

Rachael M. Trummel
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April 2, 2025

VIA USPS EXPRESS DELIVERY

Office of the District Attorney for Wyandotte County
and Kansas City, Kansas
Custodian of Records
120 SW 10th Avenue, 2nd Floor
Topeka, Kansas 66612

Re: ***Roc Nation and Midwest Innocence Project's Request for Records Pursuant to Kansas Open Records Act, K.S.A. § 45-215***

Dear Custodian of Records:

On behalf of Roc Nation, LLC and the Midwest Innocence Project, pursuant to the Kansas Open Records Act ("KORA"), KS Stat. § 45-215 *et seq.*, we hereby request copies of the following:

1. With respect to the Community Integrity Unit, also known as the Conviction Integrity Unit, all documents relating to funding requests; allocation, budgeting and expenditure of funds; reporting; accounting; and invoicing.
2. A list of—or, if no "list" exists, documents sufficient to identify—Wyandotte County murder cases that have been dismissed or for which a declaration of *nolle prosequi* has been entered since January 1, 2000.
3. A list of—or, if no "list" exists, documents sufficient to identify—murder cases prosecuted by the Wyandotte County District Attorney's Office between 1975 and 2016 in which Roger Golubski was involved in any way—whether as a police officer, detective, investigator, witness or otherwise, and whether for KCKPD, the Edwardsville Police Department, the State of Kansas or otherwise.
4. All documents relating to former Wyandotte County prosecutor Terra Morehead's conduct as a prosecutor for the State of Kansas or any political subdivisions thereof, that relate to (1) proven or alleged violations of Kansas law by Morehead, (2) any disciplinary investigation or disciplinary action against Morehead (regardless of outcome), (3) any other professional misconduct by Morehead of which you are reasonably on notice.
5. A list of—or, if no "list" exists, documents sufficient to identify—all cases handled by Morehead as a Wyandotte County Assistant District Attorney, whether an adult or juvenile prosecution, a Child in Need of Care (CINC) case, or any other matter in which she appeared on behalf of the State during her tenure in the Wyandotte County District Attorney's Office.

6. A list of—or, if no “list” exists, documents sufficient to identify—each homicide case presented by the KCKPD to the Wyandotte County District Attorney’s Office for review and/or prosecution since January 1, 2012.
7. With respect to the Resolution by the Unified Government Board of Commissioners to fund digitization of all Wyandotte County court case files by the Wyandotte County District Attorney’s Office,
 - a. Documents reflecting or otherwise relating to the disbursement, distribution and/or use of \$1.7 million dollars allocated for file digitization, including bids, invoices, receipts or other records of payment, whether to a business or individual;
 - b. Documents constituting or otherwise reflecting all policies, processes, and procedures relating to the subject file digitization project;
 - c. Documents sufficient to show the status of the subject file digitization project and related project schedule, including, to the extent applicable, by phase or other applicable benchmark, or by the number of total files scanned and files remaining to be scanned;
 - d. Documents relating to the cost of the subject file digitization project, including, without limitation, all documents relating to any request for proposal or other bid process, as well as all related budget and project cost tracking documents;
 - e. Documents constituting or otherwise reflecting reporting and oversight of the file digitization project, including any reports or updates made to the Unified Government; and
 - f. With respect to case files in which Golubski was involved as a member of the KCKPD or Edwardsville Police Department or otherwise as a testifying witness, documents reflecting (1) the status of the digitization of those files and (2) the subsequent review of any such digitized files in connection with any currently ongoing investigation or review.
8. With respect to the Procurement Card (P-Card) Program,
 - a. A list of—or if no list exists, documents sufficient to identify—each employee or agent (whether current or former) of the Wyandotte County District Attorney’s Office to whom a P-Card was issued since January 1, 2015;
 - b. Documents relating to each transaction involving a P-Card issued to a current or former employee or agent of the Wyandotte County District Attorney’s Office since January 1, 2015.
 - c. All policies, procedures, manuals, directives, and training materials relating to the P-Card Program in effect at any time since January 1, 2015;
 - d. Documents relating to inquiries, reviews, investigations, or other internal audits or assessments regarding the unauthorized or unlawful use of P-Cards by, among others, employees and/or agents of the Wyandotte County District Attorney’s Office since January 1, 2015;

- e. Documents relating to any third-party audit, assessment, review or investigation of the P-Card Program, including, without limitation, the assessment conducted in 2002 or any other date by Integrated Public Management Solutions, LLC, Alvarez & Marsal Public Sector Services, LLC, and The Robert Bobb Group, LLC.

We request your response within three business days of the date of this letter, as required by KS Stat. § 45.218. If you object to any of the requests in whole or in part, your response must state in detail the basis for your objection and cite the specific statutory provision on which your objection is based. If you object to any request only in part, you must timely produce all documents responsive to the remainder of the request.

Responsive documents should be provided in electronic form to the extent possible and directed to rtrummel@jenner.com, lrock@jenner.com, klew@jenner.com, and bmurray@jenner.com. Responsive documents that cannot be provided electronically should be provided in hard copy to Jenner & Block LLP, Attention: Kelly Lew, 1099 New York Avenue, NW Suite 900, Washington, D.C. 20001-4412.

These requests seek information concerning efforts by the Wyandotte County District Attorney's Office to examine criminal cases involving former KCKPD officer and investigator Roger Golubski (now deceased) and former Wyandotte County prosecutor Terra Morehead that resulted in wrongful convictions and incarcerations and have otherwise negatively impacted the lives of vulnerable members of the Kansas City community for decades. As such, disclosure is in the public interest; not only will disclosure contribute to the public's understanding of the referenced matters, it will also foster necessary reform and accountability. Accordingly, we also request a waiver of all fees associated with your response.

We appreciate your assistance, and we look forward to your timely response.

Sincerely,

s/Rachael M. Trummel

Rachael M. Trummel

cc: Loreal Rock
Kelly Lew
Brennan Murray
Lindsay Runnels
Cheryl Pilate

Rachael M. Trummel
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rtrummel@jenner.com

April 2, 2025

VIA EMAIL & USPS EXPRESS DELIVERY

Custodian of Records for Kansas City, Kansas Police Department
Kansas City Kansas Police Headquarters
700 Minnesota Avenue
Kansas City, Kansas 66101

Legal Department of the Unified Government of
Wyandotte County/Kansas City, Kansas
Ninth Floor-Municipal Office Building
701 N. 7th St., Suite 318
Kansas City, Kansas 66101

Re: ***Roc Nation and Midwest Innocence Project's Request for Records Pursuant to the
Kansas Open Records Act, K.S.A. § 45-215***

Dear Custodian of Records:

On behalf of Roc Nation, LLC and the Midwest Innocence Project, pursuant to the Kansas Open Records Act ("KORA"), KS Stat. § 45-215 *et seq.*, we hereby request copies of the following records in the possession, custody, or control of the Kansas City, Kansas Police Department ("KCKPD"):

1. All settlement agreements, releases, consent decrees, and judicial and/or administrative orders relating to complaints about alleged misconduct by the KCKPD and/or any of its employees or agents since January 1, 2000.
2. Documents sufficient to show the amounts paid (legal fees and other costs and disbursements) by or on behalf of the Unified Government and/or KCKPD to the law firm of McAnany, Van Cleave & Phillips, P.A. (also known as MVP Law) on an annual basis since January 1, 2013.
3. A list of—or, if no "list" exists, documents sufficient to identify—those KCKPD officers who, at any time from 2000 to the present, were subject to the rule of disclosure in *Brady v. Maryland*, 373 U.S. 83 (1963) or who were prohibited from testifying in a criminal case. Such an officer is sometimes referred to as having been "Giglio'ed," which refers to the required disclosure of potentially impeaching material as set out in *Giglio v. United States*, 405 U.S. 150 (1972).

4. All record retention policies, practices and procedures in effect at KCKPD any time since January 1, 2000 with respect to criminal investigation records, administrative investigation records, and/or internal investigation records.
5. All documents evidencing or otherwise reflecting the destruction of criminal investigation records, administrative investigation records, and internal investigation records pursuant to any applicable KCKPD record retention policy since January 1, 2000.
6. All documents evidencing or otherwise reflecting the destruction of criminal investigation records, administrative investigation records, and internal investigation records in violation of or as an exception to any applicable KCKPD record retention policy since January 1, 2000.
7. A list of—or, if no “list” exists, documents sufficient to identify—(1) each homicide in Wyandotte County from January 1, 2012 and (2) each homicide investigation by KCKPD since January 1, 2013.
8. A list of—or, if no “list” exists, documents sufficient to identify—each homicide case presented by KCKPD to the Wyandotte County District Attorney’s Office for review and/or prosecution since January 1, 2012.
9. With respect to the Procurement Card (P-Card) Program,
 - a. Documents sufficient to identify each employee or agent (whether current or former) of the KCKPD to whom a P-Card was issued since January 1, 2015;
 - b. Documents sufficient to show each transaction involving a P-Card issued to a current or former employee or agent of the KCKPD since January 1, 2020.
 - c. Documents constituting or reflecting the policies, processes, and procedures in effect at any time since January 1, 2015 relating to the P-Card Program, including, without limitation, authorized and unauthorized use of P-Cards;
 - d. Documents constituting or reflecting any inquiries, investigations and/or other reviews concerning the use of P-Cards, including, without limitation, unauthorized or unlawful use of P-Cards by, among others, employees and/or agents of the KCKPD since January 1, 2015;
 - e. Documents concerning any third-party audit or assessment of the P-Card Program, including, without limitation, the assessment conducted in 2002 by Integrated Public Management Solutions, LLC, Alvarez & Marsal Public Sector Services, LLC, and The Robert Bobb Group, LLC.
10. With respect to KCKPD databases and software:
 - a. The Requests for Proposals (RFPs), Requests for Qualifications (RFQs), and contracts pertaining to the creation or maintenance of database(s).
 - b. The data dictionary, glossary of terms, record layout, entity relationship guide, user guide, and any other records that describe the database(s).
 - c. The instruction manual, or any other type of guide, distributed to KCKPD personnel dictating how they should use the database(s).

- d. All documentation that describes the layout of the database's table and fields, and that provides the definitions of any field, names, codes, and abbreviations used in the database.

We request your response within three business days of the date of this letter, as required by KS Stat. § 45.218. If you object to any of the requests in whole or in part, your response must state in detail the basis for your objection and cite the specific statutory provision on which your objection is based. If you object to any request only in part, you must timely produce all documents responsive to the remainder of the request.

Responsive documents should be provided in electronic form to the extent possible and directed to rtrummel@jenner.com, lrock@jenner.com, klew@jenner.com, and bmurray@jenner.com. Responsive documents that cannot be provided electronically should be provided in hard copy to Jenner & Block LLP, Attention: Kelly Lew, 1099 New York Avenue, NW Suite 900, Washington, D.C. 20001-4412.

These requests seek information concerning serious misconduct by members of the KCKPD; the use of public funds to resolve related complaints against the KCKPD or its members; the extent to which homicides, including of marginalized and otherwise vulnerable members of the Kansas City community, are appropriately investigated and prosecuted; KCKPD's retention and/or non-retention of records; and fraud, waste, and abuse in connection with the Kansas Procurement Card ("P-Card") Program. As such, disclosure is in the public interest; not only will disclosure contribute to the public's understanding of the referenced matters, it will foster necessary reform and accountability. Accordingly, we also request a waiver of all fees associated with your response.

We appreciate your assistance, and we look forward to your timely response.

Sincerely,

s/ Rachael M. Trummel

Rachael M. Trummel

cc: Loreal Rock
Kelly Lew
Brennan Murray
Lindsay Runnels
Cheryl Pilate

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April 2, 2025

VIA USPS EXPRESS DELIVERY

Administrative Office
Wyandotte County Sheriff's Office
710 N 7th Street
Kansas City, Kansas 66101

Re: ***Roc Nation and Midwest Innocence Project's Request for Records Pursuant to Kansas Open Records Act, K.S.A. § 45-215***

Dear Custodian of Records:

On behalf of Roc Nation, LLC and the Midwest Innocence Project, pursuant to the Kansas Open Records Act ("KORA"), KS Stat. § 45-215 *et seq.*, we hereby request copies of the following:

- All settlement agreements, releases, stipulations, consent decrees, and judicial and/or administrative orders relating to complaints about alleged misconduct by any member of the Wyandotte County Sheriff's Department, including the Wyandotte County Jail and/or any of their respective employees or agents, since January 1, 2000.

We request your response within three business days of the date of this letter, as required by KS Stat. § 45.218. If you object to any of the requests in whole or in part, your response must state in detail the basis for your objection and cite the specific statutory provision on which your objection is based. If you object to any request only in part, you must timely produce all documents responsive to the remainder of the request.

Responsive documents should be provided in electronic form to the extent possible and directed to rtrummel@jenner.com, lrock@jenner.com, klew@jenner.com, and bmurray@jenner.com. Responsive documents that cannot be provided electronically should be provided in hard copy to Jenner & Block LLP, Attention: Kelly Lew, 1099 New York Avenue, NW Suite 900, Washington, D.C. 20001-4412.

These requests seek information concerning misconduct by the Wyandotte County Sheriff's Department and the Wyandotte County Jail. As such, disclosure is in the public interest; not only will disclosure contribute to the public's understanding of the referenced matters, it will foster necessary reform and accountability. Accordingly, we also request a waiver of all fees associated with your response.

We appreciate your assistance, and we look forward to your timely response.

Sincerely,

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Legal Department of the Unified Government of
Wyandotte County/Kansas City, Kansas
Ninth Floor-Municipal Office Building
701 N. 7th St., Suite 318
Kansas City, Kansas 66101

Re: ***Roc Nation and Midwest Innocence Project's Request for Records Pursuant to Kansas Open Records Act, K.S.A. § 45-215***

Dear Custodian of Records:

On behalf of Roc Nation, LLC and the Midwest Innocence Project, pursuant to the Kansas Open Records Act ("KORA"), KS Stat. § 45-215 *et seq.*, we hereby request copies of the following:

1. Billing records relating to legal services provided to the Unified Government and/or the Kansas City, Kansas Police Department ("KCKPD") by the law firm of McAnany, Van Cleave & Phillips, P.A. (also known as MVP Law) since January 1, 2013.

Note: Privileged information (attorney-client privilege and/or work product) may be redacted if accompanied by an appropriate privilege log, but not the amounts invoiced or paid.

2. Payment records relating to legal services provided to the Unified Government and/or KCKPD by the law firm of McAnany, Van Cleave & Phillips, P.A. (also known as MVP Law) since January 1, 2013.

Note: Privileged information (attorney-client privilege and/or work product) may be redacted if accompanied by an appropriate privilege log, but not the amounts invoiced or paid.

3. A list of—or if no "list" exists, documents sufficient to show—(1) all matters for which the law firm of McAnany, Van Cleave & Phillips, P.A. (also known as MVP Law) appeared as counsel for the Unified Government and/or KCKPD since January 1, 2013; and (2) all other matters for which MVP Law has been retained by the Unified Government and/or KCKPD since January 1, 2013.

4. With respect to the Procurement Card (P-Card) Program,
 - a. A list of—or if no list exists, documents sufficient to identify—each employee or agent (current and former) of the Unified Government to whom a P-Card was issued since January 1, 2015;
 - b. Documents relating to each transaction involving a P-Card issued to a current or former employee or agent of the Unified Government since January 1, 2015.
 - c. All policies, procedures, manuals, directives, and training materials relating to the P-Card Program in effect at any time since January 1, 2015;
 - d. Documents relating to inquiries, reviews, investigations, or other internal audits or assessments regarding the unauthorized or unlawful use of P-Cards by, among others, employees and/or agents of the Unified Government since January 1, 2015;
 - e. Documents relating to any third-party audit, assessment, review or investigation of the P-Card Program, including, without limitation, the assessment conducted in 2002 or any other date by Integrated Public Management Solutions, LLC, Alvarez & Marsal Public Sector Services, LLC, and The Robert Bobb Group, LLC.
5. With respect to the Unified Government’s Law Enforcement Advisory Board (“LEAB”):
 - a. A list of—or if no “list” exists, documents sufficient to show—each member of the LEAB and their respective terms since June 2006;
 - b. Documents relating to appointments to the LEAB and appointees’ period of tenure since June 2006;
 - c. Documents showing the compensation (salary, bonus, and any other good, service, or property of value), if any, received by each member of the LEAB in connection with his or her service on the LEAB since June 2006;
 - d. Meeting minutes of the LEAB since June 2006; and
 - e. Reports issued by the LEAB since June 2006.

We request your response within three business days of the date of this letter, as required by KS Stat. § 45.218. If you object to any of the requests in whole or in part, your response should state in detail the basis for your objection and cite the specific statutory provision on which your objection is based. If you object to any request only in part, you must timely produce all documents responsive to the remainder of the request.

Responsive documents should be provided in electronic form to the extent possible and directed to rtrummel@jenner.com, lrock@jenner.com, klew@jenner.com, and bmurray@jenner.com. Responsive documents that cannot be provided electronically should be provided in hard copy to Jenner & Block LLP, Attention: Kelly Lew, 1099 New York Avenue, NW Suite 900, Washington, D.C. 20001-4412.

These requests seek information concerning efforts by the Unified Government to investigate and advise on existing and potential law enforcement issues, including racial or other biased-based policing; and fraud, waste, and abuse in connection with the Kansas Procurement Card (“P-Card”) Program. As such, disclosure is in the public interest; not only will disclosure contribute to the public’s understanding of the refenced matters, but it will also foster necessary reform and accountability. Accordingly, we also request a waiver of all fees associated with your response.

We appreciate your assistance, and we look forward to your timely response.

Sincerely,

s/ Rachael M. Trummel

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cc: Loreal Rock
Kelly Lew
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Lindsay Runnels
Cheryl Pilate

To the Coroner's Office:

On behalf of Roc Nation, LLC and the Midwest Innocence Project, pursuant to the Kansas Open Records Act ("KORA"), KS Stat. § 45-215 *et seq.*, we hereby request copies of the following records (including preliminary and final findings, as well as all handwritten and electronic notes) pertaining to former KCKPD detective Roger Golubski, who died on or about December 2, 2024:

- Coroner's report on cause and manner of death
- Autopsy report by the doctor/forensic pathologist
- Medicolegal investigator's report
- Toxicology report
- Photographs of the body before and during the autopsy
- Photographs of the body at the scene where it was recovered
- Video of the autopsy
- Diagrams of the body from the autopsy
- Body transport and storage records
- Property sheets and chain of custody documents
- Recordings of all 911 calls in connection with Golubski's death
- Photographs of the gun recovered from the scene of death
- Investigative reports pertaining to the gun recovered from the scene of death and efforts to trace it
- Recovered suicide notes left by Golubski
- Statements by neighbors who heard or witnessed anything in connection with Golubski's death
- First responder reports and investigative reports
- Emails regarding Golubski's death and the investigation of his death
- Copies of any subpoenas issued or received in connection with the investigation of Golubski's death

We respectfully request your response within three business days of the date of this request, as required by KS Stat. § 45.218. If you object to any of the individual requests in whole or in part, your response should state in detail the basis for your objection and cite the specific statutory provision on which your objection is based. If you object to any request only in part, please timely produce all documents responsive to the remainder of the request.

Responsive documents should be provided in electronic form to the extent possible and directed to rtrummel@jenner.com, lrock@jenner.com, klew@jenner.com, and bmurray@jenner.com. Responsive documents that cannot be provided electronically should be provided in hard copy to Jenner & Block LLP, Attention: Kelly Lew, 1099 New York Avenue, NW Suite 900, Washington, D.C. 20001-4412.

We appreciate your assistance, and we look forward to your timely response.

Best,
Loreal Rock
Counsel for Roc Nation, LLC and the Midwest Innocence Project