

March 31, 2026

The Honorable Evan Shanley, Chair
House State Government and Elections Committee
State House, Smith Street
Providence, RI 02903

Re: H 7305

Dear Chairman Shanley:

I am writing to express concerns about one provision in H 7305, that would include the records of Brown campus police within the definitions of public records under the Access to Public Records Act. We appreciate your taking the time to consider our perspective.

We believe this provision is unwarranted due to the limited jurisdiction of Brown's police officers; the cooperative relationship we have with law enforcement agencies in furtherance of public safety; and the existing policies and practices that make information about criminal activities and incidents available to the community. Furthermore, this would represent an unprecedented intrusion into the private records of a private institution.

The jurisdiction of Brown's Department of Public Safety (DPS) is limited to university buildings and the streets adjacent thereto and the protection of university students, faculty, staff and property. DPS works closely with the Providence Police and other law enforcement agencies, and cooperates fully with requests from law enforcement, such as Providence Police and the Attorney General. DPS refers all cases for prosecution to the Providence Police Department and/or Rhode Island Attorney General and cooperates fully with requests from them for information. All cases prosecuted through the Providence Police Department and/or the Rhode Island Attorney General's office become available to the public through those entities at the time of charging.

In addition, under current law, DPS is required to provide any arrest reports to the department processing the arrest. As a result, the public has a means of accessing those arrest reports through public bodies such as the Providence Police Department or the State Police. *See* R.I. Gen. Laws § 12-2.1-5 ("The special police officers shall submit reports concerning an arrest to the department processing the arrest, whether the division of state police or the police in the city or town in which the educational institution is located.") DPS is not a public body and does not work on behalf of or in place of the Providence Police Department or the State Police. *See e.g.,* R.I. Gen. Laws § 12-2.1-5 ("Appointment of special police officers under this chapter shall in no way limit the powers, authority, and responsibility of state police and police of the various cities and towns to enforce state law and municipal ordinances on property owned by the educational institutions employing the special police officers.")

Brown's DPS shares information regularly and through a variety of means. DPS provides members of the Brown community with access to a daily crime log that includes time, date, location and type of incident (larceny, alcohol violation etc.) and disposition. DPS also issues a

weekly digest of campus crime on its website. Brown University is also required to report annual crime statistics on or before October 1, according to the federal Clery Act.

Given the limited jurisdiction of the Brown police, the cooperative relationship with law enforcement and current law and policies for sharing information, we believe current law and practice is sufficient to meet the goals of ensuring public safety. Making private institutional records available for public inspection would not further these interests.

Please also note that this issue is currently being litigated before the Rhode Island Superior Court in the matter *Bilow v. Brown University Department of Public Safety*, C.A. No. 2025-02879. It is not advisable for the General Assembly to act on this issue while it is pending in the courts.

Thank you for taking the time to consider this in your deliberations. If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Al Dahlberg". The signature is fluid and cursive, with a large initial "A" and a long, sweeping tail.

Al Dahlberg
Associate Vice President Government Relations
Brown University

cc: Members of the House State Government and Elections Committee