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April 9, 2019

Commissioner William Gross
Boston Police Department
One Schroeder Plaza
Roxbury, MA 02120

Dear Commissioner Gross,

On behalf of Muslim Justice League (MJL), I write to reiterate our serious concerns about the Boston Police Department's engagement in the Youth and Police Initiative Plus (YPIP), a countering violent extremism (CVE) program focused on Somali Diaspora youth, premised on an assumption that they are specially at-risk for "violent extremism."¹ We respectfully request and strongly urge that BPD recall its officers from participation in YPIP and avoid involvement in any renewal or expansion of this, or other, CVE programs.

In 2017, representatives of several organizations including MJL met with your predecessor, then-Commissioner Evans. We urged that the Boston Police Department (BPD) — which had submitted a letter in support of YPIP's successful application for a Department of Homeland Security CVE grant — end its involvement in YPIP and avoid involvement in any other CVE program. On June 20, 2017, we collectively sent a letter in follow-up,² detailing our concerns. It explained:

Countering Violent Extremism (CVE) campaigns, while called by many different names, are premised on discredited theories about risk factors that predispose individuals to "extremism."³ CVE, where it has op-

¹ See Police Foundation application for FY 2016 Countering Violent Extremism Grant, titled "Developing Resilience to Violent Extremism in the Boston Somali Community," available at <https://bit.ly/2TD1d09>

² The letter was co-authored by six organizations (Muslim Justice League, American Civil Liberties Union of Massachusetts, Council on American-Islamic Relations Massachusetts, Digital Fourth, Islamic Society of Boston Cultural Center, and Jewish Voice for Peace — Boston) and was subsequently endorsed by a further twenty-five organizations: African Community Economic Development of New England (ACEDONE), American Friends Service Committee, Asian American Resource Workshop, Black & Pink, Boston Workers' Circle for Jewish Culture & Social Justice, Brazilian Women's Group, Chelsea Collaborative, Defending Rights & Dissent (formerly BORDC), Families for Justice as Healing, Harvard Anti-Islamophobia Network, IfNotNow Boston, Jewish Alliance for Law & Social Action, Kavod, Lawyers Committee for Civil Rights, Massachusetts Pirate Party, Massachusetts Refugee and Immigrant Advocacy Coalition (MIRA), National Lawyers Guild-Massachusetts Chapter, No Drones Eastern Mass, No Drug Arrests Collective (NDAC), Stuck on Replay, Student Immigrant Movement (SIM), Suffolk Muslim Law Students Association, Showing Up for Racial Justice (SURJ)-Boston, Unitarian Universalist Massachusetts Action Network, & Unitarian Universalist Service Committee.

³ See, e.g., Matt Apuzzo (New York Times), Who Will Become a Terrorist? Research Yields Few Clues, March 27, 2016, 2 available at: https://www.nytimes.com/2016/03/28/world/europe/mystery-about-who-will-become-a-terrorist-defies-clearanswers.html?_r=1; Murtaza Hussein, Cora Currier and Jana Winter (The Intercept), Is Your Child a Terrorist? U.S. Government Questionnaire Rates Families at Risk for Extremism, February 9, 2015, available at: <https://theintercept.com/2015/02/09/government-develops-questionnaire-see-might-become-terrorist/>; Faiza Patel (Brennan Center for Justice), Rethinking Radicalization, March 8, 2011, available at: <https://www.brennancenter.org/publication/rethinking-radicalization>; Alice Ross (The Guardian), Academics Criticize Anti-radicalisation Strategy in Open Letter, September 28, 2016, available at: <https://www.theguardian.com/uk-news/2016/sep/29/academics-criticise-prevent-anti-radicalisation-strategy-open-letter>; Asim Qureshi (CAGE), The Science of Pre-Crime: The Secret 'Radicalization' Study Underpinning Prevent, 2016, available at: <https://cage.ngo/wp-content/uploads/2016/09/CAGE-Science-Pre-Crime-Report.pdf>. See also Arun Kundnani, Radicalisation: the Journey of a Concept (2012); Race & Class, 54(2), 3–25; available at: <http://journals.sagepub.com/doi/abs/10.1177/0306396812454984>; Letter from Nicole Nguyen & Stacey Krueger, Researchers from the University of Illinois at Chicago, to Members of Congress et al, Concerning the Questionable Use of Academic Research to Support CVE Initiatives, October 5, 2016, available at: <https://www.brennancenter.org/sites/default/files/Nguyen%20Krueger%20WORDE%20final%20%284%29.pdf>;

erated, has not made communities safer but has instead resulted in clear abuses of civil and human rights and chilling of dissent and social services access. Even prior to announcements of a federally-initiated CVE campaign in the US, certain law enforcement community outreach programs focused on Muslim communities were, it was discovered, designed or used for intelligence collection about participants' and other targets' lawful activity.⁴ This reality, combined with widespread experiences of structural discrimination ... have made many Muslims all too aware that they are viewed as members of a suspect community by some law enforcement agencies. Now, CVE programs — through their promotion of discredited theories that purport to link certain communities to "vulnerability" to "extremism" — have foreseeably increased this awareness.

While it is clear CVE and the flawed research on which it is based primarily targets Muslims, we wish to once again emphasize that we do not ask that CVE target additional groups; expanding CVE to additional communities could only multiply its damage. We were dismayed to learn, for example, that a Denver Police Department CVE program⁵ focuses on refugees, LGBTQ groups and Black Lives Matter.⁶ Nor would our concerns about CVE lessen if CVE were called by other names -- as it has been.⁷ Regardless of their name or branding, programs based on discredited theories that assert the existence of identifiable "vulnerabilities" or "risk factors" for "extremism" give credence to implicit biases. Therefore, under any name, these programs are likely to worsen harassment of marginalized communities, suppress open dialogue and dissent, and do lasting harm to society.

The draft application⁸ for CVE funding of YPIP is deeply disquieting in its citing of unsound, stigmatizing premises about Somali youth. For example it asserts: "Research suggests that the interaction of three risk factors increases a Somali male youth's risk for violent extremism -- 1) *unaccountable times and unobserved spaces*; (2) perceived social legitimacy for violent radicalization and terrorist recruitment; and 3) the presence of recruiters and associates." (Emphasis added.) The application elsewhere cites among ostensible "risk factors for teenage boys and young Somali men to be recruited into violent extremism" such factors as "unsafe neighborhoods," "mistrust of law enforcement," "lack of opportunities" and "direct and indirect traumas."

We note that the word that best describes the concept of "unaccountable times and unobserved spaces" is "privacy," and that freedom from arbitrary interference in privacy is a fundamental human right to which Somali youth -- like all persons -- are entitled. The suggestion that privacy, when available to young Somali-Americans, becomes dangerous, has highly troubling implications, particularly when cited in support of a law enforcement outreach program. Moreover, "unsafe neighborhoods," "lack of opportunities" and various traumas are (1) commonly experienced by marginalized communities that face structural discrim-

⁴ See, e.g. Cora Currier (The Intercept), Spies Among Us? How Community Outreach Programs to Muslims Blur Lines 3 Between Outreach and Intelligence, January 21, 2015, available at: <https://theintercept.com/2015/01/21/spies-among-uscommunity-outreach-programs-muslims-blur-lines-outreach-intelligence/>; Michael Price (Brennan Center for Justice), Community Outreach of Intelligence Gathering?, January 29, 2015, available at: <https://www.brennancenter.org/analysis/community-outreach-or-intelligence-gathering>; American Civil Liberties Union, FOIA Documents Show FBI Illegally Collecting Intelligence Under Guise of "Community Outreach," December 1, 2011, available at: <https://www.aclu.org/news/foia-documents-show-fbi-illegally-collecting-intelligence-under-guise-community-outreach>. See also Spencer Ackerman (The Guardian), Documents Support Fears of Muslim Surveillance by Obama-era Program, March 16, 2017, available at: <https://www.theguardian.com/world/2017/mar/16/obama-counteracting-violent-extremism-muslim-surveillance>.

⁵ See Waqas Mirza (MuckRock), Denver Counterterrorism Program Sets Sights on Black Lives Matter, LGBTQ Groups, and 4 Refugees, March 9, 2017, available at: <https://www.muckrock.com/news/archives/2017/mar/09/denvers-counterterrorismBLM/>. (Denver Police Department's CVE grant proposal is linked within article.)

⁶ Black Lives Matter is a collective seeking specific policy changes "[i]n response to the sustained and increasingly visible violence against Black communities." Their platform is available here: <https://policy.m4bl.org/platform/>. We wish to take this opportunity to express our organizations' strong support for Black Lives Matter and its policy platform. We condemn attempts to discredit Black Lives Matter's aims or tactics by characterizing them as "extremist" or otherwise at odds with the public good. Black Lives Matter is pursuing an urgent and necessary campaign to protect human rights and dignity, and its efforts benefit all of society.

⁷ See Associated Press, What's in a Name? Governments Recast Anti-extremism Efforts, August 26, 2016, available at: <https://apnews.com/29e87290d5a74a988cce221ef6a14996/whats-name-governments-recast-anti-extremism-efforts>.

⁸ See public records response containing draft application for Department of Homeland Security "countering violent extremism" grant, and CVE award announcement, for Youth and Police Initiative Plus, available at: <https://www.muslimjusticeleague.org/wp-content/uploads/2017/04/BPD-CVE-grant-public-records-response.pdf>.

ination and (2) problems that must be addressed because they impede individuals' and communities' rights and full participation in society. By contrast, suggesting on the basis of faulty reports that these experiences predispose those who suffer them to "violent extremism" is stigmatizing and wrong, and it represents an extension of these very injustices and traumas.

Finally, we observe that "mistrust of law enforcement" is a common reaction among persons who have experienced or witnessed racial or religious profiling by, or violence at the hands of, law enforcement. Characterizing this sentiment as a risk factor for "violent extremism" is unlikely to foster trust and in fact highly likely to reinforce the sense that law enforcement views one as a threat to be monitored. A better tactic to address mistrust of law enforcement would be the enactment of structural changes to ensure equal protection and full respect for the human and civil rights of all civilians regardless of race, religion or other immutable characteristics.

Since 2017, MJL has become increasingly alarmed about YPIP as we have learned new information. For example, the Somali community liaison for the program withdrew from participation⁹ after seeing the draft surveys for police and youth YPIP participants being developed for use in the program.¹⁰ Nevertheless, following her departure, BPD identified a new Somali community liaison for the program.¹¹ More recently, we learned that there are plans to try to expand YPIP into schools.¹²

YPIP, like many CVE programs, targets Somali Diaspora youth specifically and also harms Muslim communities as a whole. The CVE campaign perpetuates the idea that Muslims may require interventions due to supposedly "extremist" tendencies. It is bolstered with citations to reports that purport to evaluate the causes of "extremism" but in fact regurgitate anti-Muslim biases. In the wake of murders of 50 Muslim worshippers in New Zealand, many American Muslims are experiencing trauma compounded by the reality that racism and anti-Muslim targeting are not merely a problem of individuals' hate but are encouraged at the highest levels of government. Various policies, programs and practices ostensibly aimed at promoting national security — from the Muslim Ban to CVE — treat us as members of a suspect community. We are tired of our communities being treated as threats and wish instead to live in a society that respects the dignity of all its members.

According to public records, the final cohorts of YPIP are expected to meet in late April and/or May, but as mentioned, there are also plans to seek to pilot the program in schools. We once again ask that you please end BPD's participation in YPIP before these final cohorts meet and decline BPD involvement in any expansion or renewal of this or any other CVE program.

Sincerely,

Shannon Al-Wakeel
Executive Director
Muslim Justice League

⁹ She explained, "After reviewing the survey in its entirety, I have made the decision to withdraw from any ongoing and future involvement with CVE initiatives in Boston. ... I cannot in good conscience continue to support any local partnerships with CVE initiatives under the Trump administration." See email of October 11, 2017; Subject: *Re: CVE Instruments*, available at <https://bit.ly/2OSoRnE> (at page 8).

¹⁰ MJL was also deeply troubled by the survey questions, consistent with our distress at the assumptions behind the CVE campaign generally. Among the questions in the draft surveys were, for police officers: "How much support for extremism do you believe there is among Muslims living in the U.S? (A great deal, A fair amount, Not much, or None at all)," and, "How many Muslims in the U.S., if any, are anti-American? (Almost all, About half/some, or Just a few/none)." For youth participants, questions included, "What is your attitude toward Muslim radicalization in general? (Very negative, Negative, Positive, or Very Positive)." These specific questions were eliminated, and some other changes made, before the surveys were finalized. For example, some questions for police centered on "immigrants" and "Muslims" in the draft surveys but were modified to focus on "Somalis" in the final version. The draft surveys are available at: <https://bit.ly/2OSoRnE> (beginning at page 10). Public records containing the final surveys are available at: <https://bit.ly/2TqrXRk>

¹¹ Emails of October 17 - November 5, 2017; Subjects: *CVE; YPI's and Captain Hosein*; and *Grant for dialogues*, available at <https://bit.ly/2OuVQPu> (at pages 14 - 26).

¹² Email of February 27, 2019, Subject: *Re: Upcoming YPI with Somali Youth*, available at: <https://bit.ly/2Ui8VRA> (at page 36)