

EXHIBIT C



November 20, 2006

ARACELI MARTÍNEZ-OLGUÍN
STAFF ATTORNEY/
WRP FELLOW
T/212.519.7819
F/212.549-2580
amartinez-olguin@aclu.org

FBI Denver
Federal Office Building, Room 1823
1961 Stout Street, 18th. Floor
Denver, Colorado 80294-1823
(303) 629-7171

RE: Freedom of Information Law Request

AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
WOMEN'S RIGHTS PROJECT
NATIONAL OFFICE
125 BROAD STREET, 18TH FL.
NEW YORK, NY 10004-2400
T/212.549.2644
F/212.549.2580
WWW.ACLU.ORG

To Whom It May Concern:

OFFICERS AND DIRECTORS
NADINE STROSSEN
PRESIDENT

ANTHONY D. ROMERO
EXECUTIVE DIRECTOR

HARD ZACKS
ASURER

We write to request the information listed below pursuant to Colo. Rev. Stat. §§ 24-72-201 to 24-72-402. As used herein, "documents" shall mean all memoranda, notes, letters, studies, evaluations, assessments, recommendations, plans, correspondence, minutes, reports, and statistical data, including enclosures and attachments, regardless of the format in which the information is stored.

Specifically, we ask for documents reflecting the following:

1. Any report on failures in the FBI and CBI's firearms purchase tracking procedures on June 22, 1999;
2. Information on firearms purchase tracking procedures of FBI and CBI and which procedures were in effect on June 22 and 23, 1999; and
3. Information on whether family court protective orders, or just criminal court issued protective orders, show up in FBI/CBI databases.

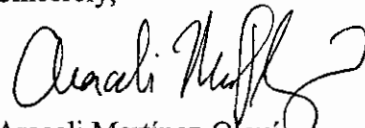
If, for any reason, any portion of this request is denied, please inform us of the reasons for the denial in writing, including reference to the specific statutory exemption(s) upon which you rely, and provide the name and address of the person or body to whom we should direct an appeal.

As provided by the Colorado open records law, we will expect your response within 3 business days. Please send the documents as they become available, if possible, rather than waiting until all records satisfying this request are collected. If it is possible to email any of these documents, please send them to amartinez-olguin@aclu.org.

If the cost of these documents is \$100.00 or less, please send them to us with a bill and itemized receipt attached without informing us beforehand. Otherwise, please advise me of the cost of producing these documents as soon as possible via phone or email.

Thank you in advance for your assistance. Please do not hesitate to contact me at (212) 519-7819 if you have any questions.

Sincerely,



Araceli Martínez-Olguín
Staff Attorney/WRP Fellow

Emily J. Martin
Deputy Director

Lenora M. Lapidus
Director

AMERICAN CIVIL LIBERTIES
UNION FOUNDATION



November 20, 2006

ARACELI MARTÍNEZ-OLGUÍN
STAFF ATTORNEY/
WRP FELLOW
T/212.519.7819
AMERICAN CIVIL LIBERTIES
UNION araceli@aclu.org
WOMEN'S RIGHTS PROJECT
NATIONAL OFFICE
125 BROAD STREET, 18TH FL.
NEW YORK, NY 10004-2400
T/212.549.2644
F/212.549.2580
WWW.ACLU.ORG

OFFICERS AND DIRECTORS
NADINE STROSSEN
PRESIDENT

ANTHONY D. ROMERO
EXECUTIVE DIRECTOR

HARD ZACKS
ASURER

Douglas County Coroner's Office
4000 Justice Way
Castle Rock, CO 80109

RE: Freedom of Information Law Request

To Whom It May Concern:

We write to request the information listed below pursuant to Colo. Rev. Stat. §§ 24-72-201 to 24-72-402. As used herein, "documents" means all memoranda, notes, letters, studies, evaluations, assessments, recommendations, plans, correspondence, minutes, reports, and statistical data, including enclosures and attachments, regardless of the format in which the information is stored.

Specifically, we ask for documents reflecting the Coroner's report and original autopsy information for:

1. Leslie Olivia Gonzales, date of death June 23, 1999;
2. Katheryn Nicole Gonzales, date of death June 23, 1999;
3. Rebecca Lynne Gonzales, date of death June 23, 1999; and
4. Simon James Gonzales, date of death June 23, 1999.

If, for any reason, any portion of this request is denied, please inform us of the reasons for the denial in writing, including reference to the specific statutory exemption(s) upon which you rely, and provide the name and address of the person or body to whom we should direct an appeal.

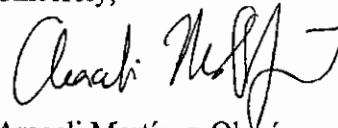
As provided by the Colorado open records law, we will expect your response within 3 business days. Please send the documents as they become available, if possible, rather than waiting until all records satisfying this request are collected. If it is possible to email any of these documents, please send them to amartinez-olguin@aclu.org.

If the cost of these documents is \$100.00 or less, please send them to us with a bill and itemized receipt attached without informing us beforehand.

Otherwise, please advise me of the cost of producing these documents as soon as possible via phone or email.

Thank you in advance for your assistance. Please do not hesitate to contact me at (212) 519-7819 if you have any questions.

Sincerely,



Araceli Martínez-Olguín
Staff Attorney/WRP Fellow

Emily J. Martin
Deputy Director

Lenora M. Lapidus
Director

AMERICAN CIVIL LIBERTIES
UNION FOUNDATION



November 20, 2006

ARACELI MARTÍNEZ-OLGUÍN
STAFF ATTORNEY/
WRP FELLOW
T/212.519.7819
F/212.549-2580
amartinez-olguin@aclu.org

Douglas County District Attorney's Office
4000 Justice Way, Suite 2525A
Castle Rock, CO 80109-7570
(303) 814-7100

RE: Freedom of Information Law Request

AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
WOMEN'S RIGHTS PROJECT
NATIONAL OFFICE
125 BROAD STREET, 18TH FL.
NEW YORK, NY 10004-2400
T/212.549.2644
F/212.549.2580
WWW.ACLU.ORG

OFFICERS AND DIRECTORS
NADINE STROSSEN
PRESIDENT

ANTHONY D. ROMERO
EXECUTIVE DIRECTOR

ARD ZACKS
TREASURER

To Whom It May Concern:

We write to request the information listed below pursuant to Colo. Rev. Stat. §§ 24-72-201 to 24-72-402. As used herein, "documents" shall mean all memoranda, notes, letters, studies, evaluations, assessments, recommendations, plans, correspondence, minutes, reports, and statistical data, including enclosures and attachments, regardless of the format in which the information is stored.

Specifically, we ask for documents reflecting evidence and analysis related to the Jessica Gonzales case, including:

I. DOCUMENTS

1. A full copy of the District Attorney's report and evidentiary support concerning the events of June 22 and 23, 1999 that culminated in the deaths of Simon James Gonzales and Leslie, Rebecca, and Katheryn Gonzales;
2. Photographs and report on damage to Simon Gonzales' truck resulting from the shooting incident that took place outside of Castle Rock Police Department on June 23, 1999;
3. Analysis of shell casings and/or slugs recovered at the scene of the above mentioned shooting incident;
4. Copies of any tapes recovered from the answering machines of Simon Gonzales and/or Rosemary Young;
5. Copies of Rosemary Young's cell phone and home phone call records from midnight on June 22, 1999 to noon on June 23, 1999;
6. Any documentation of the injured child incident referred to on page 3 of the District Attorney's Supplemental Report of July 1, 1999;

7. Any conclusions drawn by the Douglas County District Attorney's office on the movements of Simon James Gonzales between 5:00 p.m. on June 22, 1999 and 4:00 a.m. on June 23, 1999; and

II. INFORMATION

1. A list of any other law enforcement or governmental agencies that were involved in the investigation of the events on June 22 and 23, 1999 that culminated in the deaths of Simon, Leslie, Rebecca, and Katheryn Gonzales.

If, for any reason, any portion of this request is denied, please inform us of the reasons for the denial in writing, including reference to the specific statutory exemption(s) upon which you rely, and provide the name and address of the person or body to whom we should direct an appeal.

As provided by the Colorado open records law, we will expect your response within 3 business days. Please send the documents as they become available, if possible, rather than waiting until all records satisfying this request are collected. If it is possible to email any of these documents, please send them to amartinez-olguin@aclu.org.

If the cost of these documents is \$100.00 or less, please send them to us with a bill and itemized receipt attached without informing us beforehand. Otherwise, please advise me of the cost of producing these documents as soon as possible via phone or email.

Thank you in advance for your assistance. Please do not hesitate to contact me at (212) 519-7819 if you have any questions.

Sincerely,



Araceli Martínez-Olguín
Staff Attorney/WRP Fellow

Emily J. Martin
Deputy Director

Lenora M. Lapidus
Director



November 20, 2006

ARACELI MARTÍNEZ-OLGUÍN
STAFF ATTORNEY/
WRP FELLOW
T/212.519.7819
F/212.549-2580
amartinez-olguin@aclu.org

Castle Rock Police Department
Records Section
100 Perry Street
Castle Rock, CO 80104

RE: Freedom of Information Law Request

AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
WOMEN'S RIGHTS PROJECT
NATIONAL OFFICE
125 BROAD STREET, 18TH FL.
NEW YORK, NY 10004-2400
T/212.549.2644
F/212.549.2580
WWW.ACLU.ORG

OFFICERS AND DIRECTORS
NADINE STROSSEN
PRESIDENT

ANTHONY D. ROMERO
EXECUTIVE DIRECTOR

ARD ZACKS
PRESIDENT

To Whom It May Concern:

We write to request the information listed below pursuant to Colo. Rev. Stat. §§ 24-72-201 to 24-72-402. As used herein, "documents" shall mean all memoranda, notes, letters, studies, evaluations, assessments, recommendations, plans, correspondence, minutes, reports, and statistical data, including enclosures and attachments, regardless of the format in which the information is stored.

Please produce the following documents in the possession, custody and control of the Castle Rock Police Department (CRPD):

I. DOCUMENTS

- 1) Any and all documents relating to Jessica Gonzales, Simon James Gonzales, Rosemary Young and/or Leslie, Katheryn, and Rebecca Gonzales and/or events in connection with any of the above-named individuals on June 22 & 23, 1999, including but not limited to:
 - a. The entire contents of any and all CRPD files on Simon Gonzales' criminal history, the abduction of the Gonzales children by Simon Gonzales, and the shooting death of Simon Gonzales ("the matter"), including, without limitation, any officers' notes;
 - b. Any internal or external investigation of the matter, including but not limited to documents relating to the CBI investigation of the matter;
 - c. All tapes, transcripts, notes or other reproduction of any meeting or conversation concerning Jessica Gonzales, Simon Gonzales, Rosemary Young, and/or Leslie, Katheryn, and Rebecca Gonzales and/or events in connection with any of the above-named individuals on June 22 & 23, 1999; and
 - d. All tapes, transcripts, notes, call logs, and/or other reproduction of any meeting or conversation with or concerning Jessica Gonzales, including, without limitation:

- i. A list of all calls to or from the CRPD – including calls to all emergency and non-emergency phone numbers associated with the CRPD – occurring between May 21, 1999 and June 23, 1999;
 - ii. All telephone conversations between Jessica Gonzales and Cindy Dieck, Patricia Lisk, and Melissa O’Neill, the CRPD Dispatchers, on June 22 and 23, 1999;
 - iii. All conversations between Jessica Gonzales and Officer Brink;
 - iv. All conversations between Jessica Gonzales and Officer Ahlfinger;
 - v. All conversations between Jessica Gonzales and Officer Ruisi; and
 - vi. All interviews of Jessica Gonzales conducted by anyone associated with the CRPD or Douglass County Police Department;
 - e. All tapes, transcripts, notes, call logs, and/or other reproductions of any conversation in which Simon Gonzales participated, including, without limitation:
 - i. A list of all calls to or from the CRPD – including calls to all emergency and non-emergency phone numbers associated with the CRPD – occurring between May 21, 1999 and June 23, 1999; and
 - ii. All telephone conversations between or interviews of Simon Gonzales and anyone associated with the Castle Rock Police Department;
 - f. All tapes, transcripts, notes, call logs, and/or other reproductions of any conversation in which Rosemary Young participated, including, without limitation:
 - i. A list of all calls to or from the CRPD – including calls to all emergency and non-emergency phone numbers associated with the CRPD – occurring between May 21, 1999 and June 23, 1999; and
 - ii. All interviews of Rosemary Young conducted by anyone associated with the Castle Rock Police Department or Douglass County Police Department.
- 2) Any and all documents evidencing or relating to Simon James Gonzales’s criminal record;
- 3) Any and all documents evidencing or relating to Simon James Gonzales’s mental health, including but not limited to the records of any hospital, doctor or psychiatric facility that treated him;

- 4) Any and all evidence and analysis related to the Jessica Gonzales case, including, but not limited to:
 - a. Photographs and report on damage to Simon Gonzales' truck following the shooting incident that took place outside of the CRPD on June 23, 1999;
 - b. Analysis of shell casings and/or slugs recovered at the scene of the above mentioned shooting incident;
 - c. Copies of any tapes recovered from the answering machines of Simon Gonzales and/or Rosemary Young;
 - d. Any documentation of an emergency call to the CRPD concerning an injured child between 5:00 p.m. on June 22, 1999 and 4:00 a.m. on June 23, 1999;
 - e. Any conclusions drawn by the Douglas County District Attorney's office on the movements of Simon James Gonzales between 5:00 p.m. on June 22, 1999 and 4:00 a.m. on June 23, 1999.
- 5) CRPD's call logs, for 911 *and* non-emergency numbers from May 21, 1999 to June 23, 1999;
- 6) CRPD Protocols and/or Training Manuals or other educational and guidance materials concerning:
 - a. Note-taking during interviews of crime victims and in domestic violence cases, and follow-up reports;
 - b. Responding to cases involving domestic violence restraining orders;
 - c. Enforcing domestic violence mandatory arrest laws;
 - d. Responding to reports of Missing Children and Parental Abduction;
 - e. Responding to Domestic Violence Calls;
 - f. Putting out "Attempt to Locates" or "App Points Bulletins";
 - g. Inter-Jurisdictional Police Communications, particularly with respect to Missing Children or Domestic Violence cases;
 - h. Response of dispatchers to calls regarding Missing Children, Domestic Violence, and Repeat Calls from a Reporting Party; and
 - i. CRPD's system for accessing and verifying Restraining Orders.

II. INFORMATION

- 1) A list of any other law enforcement or governmental agencies that were involved in the investigation of the events on June 22 and 23,

1999 that culminated in the deaths of Simon, Leslie, Rebecca, and Katheryn Gonzales.

If, for any reason, any portion of this request is denied, please inform us of the reasons for the denial in writing, including reference to the specific statutory exemption(s) upon which you rely, and provide the name and address of the person or body to whom we should direct an appeal.

As provided by the Colorado open records law, we will expect your response within 3 business days. Please send the documents as they become available, if possible, rather than waiting until all records satisfying this request are collected. If it is possible to email any of these documents, please send them to amartinez-olguin@aclu.org.

AMERICAN CIVIL LIBERTIES
UNION FOUNDATION

If the cost of these documents is \$100.00 or less, please send them to us with a bill and itemized receipt attached without informing us beforehand. Otherwise, please advise me of the cost of producing these documents as soon as possible via phone or email.

Thank you in advance for your assistance. Please do not hesitate to contact me at (212) 519-7819 if you have any questions.

Sincerely,



Araceli Martínez-Olguín
Staff Attorney/WRP Fellow

Emily J. Martin
Deputy Director

Lenora M. Lapidus
Director