

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

SURVEILLANCE TECHNOLOGY
OVERSIGHT PROJECT, INC.,

Petitioner,

For a Judgment Pursuant to Article 78 of the
Civil Practice Law and Rules

– against –

NEW YORK CITY POLICE DEPARTMENT,
and JORDAN S. MAZUR in his official
capacity as Records Access Appeals Officer,

Respondents.

**AFFIRMATION OF JEREMY
FEIGELSON IN SUPPORT OF
ARTICLE 78 PETITION**

Index No. 158227/2020

Motion Sequence No. 1

I, JEREMY FEIGELSON, an attorney admitted to practice before the courts of the State of New York, affirm under penalty of perjury as follows:

1. I am a member of the law firm of Debevoise & Plimpton LLP, counsel for the Surveillance Technology Oversight Project, Inc. (“S.T.O.P.” or “Petitioner”) in the above-captioned action. I am familiar with the facts and circumstances described in this affirmation. I respectfully submit this affirmation in support of Petitioner’s Verified Article 78 Petition challenging the determination of Jordan S. Mazur, New York Police Department (“NYPD”) Records Access Appeals Officer, concerning requests submitted by S.T.O.P. pursuant to New York’s Freedom of Information Law (“FOIL”).

2. A true and correct copy of Petitioner's FOIL request submitted to the NYPD, dated November 26, 2019, is attached hereto as **Exhibit 1**.

3. A true and correct copy of Petitioner's FOIL request submitted to the New York City Comptroller's Office, dated November 26, 2019, is attached hereto as **Exhibit 2**.

4. A true and correct copy of Petitioner's FOIL request to the New York City Mayor's Office of Criminal Justice, dated November 26, 2019, is attached hereto as **Exhibit 3**.

5. A true and correct copy of the NYPD's denial of Petitioner's FOIL request, dated January 13, 2020, is attached hereto as **Exhibit 4**.

6. A true and correct copy of the contract entered into between the NYPD and Elucid, Inc., dated January 15, 2020, provided to Petitioner by the New York City Comptroller's Office, is attached hereto as **Exhibit 5**.

7. A true and correct copy of Petitioner's appeal of the NYPD's denial of Petitioner's FOIL request, dated February 3, 2020, is attached hereto as **Exhibit 6**.

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8. A true and correct copy of the NYPD Records Access Appeals Officer's denial of Petitioner's FOIL appeal, dated February 4, 2020, is attached hereto as **Exhibit 7.**

Dated: New York, New York
October 5, 2020

DEBEVOISE & PLIMPTON LLP

/s/ Jeremy Feigelson
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