, to the best of my knowledge and belief.

Executed this 29th day of July, 2016.



Petula R. Coon
Petula R. Coon
Supervisor
Applications and Information Management Unit
United States Attorney's Office
for the District of Columbia

**K. DENISE RUCKER KREPP,
Plaintiff**

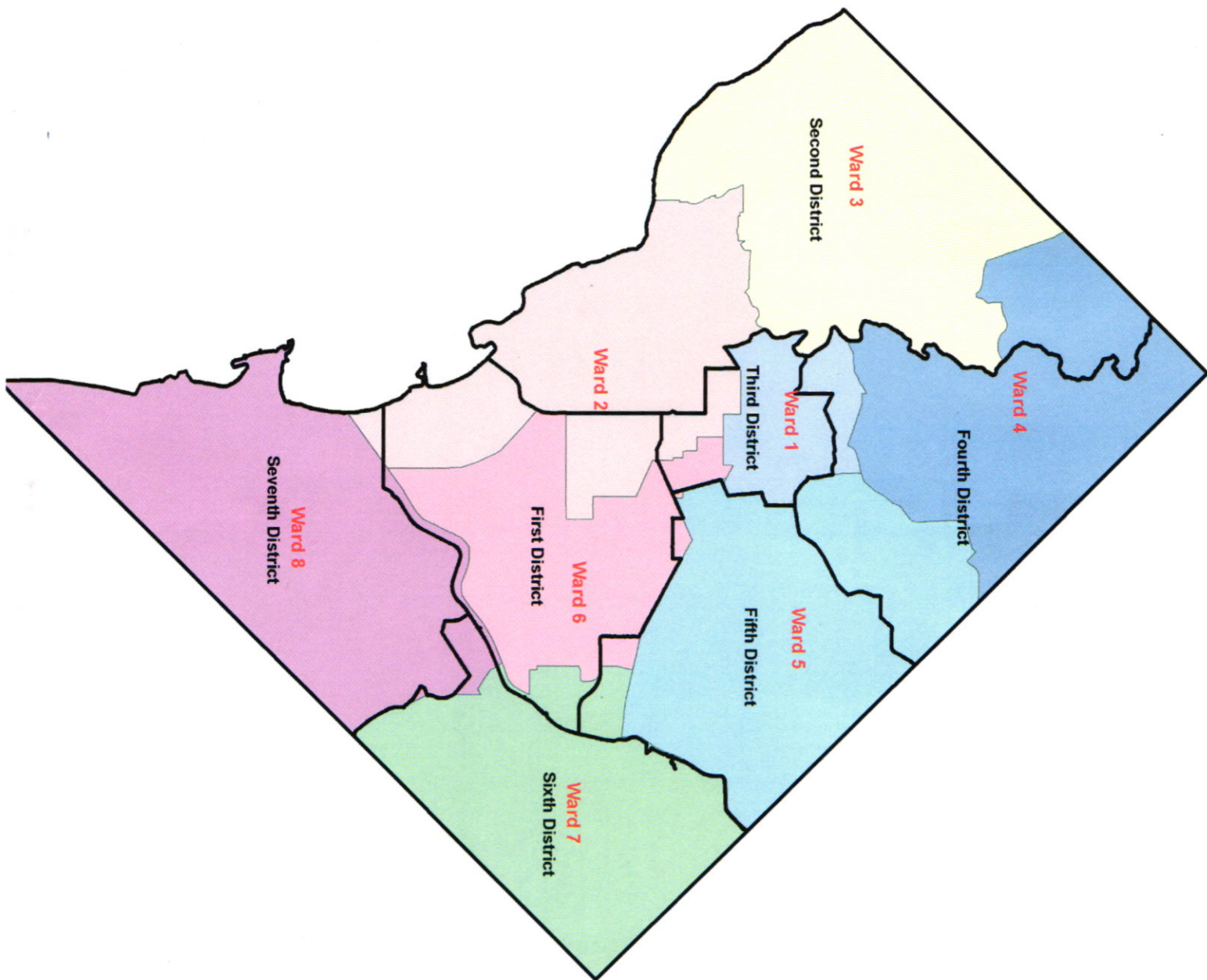
v.

**UNITED STATES DEPARTMENT
OF JUSTICE,
Defendant.**

Civil Action No. 16-0926 (KBJ)

DECLARATION OF PETULA COON

EXHIBIT A



**K. DENISE RUCKER KREPP,
Plaintiff**

v.

**UNITED STATES DEPARTMENT
OF JUSTICE,
Defendant.**

Civil Action No. 16-0926 (KBJ)

DECLARATION OF PETULA COON

EXHIBIT B

From: Coon, Petula (USADC)
Sent: Tuesday, December 15, 2015 1:38 PM
To: Jones, Theresa (USADC)
Subject: RE: FOIA Requests - Statistical reports

Hi Theresa,

After looking at K. Denise Rucker Krepp's request again, I noticed that she wants this information based on ward not district. The MPD information is categorized by District (1-7) not by ward (1-8). I am not able to retrieve the information by ward. Did she mean district?

Petula R. Coon

Supervisor, Applications Information Management Section (AIMS)

United States Attorneys Office, District of Columbia

Petula.Coon@usdoj.gov

ph: (202) 252-0842

Jones, Theresa (USADC)

From: Coon, Petula (USADC)
Sent: Tuesday, December 15, 2015 1:59 PM
To: Jones, Theresa (USADC)
Subject: RE: FOIA Requests - Statistical reports

Hi Theresa,

Also, for request 2016-00356 Krepp, can you check to see if she meant DC Districts (1-7) instead of DC Wards (1-8). If she meant wards, we do not track that information in our systems. We track the district that the arrest and offense occurred.

Please let me know.

Thanks,

Petula R. Coon

Supervisor, Applications Information Management Section (AIMS)

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