

5 April 2016

Requestor Travis Loller
The Associated Press
1207 18th Ave. South, Suite 261A
Nashville, TN 37212

Log Number 201600094

Please see the following response to a public records request sent to Steve Groom, General Counsel, CCA, via email on March 29, 2016.

1. **Any and all records reflecting which prisoners at the Trousdale Turner Correctional Facility have been held in segregated housing between Jan. 5 and March 29, including the dates they were held and the reasons they were held.**

CCA has identified six (6) pages of records that appear to be responsive to your request. Please send payment of \$1.39 (0.15 x 6 pages plus 0.49 postage) payable to CCA at the address below and include the Log Number in your correspondence to ensure proper handling. Be advised that some redactions will be applied based on safety and security concerns including, but not limited to those described in TCA 10-7-504(m) ("information directly related to the security of any government building") and TCA 10-7-504(a)(8) ("investigative records"). Upon receipt of payment, CCA will transmit the records to you with a detailed explanation of redactions applied.

Be further advised that, consistent with the exceptions identified above, some redactions will encompass de-identification of individuals whose safety may be jeopardized by the public release of their identities (for example, non-exhaustively: individuals in protective custody; individuals held pending investigation; and other individuals whose precise locations should not be known to the public or other inmates for the protection of those inmates, other inmates, staff, and members of the public).

Records Request
CCA Office of General Counsel
10 Burton Hills Blvd.
Nashville, TN 37215

2. **Any and all records that reflect the staffing levels at Trousdale Turner on a day-to-day basis from Jan. 5 to March 29. I am requesting records that reflect how many employees were actually present, their names, their positions, their shifts, and the hours they were physically present. I am not seeking personal information about the employees.**

CCA declines to provide the requested records to the extent that any responsive records actually exist. The request seeks records that predominantly comprise correctional facility security

staffing information for a government building. For this reason, the records sought are exempt from disclosure pursuant to TCA § 10-7-504(m) (1), which provides:

Information and records that are directly related to the security of any government building shall be maintained as confidential and shall not be open to public inspection. For purposes of this subsection (m), "government building" means any building that is owned, leased or controlled, in whole or in part, by the state of Tennessee or any county, municipality, city or other political subdivision of the state of Tennessee.

CCA operates correctional and detention facilities for federal, state, and local governments. This contracted for service, by its very nature, is security-centric. The vast majority of CCA employees at correction and detention facilities are charged with the performance of security duties, such as the protection of persons and property. Their work locations, hours of service, and individual job titles demonstrate the security posture of the affected institutions.

The Trousdale Turner Correctional Facility (TTCF) is operated pursuant to a contract with Trousdale County, Tennessee, a political subdivision of the state of Tennessee. The County, in turn, contracts with the Tennessee Department of Correction (TDOC), which places prisoners held pursuant to state authority at TTCF. TDOC, through its relationship with the County, exercises authority, control and oversight over the day to day operations of the affected facilities.

TTCF not only houses state prisoners, but is also used as an operational location for staff of TDOC. TDOC personnel have unfettered access to the facility, where they monitor compliance with state contracts and with applicable provisions of TDOC policy. TTCF provides equipment, office space, and meeting space used by government employees on a routine basis. Government employees are assigned to and stationed at the facilities.

The public revelation of records associated with the staffing of TTCF would compromise the security of the types of buildings envisioned by § 10-7-504 (m) (1). This is so because the information sought would allow members of the public to determine security related facility staffing by precise location and precise time. Public disclosure of this information would allow individuals and groups seeking to commit crimes or acts of terrorism affecting the facilities to assess periods and locations of supposed vulnerability, thereby enabling them to conduct activities threatening the security and good order of the facilities.

For just one example, the requestor's request would lead to public disclosure of the number of personnel patrolling the secure perimeters on each shift. This would facilitate escape plotting by non-incarcerated accomplices, seeking to determine the best times and days to attempt the facilitation of an escape.