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- Status: Active or Inactive
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- Business Phone: Telephone number
- Business Email: Email address
- Address: Street address
- County: County name
- Type: Type of business or service
- Business Name: Name of the business or service
- Status: Status of the business or service, either Active or Inactive.
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2022-ICLI-00045-459
| Place                  | Code | Year | Month | Day | Sun  | Mon  | Tue  | Wed  | Thu  | Fri  | Sat  | Length | Type | Distance | Elevation | Result | Mexican Republic | Colombia | Venezuela | Ecuador | Peru | Argentina | Brazil | Japan | Russia | France | Italy | Spain | Germany | Austria | Switzerland | Other  | US     | UK     | Australia | Other  | Canada | Mexico | South Africa | Other  |
|-----------------------|------|------|-------|-----|------|------|------|------|------|------|------|--------|-------|-----------|-----------|--------|----------------|----------|-----------|---------|------|-----------|-------|-------|--------|--------|--------|--------|----------|--------|--------|--------|-----------|--------|---------|--------|-----------|--------|
| North Dakota          | NDK | 2022 | 1     | 1   | 0    | 0    | 0    | 0    | 0    | 0    | 0    | 0      | 0     | 0         | 0         | 0      | Release         | False    | True      | False   | False | False     | False | False | False   | False   | False   | False   | False    | False   | False   | False   | False    | False   | False   | False   | False    | False   |
| South Dakota          | SDK | 2022 | 1     | 2   | 0    | 0    | 0    | 0    | 0    | 0    | 0    | 0      | 0     | 0         | 0         | 0      | Release         | False    | True      | False   | False | False     | False | False | False   | False   | False   | False   | False    | False   | False   | False   | False    | False   | False   | False   | False    | False   |
| Minnesota             | MN   | 2022 | 1     | 3   | 0    | 0    | 0    | 0    | 0    | 0    | 0    | 0      | 0     | 0         | 0         | 0      | Release         | False    | True      | False   | False | False     | False | False | False   | False   | False   | False   | False    | False   | False   | False   | False    | False   | False   | False   | False    | False   |
| Oklahoma              | OK   | 2022 | 1     | 4   | 0    | 0    | 0    | 0    | 0    | 0    | 0    | 0      | 0     | 0         | 0         | 0      | Release         | False    | True      | False   | False | False     | False | False | False   | False   | False   | False   | False    | False   | False   | False   | False    | False   | False   | False   | False    | False   |
| Texas                 | TX   | 2022 | 1     | 5   | 0    | 0    | 0    | 0    | 0    | 0    | 0    | 0      | 0     | 0         | 0         | 0      | Release         | False    | True      | False   | False | False     | False | False | False   | False   | False   | False   | False    | False   | False   | False   | False    | False   | False   | False   | False    | False   |
| Colorado              | CO   | 2022 | 1     | 6   | 0    | 0    | 0    | 0    | 0    | 0    | 0    | 0      | 0     | 0         | 0         | 0      | Release         | False    | True      | False   | False | False     | False | False | False   | False   | False   | False   | False    | False   | False   | False   | False    | False   | False   | False   | False    | False   |
| New Mexico            | NM   | 2022 | 1     | 7   | 0    | 0    | 0    | 0    | 0    | 0    | 0    | 0      | 0     | 0         | 0         | 0      | Release         | False    | True      | False   | False | False     | False | False | False   | False   | False   | False   | False    | False   | False   | False   | False    | False   | False   | False   | False    | False   |
| Nevada                | NV   | 2022 | 1     | 8   | 0    | 0    | 0    | 0    | 0    | 0    | 0    | 0      | 0     | 0         | 0         | 0      | Release         | False    | True      | False   | False | False     | False | False | False   | False   | False   | False   | False    | False   | False   | False   | False    | False   | False   | False   | False    | False   |
| Arizona               | AZ   | 2022 | 1     | 9   | 0    | 0    | 0    | 0    | 0    | 0    | 0    | 0      | 0     | 0         | 0         | 0      | Release         | False    | True      | False   | False | False     | False | False | False   | False   | False   | False   | False    | False   | False   | False   | False    | False   | False   | False   | False    | False   |
| Utah                  | UT   | 2022 | 1     | 10  | 0    | 0    | 0    | 0    | 0    | 0    | 0    | 0      | 0     | 0         | 0         | 0      | Release         | False    | True      | False   | False | False     | False | False | False   | False   | False   | False   | False    | False   | False   | False   | False    | False   | False   | False   | False    | False   |
| Idaho                 | ID   | 2022 | 1     | 11  | 0    | 0    | 0    | 0    | 0    | 0    | 0    | 0      | 0     | 0         | 0         | 0      | Release         | False    | True      | False   | False | False     | False | False | False   | False   | False   | False   | False    | False   | False   | False   | False    | False   | False   | False   | False    | False   |
| Wyoming               | WY   | 2022 | 1     | 12  | 0    | 0    | 0    | 0    | 0    | 0    | 0    | 0      | 0     | 0         | 0         | 0      | Release         | False    | True      | False   | False | False     | False | False | False   | False   | False   | False   | False    | False   | False   | False   | False    | False   | False   | False   | False    | False   |
| Montana               | MT   | 2022 | 1     | 13  | 0    | 0    | 0    | 0    | 0    | 0    | 0    | 0      | 0     | 0         | 0         | 0      | Release         | False    | True      | False   | False | False     | False | False | False   | False   | False   | False   | False    | False   | False   | False   | False    | False   | False   | False   | False    | False   |
| Idaho                 | ID   | 2022 | 1     | 14  | 0    | 0    | 0    | 0    | 0    | 0    | 0    | 0      | 0     | 0         | 0         | 0      | Release         | False    | True      | False   | False | False     | False | False | False   | False   | False   | False   | False    | False   | False   | False   | False    | False   | False   | False   | False    | False   |
| Oregon                | OR   | 2022 | 1     | 15  | 0    | 0    | 0    | 0    | 0    | 0    | 0    | 0      | 0     | 0         | 0         | 0      | Release         | False    | True      | False   | False | False     | False | False | False   | False   | False   | False   | False    | False   | False   | False   | False    | False   | False   | False   | False    | False   |
| Nevada                | NV   | 2022 | 1     | 16  | 0    | 0    | 0    | 0    | 0    | 0    | 0    | 0      | 0     | 0         | 0         | 0      | Release         | False    | True      | False   | False | False     | False | False | False   | False   | False   | False   | False    | False   | False   | False   | False    | False   | False   | False   | False    | False   |
| Utah                  | UT   | 2022 | 1     | 17  | 0    | 0    | 0    | 0    | 0    | 0    | 0    | 0      | 0     | 0         | 0         | 0      | Release         | False    | True      | False   | False | False     | False | False | False   | False   | False   | False   | False    | False   | False   | False   | False    | False   | False   | False   | False    | False   |
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2022-ICLI-00045-465
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**Summary:** The table above lists the number of individuals of each gender and their corresponding access to Adult ID Pass at various housing complexes and additional facilities located in North Carolina. The data spans from 1/19/22 to 1/19/22 with the same entries repeated multiple times, indicating potential data entry errors or inconsistencies. The gender distribution is consistent, with each gender present in equal numbers across all entries. The access to Adult ID Pass is also consistent, with all entries indicating access to Adult ID Pass.
2022-ICLI-00045-467


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2022-ICLI-00045-472
2022-ICLI-00045-473


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2. CAA is the Conference Association of Agriculture.
3. NA denotes not applicable.
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*Note: The table includes various items with different codes and dates, but the context and specific details are not clear from the image.*
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### Notes
- Fax and Tele numbers are provided for contact purposes.
- Email addresses are for official communication.
- Website links are provided for access to more information.
- Notes indicate whether the contact is public or restricted.

### Additional Information
- Additional columns such as Fax, Tele, and Email are provided for contact details.
- Agency names and contact information are listed for easy reference.

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**Note:** The above list is illustrative and not exhaustive. Each facility may have specific conditions and challenges that require targeted interventions.
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**Notes:**
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- Notes: Any additional notes or comments related to the reporting type.
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- **No:** No infection reported.
- **Yes:** Infection reported.

**Notes:**
- **Occupied:** Room is occupied.
- **Vacant:** Room is vacant.
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2022-ICLI-00045-501
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|-------|--------|----------|------|---------|------|--------|-------|----------|-----------|-----|---------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
|      |        |          | 101C |         |      |        |       |          |            |    |         |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
|      |        |          | 102C |         |      |        |       |          |            |    |         |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
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|      |        |          | 109C |         |      |        |       |          |            |    |         |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |
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2022-ICLI-00045-510
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<td>Dallas, TX 75204</td>
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<td>CoreNet, Inc.</td>
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*Note: Relationship and Address Verification Status columns are marked with placeholders.*

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Note: The table provides a summary of cases, including demographic and clinical information, across different regions and countries. The data includes details on the occurrence of pneumonia, sepsis, and end-stage renal disease, along with mortality rates.
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**Event Details**

- Event 1: A community service event focused on education.
- Event 2: A health fair with free medical consultations.
- Event 3: A charity run to raise funds for local education projects.

**Location Details**

- Location 1: Community Center, 123 Main St, New City.
- Location 2: Local Park, 456 Park Ave, New City.
- Location 3: Library, 789 Book St, New City.
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**Note:**
- AAA Inc is located in Woodland, CA.
- BBB Corp is located in Redwood, CA.
- CCC LLC is located in San Jose, CA.
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<td>18</td>
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<td>Late</td>
<td>Return</td>
<td>120</td>
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<td>18</td>
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<td>12:00</td>
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<td>Return</td>
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</table>

**Notes:**
- Late: indicating the vehicle is running late.
- Return: indicating the vehicle is returning.
- Action: indicating the specific action the vehicle is performing.
- ID: indicating the unique identifier for the vehicle.

*All times are in 24-hour format.*
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<tr>
<th>Facility</th>
<th>Location</th>
<th>Number of Adults</th>
<th>Number of Seniors</th>
<th>Number of Youth</th>
<th>Number of Children</th>
<th>Number of Beds</th>
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| IMA SDC | New York | 1/18/2022 | 2 | 0 | 0 | 0 | Inside | Available (10)
| IMA SDC | New York | 1/18/2022 | 2 | 0 | 0 | 0 | Inside | Available (10)
| IMA SDC | New York | 1/18/2022 | 2 | 0 | 0 | 0 | Inside | Available (10)
| IMA SDC | New York | 1/18/2022 | 2 | 0 | 0 | 0 | Inside | Available (10)
| IMA SDC | New York | 1/18/2022 | 2 | 0 | 0 | 0 | Inside | Available (10)
| IMA SDC | New York | 1/18/2022 | 2 | 0 | 0 | 0 | Inside | Available (10)
| IMA SDC | New York | 1/18/2022 | 2 | 0 | 0 | 0 | Inside | Available (10)
| KAMC Family Daycare Center | New York | 1/23/2022 | 2 | 0 | 0 | 0 | Inside | Available (10)
| KAMC Family Daycare Center | New York | 1/23/2022 | 2 | 0 | 0 | 0 | Inside | Available (10)
| KAMC Family Daycare Center | New York | 1/23/2022 | 2 | 0 | 0 | 0 | Inside | Available (10)
| KAMC Family Daycare Center | New York | 1/23/2022 | 2 | 0 | 0 | 0 | Inside | Available (10)

*Note: The above table represents a sample of facilities and their availability status as of 2022-ICLI-00045-554.*
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<th>Account Number</th>
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<th>Account Name</th>
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<th>City</th>
<th>Address</th>
<th>Phone</th>
<th>Email</th>
<th>Notes</th>
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</thead>
<tbody>
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<td>1234567890</td>
<td>Savings Account</td>
<td>First National Bank</td>
<td>123 Main St</td>
<td>City, State</td>
<td>123-456-7890</td>
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<td>None</td>
<td></td>
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<td>9876543210</td>
<td>Checking Account</td>
<td>Second National Bank</td>
<td>456 Oak Ave</td>
<td>City, State</td>
<td>098-765-4321</td>
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2022-ICLI-00045-559
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<th>ZIP Code</th>
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<th>Service Area 3</th>
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2022-ICLI-00045-564
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<th>Change</th>
<th>Name</th>
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<td>Active</td>
<td>1</td>
<td>Smith</td>
<td>123 Main St.</td>
<td>5000.00</td>
</tr>
<tr>
<td>Jane Smith</td>
<td>1/2/2022</td>
<td>Active</td>
<td>2</td>
<td>Johnson</td>
<td>456 Oak Ave.</td>
<td>7500.00</td>
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<tr>
<td>Mary White</td>
<td>1/3/2022</td>
<td>Active</td>
<td>3</td>
<td>Brown</td>
<td>789 Pine Dr.</td>
<td>2500.00</td>
</tr>
<tr>
<td>Peter Green</td>
<td>1/4/2022</td>
<td>Active</td>
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<td>Miller</td>
<td>012 Elm Sq.</td>
<td>1500.00</td>
</tr>
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<td>Susan Brown</td>
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<td>Active</td>
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<td>321 Pearl Rd.</td>
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- **Change** column indicates the change in the institution's status.
- **Name** column lists the names of the institutions.
- **Address** column provides the addresses of the institutions.
- **Balance** column shows the current balance of the institutions.
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**Notes:**
- *Status*: Yes indicates availability, No indicates unavailability.
- *Type*: Adult indicates availability for adults, Minor indicates availability for minors.
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2022-ICLI-00045-625


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**Nota:**
- Monto: Monto en USD.
- Moneda: Moneda en USD.
- Tipo: Tipo de transacción (Nota, Débito, Transferencia).
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- **Type of Test**: N/A
- **Failure Location**: N/A

**Virology**

- **Date of Test**: 01/31/2021
- **Type of Test**: N/A
- **Failure Location**: N/A

**Testing Location**

- **Date of Test**: 01/31/2021
- **Type of Test**: N/A
- **Failure Location**: N/A

**Artificial Intelligence**

- **Date of Test**: 01/31/2021
- **Type of Test**: N/A
- **Failure Location**: N/A

**Laboratory**

- **Date of Test**: 01/31/2021
- **Type of Test**: N/A
- **Failure Location**: N/A

**Data Source**

- **Date of Test**: 01/31/2021
- **Type of Test**: N/A
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**Laboratory**

- **Date of Test**: 01/31/2021
- **Type of Test**: N/A
- **Failure Location**: N/A

**Testing Location**

- **Date of Test**: 01/31/2021
- **Type of Test**: N/A
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**ALL DATA PRIOR TO MAY 1, 2021 HAS BEEN ARCHIVED**
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<td># Positives</td>
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• La Quinta-Wyndham (Casa do Sonho) Cotulla, TX: **No testing reported.**
• Hotel Ava (Casa do Tranquilidade) Laredo, TX: **No testing reported.**

**Family Testing Missions:**
• **Donna, TX Testing Mission:** PHS Officers (CAPT (b)(6), (b)(7)(C)) ITOS; CDR (b)(6), (b)(7)(C) ITOS; CDR (b)(6), (b)(7)(C) ITOS; LCDR (b)(6), (b)(7)(C) ITOS; LCDR (b)(6), (b)(7)(C) ITOS) arrived at Donna, TX at 0745 hours ready to test families. On 1/31/2022, the testing began at 0930 Central Time and concluded at 1445. There were 79 children and 77 adults tested with 30 being positive (~19%). The Abbott ID Now test kits were present upon arrival. There were no refusals.

• **Yuma, AZ Testing Mission:** On 1/31/2022, no testing was done and no PHS Officers reported to the site.

(b)(6); (b)(7)(C)

Captain, United States Public Health Service
Program Manager, Health Operations Plans and Programs (HOPPs)
ICE Health Service Corps (IHSC)
**Enforcement and Removal Operations (ERO)**
**U.S. Immigration and Customs Enforcement (ICE)**
Direct: (202) 321

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FYSA

See attached. 15 facilities conducted testing.

**COVID Vaccine Administration reported on 1/31/2022:**

- Eloy Detention Center administered **26 Janssen** vaccines and had 23 refusals (~47%).
- Orange County Correctional administered **22 Moderna** vaccines and had **0 refusals** (0%).
- Orange County Correctional administered **10 Pfizer** vaccines and had **0 refusals** (0%).
- Orange County Correctional administered **2 Janssen** vaccines and had **0 refusals** (0%).
- IAH Polk administered **5 Janssen** vaccines and had **0 refusals** (0%).
- El Paso Service Processing Center administered **0 Janssen** vaccines and had 13 refusals (100%).
- Florence Service Processing Center administered **2 Janssen** vaccines and had **0 refusals** (0%).
- La Palma Correctional Facility administered **10 Janssen** vaccines and had 272 refusals (~96%).
- Alexandria Staging Facility administered **5 Janssen** vaccines and had 1 refusals (~16%).
- Alexandria Staging Facility administered **1 Pfizer** vaccines and had **0 refusals** (0%).
- LaSalle ICE Processing Center administered **5 Janssen** vaccines and had 3 refusals (~38%).
- South Texas Family Staging Center administered **0 Janssen** vaccines and had 35 refusals (100%).
- Bluebonnet Detention Center administered **5 Pfizer** vaccines and had **0 refusals** (0%).
- Northwest ICE Processing Center administered **2 Janssen** vaccines and had 2 refusals (50%).
- Houston Contract Detention Facility administered **21 Janssen** vaccines and had 7 refusals (25%).
- LaSalle ICE Processing Center administered **5 Janssen** vaccines and had 2 refusals (~29%).
- South Texas ICE Processing Center administered **23 Janssen** vaccines and had 11 refusals (~32%).

**Endeavor Mission:**
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2022-ICLI-00045-653


From: (b)(6) [redacted]@usdoj.gov
Sent: Monday, March 14, 2022 9:19 AM
To: (b)(6) [redacted]@ice.dhs.gov; (b)(6) [redacted]@hq.dhs.gov; (b)(6) [redacted]@ice.dhs.gov; (b)(6) [redacted]@hq.dhs.gov

Subject: RE: [EXTERNAL] Fraihat

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Good morning.

In addition to opposing counsel’s settlement related questions for tomorrow, they have also sent along a series of questions/concerns regarding PI compliance that I have attached here. Please let us know if there is anything in here that ICE would like to discuss initially, but we would otherwise request consolidated responses by COB Friday, or a heads up by COB Thursday if responses are taking longer to assemble and draft.

Thank you,

(b)(6) [redacted]@ice.dhs.gov
Deputy Director  
Office of Immigration Litigation  
District Court Section  
(202) 616-
Good morning, ICE –

Thank you for the support preparing for and during Monday’s mediation session. As expected due to the timing, there was not a lot of substantive progress made in this session. We noted [b][5]

We scheduled the next mediation session for April 12, 2022, 11am ET, but Judge Wilner was clear that he did not want to gather everyone again if the parties were not ready to make substantive progress by that date.

Lastly, a reminder that we need DHS and ICE positions on Plaintiffs’ extension request on the en banc rehearing deadline.

Thank you
[b][5]

Senior Litigation Counsel
U.S. Department of Justice, Civil Division
Office of Immigration Litigation – District Court Section
P.O. Box 868 | Ben Franklin Station | Washington, DC 20044
Direct: (202) 532- [b][5] Fax: (202) 305-7000 | Email: [b][5] @usdoj.gov
Subject: RE: [EXTERNAL] Fraihat

Yes, 60 days.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-9899
Thank you, I think that would be helpful.

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I can ask, but I’d imagine another 60 days.

Deputy Director  
Office of Immigration Litigation  
District Court Section  
(202) 616-8777.

From: [b](b)[6],[b](b)[7][C] ice.dhs.gov

Sent: Wednesday, March 02, 2022 4:52 PM

To: [b](b)[6],[b](b)[7][C] hq.dhs.gov; [b](b)[6],[b](b)[7][C] usdoj.gov

Cc: [b](b)[6],[b](b)[7][C] ice.dhs.gov; [b](b)[6],[b](b)[7][C] usdoj.gov

Subject: RE: [EXTERNAL] Fraihat

What is the timeframe Plaintiffs are requesting for another extension? I do not see the draft motion attached.

Kind regards,

[b](b)[6],[b](b)[7][C]

Associate Legal Advisor  
U.S. Immigration and Customs Enforcement  
Office of the Principal Legal Advisor  
District Court Litigation Division  
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-...
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From: usdoj.gov>
Sent: Wednesday, March 2, 2022 3:34 PM
To: hq.dhs.gov>
Cc: ice.dhs.gov>
@ice.dhs.gov>
@hq.dhs.gov>
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(b)\(6\), (b)\(7\)
Padilla, Kenneth
Davis, Mike P
@ice.dhs.gov>

Subject: RE: [EXTERNAL] Fraihat

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Please also see below, opposing counsel’s request for a further continuance of their deadline to seek en banc consideration of the Ninth Circuit’s decision. I’d like to be able to get back to them before the end of the week.

If there is concern about the pace of mediation, I would propose that we could agree to one more extension, but that we would need to see progress in mediation before agreeing to any further extensions?

Thanks,
I hope you are doing well. The current deadline for filing a petition for rehearing en banc is April 5, so we would like to get another consent motion for an extension on file next week to allow the mediation efforts to keep proceeding. It seems like Judge Wilner has been helpful and both sides feel that mediation has been productive so far. Please let us know if the attached motion is acceptable to ICE.

Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-9000

From:
Sent: Wednesday, March 02, 2022 12:59 PM
To:
Cc:
Subject: RE: [EXTERNAL] Fraihat

Please find below Plaintiffs’ response. Please confer and let me know what ICE/DHS prefer. If past practice is any guide, I would recommend a response along these lines:

- 

2022-ICLI-00045 5014
Thank you for the below information. We will not have time to prepare written responses ahead of our March 7 meeting with your team and Judge Wilner, but we do think a meeting is still worthwhile and will be prepared to discuss the information you’ve shared at that meeting, with a particular focus on: the redetention proposal, the potential revised guidance regarding notice to class members, and consideration of subclass members held under 236c. We will likely primarily seek clarification and more information so that we can fully consider proposals or counter.

I will also under separate cover send you a proposal for moving forward with segregation and disability discussions after we wrap up with the PI, which will hopefully assuage your and your clients’ concern about addressing the whole case. These are the next two topics on our list of topics to cover and we think they can be handled in a similar format, which we will propose. I will get that to you shortly.

Many thanks

From: [Redacted]
To: [Redacted]
Cc: [Redacted]
Sent: Friday, February 25, 2022 12:35 PM

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-[Redacted]

[Redacted]
Thanks everyone.

---

Subject: RE: [EXTERNAL] Faihat

please see a few edits in the attached.

---

Assistant General Counsel for Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(202) 744-3541
misdirected and immediately destroy all originals and copies. Furthermore, do not print, copy, re-transmit, disseminate, or otherwise use this information. Any disclosure of this communication or its attachments must be approved by the Office of the General Counsel, U.S. Department of Homeland Security. This document is for INTERNAL GOVERNMENT USE ONLY and may be exempt from disclosure under the Freedom of Information Act, 5 U.S.C. §§ 552(b)(5), (b)(7).
From: [Redacted]@usdoj.gov
Sent: Thursday, February 24, 2022 9:10 PM
To: [Redacted]@hq.dhs.gov
Cc: [Redacted]@ice.dhs.gov

Subject: Re: [EXTERNAL] Fraihat

Anything on this folks? Opposing counsel is checking in on our status so they can move forward with their revised proposal.

Sent from my iPad

On Feb 24, 2022, at 11:18 AM, [Redacted]@usdoj.gov wrote:

Thanks for the call this morning. Please find attached a draft email for opposing counsel that attempts to distill our current positions. I appreciate any comments/edits that can be provided by COB, or let me know if you’ll need longer.
Subject: RE: [EXTERNAL] Fraihat

Thanks. I will coordinate with [b](6); (b)(7)(C) schedule and link up with ICE to determine a time.

Kind regards,

[b](6); (b)(7)(C)

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(o) (202) 282 (b)(6); (m) (202) 855 (b)(6); (b)(7)(C)

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From [b](6); (b)(7)(C) @usdoj.gov
Sent: Wednesday, February 23, 2022 2:50 PM
To [b](6); (b)(7)(C) @usdoj.gov
Cc [b](6); (b)(7)(C) @usdoj.gov
Subject: Re: [EXTERNAL] Fraihat

Thank you. I think a call is still warranted to clear a few of our specific asks up. Can you please propose a time that works tomorrow?

Sent from my iPhone

On Feb 23, 2022, at 11:32 AM, @hq.dhs.gov wrote:

Hi,

Attached please find consolidated/updated input from DHS + ICE and let us know if there's any more follow up needed before responding. Thanks for your patience.

Kind regards,

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(o) (202) 282-8737
(h) (202) 853-2741

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From: @usdoj.gov
Sent: Tuesday, February 22, 2022 5:01 PM
Thanks, and I see that the call was just cancelled. Should we still expect updates today, which we will then need to digest and get back to opposing counsel.

Sent from my iPhone

On Feb 22, 2022, at 9:52 AM @hq.dhs.gov wrote:

Friends—

Flagging that DHS and ICE are working on revised responses for DOJ’s review and anticipate canceling this call. We will follow up shortly.

Kind regards,

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security

---

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<Fraihat Draft Responses to OIl re Plaintiffs Mediation Follow Ups 2.22.22 (002) (2 23 22 Updated ICE DHS Input).docx>
<Fraihat 2.24 Draft Email to Counsel.docx>
From: [Redacted]
Sent: Fri, 13 May 2022 21:31:24 +0000
To: [Redacted]
Cc: [Redacted]
Subject: Re: [EXTERNAL] Fraihat

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click here and follow instructions.

Please see below opposing counsel’s ask for our position on a further en banc extension by COB Monday. I’ve already responded to indicate that we may not be able to get back to them by then.

Please let me know what ICE and DHS think so I can send some response by Monday.

- If we are going to file another consent extension, we really need to do so ASAP. [Redacted] tells me that you are still waiting for you’re the agency’s final views. We very much appreciate your efforts in getting an answer. Given the last 9th Circuit order, we will need to be able to tell the Court we are making substantial progress in the negotiations. I would be helpful for you to provide us language you would be comfortable with. And let us know whether you will agree to seeking another 60, or would only agree to 45 or 30.

Could you please get back to us by Monday COB? I feel like we are already late in filing this and want to get it done, if we can.

Thanks,

Sent from my iPhone

On May 13, 2022, at 12:22 PM, [Redacted]@usdoj.gov> wrote:
Apologies again for the delay. We will get this to you this afternoon.

Sent from my iPhone

On May 10, 2022, at 2:12 PM [b](b)(7)(C) wrote:

Good afternoon,

Following up on my previous request, do you have an estimate on when we can expect Oll’s thoughts on agreeing, or not agreeing, to another extension to file the en banc review?

Thanks in advance,

[b](b)(6)

Acting Deputy Chief, on detail
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Thanks.

I’ll pass that along and we’ll get you something today.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From: b6(b); b7(c)
Sent: Friday, May 06, 2022 12:52 PM
To: b6(b); b7(c)

Subject: RE: [EXTERNAL] Fraihat

ICE could be available for the next mediation session on May 23 from 3-5pm ET. Additionally, we are working to have our responses to Plaintiffs’ proposal to OIL by May 10.

Lastly to follow up, is OIL able to provide any pros and cons on possibly agreeing to another extension to file the en ban petition?

Thank you!

2022-ICLI-00045  5027
Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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From: [b](6), [b](7)
Sent: Tuesday, May 3, 2022 10:28 AM
To: [b](6), [b](7)
Cc: [b](6), [b](7)

Subject: RE: [EXTERNAL] Fraihat

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We’ll get you pros and cons re a further extension today.
Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From: Ice.dhs.gov>
Sent: Monday, May 02, 2022 9:08 AM
To: Usdoi.gov>
Cc: Usdoi.gov; Hq.dhs.gov>
Subject: RE: [EXTERNAL] Fraihat
Thank you, we are trying to see which of those slots may work.

In the meantime, can OIL provide insights on the pros and cons for agreeing to another extension for plaintiffs to file a petition en banc for ICE to consider as we elevate?

Kind regards,

[Redacted]

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-8657

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I'm looping in [b] who may be plugging into this case after today and until a new immigration deputy comes onboard.

Deputy General Counsel
U.S. Department of Homeland Security

(202) 88 (ph)

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Fr

Sent: Thursday, April 28, 2022 3:49 PM

Subject: RE: [EXTERNAL] Fraihat

So that attempt at scheduling didn’t work. Here’s Plaintiffs’ response.

Any chance we can work with their hours on 5/17, and if not, what works for ICE the following week?

We can meet between 10:30 and 2:00 Pacific on 5/17. I also should clarify that, based on our previous meetings, we’re working under the assumption that this would be a two-hour session.
In the event the 5/17 times won't work, our availability the week of May 23 is as follows (all times Pacific):

May 23: any time in the afternoon
May 24: 1:00p – 3:00p
May 25: 9:00a – noon
May 26: 11:30a – 2:00p
May 27: 10:30a – 4:00p

From: [Your Email] @ice.dhs.gov
Sent: Tuesday, April 26, 2022 9:47 AM
To: [Recipient's Email] @ice.dhs.gov
Cc: [Other Recipients'] Email @ice.dhs.gov

Subject: RE: [EXTERNAL] Faihat

Hi [Recipient's Name]

Yes, we will work to have the proposal to OIL by 5/11 and we will work on a position on another potential extension of the deadline for Plaintiffs’ to file a petition en banc.

Regarding the next mediations session, ICE’s availability is below.

- Monday (May 16)
- Tuesday between 10 and 2 (May 17)
Friday from 9 to 3 (May 20)

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253

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From: @usdoj.gov
Sent: Friday, April 22, 2022 12:03 PM
To: @ice.dhs.gov>
Cc: @hq.dhs.gov>; b>(6), (b)7(C)@ice.dhs.gov>
Subject: Re: [EXTERNAL] Fraihat
Thank you.

Will ICE prepared to have your thoughts to us by the 11th?

And can ICE and DHS get together on views on a further extension of the en banc deadline, which is coming up again in June (so we’re likely going to be asked for our position before we sit down with the mediator again).

Sent from my iPad

On Apr 22, 2022, at 11:21 AM <ice.dhs.gov> wrote:

Hi [redacted]

ICE request that the mediation session be the third week of May (week of May 16), given the amount of review the proposal would need and in order to have the most productive mediation session. We are gathering availability so we can propose the dates.

Kind regards,

[redacted]

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253

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From: <usdoj.gov>
Sent: Friday, April 22, 2022 11:00 AM
Subject: RE: [EXTERNAL] Fraihat

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ICE, does this proposed timeline work for you? I’d like to confirm with opposing counsel and the Magistrate Judge, thanks.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From:  
Sent: Tuesday, April 19, 2022 12:27 PM
As a suggestion, if we were to propose a day to meet with Plaintiffs the week of May 9, we could build in a few more days for ICE to develop a response – say by May 3, which we could review/discuss and send over to Plaintiffs by May 6.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-9784

From: [ICE] [Redacted]
Sent: Tuesday, April 19, 2022 12:23 PM
To: [ICE] [Redacted]
Cc: [ICE] [Redacted]

Subject: RE: [EXTERNAL] Fraihat

Okay, thank you. ICE is considering if the timeline is feasible and will follow up.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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From: [REDACTED]@usdoj.gov
Sent: Tuesday, April 19, 2022 11:55 AM
To: [REDACTED]@usdoj.gov; [REDACTED]@usdoj.gov; [REDACTED]@usdoj.gov
Cc: [REDACTED]@usdoj.gov; [REDACTED]@usdoj.gov; [REDACTED]@usdoj.gov

Subject: RE: [EXTERNAL] Fraihat

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Under Plaintiffs’ proposed timeline, we would need ICE’s responses sent to OIL by the 29th to give us a few days to review and clarify with ICE, to then transmit to opposing counsel sometime during the following week of May 2, in time for a mediation session that week. It’s an ambitious timeline to say the least.

Best,

From: [REDACTED]@ice.dhs.gov
Sent: April 19, 2022 11:48 AM
To: @usdoj.gov; @hq.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; Padilla, Kenneth @ice.dhs.gov; @HQ.DHS.GOV; @ice.dhs.gov; Loiacono, Adam V @ice.dhs.gov; Davis, Mike P @ice.dhs.gov
Cc: @hq.dhs.gov; @ice.dhs.gov; @usdoj.gov; @hq.dhs.gov; @usdoj.gov; @usdoj.gov; @usdoj.gov
Subject: RE: [EXTERNAL] Fraihat

Thank you for sending. Would the goal be to have ICE’s responses sent to OIL by April 29 or to Plaintiffs by April 29, so to OIL a few days before then?

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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From: busdoj.gov>
Sent: Tuesday, April 19, 2022 11:20 AM
To: ice.dhs.gov>
Cc: hq.dhs.gov>

Subject: RE: [EXTERNAL] Fraihat

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click here and follow instructions.

Good morning At long last, attached is Plaintiffs’ COVID-related settlement proposal and a note that they are awaiting two items from us, see below. Also attached is a Word version of their proposal to make internal comments easier. We are just beginning to review here as well.

They propose a mediation to discuss these proposals the first week of May, which would require a response from ICE no later than April 29, 10 days from now, to allow time to discuss and refine ICE’s responses internally before conveying to counsel in time for a mediation the week after. If that is not sufficient time, please propose an alternative window that we can respond with as soon as you can.

Plaintiffs note that they are waiting on:
1. The template proposed cover letter to accompany I-831s; and
2. The statistician’s analysis of whether ICE can create reports for subclass members that include entire detention histories.

Thank you,

From: ice.dhs.gov>
Sent: April 15, 2022 5:43 PM
To: ice.dhs.gov>
Cc: busdoj.gov>

2022-ICLI-00045 5039
From: [b](6); [b](7)(C)
Sent: Tuesday, April 5, 2022 6:38 PM
To: [b](6); [b](7)(C)
Cc: [b](6); [b](7)(C)
Subject: RE: [EXTERNAL] Fraihat

Hi [b](6)

Regarding this individual, based on the information we have so far, it appears that ICE did receive Fraihat release requests, as alleged by plaintiffs. We have requested additional information from ERO. As soon as we receive it, we will pass that along.

Thank you very much.

Sincerely,

[b](6); [b](7)(C)

Associate Legal Advisor
Department of Homeland Security
Immigration and Customs Enforcement
Office of the Principal Legal Advisor—District Court Litigation Division
500 12th Street SW Mailstop 5900
Washington, D.C. 20536
Mobile Phone: (202) 606-

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or its attachments must be approved by the OPLA, U.S. ICE. This document is for INTERNAL GOVERNMENT USE ONLY and may be exempt from disclosure under the Freedom of Information Act, 5 USC §§ 552(b) (5), (b)(7).

From: (b)(8), (b)(7)(C) @usdoj.gov
Sent: Thursday, March 31, 2022 6:51 PM
To: (b)(6), (b)(7)(C) @ice.dhs.gov

Subject: Re: [EXTERNAL] Faihat

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Thanks. Any details about what happened here?

Sent from my iPhone

On Mar 31, 2022, at 5:25 PM (b)(6), (b)(7)(C) @ice.dhs.gov wrote:

Hi OIL,

Per ERO, this individual is being released from ICE custody today. Attached is the I-831.

Thank you.

(b)(6), (b)(7)(C)

Associate Legal Advisor
Department of Homeland Security
Immigration and Customs Enforcement
Office of the Principal Legal Advisor—District Court Litigation Division
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Please find attached one additional allegation of Fraihat noncompliance, for which Plaintiffs request a response by March 31. The detainee reference in this email is listed at Row 33900 of the latest bi-weekly production, and reflects a custody determination having occurred in August 2021.

In reviewing the situation and responding, can ICE be sure to address ICE’s compliance with the following provisions of the PI enforcement order? I think it is fair to say that Plaintiffs are reading procedures into the Court’s orders regarding custody redeterminations that are not part of those orders – but any factual response will be helpful to address their concerns before this goes to the Special Master.
Please let know if there are any questions or clarification needed before sending a response over for OIL’s review.

Please get us a response by noon on Thursday, or a heads up when you expect to send it.

Thank you,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From: Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

Sent: Friday, March 25, 2022 9:48 PM

To: @ice.dhs.gov; @hq.dhs.gov; @hq.dhs.gov; @usdoj.gov;
Cc: @ice.dhs.gov; @usdoj.gov; @ice.dhs.gov; @ice.dhs.gov;

Subject: RE: [EXTERNAL] Fraihat

Thank you. I’ve incorporated as best I can and send the attached final correspondence to opposing counsel.

Deputy Director
Office of Immigration Litigation
From: @ice.dhs.gov>
Sent: Friday, March 25, 2022 7:46 PM
To: @usdoj.gov; @usdoj.gov; @ice.dhs.gov; @hq.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @hq.dhs.gov; Loiacono, Adam V @ice.dhs.gov; Davis, Mike P @ice.dhs.gov
Cc: @ice.dhs.gov; Padilla, Kenneth @ice.dhs.gov
Subject: RE: [EXTERNAL] Fraihat

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Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253- (b)(6) 253-

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From: [b](6); [b](7)
Sent: Friday, March 25, 2022 4:56 PM
To: [b](6); [b](7)
Cc: [b](6); [b](7)

Subject: RE: [EXTERNAL] Fraihat

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Following up on this please.

(b)(6)
Deputy Director
Office of Immigration Litigation
From: [b(6); b(7)(C)]

Sent: Thursday, March 24, 2022 2:28 PM

To: [b(6); b(7)(C)]

Cc: [b(6); b(7)(C)]

Subject: RE: [EXTERNAL] Frihat

Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-__

---

[b(6); b(7)(C); b(6)]

---

[b(6); b(7)(C)]]
Subject: RE: [EXTERNAL] Fraihat
Kind regards,

[Redacted]

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-
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From: @usdoj.gov
Sent: Thursday, March 24, 2022 10:52 AM
To: @ice.dhs.gov; @hq.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov
Cc: Padilla, Kenneth @ice.dhs.gov; Padilla, Kenneth @ice.dhs.gov; Padilla, Kenneth @ice.dhs.gov; Padilla, Kenneth @ice.dhs.gov; Padilla, Kenneth @ice.dhs.gov; Padilla, Kenneth @ice.dhs.gov; Padilla, Kenneth @ice.dhs.gov; Padilla, Kenneth @ice.dhs.gov; Padilla, Kenneth @ice.dhs.gov; Padilla, Kenneth @ice.dhs.gov; Padilla, Kenneth @ice.dhs.gov; Padilla, Kenneth @ice.dhs.gov; Padilla, Kenneth @ice.dhs.gov
Subject: RE: [EXTERNAL] Fraihat

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Thanks,

[Redacted]

[Redacted]
Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From: @ice.dhs.gov
Sent: Thursday, March 24, 2022 10:30 AM
To: @ice.dhs.gov; usdoj.gov; hq.dhs.gov;
Cc: @ice.dhs.gov; usdoj.gov; hq.dhs.gov;

Subject: RE: [EXTERNAL] Fraihat

ICE accepts the suggested edits in blue from OIL. In addition, please see ICE’s responses to OIL’s questions in green below.

Kind regards,
Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-
OIL’s proposed additions are below in below, and question are in blue and highlighted. Nothing too major here – we’d like to turn this back to Plaintiffs by tomorrow. Please let us know if that will be possible.

Hi

Please see below for ICE’s responses in red. Please note that two requests below need additional time for ICE to finalize a response.
(b)(6), (b)(7)(C), (b)(5)
Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-
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From: usdoj.gov>
Sent: Monday, March 14, 2022 9:19 AM
To: @usdoj.gov>; (b)(6); (b)(7)(C)
Cc: (b)(6); (b)(7)(C)

Subject: RE: [EXTERNAL] Fraihat

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Good morning.

In addition to opposing counsel’s settlement related questions for tomorrow, they have also sent along a series of questions/concerns regarding PI compliance that I have attached here. Please let us know if there is anything in here that ICE would like to discuss initially, but we would otherwise request consolidated responses by COB Friday, or a heads up by COB Thursday if responses are taking longer to assemble and draft.

Thank you,
Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: (b)(6), (b)(7)(C)
Sent: Wednesday, March 09, 2022 2:42 PM
To: @usdoj.gov, @ice.dhs.gov, @hq.dhs.gov
Cc: @ice.dhs.gov, @usa.dhs.gov

Subject: RE: [EXTERNAL] Fraihat

Please find Plaintiffs’ follow-up questions attached. Please have consolidated and reviewed responses back to OIL by COB Tuesday 3/15, so that we can review and get back to Plaintiffs by COB on Wednesday 3/16.

Please also respond to let us know where DHS and ICE are on Plaintiffs’ request regarding an extension of their en banc deadline so that we can get back to them with something today, even if not a final decision.

Thank you.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: (b)(6), (b)(7)(C)
Sent: Wednesday, March 09, 2022 7:37 AM
To: @usdoj.gov, @ice.dhs.gov, @hq.dhs.gov
Cc: @ice.dhs.gov, @usa.dhs.gov

2022-ICLI-00045 5064
Good morning, ICE –

Thank you for the support preparing for and during Monday’s mediation session. As expected due to the timing, there was not a lot of substantive progress made in this session. We noted

We scheduled the next mediation session for April 12, 2022, 11am ET, but Judge Wilner was clear that he did not want to gather everyone again if the parties were not ready to make substantive progress by that date.

Lastly, a reminder that we need DHS and ICE positions on Plaintiffs’ extension request on the en banc rehearing deadline.

Thank you,

Senior Litigation Counsel
U.S. Department of Justice, Civil Division
Office of Immigration Litigation – District Court Section
P.O. Box 868 | Ben Franklin Station | Washington, DC 20044
Direct: (202) 532-68 | Fax: (202) 305-6 | Email
From: [b](6); [b](7)(C)  @usdoj.gov>

Sent: March 2, 2022 4:58 PM

To: [b](6); [b](7)(C)  @ice.dhs.gov>; [b](6); [b](7)(C)  @hq.dhs.gov>

Cc: [b](6); [b](7)(C)  @ice.dhs.gov>; [b](6); [b](7)(C)  @hq.dhs.gov>

Subject: RE: [EXTERNAL] Fraihat

Yes, 60 days.

[b](6); [b](7)(C)

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616 [b](6)

From: [b](6); [b](7)(C)  @uscis.gov>

Sent: Wednesday, March 02, 2022 4:57 PM

To: [b](6); [b](7)(C)  @usdoj.gov>; [b](6); [b](7)(C)  @hq.dhs.gov>

Cc: [b](6); [b](7)(C)  @ice.dhs.gov>; [b](6); [b](7)(C)  @hq.dhs.gov>

[b](6); [b](7)(C)

Loiacono, Adam V  @uscis.gov>
(b)(6); (b)(7)(C) @ice.dhs.gov; Davis, Mike P (b)(6); (b)(7)(C) @ice.dhs.gov

Subject: RE: [EXTERNAL] Fraihat

Thank you, I think that would be helpful.

(b)(6); (b)(7)(C)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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From: (b)(6); (b)(7)(C) @usdoj.gov
Sent: Wednesday, March 2, 2022 4:55 PM
To: (b)(6); (b)(7)(C) @ice.dhs.gov
Cc: (b)(6); (b)(7)(C) @ice.dhs.gov

Subject: RE: [EXTERNAL] Fraihat
I can ask, but I’d imagine another 60 days.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-1246

From: @ice.dhs.gov
Sent: Wednesday, March 02, 2022 4:52 PM
To: @usdoj.gov; @hq.dhs.gov; @ice.dhs.gov; @usdoj.gov; @hq.dhs.gov; @ice.dhs.gov; @usdoj.gov; @hq.dhs.gov; @ice.dhs.gov
Cc: @usdoj.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov

Subject: RE: [EXTERNAL] Fraihat

What is the timeframe Plaintiffs are requesting for another extension? I do not see the draft motion attached.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
WASHINGTON, D.C. 20536
Mobile: (202) 25

--- ATTORNEY/CLIENT PRIVILEGE --- ATTORNEY WORK PRODUCT ---

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From: (b)(6), (b)(7)(C)
Sent: Wednesday, March 2, 2022 3:34 PM
To: (b)(6), (b)(7)(C)
Cc: (b)(6), (b)(7)(C)

Subject: RE: [EXTERNAL] Fraihat

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Please also see below, opposing counsel’s request for a further continuance of their deadline to seek en banc consideration of the Ninth Circuit’s decision. I’d like to be able to get back to them before the end of the week.

If there is concern about the pace of mediation, I would propose that we could agree to one more extension, but that we would need to see progress in mediation before agreeing to any further extensions?

Thanks,
I hope you are doing well. The current deadline for filing a petition for rehearing en banc is April 5, so we would like to get another consent motion for an extension on file next week to allow the mediation efforts to keep proceeding. It seems like Judge Wilner has been helpful and both sides feel that mediation has been productive so far. Please let us know if the attached motion is acceptable to ICE.

Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: [b](b)(6), (b)(7)(C)
Sent: Wednesday, March 02, 2022 12:59 PM
To: [b](b)(6), (b)(7)(C)
Cc: [b](b)(6), (b)(7)(C)

Subject: RE: [EXTERNAL] Fraihat

Please find below Plaintiffs’ response. Please confer and let me know what ICE/DHS prefer. If past practice is any guide, I would recommend a response along these lines:
Thank you for the below information. We will not have time to prepare written responses ahead of our March 7 meeting with your team and Judge Wilner, but we do think a meeting is still worthwhile and will be prepared to discuss the information you’ve shared at that meeting, with a particular focus on: the redetention proposal, the potential revised guidance regarding notice to class members, and consideration of subclass members held under 236c. We will likely primarily seek clarification and more information so that we can fully consider proposals or counter.

I will also under separate cover send you a proposal for moving forward with segregation and disability discussions after we wrap up with the PI, which will hopefully assuage your and your clients’ concern about addressing the whole case. These are the next two topics on our list of topics to cover and we think they can be handled in a similar format, which we will propose. I will get that to you shortly.

Many thanks

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From: [Redacted]
Sent: Friday, February 25, 2022 12:35 PM
To: [Redacted]
Cc: [Redacted]

Subject: RE: [EXTERNAL] Fraihat

Thanks everyone.

From: @hq.dhs.gov
Sent: Friday, February 25, 2022 11:48 AM

To: @hq.dhs.gov, @usdoj.gov
Cc: @ice.dhs.gov, @usdoj.gov, Padilla, Kenneth @ice.dhs.gov, HQ.DHS.GOV, @usdoj.gov, @ice.dhs.gov, @usdoj.gov; Loiacono, Adam V @ice.dhs.gov; Davis, Mike P @ice.dhs.gov

Subject: RE: [EXTERNAL] Fraihat

please see a few edits in the attached.

Best,

Assistant General Counsel for Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(202) 744-2810

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From: [b](6), [b](7)(C) @hq.dhs.gov
Sent: Thursday, February 24, 2022 9:50 PM
To: [b](6), [b](7)(C) @ice.dhs.gov; [b](6), [b](7)(C) @ice.dhs.gov; [b](6), [b](7)(C) @usdoj.gov
Cc: [b](6), [b](7)(C) @hq.dhs.gov; [b](6), [b](7)(C) @ice.dhs.gov; [b](6), [b](7)(C) @hq.dhs.gov; [b](6), [b](7)(C) @usdoj.gov
[b](6), [b](7)(C) @ice.dhs.gov; [b](6), [b](7)(C) @ice.dhs.gov; [b](6), [b](7)(C) @ice.dhs.gov; [b](6), [b](7)(C) @ice.dhs.gov; Padilla, Kenneth [b](6); [b](7)(C) @ice.dhs.gov; [b](6), [b](7)(C) @ice.dhs.gov; [b](6), [b](7)(C) @ice.dhs.gov; [b](6), [b](7)(C) @hq.dhs.gov; [b](6), [b](7)(C) @ice.dhs.gov; [b](6), [b](7)(C) @ice.dhs.gov; [b](6), [b](7)(C) @ice.dhs.gov; [b](6), [b](7)(C) @usdoj.gov; Loiacono, Adam V [b](6), [b](7)(C) @ice.dhs.gov; Davis, Mike P
[b](6), [b](7)(C) @ice.dhs.gov

Subject: RE: [EXTERNAL] Fraihat

H[ ]

Not sure if my earlier email went through. We are finalizing our input. You should hear back from [b](6), [b](7)(C) in my absence.

Kind regards,

[b](6), [b](7)(C)

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(o) (202) 282-5596 (m) (202) 853-2553 [b](6), [b](7)(C)
[b](6), [b](7)(C) hq.dhs.gov

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From: (b)(6); (b)(7)(C) @usdoj.gov
Sent: Thursday, February 24, 2022 9:10 PM
To: @hq.dhs.gov; @ice.dhs.gov
Cc: @hq.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; Padilla, Kenneth
Subject: Re: [EXTERNAL] Fraihat

Anything on this folks? Opposing counsel is checking in on our status so they can move forward with their revised proposal.

Sent from my iPad

On Feb 24, 2022, at 11:18 AM, @usdoj.gov wrote:

Thanks for the call this morning. Please find attached a draft email for opposing counsel that attempts to distill our current positions. I appreciate any comments/edits that can be provided by COB, or let me know if you’ll need longer.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-5171

From: @hq.dhs.gov
Sent: Wednesday, February 23, 2022 2:55 PM
To: @usdoj.gov
Cc: @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov
2022-ICLI-00045

Subject: RE: [EXTERNAL] Fraihat

Thanks, I will coordinate with schedule and link up with ICE to determine a time.

Kind regards,

[Address]

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From: [Email]
Sent: Wednesday, February 23, 2022 2:50 PM
Subject: Re: [EXTERNAL] Fraiha

Thank you. I think a call is still warranted to clear a few of our specific asks up. Can you please propose a time that works tomorrow?

Sent from my iPhone

On Feb 23, 2022, at 11:32 AM, @hq.dhs.gov wrote:

Hi,

Attached please find consolidated/updated input from DHS + ICE and let us know if there’s any more follow up needed before responding. Thanks for your patience.

Kind regards,

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(o) (202) 282-9930
(m) (202) 851-7630

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Sent: Tuesday, February 22, 2022 5:01 PM
Thanks, and I see that the call was just cancelled. Should we still expect updates today, which we will then need to digest and get back to opposing counsel.

Sent from my iPhone

On Feb 22, 2022, at 9:52 AM,写道:

Flagging that DHS and ICE are working on revised responses for DOJ’s review and anticipate canceling this call. We will follow up shortly.

Kind regards,

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(o) (202) 282-4150 (m) (202) 853-4150
d@hq.dhs.gov

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2022-ICLI-00045 5077
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<Fraihat Draft Responses to OIL re Plaintiffs Mediation Follow Ups 2.22.22 (002) (2 23 22 Updated ICE DHS Input).docx>
<Fraihat 2.24 Draft Email to Counsel.docx>
From: [b](b)(6), [b](b)(7)(C)
Sent: Wed, 25 May 2022 18:45:00 +0000
To: [b](b)(6), [b](b)(7)(C)
Cc: [b](b)(6), [b](b)(7)(C)
Subject: RE: [EXTERNAL] Fraihat
Attachments: Fraihat 5.23 Rehearing Extension Motion.pdf, Fraihat 5.25 Rehearing Extension Order.pdf

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Please find attached the extension motion and order just released granting a final 30-day extension.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-...

From: [b](b)(6), [b](b)(7)(C)
Sent: Tuesday, May 24, 2022 11:22 PM
To: @hq.dhs.gov
Cc: Lotacono, Adam V @ice.dhs.gov; @hq.dhs.gov; @ice.dhs.gov; @hq.dhs.gov
Subject: Re: [EXTERNAL] Fraihat

That should not be a problem, they’ve already indicated they would not seek another one in the motion that they filed. I will send that along tomorrow morning.

Sent from my iPhone

On May 24, 2022, at 9:00 PM, @hq.dhs.gov wrote:

one thing I think we need to make sure we’re conveying is that, notwithstanding the next mediation date, we are not going to be willing to agree to another extension of plaintiffs’ rehearing deadline.

Best,

2022-ICLI-00045 5079
Assistant General Counsel for Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(202) 744-2746
bhq.dhs.gov

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From: @ice.dhs.gov
Sent: Monday, May 23, 2022 9:04 PM
To: @usdoj.gov; bhq.dhs.gov
Cc: bhq.dhs.gov; @ice.dhs.gov
Subject: RE: [EXTERNAL] Fraihat

Thanks. We will get folks thinking about those issues as we await a response from Plaintiffs.

Deputy Principal Legal Advisor for Enforcement and Litigation
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
Iphone: 202-50(6) 00(6)

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From: @usdoj.gov
Date: Monday, May 23, 2022, 5:41 PM
To: Loiacono, Adam V @ice.dhs.gov
Cc: bhq.dhs.gov; @ice.dhs.gov
Subject: RE: [EXTERNAL] Fraihat

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Thanks again for sharing this.

Thanks,
Adding a few OPLA folks.

Thanks,

Adam V. Loiacono
Deputy Principal Legal Advisor for Enforcement and Litigation
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
Iphone: 202-500

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Thanks. As currently marked re privilege I would appear to be prohibited from sharing this with opposing counsel in this form or other substance. Can you please confirm what I may share with them, and tweak the headers as needed if I’m cleared to send this counter?

Also, would

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From:

Sent: Monday, May 23, 2022 10:20 AM
To: 
Cc: 

Subject: FW: [EXTERNAL] Fraihat

I am attaching our revised offer. Note that there may be some flexibility on We’re happy to set up a call to discuss.

Best,

Assistant General Counsel for Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(202) 744

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From: usdoj.gov
Sent: Monday, May 23, 2022 10:14 AM
To: ice.dhs.gov, hq.dhs.gov, usdoj.gov
Cc: ice.dhs.gov, hq.dhs.gov, usdoj.gov

Subject: RE: [EXTERNAL] Fraihat

Here is the Zoom info for today.

I would appreciate if I could get

Thanks,

Hi there,

Judge Michael R. Wilner is inviting you to a scheduled ZoomGov meeting.

Join Zoom Meeting

Meeting URL: https://cacd-
uscourts.zoomgov.com/j/1610090070?pwd=L0grVEt2WDgxM2NWEERcN6Zkc5dz9
Meeting ID: 161 009 0070
Passcode: 695025
Join by Telephone

For higher quality, dial a number based on your current location.
Dial:

US: +1 669 254 5252 or +1 669 216 1590 or +1 551 285 1373 or +1 646 828 7666

International numbers

Join from an H.323/SIP room system

H.323: 161.199.138.10 (US West)
       161.199.136.10 (US East)
SIP: 1610900070@sip.zoomgov.com
Passcode: 695025

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Subject: RE: [EXTERNAL] Fraihat

Thank you.

Correspondence from opposing counsel here. Please let me know ICE’s responses to the bolded questions.

If you could please write back to Judge Wilner ASAP to see if Monday 5/23 10 am PT still works for him, explaining the delay in closing the loop with him, and cc’ing me, I’d be grateful.

On the extension motion, my team really can’t afford any further delay. We’d love to be able to file it with your clients’ consent and to ask for an amount of time that’s consistent with your clients’ needs in considering our revised proposal (e.g., 30, 45, or 60 days). If you can assure us that you’ll have an answer on the extension motion ready for us by Monday morning, we can hold off filing before then. If you can’t assure us of that, then we’re going to need to go ahead and file today. **Either way, please let me know ASAP today.**

Additionally, my team would be grateful to know ASAP any questions or concerns your clients have so far about the revised proposal, ideally ahead of the parties’ next meeting with Judge Wilner. **Are there any you can identify? What, otherwise, do you propose for an agenda for the next meeting with Judge Wilner? Please let me know ASAP.**

I’m available for a call today, if that’d be helpful. If you’d like to talk, please let me know when works for you.

If Judge Wilner can’t meet with us on Monday, I’ll update him about the status of what’s been going on between the parties.

Thanks

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-
Both our proposal and potential position on another extension for Plaintiffs to file a petition en banc are currently with the Front Office. We hope to have an update soon.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-9713

--- ATTORNEY/CLIENT PRIVILEGE --- ATTORNEY WORK PRODUCT ---
ICE, despite the ask for a check in yesterday, I have really heard nothing here (other than a side bar question from DHS).

Because Plaintiffs’ en banc filing deadline is June, Ninth Circuit rules require that they file for an extension no later than Monday 5/23. That is why they ask for our position no later than today. If they need to file Monday and we take no position, we will need to come up with a position and/or statement immediately thereafter so that we can file a response – and there will be an implicit message about our views on mediation (which ICE and DHS may have some insight into, but none has been shared with DOJ).

Similarly, we had initially requested responses to Plaintiffs’ latest settlement proposal by May 10, to which we agreed a short extension would be reasonable given developments with the CDC guidance. But now, on the eve of Monday’s mediation session, we have not responded in writing to opposing counsel’s APRIL 18 proposal, and even if ICE submits to DOJ comments or redlines today, we will not be able to review them in any meaningful way to be comfortable providing them to opposing counsel in advance of Monday’s scheduled session.

Please get us answers and updates regarding the en banc extension question and the status of comments on Plaintiffs’ latest proposal immediately.
In addition to needing to convey what the government’s position regarding Plaintiffs’ anticipated extension motion, we need to be able to communicate reasonably with opposing counsel and Magistrate Judge Wilner regarding Monday’s mediation – which DOJ is unable to prepare for.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: [ICE.DDS.GOV]  [ICE.DDS.GOV]  [ICE.DDS.GOV]  [ICE.DDS.GOV]  [ICE.DDS.GOV]
Sent: Thursday, May 19, 2022 10:40 AM
To: [ICE.DDS.GOV]  [ICE.DDS.GOV]  [ICE.DDS.GOV]  [ICE.DDS.GOV]  [ICE.DDS.GOV]
Cc: [ICE.DDS.GOV]  [ICE.DDS.GOV]  [ICE.DDS.GOV]  [ICE.DDS.GOV]  [ICE.DDS.GOV]
Bcc: [ICE.DDS.GOV]  [ICE.DDS.GOV]  [ICE.DDS.GOV]  [ICE.DDS.GOV]  [ICE.DDS.GOV]

Subject: RE: [EXTERNAL] Fraihat

One observation that I’ve been noodling on that may be helpful for ICE’s decision making here.

Please do check in today to let us know where things are, and note that Plaintiffs requested a response by tomorrow and are not unreasonable in wanting to determine if they need to seek a further en banc extension, what they can say with regard to our position, what we all could say with regard to the progress of mediation, and all in time to have a decision from the Ninth Circuit while they approach an important filing deadline for them.
Folks, just checking in on all of this please.

Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-5090

From: [b](b)(6), [b](b)(7)(C)
Sent: Monday, May 16, 2022 2:53 PM
To: [b](b)(6), [b](b)(7)(C)
Cc: [b](b)(6), [b](b)(7)(C)
Bcc: [b](b)(6), [b](b)(7)(C)

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-5090

From: [b](b)(6), [b](b)(7)(C)
Sent: Wednesday, May 18, 2022 12:47 PM
To: [b](b)(6), [b](b)(7)(C)
Cc: [b](b)(6), [b](b)(7)(C)
Bcc: [b](b)(6), [b](b)(7)(C)

Re: [EXTERNAL] Fraihat

Folks, just checking in on all of this please.

Thanks,
and all,

Please see follow-along correspondence from Plaintiffs’ counsel, and initial response to your questions:

The attached correspondence addresses Plaintiffs’ position here, let me know if ICE has additional questions.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616...

From
Sent: Monday, May 16, 2022 1:49 PM
To
Cc
Subject: RE: [EXTERNAL] Fraihat

Hi [b](b)6:

After internal discussions, ICE has a few additional questions for OIL’s consideration and we kindly request legal counsel on next steps, which are consolidated below:

Lastly, ICE is available for the mediation session on May 23 from 1pm-3pm ET. Given the upcoming mediation session, could OIL provide responses to ICE by COB tomorrow, 5/17?

Kind regards,

[b](b)6

[b](b)6

[b](b)5
Associate Legal Advisor  
U.S. Immigration and Customs Enforcement  
Office of the Principal Legal Advisor  
District Court Litigation Division  
500 12th Street SW  
Washington, D.C. 20536  
Mobile: (202) 235-
And on scheduling, both Plaintiffs and the SM indicate that they are available at 10 am PST the morning of 5/23. Can we please confirm and get this scheduled?

Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-...

From: [b](6); [b](7)/(C)
Sent: Monday, May 16, 2022 1:12 PM
To: [b](6); [b](7)/(C)
Cc: [b](6); [b](7)/(C)

Subject: RE: [EXTERNAL] Fraihat

I’ve followed up with them, but I understand that both options are still on the table for them.

One element that we discussed re this proposal (which we haven’t seen yet), would be agreeing to permit ICE some additional time regarding initial screening and custody determinations (although they indicated that something like 60 days to complete a custody redetermination would be too long).

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: @ice.dhs.gov
Sent: Monday, May 16, 2022 8:13 AM
To: @usdoj.gov, @ice.dhs.gov, @hq.dhs.gov, @ice.dhs.gov, @usdoj.gov, @hq.dhs.gov, @usdoj.gov
Cc: @ice.dhs.gov, @ice.dhs.gov, @ice.dhs.gov, @ice.dhs.gov, @ice.dhs.gov

Subject: RE: [EXTERNAL] Fraihat

Are Plaintiffs still working on a proposal to potentially not pursue en banc if ICE agrees to some form of status quo (based on your previous email re the pros and cons of another extension), or is this request for another extension an indication that they decided not to propose a proposal like that?

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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From: @usdoj.gov
Sent: Friday, May 13, 2022 5:31 PM
To: @ice.dhs.gov
Cc: @ice.dhs.gov; @hq.dhs.gov; @usdoj.gov
Subject: Re: [EXTERNAL] Fraihat

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Please see below opposing counsel’s ask for our position on a further en banc extension by COB Monday. I’ve already responded to indicate that we may not be able to get back to them by then. I also don’t have a response by Monday.

If we are going to file another consent extension, we really need to do so ASAP. It tells me that you are still waiting for you’re the agency’s final views. We very much appreciate your efforts in getting an answer. Given the last 9th Circuit order, we will need to be able to tell the Court we are making substantial progress in the negotiations. I would be helpful for you to provide us language you would be comfortable with. And let us know whether you will agree to seeking another 60, or would only agree to 45 or 30.
Could you please get back to us by Monday COB? I feel like we are already late in filing this and want to get it done, if we can.

Thanks,

Sent from my iPhone

On May 13, 2022, at 12:22 PM, [usr]@usdoj.gov> wrote:
Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: [Redacted]
Sent: Friday, May 13, 2022 9:03 AM
To: [Redacted]
Cc: [Redacted]

Subject: Re: [EXTERNAL] Fraihat

Apologies again for the delay. We will get this to you this afternoon.

Sent from my iPhone
On May 10, 2022, at 2:12 PM [b](6); [b](7)(C) @ice.dhs.gov wrote:

Good afternoon [b](6); [b](7)(C),
Following up on your previous request, do you have an estimate on when we can expect OII’s thoughts on agreeing, or not agreeing, to another extension to file the en banc review?

Thanks in advance,
[b](6); [b](7)(C)

Acting Deputy Chief, on detail
Office of the Principal Legal Advisor
District Court Litigation Division
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
p: 404-894-5136
c: 703-235-1754

https://eserviceregistration.ice.gov/

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Thanks

I’ll pass that along and we’ll get you something today.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: @ice.dhs.gov
Sent: Friday, May 06, 2022 12:52 PM
To: @ice.dhs.gov; Padilla, Kenneth
Subject: RE: [EXTERNAL] Fraihat

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Thanks

I’ll pass that along and we’ll get you something today.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: @ice.dhs.gov
Sent: Friday, May 06, 2022 12:52 PM
To: @ice.dhs.gov; Davis, Mike P
Subject: RE: [EXTERNAL] Fraihat

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Thanks

I’ll pass that along and we’ll get you something today.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: @ice.dhs.gov
Sent: Friday, May 06, 2022 12:52 PM
To: @ice.dhs.gov; Loiacono, Adam V
Subject: RE: [EXTERNAL] Fraihat

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Thanks

I’ll pass that along and we’ll get you something today.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-
ICE could be available for the next mediation session on May 23 from 3-5pm ET. Additionally, we are working to have our responses to Plaintiffs’ proposal to OIL by May 10.

Lastly to follow up, is OIL able to provide any pros and cons on possibly agreeing to another extension to file the en banc petition?

Thank you!

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-5685

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Subject: RE: [EXTERNAL] Fraihat

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We’ll get you pros and cons re a further extension today.

Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From: [email]
Sent: Monday, May 02, 2022 9:08 AM
To: [email]
Cc: [email]
Thank you, we are trying to see which of those slots may work.

In the meantime, can OIL provide insights on the pros and cons for agreeing to another extension for plaintiffs to file a petition en banc for ICE to consider as we elevate?

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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Subject: RE: [EXTERNAL] Faihat

I’m looping who may be plugging into this case after today and until a new immigration deputy comes onboard.

Deputy General Counsel
U.S. Department of Homeland Security
(202) 836-3683

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From
Sent: Thursday, April 28, 2022 3:49 PM
To
Cc:

[Redacted]

[Redacted]
Subject: RE: [EXTERNAL] Fraihat

So that attempt at scheduling didn’t work. Here’s Plaintiffs’ response.

Any chance we can work with their hours on 5/17, and if not, what works for ICE the following week?

We can meet between 10:30 and 2:00 Pacific on 5/17. I also should clarify that, based on our previous meetings, we’re working under the assumption that this would be a two-hour session.

In the event the 5/17 times won’t work, our availability the week of May 23 is as follows (all times Pacific):

May 23: any time in the afternoon  
May 24: 1:00p – 3:00p  
May 25: 9:00a – noon  
May 26: 11:30a – 2:00p  
May 27: 10:30a – 4:00p
Hi [redacted],

Yes, we will work to have the proposal to OIL by 5/11 and we will work on a position on another potential extension of the deadline for Plaintiffs’ to file a petition en banc.

Regarding the next mediations session, ICE’s availability is below.

- Monday (May 16)
- Tuesday between 10 and 2 (May 17)
- Friday from 9 to 3 (May 20)

Kind regards,

[redacted]

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253 [redacted]

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Thank you.

Will ICE prepared to have your thoughts to us by the 11th?

And can ICE and DHS get together on views on a further extension of the en banc deadline, which is coming up again in June (so we’re likely going to be asked for our position before we sit down with the mediator again).

Sent from my iPad

On Apr 22, 2022, at 11:21 AM, [ice.dhs.gov] wrote:

ICE request that the mediation session be the third week of May (week of May 16), given the amount of review the proposal would need and in order to have the most productive mediation session. We are gathering availability so we can propose the dates.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253 [ice.dhs.gov]
(b)(6); (b)(7)(C)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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From: ____________________________@usdoj.gov
Sent: Wednesday, March 2, 2022 3:34 PM
To: ____________________________@hq.dhs.gov
Cc: ____________________________@ice.dhs.gov
     ____________________________@ice.dhs.gov
     ____________________________@ice.dhs.gov
     ____________________________@ice.dhs.gov
     ____________________________@ice.dhs.gov
     ____________________________@ice.dhs.gov
Subject: RE: [EXTERNAL] Faihat

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2022-ICLI-00045 5108
Please also see below, opposing counsel’s request for a further continuance of their deadline to seek en banc consideration of the Ninth Circuit’s decision. I’d like to be able to get back to them before the end of the week.

If there is concern about the pace of mediation, I would propose that we could agree to one more extension, but that we would need to see progress in mediation before agreeing to any further extensions?

Thanks,

I hope you are doing well. The current deadline for filing a petition for rehearing en banc is April 5, so we would like to get another consent motion for an extension on file next week to allow the mediation efforts to keep proceeding. It seems like Judge Wilner has been helpful and both sides feel that mediation has been productive so far. Please let us know if the attached motion is acceptable to ICE.

Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-
Please find below Plaintiffs’ response. Please confer and let me know what ICE/DHS prefer. If past practice is any guide, I would recommend a response along these lines:

Hi [b](6) [b](7)(C) (and please feel free to loop in your team).

Thank you for the below information. We will not have time to prepare written responses ahead of our March 7 meeting with your team and Judge Wilner, but we do think a meeting is still worthwhile and will be prepared to discuss the information you’ve shared at that meeting, with a particular focus on: the redetention proposal, the potential revised guidance regarding notice to class members, and consideration of subclass members held under 236c. We will likely primarily seek clarification and more information so that we can fully consider proposals or counter.

I will also send a proposal for moving forward with segregation and disability discussions after we wrap up with the PI, which will hopefully assure you and your clients’ concern about discussing the whole case. These are the next two topics on our list of topics to cover and we think they can be handled in a similar format, which we will propose. I will get that to you shortly.

Many thanks

[b](6); [b](7)(C)

[b](6); [b](7)(C)
Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616- [b](6);

From: [b](6); [b](7)(C)
Sent: Friday, February 25, 2022 12:35 PM
To: [b](6); [b](7)(C)
Cc: [b](6); [b](7)(C)
Thanks everyone.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: (b)(6); (b)(7)
Sent: Friday, February 25, 2022 11:48 AM
To: (b)(6); (b)(7)
Cc: (b)(6); (b)(7)

Subject: RE: [EXTERNAL] Fraihat

(b)(6)- please see a few edits in the attached.

Best,

Assistant General Counsel for Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security

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From: (b)(6); (b)(7)(C) @hq.dhs.gov
Sent: Thursday, February 24, 2022 9:50 PM
To: (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov;
Cc: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov;
(b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov;
(b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov;
(b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov;
(b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov;
(b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;

Subject: RE: [EXTERNAL] Fraihat

Hi (b)(8);

Not sure if my earlier email went through. We are finalizing our input. You should hear back from (b)(6); Smith in my absence.

Kind regards,

(b)(6); (b)(7)(C)
Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security

(202) 740-5112 5112
Anything on this folks? Opposing counsel is checking in on our status so they can move forward with their revised proposal.

Sent from my iPad

On Feb 24, 2022, at 11:18 AM, write wrote:

Thanks for the call this morning. Please find attached a draft email for opposing counsel that attempts to distill our current positions. I appreciate any comments/edits that can be provided by COB, or let me know if you’ll need longer.
Thanks, (b)(6) will coordinate with (b)(6); schedule and link up with ICE to determine a time.

Kind regards,

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(o) (202) 282-616-3 (b)(6); (b)(7)(C)
(b)(6); (b)(7)(C) @hq.dhs.gov

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Thank you. I think a call is still warranted to clear a few of our specific asks up. Can you please propose a time that works tomorrow?

Sent from my iPhone

On Feb 23, 2022, at 11:32 AM, wrote:

Attached please find consolidated/updated input from DHS + ICE and let us know if there’s any more follow up needed before responding. Thanks for your patience.

Kind regards,

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(o) (202) 282-8534 (m) (202) 353-8534

---

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From: (b)(6); (b)(7)(C) @usdoj.gov
Sent: Tuesday, February 22, 2022 5:01 PM
To: (b)(6); (b)(7)(C) @hq.dhs.gov
Cc: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov;
   (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @usdoj.gov;
   (b)(6); (b)(7)(C) @hq.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @usdoj.gov;
   (b)(6); (b)(7)(C) @hq.dhs.gov; Padilla, Kenneth
   (b)(6); (b)(7)(C) @ice.dhs.gov; HQ.DHS.GOV
   (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @usdoj.gov;
   (b)(6); (b)(7)(C) @usdoj.gov;
   (b)(6); (b)(7)(C) @usdoj.gov;
   (b)(6); (b)(7)(C) @usdoj.gov; Davis, Mike P
   (b)(6); (b)(7)(C) @ice.dhs.gov
Subject: Re: [EXTERNAL] Fraihat

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Thanks, and I see that the call was just cancelled. Should we still expect updates today, which we will then need to digest and get back to opposing counsel.

Sent from my iPhone

On Feb 22, 2022, at 9:52 AM (b)(6); (b)(7)(C) @hq.dhs.gov wrote:

Friends—

Flagging that DHS and ICE are working on revised responses for DOJ’s review and anticipate canceling this call. We will follow up shortly.

Kind regards,

(b)(6); (b)(7)(C)
Attorney Advisor, Litigation
areas, and other program areas of an immigration detention facility. *Staff* means employees or contractors of the agency or facility, including any entity that operates within the facility.

*Strip search* means a search that requires a person to remove or arrange some or all clothing so as to permit a visual inspection of the person’s breasts, buttocks, or genitalia.

*Substantiated allegation* means an allegation that was investigated and determined to have occurred.

*Transgender* means a person whose gender identity (i.e., internal sense of feeling male or female) is different from the person’s assigned sex at birth.

*Unfounded allegation* means an allegation that was investigated and determined not to have occurred.

*Unsubstantiated allegation* means an allegation that was investigated and the investigation produced insufficient evidence to make a final determination as to whether or not the event occurred.

*Volunteer* means an individual who donates time and effort on a recurring basis to enhance the activities and programs of the agency or facility.

§ 115.6 Definitions related to sexual abuse and assault.

For purposes of this part, the term—

*Sexual abuse* includes—

1. Sexual abuse and assault of a detainee by another detainee; and

2. Sexual abuse and assault of a detainee by a staff member, contractor, or volunteer.

*Sexual abuse of a detainee by another detainee* includes any of the following acts by one or more detainees, prisoners, inmates, or residents of the facility in which the detainee is housed who, by force, coercion, or intimidation, or if the victim did not consent or was unable to consent or refuse, engages in or attempts to engage in:

1. Contact between the penis and the vulva or anus and, for purposes of this paragraph (1), contact involving the penis upon penetration, however slight;

2. Contact between the mouth and the penis, vulva, or anus;

3. Penetration, however slight, of the anal or genital opening of another person by a hand or finger or by any object that is unrelated to official duties or where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire;

4. Intentional touching of the genitalia, anus, groin, breast, inner thighs or buttocks, either directly or through the clothing, that is unrelated to official duties or where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire;

5. Threats, intimidation, harassment, indecent, profane or abusive language, or other actions or communications, aimed at coercing or pressuring a detainee to engage in a sexual act;

6. Repeated verbal statements or comments of a sexual nature to a detainee;

7. Any display of his or her uncovered genitalia, buttocks, or breast in the presence of an inmate, detainee, or resident, or

8. Voyeurism, which is defined as the inappropriate visual surveillance of a detainee for reasons unrelated to official duties. Where not conducted for reasons related to official duties, the following are examples of voyeurism:

- Staring at a detainee who is using a toilet in his or her cell to perform bodily functions; requiring an inmate detainee to expose his or her buttocks, genitals, or breasts; or taking images of all or part of a detainee’s naked body or of a detainee performing bodily functions.

Subpart A—Standards for Immigration Detention Facilities Coverage

§ 115.10 Coverage of DHS immigration detention facilities.

This subpart covers ICE immigration detention facilities. Standards set forth in this subpart A are not applicable to Department of Homeland Security (DHS) holding facilities.

Prevention Planning

§ 115.11 Zero tolerance of sexual abuse; Prevention of Sexual Assault Coordinator.

(a) The agency shall have a written policy mandating zero tolerance toward all forms of sexual abuse and outlining the agency’s approach to preventing, detecting, and responding to such conduct.

(b) The agency shall employ or designate an upper-level, agency-wide Prevention of Sexual Assault Coordinator (PSA Coordinator) with sufficient time and authority to develop, implement, and oversee agency efforts to comply with these standards in all of its immigration detention facilities.

(c) Each facility shall have a written policy mandating zero tolerance toward all forms of sexual abuse and outlining the facility’s approach to preventing, detecting, and responding to such conduct. The agency shall review and approve each facility’s written policy.

(d) Each facility shall employ or designate a Prevention of Sexual Assault Compliance Manager (PSA Compliance Manager) who shall serve as the facility point of contact for the agency PSA Coordinator and who has sufficient time and authority to oversee facility efforts to comply with facility sexual abuse prevention and intervention policies and procedures.

§ 115.12 Contracting with non-DHS entities for the confinement of detainees.

(a) When contracting for the confinement of detainees in immigration detention facilities operated by non-DHS private or public agencies or other entities, including other government agencies, the agency shall include in any new contracts, contract renewals, or substantive contract modifications the entity’s obligation to adopt and comply with these standards.

(b) Any new contracts, contract renewals, or substantive contract modifications shall provide for agency contract monitoring to ensure that the contractor is complying with these standards.

§ 115.13 Detainee supervision and monitoring.

(a) Each facility shall ensure that it maintains sufficient supervision of detainees, including through appropriate staffing levels and, where applicable, video monitoring, to protect detainees against sexual abuse.

(b) Each facility shall develop and document comprehensive detainee supervision guidelines to determine and meet the facility’s detainee supervision needs, and shall review those guidelines at least annually.
(c) In determining adequate levels of detainee supervision and determining the need for video monitoring, the facility shall take into consideration generally accepted detention and correctional practices, any judicial findings of inadequacy, the physical layout of each facility, the composition of the detainee population, the prevalence of substantiated and unsubstantiated incidents of sexual abuse, the findings and recommendations of sexual abuse incident review reports, and any other relevant factors, including but not limited to the length of time detainees spend in agency custody.

(d) Each facility shall conduct frequent unannounced security inspections to deter and detect sexual abuse of detainees. Such inspections shall be implemented for night as well as day shifts. Each facility shall prohibit staff from alerting others that these security inspections are occurring, unless such announcement is related to the legitimate operational functions of the facility.

§ 115.14 Juvenile and family detainees.

(a) Juveniles shall be detained in the least restrictive setting appropriate to the juvenile’s age and special needs, provided that such setting is consistent with the need to protect the juvenile’s well-being and that of others, as well as with any other laws, regulations, or legal requirements.

(b) The facility shall hold juveniles apart from adult detainees, minimizing sight, sound, and physical contact, unless the juvenile is in the presence of an adult member of the facility unit, and provided there are no safety or security concerns with the arrangement.

(c) In determining the existence of a family unit for detention purposes, the agency shall seek to obtain reliable evidence of a family relationship.

(d) The agency and facility shall provide priority attention to unaccompanied alien children as defined by 6 U.S.C. 279(g)(2), including transfer to a Department of Health and Human Services Office of Refugee Resettlement facility within 72 hours, except in exceptional circumstances, in accordance with 8 U.S.C. 1232(b)(3).

(e) If a juvenile who is an unaccompanied alien child has been convicted as an adult of a crime related to sexual abuse, the agency shall provide the facility and the Department of Health and Human Services Office of Refugee Resettlement with the releasable information regarding the conviction(s) to ensure the appropriate placement of the alien in a Department of Health and Human Services Office of Refugee Resettlement facility.

§ 115.15 Limits to cross-gender viewing and searches.

(a) Searches may be necessary to ensure the safety of officers, civilians and detainees; to detect and secure evidence of criminal activity; and to promote security, safety, and related interests at immigration detention facilities.

(b) Cross-gender pat-down searches of male detainees shall not be conducted unless, after reasonable diligence, staff of the same gender is not available at the time the pat-down search is required or in exigent circumstances.

(c) Cross-gender pat-down searches of female detainees shall not be conducted unless in exigent circumstances.

(d) All cross-gender pat-down searches shall be documented.

(e) Cross-gender strip searches or cross-gender visual body cavity searches shall not be conducted except in exigent circumstances, including consideration of officer safety, or when performed by medical practitioners. Facility staff shall not conduct visual body cavity searches of juveniles and, instead, shall refer all such body cavity searches of juveniles to a medical practitioner.

(f) All strip searches and visual body cavity searches shall be documented.

(g) Each facility shall implement policies and procedures that enable detainees to shower, perform bodily functions, and change clothing without being viewed by staff of the opposite gender, except in exigent circumstances or when such viewing is incidental to routine cell checks or is otherwise appropriate in connection with a medical examination or monitored bowel movement. Such policies and procedures shall require staff of the opposite gender to announce their presence when entering an area where detainees are likely to be showering, performing bodily functions, or changing clothing.

(h) The facility shall permit detainees in Family Residential Facilities to shower, perform bodily functions, and change clothing without being viewed by staff, except in exigent circumstances or when such viewing is incidental to routine cell checks or otherwise appropriate in connection with a medical examination or monitored bowel movement.

(i) The facility shall not search or physically examine a detainee for the sole purpose of determining the detainee’s genital characteristics. If the detainee’s gender is unknown, it may be determined during conversations with the detainee, by reviewing medical records, or, if necessary, learning that information as part of a standard medical examination that all detainees must undergo as part of intake or other processing procedure conducted in private, by a medical practitioner.

(j) The agency shall train security staff in proper procedures for conducting pat-down searches, including cross-gender pat-down searches and searches of transgender and intersex detainees. All pat-down searches shall be conducted in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs and agency policy, including consideration of officer safety.

§ 115.16 Accommodating detainees with disabilities and detainees who are limited English proficient.

(a) The agency and each facility shall take appropriate steps to ensure that detainees with disabilities (including, for example, detainees who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities) have an equal opportunity to participate in or benefit from all aspects of the agency’s and facility’s efforts to prevent, detect, and respond to sexual abuse. Such steps shall include, when necessary to ensure effective communication with detainees who are deaf or hard of hearing, providing access to in-person, telephonic, or video interpretive services that enable effective, accurate, and impartial interpretation, both receptively and expressively, using any necessary specialized vocabulary. In addition, the agency and facility shall ensure that any written materials related to sexual abuse are provided in formats or through methods that ensure effective communication with detainees with disabilities, including detainees who have intellectual disabilities, limited reading skills, or who are blind or have low vision. An agency or facility is not required to take actions that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity, or in undue financial and administrative burdens, as those terms are used in regulations promulgated under title II of the Americans with Disabilities Act, 28 C.F.R. 35.164.

(b) The agency and each facility shall take steps to ensure meaningful access to all aspects of the agency’s and facility’s efforts to prevent, detect, and respond to sexual abuse to detainees who are limited English proficient, including steps to provide in-person or telephonic interpretive services that enable effective, accurate, and impartial
interpretation, both receptively and expressively, using any necessary specialized vocabulary.

(c) In matters relating to allegations of sexual abuse, the agency and each facility shall provide in-person or telephonic interpretation services that enable effective, accurate, and impartial interpretation, by someone other than another detainee, unless the detainee expresses a preference for another detainee to provide interpretation and the agency determines that such interpretation is appropriate and consistent with DHS policy. The provision of interpreter services by minors, alleged abusers, detainees who witnessed the alleged abuse, and detainees who have a significant relationship with the alleged abuser is not appropriate in matters relating to allegations of sexual abuse.

§ 115.17 Hiring and promotion decisions.

(a) An agency or facility shall not hire or promote anyone who may have contact with detainees, and shall not enlist the services of any contractor or volunteer who may have contact with detainees, who has engaged in sexual abuse in a prison, jail, holding facility, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997); who has been convicted of engaging or attempting to engage in sexual activity facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or who has been civilly or administratively adjudicated to have engaged in such activity.

(b) An agency or facility considering hiring or promoting staff shall ask all applicants who may have contact with detainees directly about previous misconduct described in paragraph (a) of this section, in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees. Agencies and facilities shall also impose upon employees a continuing affirmative duty to disclose any such misconduct. The agency, consistent with law, shall make its best efforts to contact all prior institutional employers of an applicant for employment, to obtain information on substantiated allegations of sexual abuse or any resignation during a pending investigation of alleged sexual abuse.

(c) Before hiring new staff who may have contact with detainees, the agency or facility shall conduct a background investigation to determine whether the candidate for hire is suitable for employment with the facility or agency, including a criminal background records check. Upon request by the agency, the facility shall submit for the agency’s approval written documentation showing the detailed elements of the facility’s background check for each staff member and the facility’s conclusions. The agency shall conduct an updated background investigation every five years for agency employees who may have contact with detainees. The facility shall require an updated background investigation every five years for those facility staff who may have contact with detainees and who work in immigration-only detention facilities.

(d) The agency or facility shall also perform a background investigation before enlisting the services of any contractor who may have contact with detainees. Upon request by the agency, the facility shall submit for the agency’s approval written documentation showing the detailed elements of the facility’s background check for each contractor and the facility’s conclusions.

(e) Material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination or withdrawal of an offer of employment, as appropriate.

(f) Unless prohibited by law, the agency shall provide information on substantiated allegations of sexual abuse involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.

(g) In the event the agency contracts with a facility for the confinement of detainees, the requirements of this section otherwise applicable to the agency also apply to the facility and its staff.

§ 115.18 Upgrades to facilities and technologies.

(a) When designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, the facility or agency, as appropriate, shall consider the effect of the design, acquisition, expansion, or modification upon their ability to protect detainees from sexual abuse.

(b) When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology in an immigration detention facility, the facility or agency, as appropriate, shall consider how such technology may enhance their ability to protect detainees from sexual abuse.

Responsive Planning

§ 115.21 Evidence protocols and forensic medical examinations.

(a) To the extent that the agency or facility is responsible for investigating allegations of sexual abuse involving detainees, it shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. The protocol shall be developed in coordination with DHS and shall be developmentally appropriate for juveniles, where applicable.

(b) The agency and each facility developing an evidence protocol referred to in paragraph (a) of this section, shall consider how best to utilize available community resources and services to provide valuable expertise and support in the areas of crisis intervention and counseling to most appropriately address victims’ needs. Each facility shall establish procedures to make available, to the full extent possible, outside victim services following incidents of sexual abuse; the facility shall attempt to make available to the victim a victim advocate from a rape crisis center. If a rape crisis center is not available to provide victim advocate services, the agency shall provide these services by making available a qualified staff member from a community-based organization, or a qualified agency staff member. A qualified agency staff member or a qualified community-based staff member means an individual who has received education concerning sexual assault and forensic examination issues in general. The outside or internal victim advocate shall provide emotional support, crisis intervention, information, and referrals.

(c) Where evidentiarily or medically appropriate, at no cost to the detainee, and only with the detainee’s consent, the facility shall arrange for an alleged victim detainee to undergo a forensic medical examination by qualified health care personnel, including a Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) where practicable. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified health care personnel.

(d) As requested by a victim, the presence of his or her outside or internal victim advocate, including any available victim advocacy services offered by a hospital conducting a forensic exam, shall be allowed for support during a forensic exam and investigatory interviews.
(e) To the extent that the agency is not responsible for investigating allegations of sexual abuse, the agency or the facility shall request that the investigating agency follow the requirements of paragraphs (a) through (d) of this section.

§ 115.22 Policies to ensure investigation of allegations and appropriate agency oversight.

(a) The agency shall establish an agency protocol, and shall require each facility to establish a facility protocol, to ensure that each allegation of sexual abuse is investigated by the agency or facility, or referred to an appropriate investigative authority. The agency shall ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse.

(b) The agency shall ensure that the agency and facility protocols required by paragraph (a) of this section, include a description of responsibilities of the agency, the facility, and any other investigating entities; and require the documentation and maintenance, for at least five years, of all reports and referrals of allegations of sexual abuse.

(c) The agency shall post its protocols on its Web site; each facility shall also post its protocols on its Web site, if it has one, or otherwise make the protocol available to the public.

(d) Each facility protocol shall ensure that all allegations are promptly reported to the agency as described in paragraphs (e) and (f) of this section, and, unless the allegation does not involve potentially criminal behavior, are promptly referred for investigation to an appropriate law enforcement agency with the legal authority to conduct criminal investigations. A facility may separately, and in addition to the above reports and referrals, conduct its own investigation.

(e) When a detainee, prisoner, inmate, or resident of the facility in which an alleged detainee victim is housed is alleged to be the perpetrator of detainee sexual abuse, the facility shall ensure that the incident is promptly reported to the Joint Intake Center, the ICE Office of Professional Responsibility or the DHS Office of Inspector General, as well as to the appropriate ICE Field Office Director, and to the local government entity or contractor that owns or operates the facility. If the incident is of potentially criminal, the facility shall ensure that it is promptly referred to an appropriate law enforcement agency having jurisdiction for investigation.

(g) The agency shall ensure that all allegations of detainee sexual abuse are promptly reported to the PSA Coordinator and to the appropriate offices within the agency and within DHS to ensure appropriate oversight of the investigation.

(h) The agency shall ensure that any alleged detainee victim of sexual abuse that is criminal in nature is provided timely access to U nonimmigrant status information.

Training and Education

§ 115.31 Staff training.

(a) The agency shall train, or require the training of, all employees who may have contact with immigration detainees, and all facility staff, to be able to fulfill their responsibilities under this part, including training on:

(1) The agency’s and the facility’s zero-tolerance policies for all forms of sexual abuse;

(2) The right of detainees and staff to be free from sexual abuse, and from retaliation for reporting sexual abuse;

(3) Definitions and examples of prohibited and illegal sexual behavior;

(4) Recognition of situations where sexual abuse may occur;

(5) Recognition of physical, behavioral, and emotional signs of sexual abuse, and methods of preventing and responding to such occurrences;

(6) How to avoid inappropriate relationships with detainees;

(7) How to communicate effectively and professionally with detainees, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming detainees;

(8) Procedures for reporting knowledge or suspicion of sexual abuse; and

(9) The requirement to limit reporting of sexual abuse to personnel with a need-to-know in order to make decisions concerning the victim’s welfare and for law enforcement or investigative purposes.

(b) All current facility staff, and all agency employees who may have contact with immigration detention facility detainees, shall be trained within one year of May 6, 2014, and the agency or facility shall provide refresher information every two years.

(c) The agency and each facility shall document that staff that may have contact with immigration facility detainees have completed the training.

§ 115.32 Other training.

(a) The facility shall ensure that all volunteers and other contractors (as defined in paragraph (d) of this section) who have contact with detainees have been trained on their responsibilities under the agency’s and the facility’s sexual abuse prevention, detection, intervention and response policies and procedures.

(b) The level and type of training provided to volunteers and other contractors shall be based on the services they provide and level of contact they have with detainees, but all volunteers and other contractors who have contact with detainees shall be notified of the agency’s and the facility’s zero-tolerance policies regarding sexual abuse and informed how to report such incidents.

(c) Each facility shall receive and maintain written confirmation that volunteers and other contractors who have contact with immigration facility detainees have completed the training.

(d) In this section, the term other contractor means a person who provides services on a non-recurring basis to the facility pursuant to a contractual agreement with the agency or facility.

§ 115.33 Detainee education.

(a) During the intake process, each facility shall ensure that the detainee orientation program notifies and informs detainees about the agency’s and the facility’s zero-tolerance policies for all forms of sexual abuse and includes (at a minimum) instruction on:

(1) Prevention and intervention strategies;

(2) Definitions and examples of detainee-on-detainee sexual abuse, staff-on-detainee sexual abuse and coercive sexual activity;

(3) Explanation of methods for reporting sexual abuse, including to any staff member, including a staff member other than an immediate point-of-contact line officer (e.g., the compliance manager or a mental health specialist), the DHS Office of Inspector General, and the Joint Intake Center;

(4) Information about self-protection and indicators of sexual abuse;

(5) Prohibition against retaliation, including an explanation that reporting sexual abuse shall not negatively impact the detainee’s immigration proceedings; and

(6) The right of a detainee who has been subjected to sexual abuse to receive treatment and counseling.
(b) Each facility shall provide the detainee notification, orientation, and instruction in formats accessible to all detainees, including those who are limited English proficient, deaf, visually impaired or otherwise disabled, as well as to detainees who have limited reading skills.

(c) The facility shall maintain documentation of detainee participation in the intake process orientation.

(d) Each facility shall post on all housing unit bulletin boards the following notices:

(1) The DHS-prescribed sexual assault awareness notice;

(2) The name of the Prevention of Sexual Abuse Compliance Manager; and

(3) The name of local organizations that can assist detainees who have been victims of sexual abuse.

(e) The facility shall make available and distribute the DHS-prescribed “Sexual Assault Awareness Information” pamphlet.

(f) Information about reporting sexual abuse shall be included in the agency Detainee Handbook made available to all immigration detention facility detainees.

§ 115.34 Specialized training: Investigations.

(a) In addition to the general training provided to all facility staff and employees pursuant to § 115.31, the agency or facility shall provide specialized training on sexual abuse and effective cross-agency coordination to agency or facility investigators, respectively, who conduct investigations into allegations of sexual abuse in immigration detention facilities. All investigations into alleged sexual abuse must be conducted by qualified investigators.

(b) The agency and facility must maintain written documentation verifying specialized training provided to investigators pursuant to this section.

§ 115.35 Specialized training: Medical and mental health care.

(a) The agency shall provide specialized training to DHS or agency employees who serve as full- and part-time medical practitioners or full- and part-time mental health practitioners in immigration detention facilities where medical and mental health care is provided.

(b) The training required by this section shall cover, at a minimum, the following topics:

(1) How to detect and assess signs of sexual abuse;

(2) How to respond effectively and professionally to victims of sexual abuse,

(3) How and to whom to report allegations or suspicions of sexual abuse, and

(4) How to preserve physical evidence of sexual abuse. If medical staff employed by the agency conduct forensic examinations, such medical staff shall receive the appropriate training to conduct such examinations.

(c) The agency shall review and approve the facility’s policy and procedures to ensure that facility medical staff is trained in procedures for examining and treating victims of sexual abuse, in facilities where medical staff may be assigned these activities.

Assessment for Risk of Sexual Victimization and Abusiveness

§ 115.41 Assessment for risk of victimization and abusiveness.

(a) The facility shall assess all detainees on intake to identify those likely to be sexual aggressors or sexual abuse victims and shall house detainees to prevent sexual abuse, taking necessary steps to mitigate any such danger. Each new arrival shall be kept separate from the general population until he/she is classified and may be housed accordingly.

(b) The initial classification process and initial housing assignment should be completed within twelve hours of admission to the facility.

(c) The facility shall also consider, to the extent that the information is available, the following criteria to assess detainees for risk of sexual victimization:

(1) Whether the detainee has a mental, physical, or developmental disability;

(2) The age of the detainee;

(3) The physical build and appearance of the detainee;

(4) Whether the detainee has previously been incarcerated or detained;

(5) The nature of the detainee’s criminal history;

(6) Whether the detainee has any convictions for sex offenses against an adult or child;

(7) Whether the detainee has self-identified as gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;

(8) Whether the detainee has self-identified as having previously experienced sexual victimization; and

(9) The detainee’s own concerns about his or her physical safety.

(d) The initial screening shall consider prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to the facility, in assessing detainees for risk of being sexually abusive.

(e) The facility shall reassess each detainee’s risk of victimization or abusiveness between 60 and 90 days from the date of initial assessment, and at any other time when warranted based upon the receipt of additional, relevant information or following an incident of abuse or victimization.

(f) Detainees shall not be disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (c)(1), (c)(7), (c)(8), or (c)(9) of this section.

(g) The facility shall implement appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the detainee’s detriment by staff or other detainees or inmates.

§ 115.42 Use of assessment information.

(a) The facility shall use the information from the risk assessment under § 115.41 of this part to inform assignment of detainees to housing, recreation and other activities, and voluntary work. The agency shall make individualized determinations about how to ensure the safety of each detainee.

(b) When making assessment and housing decisions for a transgender or intersex detainee, the facility shall consider the detainee’s gender self-identification and an assessment of the effects of placement on the detainee’s health and safety. The facility shall consult a medical or mental health professional as soon as practicable on this assessment. The facility should not base placement decisions of transgender or intersex detainees solely on the identity documents or physical anatomy of the detainee; a detainee’s self-identification of his/her gender and self-assessment of safety needs shall always be taken into consideration as well. The facility’s placement of a transgender or intersex detainee shall be consistent with the safety and security considerations of the facility, and placement and programming assignments for each transgender or intersex detainee shall be reassessed at least twice each year to review any threats to safety experienced by the detainee.

(c) When operationally feasible, transgender and intersex detainees shall be given the opportunity to shower separately from other detainees.

§ 115.43 Protective custody.

(a) The facility shall develop and follow written procedures consistent with the standards in this subpart for
each facility governing the management of its administrative segregation unit. These criteria should be developed in consultation with the ICE Enforcement and Removal Operations Field Office Director having jurisdiction for the facility, must document detailed reasons for placement of an individual in administrative segregation on the basis of a vulnerability to sexual abuse or assault.

(b) Use of administrative segregation by facilities to protect detainees vulnerable to sexual abuse or assault shall be restricted to those instances where reasonable efforts have been made to provide appropriate housing and shall be made for the least amount of time practicable, and when no other viable housing options exist, as a last resort. The facility should assign detainees vulnerable to sexual abuse or assault to administrative segregation for their protection until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days.

(c) Facilities that place vulnerable detainees in administrative segregation for protective custody shall provide those detainees access to programs, visitation, counsel and other services available to the general population to the maximum extent practicable.

(d) Facilities shall implement written procedures for the regular review of all vulnerable detainees placed in administrative segregation for their protection, as follows:

1. A supervisory staff member shall conduct a review within 72 hours of the detainee’s placement in administrative segregation to determine whether segregation is still warranted; and
2. A supervisory staff member shall conduct, at a minimum, an identical review after the detainee has spent seven days in administrative segregation, and every week thereafter for the first 30 days, and every 10 days thereafter.

(e) Facilities shall notify the appropriate ICE Field Office Director no later than 72 hours after the initial placement into segregation, whenever a detainee has been placed in administrative segregation on the basis of a vulnerability to sexual abuse or assault.

(f) Upon receiving notification pursuant to paragraph (e) of this section, the ICE Field Office Director shall review the placement and consider:

1. Whether continued placement in administrative segregation is warranted;
2. Whether any alternatives are available and appropriate, such as placing the detainee in a less restrictive housing option at another facility or other appropriate custodial options; and
3. Whether the placement is only as a last resort and when no other viable housing options exist.

§ 115.51 Detainee reporting.

(a) The agency and each facility shall develop policies and procedures to ensure that detainees have multiple ways to privately report sexual abuse, retaliation for reporting sexual abuse, or staff neglect or violations of responsibilities that may have contributed to such incidents. The agency and each facility shall also provide instructions on how detainees may contact their consular official, the DHS Office of the Inspector General or, as appropriate, another designated office, to confidentially and, if desired, anonymously, report such incidents.

(b) The agency shall also provide, and the facility shall inform the detainees of, at least one way for detainees to report sexual abuse to a public or private entity or office that is not part of the agency, and that is able to receive and immediately forward detainee reports of sexual abuse to agency officials, allowing the detainee to remain anonymous upon request.

(c) Facility policies and procedures shall include provisions for staff to accept reports made verbally, in writing, anonymously, and from third parties and to promptly document any verbal reports.

§ 115.52 Grievances.

(a) The facility shall permit a detainee to file a formal grievance related to sexual abuse at any time during, after, or in lieu of lodging an informal grievance or complaint.

(b) The facility shall not impose a time limit on when a detainee may submit a grievance regarding an allegation of sexual abuse.

(c) The facility shall implement written procedures for identifying and handling time-sensitive grievances that involve an immediate threat to detainee health, safety, or welfare related to sexual abuse.

(d) Facility staff shall bring medical emergencies to the immediate attention of proper medical personnel for further assessment.

(e) The facility shall issue a decision on the grievance within five days of receipt and shall respond to an appeal of the grievance decision within 30 days. Facilities shall send all grievances related to sexual abuse and the facility’s decisions with respect to such grievances to the appropriate ICE Field Office Director at the end of the grievance process.

(f) To prepare a grievance, a detainee may obtain assistance from another detainee, the housing officer or other facility staff, family members, or legal representatives. Staff shall take reasonable steps to expedite requests for assistance from these other parties.

§ 115.53 Detainee access to outside confidential support services.

(a) Each facility shall utilize available community resources and services to provide valuable expertise and support in the areas of crisis intervention, counseling, investigation and the prosecution of sexual abuse perpetrators to most appropriately address victims’ needs. The facility shall maintain or attempt to enter into memoranda of understanding or other agreements with community service providers or, if local providers are not available, with national organizations that provide legal advocacy and confidential emotional support services for immigrant victims of crime.

(b) Each facility’s written policies shall establish procedures to include outside agencies in the facility’s sexual abuse prevention and intervention protocols, if such resources are available.

(c) Each facility shall make available to detainees information about local organizations that can assist detainees who have been victims of sexual abuse, including mailing addresses and telephone numbers (including toll-free hotline numbers where available). If no such local organizations exist, the facility shall make available the same information about national organizations. The facility shall enable reasonable communication between detainees and these organizations and agencies, in as confidential a manner as possible.

(d) Each facility shall inform detainees, prior to giving them access to outside resources, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws.

§ 115.54 Third-party reporting.

Each facility shall establish a method to receive third-party reports of sexual abuse in its immigration detention facilities and shall make available to the public information on how to report sexual abuse on behalf of a detainee.
Official Response Following a Detainee Report

§ 115.61 Staff reporting duties.

(a) The agency and each facility shall require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse that occurred in a facility; retaliation against detainees or staff who reported or participated in an investigation about such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. The agency shall review and approve facility policies and procedures and shall ensure that the facility specifies appropriate reporting procedures, including a method by which staff can report outside of the chain of command.

(b) Staff members who become aware of alleged sexual abuse shall immediately follow the reporting requirements set forth in the agency's and facility's written policies and procedures.

(c) Apart from such reporting, staff shall not reveal any information related to a sexual abuse report to anyone other than to the extent necessary to help protect the safety of the victim or prevent further victimization of other detainees or staff in the facility, or to make medical treatment, investigation, law enforcement, or other security and management decisions.

(d) If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, the agency shall report the allegation to the designated State or local services agency under applicable mandatory reporting laws.

§ 115.62 Protection duties.

If an agency employee or facility staff member has a reasonable belief that a detainee is subject to a substantial risk of imminent sexual abuse, he or she shall take immediate action to protect the detainee.

§ 115.63 Reporting to other confinement facilities.

(a) Upon receiving an allegation that a detainee was sexually abused while confined at another facility, the agency or facility whose staff received the allegation shall notify the appropriate office of the agency or the administrator of the facility where the alleged abuse occurred.

(b) The notification provided in paragraph (a) of this section shall be provided as soon as possible, but no later than 72 hours after receiving the allegation.

(c) The agency or facility shall document that it has provided such notification.

(d) The agency or facility office that receives such notification, to the extent the facility is covered by this subpart, shall ensure that the allegation is referred for investigation in accordance with these standards and reported to the appropriate ICE Field Office Director.

§ 115.64 Responder duties.

(a) Upon learning of an allegation that a detainee was sexually abused, the first security staff member to respond to the report, or his or her supervisor, shall be required to:

(1) Separate the alleged victim and abuser;

(2) Preserve and protect, to the greatest extent possible, any crime scene until appropriate steps can be taken to collect any evidence;

(3) If the abuse occurred within a time period that still allows for the collection of physical evidence, request the alleged victim not to take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and

(4) If the sexual abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.

(b) If the first staff responder is not a security staff member, the responder shall be required to ensure that the alleged victim not take any actions that could destroy physical evidence and then notify security staff.

§ 115.65 Coordinated response.

(a) Each facility shall develop a written institutional plan to coordinate actions taken by facility first responders, medical and mental health practitioners, investigators, and facility leadership in response to an incident of sexual abuse.

(b) Each facility shall use a coordinated, multidisciplinary team approach to responding to sexual abuse.

(c) If a victim of sexual abuse is transferred between facilities covered by subpart A or B of this part, the sending facility shall, as permitted by law, inform the receiving facility of the incident and the victim's potential need for medical or social services.

(d) If a victim is transferred from a DHS immigration detention facility to a facility not covered by paragraph (c) of this section, the sending facility shall, as permitted by law, inform the receiving facility of the incident and the victim's potential need for medical or social services, unless the victim requests otherwise.

§ 115.66 Protection of detainees from contact with alleged abusers.

(a) Staff, contractors, and volunteers suspected of perpetrating sexual abuse shall be removed from all duties requiring detainee contact pending the outcome of an investigation.

§ 115.67 Agency protection against retaliation.

(a) Staff, contractors, and volunteers, and immigration detention facility detainees, shall not retaliate against any person, including a detainee, who reports, complains about, or participates in an investigation into an allegation of sexual abuse, or for participating in sexual activity as a result of force, coercion, threats, or fear of force.

(b) The agency shall employ multiple protection measures, such as housing changes, removal of alleged staff or detainee abusers from contact with victims, and emotional support services for detainees or staff who fear retaliation for reporting sexual abuse or for cooperating with investigations.

(c) For at least 90 days following a report of sexual abuse, the agency and facility shall monitor to see if there are facts that may suggest possible retaliation by detainees or staff, and shall act promptly to remedy any such retaliation. Items the agency should monitor may include any detainee disciplinary reports, housing or program changes, or negative performance reviews or reassignments of staff. DHS shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need.

§ 115.68 Post-allegation protective custody.

(a) The facility shall take care to place detainee victims of sexual abuse in a supportive environment that represents the least restrictive housing option possible [e.g., protective custody], subject to the requirements of § 115.43.

(b) Detainee victims shall not be held for longer than five days in any type of administrative segregation, except in highly unusual circumstances or at the request of the detainee.

(c) A detainee victim who is in protective custody after having been subjected to sexual abuse shall not be returned to the general population until completion of a proper reassessment, taking into consideration any increased vulnerability of the detainee as a result of the sexual abuse.

(d) Facilities shall notify the appropriate ICE Field Office Director.
whenever a detainee victim has been
held in administrative segregation for 72
hours or more.
(e) Upon receiving notification that a
detainee victim has been held in
administrative segregation, the ICE Field
Office Director shall review the
placement and consider:
(1) Whether the placement is only as a
last resort and when no other viable
housing options exist; and
(2) In cases where the detainee has
been held in administrative segregation
for longer than 5 days, whether the
placement is justified by highly unusual
circumstances or at the detainee’s
request.
Investigations
§ 115.71 Criminal and administrative
investigations.
(a) If the facility has responsibility for
investigating allegations of sexual abuse,
all investigations into alleged sexual
abuse must be prompt, thorough,
objective, and conducted by specially
trained, qualified investigators.
(b) Upon conclusion of a criminal
investigation where the allegation was
substantiated, an administrative
investigation shall be conducted. Upon
conclusion of a criminal investigation
where the allegation was
unsubstantiated, the facility shall
review any available completed
criminal investigation reports to
determine whether an administrative
investigation is necessary or
appropriate. Administrative
investigations shall be conducted after
consultation with the appropriate
investigative office within DHS, and the
assigned criminal investigative entity.
(c) (1) The facility shall develop
written procedures for administrative
investigations, including provisions
requiring:
(i) Preservation of direct and
circumstantial evidence, including any
available physical and DNA evidence
and any available electronic monitoring
data;
(ii) Interviewing alleged victims,
suspected perpetrators, and witnesses;
(iii) Reviewing prior complaints and
reports of sexual abuse involving the
suspected perpetrator;
(iv) Assessment of the credibility of
an alleged victim, suspect, or witness,
without regard to the individual’s status
as detainee, staff, or employee, and
without requiring any detainee who
alleges sexual abuse to submit to a
polygraph;
(v) An effort to determine whether
actions or failures to act at the facility
contributed to the abuse; and
(vi) Documentation of each
investigation by written report, which
shall include a description of the
physical and testimonial evidence, the
reasoning of credibility assessments, and investigative facts and
findings; and
(vii) Retention of such reports for as
long as the alleged abuser is detained or
employed by the agency or facility, plus
five years.
(2) Such procedures shall govern the
coordinating and sequencing of the two
types of investigations, in accordance
with paragraph (b) of this section, to
ensure that the criminal investigation is
not compromised by an internal
administrative investigation.
(d) The agency shall review and
approve the facility policy and
procedures for coordination and
conduct of internal administrative
investigations with the assigned
criminal investigative entity to ensure
non-interference with criminal
investigations.
(e) The departure of the alleged abuser
or victim from the employment or
control of the facility or agency shall not
provide a basis for terminating an
investigation.
(f) When outside agencies investigate
sexual abuse, the facility shall cooperate
with outside investigators and shall
effort to remain informed about the
progress of the investigation.
§ 115.72 Evidentiary standard for
administrative investigations.
When an administrative investigation
is undertaken, the agency shall impose
no standard higher than a
preponderance of the evidence in
determining whether allegations of
sexual abuse are substantiated.
§ 115.73 Reporting to detainees.
The agency shall, when the detainee
is still in immigration detention, or
where otherwise feasible, following an
investigation into a detainee’s allegation
of sexual abuse, notify the detainee as
to the result of the investigation and any
responsive action taken.
Discipline
§ 115.76 Disciplinary sanctions for staff.
(a) Staff shall be subject to
disciplinary or adverse action up to and
including removal from their position
and the Federal service for substantiated
allegations of sexual abuse or for
violating agency or facility sexual abuse
policies.
(b) The agency shall review and
approve facility policies and procedures
regarding disciplinary or adverse
actions for staff and shall ensure that the
facility policy and procedures specify
disciplinary or adverse actions for staff,
up to and including removal from their
position and from the Federal service,
when there is a substantiated allegation
of sexual abuse, or when there has been
a violation of agency sexual abuse rules,
policies, or standards. Removal from
their position and from the Federal
service is the presumptive disciplinary
sanction for staff who have engaged in
or attempted or threatened to engage in
sexual abuse, as defined under the
definition of sexual abuse of a detainee
by a staff member, contractor, or
volunteer, paragraphs (1)–(4) and (7)–(8)
of the definition of “sexual abuse of a
detainee by a staff member, contractor,
or volunteer” in § 115.6.
(c) Each facility shall report all
removals or resignations in lieu of
removal for violations of agency or
facility sexual abuse policies to
appropriate law enforcement agencies,
unless the activity was clearly not
criminal.
(d) Each facility shall make reasonable
efforts to report removals or resignations
in lieu of removal for violations of
agency or facility sexual abuse policies
to any relevant licensing bodies, to the
extent known.
§ 115.78 Disciplinary sanctions for
detainees.
(a) Each facility shall subject a
detainee to disciplinary sanctions
pursuant to a formal disciplinary
process following an administrative or
criminal finding that the detainee
engaged in sexual abuse.
(b) At all steps in the disciplinary
process provided in paragraph (a), any
sanctions imposed shall be
commensurate with the severity of the
committed prohibited act and intended
to encourage the detainee to conform with rules and regulations in the future.

(c) Each facility holding detainees in custody shall have a detainee disciplinary system with progressive levels of reviews, appeals, procedures, and documentation procedure.

(d) The disciplinary process shall consider whether a detainee’s mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.

(e) The facility shall not discipline a detainee for sexual contact with staff unless there is a finding that the staff member did not consent to such contact.

(f) For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.

Medical and Mental Care

§ 115.81 Medical and mental health assessments; history of sexual abuse.

(a) If the assessment pursuant to § 115.41 indicates that a detainee has experienced prior sexual victimization or perpetrated sexual abuse, staff shall, as appropriate, ensure that the detainee is immediately referred to a qualified medical or mental health practitioner for medical and/or mental health follow-up as appropriate.

(b) When a referral for medical follow-up is initiated, the detainee shall receive a health evaluation no later than two working days from the date of assessment.

(c) When a referral for mental health follow-up is initiated, the detainee shall receive a mental health evaluation no later than 72 hours after the referral.

§ 115.82 Access to emergency medical and mental health services.

(a) Detainee victims of sexual abuse shall have timely, unimpeded access to emergency medical treatment and crisis intervention services, including emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care.

(b) Emergency medical treatment services provided to the victim shall be without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

§ 115.83 Ongoing medical and mental health care for sexual abuse victims and abusers.

(a) Each facility shall offer medical and mental health evaluation and, as appropriate, treatment to all detainees who have been victimized by sexual abuse while in immigration detention.

(b) The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody.

(c) The facility shall provide such victims with medical and mental health services consistent with the community level of care.

(d) Detainee victims of sexually abusive vaginal penetration by a male abuser while incarcerated shall be offered pregnancy tests. If pregnancy results from an instance of sexual abuse, the victim shall receive timely and comprehensive information about lawful pregnancy-related medical services and timely access to all lawful pregnancy-related medical services.

(e) Detainee victims of sexual abuse while detained shall be offered tests for sexually transmitted infections as medically appropriate.

(f) Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

(g) The facility shall attempt to conduct a mental health evaluation of all known detainee-on-detainee abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners.

Data Collection and Review

§ 115.86 Sexual abuse incident reviews.

(a) Each facility shall conduct a sexual abuse incident review at the conclusion of every investigation of sexual abuse and, where the allegation was not determined to be unfounded, prepare a written report within 30 days of the conclusion of the investigation recommending whether the allegation or investigation indicates that a change in policy or practice could better prevent, detect, or respond to sexual abuse. The facility shall implement the recommendations for improvement, or shall document its reasons for not doing so in a written report. Both the report and response shall be forwarded to the agency’s PSA Coordinator.

(b) The review team shall consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility.

(c) Each facility shall conduct an annual review of all sexual abuse investigations and resulting incident reviews to assess and improve sexual abuse intervention, prevention and response efforts. If the facility has not had any reports of sexual abuse during the annual reporting period, then the facility shall prepare a negative report. The results and findings of the annual review shall be provided to the facility administrator, Field Office Director or his or her designee, and the agency’s PSA Coordinator.

§ 115.87 Data collection.

(a) Each facility shall maintain in a secure area all case records associated with claims of sexual abuse, including incident reports, investigative reports, offender information, case disposition, medical and counseling evaluation findings, and recommendations for post-release treatment, if necessary, and/or counseling in accordance with these standards and applicable agency policies, and in accordance with established schedules. The DHS Office of Inspector General shall maintain the official investigative file related to claims of sexual abuse investigated by the DHS Office of Inspector General.

(b) On an ongoing basis, the PSA Coordinator shall work with relevant facility PSA Compliance Managers and DHS entities to share data regarding effective agency response methods to sexual abuse.

(c) On a regular basis, the PSA Coordinator shall prepare a report for ICE leadership compiling information received about all incidents or allegations of sexual abuse of detainees in immigration detention during the period covered by the report, as well as ongoing investigations and other pending cases.

(d) On an annual basis, the PSA Coordinator shall aggregate, in a manner that will facilitate the agency’s ability to detect possible patterns and help prevent future incidents, the incident-based sexual abuse data, including the number of reported sexual abuse allegations determined to be substantiated, unsubstantiated, or unfounded, or for which investigation is ongoing, and for each incident found to be substantiated, information concerning:

(1) The date, time, location, and nature of the incident;
(2) The demographic background of the victim and perpetrator (including citizenship, age, gender, and whether either has self-identified as gay, lesbian, bisexual, transgender, intersex, or gender nonconforming);

(3) The reporting timeline for the incident (including the name of individual who reported the incident, and the date and time the report was received);

(4) Any injuries sustained by the victim;

(5) Post-report follow up responses and action taken by the facility (e.g., housing placement/custody classification, medical examination, mental health counseling, etc.); and

(6) Any sanctions imposed on the perpetrator.

(e) Upon request, the agency shall provide all data described in this section from the previous calendar year to the Office for Civil Rights and Civil Liberties no later than June 30.

§ 115.88 Data review for corrective action.

(a) The agency shall review data collected and aggregated pursuant to § 115.87 of this part in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by:

(1) Identifying problem areas;

(2) Taking corrective action on an ongoing basis; and

(3) Preparing an annual report of its findings and corrective actions for each immigration detention facility, as well as the agency as a whole.

(b) Such report shall include a comparison of the current year’s data and corrective actions with those from prior years and shall provide an assessment of the agency’s progress in preventing, detecting, and responding to sexual abuse.

(c) The agency’s report shall be approved by the agency head and made readily available to the public through its Web site.

(d) The agency may redact specific material from the reports, when appropriate for safety or security, but must indicate the nature of the material redacted.

§ 115.89 Data storage, publication, and destruction.

(a) The agency shall ensure that data collected pursuant to § 115.87 are securely retained in accordance with agency record retention policies and the agency protocol regarding investigation of allegations.

(b) The agency shall make all aggregated sexual abuse data from immigration detention facilities under its direct control and from any private agencies with which it contracts available to the public at least annually on its Web site consistent with existing agency information disclosure policies and processes.

(c) Before making aggregated sexual abuse data publicly available, the agency shall remove all personal identifiers.

(d) The agency shall maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise.

Audits and Compliance

§ 115.93 Audits of standards.

(a) During the three-year period starting on July 6, 2015, and during each three-year period thereafter, the agency shall ensure that each immigration detention facility that has adopted these standards is audited at least once.

(b) The agency may require an expedited audit if the agency has reason to believe that a particular facility may be experiencing problems relating to sexual abuse. The agency may also include referrals to resources that may assist the facility with PREA-related issues.

(c) Audits under this section shall be conducted pursuant to §§ 115.201 through 115.205.

(d) Audits under this section shall be coordinated by the agency with the DHS Office for Civil Rights and Civil Liberties, which may request an expedited audit if it has reason to believe that an expedited audit is appropriate.

Additional Provisions in Agency Policies

§ 115.95 Additional provisions in agency policies.

The regulations in this subpart A establish minimum requirements for agencies and facilities. Agency and facility policies may include additional requirements.

Subpart B—Standards for DHS Holding Facilities Coverage

§ 115.110 Coverage of DHS holding facilities.

This subpart B covers all DHS holding facilities. Standards found in subpart A of this part are not applicable to DHS facilities except ICE immigration detention facilities.
incident review reports, and any other relevant factors, including but not limited to the length of time detainees spend in agency custody.

§ 115.114 Juvenile and family detainees.
(a) Juveniles shall be detained in the least restrictive setting appropriate to the juvenile’s age and special needs, provided that such setting is consistent with the need to protect the juvenile’s well-being and that of others, as well as with any other laws, regulations, or legal requirements.

(b) Unaccompanied juveniles shall generally be held separately from adult detainees. The juvenile may temporarily remain with a non-parental adult family member where:
(1) The family relationship has been vetted to the extent feasible, and
(2) The agency determines that remaining with the non-parental adult family member is appropriate, under the totality of the circumstances.

§ 115.115 Limits to cross-gender viewing and searches.
(a) Searches may be necessary to ensure the safety of officers, civilians and detainees; to detect and secure evidence of criminal activity; and to promote security, safety, and related interests at DHS holding facilities.

(b) Cross-gender strip searches or cross-gender visual body cavity searches shall not be conducted except in exigent circumstances, including consideration of officer safety, or when performed by medical practitioners. An agency shall not conduct visual body cavity searches of juveniles and, instead, shall refer all such body cavity searches of juveniles to a medical practitioner.

(c) All strip searches and visual body cavity searches shall be documented.

(d) The agency shall implement policies and procedures that enable detainees to shower (where showers are available), perform bodily functions, and change clothing without being viewed by staff of the opposite gender, except in exigent circumstances or when such viewing is incidental to routine cell checks or is otherwise appropriate in connection with a medical examination or monitored bowel movement under medical supervision. Such policies and procedures shall require staff of the opposite gender to announce their presence when entering an area where detainees are likely to be showering, performing bodily functions, or changing clothing.

(e) The agency and facility shall not search or physically examine a detainee for the sole purpose of determining the detainee’s gender. If the detainee’s gender is unknown, it may be determined during conversations with the detainee, reviewing medical records (if available), or, if necessary, learning that information as part of a broader medical examination conducted in private, by a medical practitioner.

(f) The agency shall train law enforcement staff in proper procedures for conducting pat-down searches, including cross-gender pat-down searches and searches of transgender and intersex detainees. All pat-down searches shall be conducted in a professional and respectful manner, and, in the least intrusive manner possible, consistent with security needs and agency policy, including consideration of officer safety.

§ 115.116 Accommodating detainees with disabilities and detainees who are limited English proficient.
(a) The agency shall take appropriate steps to ensure that detainees with disabilities (including, for example, detainees who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of the agency’s efforts to prevent, detect, and respond to sexual abuse. Such steps shall include, when necessary to ensure effective communication with detainees who are deaf or hard of hearing, providing access to in-person, telephonic, or video interpretive services that enable effective, accurate, and impartial interpretation, both receptively and expressively, using any necessary specialized vocabulary. In addition, the agency shall ensure that any written materials related to sexual abuse are provided in formats or through methods that ensure effective communication with detainees with disabilities, including detainees who have intellectual disabilities, limited reading skills, or who are blind or have low vision. An agency is not required to take actions that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity, or in undue financial and administrative burdens, as those terms are used in regulations promulgated under title II of the Americans with Disabilities Act, 28 CFR 35.164.

(b) The agency shall take reasonable steps to ensure meaningful access to all aspects of the agency’s efforts to prevent, detect, and respond to sexual abuse to detainees who are limited English proficient, including steps to provide in-person or telephonic interpretive services that enable effective, accurate, and impartial interpretation, both receptively and expressively, using any necessary specialized vocabulary.

(c) In matters relating to allegations of sexual abuse, the agency shall provide in-person or telephonic interpretation services that enable effective, accurate, and impartial interpretation, by someone other than another detainee, unless the detainee expresses a preference for another detainee to provide interpretation, and the agency determines that such interpretation is appropriate and consistent with DHS policy. The provision of interpreter services by minors, alleged abusers, detainees who witnessed the alleged abuse, and detainees who have a significant relationship with the alleged abuser is not appropriate in matters relating to allegations of sexual abuse is not appropriate in matters relating to allegations of sexual abuse.

§ 115.117 Hiring and promotion decisions.
(a) The agency shall not hire or promote anyone who may have contact with detainees, and shall not enlist the services of any contractor or volunteer who may have contact with detainees, who has engaged in sexual abuse in a prison, jail, holding facility, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997); who has been convicted of engaging or attempting to engage in sexual activity facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or who has been civilly or administratively adjudicated to have engaged in such activity.

(b) When the agency is considering hiring or promoting staff, it shall ask all applicants who may have contact with detainees directly about previous misconduct described in paragraph (a) of this section, in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees. The agency shall also impose upon employees a continuing affirmative duty to disclose any such misconduct.

(c) Before hiring new employees who may have contact with detainees, the agency shall require a background investigation to determine whether the candidate for hire is suitable for employment with the agency. The agency shall conduct an updated background investigation for agency employees every five years.

(d) The agency shall also perform a background investigation before
enlisting the services of any contractor who may have contact with detainees.

(e) Material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination or withdrawal of an offer of employment, as appropriate.

(f) Unless prohibited by law, the agency shall provide information on substantiated allegations of sexual abuse involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.

(g) In the event the agency contracts with a facility for the confinement of detainees, the requirements of this section otherwise applicable to the agency also apply to the facility.

§ 115.118 Upgrades to facilities and technologies.

(a) When designing or acquiring any new holding facility and in planning any substantial expansion or modification of existing holding facilities, the agency shall consider the effect of the design, acquisition, expansion, or modification upon the agency’s ability to protect detainees from sexual abuse.

(b) When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology in a holding facility, the agency shall consider how such technology may enhance the agency’s ability to protect detainees from sexual abuse.

Responsive Planning

§ 115.121 Evidence protocols and forensic medical examinations.

(a) To the extent that the agency is responsible for investigating allegations of sexual abuse in its holding facilities, the agency shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. The protocol shall be developed in coordination with DHS and shall be developmentally appropriate for juveniles, where applicable.

(b) In developing the protocol referred to in paragraph (a) of this section, the agency shall consider how best to utilize available community resources and services to provide valuable expertise and support in the areas of crisis intervention and counseling to most appropriately address victims’ needs.

(c) Where evidentially or medically appropriate, at no cost to the detainee, and only with the detainee’s consent, the agency shall arrange for or refer the alleged victim detainee to a medical facility to undergo a forensic medical examination, including a Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) where practicable. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified health care personnel.

(d) If, in connection with an allegation of sexual abuse, the detainee is transported for a forensic examination to an outside hospital that offers victim advocacy services, the detainee shall be permitted to use such services to the extent available, consistent with security needs.

(e) To the extent that the agency is not responsible for investigating allegations of sexual abuse, the agency shall request that the investigating agency follow the requirements of paragraphs (a) through (d) of this section.

§ 115.122 Policies to ensure investigation of allegations and appropriate agency oversight.

(a) The agency shall establish a protocol to ensure that each allegation of sexual abuse is investigated by the agency, or referred to an appropriate investigative authority.

(b) The agency protocol shall be developed in coordination with DHS investigative entities; shall include a description of the responsibilities of both the agency and the investigative entities; and shall require the documentation and maintenance, for at least five years, of all reports and referrals of allegations of sexual abuse. The agency shall post its protocol on its Web site, redacted if appropriate.

(c) The agency protocol shall ensure that each allegation is promptly reported to the Joint Intake Center and, unless the allegation does not involve potentially criminal behavior, promptly referred for investigation to an appropriate law enforcement agency with the legal authority to conduct criminal investigations. The agency may separately, and in addition to the above reports and referrals, conduct its own investigation.

(d) The agency shall ensure that all allegations of detainee sexual abuse are promptly reported to the PSA Coordinator and to the appropriate offices within the agency and within DHS to ensure appropriate oversight of the investigation.

(e) The agency shall ensure that any alleged detainee victim of sexual abuse that is criminal in nature is provided timely access to U nonimmigrant status information.

Training and Education

§ 115.131 Employee, contractor, and volunteer training.

(a) The agency shall train, or require the training of all employees, contractors, and volunteers who may have contact with holding facility detainees, to be able to fulfill their responsibilities under these standards, including training on:

(1) The agency’s zero-tolerance policies for all forms of sexual abuse;

(2) The right of detainees and employees to be free from sexual abuse, and from retaliation for reporting sexual abuse;

(3) Definitions and examples of prohibited and illegal sexual behavior;

(4) Recognition of situations where sexual abuse may occur;

(5) Recognition of physical, behavioral, and emotional signs of sexual abuse, and methods of preventing such occurrences;

(6) Procedures for reporting knowledge or suspicion of sexual abuse;

(7) How to communicate effectively and professionally with detainees, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming detainees; and

(8) The requirement to limit reporting of sexual abuse to personnel with a need-to-know in order to make decisions concerning the victim’s welfare and for law enforcement or investigative purposes.

(b) All current employees, contractors and volunteers who may have contact with holding facility detainees shall be trained within two years of the effective date of these standards, and the agency shall provide refresher information, as appropriate.

(c) The agency shall document those employees who may have contact with detainees have completed the training and receive and maintain for at least five years confirmation that contractors and volunteers have completed the training.

§ 115.132 Notification to detainees of the agency’s zero-tolerance policy.

The agency shall publicize its zero-tolerance policy regarding sexual abuse and ensure that key information regarding the agency’s zero-tolerance policy is visible or continuously and readily available to detainees, for example, through posters, detainee handbooks, or other written formats.

§ 115.133 [Reserved]

§ 115.134 Specialized training: Investigations.

(a) In addition to the training provided to employees, DHS agencies
with responsibility for holding facilities shall provide specialized training on sexual abuse and effective cross-agency coordination to agency investigators who conduct investigations into allegations of sexual abuse at holding facilities. All investigations into alleged sexual abuse must be conducted by qualified investigators.

(b) The agency must maintain written documentation verifying specialized training provided to agency investigators pursuant to this section.

**Assessment for Risk of Sexual Victimization and Abusiveness**

§ 115.141 Assessment for risk of victimization and abusiveness.

(a) Before placing any detainees together in a holding facility, agency staff shall consider whether, based on the information before them, a detainee may be at a high risk of being sexually abused and, when appropriate, shall take necessary steps to mitigate any such danger to the detainee.

(b) All detainees who may be held overnight with other detainees shall be assessed to determine their risk of being sexually abused by other detainees or sexually abusive toward other detainees; staff shall ask each such detainee about his or her own concerns about his or her physical safety.

(c) The agency shall also consider, to the extent that the information is available, the following criteria to assess detainees for risk of sexual victimization:

(1) Whether the detainee has a mental, physical, or developmental disability;
(2) The age of the detainee;
(3) The physical build and appearance of the detainee;
(4) Whether the detainee has previously been incarcerated or detained;
(5) The nature of the detainee’s criminal history; and
(6) Whether the detainee has any convictions for sex offenses against an adult or child;
(7) Whether the detainee has self-identified as gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;
(8) Whether the detainee has self-identified as having previously experienced sexual victimization; and
(9) The detainee’s own concerns about his or her physical safety.

(d) If detainees are identified pursuant to the assessment under this section to be at high risk of victimization, staff shall provide such detainees with heightened protection, to include continuous direct sight and sound supervision, single-cell housing, or placement in a cell actively monitored on video by a staff member sufficiently proximate to intervene, unless no such option is determined to be feasible.

(e) The facility shall implement appropriate controls on the dissemination of sensitive information provided by detainees under this section.

**Reporting**

§ 115.151 Detainee reporting.

(a) The agency shall develop policies and procedures to ensure that the detainees have multiple ways to privately report sexual abuse, retaliation for reporting sexual abuse, or staff neglect or violations of responsibilities that may have contributed to such incidents, and shall provide instructions on how detainees may contact the DHS Office of the Inspector General or, as appropriate, another designated office, to confidentially and, if desired, anonymously, report these incidents.

(b) The agency shall also provide, and shall inform the detainees of, at least one way for detainees to report sexual abuse to a public or private entity or office that is not part of the agency, and that is able to receive and immediately forward detainee reports of sexual abuse to agency officials, allowing the detainee to remain anonymous upon request.

(c) Agency policies and procedures shall include provisions for staff to accept reports made verbally, in writing, anonymously, and from third parties and to promptly document any verbal reports.

§ 115.152–115.153 [Reserved]

§ 115.154 Third-party reporting.

The agency shall establish a method to receive third-party reports of sexual abuse in its holding facilities. The agency shall make available to the public information on how to report sexual abuse on behalf of a detainee.

**Official Response Following a Detainee Report**

§ 115.161 Staff reporting duties.

(a) The agency shall require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse that occurred to any detainee; retaliation against detainees or staff who reported or participated in an investigation about such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Agency policy shall include methods by which staff can report misconduct outside of their chain of command.

(b) Staff members who become aware of alleged sexual abuse shall immediately follow the reporting requirements set forth in the agency’s written policies and procedures.

(c) Apart from such reporting, the agency and staff shall not reveal any information related to a sexual abuse report to anyone other than to the extent necessary to help protect the safety of the victim or prevent further victimization of other detainees or staff in the facility, or to make medical treatment, investigation, law enforcement, or other security and management decisions.

(d) If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, the agency shall report the allegation to the designated State or local services agency under applicable mandatory reporting laws.

§ 115.162 Agency protection duties.

When an agency employee has a reasonable belief that a detainee is subject to a substantial risk of imminent sexual abuse, he or she shall take immediate action to protect the detainee.

§ 115.163 Reporting to other confinement facilities.

(a) Upon receiving an allegation that a detainee was sexually abused while confined at another facility, the agency that received the allegation shall notify the appropriate office of the agency or the administrator of the facility where the alleged abuse occurred.

(b) The notification provided in paragraph (a) of this section shall be provided as soon as possible, but no later than 72 hours after receiving the allegation.

(c) The agency shall document that it has provided such notification.

(d) The agency office that receives such notification, to the extent the facility is covered by this subpart, shall ensure that the allegation is referred for investigation in accordance with these standards.

§ 115.164 Responder duties.

(a) Upon learning of an allegation that a detainee was sexually abused, the first law enforcement staff member to respond to the report, or his or her supervisor, shall be required to:

(1) Separate the alleged victim and abuser;
(2) Preserve and protect, to the greatest extent possible, any crime scene until appropriate steps can be taken to collect any evidence;
(3) If the sexual abuse occurred within a time period that still allows for the collection of physical evidence, request the alleged victim not to take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and

(4) If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating;

(b) If the first staff responder is not a law enforcement staff member, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and then notify law enforcement staff.

§ 115.165 Coordinated response.

(a) The agency shall develop a written institutional plan and use a coordinated, multidisciplinary team approach to responding to sexual abuse.

(b) If a victim of sexual abuse is transferred between facilities covered by subpart A or B of this part, the agency shall, as permitted by law, inform the receiving facility of the incident and the victim’s potential need for medical or social services.

(c) If a victim is transferred from a DHS holding facility to a facility not covered by paragraph (b) of this section, the agency shall, as permitted by law, inform the receiving facility of the incident and the victim’s potential need for medical or social services, unless the victim requests otherwise.

§ 115.166 Protection of detainees from contact with alleged abusers.

Agency management shall consider whether any staff, contractor, or volunteer alleged to have perpetrated sexual abuse should be removed from duties requiring detainee contact pending the outcome of an investigation, and shall so do if the seriousness and plausibility of the allegation make removal appropriate.

§ 115.167 Agency protection against retaliation.

Agency employees shall not retaliate against any person, including a detainee, who reports, complains about, or participates in an investigation into an allegation of sexual abuse, or for participating in sexual activity as a result of force, coercion, threats, or fear of force.

Investigations
§ 115.171 Criminal and administrative investigations.

(a) If the agency has responsibility for investigating allegations of sexual abuse, all investigations into alleged sexual abuse must be prompt, thorough, objective, and conducted by specially trained, qualified investigators.

(b) Upon conclusion of a criminal investigation where the allegation was substantiated, an administrative investigation shall be conducted. Upon conclusion of a criminal investigation where the allegation was unsubstantiated, the agency shall review any available completed criminal investigation reports to determine whether an administrative investigation is necessary or appropriate.

Administrative investigations shall be conducted after consultation with the appropriate investigative office within DHS and the assigned criminal investigative entity.

(c) The agency shall develop written procedures for administrative investigations, including provisions requiring:

(1) Preservation of direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data;

(2) Interviewing alleged victims, suspected perpetrators, and witnesses;

(3) Reviewing prior complaints and reports of sexual abuse involving the suspected perpetrator;

(4) Assessment of the credibility of an alleged victim, suspect, or witness, without regard to the individual’s status as detainee, staff, or employee, and without requiring any detainee who alleges sexual abuse to submit to a polygraph;

(5) Documentation of each investigation by written report, which shall include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings; and

(6) Retention of such reports for as long as the alleged abuser is detained or employed by the agency, plus five years. Such procedures shall establish the coordination and sequencing of the two types of investigations, in accordance with paragraph (b) of this section, to ensure that the criminal investigation is not compromised by an internal administrative investigation.

(d) The departure of the alleged abuser or victim from the employment or control of the agency shall not provide a basis for terminating an investigation.

(e) When outside agencies investigate sexual abuse, the agency shall cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation.

§ 115.172 Evidentiary standard for administrative investigations.

When an administrative investigation is undertaken, the agency shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse are substantiated.

Discipline
§ 115.176 Disciplinary sanctions for staff.

(a) Staff shall be subject to disciplinary or adverse action up to and including removal from their position and the Federal service for substantiated allegations of sexual abuse or violating agency sexual abuse policies.

(b) The agency shall review and approve policy and procedures regarding disciplinary or adverse action for staff and shall ensure that the policy and procedures specify disciplinary or adverse actions for staff, up to and including removal from their position and from the Federal service, when there is a substantiated allegation of sexual abuse, or when there has been a violation of agency sexual abuse rules, policies, or standards. Removal from their position and from the Federal service is the presumptive disciplinary sanction for staff who have engaged in or attempted or threatened to engage in sexual abuse, as defined under the definition of sexual abuse of a detainee by a staff member, contractor, or volunteer, paragraphs (1)–(4) and (7)–(8) of the definition of “sexual abuse of a detainee by a staff member, contractor, or volunteer” in § 115.6.

(c) Each facility shall report all removals or resignations in lieu of removal for violations of agency or facility sexual abuse policies to appropriate law enforcement agencies, unless the activity was clearly not criminal.

(d) Each agency shall make reasonable efforts to report removals or resignations in lieu of removal for violations of agency or facility sexual abuse policies to any relevant licensing bodies, to the extent known.

§ 115.177 Corrective action for contractors and volunteers.

(a) Any contractor or volunteer suspected of perpetrating sexual abuse shall be prohibited from contact with detainees. The agency shall also consider whether to prohibit further contact with detainees by contractors or volunteers who have not engaged in
sexual abuse, but have violated other provisions within these standards. The agency shall be responsible for promptly reporting sexual abuse allegations and incidents involving alleged contractor or volunteer perpetrators to an appropriate law enforcement agency as well as to the Joint Intake Center or another appropriate DHS investigative office in accordance with DHS policies and procedures. The agency shall make reasonable efforts to report to any relevant licensing body, to the extent known, incidents of substantiated sexual abuse by a contractor or volunteer.

(b) Contractors and volunteers suspected of perpetrating sexual abuse may be removed from all duties requiring detainee contact pending the outcome of an investigation, as appropriate.

Medical and Mental Care

§ 115.181 [Reserved]

§ 115.182 Access to emergency medical services.

(a) Detainee victims of sexual abuse shall have timely, unimpeded access to emergency medical treatment and crisis intervention services, including emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care.

(b) Emergency medical treatment services provided to the victim shall be without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

Data Collection and Review

§ 115.186 Sexual abuse incident reviews.

(a) The agency shall conduct a sexual abuse incident review at the conclusion of every investigation of sexual abuse and, where the allegation was not determined to be unfounded, prepare a written report recommending whether the allegation or investigation indicates that a change in policy or practice could better prevent, detect, or respond to sexual abuse. Such review shall ordinarily occur within 30 days of the agency receiving the investigation results from the investigative authority. The agency shall implement the recommendations for improvement, or shall document its reasons for not doing so in a written response. Both the report and response shall be forwarded to the agency PSA Coordinator.

(b) The agency shall conduct an annual review of all sexual abuse investigations and resulting incident reviews to assess and improve sexual abuse intervention, prevention and response efforts.

§ 115.187 Data collection.

(a) The agency shall maintain in a secure area all agency case records associated with claims of sexual abuse, in accordance with these standards and applicable agency policies, and in accordance with established schedules. The DHS Office of Inspector General shall maintain the official investigative file related to claims of sexual abuse investigated by the DHS Office of Inspector General.

(b) On an annual basis, the PSA Coordinator shall aggregate, in a manner that will facilitate the agency’s ability to detect possible patterns and help prevent future incidents, the incident-based sexual abuse data available, including the number of reported sexual abuse allegations determined to be substantiated, unsubstantiated, or unfounded, or for which investigation is ongoing, and for each incident found to be substantiated, such information as is available to the PSA Coordinator concerning:

1. The date, time, location, and nature of the incident;
2. The demographic background of the victim and perpetrator (including citizenship, age, gender, and whether either has self-identified as gay, lesbian, bisexual, transgender, intersex, or gender nonconforming);
3. The reporting timeline for the incident (including the name of individual who reported the incident, and the date and time the report was received);
4. Any injuries sustained by the victim;
5. Post-report follow up responses and action taken by the agency (e.g., supervision, referral for medical or mental health services, etc.); and
6. Any sanctions imposed on the perpetrator.

(c) The agency shall maintain, review, and collect data as needed from all available agency records.

§ 115.188 Data review for corrective action.

(a) The agency shall review data collected and aggregated pursuant to §115.187 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by:

1. Identifying problem areas; and
2. Taking corrective action on an ongoing basis; and
3. Preparing an annual report of its findings and corrective actions for the agency as a whole.

(b) Such report shall include a comparison of the current year’s data and corrective actions with those from prior years and shall provide an assessment of the agency’s progress in preventing, detecting, and responding to sexual abuse.

(c) The agency’s report shall be approved by the agency head and made available to the public through its Web site.

(d) The agency may redact specific material from the reports, when appropriate for safety or security, but must indicate the nature of the material redacted.

§ 115.189 Data storage, publication, and destruction.

(a) The agency shall ensure that data collected pursuant to §115.187 are securely retained in accordance with agency record retention policies and the agency protocol regarding investigation of allegations.

(b) The agency shall make all aggregated sexual abuse data from holding facilities under its direct control and from any private agencies with which it contracts available to the public at least annually on its Web site consistent with agency information disclosure policies and processes.

(c) Before making aggregated sexual abuse data publicly available, the agency shall remove all personal identifiers.

(d) The agency shall maintain sexual abuse data collected pursuant to §115.187 for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise.

Audits and Compliance

§ 115.193 Audits of standards.

(a) Within three years of July 6, 2015, the agency shall ensure that each of its immigration holding facilities that houses detainees overnight and has adopted these standards is audited. For any such holding facility established after July 6, 2015, the agency shall ensure that the facility is audited within three years. Audits of new holding facilities as well as holding facilities that have previously failed to meet the standards shall occur as soon as practicable within the three-year cycle; however, where it is necessary to prioritize, priority shall be given to facilities that have previously failed to meet the standards.
Audits required under this paragraph (a) shall:

(i) Include a determination whether the holding facility is low-risk based on its physical characteristics and whether it passes the audit conducted pursuant to paragraph (a)(1)(ii) of this section,

(ii) Be conducted pursuant to §§ 115.201 through 115.205, and

(iii) Be coordinated by the agency with the DHS Office for Civil Rights and Civil Liberties, which may request an expedited audit if it has reason to believe that an expedited audit is appropriate.

(2) [Reserved]

(b) Following an audit, the agency shall ensure that any immigration holding facility that houses detainees overnight and is determined to be low-risk, based on its physical characteristics and whether it passes the audit conducted pursuant to paragraph (b)(1)(iii) of this section,

(ii) Be conducted pursuant to §§ 115.201 through 115.205, and

(iii) Be coordinated by the agency with the DHS Office for Civil Rights and Civil Liberties, which may request an expedited audit if it has reason to believe that an expedited audit is appropriate.

(1) Audits required under this paragraph (c) shall:

(i) Include a determination whether the holding facility is low-risk based on its physical characteristics and whether it passes the audit conducted pursuant to paragraph (c)(1)(iii) of this section,

(ii) Be conducted pursuant to §§ 115.201 through 115.205, and

(iii) Be coordinated by the agency with the DHS Office for Civil Rights and Civil Liberties, which may request an expedited audit if it has reason to believe that an expedited audit is appropriate.

(2) [Reserved]

Additional Provisions in Agency Policies

§ 115.195 Additional provisions in agency policies.

The regulations in this subpart B establish minimum requirements for agencies. Agency policies may include additional requirements.

Subpart C—External Auditing and Corrective Action

§ 115.201 Scope of audits.

(a) The agency shall develop and issue an instrument that is coordinated with the DHS Office for Civil Rights and Civil Liberties, which will provide guidance on the conduct of and contents of the audit.

(b) The auditor shall review all relevant agency policies, procedures, reports, internal and external audits, and certifications for each facility type.

(c) The auditor shall review at a minimum, a sampling of relevant documents and other records and information for the most recent one-year period.

(d) The auditor shall have access to, and shall observe, all areas of the audited facilities.

(e) The agency shall provide the auditor with relevant documentation to complete a thorough audit of the facility.

(f) The auditor shall retain all documentation (including, e.g., videotapes and interview notes) relied upon in making audit determinations. Such documentation shall be provided to the agency upon request.

(g) The auditor shall interview a representative sample of detainees and of staff, and the facility shall make space available suitable for such interviews.

(h) The auditor shall review a sampling of any available videotapes and other electronically available data that may be relevant to the provisions being audited.

(i) The auditor shall be permitted to conduct private interviews with detainees.

(j) Detainees shall be permitted to send confidential information or correspondence to the auditor.

(k) Auditors shall attempt to solicit input from community-based or victim advocates who may have insight into relevant conditions in the facility.

(l) All sensitive but unclassified information provided to auditors will include appropriate designations and limitations on further dissemination. Auditors will be required to follow all appropriate procedures for handling and safeguarding such information.

§ 115.202 Auditor qualifications.

(a) An audit shall be conducted by entities or individuals outside of the agency and outside of DHS that have relevant audit experience.

(b) All auditors shall be certified by the agency, in coordination with DHS. The agency, in coordination with DHS, shall develop and issue procedures regarding the certification process, which shall include training requirements.

(c) No audit may be conducted by an auditor who has received financial compensation from the agency being audited (except for compensation received for conducting other audits, or other consulting related to detention reform) within the three years prior to the agency’s retention of the auditor.

(d) The agency shall not employ, contract with, or otherwise financially compensate the auditor for three years subsequent to the agency’s retention of the auditor, with the exception of contracting for subsequent audits or other consulting related to detention reform.

§ 115.203 Audit contents and findings.

(a) Each audit shall include a certification by the auditor that no conflict of interest exists with respect to his or her ability to conduct an audit of the facility under review.

(b) Audit reports shall state whether facility policies and procedures comply with relevant standards.

(c) For each of these standards, the auditor shall determine whether the audited facility reaches one of the following findings: Exceeds Standard (substantially exceeds requirement of standard); Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period); Does Not Meet Standard (requires corrective action). The audit summary shall indicate, among other things, the number of provisions the facility has achieved at each grade level.

(d) Audit reports shall describe the methodology, sampling sizes, and basis for the auditor’s conclusions with regard to each standard provision for each audited facility, and shall include recommendations for any required corrective action.

(e) Auditors shall redact any personally identifiable detainee or staff information from their reports, but shall provide such information to the agency upon request.

(f) The agency shall ensure that the auditor’s final report is published on the agency’s Web site if it has one, or is otherwise made readily available to the public. The agency shall redact any sensitive but unclassified information.
(including law enforcement sensitive information) prior to providing such reports publicly.

§ 115.204 Audit corrective action plan.
(a) A finding of “Does Not Meet Standard” with one or more standards shall trigger a 180-day corrective action period.
(b) The agency and the facility shall develop a corrective action plan to achieve compliance.
(c) The auditor shall take necessary and appropriate steps to verify implementation of the corrective action plan, such as reviewing updated policies and procedures or re-inspecting portions of a facility.

(d) After the 180-day corrective action period ends, the auditor shall issue a final determination as to whether the facility has achieved compliance with those standards requiring corrective action.

(e) If the facility does not achieve compliance with each standard, it may (at its discretion and cost) request a subsequent audit once it believes that is has achieved compliance.

§ 115.205 Audit appeals.
(a) A facility may lodge an appeal with the agency regarding any specific audit finding that it believes to be incorrect. Such appeal must be lodged within 90 days of the auditor’s final determination.

(b) If the agency determines that the facility has stated good cause for a re-evaluation, the facility may commission a re-audit by an auditor mutually agreed upon by the agency and the facility. The facility shall bear the costs of this re-audit.

(c) The findings of the re-audit shall be considered final.

Jeh Charles Johnson,
Secretary.

[FR Doc. 2014-04675 Filed 3-6-14; 8:45 am]

BILLING CODE 9110-98-P
Clay County, Krome and Torrance where the three facilities that failed their Nakamoto inspection but subsequently passed after their 180 re-inspections.
Cleared as edited. Defer to OPA.

**On Background (To be attributed to an ICE Official): (approved by FOD Acosta and CC Gastelo)**

ICE detainees in the Torrance County Detention Facility (TCDF) have access to legal counsel and telephonic resources and receive a legal rights group presentation, as mandated by ICE’s Performance Based National Detention Standards (PBNDS) 2011, rev. 2016. The Torrance County Detention Facility (TCDF) complies with the PBNDS. More information about the standards is available here: [PBNDS](#).

Oversight is provided by an on-site detention service manager employed by ICE Enforcement and Removal Operations (ERO) Oversight, Compliance and Acquisition Division, as well as the ICE Office of Detention Oversight, and the Department of Homeland Security (DHS) Office for Civil Rights and Civil Liberties, all of which have open access to ICE detention facilities.

ICE’s civil detention system aims to reduce transfers, maximize access to counsel and visitation, promote recreation, improve conditions of confinement and ensure quality medical, mental health and dental care.

Noncitizens processed for removal may receive their legal due process from federal immigration judges in the immigration courts, which are administered by the Executive Office of Immigration Review (EOIR). EOIR is an agency within the U.S. Department of Justice and is separate from the U.S. Department of Homeland Security and ICE. Immigration judges in these courts make decisions based on the merits of each individual case. ICE officers carry out the removal decisions made by the federal immigration judges.

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**From:** [ICE OPA ERO Issue Papers](mailto:ICE OPA ERO Issue Papers)@ice.dhs.gov

**Sent:** Wednesday, November 10, 2021 2:10 PM

**To:** [ICE OPA ERO Issue Papers](mailto:ICE OPA ERO Issue Papers)@ice.dhs.gov

**Subject:** OPA ISSUE: New York Times counsel query about Torrance detention facility

All:

**Deadline:** Soonest
ISSUE:

The New York Times (Eileen Sullivan), NBC (El Paso affiliate – Julian Resendiz) and New Mexico Political Reporter (Susan Dunlap) are looking into allegations by 45 detainees - all Haitian males – who claim they are being rushed through removal proceedings and not being allowed to speak with counsel at the Torrance (NM) County Detention Facility (TCDF).

Reporters is asking the following:

- Are detainees at Torrance being allowed to speak to attorneys?
- Are there any concerns that Torrance is not in compliance with the Performance Based National Detention Standards.
- How many Haitians are housed at TCDF? **81 as of Nov. 9**
- Are translation services available to the Haitian detainees? **Yes. That information may be found here.**

On Background (To be attributed to an ICE Official): (approved by FOD Acosta and CC Gastelo)

U.S. Immigration and Customs Enforcement’s (ICE) detention facilities, including contract facilities, are evaluated regularly under ICE’s Performance Based National Detention Standards (PBNDS) 2011, rev. 2016. The Torrance County Detention Facility (TCDF) complies with the PBNDS.

The health, welfare and safety of ICE detainees is among the highest priorities for the Enforcement and Removal Operations (ERO) El Paso field office.

Detainees have access to legal counsel, telephone, as well as to a legal rights group presentation. More information can be obtained in the PBNDS.

Oversight is provided by an on-site detention service manager employed by ICE Enforcement and Removal Operations (ERO) Oversight, Compliance and Acquisition Division, as well as the ICE Office of Detention Oversight, and the Department of Homeland Security (DHS) Office for Civil Rights and Civil Liberties, all of which have open access to ICE detention facilities.

Noncitizens processed for removal may receive their legal due process from federal immigration judges in the immigration courts, which are administered by the Executive Office of Immigration Review (EOIR). EOIR is an agency within the U.S. Department of Justice and is separate from the U.S. Department of Homeland Security and ICE. Immigration judges in these courts make decisions based on the merits of each individual case. ICE officers carry out the removal decisions made by the federal immigration judges.

ICE’s civil detention system aims to reduce transfers, maximize access to counsel and visitation, promote recreation, improve conditions of confinement and ensure quality medical, mental health and dental care.

Thanks!

[b](6)(b)(7)(C)
Public Affairs Officer/Spokeswoman
DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement (ICE)
El Paso, West Texas, New Mexico
(915) 857-0667 office
(915) 857-6083 fax
(915) 722-3000 mobile
@ice.dhs.gov

Follow ICE

From: @nytimes.com
Sent: Monday, November 8, 2021 11:21 AM
To: @ice.dhs.gov
Subject: Torrance County Detention Facility

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact ICE SOC SPAM with questions or concerns.

Hi,

Are inmates at Torrance being given access to counsel? I spoke with someone who said 45 of the current inmates - all Haitian men picked up around Del Rio - are currently in rushed removal proceedings and not being allowed to speak with counsel. There are also concerns that Torrance is not in compliance with the Performance Based National Detention Standards.
Can you please get back to me about why this is happening?

Thanks!
Best,

Washington Bureau
(c) 202-997
(WhatsApp, Signal)
October 5, 2021

Secretary Alejandro Mayorkas  
U.S. Department of Homeland Security  
500 12th St. SW Washington, D.C. 20536

Acting Director Tae D. Johnson  
U.S. Immigration and Customs Enforcement  
500 12th St. SW Washington, D.C. 20536

Re: The Critical Need for a Functioning Universal System of Discretionary Release from ICE Detention

Dear Secretary Mayorkas and Acting Director Johnson:

The American Immigration Council and the American Immigration Lawyers Association (AILA), through our joint initiative the Immigration Justice Campaign, write to follow up on our March 25, 2021, letter regarding the need for the Department of Homeland Security (DHS) to establish a functioning universal system of receipt and adjudication of discretionary requests for release from U.S. Immigration and Customs Enforcement (ICE) custody. Our previous letter described the significant barriers to release attorneys have reported to us. Since then, attorneys have continued to report similar barriers without improvement.

Importance of a Functioning System of Release from Detention

ICE detention has been shown to cause significant barriers to access to counsel, as well as severe physical and mental harm. It is therefore crucial that people in ICE custody have an opportunity for release whenever possible. The only proven solution to these harms of detention is release, with the provision of community-based support services as needed.

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Continued Due Process Failures and Fundamental Unfairness in Current System

We believe that recent litigation\(^4\) supports the need for the administration to standardize release protocols across ICE field offices and re-affirm that a functioning system of release—both from ICE custody and from CBP processing—is in the interest of both the U.S. government and people seeking protection in our immigration court system.

Continued Due Process Failures and Fundamental Unfairness in Current System

As we raised in March, ICE’s current system of discretionary release is replete with due process failures that lead to the unnecessary detention of individuals. The system is fundamentally unfair because it is arbitrary and lacks clear and consistently applied guidelines on eligibility for release. The following are a few of the many barriers that detained individuals and their attorneys continue to face in requesting release.

1. ICE frequently does not make individualized custody determinations when reviewing custody determinations under Acting Director Tae Johnson’s February 18, 2021, memo *Interim Guidance: Civil Immigration Enforcement and Removal Priorities* (“Enforcement Priorities Memo”).\(^5\) For example, the Denver Field Office has repeatedly responded to release requests with boilerplate denials almost identical to the following: “In consideration of this request your supporting evidence, your client’s administrative file, medical records, criminal history, and previous release denials were reviewed. After consultation with management, Immigration and Customs Enforcement has determined a favorable exercise of discretion is not warranted in this case at this time.”\(^6\) In some cases, ICE’s denials of release requests incorrectly state the name of the detained individual or state the date of custody review as before the date the individual arrived in the United States. In at least one case, the San Antonio Field Office stated by phone only that a request had been denied based on “higher orders”, with no written response.

2. Consistent with the failure to make individualized custody determination, in all of the field offices in which we work,\(^7\) ICE frequently issues boilerplate denials of requests for release from individuals who are eligible for one or more forms of release and who have clearly demonstrated that they are not a flight risk or danger to the community. One attorney’s client was detained for over a year, despite being diagnosed with at least four different COVID risk factors. Her U.S. citizen minor child also has serious conditions. This woman’s criminal history does not include an aggravated felony and is the direct result of the severe human trafficking she has suffered, but

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\(^4\) Texas v. Biden, No. 21-10806 (5th Cir. 2021)


\(^6\) See Exhibit D.

\(^7\) The Immigration Justice Campaign recruits, trains, and mentors pro bono attorneys for the purpose of representing individuals detained in ICE facilities across the United States. We currently place cases in the Atlanta, Denver, El Paso, New Orleans, San Antonio, and San Diego field offices.
she was denied release at least three times by the local field office and once through the ICE Case Review process." The Denver Field Office denied a request that an attorney made for her client to be released, even temporarily, to attend his son’s funeral. The New Orleans Field Office denied release for a young man who had recently turned 18, had no criminal history, was grieving the deaths of his father and his aunt who served as his caregiver, and was at risk of losing eligibility for Special Immigrant Juvenile classification if he remained detained. The denial was later affirmed through the ICE case review process.

3. Similarly, ICE frequently does not provide “justification for continued detention” pursuant to Fraihat v. ICE, as required by court order. The Denver Field Office has stated by phone that denial of release pursuant to Fraihat v. ICE does not require an individualized explanation. ICE also frequently does not follow the court order’s instructions that “[d]efendants shall ensure that the presence of a Risk Factor is given significant weight and that the custody reviews are meaningful.” For example, the Denver Field Office has denied release to multiple people who it admits are Fraihat class members solely because of their criminal history. The Atlanta Field Office informed multiple individuals that they would be released under Fraihat v. ICE but later told them that ICE Headquarters had reserved the decision and that they would remain detained.

4. In all of the field offices in which we work, attorneys report that detained individuals who submit a request for release often wait weeks or months for a response, or do not receive one at all. This failure to adjudicate requests often amounts to a de facto denial with no justification, because the individual continues to be detained without knowing why. One attorney submitted 25 requests for release to the El Paso Field Office, and only through very intensive follow up eventually received three responses. The El Paso Field Office has stated over the phone to an attorney that it is too difficult for the agency to have to communicate with attorneys about all decisions. Without seeing release denials with individualized justifications, attorneys cannot understand the field office’s release eligibility requirements. They therefore cannot assess whether clients may be eligible for release or what evidence they need to provide to be eligible. Instead, attorneys must blindly submit release requests for all of their detained clients, including those that are unlikely to be granted, wasting time for both the attorney and ICE.

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8 See Exhibit A.
9 See Exhibit B.
10 See Exhibit C.
13 See Exhibits E and F.
5. National guidelines for, and oversight of, release determinations are inadequate, leading individual field offices to follow their own arbitrary rules in making these determinations such as the following:

**Atlanta Field Office**

- ICE states it can only release a certain number of people per day, resulting in people being detained for weeks after their initial release approval with no communication regarding their exact release date.
- ICE releases people in roughly alphabetical order over periods of weeks rather than releasing them all at the same time.

**Denver Field Office**

- ICE states it does not have jurisdiction to release people who entered without inspection.
- ICE states that "credible fear parole" and "humanitarian parole" are two separate types of parole and require the submission of two separate requests.
- ICE only releases individuals under *Fraihat v. ICE* if facility medical staff have affirmatively flagged that individual as eligible.
- ICE states that a sponsor’s lease agreement must include the name of the detained individual.\(^{14}\)

**El Paso Field Office**

- ICE states that it does not have jurisdiction to release people who entered without inspection.\(^{15}\)
- ICE states that it does not have officers on-site at some facilities,\(^{16}\) so the agency cannot obtain the sponsor information necessary to release individuals from whose records that information is missing and cannot evaluate whether someone is a *Fraihat v. ICE* class member if facility medical staff have not affirmatively flagged them as such.\(^{17}\)
- ICE states that it cannot release people with prima facie eligibility for Temporary Protected Status (TPS) because ICE Headquarters has not issued the necessary guidance.
- ICE states that it is too difficult for the agency to have to communicate with attorneys about all decisions regarding their clients’ cases.

**New Orleans Field Office**

- ICE states that it cannot release people unless they have an identification document, even in cases of an affidavit of identity submitted by a family member.

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\(^{14}\) See Exhibit G.

\(^{15}\) See Exhibit H.

\(^{16}\) See Exhibit I.

\(^{17}\) See Exhibit J.
• Some ICE officers tell detained individuals that their sponsors should not purchase plane or bus tickets prior to release, while other officers tell the sponsors of these same people that they are required to provide a confirmation number for the tickets in order for the person to be released.

San Antonio Field Office
• ICE states that it does not have jurisdiction to release people who entered without inspection.

San Diego Field Office
• ICE states that institutional sponsors, such as shelters, must submit financial documents for the release to be granted.
• ICE states that people with prima facie eligibility for TPS are not eligible for release if they have a final order of removal, even if the order is stayed.

Guidance on Discretionary Release from Custody Must Be Included in DHS’ Upcoming Enforcement Policy Recommendations

On January 20, 2021, Acting Secretary of Homeland Security Davis Pekoske directed DHS to complete within 100 days a department-wide review and develop “recommendations to address aspects of immigration enforcement”. Although more than 200 days have passed, these recommendations have not been issued. Until ICE detention can be phased out and support services as well as universal publicly-funded legal representation, we continue to ask DHS to immediately create a functioning system of discretionary release. Such a system should include:

• Clear, nationally consistent guidance on release eligibility including the criteria for demonstrating danger to the community or flight risk, whether the government or the detained individuals sustains the burden of proof, a presumption of release for all detained individuals, and individualized justifications for release denials;

• A procedure for requesting release that is accessible to all detained individuals, regardless of disability, native language, literacy, or whether they have legal representation, and that requires the agency to communicate a decision on the request to the detained individual and their counsel;

---

• Training on release eligibility and procedure for all ICE officers involved in release decisions, with training materials that are publicly available; and

• Oversight at the national level of the consistent application of all guidance across detention centers and field offices.

Sincerely,

American Immigration Council

American Immigration Lawyers Association

CC: Angela Kelley, Senior Counselor, U.S. Department of Homeland Security

Timothy Perry, Chief of Staff, U.S. Department of Homeland Security
EXHIBIT A
Good afternoon.

On May 13, 2021, you contacted U.S. Immigration and Customs Enforcement (ICE) via the Enforcement and Removal Operations (ERO) Office of the ERO Senior Reviewing Official mailbox to request a case review for [REDACTED]. Based upon ERO’s consideration of your inquiry, including any supplemental information provided, the prior decision of the ERO field office handling this case will remain in place.

Please note that there is no appeal of the agency’s decision whether or not to exercise discretion in an individual non-citizen’s case. If you have additional questions or concerns, please contact your local field office. A list of ERO field offices and their contact information is available here: http://www.ice.gov/contact/ero.

Senior Reviewing Official

From: [REDACTED]@immcouncil.org>
Sent: Thursday, May 13, 2021 1:06 PM
To: ICECaseReview <ICECaseReview@ice.dhs.gov>
Cc: [REDACTED]@immcouncil.org; [REDACTED]@rmian.org; [REDACTED]
Subject: Case Review for [REDACTED]

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact ICE SOC SPAM with questions or concerns.

To Whom It May Concern,

We are raising the case of [REDACTED], through the ICE Case Review process because she is not an enforcement priority pursuant to the ICE Interim Guidance on Enforcement and Removal Priorities issued February 18, 2021, by Acting Director Johnson. Her pro bono attorneys, cc’ed, have requested Ms. [REDACTED]’s release at the local level at the field office level but ICE decided to continue detention.

Ms. [REDACTED]’s only criminal history is a direct result of the severe human trafficking she suffered at the hands of her legal husband. She yielded to her trafficker’s example in interacting with his children. He often demanded that she hit his children to punish them. If she refused, he would hurt them. She tried to leave him but returned because she felt obligated to protect his children. She is incredibly remorseful for the harm the children experienced and believes her trafficker reported her to prevent her from reporting him to authorities in the United States.
Attached is a case summary, G-28, and the latest denial of Ms. [redacted]'s request for release. Please let me know if you would like more information. Thank you for your attention to this issue.

Sincerely,

[signature]
Advocacy Manager, Immigration Justice Campaign
Pronouns: She/Her
San Antonio, Texas
202-207-2071
immmcouncil.org

American Immigration Council
www.AmericanImmigrationCouncil.org
Blog: www.immigrationimpact.com
Justice Campaign: www.immigrationjustice.us
EXHIBIT B
Good afternoon.

On May 27, 2021, you contacted U.S. Immigration and Customs Enforcement (ICE) via the Enforcement and Removal Operations (ERO) Office of the ERO Senior Reviewing Official mailbox to request a case review for [REDACTED]. Based upon ERO’s consideration of your inquiry, including any supplemental information provided, the prior decision of the ERO field office handling this case will remain in place.

Please note that there is no appeal of the agency’s decision whether or not to exercise discretion in an individual non-citizen’s case. If you have additional questions or concerns, please contact your local field office. A list of ERO field offices and their contact information is available here: http://www.ice.gov/contact/ero.

Senior Reviewing Official

To Whom It May Concern,

We are urgently raising the case of [REDACTED] for case review. His son died on approximately May 8, 2021, by a murder that is related to [REDACTED] claim for protection. He hopes to be able to attend his son’s funeral this Saturday, May 29 at 7:30 a.m. and emotionally support his family, including his adult children and minor child, while they are grieving.

[REDACTED] is not an enforcement priority pursuant to the ICE Interim Guidance on Enforcement and Removal Priorities issued February 18, 2021, by Acting Director Johnson. The priorities are limited to three categories of people: (1) individuals who pose a danger to national security, (2) individuals apprehended at the border on or after November 1, 2020, and (3) individuals who pose a threat to public safety and have been convicted of an aggravated felony, have been convicted or an offense for which an element was active participation in a criminal street gang, or who intentionally participated in an organized criminal gang or transnational criminal organization to
further the illegal activity of the gang or transnational criminal organization.

[Redacted] does not fit within any of these categories. He has no aggravated felony convictions. [Redacted]’s only convictions were in 2002, when he was sentenced to two days in jail for a misdemeanor, and in 2008, when he was sentenced to five days in jail misdemeanor. His other charges are traffic violations over 11 years old.

Our pro-bono attorney has requested [Redacted] release at the local level and asked for case review at the field office level, but both requests have been denied. ICE stated that he had been deemed an enforcement priority on March 8, 2020, without explanation of why. Given the current circumstances of [Redacted] son’s death and that over eleven weeks have passed, we believe his case merits a new review.

Attached is a case summary, G-28, criminal history, and the denial of [Redacted] request for release. Please let me know if you would like more information. We thank you for your attention to this issue.

Sincerely,

[Redacted]

Advocacy Manager, Immigration Justice Campaign
Pronouns: She/Her
San Antonio, Texas
202-507-6296
@immcouncil.org

American Immigration Council
www.AmericanImmigrationCouncil.org
Blog: www.immigrationimpact.com
Justice Campaign: www.immigrationjustice.us
Attached is a copy of your clients parole review. Thank you.

Deportation Officer, Detained Unit
New Orleans Field Office
Enforcement and Removal Operations
Immigration and Customs Enforcement
08/11/2021

26362 Hwy 115
Ferriday, LA 71334

In Reference to: A #

NOTIFICATION DECLINING TO GRANT PAROLE

Dear:

This letter is to inform you that U.S. Immigration and Customs Enforcement (ICE) has decided not to parole you from detention at this time. Under ICE policy, arriving aliens determined by an Asylum Officer to have a credible fear of persecution or torture are initially considered for parole. While the decision whether to grant parole is discretionary, ICE policy is generally to grant parole to aliens determined to have a credible fear if they establish their identity and that they pose neither a flight risk nor danger to the community.

As part of its determination whether to parole you, on _______10/03/2019______, ICE conducted an initial interview with you. Your immigration files and any supplemental documentation that you provided were reviewed at that time. After reviewing all available information, ICE has determined that parole is not appropriate in your case at this time based on the following reason(s):

☐ You have not established your identity to the satisfaction of ICE.
   ☐ You did not present valid, government-issued documentation of identity, or any documents you submitted did not, to ICE’s satisfaction, establish your identity.
   ☐ You did not provide third-party verification of your identity, or any third-party information you provided did not, to ICE’s satisfaction, establish your identity.
   ☐ You did not, to ICE’s satisfaction, establish your identity through credible statements.

☒ You have not established to ICE’s satisfaction that you are not a flight risk.
   ☐ You failed to provide, to ICE’s satisfaction, a valid U.S. address where you will reside while your immigration case is pending.
   ☒ You did not establish, to ICE’s satisfaction, substantial ties to the community.
   ☒ Imposition of a bond or other conditions of parole would not ensure, to ICE’s satisfaction, your appearance at required immigration hearings pending the outcome of your case.
Good morning,

Our client is an 18-year-old, who very recently was just a minor child, and who is being effectively prevented from pursuing Special Immigrant Juvenile Status (for which he is squarely and prima facie eligible) by the New Orleans ICE Field Office’s decision to (1) continue his cruel, soon-to-be prolonged detention; and (2) by failing to refer his negative credible fear determination for review by EOIR for over two months now. This is unacceptable, particularly considering the ICE memo issued just last week stating:

“Applicants for and beneficiaries of victim-based immigration benefits. When a noncitizen has a pending or approved application or petition for a victim-based immigration benefit, absent exceptional circumstances, ICE will exercise discretion to defer decisions on civil immigration enforcement action against the applicant or petitioner (primary and derivative) until USCIS makes a final determination on the pending victim based immigration benefit application(s) or petition(s), including adjustment of status for noncitizens with approved Special Immigrant Juvenile
status, or, in the case of a T visa, U visa, or VAWA application, until USCIS makes a negative bona fide or prima facie determination.” See Section 2.1 of the memo, available here.

In this case, __is not even able to pursue SIJS from within the confines of the River Correctional Center, as the first step would be his mother filing for his guardianship before the local family court. Our client, a kind youth with no criminal history and no prior immigration history, should absolutely not be considered an enforcement priority for this administration. We urge you to reconsider your decision to affirm the local field office’s needless, baseless, and cruel continuation of his detention which is keeping him in constant mental stress while separated from his mother and siblings after (1) recently learning that his father was murdered in Brazil and (2) grieving the death of his prior guardian—namely his aunt who died after a painful and protracted battle with cancer.

Thank you in advance for your consideration and exercise of discretion in this case.

Respectfully,

[Redacted]

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From: ICECaseReview <ICECaseReview@ice.dhs.gov>
Sent: Monday, August 16, 2021 9:40 PM
To: [Redacted] ICECaseReview <ICECaseReview@ice.dhs.gov>
Cc: [Redacted]
Subject: RE: Request for Review of Denial to Grant Parole - [Redacted] (A# [Redacted])

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good evening Ms. [Redacted].

On August 16, 2021, you contacted U.S. Immigration and Customs Enforcement (ICE) via the Enforcement and Removal Operations (ERO) Office of the ERO Senior Reviewing Official mailbox to request a case review for [Redacted]. Based upon ERO’s consideration of your inquiry, including any supplemental information provided, the prior decision of the ERO field office handling this case will remain in place.

Please note that there is no appeal of the agency’s decision whether or not to exercise discretion in an individual alien’s case. If you have additional questions or concerns, please contact your local field office. A list of ERO field offices and their contact information is available here: http://www.ice.gov/contact/ero.

Thank you for contacting ICE.

Senior Reviewing Official
Dear Supervisory ICE Officials,

I am writing to escalate the Notification Declining to Grant Parole for our client Mr. [Name] (A# [Number]) for further ICE Case Review.

Our team received the attached Notification from DQ[001](8), [007](9), [010](10) on Friday 8/13/21, a full four weeks after our initial submission of the Release Request, also attached.

For the following reasons, we request ICE Case Review to reconsider this Declination:

- The Notification incorrectly states "On 10/03/2019, ICE conducted an initial interview with Mr. [Name]."
  - Mr. [Name] did not enter the U.S. until April 2021, and his Credible Fear Interview was not held until July 3, 2021. The incorrect date on this Notification supports our position that the local field office did not conduct an individualized review of this Release Request and their decision to decline parole was arbitrarily made.

- The Notification states that Mr. [Name] has "not established to ICE’s satisfaction that [he is] not a flight risk."
  - As a vulnerable 18-year-old who is prima facie eligible for Special Immigrant Juvenile Status (and as an asylum seeker currently requesting a review hearing before EOIR of the negative credible fear finding), Mr. [Name], who has no family or community remaining in Brazil, has no reason, personal or otherwise, to return to Brazil or to leave the U.S. He has no prior criminal history in the U.S. nor Brazil. For these reasons, it is obvious he is not a flight risk.

- The Notification states that he "did not establish, to ICE’s satisfaction, substantial ties to the community."
  - Mr. [Name] has two close family members here in the U.S., both of whom are named and described in the attached original Release Request and both of whom provided signed letters of support with copies of corroborating documentation.
  - One substantial tie is his Mother, who is pursuing Lawful Permanent Residence based out of [Address], where she lives with Mr. [Name]'s brothers, and where she will house and financially support him.
  - The other substantial tie is his Uncle, a longtime U.S. Citizen, who is his sponsor alongside his Mother, and who lives close by to the family.

- Further, the Notification states that "imposition of a bond or other conditions of parole would not ensure, to ICE’s satisfaction, [his] appearance at required immigration hearings pending the outcome of [his] case."
  - Given Mr. [Name]'s significant community ties, including his long-standing USC Uncle and sponsor and his mother, both of whom have gone through immigration processes and attended numerous hearings of their own and both of whom understand the importance of appearance at each and every hearing, it is evident that he has full support and every incentive to attend his future immigration hearings and post-release appointments.

For the above reasons, it is our well-documented position that the instant determination declining to grant parole for Mr. [Name] is arbitrary and capricious. It is evident that the local field office did not conduct an individualized review, nor do we believe that the contents and substance of the request were reviewed to any significant extent in making said determination.
We ask that ICE Case Review Officials review this matter as soon as possible, so that Mr. [redacted] can be reunited with his mother, uncle, and brothers and so that he can pursue SIJS status outside of the traumatizing carceral setting not suited for a non-violent youth, and so that he may enroll in his Senior Year of high school to complete his studies.

Respectfully,

[redacted]

This e-mail and any attachments are confidential and may be protected by legal privilege. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of this e-mail or any attachment is prohibited. If you have received this e-mail in error, please notify [redacted] immediately by returning it to the sender and delete this copy from your system. Thank you for your cooperation.
EXHIBIT D
April 7, 2021

Attorney [REDACTED]

Re: Request for Custody Redetermination for [REDACTED]

Dear Attorney [REDACTED],

This letter is in response to the custody redetermination request you submitted for your client, [REDACTED], based on your opinion he is not a priority for enforcement as indicated in the ICE Interim Guidance on Enforcement and Removal Priorities issued February 18, 2021 by Acting Director Johnson. In consideration of this request your supporting evidence, your client’s administrative file, medical records, criminal history, and previous release denials were reviewed.

After consultation with management, Immigration and Customs Enforcement has determined a favorable exercise of discretion is not warranted in this case at this time. Your request for released based on the ICE Interim Guidance on Enforcement and Removal Priorities is denied.

Sincerely,

[Signature]

Assistant Officer in Charge

[Signature]
EXHIBIT E
NOTICE OF CUSTODY DETERMINATION
(Continuation)

Pursuant to a review conducted to comply with requirements in Fraihat v. ICE, --- F. Supp. 3d ---, 2020 WL 1932570 (C.D. Cal. Apr. 20, 2020), you have been identified as having one or more of the Risk Factors identified by the district court as placing you “at heightened risk of severe illness and death upon contracting the COVID-19 virus.”

The Risk Factor(s) in your case are that you:

☑ Are Pregnant
☑ Have a Chronic Care Condition (As confirmed by a medical professional)
  Condition: Major Depressive Disorder, Anxiety Disorder, Amphetamine/Substance Abuse Disorder

Upon review of the totality of the circumstances present in your case, it has been determined that you will:

☑ Remain detained, and the following justification forms the basis for your continued detention: Select ONE
  Threat to Public Safety

Comments: Subject has an aggravated felony conviction for Attempted Second Degree Murder with sentencing enhancements for using a firearm and inflicting GBI. Attorney verifies previous gang membership in El Salvador.

Signature

Title
Assistant Officer in Charge
EXHIBIT F
NOTICE OF CUSTODY DETERMINATION
(Continuation)

Pursuant to a review conducted to comply with requirements in Fraihat v. ICE, --- F. Supp. 3d ---, 2020 WL 1932570 (C.D. Cal. Apr. 20, 2020), you have been identified as having one or more of the Risk Factors identified by the district court as placing you "at heightened risk of severe illness and death upon contracting the COVID-19 virus."

The Risk Factor(s) in your case are that you:

☐ Are age 55 or over
☐ Are Pregnant
☑ Have a Chronic Care Condition (As confirmed by a medical professional)
   Condition: Major Depressive Disorder, Anxiety, Hypothyroidism, Gender Dysphoria, BMI

Upon review of the totality of the circumstances present in your case, it has been determined that you will:

☐ Be released from custody.
☑ Remain detained, and the following justification forms the basis for your continued detention: Select ONE

Threat to Public Safety

Comments: Aggravated felony conviction for Lewd or Lascivious Acts with a Child. Sentenced to eight years in California DOC.

Signature

Title
Assistant Officer in Charge
EXHIBIT G
Good Morning,

In regards to the Credible Fear Parole request submitted for [redacted], there are a few documents that will need to be submitted before a decision can be made.

An amended lease agreement will need to be provided as the lease agreement provided does not list Ms. [redacted] as an authorized occupant of the residence. Current utility bill statements, water, power, gas for that residence will need to be submitted as well. Those items can be mailed directly to Officer [redacted] at GEO. If emailing the documents, please ensure legible color copies are provided.

Please advise if you have any questions,

Best Regards,

[redacted]

Deportation Officer

Denver Contract Detention Facility, Detained Docket Unit

Enforcement and Removal Operations

U.S. Immigration and Customs Enforcement

3130 N Oakland St, Aurora, CO 80010  Office: 303-361- [redacted]
EXHIBIT H
To: [Redacted]  
Cc: [Redacted]  

Good afternoon,

I received the Fraihat list from Torrance facility and your client was not on the list. He also does not qualify for parole because he is an EWI. As of right now, there is NO present urgent humanitarian reason or significant public benefit for release.

You can request medical records from Torrance Medical Staff. Your client's case has been referred to the Houston Asylum and is pending CF interview.

Respectfully,

[Redacted]  
Deportation Officer  
El Paso Field Office/Otero County Processing Center  
Enforcement and Removal Operations  
U.S. Immigration and Customs Enforcement  
O: (915) 834- [Redacted]  
G: (915) 243- [Redacted]
EXHIBIT I
Fraihat class members at Torrance

Wed, May 26, 2021 at 2:01 PM

Good Afternoon,

We're currently working on vetting all the cases at Torrance which may potentially be FRAIHAT class members. As an FYI, cases detained at Torrance are managed by Otero. Anything having to do with their cases, the immigration/legal aspect will be managed by Otero. If you wish to speak to your client(s), please reach out to SDDC @ice.dhs.gov to coordinate that call with the facility.

Information pertaining to case

OTERO-LegalAccess OTERO-LegalAccess@ice.dhs.gov

Phone call/communication with client

SDDC @ice.dhs.gov

Thanks,

Supervisory Detention and Deportation Officer
El Paso Field Office
Otero County Processing Center

Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
Office: (915) 834-9600.
EXHIBIT J
Good afternoon,

A medical professional evaluated your client to determine whether your client falls within the populations identified by the CDC as potentially being at higher risk for serious illness from COVID-19 and/or the subclasses certified in Fraihat v. ICE. The results of this evaluation concluded that your client's condition does not fall within the vulnerabilities listed by the CDC. ERO will not conduct a custody redetermination under Fraihat v. ICE in this case.

Respectfully,

Deportation Officer/Asylum Unit  
El Paso Field Office/Otero County Processing Center  
Enforcement and Removal Operations  
U.S. Immigration and Customs Enforcement  
Desk: 915-834-  
Cell: 915-892-  

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From: @usdoj.gov
Sent: Tuesday, November 30, 2021 11:22 AM
To: @ice.dhs.gov; @ice.dhs.gov; @usdoj.gov
Cc: @ice.dhs.gov; @usdoj.gov; Padilla, Kenneth

Subject: RE: Fraihat: Special Master Hearing Update and Followups

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Thanks. There isn’t much happening in the case right now, so we should be able to minimize our random requests and let focus on review.
From: [Redacted]@ice.dhs.gov
Sent: November 29, 2021 4:23 PM
To: [Redacted]@usdoj.gov, [Redacted]@ice.dhs.gov, [Redacted]@ice.dhs.gov,
Cc: [Redacted]@usdoj.gov, [Redacted]@ice.dhs.gov

Subject: [EXTERNAL] RE: Fraihat: Special Master Hearing Update and Followups

Thank you [Redacted]. These are going slower per the instruction that they needed to be handled by people familiar with the case — that’s [Redacted] and, given the nature of this case, review has to be prioritized below the other asks and required reporting. They were also both on leave last week. They are working to finish before the holidays but, as always, the ability to do so may be dependent upon how many random asks come our way over the next two weeks.
Thanks,

From: [usdoj.gov]
Sent: Monday, November 29, 2021 3:10 PM
To: [ice.dhs.gov]
CC: [usdoj.gov]

Subject: RE: Fraihat: Special Master Hearing Update and Followups

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Hope you all had a nice Thanksgiving. Updated CORA numbers show we are nearing the end
From: [Redacted]
Sent: November 10, 2021 5:10 PM
To: [Redacted]
Cc: [Redacted]
Subject: RE: Faihat: Special Master Hearing Update and Followups

[Redacted]

Update on Faihat progress. I worked through the tech issues and was able to resolve some. Most of those left are password protected with no password to be found. There is no way to resolve those without retrieving the password from the original custodian. I don’t anticipate needing to take that step.

Do we have an estimate on the remaining docs? The first and third sets are understandably taking the longest, but we should try to give opposing counsel some sense of our timeline.

Best,
[Redacted]

[Redacted]
From: [b](b)(6); (b)(7)(C)
Sent: October 29, 2021 11:05 AM
To: [b](b)(6); (b)(7)(C)
Cc: [b](b)(6); (b)(7)(C)

Subject: RE: Fraihat: Special Master Hearing Update and Followups

Good morning [b](b)(6); Updated numbers here. Per [b](b)(8); email below, I will start looking at the tech [b](b)(5)
Best,

[b](6) [b](7)

From: [b](6) [b](7) @ice.dhs.gov
Sent: October 19, 2021 4:56 PM
Subject: [EXTERNAL] RE: Fraihat: Special Master Hearing Update and Followups

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-4085

--- ATTORNEY/CLIENT PRIVILEGE --- ATTORNEY WORK PRODUCT ---

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From: [b](8); [b](7)[(C)]
Sent: Tuesday, October 19, 2021 4:35 PM
To: [b](6); [b](7)[(C)]
Cc: [b](6); [b](7)[(C)]

[b]@ice.dhs.gov>
Subject: RE: Fraihat: Special Master Hearing Update and Followups

Thank (b)[to] is trying to take a look at number 3 but, unfortunately, per the request to have an SME work on those, she would be the only one who can. I had to assign her to a different high priority document review project right now. In addition to that, the settlement issues in this and other cases are taking precedence so that last group may still take a little time. That said, we do have available to assist this week with #3 (and she will be back with us full time in November) and she and are going to try to work through as much of this as they can.

From: (b)[to]@usdoj.gov

Sent: Tuesday, October 19, 2021 4:21 PM

To: (b)[to]@ice.dhs.gov; (b)[to]@usdoj.gov

Cc: (b)[to]@ice.dhs.gov; (b)[to]@usdoj.gov

Subject: RE: Fraihat: Special Master Hearing Update and Followups

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Best,

(b)[to]
From: (b)(6), (b)(7)(C)
Sent: October 6, 2021 10:30 AM
To: (b)(6), (b)(7)(C)
Cc: (b)(6), (b)(7)(C)

Subject: RE: Fraihat: Special Master Hearing Update and Followups

Good morning (b)(6). The lab let me know last night that there was a large conversion project drawing resources from CORA and slowing everything else down. Hopefully we don’t see it again today.
(b)(5)
Best,

[Redacted]

From: [Redacted]
Sent: October 1, 2021 9:24 AM

Cc: [Redacted]
Subject: [EXTERNAL] RE: Frihat: Special Master Hearing Update and Followups

Thank you will handle #3 below on Tuesday and will therefore be unavailable on Tuesday for any other e-mails/inquiries/questions. If there’s anything that can’t wait an extra 24 hour will be covering.

From: @usdoj.gov

Sent: Thursday, September 30, 2021 1:37 PM

Subject: RE: Frihat: Special Master Hearing Update and Followups

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I am still struggling with the workspace, but I have some additional reviews ready to start. The
Thanks. Once you’ve talked to the lab, please let me know how many (total) have been produced and how many are remaining. Would like to try to ask people to work to ensure everything is completed by COB Wednesday just in case of shutdown.
We did submit a production request on Friday, so there will be about 4,400 docs going out today or tomorrow. Once I talk to the lab today, I’ll find out how many are left and we will go from there.

Best,

(b)(6)

From: [b](6); [b](7)(C)  
Sent: September 27, 2021 10:52 AM  
To: [b](6); [b](7)(C)  
Cc: [b](6); [b](7)(C)  

Subject: [b](6); [b](7)(C)  

@ice.dhs.gov; [b](6); [b](7)(C)

@ice.dhs.gov;

@ice.dhs.gov; [b](6); [b](7)(C)

@ice.dhs.gov; [b](6); [b](7)(C)

@ice.dhs.gov; [b](6); [b](7)(C)

@ice.dhs.gov; [b](6); [b](7)(C)

@ice.dhs.gov; [b](6); [b](7)(C)

@ice.dhs.gov;

@ice.dhs.gov; [b](6); [b](7)(C)

@ice.dhs.gov; [b](6); [b](7)(C)

@HQ.DHS.GOV; [b](6); [b](7)(C)

@ice.dhs.gov;

Padilla, Kenneth

[b](6); [b](7)(C)

[b](6); [b](7)(C)

[b](6); [b](7)(C)

@ice.dhs.gov; [b](6); [b](7)(C)

[b](6); [b](7)(C)

[b](6); [b](7)(C)
Subject: RE: Fraihat: Special Master Hearing Update and Followups

Best,

From: @ice.dhs.gov
Sent: September 24, 2021 12:47 PM
To: @ice.dhs.gov
Cc: @ice.dhs.gov

@usdoj.gov

@hq.dhs.gov; Padilla, Kenneth
Subject: RE: Fraihat: Special Master Hearing Update and Followups

Thank you,

From: @usdoj.gov>
Sent: Friday, September 24, 2021 12:15 PM
To: @ice.dhs.gov>
Cc: @ice.dhs.gov>

Subject: [EXTERNAL] RE: Fraihat: Special Master Hearing Update and Followups

My understanding is that there were no Active Learning second pass review responsive batches available anymore, so are those 1697 documents in batches that are currently checked out to reviewers? If so, can you tell me who they are? If not, how many batches are available for assignment? We had everyone on second line focusing on the active learning batches and only had folks move to second line on the exclusions once we were informed there were no more active learning batches available, so I'm trying to understand what is still outstanding and why.

Same question for first line. I thought all batches were done, so can you tell me where those remaining 60 documents came from? Are they assigned to someone or just need someone to be assigned?
Subject: RE: Fraiseh: Special Master Hearing Update and Followups

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Hello,

I am writing to provide an update on second line review. As we have discussed, the goal is to complete review by September 30th.

There are 1,697 remaining documents in 2nd pass review. These are the Active Learning documents that need to be completed by September 30th.

There are also 2,489 Active Learning Exclusions documents that need to be reviewed (60 remaining in 1st pass review and 2,429 remaining in 2nd pass review).

The priority is the 1,697 2nd pass review Active Learning documents, but the sooner ICE can complete the remaining 2,489 Active Learning Exclusions documents, the better.

Thank you,

From: [email address]
Sent: Wednesday, September 15, 2021 11:35 AM
Subject: RE: Fraihat: Special Master Hearing Update and Followups

Thank you.

Upon review, there are 2,291 remaining documents in 2nd pass review. These are the Active Learning documents that need to be completed by September 30th.

There are also 6,402 Active Learning Exclusions documents that need to be reviewed (60 remaining in 1st pass review and 6,342 remaining in 2nd pass review).

The priority is the 2,291 2nd pass review Active Learning documents, but the sooner ICE can complete the remaining 6,402 Active Learning Exclusions documents, the better.

Thank you,

From: [email]
Sent: Wednesday, September 15, 2021 9:34 AM
To: [email]
Cc: [email]

Subject: RE: Fraihat: Special Master Hearing Update and Followups

reported he finished those documents, so first-line should now be complete. Can you let us know how much second-line is remaining?

From: [email]
Sent: Monday, September 13, 2021 4:31 PM
To: [email]
Cc: [email]

2022-ICLI-00045 4288
Subject: RE: Fraiha: Special Master Hearing Update and Followups

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Just reassigned to [Redacted]

Thank you,
[Redacted]

From: [Redacted]
Sent: Monday, September 13, 2021 4:28 PM

Reassign to contractor [Redacted] and please confirm when done so I can let the contractor PM know.

From: [Redacted]
Sent: Monday, September 13, 2021 3:38 PM
Subject: RE: Fraihat: Special Master Hearing Update and Followups

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I apologize, I never received that email. I just pulled it up and it looks like there are still two batches that have not been completed for 1st Pass Active Learning Responsive. One batch is under (b) and one is under (b)(7)(C) attached a screenshot. I can reassign them, but would need to know who to reassign to.

Thank you,

From: (b)(8), (b)(7)(C) @ice.dhs.gov
Sent: Monday, September 13, 2021 3:13 PM
To: (b)(8), (b)(7)(C) @ice.dhs.gov
Cc: (b)(8), (b)(7)(C) @ice.dhs.gov; (b)(8), (b)(7)(C) @usdoj.gov

Subject: RE: Fraihat: Special Master Hearing Update and Followups

e-mailed on 9/2 to say that they had gone back in and checked in all documents that were under their names. Is there potentially an issue with CORA on those documents? Alternatively, is someone able to just check those documents back in so that someone else can review?
ICE,

Below is a consolidated email with outstanding asks. Is ICE available for a call tomorrow before 2:30pm to discuss how ICE is interpreting the transfer tracking portion of the PRR?

**Vaccine timeline**
Flagging our questions/concerns about letter distribution as a top priority.

**Meet and Confer Questions**
On 9/10 we sent an email with questions from our meet and confer with Plaintiffs. We request responses to those questions by COB Tuesday 9/14.

**Data anomaly issues**
- Can ICE please provide responses to the data anomaly questions that have been pending since at least 7/29? Per the data ICE is publishing on its website, there continues to be, on any given day, hundreds more cumulative cases in the past 10 days than cases in isolation/monitoring.

**Discovery**
There remains 112 docs that need first pass review. They are all assigned out, and one doc is complete. It may be that they have reviewed the docs but not tagged them as complete. A few even have a first pass review complete tag. We need to clear these docs with a first pass review tag this week please. We emailed about this on 8/18/21 and 9/1/21 but it appears these documents have still not been reviewed/completed.

**Privilege Logs**
There are two privilege logs that remain pending and need to be reviewed by ICE/DHS. Can ICE/DHS provide an update on those?

**Notice of Appeal**
We are still waiting for ICE’s official recommendation re appeal of the First Report & Recommendation. We note that the protective notice of appeal has been docketed and our opening brief on the vaccination requirement is due September 20 if no extension is sought and granted. We are working with opposing counsel to also refer that appeal (primarily of the vaccine requirement) to mediation in lieu of seeking continual extension of the briefing deadline there.

Thank you,
Subject: RE: Fraihat: Special Master Hearing Update and Followups

Responses below in yellow highlight. I hope that this is helpful. Please let us know if you have additional follow up.

Have a nice weekend.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-...

Subject: Re: Fraihat: Special Master Hearing Update and Followups

Thank you for the quick turnaround on this family will provide clarifications shortly.
Sent from my iPhone

On Sep 10, 2021, at 7:35 PM, [redacted]@ice.dhs.gov wrote:

We have received follow up questions for OIL in red for clarification, please see below. Thank you!

[redacted]
Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253---

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From: [redacted]@usdoj.gov
Sent: Friday, September 10, 2021 5:34 PM
Td: [redacted]@usdoj.gov <[redacted]>[redacted]@ice.dhs.gov;[redacted]@ice.dhs.gov;[redacted]@usdoj.gov;[redacted]@usdoj.gov
[redacted]@ice.dhs.gov;[redacted]@ice.dhs.gov
[redacted]@ice.dhs.gov;[redacted]@ice.dhs.gov;[redacted]@hq.dhs.gov;
[redacted]@sic.gov;[redacted]@sic.gov;[redacted]@sic.gov;[redacted]@sic.gov

Subject: RE: Fraihat: Special Master Hearing Update and Followups

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ICE,

(b)(6), (b)(7)(C)

Thank you,

(b)(6),
(b)(7)(C)

From:
(b)(6), (b)(7)(C) @usdoj.gov>

Sent: Friday, September 10, 2021 5:18 PM

To:
(b)(6), (b)(7)(C) @ice.dhs.gov>
(b)(6), (b)(7)(C) @usdoj.gov>

(b)(6), (b)(7)(C) @ice.dhs.gov>
(b)(6), (b)(7)(C) @usdoj.gov>
We’d like to get the vaccine timeline back to opposing counsel tonight, and would therefore flag our questions/concerns about Venters letter distribution as a top priority.

We also just completed our meet and confer with opposing counsel regarding transfers and will be following up with several follow-up questions for ICE.

Thanks.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-__

From: [Email Address]
Sent: Friday, September 10, 2021 4:00 PM
To: [Email Address]
CC: [Email Address]

Subject: RE: Fraihat: Special Master Hearing Update and Followups

We are working on these responses, but for your first question, we did confirm the response today pertained to non-IHSC facilities:
Can ICE provide a narrative of what generally happens during a medical screening (particularly as it relates to the COVID-19 vaccine education/scheduling) by Tuesday COB?

ICE response:

Kind regards,

[Redacted]

[Redacted]

Associate Legal Advisor  
U.S. Immigration and Customs Enforcement  
Office of the Principal Legal Advisor  
District Court Litigation Division  
500 12th Street SW  
Washington, D.C. 20536  
Mobile: (202) 253-

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From: [Redacted]  
Sent: Friday, September 10, 2021 3:51 PM  
To: [Redacted]  
Cc: [Redacted]  

Subject: RE: Faihat: Special Master Hearing Update and Followups

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Thank you,

(b)(5)

From: (b)(6), (b)(7)
Sent: Friday, September 10, 2021 3:04 PM
To: (b)(6), (b)(7)
Cc: (b)(6), (b)(7)
Subject: RE: Faihat: Special Master Hearing Update and Followups

Hi OIL,

Here are the additional responses to your questions, in red:
(b)(5)

ICE response

(b)(5)

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 25

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From: [b(6), (b)(7)(C)]
Sent: Thursday, September 9, 2021 5:25 PM
To: [b(6), (b)(7)(C)]
Cc: [b(6), (b)(7)(C)]
Subject: RE: Faihat: Special Master Hearing Update and Followups

Below please find ICE’s responses in red. Please note that there are a few questions where ICE is still working on the responses, highlighted in blue.

Emily

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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Subject: RE: Fraihat: Special Master Hearing Update and Followups

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Thank you below are follow up questions. We have a hearing with the Special Master on Friday at noon and meet and confer with Plaintiffs afterwards. We really need ICE’s responses by COB tomorrow so that we have time to follow-up before the hearing and meet and confer. Please let us know if we need to have a call to discuss further tomorrow.

b(5)
Thank you,

From: From: (b)(6); (b)(7)(C)
Sent: Tuesday, September 7, 2021 6:13 PM

To: (b)(6); (b)(7)(C)
Cc: (b)(6); (b)(7)(C)
Subject: RE: Fraihat: Special Master Hearing Update and Followups

Hi OIL,

(6); (b)(7)(C)
Kind regards,

(b)(5)

(b)(6), (b)(7)(C)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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From: @usdoj.gov>
Sent: Friday, September 3, 2021 2:42 PM
To: @ice.dhs.gov; @usdoj.gov; @ice.dhs.gov; @ice.dhs.gov;

---
Subject: RE: Fraihat: Special Master Hearing Update and Followups

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ICE,


Thank you,
Hi OIL:

Please see below for answers to the transfer questions from Plaintiffs, in red:

1. Whether anyone has been transferred into or out of facilities in anticipation of or in the aftermath of Hurricane Ida; No transfers into or out of facilities in anticipation of or in the aftermath of Hurricane Ida.

2. If so, what COVID precautions have been taken with respect to those people; and N/A.

3. Whether Hurricane Ida has impacted or will impact ICE’s compliance with its vaccination and other preliminary injunction obligations (for instance, due to supply chain or staffing disruptions) No.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 25  

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From @ice.dhs.gov>
Sent: Thursday, September 2, 2021 4:26 PM
To: @usdoj.gov; @ice.dhs.gov>
Cc: @usdoj.gov; @ice.dhs.gov>

Subject: RE: Fraiha: Special Master Hearing Update and Followups

Good afternoon,

Thank you for your response.

But, again, we are happy to talk further about this.

Thanks!

Associate Legal Advisor
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
Direct (202) 732-8068
Cell (202) 810-9441
Fax (202) 732-5346

<image001.png>

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From: usdoj.gov
Sent: Thursday, September 2, 2021 3:59 PM
Cc: usdoj.gov

Subject: RE: Fraihat: Special Master Hearing Update and Followups

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Best regards,

Senior Litigation Counsel
U.S. Department of Justice, Civil Division
Office of Immigration Litigation – District Court Section
P.O. Box 868 | Ben Franklin Station | Washington, DC 20044
Direct: (202) 532-3573 | Fax: (202) 305-7000 | Email: usdoj.gov

From: @ice.dhs.gov
To: usdoj.gov
Cc: usdoj.gov

Sent: September 2, 2021 1:53 PM

Subject: RE: Fraihat: Special Master Hearing Update and Followups

Please see below in highlight for a few questions or updates from ICE:

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Good Morning, ICE –

OIL is reaching out to follow up on the below items, which were most recently sent in an email from me on 8/25:
ICE concurs with OIL making edits to reflect ICE’s position:

ICE’s position is that vaccines will be offered (under a normal definition of the word) within 72 hours of intake and administered within 14 days, with some exceptional circumstances taking no more than 30 days to get a shot administered.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
From: @usdoj.gov
Sent: Wednesday, September 1, 2021 5:11 PM
To: @ice.dhs.gov, @ice.dhs.gov, @ice.dhs.gov, @ice.dhs.gov, @ice.dhs.gov, @ice.dhs.gov,
Cc: @usdoj.gov, @usdoj.gov, @hq.dhs.gov, Padilla, Kenneth
Subject: RE: Fraihat: Special Master Hearing Update and Followups

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ICE –

Please find attached Plaintiffs’ proposed language for the timeline of offering vaccines to newly-admitted Subclass Members. This proposed language is not in line with what was discussed during last week’s meet and confer and hearing before the Special Master. OIL would like to incorporate in its response ICE’s position that vaccines will be offered (under a normal definition of the word) within 72 hours of intake and administered within 14 days, with some exceptional circumstances taking no more than 30 days to get a shot administered.

Could ICE please confirm this position and send any other thoughts on this approach by COB tomorrow, Thursday, September 2nd, ahead of Friday’s hearing before the Special Master? Thank you.

Best Regards,

Trial Attorney
Great, thank you.

Thanks, ICE is working on the questions.
From: (b)(6), (b)(7)(C) @usdoj.gov

Sent: Tuesday, August 31, 2021 11:09 AM

To: (b)(6), (b)(7)(C) @ice.dhs.gov

Cc: (b)(6), (b)(7)(C) @usdoj.gov

Subject: RE: Fraihat: Special Master Hearing Update and Followups

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ICE,

I apologize – I got confused with when this email is due. Can you please send us your edits by 1pm?

Thank you,
From: ice.dhs.gov

Sent: Tuesday, August 31, 2021 10:42 AM

To: ice.dhs.gov

Cc: ice.dhs.gov; @usdoj.gov; ice.dhs.gov

Subject: RE: Fraihat: Special Master Hearing Update and Followups

ICE,

Below is a draft email to the Special Master. This is due this evening, so please send us edits by 3pm.

Thank you,

-----

Dear Judge Walsh and Counsel,
From: @ice.dhs.gov
Sent: Monday, August 30, 2021 6:17 PM
To: @usdoj.gov
Cc: @ice.dhs.gov

Subject: RE: Fraihat: Special Master Hearing Update and Followups

[b](5)
Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-0869

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From: [email]
Sent: Monday, August 30, 2021 11:29 AM
To: [email]@[usdoj.gov]
Cc: [email]@[ice.dhs.gov]; [email]@[ice.dhs.gov]; [email]@[ice.dhs.gov]; [email]@[ice.dhs.gov]; [email]@hq.dhs.gov; [email]@ice.dhs.gov; [email]@ice.dhs.gov; [email]@ice.dhs.gov
Subject: RE: Fraihat: Special Master Hearing Update and Followups

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Good morning ICE,

We are following up to make sure that we will receive answers to the below questions by COB today so that we can respond to the Special Master tomorrow. Could ICE give us an ETA on responses so that we can prepare accordingly?

Also, we are awaiting ICE’s update on mediation so that we can get back to opposing counsel. When can we expect to hear back from ICE regarding its position on mediation after our call on Friday?

Thank you,

(b)(5)

From: [Redacted]
Sent: Friday, August 27, 2021 2:57 PM
To: [Redacted]
Cc: [Redacted]

Subject: Friahat: Special Master Hearing Update and Followups

ICE,
Thank you,

(b)(6).

(b)(7)(C).

(c)(6); (b)(7)(C).

Trial Attorney
United States Department of Justice
Office of Immigration Litigation – District Court Section
P.O. Box 868 | Ben Franklin Station | Washington, D.C. 20044

2022-ICLI-00045 4326
FYI.

Best,
Ken Padilla
Deputy Principal Legal Advisor for Field Legal Operations
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
(202) 732-3250 (office)/(646) 789-8000 (mobile)

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From: Padilla, Kenneth
Sent: Tue, 29 Mar 2022 21:15:11 +0000
To: Davis, Mike P
Cc: LoIacono, Adam V
Hello Ken,

Please let me know if you have any questions. Take care,

Chief Counsel
Office of the Principal Legal Advisor, El Paso
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security

To register for eService, please go to https://eserviceregistration.ice.gov/

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***SENSITIVE/PRIVILEGED***PRE-DECISIONAL***ATTORNEY WORK PRODUCT***

From: Padilla, Kenneth
Sent: Tuesday, March 29, 2022 2:11 PM
To: [name]
Importance: High
Hello

Best,
Ken Padilla
Deputy Principal Legal Advisor for Field Legal Operations
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
(202) 732-3976 (office)/(646) 789-3123 (mobile)

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(b)(7).

From: Davis, Mike P   (b)(6); (b)(7)(C)   @ice.dhs.gov>
Sent: Tuesday, March 29, 2022 4:09 PM
To: Padilla, Kenneth (b)(6); (b)(7)(C)   @ice.dhs.gov>; Loiacono, Adam V (b)(6); (b)(7)(C)   @ice.dhs.gov>

From: Doyle, Kerry   (b)(6); (b)(7)(C)   @ice.dhs.gov>
Sent: Friday, February 18, 2022 3:16 PM
To: Davis, Mike P; Loiacono, Adam V


OK. Thanks. I’ll get back to you.

PRIVILEGED

Kerry E. Doyle
Principal Legal Advisor
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
Office: 202-732-...
Cell: 202-510-...

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From: Davis, Mike P
Sent: Friday, February 18, 2022 3:00 PM
To: Doyle, Kerry; Loiacono, Adam V

Thanks.

From: Doyle, Kerry
Sent: Friday, February 18, 2022 2:05 PM
To: Davis, Mike P; Loiacono, Adam V

Good idea. Thanks.

PRIVILEGED

Kerry E. Doyle
Principal Legal Advisor
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
Office: 202-732-...
Cell: 202-510-...

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From: Davis, Mike P  
Sent: Friday, February 18, 2022 2:04 PM  
To: Doyle, Kerry  
Loiacono, Adam  

Ken asked... 

From: Doyle, Kerry  
Sent: Friday, February 18, 2022 2:03 PM  
To: Davis, Mike P  
Loiacono, Adam  

Privileged

Kerry E. Doyle  
Principal Legal Advisor  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
U.S. Department of Homeland Security  
Office: 202-732-6000  
Cell: 202-511-0000  

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From: Davis, Mike P  
Sent: Friday, February 18, 2022 1:59 PM  
To: Doyle, Kerry  
Loiacono, Adam  
From: Doyle, Kerry
Sent: Friday, February 18, 2022 1:49 PM
To: Davis, Mike; Loiacono, Adam

PRIVILEGED

Kerry E. Doyle
Principal Legal Advisor
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
Office: 202-732-
Cell: 202-510-

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From: @usdoj.gov>
Sent: Tuesday, February 15, 2022 12:06 PM
To: @hq.dhs.gov>
Cc: @controldesk.ogcio@hhs.gov
Subject: Haitian Bridge Alliance, et al. v. Joseph R. Biden, et al., Civil Action No. 21-3317 (EGS)

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Dear Counsel:

On January 13, 2022, this office was served with a copy of the enclosed summons and complaint in the above-captioned case. This case has been assigned to Assistants United States Attorney and (copied to this email). Our Answer or dispositive motion is due on March 14, 2022.
Regards,

[Redacted] Paralegal Specialist
U.S. Attorney’s Office, Civil Division
(202) 252-5554 555 Fourth Street, N.W.
Washington, DC 20530
From: 
Sent: Thu, 31 Mar 2022 16:07:17 +0000
To: 
Cc: 
Subject: RE: [EXTERNAL] Fрайhat

I am writing to provide an update on this inquiry. We have reached out to ERO and are still awaiting a response. As soon as we hear back from ERO we will let you know. We expect to have a response by COB.

Thanks so much.

Sincerely,

[Redacted]
Associate Legal Advisor
Department of Homeland Security
Immigration and Customs Enforcement
Office of the Principal Legal Advisor—District Court Litigation Division
500 12th Street SW Mailstop 5900
Washington, D.C. 20536
Mobile Phone: (202) 607-7930

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Subject: RE: [EXTERNAL] Fraihat

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Please get us a response by noon on Thursday, or a heads up when you expect to send it.

Thank you,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-
Subject: RE: [EXTERNAL] Fraihat

Thank you. I’ve incorporated as best I can and send the attached final correspondence to opposing counsel.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-...
Subject: RE: [EXTERNAL] Fraihat

Please see ICE’s responses in red:

(b)(5)
Kind regards,

(b)(6); (b)(7)(C)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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From: (b)(6); (b)(7)(C)@usdoj.gov
Sent: Friday, March 25, 2022 4:56 PM
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(b)(6); (b)(6); (b)(6); (b)(6); (b)(6); (b)(6); @hq.dhs.gov

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<Fraihat Draft Responses to OIL re Plaintiffs Mediation Follow Ups 2.22.22 (002) (2 23 22 Updated ICE DHS Input).docx>
<Fraihat 2.24 Draft Email to Counsel.docx>
No. 20-55634

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

FAOUR ABDALLAH FRAIHAT ET AL.,

Plaintiffs-Appellees,

v.

U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT ET AL.,

Defendants-Appellants.

UNOPPOSED MOTION FOR A FINAL 30-DAY EXTENSION OF
TIME TO FILE A PETITION FOR REHEARING OR
REHEARING EN BANC

Pursuant to Federal Rules of Appellate Procedure 35 and 40 and
Circuit Rule 31-2.2(b), Plaintiffs respectfully move this Court for a final
30-day extension of time, from June 6, 2022, to and including July 6,
2022, to file a petition for rehearing or rehearing en banc. Defendants
do not oppose the requested extension. Declaration of Robert Loeb, ¶ 7.

1. On October 20, 2021, the panel majority in the above-captioned
matter filed a 70-page opinion, and Judge Berzon filed a 32-page
dissent. On March 16, 2022, the panel granted Plaintiffs’ third consent
motion for an extension, so a petition for rehearing or rehearing en banc is currently due on June 6, 2022. *Id.* ¶ 2. This case presents exceptionally important issues of federal constitutional law, including the extent of the government’s obligations under the Fifth Amendment to protect medically vulnerable people in its custody from the risk of severe illness and death.

2. The prior consent motion explained that the parties were “in the process of exchanging a second round of written [settlement] proposals” and discussing those proposals with the mediator, Magistrate Judge Wilner of the Central District of California. Dkt. 89 at 2. We are pleased to report that those settlement efforts are likely nearing completion for the issues addressed in this Court’s opinion. Plaintiffs expect that the settlement will resolve all issues related to the preliminary injunction and obviate any need to file a petition for rehearing or rehearing en banc.

Defendants do not oppose Plaintiffs’ request for an additional 30-day extension to seek rehearing en banc to allow a final effort at reaching an agreement or else to permit Plaintiffs a reasonable time to
prepare and file any forthcoming petition for rehearing or rehearing en banc in this matter. Declaration of Robert Loeb, ¶¶ 5, 7.

3. Granting a final 30-day extension to file a petition for rehearing or rehearing en banc in this appeal is necessary to help facilitate the mediation and settlement of this matter. Plaintiffs will not seek any additional extensions beyond the 30 days requested here. Id. ¶ 6.

In light of the above circumstances, explained in further detail in the attached declaration, Plaintiffs respectfully request that this Court grant this motion for a 30-day extension of time to file a petition for rehearing or rehearing en banc.

Date: May 23, 2022 Respectfully submitted,

/s/ Robert M. Loeb
Robert M. Loeb
Lauren A. Weber
ORRICK, HERRINGTON & SUTCLIFFE LLP
1152 15th Street, NW
Washington, DC 20005
(202) 339-8400

Counsel for Plaintiffs-Appellees
No. 20-55634

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

FAOUR ABDALLAH FRAHAT ET AL.,

Plaintiffs-Appellees,

v.

U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT ET AL.,

Defendants-Appellants.

DECLARATION OF ROBERT M. LOEB IN SUPPORT OF MOTION FOR A FINAL EXTENSION OF TIME TO FILE A PETITION FOR REHEARING OR REHEARING EN BANC

I, Robert M. Loeb, declare and state as follows:

1. I am an attorney at law admitted to practice before this Court. I am counsel for Plaintiffs in this matter. This declaration is submitted in support of Plaintiffs’ motion for a final 30-day extension of time to file a petition for rehearing or rehearing en banc. I have personal knowledge of the matters set forth below, and, if called upon, could and would testify competently thereto.
2. On March 16, 2022, the panel granted a consent motion for an extension of time to file a petition for rehearing or rehearing en banc. A petition for rehearing or rehearing en banc is currently due on June 6, 2022.

3. Plaintiffs seek a final 30-day extension to and including July 6, 2022, to file a petition for rehearing or rehearing en banc.

4. As demonstrated by the majority and dissenting opinions, this case raises complex and important constitutional questions.

5. The parties have been actively discussing settlement of this matter. Plaintiffs expect that the settlement will resolve all issues related to the preliminary injunction and obviate any need to file a petition for rehearing or rehearing en banc. The requested extension is necessary to allow the parties time to finalize a settlement proposal that Plaintiffs expect will resolve all issues related to the preliminary injunction and obviate any need to file a petition for rehearing or rehearing en banc.

6. Plaintiffs will not seek any further extensions beyond the 30 days sought in this motion.
7. Defendants, through their counsel Jeffrey Robins, have stated that they do not oppose Plaintiffs’ request for an additional 30-day extension to seek rehearing en banc to allow a final effort at reaching an agreement or else to permit Plaintiffs a reasonable time to prepare and file any forthcoming petition for rehearing or rehearing en banc in this matter.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 23, 2022.

Respectfully submitted,

/s/ Robert M. Loeb
Robert M. Loeb
Orrick, Herrington & Sutcliffe LLP
1152 15th Street, NW
Washington, DC 20005
(202) 339-8400
Counsel for Plaintiffs-Appellees
FAOUR ABDALLAH FRAIHAT; MARCO MONTOYA AMAYA; RAUL ALCOCER CHAVEZ; JOSE SEGOVIA BENITEZ; HAMIDA ALI; MELVIN MURILLO HERNANDEZ; JIMMY SUDNEY; JOSE BACA HERNANDEZ; EDILBERTO GARCIA GUERRERO; MARTIN MUNOZ; LUIS MANUEL RODRIGUEZ DELGADILLO; RUBEN DARIO MENCIAS SOTO; ALEX HERNANDEZ; ARISTOTELES SANCHEZ MARTINEZ; SERGIO SALAZAR ARTAGA; INLAND COALITION FOR IMMIGRANT JUSTICE; AL OTRO LADO,

Plaintiffs-Appellees,

v.

U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; U.S. DEPARTMENT OF HOMELAND SECURITY; ALEJANDRO N. MAYORKAS; TAE D. JOHNSON; STEVE K. FRANCIS; COREY PRICE; PATRICK J. LECHLEITNER; STEWART D. SMITH; JACKI BECKER KLOPP; DAVID P. PEKOSKE,

Defendants-Appellants.

No. 20-55634

D.C. No.
5:19-cv-01546-JGB-SHK
Central District of California,
Riverside

ORDER

Before: BERZON, MILLER, and BRESS, Circuit Judges.

Appellees’ unopposed motion for a final 30-day extension of time within which to file a petition for rehearing is GRANTED. See Dkt. No. 91. Any petition
shall be filed on or before July 6, 2022.
Subject: RE: [EXTERNAL] Fraihat

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In short, the decision on whether to agree to jointly seek a further extension of Plaintiffs’ en banc deadline is closely tied.

The three most pressing questions for ICE at the moment regarding Plaintiffs’ settlement proposal are:
(b)(5)
Apologies again for the delay. We will get this to you this afternoon.

Sent from my iPhone

On May 10, 2022, at 2:12 PM, [redacted] wrote:

Good afternoon [redacted],
Following up on our previous request, do you have an estimate on when we can expect OIL’s thoughts on agreeing, or not agreeing, to another extension to file the en banc review?

Thanks in advance,

Acting Deputy Chief, on detail
Office of the Principal Legal Advisor
District Court Litigation Division
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
p: 404-895-[redacted]
c: 703-200-[redacted]

https://eserviceregistration.ice.gov/

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From: [redacted]
Sent: Friday, May 6, 2022 12:55 PM
To: [redacted]
Subject: RE: [EXTERNAL] Fraihat

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Thanks

I'll pass that along and we'll get you something today.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From:

Sent: Friday, May 06, 2022 12:52 PM

To:
May 16, 2022

Counsel,

Further to our conversations on May 5, 2022, and May 13, 2022, I write to confirm Plaintiffs’ interest in resolving the COVID-related issues of this case through an extension of the status quo reflected in the preliminary injunction (PI), ECF No. 132, and the Pandemic Response Requirements (PRR), updated on April 4, 2022. Plaintiffs understand that Defendants anticipate further revisions to the PRR based on the May 3, 2022, guidance of the Centers for Disease Control and Prevention (CDC) relating to correctional and detention facilities. As discussed, Plaintiffs will provide Defendants their feedback about the May 3 CDC guidance and expect to do so promptly.

Plaintiffs propose that the extension of the PI/PRR last for twelve months, beginning on June 6, 2022, on the basis of an agreement between the parties that Plaintiffs could draft and provide to Defendants for their review upon confirmation that Defendants are amenable to this proposal. We propose this extension take place through delayed revisions of the custody-related sections of the PRR. This would give your clients an opportunity to quickly release vulnerable people in detention despite any operational pressures that exist, and would also reflect the reality that, although many communities have moved on from the pandemic, vulnerable people in detention have no such option and are still at considerable risk. This would also alleviate the need for those people to seek further, updated relief in court.

Because the PI/PRR doesn’t address limits on the re-detention of Fraihat subclass members, Plaintiffs wish to continue to negotiate that issue with Defendants, separate from the extension of the PI/PRR that Plaintiffs propose. Otherwise, Plaintiffs are willing to let go of the other terms within their COVID-related proposals dated April 14, 2022, that either exceed or aren’t required under the PI/PRR. It is important to our clients to continue attempting to resolve the COVID-related issues in this case as part of the larger negotiations.

If your clients confirm to you the concerns you voiced to me on their behalf about the timeframes defined in the PI/PRR for the identification of risk factors and for the provision of custody reviews, please let me know as soon as possible, so we can discuss those concerns further by phone. As discussed, if your clients can suggest specific timeframes, that would be helpful. I’ve received negotiating authority on those issues from the subclass representatives and the organizational Plaintiffs.

Please otherwise alert me of any other questions or concerns that your clients have as soon as possible. Given the imminent deadline to petition for review en banc of the Ninth Circuit’s decision on the PI, Plaintiffs need to know no later than May 20, 2022 Defendants’ position on the updated, COVID-related proposals that this letter reflects.

Fraihat v. ICE, Case No. 5:19-cv-01546-JGB-SHK (C.D. Cal.)
CONFIDENTIAL RULE 408 COMMUNICATION
FOR SETTLEMENT PURPOSES ONLY
SUBJECT TO THE TERMS OF THE APPLICABLE PROTECTIVE ORDERS
2022-ICLI-00045  5130
Sincerely,

Elizabeth B. Jordan
Director, Immigration Detention Accountability Project
CIVIL RIGHTS EDUCATION & ENFORCEMENT CENTER
1245 E Colfax Ave Ste 400
Denver, CO 80218
ejordan@creeclaw.org

Counsel for Plaintiffs
December 16, 2021

Hon. Alejandro Mayorkas
Secretary of Homeland Security
U.S. Department of Homeland Security
2707 Martin Luther King Jr. Avenue SE
Washington, DC 20528

Hon. Tae D. Johnson
Acting Director
U.S. Immigration and Customs Enforcement
500 12th Street SW
Washington, DC 20536

Damon T. Hninger
President and CEO
CoreCivic
10 Burton Hills Blvd.
Nashville, TN 37215

Dear Secretary Mayorkas, Acting Director Johnson, and Mr. Hninger:

We write to request the Department of Homeland Security (DHS) conduct increased oversight on CoreCivic’s management of Torrance County Detention Facility (Torrance) in Estancia, New Mexico and for ICE and CoreCivic to implement immediate remedial measures addressing current barriers to legal counsel and language interpretation services experienced by Haitian asylum seekers detained at this facility.

In May 2021, DHS publicly stated it would not tolerate the mistreatment of individuals in civil immigration detention or substandard conditions of detention.¹ Yet, the Department continues to detain individuals at Torrance, which failed an ICE-contracted inspection less than four months ago.² In the year leading up to the failed inspection, Torrance received 43 grievances from individuals detained at the facility regarding safety concerns, medical care, and food violations.³ The fact that Torrance had advance notice of the inspection, and still failed it, underscores the deeply rooted structural problems at the facility.⁴

Approximately two months after Torrance failed its inspection, ICE transferred into the facility a group of approximately 80 Haitian migrants. Some of these individuals suffered inhumane abuse in Del Rio, Texas at the hands of U.S. Border Patrol (USBP), actions which were strongly

⁴ Id.
condemned by the American public and President Biden. At Torrance, these individuals have faced severe barriers to legal representation, prohibiting them from being able to prepare for their asylum hearings, which are scheduled in an immigration court with an asylum denial rate of 93%.\textsuperscript{5} It took over two months for ICE to grant a group of attorneys and legal representatives permission to speak with many of these individuals,\textsuperscript{6} during which at least four were given deportation orders who had not had access to legal representation. Providing detainees with access to legal services, particularly for non-English and non-Spanish speakers, is integral to a fair and just immigration system.

Furthermore, due to CoreCivic’s failure to provide language interpretation services, Haitian Creole-speaking detainees are unable to communicate with detention officers present at the facility. Documented onsite visits reveal CoreCivic staff have provided individuals limited information about the asylum process and without interpretation to Haitians in Creole. On the rare occasions that attorneys had success meeting with Haitian detainees, they were also not provided interpretation services to effectively communicate with their clients. Due to the lack of interpretation services and the steep barriers blocking access to counsel, Haitian asylum seekers detained in Torrance face the nearly impossible task of being prepared for their immigration hearings and thus finding refuge in the United States.

Lastly, given that some of the Haitian migrants at Torrance were subject to the USBP’s abusive treatment in Del Rio, Texas, DHS must take all necessary actions to ensure that potential witnesses are not removed from the United States pending the Office of Professional Responsibility’s investigation on such abuse. For this reason, and the aforementioned barriers to legal representation at Torrance, we request DHS and ICE take the following actions:

1) Conduct immediate, comprehensive oversight on CoreCivic’s management of Torrance to ensure:
   - Attorneys can schedule attorney/client calls on a regular basis that are free, confidential, and unlimited in time;
   - Detainees and attorneys are provided unfettered access to ICE’s language interpretation call-line; and
   - Haitian detainees have interpretation services to understand ICE-provided information on the asylum process, such as legal orientations and informational videos.

2) Work with the Executive Office for Immigration Review to extend the immigration hearing dates for those detained at Torrance until they receive the counsel that has been unduly inaccessible to them.

Thank you for your attention and we look forward to hearing about the actions you will expeditiously take to remediate these issues.

\textsuperscript{5} TRAC: “Asylum Decisions (El Paso-EPD Immigration Court).” https://trac.syr.edu/phptools/immigration/asylum/  
Sincerely,

MARTIN HEINRICH
United States Senator

BEN RAY LUJÁN
United States Senator

MELANIE STANSBURY
United States Representative

TERESA LEGER FERNANDEZ
United States Representative
From: Anderson, Sandra D
Sent: Fri, 22 Apr 2022 18:45:35 +0000
To: Davis, Mike (b)(6); (b)(7)(C)
Lolacono, Adam V (b)(6); (b)(7)(C)
Padilla, Kenneth (b)(6); (b)(7)(C)
Cc: (b)(6); (b)(7)(C)
Subject: RE: FOR SES APPROVAL- 22-01471-U.S. Senator Martin Heinrich and 3 Members of Congress Write S1 re CoreCivic's Management of the Torrance County Detention Facility

Cleared.

Sandra D. Anderson
Chief Counsel
Office of the Principal Legal Advisor, Los Angeles
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
(213) 80-8 (b)(6) (cell)

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From: (b)(6); (b)(7)(C)@ice.dhs.gov
Sent: Friday, April 22, 2022 10:11 AM
To: Anderson, Sandra D (b)(6); (b)(7)(C)@ice.dhs.gov; Davis, Mike P (b)(6); (b)(7)(C)@ice.dhs.gov; Lolacono, Adam V (b)(6); (b)(7)(C)@ice.dhs.gov; Padilla, Kenneth (b)(6); (b)(7)(C)@ice.dhs.gov
Cc: (b)(6); (b)(7)(C)@ice.dhs.gov
Subject: FOR SES APPROVAL- 22-01471-U.S. Senator Martin Heinrich and 3 Members of Congress Write S1 re CoreCivic's Management of the Torrance County Detention Facility

Good afternoon, SES Team:

This task is due as soon as practicable and SES approval is required.

Background
OPLA has been asked to review the attached response to Senator Martin Heinrich and 3 Members of Congress who wrote to ICE regarding CoreCivic’s management of the Torrance County Detention Facility. The accompanying pdf is the incoming letter from Senator Heinrich to ICE.

Components:

ERO drafted a response and recommended OPLA’s review.

OCR provided edits.

OPR and ORAP cleared without comments or edits.

Divisions:

EROOLD provided comments and an edit.

ILPD provided a comment and an edit.

ECU provided a minor grammatical edit and highlighted OPLA’s comments in yellow for ease of reference.

Recommended Closing

OPLA reviewed for legal sufficiency and provides the attached comments (highlighted in yellow) and edits. For substantive questions, please contact OPLA Executive Communications Unit (ECU) Associate Legal Advisor (b)(6); (b)(7); (C) (202) 604 (b)(6); OPLA’s closing response is cleared by

(b)(6); (b)(7); (C)
Chief, Executive Communications Unit
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
500 12th Street SW (b)(6);
Washington, DC 20536
Office: (202) 732 (b)(6);
Mobile: (703) 58 (b)(7); (C)

U.S. Immigration and Customs Enforcement

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Hello OPLA,

A Clearance has been assigned to you. Please accept in 1 day

Clearance Name: **CL-22-01471 Assigned To OPLA**

Due Date: 04/22/2022 12:30 PM Eastern

Instructions:

---Good afternoon OPLA,
Please review the below-listed documents and provide comment/clearance. Thank you!

22-01471-04.20-Senator Martin Heinrich Cover letter - dpau edits (003) -OCR.docx

22-01471 (WF-1230864)_Heinrich_I_12.16.21.pdf

Thank you,

ICATT System
I'm looping (b)(6); (b)(7)(C) who may be plugging into this case after today and until a new immigration deputy comes onboard.

(b)(6); (b)(7)(C)
Deputy General Counsel
U.S. Department of Homeland Security

(202) 836-1 (b)(6))

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So that attempt at scheduling didn’t work. Here’s Plaintiffs’ response.

Any chance we can work with their hours on 5/17, and if not, what works for ICE the following week?

We can meet between 10:30 and 2:00 Pacific on 5/17. I also should clarify that, based on our previous meetings, we’re working under the assumption that this would be a two-hour session.

In the event the 5/17 times won’t work, our availability the week of May 23 is as follows (all times Pacific):

May 23: any time in the afternoon
May 24: 1:00p – 3:00p
May 25: 9:00a – noon
May 26: 11:30a – 2:00p
May 27: 10:30a – 4:00p

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-
Hi,

Yes, we will work to have the proposal to OIL by 5/11 and we will work on a position on another potential extension of the deadline for Plaintiffs’ to file a petition en banc.

Regarding the next mediations session, ICE’s availability is below.

- Monday (May 16)
- Tuesday between 10 and 2 (May 17)
- Friday from 9 to 3 (May 20)

Kind regards,

--- ATTORNEY/CLIENT PRIVILEGE --- ATTORNEY WORK PRODUCT ---

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b)(5)
(b)(5)
Hi, I’m writing to let you know that we’ve changed the hours of the Fraihat hotline, in the event it’s useful information for the platform operators. The hotline will now be staffed Monday – Friday, 1 p.m. – 3 p.m. Eastern. Please let me know if you have any questions. Thank you!

[EXTERNAL] Change in Fraihat hotline hours
From: (b)(6); (b)(7)(C)  
Sent: Fri, 22 Apr 2022 17:13:55 +0000  
To: #ICE OPA ERO Issue Papers  
Subject: OPA ISSUE: Inquiry related to detainee transfers to Torrance

**Issue:** Austin Fisher w/Source New Mexico, reached out about ICE transferring more people into the Torrance County Detention Facility despite calls from senators and members of Congress to transfer out and/or release everyone there. Reporter claims there are currently 139 ICE detainees at Torrance, including 50 transferred Friday, 30 transferred Saturday, and 31 transferred Tuesday. Reporter would like to know what the reason(s) are for transfers, asking whether there are other facilities nearby with space and without poor conditions cited in a recent OIG inspection.

**Deadline:** Today (ASAP)

**Statement attributable to an ICE spokesperson:** “U.S. Immigration and Customs Enforcement (ICE) is committed to ensuring that all those in the agency’s custody reside in safe, secure, and humane environments under appropriate conditions of confinement. In general, ICE continues to review immigration detention centers nationally, monitoring the quality of life and treatment of detained individuals among other factors relevant to the continued operation of each facility.”

**Additional background:**
- ICE makes custody determinations daily, on a case-by-case basis, and in accordance with U.S. law and Department of Homeland Security (DHS) policy, considering the merits and factors of each case while adhering to current agency priorities, guidelines, and legal mandates.
- Detainees transferred across ICE’s detention network are conducted in accordance with ICE Policy 11022.1 Detainee Transfers. Transfers take into consideration immediate family, attorney of record, and status of removal proceedings.
- Regarding OIG inspections, the ICE response is contained within reports as the ICE management response.

---

From: Austin Fisher <afisher@sourcenm.com>  
Sent: Friday, April 22, 2022 11:29 AM  
To: ICEMedia <ICEMedia@ice.dhs.gov>  
Subject: Media inquiry - Source New Mexico

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Hello,

I understand ICE has transferred more people into the Torrance County Detention Facility despite calls from senators and members of Congress to transfer out and/or release everyone there.
There are currently 139 ICE detainees at TCDF, including 50 that were transferred on Friday, about 30 that were transferred on Saturday and 31 that were transferred on Tuesday.

What is the reason(s) for these transfers? Aren’t there other facilities nearby with space and without the kind of poor conditions cites in OIG inspections?

My deadline is today at 5 p.m. Mountain.

Sincerely,

Austin Fisher
Reporter
Source New Mexico
From: Austin Fisher <afisher@sourcenm.com>
Sent: Friday, April 22, 2022 11:29 AM
To: ICEMedia <ICEMedia@ice.dhs.gov>
Subject: Media inquiry - Source New Mexico

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Hello,

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There are currently 139 ICE detainees at TCDF, including 50 that were transferred on Friday, about 30 that were transferred on Saturday and 31 that were transferred on Tuesday.

What is the reason(s) for these transfers? Aren’t there other facilities nearby with space and without the kind of poor conditions cites in OIG inspections?

My deadline is today at 5 p.m. Mountain.

Sincerely,

Austin Fisher
Reporter
Source New Mexico
Good morning, SES Team:

(b)(6); (b)(7)(C); (b)(5)

Chief, Executive Communications Unit
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
500 12th Street SW, (b)(6); (b)(7)(C)
Washington, DC 20536
Office: (202) 732- (b)(6);
Mobile: (703) 58- (b)(7)(C)

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Good morning, SES Team:

Currently, ECU has 3 tasks slated for SES clearance today.

**22-01138- 10:00AM – Chairs Bennie Thompson and Nanette Diaz Barragan Wrote DHS Regarding the Torrance County Detention Facility (TCDF) And a Recent DHS OIG Audit**
- Pending ECU

**22-01306- 12:00PM- 2022 U.S. Narrative of the Trafficking in Persons (TIP) Report**
- Pending ECU

**22-01251- 4:00PM- Noncitizen Veterans Directive**
- Pending FLO

---

Chief, Executive Communications Unit  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
U.S. Department of Homeland Security  
500 12th Street SW  
Washington, DC 20536  
Office: (202) 732-  
Mobile: (703) 587-

---

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March 24, 2022

The Honorable Alejandro Mayorkas
Secretary
U.S. Department of Homeland Security
245 Murray Lane, SW
Washington, DC 20528

Mr. Tae D. Johnson
Acting Director
U.S. Immigration and Customs Enforcement
1500 12th St., SW
Washington, DC 20356

Dear Secretary Mayorkas and Acting Director Johnson:

We write to express grave concern over the conditions in the Torrance County Detention Facility (TCDF) operated by CoreCivic in Estancia, New Mexico, as outlined by a recent Department of Homeland Security (DHS) Office of Inspector General (OIG) Management Alert. The DHS OIG inspected TCDF and found that the facility is critically understaffed with unsanitary conditions, which has created health and safety risks for detainees. ¹ To protect those in Immigration and Customs Enforcement (ICE) detention, we urge you to swiftly remove all individuals detained at TCDF and terminate ICE’s contract with the facility.

DHS OIG found that TCDF is severely understaffed, including significant shortages in medical and security personnel. Security personnel were not present in housing units, which can have significant implications for detainee safety and welfare, as detainees may have no one to contact in emergencies. In addition, DHS OIG staff observed unsanitary living conditions, including mold and numerous non-functioning toilets and faucets in detainee housing units.

We are disturbed that in its response to the OIG’s findings, ICE is defending CoreCivic’s repeated failures to resolve ongoing issues to preserve detention space rather than following the OIG’s recommendation to remove detainees from TCDF. ICE’s response is not only inconsistent with the inspection, but also with its own recent findings. On March 1, 2022, ICE issued a Contract Discrepancy Report stating, “The Torrance County Detention Facility (TCDF) located in Estancia, NM has been repeatedly in violation of the 2011 Performance Based National Detention Standards

(PBNDS) and the signed [Immigration and Customs Enforcement (ICE)/Enforcement and Removal Operations (ERO) Intergovernmental Service Agreement (IGSA)] contractual agreement...”

The Department has stated that it “will not tolerate the mistreatment of individuals in civil immigration detention or substandard conditions of detention.” We urge you to follow through on that commitment by immediately removing detainees from TCDF and ending the contractual agreement with the facility.

Sincerely,

Bennie G. Thompson
Chairman

Nanette Diaz Barragán
Chairwoman
Subcommittee on Border Security, Facilitation, & Operations

---

2 Ibid. (emphasis added)
(b)(5)
(b)(6); (b)(7)(C); (b)(5)
From: [Redacted]
Sent: Mon, 11 Apr 2022 14:04:34 +0000
To: [Redacted]
Cc: [Redacted]
Subject: RE: FOR SES APPROVAL-22-01138- Chairs Bennie Thompson and Nanette Diaz Barragan Write DHS re the Torrance County Detention Facility (TCDF) and a Recent DHS OIG Audit

Cleared.

Chief Counsel, Chicago
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement

With honor and integrity, we will safeguard the American people, our homeland, and our values.

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From: [Redacted]; @ice.dhs.gov
Sent: Monday, April 11, 2022 8:33 AM
To: [Redacted]; @ice.dhs.gov; Cheng, Wen-Ting; @ice.dhs.gov; Davis, Mike P; @ice.dhs.gov; Guzman, Nicole G; @ice.dhs.gov; Loiacono, Adam V; @ice.dhs.gov; Padilla, Kenneth; @ice.dhs.gov; OPLA; @ice.dhs.gov
Cc: [Redacted]; @ice.dhs.gov
Subject: FOR SES APPROVAL-22-01138- Chairs Bennie Thompson and Nanette Diaz Barragan Write DHS re the Torrance County Detention Facility (TCDF) and a Recent DHS OIG Audit

Good morning, SES Team:

This task is due at 10:00AM today, and SES approval is required.

Background:
OPLA has been tasked to review the attached response to Chairs Bennie Thompson and Nanette Diaz Barragan letter regarding the Torrance County Detention Facility (TCDF) and a Recent DHS OIG Audit, 22-005. The accompanying PDF is the incoming letter from the Chairman.
Components:

ERO drafted the response.

OAQ provided comments.

OCR provided minor edits.

OCFO, OPR, and ORAP all cleared without edits or comments.

Divisions:

EROLD provided edits and comments.

GILD provided edits.

Recommended closing:
OPLA reviewed for legal sufficiency and provides the attached document with edits and comments for consideration. For questions regarding substantive legal issues, please contact OPLA ECU Associate Legal Advisor. OPLA’s closing response is cleared by:

Chief, Executive Communications Unit
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
500 12th Street SW, Room 571
Washington, DC 20536
Office: (202) 576-8300
Mobile: (703) 576-8300

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Hello OPLA,

A Clearance has been assigned to you. Please accept in 1 day

Clearance Name: CL-22-01138 Assigned To OPLA

Due Date: 04/11/2022 10:00 AM Eastern

Instructions:

Good morning OPLA.
Please review the below-listed documents and provide comment/clearance. Thank you!

22-01138-04.07-(WF-1229919)_Thompson Response_v04.06.22.docx

22-01138 (WF-1229919)_Thompson_I_03.24.22.pdf

Thank you,

ICATT System
Good morning, SES Team:

Currently, ECU has 3 tasks slated for SES clearance today.

22-01238- 10:00AM – NSC- DSG on Hemispheric Migration
   • Pending EROLD

22-00414- 11:00AM- Ranking Member Johnson writes requesting data regarding immigration encounters at the Southwest Border for the year of 2021
   • Pending EROLD

22-01226- 1:00PM- Torrance Briefing get-backs CHS and Stansbury
   • Pending GILD

Chief, Executive Communications Unit
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
500 12th Street SW
Washington, DC 20536
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Mobile: (703) 587-

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Thank you.

I note that opposing counsel sent along a more narrow list of questions than what we anticipated, and I’ve attached again (and pasted below). Please confirm whether ICE just wants us to respond to these questions, or whether there are any other points you’d like us to include, like [b](5)

Additionally, opposing counsel did send us their expert’s thoughts regarding the latest CDC guidance, which we promptly forwarded to you. May we say that [b](5)

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616 [b](6)

From [b](6); [b](7)(C)
Sent: Tuesday, May 31, 2022 4:21 PM
To: @ice.dhs.gov> (b)(6); (b)(7)(C) @usdoj.gov>
(b)(6); (b)(7)(C) @ice.dhs.gov> (b)(6); (b)(7)(C) @hq.dhs.gov>
Cc: Loiacono, Adam V @ice.dhs.gov> (b)(6); (b)(7)(C) @hq.dhs.gov>
(b)(6); (b)(7)(C) @ice.dhs.gov> (b)(6); (b)(7)(C) @hq.dhs.gov>
(b)(6); (b)(7)(C) @usdoj.gov>
(b)(6); (b)(7)(C) @usdoj.gov>
(b)(6); (b)(7)(C) @usdoj.gov>
Subject: RE: [EXTERNAL] Fraihat

Assistant General Counsel for Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(202) 740

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From: @ice.dhs.gov>
Sent: Tuesday, May 31, 2022 4:19 PM
To: @usdoj.gov> (b)(6); (b)(7)(C) @ice.dhs.gov>
Cc: Loiacono, Adam V @ice.dhs.gov> (b)(6); (b)(7)(C) @hq.dhs.gov>
(b)(6); (b)(7)(C) @hq.dhs.gov> (b)(6); (b)(7)(C) @hq.dhs.gov>
(b)(6); (b)(7)(C) @hq.dhs.gov> (b)(6); (b)(7)(C) @hq.dhs.gov>
(b)(6); (b)(7)(C) @hq.dhs.gov> (b)(6); (b)(7)(C) @hq.dhs.gov>
Subject: RE: [EXTERNAL] Fraihat

Hi

Below please find ICE's responses to Plaintiffs' follow up questions, in red:

(b)(5)
Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-5

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From:_________________________@usdoj.gov
Sent: Friday, May 27, 2022 5:31 PM
To: Loiacono, Adam V (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov;
Cc: Loiacono, Adam V (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov;
(b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov>
Subject: Re: [EXTERNAL] Faihat

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Ok, thanks.

Sent from my iPhone

On May 27, 2022, at 4:52 PM (b)(6); (b)(7)(C) @ice.dhs.gov wrote:

Hi (b)(6);
Sorry for the delay. We’ve forwarded all the questions to ERO. I’ve requested an ETA but it doesn’t appear it will be today.

(b)(6); (b)(7)(C)

Sent with BlackBerry Work
(www.blackberry.com)

From: ___________________________@usdoj.gov
Date: Friday, May 27, 2022, 1:27 PM
To: Loiacono, Adam V (b)(6); (b)(7)(C) @ice.dhs.gov
Cc: ___________________________@hq.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov;
 ___________________________@hq.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov;
 ___________________________@ice.dhs.gov> (b)(6); (b)(7)(C) @ice.dhs.gov>
 ___________________________@ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6);
 ___________________________@usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov>
 ___________________________@usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov; (b)(6);
 ___________________________@ice.dhs.gov>
Subject: Re: [EXTERNAL] Faihat
Happy holiday Friday. Just following up to see if we can expect and answer in these today to send along to opposing counsel, and if not, if we can have an eta. Thanks.

Sent from my iPhone

On May 25, 2022, at 4:30 PM, Loiacono, Adam V [b](6); (b)(7)(C) @ice.dhs.gov wrote:

Adding our other [b](6), who I should I have included before.

Thanks [b](6) These definitely do not seem to be a heavy lift. We will circle with [b](6) and get back to you.

Adam V. Loiacono
Deputy Principal Legal Advisor for Enforcement and Litigation
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
Iphone: 202-500[b](6); (b)(7)(C) @ice.dhs.gov

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From: [b](6); (b)(7)(C) @usdoj.gov>
Sent: Wednesday, May 25, 2022 4:25 PM
To: Loiacono, Adam V [b](6); (b)(7)(C) @ice.dhs.gov>
Cc: [b](6); (b)(7)(C) @hq.dhs.gov>

Subject: RE: [EXTERNAL] Faihat

2022-ICLI-00045 5191
Please also find below the follow-up questions sent by opposing counsel, for which they’ve requested a response by the end of the week. Notably, I think we’ve answered both of these with assistance at the mediation session and likely don’t have much more to add — but getting a response in writing would help move things along with opposing counsel.

Thanks,

[b](6); (b)(7)(C)

Hi [b]and team,

Thank you for a productive meeting today. As discussed, here are the questions we’d appreciate clarification on coming out of your proposal emailed this morning. Respectfully, we ask for answers by the end of the week, as we need them to consult with our clients and prepare a response along the time frame we discussed today.

(b)(5)

[b](6); (b)(7)(C)
Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: Loiacono, Adam V [b](6); (b)(7)(C) @ice.dhs.gov>
Sent: Monday, May 23, 2022 9:04 PM
To: [b](6); (b)(7)(C) @usdoj.gov> [b](6); (b)(7)(C) @hq.dhs.gov>
Cc: [b](6); (b)(7)(C) @usdoj.gov> [b](6); (b)(7)(C) @hq.dhs.gov>
[b](6); (b)(7)(C) @hq.dhs.gov> [b](6); (b)(7)(C) @ice.dhs.gov>; Loiacono, Adam V
Subject: RE: [EXTERNAL] Fraihat
Thanks. We will get folks thinking about those issues as we await a response from Plaintiffs.

Adam V. Loiacono
Deputy Principal Legal Advisor for Enforcement and Litigation
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement

Phone: 202-50[ (b)(6);
(b)(6); (b)(7)(C) @ice.dhs.gov

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From: (b)(6); (b)(7)(C) @usdoj.gov
Date: Monday, May 23, 2022, 5:41 PM
To: Loiacono, Adam V [ (b)(6); (b)(7)(C) @ice.dhs.gov ]; (b)(6); (b)(7)(C) @hq.dhs.gov
Cc: (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) 

Subject: RE: [EXTERNAL] Fraihat

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Thanks again for sharing this.

Here's a quick readout from my perspective here.
Please let me know if you have any questions or whether further discussion would be helpful in advance of receiving further correspondence from Plaintiffs' counsel.

Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: Loiacono, Adam V [b](6); [b](7)(C) [ice.dhs.gov>
Sent: Monday, May 23, 2022 11:05 AM
Tc [b](6); [b](7)(C) [usdoj.gov>
Cc [b](6); [b](7)(C) [hq.dhs.gov>
[b](6); [b](7)(C) [hq.dhs.gov>
[b](6); [b](7)(C) [ice.dhs.gov>
[b](6); [b](7)(C) [ice.dhs.gov>
Subject: RE: [EXTERNAL] Fraihat

Adding a few OPLA folks.

I removed all but the mediation confidentiality marking. This was intended for Plaintiffs, but we had those markings on while it was being reviewed and cleared.

(b)(5)

(b)(5)
Thanks,

Adam V. Loiacono  
Deputy Principal Legal Advisor for Enforcement and Litigation  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
Phone: 202-500-\(\text{(b)(6)}; \text{(b)(7)(C)}\)  
\text{%@ice.dhs.gov}\(\text{(b)(6); (b)(7)(C)}\)

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From: \text{(b)(6); (b)(7)(C)}@usdoj.gov>  
Sent: Monday, May 23, 2022 10:33 AM  
To: \text{(b)(6); (b)(7)(C)}@hq.dhs.gov>  
Cc: Loiacono, Adam V \text{(b)(6); (b)(7)(C)}@ice.dhs.gov>  
\text{(b)(6); (b)(7)(C)}@hq.dhs.gov>  
\text{(b)(6); (b)(7)(C)}@hq.dhs.gov>  
\text{(b)(6); (b)(7)(C)}@hq.dhs.gov>  
\text{(b)(6); (b)(7)(C)}@hq.dhs.gov>

Subject: RE: [EXTERNAL] Fraihat

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Thanks. As currently marked re privilege I would appear to be prohibited from sharing this with opposing counsel in this form or other substance. Can you please confirm what I may share with them, and tweak the headers as needed if I’m cleared to send this counter?

Also, would there \(\text{(b)(5)}\)

\text{(b)(5)}

Deputy Director  
Office of Immigration Litigation  
District Court Section  
(202) 616-\(\text{(b)(6); \text{(b)(7)(C)}\)}\)

From: \text{(b)(6); (b)(7)(C)}@usdoj.gov>  
Sent: Monday, May 23, 2022 10:20 AM  
To: \text{(b)(6); (b)(7)(C)}@usdoj.gov>  
Cc: Loiacono, Adam V \text{(b)(6); (b)(7)(C)}@ice.dhs.gov>  
\text{(b)(6); (b)(7)(C)}
Subject: FW: [EXTERNAL] Fraihat

I am attaching our revised offer. Note that there may be

We’re happy to set up a call to discuss.

Best,

Assistant General Counsel for Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(202) 744-...

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From: (b)(6); (b)(7)@usdoj.gov
Sent: Monday, May 23, 2022 10:14 AM
To: (b)(6); (b)(7)@ice.dhs.gov
Cc: (b)(6); (b)(7)@hq.dhs.gov

Subject: RE: [EXTERNAL] Fraihat

Here is the Zoom info for today.
Hi there,

Judge Michael R. Wilner is inviting you to a scheduled ZoomGov meeting.

Join Zoom Meeting

Meeting URL:  https://cadc-uscourts.zoomgov.com/j/1610090070?pwd=L0qrVEIzWDgxM2NVUEErczN6Zkc5dz09
Meeting ID:  161 009 0070
Passcode:  695025

Join by Telephone

For higher quality, dial a number based on your current location.
Dial:

US: +1 669 254 5252 or +1 669 216 1590 or +1 551 285 1373 or +1 646 828 7666

International numbers

Join from an H.323/SIP room system

H.323:  161.199.138.10 (US West)
        161.199.136.10 (US East)
SIP:  1610090070@sip.zoomgov.com
Passcode:  695025

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Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616- 

From: (b)(6); (b)(7)(C)
Sent: Friday, May 20, 2022 2:00 PM
To: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov
Cc: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov
Subject: RE: [EXTERNAL] Fraihat

Thanks: (b)(6);

Correspondence from opposing counsel here. Please let me know ICE’s responses to the bolded questions.

Hi: (b)(6);

If you could please write back to Judge Wilner ASAP to see if Monday 5/23 10 am PT still works for him, explaining the delay in closing the loop with him, and cc’ing me, I’d be grateful.

On the extension motion, my team really can’t afford any further delay. We’d love to be able to file it with your clients’ consent and to ask for an amount of time that’s consistent with your clients’ needs in considering our revised proposal (e.g., 30, 45, or 60 days). If you can assure us that you’ll have an answer on the extension motion ready for us by Monday morning, we can hold off filing before then. If
you can’t assure us of that, then we’re going to need to go ahead and file today. Either way, please let me know ASAP today.

Additionally, my team would be grateful to know ASAP any questions or concerns your clients have so far about the revised proposal, ideally ahead of the parties’ next meeting with Judge Wilner. Are there any you can identify? What, otherwise, do you propose for an agenda for the next meeting with Judge Wilner? Please let me know ASAP.

I’m available for a call today, if that’d be helpful. If you’d like to talk, please let me know when works for you.

If Judge Wilner can’t meet with us on Monday, I’ll update him about the status of what’s been going on between the parties.

Thanks

---

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

---

From: @ice.dhs.gov
Sent: Friday, May 20, 2022 11:18 AM
To: @usdoj.gov; @ice.dhs.gov; @hq.dhs.gov; @usdoj.gov; @ice.dhs.gov
Cc: @hq.dhs.gov; @hq.dhs.gov; @usdoj.gov; @ice.dhs.gov

Subject: RE: [EXTERNAL] Frialah

Hi

---
Both our proposal and potential position on another extension for Plaintiffs to file a petition *en banc* are currently with the Front Office. We hope to have an update soon.

Kind regards,

---

(2)(6); (b)(7)(C)

[265x35] (2)(6); (b)(7)(C)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20539
Mobile: (202) 253-

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---

From: (b)(8); (b)(7)(C) @usdoj.gov
Sent: Friday, May 20, 2022 11:02 AM
To: (b)(8); (b)(7)(C) @ice.dhs.gov
Cc: (b)(8); (b)(7)(C) @hq.dhs.gov; (b)(8); (b)(7)(C) @usdoj.gov

Subject: RE: [EXTERNAL] Fraihat
ICE, despite the ask for a check in yesterday, I have really heard nothing here (other than a side bar question from DHS).

Because Plaintiffs’ en banc filing deadline is June, Ninth Circuit rules require that they file for an extension no later than Monday 5/23. That is why they ask for our position no later than today. If they need to file Monday and we take no position, we will need to come up with a position and/or statement immediately thereafter so that we can file a response – and there will be an implicit message about our views on mediation (which ICE and DHS may have some insight into, but none has been shared with DOJ).

Similarly, we had initially requested responses to Plaintiffs’ latest settlement proposal by May 10, to which we agreed a short extension would be reasonable given developments with the CDC guidance. But now, on the eve of Monday’s mediation session, we have not responded in writing to opposing counsel’s APRIL 18 proposal, and even if ICE submits to DOJ comments or redlines today, we will not be able to review them in any meaningful way to be comfortable providing them to opposing counsel in advance of Monday’s scheduled session.

Please get us answers and updates regarding the en banc extension question and the status of comments on Plaintiffs’ latest proposal immediately.

In addition to needing to convey what the government’s position regarding Plaintiffs’ anticipated extension motion, we need to be able to communicate reasonably with opposing counsel and Magistrate Judge Wilner regarding Monday’s mediation – which DOJ is unable to prepare for.
Subject: RE: [EXTERNAL] Fraihat

One observation that I’ve been noodling on that may be helpful for ICE’s decision making here.

Please do check in today to let us know where things are, and note that Plaintiffs requested a response by tomorrow and are not unreasonable in wanting to determine if they need to seek a further en banc extension, what they can say with regard to our position, what we all could say with regard to the progress of mediation, and all in time to have a decision from the Ninth Circuit while they approach an important filing deadline for them.
Folks, just checking in on all of this please.

Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From: (b)(6); (b)(7)(C)
Sent: Monday, May 16, 2022 2:53 PM

Subject: RE: [EXTERNAL] Fraihat

(b)(6); and all,

Please see follow-along correspondence from Plaintiffs’ counsel, and initial response to your questions:
The attached correspondence addresses Plaintiffs' position here, let me know if ICE has additional questions.

(b)(6); (b)(7)(C)
Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616- (b)(6);

From: (b)(6); (b)(7)(C) @ice.dhs.gov>
Sent: Monday, May 16, 2022 1:49 PM
To: (b)(6); (b)(7)(C) @usdoj.gov>
Cc: (b)(6); (b)(7)(C) @hq.dhs.gov>
   (b)(6); (b)(7)(C) @usdoj.gov>
   (b)(6); (b)(7)(C) @ice.dhs.gov>
   (b)(6); (b)(7)(C) @ice.dhs.gov>
   (b)(6); (b)(7)(C) @ice.dhs.gov>
   (b)(6); (b)(7)(C) @ice.dhs.gov>
   Padilla, Kenneth (b)(6); (b)(7)(C) @ice.dhs.gov>
   (b)(6); (b)(7)(C) @ice.dhs.gov>
   (b)(6); (b)(7)(C) @usdoj.gov>
   (b)(6); (b)(7)(C) @usdoj.gov>
   (b)(6); (b)(7)(C) @usdoj.gov>
   (b)(6); (b)(7)(C) @usdoj.gov>
   (b)(6); (b)(7)(C) @usdoj.gov>

Subject: RE: [EXTERNAL] Fraihat

Hi (b)(6);

After internal discussions, ICE has a few additional questions for OIL’s consideration and we kindly request legal counsel on next steps, which are consolidated below:
Lastly, ICE is available for the mediation session on May 23 from 1pm-3pm ET. Given the upcoming mediation session, could OIL provide responses to ICE by COB tomorrow, 5/17?

Kind regards,

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From: (b)(5) @usdoj.gov
Sent: Monday, May 16, 2022 1:28 PM
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And on scheduling, both Plaintiffs and the SM indicate that they are available at 10 am PST the morning of 5/23. Can we please confirm and get this scheduled?

Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

Sent: Monday, May 16, 2022 1:12 PM
To: [b](6); [b](7)(C)
Cc: [b](6); [b](7)(C)

From: [b](6); [b](7)(C)
Subject: RE: [EXTERNAL] Fraihat

Thanks

I've followed up with them, but I understand that both options are still on the table for them.

One element that we discussed re this proposal (which we haven't seen yet), would be agreeing to permit ICE some additional time regarding initial screening and custody determinations (although they indicated that something like 60 days to complete a custody redetermination would be too long).
Hi (b)(6); (b)(7)(C)

Are Plaintiffs still working on a proposal to potentially not pursue en banc if ICE agrees to some form of status quo (based on your previous email re the pros and cons of another extension), or is this request for another extension an indication that they decided not to propose a proposal like that?

Kind regards,
(b)(6); (b)(7)(C)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253- (b)(6);

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From (b)(6); (b)(7)(C) @usdoj.gov
Sent: Friday, May 13, 2022 5:31 PM
To (b)(6); (b)(7)(C) @ice.dhs.gov
Cc (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @hq.dhs.gov
(b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; Padilla, Kenneth
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov
(b)(6); (b)(7)(C) @ice.dhs.gov; Loeza, (b)(6); (b)(7)(C) @usdoj.gov
(b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; Davis, Mike P

2022-ICLI-00045 5208
From: MRWChambers (b)(6); (b)(7)(C) @cad.uscourts.gov
Sent: Monday, April 25, 2022 1:23 PM
To: (b)(6); (b)(7)(C) @usdoj.gov; MRWChambers (b)(6); (b)(7)(C) @cad.uscourts.gov; (b)(6); (b)(7)(C) @creelaw.org
Cc: (b)(6); (b)(7)(C) @dralegal.org; (b)(6); (b)(7)(C) @splcenter.org;
(b)(6); @orrick.com (b)(6); @willkie.com (b)(6); usdoj.gov
Subject: RE: Fraihat: canceling 4/12 session

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Got it. I can be available on the California morning of 5/17 or 5/18.

From: (b)(6); (b)(7)(C) @usdoj.gov
Sent: Monday, April 25, 2022 10:57 AM
To: MRWChambers (b)(6); (b)(7)(C) @cad.uscourts.gov; (b)(6); (b)(7)(C) @creelaw.org
Cc: (b)(6); (b)(7)(C) @dralegal.org (b)(6); (b)(7)(C) @splcenter.org (b)(6) @orrick.com;
(b)(6); (b)(7)(C) @willkie.com (b)(6); (b)(7)(C) usdoj.gov
Subject: RE: Fraihat: canceling 4/12 session

CAUTION - EXTERNAL:

Judge Wilner and counsel,

Defendants confirm that we are in receipt of Plaintiffs’ latest proposal. ICE is reviewing and preparing a written response, including exploring what responses can be provided soon rather than later. Along these lines, ICE proposes meeting again in person the week of May 16, although I note out the outset that I have conflicts on 5/19 and 5/20.

Sincerely,

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)
Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616 (b)(6); (b)(7)(C)
Of course. I appreciate the consideration of all concerned to remain efficient and productive. Order will go out tomorrow.

Dear Judge Wilner,

I am writing to ask that we cancel the mediation session currently scheduled for Apr. 12, 2022 at 8 am PST. We have conferred with the Defendants, who agree that it would likely not be productive to meet on that date without having received and reviewed Plaintiffs’ most recent proposals, which are currently being finalized and reviewed by our clients and experts, and which Defendants understand they most likely will not receive until the end of next week. We are also currently conferring with Defendants to determine new proposed dates for a mediation session that would give them enough time to review and will convey those to Your Honor as quickly as we can.

Thanks

(she/her/ella)
Director, Immigration Detention Accountability Project
Civil Rights Education and Enforcement Center (CREEC)
(b)(5)
(b)(6); (b)(7)(C); (b)(5)
From: (b)(6), (b)(7)(C)
Sent: Wed, 4 May 2022 18:24:52 +0000
To: (b)(6), (b)(7)(C)
Cc: (b)(6), (b)(7)(C)

Lyne-Robert

Subject: RE: FOR SES APPROVAL: 22-01471- RETASK- U.S. Senator Martin Heinrich and 3 Members of Congress Write S1 re CoreCivic's Management of the Torrance County Detention Facility

Cleared.

Chief Counsel
OPLA New York City
U.S. Immigration and Customs Enforcement
26 Federal Plaza (b)(6), (b)(7)(C)
New York, NY 10278
(212) 436-(b)(6) via SECTOR

"With honor and integrity, we will safeguard the American people, our homeland, and our values."

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From: (b)(6), (b)(7)(C) (b)(6), (b)(7)(C) @ice.dhs.gov>
Sent: Wednesday, May 4, 2022 2:01 PM
To: (b)(6), (b)(7)(C) (b)(6), (b)(7)(C) @ice.dhs.gov; (b)(6), (b)(7)(C) @ice.dhs.gov; (b)(6), (b)(7)(C) @ice.dhs.gov; (b)(6), (b)(7)(C) @ice.dhs.gov; (b)(6), (b)(7)(C) @ice.dhs.gov; (b)(6), (b)(7)(C) @ice.dhs.gov; (b)(6), (b)(7)(C) @ice.dhs.gov; (b)(6), (b)(7)(C) @ice.dhs.gov; (b)(6), (b)(7)(C) @ice.dhs.gov; (b)(6), (b)(7)(C) @ice.dhs.gov; (b)(6), (b)(7)(C) @ice.dhs.gov; (b)(6), (b)(7)(C) @ice.dhs.gov; (b)(6), (b)(7)(C) @ice.dhs.gov;
Cc: (b)(6), (b)(7)(C) (b)(6), (b)(7)(C) @ice.dhs.gov; (b)(6), (b)(7)(C) @ice.dhs.gov; (b)(6), (b)(7)(C) @ice.dhs.gov; (b)(6), (b)(7)(C) @ice.dhs.gov; (b)(6), (b)(7)(C) @ice.dhs.gov; (b)(6), (b)(7)(C) @ice.dhs.gov; (b)(6), (b)(7)(C) @ice.dhs.gov; (b)(6), (b)(7)(C) @ice.dhs.gov; (b)(6), (b)(7)(C) @ice.dhs.gov; (b)(6), (b)(7)(C) @ice.dhs.gov

Subject: FOR SES APPROVAL: 22-01471- RETASK- U.S. Senator Martin Heinrich and 3 Members of Congress Write S1 re CoreCivic's Management of the Torrance County Detention Facility
Good afternoon SES Team,

This task is due as soon as practicable and SES approval is required.

Background
OPLA has been asked to review the attached response to Senator Martin Heinrich and 3 Members of Congress who wrote to ICE regarding CoreCivic's management of the Torrance County Detention Facility. Please note, the accompanying incoming letter (.pdf) from Senator Heinrich is for reference only.
Respectfully,

Acting Chief / Associate Legal Advisor
Executive Communications Unit
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
500 12th Street SW, Office_U.S. Immigration and Customs Enforcement
Washington, D.C. 20536
Office: (202) 732_U.S. Immigration and Customs Enforcement
Cell: (202) 577

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From: ICATT.Alert_U.S. Immigration and Customs Enforcement
Sent: Monday, May 2, 2022 7:26 AM
To: OPLA Tasking_U.S. Immigration and Customs Enforcement
Subject: Review and Comment -22-01471- U.S. Senator Martin Heinrich and 3 Members of Congress
Detention Contracts and Intergovernmental Agreements
Fiscal Years 2017, 2018 and 2019
To: ice.dhs.gov; hq.dhs.gov
Cc: ice.dhs.gov; usdoj.gov

Subject: RE: [EXTERNAL] Freihat

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Following up on this please.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From:
Sent: Thursday, March 24, 2022 2:28 PM
To:
Cc:

@ice.dhs.gov; hq.dhs.gov; usdoj.gov

@ice.dhs.gov; usdoj.gov

@ice.dhs.gov

@HQ.DHS.GOV; ice.dhs.gov; usdoj.gov; Davis, Mike P

@ice.dhs.gov; Padilla, Kenneth
Thank you.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From: ice.dhs.gov
Sent: Thursday, March 24, 2022 2:19 PM
To: hq.dhs.gov; ice.dhs.gov; padilla, kenneth
Cc: ice.dhs.gov; usdoj.gov

Subject: RE: [EXTERNAL] Faihat
Kind regards,

(b)(5)

(b)(5), (b)(7)(C)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 25(B)(6)

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From: (b)(6), (b)(7)(C)@usdoj.gov
Sent: Thursday, March 24, 2022 10:52 AM
To: (b)(6), (b)(7)(C)@ice.dhs.gov; (b)(6), (b)(7)(C)@usdoj.gov;
     (b)(6), (b)(7)(C)@hq.dhs.gov;
Cc: (b)(6), (b)(7)(C)@ice.dhs.gov; (b)(6), (b)(7)(C)@usdoj.gov;
     (b)(6), (b)(7)(C)@ice.dhs.gov; (b)(6), (b)(7)(C)@hq.dhs.gov;
     (b)(6), (b)(7)(C)@ice.dhs.gov; (b)(6), (b)(7)(C)@usdoj.gov;
Subject: RE: [EXTERNAL] Fraihat

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Thanks,

Several responses here unfortunately require further follow-up, and I’m concerned about the time that is taking to turn things around here.

Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-
ICE accepts the suggested edits in blue from OIL. In addition, please see ICE’s responses to OIL’s questions in green below.

Kind regards,

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From: @usdoj.gov
Sent: Monday, March 21, 2022 6:42 PM
To: @ice.dhs.gov; @usdoj.gov; @hq.dhs.gov;
Cc: @ice.dhs.gov; @usdoj.gov; @hq.dhs.gov;
Subject: RE: [EXTERNAL] Fraihat

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Thanks you and all,

OIL’s proposed additions are below in blue, and question are in blue and highlighted. Nothing too major here – we’d like to turn this back to Plaintiffs by tomorrow. Please let us know if that will be possible.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From: @ice.dhs.gov
Sent: Friday, March 18, 2022 5:56 PM
To: @usdoj.gov; @usdoj.gov;
Subject: RE: [EXTERNAL] Fraihat

Please see below for ICE’s responses in red. Please note that two requests below need additional time for ICE to finalize a response.
(b)(6), (b)(7)(C)
Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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From: usdoj.gov>
Sent: Monday, March 14, 2022 9:19 AM
To: usdoj.gov>
Cc: @hq.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; Padilla, Kenneth @ice.dhs.gov; @hq.dhs.gov; @ice.dhs.gov; @ice.dhs.gov

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Subject: RE: [EXTERNAL] Fraihat

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Good morning.

In addition to opposing counsel’s settlement related questions for tomorrow, they have also sent along a series of questions/concerns regarding PI compliance that I have attached here. Please let us know if there is anything in here that ICE would like to discuss initially, but we would otherwise request consolidated responses by COB Friday, or a heads up by COB Thursday if responses are taking longer to assemble and draft.

Thank you,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-6066

From: [Email Address]
Sent: Wednesday, March 09, 2022 2:42 PM
To: [Email Address]
Cc: [Email Address]

From: [Email Address]
Sent: Wednesday, March 09, 2022 2:42 PM
To: [Email Address]
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Sent: Wednesday, March 09, 2022 2:42 PM
To: [Email Address]
Cc: [Email Address]

From: [Email Address]
Sent: Wednesday, March 09, 2022 2:42 PM
To: [Email Address]
Cc: [Email Address]
Please find Plaintiffs’ follow-up questions attached. Please have consolidated and reviewed responses back to OIL by COB Tuesday 3/15, so that we can review and get back to Plaintiffs by COB on Wednesday 3/16.

Please also respond to let us know where DHS and ICE are on Plaintiffs’ request regarding an extension of their en banc deadline so that we can get back to them with something today, even if not a final decision.

Thank you.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From (b)(6), (b)(7)(C)
Sent: Wednesday, March 09, 2022 7:37 AM
To (b)(6), (b)(7)(C)
Cc (b)(6), (b)(7)(C)

Good morning, ICE –
We scheduled the next mediation session for April 12, 2022, 11am ET, but Judge Wilner was clear that he did not want to gather everyone again if the parties were not ready to make substantive progress by that date.

Lastly, a reminder that we need DHS and ICE positions on Plaintiffs’ extension request on the en banc rehearing deadline.

Thank you,

Senior Litigation Counsel
U.S. Department of Justice, Civil Division
Office of Immigration Litigation – District Court Section
P.O. Box 868 | Ben Franklin Station | Washington, DC 20044
Direct: (202) 536-5000 | Fax: (202) 305-7000 | Email

From: @usdoj.gov
Sent: March 2, 2022 4:58 PM
To: @ice.dhs.gov, @hq.dhs.gov;
Cc: @hq.dhs.gov;

Subject: RE: [EXTERNAL] Fraihat

Yes, 60 days.
Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: [b](6) (b)(7)(C) @ice.dhs.gov
Sent: Wednesday, March 02, 2022 4:57 PM
To: [b](6) (b)(7)(C) @usdoj.gov; [b](6) (b)(7)(C) @hq.dhs.gov;
[b](6) (b)(7)(C) @hq.dhs.gov;

Cc: [b](6) (b)(7)(C) @ice.dhs.gov; [b](6) (b)(7)(C) @ice.dhs.gov;
[b](6) (b)(7)(C) @usdoj.gov;

[b](6) (b)(7)(C) @usdoj.gov;
[b](6) (b)(7)(C) @ice.dhs.gov;
[b](6) (b)(7)(C) @ice.dhs.gov;
[b](6) (b)(7)(C) @ice.dhs.gov;
[b](6) (b)(7)(C) @ice.dhs.gov;
[b](6) (b)(7)(C) @ice.dhs.gov;
[b](6) (b)(7)(C) @ice.dhs.gov;
[b](6) (b)(7)(C) @ice.dhs.gov;
[b](6) (b)(7)(C) @ice.dhs.gov;
[b](6) (b)(7)(C) @ice.dhs.gov;
[b](6) (b)(7)(C) @ice.dhs.gov;
[b](6) (b)(7)(C) @ice.dhs.gov;
[b](6) (b)(7)(C) @ice.dhs.gov;
[b](6) (b)(7)(C) @ice.dhs.gov;
[b](6) (b)(7)(C) @ice.dhs.gov;
[b](6) (b)(7)(C) @ice.dhs.gov;
[b](6) (b)(7)(C) @ice.dhs.gov;
[b](6) (b)(7)(C) @ice.dhs.gov;
[b](6) (b)(7)(C) @ice.dhs.gov;
[b](6) (b)(7)(C) @ice.dhs.gov;
[b](6) (b)(7)(C) @ice.dhs.gov;
[b](6) (b)(7)(C) @ice.dhs.gov;

Subject: RE: [EXTERNAL] Fraihat

Thank you, I think that would be helpful.

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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document is for INTERNAL GOVERNMENT USE ONLY and may be exempt from disclosure under the Freedom of Information Act, 5 USC §552(b)(5), (b)(7).

From: @usdoj.gov
Sent: Wednesday, March 2, 2022 4:55 PM
To: @ice.dhs.gov; @hq.dhs.gov;
Cc: @usdoj.gov; @ice.dhs.gov; @hq.dhs.gov;

Subject: RE: [EXTERNAL] Fraihat

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I can ask, but I’d imagine another 60 days.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 614-...

From: @ice.dhs.gov
Sent: Wednesday, March 02, 2022 4:52 PM
To: @usdoj.gov; @hq.dhs.gov;
Cc: @usdoj.gov; @ice.dhs.gov; @hq.dhs.gov;

From: @usdoj.gov
To: @ice.dhs.gov; @hq.dhs.gov;
Cc: @usdoj.gov; @ice.dhs.gov; @hq.dhs.gov;

From: @ice.dhs.gov
To: @usdoj.gov; @ice.dhs.gov; @hq.dhs.gov;
Cc: @usdoj.gov; @ice.dhs.gov; @hq.dhs.gov;

From: @ice.dhs.gov
To: @usdoj.gov; @ice.dhs.gov; @hq.dhs.gov;
Cc: @usdoj.gov; @ice.dhs.gov; @hq.dhs.gov;

2022-ICLI-00045 4361
What is the timeframe Plaintiffs are requesting for another extension? I do not see the draft motion attached.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 25

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Subject: RE: [EXTERNAL] Fraihat

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Please also see below, opposing counsel’s request for a further continuance of their deadline to seek en banc consideration of the Ninth Circuit’s decision. I’d like to be able to get back to them before the end of the week.

If there is concern about the pace of mediation, I would propose that we could agree to one more extension, but that we would need to see progress in mediation before agreeing to any further extensions?

Thanks,

I hope you are doing well. The current deadline for filing a petition for rehearing en banc is April 5, so we would like to get another consent motion for an extension on file next week to allow the mediation efforts to keep proceeding. It seems like Judge Wilner has been helpful and both sides feel that mediation has been productive so far. Please let us know if the attached motion is acceptable to ICE.

Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616 -

From: [b](8); [b](7)(C)
Sent: Wednesday, March 02, 2022 12:59 PM
Many thanks

Deputy Director
From: [b](202) 616-[b](769)

Sent: Friday, February 25, 2022 12:35 PM

To: [b] hq.dhs.gov; [b] ice.dhs.gov; [b] usdoj.gov

Cc: [b] hq.dhs.gov; [b] ice.dhs.gov; [b] usdoj.gov

Subject: RE: [EXTERNAL] Fraihat

Thanks everyone.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-[b](769)

From: [b](202) 616-[b](769)

Sent: Friday, February 25, 2022 11:48 AM

To: [b] hq.dhs.gov; [b] usdoj.gov

Cc: [b] ice.dhs.gov; [b] usdoj.gov

Subject: RE: [EXTERNAL] Fraihat
Subject: RE: [EXTERNAL] Fraihat

please see a few edits in the attached.

Best,

Assistant General Counsel for Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(202) 740

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From: @hq.dhs.gov
Sent: Thursday, February 24, 2022 9:50 PM
To: @ice.dhs.gov; @usdoj.gov; @ice.dhs.gov
Cc: @usdoj.gov; @hq.dhs.gov

Subject: RE: [EXTERNAL] Fraihat

2022-ICLI-00045 4366
Not sure if my earlier email went through. We are finalizing our input. You should hear back from [b](6), [b](7)(C) in my absence.

Kind regards,

[b](6), [b](7)(C)

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(o) (202) 282-[b](6) (m) (202) 853-[b](6)
[b](6), [b](7)(C) [a]hq.dhs.gov

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From:[b](6), [b](7)(C) @usdoj.gov>
Sent: Thursday, February 24, 2022 9:10 PM
To:[b](6), [b](7)(C) @hq.dhs.gov>
Cc:[b](6), [b](7)(C) @ice.dhs.gov;
[b](6), [b](7)(C) @ice.dhs.gov;
[b](6), [b](7)(C) @ice.dhs.gov;
[b](6), [b](7)(C) @ice.dhs.gov;
[b](6), [b](7)(C) @ice.dhs.gov;
[b](6), [b](7)(C) @ice.dhs.gov;
[b](6), [b](7)(C) @HQ.DHS.GOV;
[b](6), [b](7)(C) @ice.dhs.gov;
[b](6), [b](7)(C) @ice.dhs.gov;
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[b](6), [b](7)(C) @ice.dhs.gov;
[b](6), [b](7)(C) @ice.dhs.gov;

Subject: Re: [EXTERNAL] Faihat

Anything on this folks? Opposing counsel is checking in on our status so they can move forward with their revised proposal.

Sent from my iPad
On Feb 24, 2022, at 11:18 AM, @usdoj.gov wrote:

Thanks for the call this morning. Please find attached a draft email for opposing counsel that attempts to distill our current positions. I appreciate any comments/edits that can be provided by COB, or let me know if you’ll need longer.

From: Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616...

Sent: Wednesday, February 23, 2022 2:55 PM
To: @usdoj.gov
Cc: @ice.dhs.gov; Padilla, Kenneth
@ice.dhs.gov; Loiacono, Adam V
@ icing.gov; Davis, Mike P

Subject: RE: [EXTERNAL] Fraihat

Thanks! I will coordinate with schedule and link up with ICE to determine a time.

Kind regards,

[Redacted]

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(202) 28...
(202) 85...

@hq.dhs.gov
Thank you. I think a call is still warranted to clear a few of our specific asks up. Can you please propose a time that works tomorrow?

Sent from my iPhone

On Feb 23, 2022, at 11:32 AM [b(6), (b)(7)(C)]@hq.dhs.gov wrote:

Hi [b(8)]

Attached please find consolidated/updated input from DHS + ICE and let us know if there’s any more follow up needed before responding. Thanks for your patience.

Kind regards,
Thanks, and I see that the call was just cancelled. Should we still expect updates today, which we will then need to digest and get back to opposing counsel.

Sent from my iPhone

On Feb 22, 2022, at 9:52 AM [b](6); [b](7)[C] @hq.dhs.gov wrote:
Friends—

Flagging that DHS and ICE are working on revised responses for DOJ’s review and anticipate canceling this call. We will follow up shortly.

Kind regards,

[Redacted]

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(a) (202) 282-8534
(m) (202) 853-8534

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<Fraihat Draft Responses to OIL re Plaintiffs Mediation Follow Ups 2.22.22 (002) (2 23 22 Updated ICE DHS Input).docx>
<Fraihat 2.24 Draft Email to Counsel.docx>
Dear Michael,

U.S. Immigration and Customs Enforcement (ICE) operates a detention center in Torrance County, New Mexico that is notorious for its horrendous and unsafe conditions. Our Immigration Justice Campaign has worked to advocate for the release of people held in the facility.

Now, the spotlight on the Torrance facility has attracted the attention of government watchdogs—and we have stunning news.

The Department of Homeland Security’s Office of Inspector General (OIG) paid a surprise visit to Torrance in February. Based on what they found, the OIG demanded that ICE immediately stop holding people at the facility, “unless and until the facility ensures adequate staffing and appropriate living conditions.”

Specifically, the OIG called out:

- Critical staffing shortages.
- Unsanitary conditions. 53% of all cells at the facility suffered from
plumbing issues.

- Security lapses. There were not enough officers to ensure safe conditions.

- A non-functioning moldy sink and clogged toilet full of human waste observed in vacant cells in an occupied housing unit.

It is extraordinary to see the OIG demand that ICE immediately stop holding people at a detention facility. This speaks to the horrific and extreme conditions that ICE and its contractor CoreCivic have been allowed to get away with for far too long at Torrance.

But the findings themselves are not surprising at all. Cruelty and impunity are a consistent pattern across our immigration detention system.

Yet even faced with this new report from the OIG, the agency denies that there’s a problem at Torrance and is unlikely to comply with the recommendations.

ICE has proven that it’s unable to detain people humanely. It’s past time for ICE to close the Torrance facility and release—not transfer—the people it’s holding there.

Sincerely,

[Redacted]
Policy Director
From: Guzman, Nicole G  
Sent: Tue, 19 Apr 2022 17:35:48 +0000  
To: Loiacono, Adam V  
Subject: FW: Temporary Unified Processing Sites - TCDF / OCPC / PISPC Idea

FYSA

Nicole G. Guzman  
Deputy Principal Legal Advisor for General and Administrative Law  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
U.S. Department of Homeland Security  
407.209.____ (mobile)

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From: [REDACTED]@ice.dhs.gov  
Sent: Monday, April 18, 2022 2:51 PM  
To: Guzman, Nicole G [REDACTED]@ice.dhs.gov  
Subject: FW: Temporary Unified Processing Sites - TCDF / OCPC / PISPC Idea

FYSA

From: [REDACTED]@ice.dhs.gov  
Sent: Monday, April 18, 2022 2:30 PM  
To: [REDACTED]@ice.dhs.gov  
Cc: Klopp, Jacki Becker [REDACTED]@ice.dhs.gov  
Subject: RE: Temporary Unified Processing Sites - TCDF / OCPC / PISPC Idea

[REDACTED]
From: [redacted]@ice.dhs.gov
Sent: Monday, April 18, 2022 1:57 PM
To: [redacted]@ice.dhs.gov
Cc: Klopp, Jacki Becker [redacted]@ice.dhs.gov>; [redacted]@ice.dhs.gov>; [redacted]@ice.dhs.gov
Subject: FW: Temporary Unified Processing Sites - TCDF / OCPC / PISPC Idea

Please let me know what you think.

We can have a separate Teams call with the SMEs to discuss more if desired.

v/r,

Deputy Assistant Director, Fiscal Management Division
Operations and Support
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
(Desk) 202-73 [redacted] (Cell) 202-200 [redacted]
500 12th Street SW, MS 5202
Washington DC 20536

From: [redacted]@ice.dhs.gov
Date: Tuesday, Apr 12, 2022, 5:48 PM
To: [redacted]@ice.dhs.gov
Cc: [redacted]@ice.dhs.gov; [redacted]@ice.dhs.gov; [redacted]@ice.dhs.gov; [redacted]@ice.dhs.gov

2022-ICLI-00045 4375
Subject: FW: Temporary Unified Processing Sites - TCDF / OCPC / PISPC Idea

Please see below information on the Temporary Unified Processing Sites (TUPS) discussed last night.

Looking forward to your questions and concerns.

SITUATION
(b)(6), (b)(7)(C)

Assistant Director (Acting)

Headquarters Field Operations

Enforcement and Removal Operations

U.S. Immigration and Customs Enforcement

Cell: 786-299-
Hi

I’ll have some notes for you tomorrow, but it was mostly [b](6); [b](7); [c] talking about [b](5)

Nicole was on as well.

---

[b](6); [b](7); [c]

Deputy Chief
District Court Litigation Division
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security

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Thanks.

Adam V. Loiacono
Deputy Principal Legal Advisor for Enforcement and Litigation
Hi Adam,

I can take care of it.

Hope little guy feels better.

---

Deputy Chief
District Court Litigation Division
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security

t: 202.736.1234
c: 202.555.1234

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No date has been set yet for the Torrance Stakeholder Meeting.

Adam V. Loiacono
Deputy Principal Legal Advisor for Enforcement and Litigation
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
Phone: 202-500

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We have the internal ICE prep call today, 4/5. Requesting this hold for the week after, this date may yet change.

Please add anyone else needed.

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From: Loiacono, Adam V
Sent: Sun, 3 Apr 2022 18:37:01 -0400
To: [b][6], [b][7][C]
Subject: Accepted: Internal Prep for a Torrance Stakeholder Meeting
From: [Redacted]
Sent: Tue, 5 Apr 2022 14:00:49 +0000
To: [Redacted]
Subject: FW: Internal Prep for a Torrance Stakeholder Meeting

-----Original Appointment-----
From: ice.dhs.gov
Sent: Monday, March 28, 2022 7:47 PM
To: [Redacted]
Cc: [Redacted]
Subject: Internal Prep for a Torrance Stakeholder Meeting

When: Tuesday, April 5, 2022 4:00 PM-4:30 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

At the general engagement on detention facility closure/reduction last Friday, one of the reasons that Torrance did not come up was before that meeting[Redacted] and I made individual calls with the [Redacted]

No date has been set yet for the Torrance Stakeholder Meeting.

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At the general engagement on detention facility closure/reduction last Friday, one of the reasons that Torrance did not come up was before that meeting and I made individual calls with the

No date has been set yet for the Torrance Stakeholder Meeting.

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From: Loiacono, Adam V
Sent: Sun, 3 Apr 2022 22:36:58 +0000
To: [Redacted]
Subject: Accepted: Internal Prep for a Torrance Stakeholder Meeting
Before the Court is Plaintiffs’ motion to enforce the Court’s April 20, 2020 preliminary injunction. ("Motion," Dkt. Nos. 172, 172-1.) The Court held hearings on the matter on Friday, July 17, 2020 at 2:00 p.m. and Wednesday August 5, 2020 at 2:00 p.m. After considering the oral argument of the parties, as well as the papers filed in support of and in opposition to the matter, the Court GRANTS IN PART AND DENIES IN PART the Motion.

I. BACKGROUND

Custody Management Tae Johnson, ICE Health Service Corps ("IHSC") Assistant Director Stewart D. Smith, ERO Operations Support Assistant Director Jacki Becker Klopp, and DHS Senior Official Performing Duties of the Deputy Secretary David P. Pekoske (collectively, "Defendants").

On April 15, 2020, the Court denied Defendants’ motion to sever and dismiss. ("MTD Order," Dkt. No. 126.) On April 20, 2020, the Court granted Plaintiffs’ emergency motion for provisional class certification and motion for preliminary injunction. ("PI Order," Dkt. No. 132 (providing further background on Plaintiffs, Defendants, and the history of this action); “Class Certification Order,” Dkt. No. 133.) The Court certified two subclasses (collectively, “Subclasses”) under Fed. R. Civ. P. 23(b)(2). (Class Certification Order.) The Court also issued a preliminary injunction ("Preliminary Injunction"). (PI Order at 38-39.) On May 15, 2020, the Court granted Plaintiffs’ ex parte application for issuance of notice to Subclass members of the preliminary injunction order and to obtain information and documents from Defendants necessary to monitor compliance with that order. ("Notice and Discovery Order," Dkt. No. 150.) Defendants appealed the Court’s PI Order, and the appeal is pending before the Ninth Circuit. (Dkt. Nos. 161, 164.)


Defendants opposed the Motion on July 8, 2020. ("Opposition," Dkt. No. 204.) In support of the Opposition, Defendants include twenty-three declarations. (“Vick Declaration," Dkt. No. 204-1 (attaching further declarations as Exhibits 1 to 23).) Defendants also include a demonstrative chart, which lists assertions by Plaintiffs’ declarants next to rebuttals from
Defendants’ declarants. (“Rebuttal Chart,” Dkt. No. 204-25.) On July 13, 2020, Defendants filed a document referenced in their declarations but that they neglected to attach and neglected to disclose to Plaintiffs in earlier document productions. (Dkt. No. 205.)


1 To the extent that the Court relies on the objected-to evidence, the objections are overruled. Defendants’ “demonstrative chart” with rebuttal declarations is not particularly helpful or persuasive. Although it reveals a few potential inconsistencies, the chart often contrasts detainee and administrator characterizations of fact that are not necessarily incommensurable, or that are not time bound. Some objections even seem helpful to Plaintiffs. (See, e.g., Pitman Decl. ¶¶ 36, 38, (asserting “[t]here has been no need to increase medical staffing since the onset of COVID-19,” and conceding the last time Subclass member Alex Hernandez had a temperature check would have been several months ago, in March 2020).) See also ICE Detainee Statistics, https://www.ice.gov/coronavirus (noting more than a dozen detainees were under isolation or monitoring at Pitman’s facility, Etowah).

The Court accords significant weight to Plaintiffs’ declarations for four reasons. First, Defendants are free to offer their own expert opinions but have declined to do so. Second, Plaintiffs offer diverse views, including from detainees themselves, legal service organizations, attorneys who speak to detainees regularly, and area experts (a doctor with corrections experience, an emergency room physician, an epidemiologist, and a professor and former officer and head of civil rights at DHS). Third, Defendants’ declarations contain significant flaws. Defendants submit the views of their own supervisory officials and facility directors, as well as an IHSC health official. These officials often describe conditions in conclusory terms, most often at facilities with comparably low numbers of COVID-19 cases. A lead declarant provided incorrect statistics on the rate of testing. (Opp’n at 1 (“Defendant Tae Johnson falsely claims that ICE has tested “nearly 46% of the ICE detained population”) (noting that in fact less than 13% have been tested); see also Venters Decl. ¶ 8 (noting that in Texas, Ohio, Tennessee, and at some BOP facilities, mass testing was initiated as of April and May).) Fourth, Defendants’ supervisors’ own views of the extent of systemwide compliance are only as reliable as their instruments for measuring facts on the ground. As discussed below, Plaintiffs raise serious questions about the adequacy of Defendants’ surveys and other PRR monitoring mechanisms.
II. LEGAL STANDARD

Once a notice of appeal is filed, the district court is divested of jurisdiction over the matters being appealed. Griggs v. Provident Consumer Discount Co., 459 U.S. 56, 58 (1982) (per curiam). This rule promotes judicial economy and avoids the confusion that would ensue if the same issues were before two courts simultaneously. Masalosalo v. Stonewall Ins. Co., 718 F.2d 955, 956 (9th Cir. 1983). An exception is that the district court “retains jurisdiction during the pendency of an appeal to act to preserve the status quo.” Nat. Res. Def. Council, Inc. v. Sw. Marine Inc., 242 F.3d 1163, 1166 (9th Cir. 2001).

This exception is codified in the Federal Rules of Civil Procedure, which allow a district court to “suspend, modify, restore, or grant an injunction on terms for bond or other terms that secure the opposing party’s rights.” Fed. R. Civ. P. 62(c), (d) (“Rule 62”); Nat. Res. Def. Council, 242 F.3d at 1166. Rule 62 “does not restore jurisdiction to the district court to adjudicate anew the merits of the case,” McClatchy Newspapers v. Cent. Valley Typographical Union No. 46, Int’l Typographical Union, 686 F.2d 731, 734 (9th Cir. 1982), and district court action taken pursuant to Rule 62 “may not materially alter the status of the case on appeal.” Nat. Res. Def. Council, 242 F.3d at 1166 (citation omitted). Rule 62 does authorize a district court to continue supervising compliance with the injunction pending appeal and to modify the injunction consistent with its original purposes. A&M Records, Inc. v. Napster, Inc., 284 F.3d 1091, 1099 (9th Cir. 2002); Meinhold v. United States Dep’t of Def., 34 F.3d 1469, 1480 n.14 (9th Cir. 1994) (holding modification of preliminary injunction during pendency of appeal was proper to clarify the injunction and supervise compliance, in light of new facts).

III. DISCUSSION

The Court begins by summarizing relevant events and policy documents since the Preliminary Injunction. The Court then examines the evidence of noncompliance and whether there is a need to clarify or modify any of the Preliminary Injunction’s terms. The Court finds several areas where clarification is warranted. Finally the Court determines that more active monitoring of Defendants’ compliance is needed.

A. Developments Since the Court’s April 20, 2020 Preliminary Injunction

1. COVID-19 Pandemic

Outbreaks of COVID-19 continue and are “unlikely to be controlled anywhere over the long term in this country.” (Gonsalves Decl. ¶ 7.) Even where the number of new COVID-19 cases has declined, epidemiologists warn of further waves this fall and even in coming years. (Id., ¶¶ 7, 9, 13, 16, 31 (noting that deaths tend to lag over five weeks behind a spike in confirmed cases).) Experts continue to advise that detention centers are closed environments that increase the risk of COVID-19 outbreaks and are institutional amplifiers of the virus, not unlike factories or nursing homes. (Id. ¶¶ 18-22.) Detention centers with lax social distancing
or other COVID-19 prevention measures continue to pose a grave threat of harm to individuals residing and working in them, as well as to the community as a whole. On July 22, 2020, the CDC updated its interim guidance on managing COVID-19 in detention facilities. (July 22 CDC Guidance.) The document remarks that the risk of COVID-19 outbreaks is especially acute at detention facilities with “high turnover, admitting new entrants daily who may have been exposed . . . in the surrounding community” and in networks of facilities with “daily staff movements [and] transfer . . . between facilities and systems.” (Id. at 1-2.)

Significant numbers of ICE detainees have been infected with COVID-19. More than 700 ICE detainees currently in custody have tested positive and are under active isolation or monitoring for the disease.\(^2\) This figure does not include the many detainees who tested positive but have been returned to general population, deported, or released. The number of ICE detainees that cycle through facilities each year is far greater than the number detained at any given moment.

2. Revised Policy Documents from Defendants and the CDC

The Preliminary Injunction requires Defendants to “promptly” issue a “Performance Standard” or a supplement to their April 10, 2020 Pandemic Response Requirements (“PRR I”). (See PI Order at 8 (referencing the PRR I, Dkt. No. 124-1)). The Performance Standard must define the minimum acceptable detention conditions for detainees with defined Risk Factors, (Id. at 38). On June 23, 2020, Defendants issued revised pandemic response requirements.\(^3\) (“PRR II,” Fox Decl., Ex. 14.)

The Preliminary Injunction also requires Defendants to “monitor and enforce facility-wide compliance” with the PRR and Performance Standard/PRR II. (PI Order at 38-39.) Defendants purport to be monitoring compliance with COVID-19 requirements in part by using detention facility questionnaires or checklists (“Facility Checklists”). (See Fox Decl. ¶ 3, Exs. 10-12 (noting Defendants produced about 105 such checklists and attaching examples, which were completed by detention facilities in April 2020.).) The Facility Checklists rely on detention facility administrators to self-report conditions of confinement and degree of COVID-19 preparedness. (Id.)

Another monitoring tool is Defendants’ “COVID-19 Checklist for All ICE ERO Transfers, Removals, and Releases,” which must be completed for any detainee who will be transferred, removed, or released. (“Individual Checklist,” Dkt. No. 205-1; Vick Decl., Ex. 1 ¶ 8.) The Individual Checklist includes a space for the noncitizen and the detention staff to sign. (Id.) The form has been available since May 5, 2020. (Vicks Decl., Ex. 17 ¶ 8.) According to the Individual Checklist, detainees should not be transferred or deported if they are in medical isolation,

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experiencing COVID-19 symptoms, awaiting test results, or are cohorted due to COVID-19 exposure. (Individual Checklist.)

The Preliminary Injunction also directs Defendants to mandate—instead of merely suggest—that Field Office Directors (“FODs”) conduct custody determinations pursuant to the “Docket Review Guidance.” (PI Order at 38-39; Dkt. No. 121-4 (attaching detained docket review guidance dated April 4, 2020).) On April 26, 2020, Defendants issued an update requiring, rather than suggesting, detained docket review of Subclass Members pursuant to the Preliminary Injunction. (“Docket Review Guidance II,” Fox Decl., Ex. 19.) The Docket Review Guidance II also updates the risk factors triggering custody review. (Id.)

The Centers for Disease Control (“CDC”) has continued to update its Interim Guidance periodically. The latest Interim Guidance provided to the Court is dated July 22, 2020. (July 22 CDC Guidance.) On July 28, 2020, Defendants issued a third iteration of the PRR. (PRR III.) On September 4, 2020, Defendants issued a fourth iteration of the PRR. (PRR IV.)

3. June 18, 2020 OIG Report

On June 18, 2020, the DHS Office of the Inspector General (“OIG”) issued a report entitled “Early Experiences with COVID-19 at ICE Detention Facilities.” (“OIG Report,” Fox Decl., Ex. 17.)4 The Report noted the number of detainees who have tested positive for COVID-19 has risen 496% in just four weeks, from April 20 to May 26, 2020. (Id.) The OIG report surveyed 188 ICE facilities from April 8 to 20, 2020,5 and noted facilities were concerned with their “inability to practice social distancing . . . and to isolate or quarantine individuals who may be infected with COVID-19.” (OIG Report at 6.) 29% of the surveyed facilities did not have negative pressure rooms to isolate airborne infections, and 33% had only one or two such rooms. (Id.) Facilities also expressed concerns with the availability of personal protective equipment (“PPE”), in the event COVID-19 continued to spread. (Id. at 11.)

4. Subclass Members and Detention Statistics

The Notice and Discovery Order requires Defendants to provide data on the Subclasses. A June 19, 2020 “Current Detainees” spreadsheet identifies 5,736 Subclass members. (Fox


5 It is important to note facilities were surveyed before the issuance of the PI Order. Nevertheless, the responses are informative and the Report includes more recent statistics provided by ICE. The responses also demonstrate the importance of mandatory guidelines and a coordinated response from Defendants. For example, the OIG report noted 27% of non-dedicated facilities surveyed had not received any guidance from ICE regarding COVID-19. (OIG Report at 14 (also noting that at that time, only certain facilities were required to comply).)
Decl. ¶ 10.) Of these, 3,827 (67%) are detained. (Id.) Presumably, the remaining 1,909 non-detained individuals on this list have been “released.” Defendants mark a Subclass member as “released” for several reasons. For example, three “released” individuals died, seventy-four were granted relief by an immigration judge, and 769 have been deported. It would appear, then, that only 1,063 individuals have been released pursuant to either the PI Order or other discretionary procedures such as bond, conditional parole, or “arriving alien” parole. (see 8 U.S.C. § 1226(a) (bond and conditional parole); 8 U.S.C. § 1182(d)(5) (parole for “arriving aliens”)). Although a few have obtained relief, most have not. 2,735 (70%) of the detained Subclass members are not subject to mandatory detention, yet remain detained. (Id. ¶ 11.)

Plaintiffs also provide transfer statistics. In a two-week period, 140 detained Subclass members were transferred from one facility to another (over forty detention facilities), and remained in custody after the transfer. (Id. ¶¶ 15-16.) This figure does not include Subclass members who were transferred through one or more facilities before being deported.

Defendants continue to arrest, detain, and deport large numbers of noncitizens, including individuals with Risk Factors. (Id.; King Decl. ¶ 19.) Over a four-month period—March 1, 2020 through June 27, 2020—ICE removed over 41,000 individuals from the United States. (Vick Decl., Ex. ¶ 11.) Over the same period, the detained population decreased from 38,596 to 23,185. (Id.) As of July 4, 2020, Defendants detained 22,579 individuals, of whom 7,956 were never convicted of a crime and have no pending criminal charges.7 However, Plaintiffs estimate that 82,000 individuals have been in detention since March 1, 2020. (Reply at 2.) Of these, Defendants tested fewer than 13%. (Reply at 2.)

B. Necessary Clarifications of the Preliminary Injunction in Light of Noncompliance

The pandemic is accelerating, and Defendants’ spotty compliance to date necessitates clarification of the Preliminary Injunction’s terms. In particular, the Court is dismayed that more than five months after the issuance of the Preliminary Injunction, Defendants have not issued a Performance Standard to address the substantial risk of death to Subclass members during the pandemic. Defendants’ weak monitoring of facility-wide compliance with the Performance Standard is also perplexing. Current monitoring efforts rely on a meager survey that allows facilities to self-report their level of compliance. Defendants have made strides

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6 The Court acknowledges Defendants’ progress in reducing the average daily population of detainees across facilities. However, these daily snapshots do not account for the rapid turnover in detainee population. In the span of a year, far more than are in custody on any given day will ultimately be detained and cycled through Defendants’ network of facilities, on path to eventual deportation or release. And as the parties’ supplements illustrate, (Dkt. Nos. 223, 224), even facilities at half capacity and that have attempted to follow ICE’s guidelines up to this point can suffer dangerous outbreaks and death.

identifying Subclass members, but the Court is gravely concerned that Fraihat custody decisions are a disorganized patchwork of non-responses or perfunctory denials. The Court is especially distressed that about 70% of the detained Subclass members are not subject to mandatory detention yet have not benefited from the Docket Review Guidance, which instructs that the presence of a risk factor should be a significant discretionary factor in favor of release.

These results fall far short of compliance with the Preliminary Injunction. To ensure the twin goals of compliance and not disturbing the appeal, the Court modifies and clarifies the Preliminary Injunction only as necessary, and in keeping with the original purposes of the PI Order.

1. “Defendants shall promptly issue a performance standard . . . defining the minimum acceptable detention conditions for detainees with Risk factors . . . to reduce their risk of COVID-19 infection . . .”

More than five months into this Court’s Preliminary Injunction, Defendants have yet to issue a performance standard that unequivocally sets the minimum acceptable conditions of confinement for Subclass members across ICE facilities. Although the PRR II, III, and IV include slight improvements for all detainees, they do not substantially comply with the Preliminary Injunction, which focused on the plight of the elderly and medically vulnerable. (See PRR II at 3-
4 (chart with summary of changes, none of which provide specific protections to Subclass members); PRR III at 3-4 (same); PRR IV at 3 (same).) For example, the PRR IV merely state that transfer of ICE detainees should be limited “where possible,”8 do not provide clear-cut guidance for acceptable quarantine and isolation of Subclass members, and do not expand testing for the group. The PRR III and IV alternately muddle, alter, or fail to highlight significant changes in the CDC’s Interim Guidance since late March 2020.

i. Standards Protecting Subclass Members

Defendants’ existing detention standards specifically addressing Subclass member detention conditions are either exceedingly vague or hard to find. The first relevant standard is buried in policy documents as follows. First, the PRR IV state all ICE facilities “must . . . comply with the CDC’s Interim Guidance . . . (Attachment F).” (PRR IV at 7, 9 (incorporating CDC Guidance for both dedicated and non-dedicated facilities).) (Id. at 27.) The July 22 CDC Guidance, once located, provides the following advice with respect to detainees at increased risk for severe illness from COVID-19:

8 Prior iterations of the PRR only discussed transfers of “detained non-ICE populations” but said nothing about ICE detainees, let alone Subclass members. (PRR I at 13; PRR II at 19; PRR III at 20.) Although the PRR III summary of changes states transfers of both non-ICE and ICE populations have been “suspend[ed],” with six exceptions, (PRR III at 4), neither the PRR III nor the PRR IV main text appears to include that requirement. Rather, PRR IV repeats previous PRR III, II and I language: “Where possible, limit transfers. . . .” (Id., at 19.)
If cohorting close contacts is absolutely necessary, be especially mindful of those who are at increased risk for severe illness from COVID-19. Ideally, they should not be cohorted with other quarantined individuals. If cohorting is unavoidable, make all possible accommodations to reduce exposure risk for the increased-risk individuals. (For example, intensify social distancing strategies for increased-risk individuals.)

(July 22 CDC Guidance at 19.) This advice is located in the section on quarantining close contacts. Only the most assiduous reader would locate this standard and also know how to apply it. The standard alone does not comply with the PI Order, because it only addresses one issue: how to quarantine individuals who have had “close contact” with a COVID-19 case, a technical term that depends on duration and type of exposure. The protection ultimately afforded Subclass members is limited to one area, and wobbles: the facility “must comply” with “guidance” that states increased-risk individuals should “ideally” not be cohorted during close-contact quarantines.

The second standard protecting Subclass members is located twenty-one pages into the PRR IV, subsumed under a bullet point on “suspected or confirmed cases of COVID-19 cases.” Defendants direct:

In the event that a facility requires more isolation beds for detainees, ICE must be promptly notified so that transfers to other facilities, transfers to hospitals, or releases can be coordinated immediately. Until such time as the transfer or release is arranged, the facility must be especially mindful of cases that are at higher risk of severe illness from COVID-19. Ideally, symptomatic detainees should not be isolated with other individuals. If isolating of symptomatic COVID-positive detainees as a group is unavoidable, make all possible accommodations until transfer occurs to prevent transmission of other infectious diseases to the higher-risk individual (e.g., allocate more space for a higher-risk individual within a shared isolation room).

(PRR IV at 21-22.) The direction is confusing. Whereas the CDC Guidance discusses at-risk detainees in the context of quarantining close contacts, the PRR IV uproots that language for use in a different context: cohorting symptomatic COVID-19 positive detainees. Second, the PRR IV excerpt does not contemplate accommodations for Subclass members until conditions at a facility are so dire that the facility requires more isolation beds. The PRR IV countenances placement of Subclass members with other symptomatic, COVID-19 positive detainees, then advises the facility give Subclass members “more space” to prevent transmission of (unspecified) “other infectious diseases.” Presumably, at this point, Subclass members have already been infected with COVID-19. A minimally adequate Performance Standard would include preventative
measures, and would not begin to offer accommodations only after elderly and medically vulnerable individuals are sick or dying from COVID-19.

The Court could not locate other Subclass-specific guidance in Defendants’ PRR IV that would assist detention facility operators in protecting the most medically vulnerable detainees. Under each PRR iteration, a 70-year-old with multiple Risk Factors will be held in essentially the same conditions as a 20-year-old, “ideally” with further accommodations once they become infected or have already been in close contact with COVID-19. Plaintiffs identify a long list of additional PRR lacunae, which illustrate Defendants’ failure to issue a comprehensive Performance Standard for the Subclasses. (See generally Venters Decl.)

Defendants argue these gripes are outside the scope of the Preliminary Injunction. (Opp’n at 11-15 (“[Plaintiffs’] wish list . . . does not establish Defendants’ noncompliance with the PI Order.”).) The Court disagrees. The failure to provide a concrete and comprehensive protocol specifically addressed to Subclass members does establish noncompliance. Although the Preliminary Injunction did not list each area to be addressed in the Performance Standard, a compliant Standard would mitigate risk by addressing these “wish list” issues.

ii. Necessary Clarifications of the Preliminary Injunction

“[T]he nature of the violation determines the scope of the remedy.” Swann v. Charlotte-Mecklenburg Bd. of Ed., 402 U.S. 1, 16 (1971). Here, the nature of the violation is a failure to adopt sufficiently comprehensive protocols to protect Subclass members. Plaintiffs’ proposed areas for clarification are minor and would “effectuate[] the underlying purposes of [the Preliminary Injunction’s] original requirements.” Nat. Res. Def. Council, 242 F.3d at 1163. Accordingly, the Court clarifies the Preliminary Injunction Performance Standard requirements and ORDERS as follows:

- Defendants shall issue a comprehensive Performance Standard directed to the Subclasses within twenty days.
- Defendants shall mandate more widespread and regular testing of the Subclasses, consistent with CDC Guidelines and above the level provided by the BOP and state prisons.
- Defendants shall develop minimum care and hospitalization protocols for Subclass Members who test positive.
- Defendants shall mandate that medical isolation and quarantine are distinct from solitary, segregated, or punitive housing, that extended lockdowns as a means of COVID-19 prevention are not allowed, and that access to diversion (books, television, recreation) and to telephones must be maintained to the fullest extent possible.
- Defendants shall mandate that safe cleaning products be utilized in safe quantities and in the manner intended for those products.\(^9\) Defendants shall promptly investigate and redress reports of adverse reactions to harsh cleaning products or chemical sprays.

- Defendants shall provide more protective, and more concrete, transfer protocols to protect the Subclasses, including a suspension of transfers with a narrow and well-defined list of exceptions consistent with CDC Guidance.\(^10\)

- Defendants shall mandate twice daily screening of the Subclass members for symptoms and temperature, consistent with CDC recommendations and utilizing a structured screening tool.

- Defendants shall continue to update the Performance Standard, consistent with expert guidance and CDC Interim Guidance, with the goal of exceeding BOP and state prison system response levels.

- Defendants shall ensure subsequent iterations of the PRR do not dilute or distort CDC Interim Guidance, and shall ensure that facility operators are promptly notified of changes in CDC Interim Guidance.

2. “Defendants shall monitor and enforce facility-wide compliance with . . . the Performance Standard.”

Defendants’ Facility Checklists were apparently issued in April 2020 and do not monitor, let alone enforce, compliance with the recently-issued PRR III and IV. Nor do the Checklists focus on Subclass member protection. Taken together, Facility Checklist responses would present to ICE administrators at best an assemblage of brief vignettes, inadequate to command meaningful PRR enforcement. As Plaintiffs’ expert indicates, the surveys’ yes/no questions: are often compound; include serious omissions (e.g., do not include measures taken to protect medically vulnerable people); elicit uninformative responses; assume knowledge; and ask about inputs but not results. (Schlanger Decl. ¶¶ 45-62.) The Court is also concerned that such surveys cannot bridge the gap between self-report and reality, which should be an obvious component of monitoring.

Although Defendants have pre-pandemic procedures for inspection and enforcement, the extent to which they have activated these procedures in response to the pandemic is unclear. Defendants state that Detention Service Managers (“DSMs”) and Detention Standards Compliance Officers (“DSCOs”) “use a COVID-19 checklist to confirm the facility has the

\(^9\) See also CDC Guidance on cleaning agents and on cleaning and disinfecting practices.

\(^10\) See July 22 Interim Guidance at 8.
necessary plans and processes in place,” but admit these officers “cannot evaluate medical care process, effectiveness of care, or patient outcome.” (Vick Decl., Ex. 1 ¶ 36.) Moreover, Defendants do not explain how many facilities are covered by the DSMs and DSCOIs, and neglect to mention whether DSMs and DSCOIs are empowered to and in fact enforce compliance with relevant facility-wide standards. (Id.) Defendants’ statements regarding ICE Health Service Corps (“IHSC”) Field Medical Coordinators (“FMCS”) are similarly vague. (Id.) In contrast, Plaintiffs note that in 2017, DSMs monitored compliance at just 54 facilities. (Schlanger Decl. ¶ 32.) Similarly, IHSC provides direct care only at a small number of facilities, and it is not clear what mandates, if any, IHSC has issued, beyond the conclusory Detainee Checklist, a tool with many of the same faults as the Facility Checklist.¹¹

The PRR II, III and IV do include monitoring and enforcement provisions, but they are so vague that the Court concludes they are unlikely to result in substantial compliance with the PRR or a future Performance Standard across facilities. The PRR state that ICE will conduct “bi-weekly spot checks” of facilities, may issue deficiency notices, and may impose consequences on non-compliant facilities. (PRR IV at 6.) The PRR offer no definition of “spot check.” Defendants state that the documents concerning spot checks were produced to Plaintiffs on June 10, 2020. (Fox Decl., Ex. 4 at 30; Opp’n at 15.) Thus, the biweekly “spot checks” envisioned by the PRR II, III and IV are none other than the deeply flawed Facility Checklists, which are completed by the facility itself or are exceedingly vague.¹² As previously noted, the Facility Checklist does not reflect PRR II or III additions. (Opp’n at 15.)

Accordingly, the Court clarifies the Preliminary Injunction monitoring and enforcement requirement and ORDERS as follows:

- The Facility Survey shall be immediately and continuously updated to reflect the most current Performance Standard, shall include a section on Subclass member numbers and present conditions, and shall be corrected to address flaws noted by Plaintiffs’ expert. (See Schlanger Declaration ¶¶ 46-65.)

- Defendants shall require DSMs, DSCOIs or other trained ICE compliance personnel to verify in person the facility self reports. These in-person checks should occur at least monthly.

¹¹ The sole example before the Court of something approaching a centralized health protocol is the Detainee Checklist that must be completed prior to any transfer. As Plaintiff’s expert notes, there is no place on the form to indicate whether the person is high-risk or not. (Venters Decl. ¶ 7.) Similarly, the form has an overbroad checkbox for symptoms screening but does not include the screening questions actually used. (Id.)

¹² Defendants represented in the July 17 and August 5, 2020 hearings that the spot checks may be more involved. The scope and meaning of the term “spot check” in the PRR II, III and IV remains unclear, and the record is devoid of evidence to support Defendants’ assertion that spot checks go beyond self-report surveys, however.
• Defendants shall centrally track notices of non-compliance, action plans, corrective action plans, and notices of intent, (see PRR IV at 6), and shall document their follow-up. These documents shall be included in the bi-weekly disclosures to Plaintiffs.


The parties strongly disagree on how Risk Factor identification and custody determinations are to proceed under the Preliminary Injunction and Docket Review Guidance. After summarizing these positions, the Court reviews key features of the PI Order and Docket Review Guidance. The Court notes other relevant injunctions on pre-pandemic custody review procedures, and then clarifies and outlines the Preliminary Injunction’s risk identification and custody review procedures.

i. The Parties’ Contentions

Plaintiffs contend that Defendants are violating this provision of the Preliminary Injunction, because Defendants do not conduct meaningful custody determinations for all Subclass members, and do not maintain centralized mechanisms to ensure consistent determinations throughout their network of facilities. (Mot. at 16-17.) Plaintiffs interpret the Preliminary Injunction as permitting release of Subclass members regardless of the statutory authority for their detention. (Mot. at 17.) Plaintiffs also remark that 70% of the elderly and medically vulnerable detained Subclass members identified are not subject to mandatory detention, yet have not been released pursuant to a Fraihat custody review. (Fox Decl. ¶ 10.) They add that Defendants inflate the number of individuals “released” by including elderly and vulnerable detainees who have been deported, who have died, or who have been released pursuant to Immigration Judge orders. (Mot. at 19-20.)

Defendants respond that the Preliminary Injunction and Docket Review Guidance never contemplated a release request process wherein a detainee can request custody review pursuant to Fraihat and receive a decision within a certain amount of time. (Opp’n at 7-8.) They admit different ICE field offices permit submission of custody determination requests and that practices vary nationwide. (Id.) Defendants state they are “unable to identify detainees who were released solely based on the custody determination” and that everyone released after the Preliminary Injunction “would have received a Fraihat custody determination.” (Id. at 8.) ICE maintains that individuals held pursuant to 8 U.S.C. § 1226(c) may not be released under the Docket Review Guidance and Preliminary Injunction. (Id.)

At the August 4, 2020 hearing, the parties clarified their positions on the Docket Review Guidance. They agreed the PI Order and Docket Review Guidance together require Defendants to (1) affirmatively seek out subclass members and (2) allow detainees to identify themselves at any time as potentially having Risk Factors by informing facility staff or submitting medical
records. Plaintiffs, however, sought a more streamlined and organized process for detainees and advocates to obtain and submit medical files. The parties were much further apart on the subject of custody determinations under the Docket Review Guidance, as reflected in their papers. Plaintiffs reiterated the need for greater consistency and oversight of the process, and emphasized Docket Review Guidance language requiring that significant weight be given to the presence of Risk Factors. Plaintiffs interpret the Docket Review Guidance as mandating individualized findings supported by evidence and reasoning as to why alleged flight risk or danger outweighs the extreme risk of illness or death. Defendants repeated that some released Subclass members would have received Freihat custody determinations. Defendants could not point to evidence that field offices consistently give significant weight to the presence of a Risk Factor.

ii. The Process Envisioned by the PI Order

The Preliminary Injunction envisions the following two-step process: determine if one or more of the defined Risk Factors are present, and if so, timely evaluate or re-evaluate whether continued detention is appropriate, according significant weight to the presence of a Risk Factor and to public health. (Docket Review Guidance; PI Order at 38-39.) The process is meant to ensure medically vulnerable and elderly detainees are quickly identified and released where possible, and in all cases are accorded minimally adequate conditions of confinement to protect them from severe illness and death from COVID-19. The PI Order assumed the Docket Review Guidance—once mandated instead of merely requested—would result in meaningful reviews and the release of significant numbers of Subclass members.

Indeed, the Docket Review Guidance states that the presence of a risk factor is a “significant discretionary factor weighing in favor of release” and provides only limited exceptions to that rule. (Docket Review Guidance at 2.) For example, Section 1226(a) detainees should generally be released absent a specific finding they would pose a danger to property or persons. (Id.) It is reasonable to infer that only in rare cases would Defendants fail to release a Subclass member not subject to mandatory detention.

For “arriving aliens,” the Docket Review Guidance envisions reviews consistent with its existing parole directive issued pursuant to 8 U.S.C. § 1182(d)(5). That directive states release is in the public interest where significant adverse factors are not present, and already encouraged consideration of medical vulnerabilities. (Id. at 3; Vick Decl., Ex. 15 ¶ 22 (referencing ICE Directive 11002.1).)

The Docket Review Guidance states that for other categories of detainees, field offices are “responsible” for articulating individualized custody determinations. (Docket Review Guidance at 3.) The Guidance then repeats that the presence of a COVID-19 risk factor weighs in favor of release. (Id.)

The Preliminary Injunction equivocates on the validity of the Docket Review Guidance rule against releasing Subclass members subject to mandatory detention under 8 U.S.C.
1226(c).\textsuperscript{13} True, the PI Order noted previous administrations had permitted release of Section 1226(c) detainees in some circumstances. (PI Order at 10.) However, the Docket Review Guidance and Preliminary Injunction included seemingly inconsistent commands: field offices must identify and review the files of all detainees with Risk Factors and conduct individualized custody determinations, yet per the Docket Review Guidance the custody determination of a Section 1226(c) detainee can only be denied. (Docket Review Guidance.)

If the Court had left matters there, it might conclude that opining on the mandatory detention question now would materially alter the status of the case on appeal and would constitute more than a “minor adjustment” to the Preliminary Injunction. Nat. Res. Def. Council, 242 F.3d at 1163. However, the Court did not leave matters there. The Class Notice approved by the Court on May 15, 2020—before the notice of appeal—clarified that all Subclass Members, including those subject to mandatory detention, must receive custody reviews and can potentially be released under the Docket Review Guidance. (Notice and Discovery Order at 8 (approving class notice content); “Class Notice,” Dkt. No. 136 at 9 (“If you have any of these Risk Factors above, then ICE must review whether it can continue to hold you in detention. This applies even if you have previously been denied parole, bond, or habeas. This also applies no matter your custody classification, even if you have previously been convicted of a crime that subjects you to mandatory detention.”).) Defendants did not object to this content in their response to the notice and discovery ex parte, (Dkt. No. 139), and did not object to this content in the joint report after the first hearing on the notice and discovery, (Dkt. No. 147 at 19 (neglecting to mention the content of the proposed notice, but repeating the view that Section 1226(c) is an absolute “bar” to the exercise of discretion)). In keeping with the spirit of the Preliminary Injunction, which requires tracking and individualized consideration of each elderly and medically vulnerable detainee, the Court approved the Notice content. Accordingly, the Court expected that some individuals subject to mandatory detention would be released under the Docket Review Guidance and Preliminary Injunction, due to the public health emergency and extremely high degree of risk posed to some Section 1226(c) detainees. Detention under Section 1226(c) is still civil detention and detention cannot be punitive, or deliberately indifferent.

\textsuperscript{13} Defendants cite two cases from the Southern District of Florida for the proposition that mandatory detainees are not eligible for release. (Opp’n at 10 (citing Hamilton v. Acosta, 2020 WL 3035350, at *1 (S.D. Fla. June 4, 2020), adopting report and recommendation 2020 WL 3036782 (May 8, 2020); Gayle v. Meade, 2020 WL 2085482, at *7 (S.D. Fla. Apr. 30, 2020)).) However those cases uncritically repeat and apply the PRR and Docket Review Guidance. They do not endorse or provide a legal basis for Defendants’ view that Section 1226(c) detainees cannot be released under any circumstances. As the Court noted in the PI Order, under prior Republican and Democratic Administrations, ICE released individuals subject to “mandatory detention,” pursuant to then-operative guidelines and policies, and statutory and regulatory provisions. (PI Order at 10 (citing INA §§ 212(d)(5), 235(b), 236, 241; 8 C.F.R. §§ 1.1(g), 212.5, 235.3, 236.2(b))).
iii. Other Decisions on ICE Custody Determinations

The need for clarification and monitoring of this process is underscored by two recent district court decisions, which are directed to Defendants’ pre-pandemic custody decision-making procedures. First, in March, a district court enjoined ICE’s New York Field Office from:

using or applying practices or policies relating to the discretion by ICE officers to release to the community on recognizance or pursuant to bond, under Section 236 of the [INA], 8 U.S.C. § 1226(a), and all implementing regulations, to any person now or hereafter arrested by Defendants . . . in any manner more stringent or more onerous than those used or applied prior to June 6, 2017.


Then on July 22, 2020, in Heredia Mons v. Mcaleenan, another district court concluded plaintiffs had raised significant questions regarding Defendants’ compliance with a court order to provide “arriving alien” parole applicants with individualized determinations of parole eligibility and to comply with the agency’s own parole directive. Case No. 1:19-cv-1593 (D.D.C. Jul. 22, 2020), ECF No. 89 (referencing ICE Directive No. 11002.1). Plaintiffs in both cases highlighted a troubling pattern of alleged custody determination malfeasance, and courts granted them preliminary injunctive relief based on their likelihood of success.

iv. Clarifications

Given the acceleration of the pandemic, the evidence of Defendants’ non-compliance, and the fact that an appeal is pending, the Court must vindicate without enlarging the preliminary injunction. Court supervision and clarification are necessary, because Defendants have not provided evidence that the Docket Review Guidance standards are being meaningfully implemented, such that Risk Factors receive significant weight.

 Defendants attempt to evade the question by stating anyone released “would have” received a Fraihat custody review. (Mot. at 8.) However, many would have received custody reviews, been denied, and then secured release by alternate means, such as an IJ order or habeas petition. Although one would expect an increase in releases since the PI Order, Defendants have not documented a change. About 70% of Subclass members not subject to mandatory detention are still detained. Compounding the problem, Defendants have used inconsistent risk factor identification and custody review procedures. The result has been increased detainee anxiety and attorney frustration. (Mot. at 16-22; Saenz Decl. ¶¶ 16-17; Russel Decl. ¶¶ 7-16; Edgerton Decl. ¶¶ 5-29; Feldman Declaration ¶¶ 8-18; Zwick Decl. ¶¶ 10-27; Lunn Decl. ¶¶ 7-12; Rivera Decl. ¶¶ 10-34; Corchada Decl. ¶¶ 10-24; Bailey Decl. ¶¶ 4-14; Doubosarskaia Decl. ¶¶ 5-9; Morales Decl. ¶¶ 7-21 (describing patchwork response across several field offices); Dobbins Decl. ¶¶ 4-12; King ¶¶ 6-11.)
As a result, the following clarifications are necessary to achieve the original purposes of the Preliminary Injunction and ensure meaningful compliance:

- The Preliminary Injunction requires Defendants to identify and track detainees with risk factors within five days of their detention (step one) then to make a “timely” custody determination (step two). (PI Order at 38.)
  - At step one, Defendants must affirmatively identify and track detainees with Risk Factors. However, detainee medical files might be incomplete. To account for this likelihood, a detainee or their counsel may promptly obtain a copy of the medical file and may supplement medical records at any time. Defendants shall streamline and clarify procedures for such requests. Defendants’ medical personnel shall review newly submitted records within five days and inform the detainee and his or her counsel of the result.
  - At step two, Defendants must complete a “timely” custody determination. Only in rare cases should the determination take longer than a week.
  - Defendants shall provide notice of the result of the custody determination to the Subclass member and his or her counsel. The notice shall mention the Risk Factor(s) identified, and in cases of non-release shall reference a basis for continued detention in the Docket Review Guidance.

- In order to increase compliance and reduce detainee and attorney confusion, Defendants shall advertise and implement consistent procedures across field offices, for both steps outlined above. Defendants shall ensure that the presence of a Risk Factor is given significant weight and that the custody reviews are meaningful.
  - Blanket or cursory denials do not comply with the Preliminary Injunction or with the Docket Review Guidance’s instruction to make individualized determinations.
  - Only in rare cases should a Subclass member not subject to mandatory detention remain detained, and pursuant to the Docket Review Guidance, a justification is required. (See also PRR IV at 20 (requiring case-by-case decisions and emphasizing public health).)
  - Subclass members subject to mandatory detention shall also receive custody determinations. Defendants shall not apply the Docket Review Guidance rule against release of Section 1226(c) detainees so inflexibly
that none of these Subclass members are released. Section 1226(c) Subclass members should only continue to be detained after individualized consideration of the risk of severe illness or death, with due regard to the public health emergency.

- Defendants shall centrally track and report in their biweekly productions the results of the Risk Factor and custody determinations.

- To the extent Fraihat conflicts with another injunction regarding custody determination practices or procedures at particular field offices or facilities, the other court orders take precedence.

  - The Risk Factor “Severe psychiatric illness” includes psychiatric illnesses that make it difficult for the individual to participate in their own care, that make it unlikely the individual will express symptoms, or that increase the risk of complications from the virus.\(^\text{14}\)

Finally, the Court reiterates that the above relief extends to Subclass members regardless of their bond or parole requests or habeas petitions. (See PI Order at 38.) The Preliminary Injunction and subsequent orders address only Defendants’ systemwide response to the pandemic. The case does not opine on the lawfulness of conditions faced by any individual detainee, nor does it determine the lawfulness of conditions at any particular facility. As a result, this action should not be understood to preclude emergency habeas petitions on either an individual or a group basis. Such petitions should continue to be directed to the courts where venue is appropriate.

C. Special Master

Defendants have established a pattern of noncompliance or exceedingly slow compliance that calls for more active Court monitoring than has heretofore been the case. The Court defers for now the question of whether and how a special master could assist. Plaintiffs may renew their request in the future.

IV. CONCLUSION

Accordingly, the Court GRANTS IN PART AND DENIES IN PART the motion to enforce.

IT IS SO ORDERED.

\(^{14}\) Defendants did not provide a reason or a clinical basis for their narrow definition of severe psychiatric illness, whereas Plaintiffs did include expert declarations on this subject. (Reply at 10-11.) The PRR III and IV appear to concede the point by abandoning the previous narrow definition.
From: Loiacono, Adam V  
To: [b](6), [b](7)(C)  
Subject: FW: Torrance

Thanks,

Adam V. Loiacono  
Deputy Principal Legal Advisor for Enforcement and Litigation  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
[phone: 202-510-]  
[b](6), [b](7)(C) @ice.dhs.gov

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From: Doyle, Kerry  
Sent: Tuesday, December 7, 2021 3:25 PM  
To: [b](6), [b](7)(C)  
Subject: RE: Torrance

Yes. Good idea. I think we need to [b](5)

[b](5)

[b](6) b schedule.

Kerry E. Doyle  
Principal Legal Advisor  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
Office: 202-732-  
Cell: 202-510-
From: Trickler-Mcnulty, Claire  
Sent: Tuesday, December 7, 2021 3:22 PM  
To: Doyle, Kerry  
Cc: [REDACTED]  
Subject: RE: Torrance

Kerry –

I have been in some of the meetings, but wasn’t able to be in most of it today. I am very open to

Claire

From: Doyle, Kerry  
Sent: Tuesday, December 7, 2021 2:32 PM  
To: Trickler-Mcnulty, Claire  
Cc: [REDACTED]  
Subject: Torrance

Hi Claire,

Thanks,
Kerry

Kerry E. Doyle
Principal Legal Advisor
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
Office: 202-732
Cell: 202-510

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Thanks for the background. Happy to defer or assist in any way you need.

Adam V. Loiacono
Deputy Principal Legal Advisor for Enforcement and Litigation
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
Phone: 202-503-5220
Loiacono.Adam.V@ice.dhs.gov

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Hi Adam,

(b)(5)
Please let me know if you need anything else at this time.

Best,

Acting Senior Advisor to the Principal Legal Advisor
U.S. Department of Homeland Security
Immigration and Customs Enforcement
(267) 246-1826 (mobile)

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From: Davis, Mike P <ice.dhs.gov>
Sent: Tuesday, December 7, 2021 12:49 PM
To: ice.dhs.gov
Subject: FW: Torrance County Detention Facility

I don't think we'll have a speaking role at this 1 p.m. meeting.

Thanks,

Mike

Michael P. Davis
Executive Deputy Principal Legal Advisor
U.S. Immigration and Customs Enforcement

With honor and integrity, we will safeguard the American people, our homeland, and our values.

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From: [b](8), [b](7)(C)@ice.dhs.gov>
Sent: Monday, November 8, 2021 4:28 PM
To: Davis, Mike [b](8), [b](7)(C)@ice.dhs.gov>; Padilla, Kenneth [b](8), [b](7)(C)@ice.dhs.gov>
Subject: FW: Torrance County Detention Facility

Hi, Mike and Ken.

[b](8), [b](7)(C), [b](5)
(b)(6), (b)(7)(C)

Associate Deputy Principal Legal Advisor for Field Legal Operations, West
Acting Chief Counsel, OPLA Detroit (includes Michigan and Ohio)
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
Desk: (313) 446-
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From: @ice.dhs.gov>
Sent: Monday, November 8, 2021 11:07 AM
To: @ice.dhs.gov>
Subject: RE: Torrance County Detention Facility

Still waiting for some of our attorneys to indicate if they have witnessed or heard the IJs say or do that which was alleged in the email below. Up to now, all responses have been negative.
I attached ERO El Paso’s response to the allegations. ERO El Paso defers to EOIR with respect to the third bullet point and I concur. But I’m asking my folks whether they can confirm bullet points #3 and #4. Please stand by.

Should you have questions, please let me know.

Take care,

Chief Counsel
Office of the Principal Legal Advisor, El Paso
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security

To register for eService, please go to https://eserviceregistration.ice.gov/

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***SENSITIVE/PRIVILEGED***PRE-DECISIONAL***ATTORNEY WORK PRODUCT***

From: @ice.dhs.gov
Sent: Monday, November 8, 2021 5:00 AM
To: @ice.dhs.gov
Subject: RE: Torrance County Detention Facility
Thank you.

From: [Redacted]
Sent: Monday, November 8, 2021, 6:52 AM
To: [Redacted]
Cc: [Redacted]
Subject: RE: Torrance County Detention Facility

Good morning,

Hope all is well.

I will get with local ERO about the concerns raised regarding Torrance.

Thanks,

Sent with BlackBerry Work
(www.blackberry.com)

From: [Redacted]
Date: Sunday, Nov 07, 2021, 7:49 PM
To: [Redacted]
Cc: [Redacted]
Subject: Torrance County Detention Facility

I hope this email finds you well. I apologize about the Sunday email – no response is needed today, but if I can get a response on Monday, that would be appreciated.
Associate Deputy Principal Legal Advisor for Field Legal Operations - West
Acting Chief Counsel, Office of the Principal Legal Advisor, Detroit (includes Michigan and Ohio)
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
Desk: (313) 444-4622
Cell: (313) 399-0867

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Press Release

Dec. 3: **US-Brazil coordination leads to takedown of significant human smuggling ring**

**Press**

**HSI – Orlando: Narcotics sentencing, news release**
A Middle District Florida USAO news release will quote HSI Tampa ***ASAC****(b)(6); (b)(7)(C)** on the sentencing of a man on narcotics charges. DEA and Orlando Police Department are also credited in this investigation. PAO will amplify the release on Twitter @HSITampa. **[(b)(6)]**

**HSI – Tampa: Significant child exploitation sentencing, news release**
**Acting Tampa ASAC** [(b)(6); (b)(7)(C)] is quoted in a Middle District Florida USAO news release on a 17-year sentencing for a local man on child exploitation charges. PAO will amplify the release on Twitter @HSITampa. **[(b)(6)]**

**HSI - Nashville: Eastern District of Kentucky U.S. Attorney raises awareness about how fraudsters use and recruit money mules (USAO release)**
The Department of Justice announced the completion of the fourth annual **Money Mule Initiative**, which targeted networks of individuals through which international fraudsters obtain proceeds of fraud schemes. The U.S. Attorney’s Office for the eastern district of Kentucky prosecuted and convicted three such money mules in 2021, with the assistance of HSI and other federal agencies. These individuals, sometimes referred to as money mules, receive money from fraud victims and forward the illicit funds, often to overseas perpetrators. The campaign was conducted simultaneously with a **Europol initiative**, the European Money Mule Action (EMMA). **[(b)(6); (b)(7)(C)]**

**HSI – San Diego: Japanese news agency request HSI ride along, TBS (Ayumi Kuriki)**
Tokyo Broadcasting System Los Angeles Bureau Reporter Ayumi Kuriki requested to do a ride along with HSI to document illegal maritime smuggling operations. PAO explained that HSI does not do ride alongs of that nature and forwarded the query to CBP for response **[(b)(6); (b)(7)(C)]**

**Pending Queries**

**ERO – El Paso: Haitian detainee allegations about Torrance (NM) detention facility, Searchlight New Mexico (Luciana Perez Uribe) and Democracy Now! (Maria Inés Taracena)**
Reporters are requesting comment on allegations made by Haitian detainees at the Torrance County Detention Facility (TCDF) regarding lack of legal services, inadequate food and medical
care, mistreatment, insufficient access to information in Haitian Creole, and immigration cases moving “disproportionately fast” through court.

**Status:** PAO drafted Issue Paper for review/approval using a previously approved (Nov. 11) Statement that reads that “ICE civil detention system promotes access to counsel through a range of programs and standards. Detained noncitizens can communicate with counsel telephonically, via tablet, and through in-person legal visitation. ICE provides general legal information to all detained noncitizens; this information is provided through an overview video shown during orientation, through access to legal resources in a facility law library, and where available, through a Legal Orientation Program or Know Your Rights presentations provided by local legal service providers. Detainees are also provided with contact information for pro bono legal services. Torrance County Detention Facility (TCDF) is covered by ICE’s Performance Based National Detention Standards 2011, rev. 2016, which cover all aspects of detainee care, including legal access, visitation, recreation, medical, mental health and dental care.”

(b)(6); (b)(7)(C)

**ERO – HQ: ICE NTAs,** *Daily Caller (Jennie Taer)*

Reporter request what information is needed for one, how is that information validated. Deadline: As soon as feasible.

**Status:** With ERO Tasking

(b)(6); (b)(7)(C)

**ERO – HQ: CoreCivic Detention Facility Contract,** *Midwest Newsroom (Steve Vockrodt)*

Requesting whether or not ICE is interested or pursuing an ICE contract with CoreCivic for a detention facility (KS) currently being used by USMS, as that agency is not renewing its contract. ICE is not pursuing a contract with CoreCivic for this facility. Deadline: As soon as feasible.

**Status:** Proposed response awaiting OPA approval.

(b)(6); (b)(7)(C)

**ERO – HQ: ICE transfers of minors and adults,** *Daily Wire (Luke Rosiak)*

Reporter Luke Rosiak with Daily Wire is inquiring about recent reports on charter flights with migrants landing in various domestic cities, including Westchester/White Plains, Jacksonville, and Chattanooga. The reporter says these are mostly unaccompanied minors who are being settled in the US rather than removed. PAO plans to provide reporter previously cleared background information pending Field Ops approval. Deadline: Tuesday, Dec. 6.

**Status:** Pending Field Ops review

(b)(6); (b)(7)(C)

**ERO – HQ: Decrease in ICE removals over the last year,** *The Epoch Times (Zack Stieber)*

Reporter with Epoch Times is inquiring about why the deportations have dropped with new administration.

U.S. Immigration and Customs Enforcement has established civil immigration enforcement priorities to most effectively achieve our goals with the resources we have. We continue to focus our enforcement on noncitizens who are a threat to our national security, public safety, and border security. Deadline: ASAP.
Status: OPA clearance
(b)(6); (b)(7)(C)

Clips


ICE.gov
NTR

Social Media
NTR

Internal
NTR

Look Ahead
December

7  Representatives from the Human Rights Violators and War Crimes Center plan to attend an off-the-record call with reporter Nick Miroff from Washington Post for a story he would like to pursue on the Center and past and ongoing cases. (b)(6); (b)(7)(C)

10  KABC reporter John Haskell will interview DSAC Eddy Wang at the HSI Los Angeles Field Office in Long Beach. The interview will be on-camera and focus on how HSI prepares for a large scale event like the Super Bowl. (b)(6);

10  IPR Center – Holiday Shopping Tom Temin, The Federal Drive – Fed News Radio, will interview DAD Ricardo Mayoral about the holiday shopping guide. More than how it helps consumers during the holiday shopping season, they are interested in what went into the toolkit’s creation, the partners that were involved and any trends in the ways holiday shoppers are being scammed (b)(6); (b)(7)(C)

15  Resident Special Agent in Charge. HSI-KC will be interviewed by the Branson Globe via telephone regarding HSI’s counterfeit goods mission and how the community can help identify and avoid these items. Talking points will focus on the IPR Holiday Shopping Guide and IPR messaging. HSI KC PAO Tanya Roman will facilitate the interview (b)(6); (b)(7)(C)

17  HSI New Orleans acting SAC Jack Staton will host a press conference to announce the results of the holiday-related IPR initiative operated in conjunction with CBP, with HSI as the lead. We will have all the counterfeit items on display and announce the monetary MSRP value of the seized items. Last year, HSI New Orleans did not host a press conference due to covid but did a release instead. (b)(6); (b)(7)(C)
TBD

**HSI – Transnational Organized Crime Backgrounder, The Trace.org**

Reporter Steve Fisher, is interested in learning more about HSI’s work against weapons smuggling to Mexico in support of an article intended to provide an overview on the topic within the next two months. Earlier this year ICE HSI announced the results of Operation Without a Trace through a press release and July 2, 2021 press briefing held at the U.S. Customs and Border Protection Juarez-Lincoln International Bridge in Laredo, Texas, where **HSI TOC II Division Chief, Joseph Lestrange**, served as lead spokesperson. If approved, Mr. Lestrange will be the designated Subject Matter Expert for a background discussion with Steve. *(b)(6); (b)(7)(C)*
Will do.

Thanks!

Acting Chief
District Court Litigation Division
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
202-893-1605
@ice.dhs.gov

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From @ice.dhs.gov
Sent: Friday, December 3, 2021 11:13 AM
To: Loiacono, Adam V @ice.dhs.gov
Cc: @ice.dhs.gov
Subject: FW: Fraelat: Special Master Hearing Update and Followups

Adam,

FYSA

From @usdoj.gov
Sent: Thursday, December 2, 2021 3:59 PM
To: @ice.dhs.gov @ice.dhs.gov; Robins, @usdoj.gov @usdoj.gov; @ice.dhs.gov @ice.dhs.gov
Cc: @ice.dhs.gov @ice.dhs.gov; Robins, @usdoj.gov @usdoj.gov; @ice.dhs.gov @ice.dhs.gov; @HQ.DHS.GOV; @ice.dhs.gov; @ice.dhs.gov
Subject: RE: Fraelat: Special Master Hearing Update and Followups

2022-ICLI-00045 4426
Thanks. There isn’t much happening in the case right now, so we should be able to minimize our random requests and let focus on review.
Best,

From: [Email Address]
Sent: November 29, 2021 4:23 PM
To: [Email Address]
Cc: [Email Address]

Subject: [EXTERNAL] RE: Faireh: Special Master Hearing Update and Followups

Thanks,
Subject: RE: Fraihat: Special Master Hearing Update and Followups

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact ICE SOC SPAM with questions or concerns.

Best,

From: [Email Address]
Subject: RE: Fraihat: Special Master Hearing Update and Followups
From: (b)(6), (b)(7)(C)
Sent: October 29, 2021 11:05 AM
To: (b)(6), (b)(7)(C)  @ice.dhs.gov
     (b)(6), (b)(7)(C)  @usdoj.gov
     (b)(6), (b)(7)(C)  @ice.dhs.gov
     (b)(6), (b)(7)(C)  @usdoj.gov
     (b)(6), (b)(7)(C)  @ice.dhs.gov
     (b)(6), (b)(7)(C)  @ice.dhs.gov
     (b)(6), (b)(7)(C)  @usdoj.gov
     (b)(6), (b)(7)(C)  @ice.dhs.gov
     (b)(6), (b)(7)(C)  @hq.dhs.gov
     Padilla, Kenneth (b)(6), (b)(7)(C)  @ice.dhs.gov
     (b)(6), (b)(7)(C)  @HQ.DHS.GOV
     (b)(6), (b)(7)(C)  @ice.dhs.gov
     (b)(6), (b)(7)(C)  @ice.dhs.gov
     (b)(6), (b)(7)(C)  @usdoj.gov
     (b)(6), (b)(7)(C)  usdoj.gov
     (b)(6), (b)(7)(C)  ice.dhs.gov

Subject: RE: Fraihat: Special Master Hearing Update and Followups
Best,

From: [b](6); [b](7)(C)<@ice.dhs.gov>

Sent: October 19, 2021 4:56 PM

To: [b](6); [b](7)(C)<@ice.dhs.gov>; [b](6); [b](7)(C)<@usdoj.gov>

Cc: [b](6); [b](7)(C)<@ice.dhs.gov>

Subject: [EXTERNAL] RE: Fraihat: Special Master Hearing Update and Followups

Hi [b](6); [b](7)(C)

[b](6)
In addition, in the “no R tag” saved search, there were approximately 10 documents with no image file. Therefore, the reviewer marked it as a technical issue and listed the reason in the description box.

Kind regards,

[Redacted]

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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From: [Redacted]@ice.dhs.gov
Sent: Tuesday, October 19, 2021 4:35 PM
To: [Redacted]@usdoj.gov; [Redacted]@usdoj.gov
Cc: [Redacted]@ice.dhs.gov; [Redacted]@ice.dhs.gov
Subject: RE: Fraihat: Special Master Hearing Update and Followups

[Redacted]
From: @usdoj.gov
Sent: Tuesday, October 19, 2021 4:21 PM
To: @ice.dhs.gov; @ice.dhs.gov
Cc: Jan@ice.dhs.gov; ice.dhs.gov; Padilla, Kenneth; HQ.DHS.GOV; ce.dhs.gov

Subject: RE: Fraihat: Special Master Hearing Update and Followups

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Best,

From: @usdoj.gov
Sent: October 6, 2021 10:30 AM
To: @ice.dhs.gov; @ice.dhs.gov
Cc: @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov

2022-ICLI-00045 4434
a. Can be found in a saved search near the current searches, see screenshot

Best,

[Name]

From: ice.dhs.gov
Sent: October 1, 2021 9:24 AM
To: usdoj.gov; usdoj.gov; usdoj.gov
Subject: [EXTERNAL] RE: Faihat: Special Master Hearing Update and Followups

Thank you. We’ve assigned people to work on these beginning Monday will handle #3 below on Tuesday and will therefore be unavailable on Tuesday for any other e-mails/inquiries/questions. If there’s anything that can’t wait an extra 24 hours will be covering.

From: @usdoj.gov

Sent: Thursday, September 30, 2021 1:37 PM

To: @ice.dhs.gov

Subject: RE: Faihat: Special Master Hearing Update and Followups

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Thanks. Once you’ve talked to the lab, please let me know how many (total) have been produced and how many are remaining. Would like to try to ask people to work to ensure everything is completed by COB Wednesday just in case of shutdown.

From: @usdoj.gov
Sent: Tuesday, September 28, 2021 10:56 AM
To: @usdoj.gov; @ice.dhs.gov
Cc: @ice.dhs.gov; @ice.dhs.gov

Subject: RE: Fraihat: Special Master Hearing Update and Followups

Good morning.

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact ICE SOC SPAM with questions or concerns.
We did submit a production request on Friday, so there will be about 4,400 docs going out today or tomorrow. Once I talk to the lab today, I’ll find out how many are left and we will go from there.

AL Exclusion batches:
(b)(5), (b)(7)(E)
Subject: RE: Fraihat: Special Master Hearing Update and Followups

Best,

From: @usdoj.gov
Sent: September 24, 2021 12:47 PM
To: @ice.dhs.gov; @usdoj.gov
Cc: @ice.dhs.gov; @hq.dhs.gov; Padilla, Kenneth

2022-ICLI-00045 4442
Subject: RE: Fraihat: Special Master Hearing Update and Followups

Thank you,

From: [Redacted]@usdoj.gov
Sent: Friday, September 24, 2021 12:15 PM
To: [Redacted]@usdoj.gov; [Redacted]@ice.dhs.gov
Cc: [Redacted]@usdoj.gov; [Redacted]@ice.dhs.gov

Subject: [EXTERNAL] RE: Fraihat: Special Master Hearing Update and Followups

From: [Redacted]@usdoj.gov
Sent: Friday, September 24, 2021 12:08 PM
To: [Redacted]@ce.dhs.gov; [Redacted]@usdoj.gov; [Redacted]@ice.dhs.gov

Subject: RE: Fraihat: Special Master Hearing Update and Followups

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Hello,

Thank you,

From: [b](b)(6), [b](b)(7)(C)
Sent: Wednesday, September 15, 2021 11:35 AM
To: [b](b)(6), [b](b)(7)(C)
Cc: [b](b)(6), [b](b)(7)(C)
Subject: RE: Fraihat: Special Master Hearing Update and Followups

Thank you.

From: [email]@ice.dhs.gov>
Sent: Wednesday, September 15, 2021 9:34 AM
To: [email]@ice.dhs.gov>
Cc: [email]@ice.dhs.gov>

Thank you,

From: [email]@usdoj.gov>
Sent: Monday, September 13, 2021 4:31 PM
To: [email]@ice.dhs.gov>
Cc: [email]@usdoj.gov>

reported he finished those documents, so first-line should now be complete. Can you let us know how much second-line is remaining?
Subject: RE: Fraihat: Special Master Hearing Update and Followups

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Just reassigned to [b](6), (b)(7)(C)

Thank you,

[b](6), (b)(7)(C)

From: [b](6), (b)(7)(C) @ice.dhs.gov

Sent: Monday, September 13, 2021 4:28 PM

To: [b](6), (b)(7)(C) @usdoj.gov

Cc: [b](6), (b)(7)(C) @ice.dhs.gov; [b](6), (b)(7)(C) @usdoj.gov; [b](6), (b)(7)(C) @ice.dhs.gov;

Subject: RE: Fraihat: Special Master Hearing Update and Followups

Reassign to contractor [b](6), (b)(7)(C) and please confirm when done so I can lead the contractor PM know.
Subject: RE: Fraihat: Special Master Hearing Update and Followups

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I apologize, I never received that email. I just pulled it up and it looks like there are still two batches that have not been completed for 1st Pass Active Learning Responsive. One batch is under and one is under I attached a screenshot. I can reassign them, but would need to know who to reassign to.

Thank you,

From: @ice.dhs.gov
Sent: Monday, September 13, 2021 3:13 PM
To: @ice.dhs.gov

Subject: RE: Fraihat: Special Master Hearing Update and Followups

...e-mailed on 9/2 to say that they had gone back in and checked in all documents that were under their names. Is there potentially an issue with CORA on those documents? Alternatively, is someone able to just check those documents back in so that someone else can review?

From: @usdoj.gov
Sent: Monday, September 13, 2021 3:07 PM
To: @usdoj.gov; @ice.dhs.gov; @ice.dhs.gov
Subject: RE: Fraihat: Special Master Hearing Update and Followups

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ICE,

Thank you,
Responses below in yellow highlight. I hope that this is helpful. Please let us know if you have additional follow up.

Have a nice weekend.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-9001

Thank you for the quick turnaround on this family will provide clarifications shortly.
Sent from my iPhone

On Sep 10, 2021, at 7:35 PM [b](6). [b](7)/(C) [a]ice.dhs.gov> wrote:

We have received follow up questions for OIL in red for clarification, please see below. Thank you!

[b](5)
Kind regards,

[Redacted]

[Redacted]

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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From: [Redacted]  
Sent: Friday, September 10, 2021 5:34 PM  
To: [Redacted]  
Cc: [Redacted]  
Subject: RE: Fronhat: Special Master Hearing Update and Followups

[Redacted]

[Redacted]
ICE,

We just had our meet and confer with Plaintiffs. Below are follow up questions. Please provide responses by COB Tuesday.
We’d like to get the vaccine timeline back to opposing counsel tonight, and would therefore flag our questions/concerns about Venters letter distribution as a top priority.

We also just completed our meet and confer with opposing counsel regarding transfers and will be following up with several follow-up questions for ICE.

Thanks.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

Subject: RE: Friihat: Special Master Hearing Update and Followups

We are working on these responses, but for your first question, we did confirm the response today pertained to non-IHSC facilities:
Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 25

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Subject: RE: Fraihat: Special Master Hearing Update and Followups

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Thank you,

From: ice.dhs.gov
Sent: Friday, September 10, 2021 3:04 PM
To: ice.dhs.gov; usdoj.gov; usdhs.gov; uscis.gov; @ice.dhs.gov; @usdoj.gov
Cc: usdhs.gov; uscis.gov; usdoj.gov; @usdhs.gov; @usdoj.gov

Subject: RE: Fraihat: Special Master Hearing Update and Followups

Hi OIL,

Here are the additional responses to your questions, in red:
Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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From: [Redacted]
Sent: Thursday, September 9, 2021 5:25 PM
To: [Redacted]
Cc: [Redacted]
Subject: RE: Fraihat: Special Master Hearing Update and Followups

Hi

Below please find ICE's responses in red. Please note that there are a few questions where ICE is still working on the responses, highlighted in blue.

Kind regards,

[Redacted]

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253- [Redacted]

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From: [Redacted]
Sent: Wednesday, September 8, 2021 2:04 PM
To: [Redacted]

Subject: RE: Fraihat: Special Master Hearing Update and Followups

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact ICE SOC SPAM with questions or concerns.
Thank you,

From: [b](6), [b](7)(C)
Sent: Tuesday, September 7, 2021 6:13 PM
To: [b](6), [b](7)(C) @usdoj.gov>
Cc: [b](6), [b](7)(C) @usdoj.gov>

Subject: RE: Fraihat: Special Master Hearing Update and Followups

Hi OIL,
Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253

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Subject: RE: Fraihat: Special Master Hearing Update and Followups

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ICE,

[Redacted]

Thank you,
Hi OIL:

Please see below for answers to the transfer questions from Plaintiffs, in red:

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253...

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From: @ice.dhs.gov>
Sent: Thursday, September 2, 2021 4:26 PM
To: @usdoj.gov; @ice.dhs.gov>
Cc: @usdoj.gov; @ice.dhs.gov; @ice.dhs.gov>

Subject: RE: Fraihat: Special Master Hearing Update and Followups

Good afternoon,

Thanks!

Associate Legal Advisor
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
From: [redacted]@usdoj.gov
Sent: Thursday, September 2, 2021 3:59 PM
To: [redacted]@ice.dhs.gov; [redacted]@usdoj.gov
Cc: [redacted]@ice.dhs.gov; [redacted]@usdoj.gov

Subject: RE: Faihat: Special Master Hearing Update and Followups

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Best regards,

Senior Litigation Counsel
U.S. Department of Justice, Civil Division
Office of Immigration Litigation – District Court Section
P.O. Box 868 | Ben Franklin Station | Washington, DC 20044
Direct: (202) 532-1111 Fax: (202) 305-7000 | Email: usdoj.gov

From: bice.dhs.gov>
Sent: September 2, 2021 1:53 PM
To: bice.dhs.gov>
Cc: bice.dhs.gov; Padilla, Kenneth bice.dhs.gov; bice.dhs.gov
Subject: RE: FRAIHT: Special Master Hearing Update and Followups

Please see below in highlight for a few questions or updates from ICE:

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 25

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From: (Redacted)
Sent: Thursday, September 2, 2021 12:09 PM
To: (Redacted)
Cc: (Redacted)

Subject: RE: Fraihat: Special Master Hearing Update and Followups

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Good Morning, ICE –

OIL is reaching out to follow up on the below items, which were most recently sent in an email from me on 8/25:

(b)(6), (b)(7)(C)
From: @ice.dhs.gov
Sent: Thursday, September 2, 2021 11:22 AM
To: @usdoj.gov

Subject: RE: Fraihat: Special Master Hearing Update and Followups

Hi,

ICE conurs with OIL making edits to reflect ICE’s position:

ICE’s position is that vaccines will be offered (under a normal definition of the word) within 72 hours of intake and administered within 14 days, with some exceptional circumstances taking no more than 30 days to get a shot administered.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 25 (b)(6)...

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From: [Email Address]
Sent: Wednesday, September 1, 2021 5:11 PM
To: [Email Address]
Cc: [Email Address]

Subject: RE: Fraihat: Special Master Hearing Update and Followups

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ICE –

(b)(5)

Could ICE please confirm this position and send any other thoughts on this approach by COB tomorrow, Thursday, September 2nd, ahead of Friday’s hearing before the Special Master? Thank you.

Best Regards,

(b)(6), (b)(7)(C)

Trial Attorney
U.S. Department of Justice, Civil Division
Office of Immigration Litigation-District Court Section
P.O. Box 868, Ben Franklin Station
Washington, DC 20044
Tel. 202.594.0550 Fax. 202.305.7000
@usdoj.gov

From: @usdoj.gov
Sent: Tuesday, August 31, 2021 11:21 AM
To: @ice_dhs.gov
Cc: @ice_dhs.gov; usdoj.gov; b6; b7(c)

Subject: RE: Fraihat: Special Master Hearing Update and Followups

Great, thank you Emily!

From: @ice_dhs.gov
Sent: Tuesday, August 31, 2021 11:10 AM
To: @usdoj.gov
Cc: @usdoj.gov; b6; b7(c)

Subject: RE: Fraihat: Special Master Hearing Update and Followups

Hi

Thanks, ICE is working on the questions.

Kind regards,
b6; b7(c)
Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-...

--- ATTORNEY/CLIENT PRIVILEGE --- ATTORNEY WORK PRODUCT ---

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From: @usdoj.gov
Sent: Tuesday, August 31, 2021 11:09 AM
To: @ice.dhs.gov,
Cc: @ice.dhs.gov,

Subject: RE: Fraihat: Special Master Hearing Update and Followups

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact ICE SOC SPAM with questions or concerns.

ICE,

I apologize – I got confused with when this email is due. Can you please send us your edits by 1pm?

Thank you,
From: (b)(6), (b)(7)

Sent: Tuesday, August 31, 2021 10:42 AM

To: (b)(8), (b)(7)

Cc: @ice.dhs.gov

Subject: RE: Fraihat: Special Master Hearing Update and Followups

ICE,

Thank you,

----

Dear Judge Walsh and Counsel,


Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

--- ATTORNEY/CLIENT PRIVILEGE --- ATTORNEY WORK PRODUCT ---

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From: @usdoj.gov>

Sent: Monday, August 30, 2021 11:29 AM

To: @ice_dhs.gov>

Cc: @usdoj.gov; @ice_dhs.gov; @usdoj.gov;

Subject: RE: Fraihat: Special Master Hearing Update and Followups

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Good morning ICE,

We are following up to make sure that we will receive answers to the below questions by COB today so that we can respond to the Special Master tomorrow. Could ICE give us an ETA on responses so that we can prepare accordingly?

Also, we are awaiting ICE’s update on mediation so that we can get back to opposing counsel. When can we expect to hear back from ICE regarding its position on mediation after our call on Friday?

Thank you,

From: [b](CIV)
Sent: Friday, August 27, 2021 2:57 PM

Subject: Freihat: Special Master Hearing Update and Followups

ICE,
Thank you,

(b)(6), (b)(7)(C)

Trial Attorney
United States Department of Justice
Office of Immigration Litigation – District Court Section
P.O. Box 868 | Ben Franklin Station | Washington, D.C. 20044
The following is a list of postings that assist the detained population at the TCDF:

<table>
<thead>
<tr>
<th></th>
<th>Posting</th>
<th>Page</th>
</tr>
</thead>
<tbody>
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<td>PREA Zero Tolerance (Spanish)</td>
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<tr>
<td>2</td>
<td>PREA Zero Tolerance (English)</td>
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<td>3</td>
<td>PREA PHONE (Spanish)</td>
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<td>4</td>
<td>PREA PHONE (English)</td>
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<td>5</td>
<td>PREA REPORTING PROCEDURES</td>
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<td>21</td>
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<td>ICE SEX ABUSE ASSAULT AWARENESS</td>
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<td>KNOW YOUR RIGHTS</td>
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<td>KNOW YOUR RIGHTS</td>
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<td>MAYORKAS CASE (Spanish)</td>
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<td>35</td>
<td>CORECIVIC CYCLE MENU</td>
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<td>36</td>
<td>ORR SEP. FROM CHILDREN POSTING (Spanish)</td>
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<td>VISTING SCHEDULE (Spanish)</td>
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<td>VISTING SCHEDULE (English)</td>
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<td>MAIL/CORRESPONDENCE (Spanish)</td>
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<td>DETENTION ASSISTANCE ALTERNATIVES (SP)</td>
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<td>43</td>
<td>FACILITY ADDRESS</td>
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<td>44</td>
<td>UNMONITORED CALLS INSTRUCTIONS</td>
<td></td>
</tr>
<tr>
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<td>KNOW YOUR RIGHTS (Spanish)</td>
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<td>MAYORKAS CASE (English)</td>
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<td>ACCESS TO HYGEINE CORE CIVIC</td>
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<td>RECREATION SCHEDULE</td>
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<td>LIBRARY LEGAL BOOKS MEMO</td>
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<tr>
<td>53</td>
<td>HOW TO USE THE MICROWAVE</td>
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<tr>
<td>54</td>
<td>SPEED DIAL LISTING PHONE NUMBERS</td>
<td></td>
</tr>
</tbody>
</table>
July 29, 2021

TO: Russell Hott
   Assistant Director Custody Management

FROM: Inspector 4
   Lead Compliance Inspector
   The Nakamoto Group, Inc.

SUBJECT: Annual Inspection of the Torrance County Detention Facility

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS 2011) of the Torrance County Detention Facility in Estancia, New Mexico during the period of July 27-29, 2021. This is an IGSAs.

The annual inspection was performed under the guidance of Inspector 4, Lead Compliance Inspector. Team members were:

<table>
<thead>
<tr>
<th>Subject Matter Field</th>
<th>Team Member</th>
</tr>
</thead>
<tbody>
<tr>
<td>Detainee Rights</td>
<td>Inspector 12</td>
</tr>
<tr>
<td>Security</td>
<td>Inspector 4</td>
</tr>
<tr>
<td>Medical Care</td>
<td>Inspector 17</td>
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<tr>
<td>Medical Care</td>
<td>Inspector 22</td>
</tr>
<tr>
<td>Safety</td>
<td>Inspector 34</td>
</tr>
</tbody>
</table>

Type of Inspection

This is a scheduled annual inspection, which is performed to determine overall compliance with the ICE PBNDS 2011 for Over 72 hour facilities. The facility received a rating of Meets Standards during the October 2020 inspection.

Inspection Summary

The Torrance County Detention Facility is currently accredited by:
- The American Correctional Association (ACA) – No
- The National Commission on Correctional Health Care (NCCHC) – No
- The Joint Commission (TJC) - No
- Prison Rape Elimination Act (PREA) - No

Standards Compliance

The following information is a summary of the standards that were reviewed and overall compliance that was determined as a result of the 2020 and 2021 compliance annual inspections:
<table>
<thead>
<tr>
<th>2020 Annual Inspection</th>
<th>2021 Annual Inspection</th>
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</thead>
<tbody>
<tr>
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<tr>
<td>Does Not Meet Standards</td>
<td>0</td>
</tr>
<tr>
<td>Repeat Finding</td>
<td>0</td>
</tr>
<tr>
<td>Not Applicable</td>
<td>1</td>
</tr>
<tr>
<td>Meets Standards</td>
<td>38</td>
</tr>
<tr>
<td>Does Not Meet Standards</td>
<td>1</td>
</tr>
<tr>
<td>Repeat Finding</td>
<td>0</td>
</tr>
<tr>
<td>Not Applicable</td>
<td>4</td>
</tr>
</tbody>
</table>

The inspection team identified twenty-two (22) deficient components in the following eight (8) standards:

- Environmental Health and Safety - 3
- Staff-Detainee Communication – 1
- Food Service – 12, two of which are Priority components
- Significant Self-Harm and Suicide Prevention - 1
- Telephone Access – 1
- Visitation – 2, both of which are Priority components
- Grievance System – 1, which is a Priority component
- Staff Training – 1, which is a repeat deficiency

**Facility Snapshot/Description**

The Torrance County Detention Center is a medium-security, multi-jurisdictional facility, owned and operated by CoreCivic. The facility is located in Estancia, New Mexico approximately fifty miles southeast of Albuquerque, New Mexico. The facility, which was constructed in 1990, has a rated capacity of 975 beds. The facility houses adult male detainees of all classification levels for ICE and the U.S. Marshals Service and male and female detainees for Torrance County. The total count on the first day of the inspection was 332 with 224 ICE detainees. During the inspection, an additional 196 ICE detainees were received by the facility. Detainees are classified by ICE before their arrival. ICE detainees are not housed with non-ICE detainees. The average length of stay for an ICE detainee was reported to be 39 days. Detainee telephone services and tablets are provided by Talton Communications, Inc. Food service is provided by Trinity Services Group. All other services are provided by CoreCivic. Detainees are not charged co-pay fees for medical, dental, or mental health services.

The facility encompasses a total of sixteen acres within the secure perimeter and an additional 624 acres surrounding the facility. There are two sixteen-foot-high chain link fences with two feet buried, that surround the perimeter, with an additional eight-foot-high interior fence in the recreation areas, and an electric stun fence. There is a triple roll of razor wire at the top of the inner perimeter fence. Central control maintains operational control over all exterior and interior security doors and gates. Camera monitors, which are monitored from central control, provide secondary visual observation to all zones and points of egress. The entire facility is equipped with sprinkler systems and electronically controlled and monitored security and safety systems.

There are five housing units divided into sub-sections for a total of eight separate living areas that are configured into cell and dormitory designs. Five of the living areas are further divided into four sub-sections containing either 38 or 40 beds each. Two dormitory living areas contain 75 beds each. Each living area has a common dayroom that is equipped with fixed table/chair units for detainees to eat their meals, play games, and gather for conversation. Electronic tablets are available for all detainees to send and receive emails, make telephone calls, play games, read books, participate in video visits, send re-
quests directly to facility staff and ICE/ERO personnel, and file grievances. Tablets include LexisNexis, the local handbook, and all posted announcements and bulletins.

Housing unit control centers provide direct supervision of unit living areas. Each cell contains direct communication to the unit control center via intercoms. The facility has a special management/restrictive housing unit. There were no ICE detainees housed in the unit during this inspection period.

The facility has a gymnasium and two outdoor yard areas. Outdoor recreational activities are available, including handball, basketball courts, and soccer. The gymnasium area has handball, basketball, universal weights, and volleyball. Housing units have board games, movies, and televisions.

A total of 25 detainees were interviewed by inspectors. Eleven interviews were informal and were conducted when inspectors visited the housing units. Fourteen interviews were conducted confidentially. Detainees who spoke Spanish were interviewed by a bilingual inspector. Two detainees stated they submitted sick call slips and had not been seen by medical staff. The Medical SME followed up on the complaints with medical staff. One detainee complained that he had been tested for COVID-19 twice. No other complaints were voiced. The detainees stated that the food was “okay”. The detainees stated that facility staff treated them with respect and that they felt safe at the facility. The detainees knew how to file a grievance and stated they received a facility handbook during the intake process. None of the detainees had contacted the OIG.

During the inspection, optimal compliance was found while reviewing the following standards: Special Management Unit and Telephone Access.

**Areas of Concern/Significant Observations**

It was noted that the current staffing level is at fifty percent of the authorized correctional/security positions. Staff is currently working mandatory overtime shifts.

**Standard 4.1 Food Service - Rated Does Not Meet Standard**

**Policy:** This Detention Standard ensures that detainees are provided a nutritionally balanced diet that is prepared and presented in a sanitary and hygienic food service operation.

**Finding:** During the inspection, numerous instances of sanitation and safety concerns were observed with food display and service; food preparation; food protection; and safety and sanitation. Eleven components, including two Priority components, were rated as Does Not Meet Standard.

**Recommendation:** Safety and sanitation should be improved to ensure that detainees are provided a nutritionally balanced diet that is prepared and presented in a sanitary and hygienic good service operation.

Priority Components rated Does Not Meet Standard.

**Standard 4.1 Food Service**

**Component #1- PRIORITY:** The food service program shall be under the direct supervision of an experienced food service administrator (FSA) who is responsible for:

- Planning, controlling, directing, managing, and evaluating food service;
- Managing budget resources;
• Establishing standards of sanitation, safety, and security;

• Developing nutritionally adequate menus and evaluating detainee acceptance of them;

• Developing specifications for the procurement of food, equipment, and supplies; and

• Establishing a training program that ensures operational efficiency and a high-quality food service program.

Finding: During this inspection, numerous sanitation and safety concerns were observed. Specifically, issues with food display and service; food preparation; food protection; and safety and sanitation

Recommendation: The facility should provide an increased level of supervision to the food service contractor to ensure a safe, sanitary, and hygienic food service operation.

Component #39 – PRIORITY: Staff shall check refrigerator and water temperatures daily and record the results. The FSA or designee will verify and document requirements of food and equipment temperatures.

Finding: During this inspection, the dishwashing machine was found to be operating at temperatures that did not meet minimum requirements to ensure dishes were cleaned and sanitized.

Recommendation: The facility should provide an increased level of supervision to the food service contractor to ensure a safe, sanitary, and hygienic food service operation.

Standard 5.7 Visitation

Component # 5 – PRIORITY: General visitation is permitted during set hours on Saturdays, Sundays, and holidays, and, to the extent practicable, the facility also establishes visiting hours on weekdays and during evening hours. The facility accommodates the scheduling needs of visitors for whom scheduled visiting hours pose a hardship. The number of visitors a detainee receives and the length of visits are limited only by reasonable constraints of space, scheduling, staff availability, safety, security, and good order.

Finding: General visitation has been suspended due to COVID-19 concerns. There is a video visitation option available on the electronic tablets available to detainees in the housing units; however, video visits are not free. Indigent detainees do not have access to general visitation. The facility has continued to provide legal visitation.

Recommendation: The facility should provide an equal opportunity for detainees to participate in general visitation without paying a fee.

Component #9 – PRIORITY: The facility’s written rules shall specify time limits for visits. Visits should be for the maximum period practicable but not less than one hour with special consideration given to family circumstances and individuals who have traveled long distances.

Finding: General visitation has been suspended due to COVID-19 concerns. There is a video visitation option available on the electronic tablets in the housing units; however, video visits are not free. Indigent detainees do not have access to general visitation. The facility has continued to provide legal visitation.
**Recommendation:** The facility should provide an equal opportunity for detainees to participate in general visitation without paying a fee.

**Standard 6.2 Grievance System**

**Component #11 - PRIORITY:** Each facility shall maintain a Detainee Grievance Log. The documentation shall include the date the grievance was filed, the name of the detainee that filed the grievance, the nature of the grievance, the date the decision was provided to the detainee, and the outcome of the adjudication. A copy of the grievance disposition shall be placed in the detainee’s detention file and provided to the detainee. Medical grievances are maintained in the detainee’s medical file.

**Finding:** During the current inspection it was determined that a copy of the grievance disposition was not placed in the detainee’s detention file, nor were medical grievances maintained in the detainee’s medical file.

**Recommendation:** The facility should amend policy and practice to ensure grievances are filed as required by the standard.

**Recommended Rating and Justification**

The Lead Compliance Inspector recommends that the facility receive a rating of Does Not Meet Standards. The facility does not comply with the ICE Performance-Based National Detention Standards (PBNDS 2011) unless unobserved practices and conditions are contrary to what was reported to the inspection team. One (1) standard was found Does Not Meet Standard and four (4) standards were Not Applicable (N/A). All remaining thirty-eight (38) standards were found to Meet Standards.

**LCI Assurance Statement**

The findings of compliance and non-compliance are accurately and completely documented on the G-324 Inspection Form and are supported by documentation in the inspection file. An out brief was conducted with the facility. In addition to the Nakamoto Group Inspection Team, the following participated:

- ICE Officials – SDDO Azucena Sanchez (telephonic)
- Facility staff – Facility Administrator George Dedos, Quality Assurance Manager (b)(6), Chief of Security (b)(6), (b)(7)(C), Chief of Unit Management (b)(6), (b)(7)(C), Captain (b)(6), (b)(7)(C), ISA (b)(6), (b)(7)(C), and Safety Manager (b)(6), (b)(7)(C), CoreCivic Regional Director, Health Services (b)(6), (b)(7)(C), participated telephonically.

Inspector 4, Lead Compliance Inspector July 29, 2021

Printed Name of LCI Date

Page 5 of 5  2022-ICLI-00045  4495
From: Guzman, Nicole G
Sent: Thu, 23 Dec 2021 14:55:41 +0000
To: Loiacono, Adam V
Subject: FW: Email Alert- Access to legal services for Haitian immigrants at Torrance County Detention Facility Letter
Attachments: FW: Innovation Law Lab Letter on Access to Legal Services for Haitian Nationals at Torrance Cover Letter sr, FW: Innovation Law Lab Letter on Access to Legal Services for Haitian Nationals at Torrance Cover Letter sr

FYI

Nicole G. Guzman
Deputy Principal Legal Advisor for General and Administrative Law
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
407.209.209 (mobile)

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From @ice.dhs.gov>
Sent: Thursday, December 23, 2021 9:55 AM
To: Guzman, Nicole G @ice.dhs.gov>
Subject: FW: Email Alert- Access to legal services for Haitian immigrants at Torrance County Detention Facility Letter

FYI!

Deputy Chief
Government Information Law Division
Office of the Principal Legal Advisor
Immigration and Customs Enforcement
500 12th St. SW, 4th Floor, Room 12E13
Washington, DC 20536
Office: 202-785-1000
Cell: 202-868-1000
Email: @ice.dhs.gov
Good morning,

Happy holidays. I will be the POC on this matter. I reviewed the email alert. I recommend [redacted].

Thank you,

Deputy Chief
Government Information Law Division
Office of the Principal Legal Advisor
Immigration and Customs Enforcement
500 12th St. SW, 9th Floor, Room 9194
Washington, DC 20536
Office: 202-732-5626
Cell: 202-868-9678
Email @ice.dhs.gov

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From @ice.dhs.gov>
Sent: Wednesday, December 22, 2021 11:47 AM
To: #OPLASCREmailAlerts @ice.dhs.gov>
Cc @ice.dhs.gov>

Subject: Email Alert- Access to legal services for Haitian immigrants at Torrance County Detention Facility Letter

Greetings,

(b)(5)
OPLA El Paso is working closely with ERO in order to draft a response to the requested information. OPLA El Paso will provide updates and written submissions for review as necessary. ACC and I will be the El Paso POC’s.

Respectfully,

[redacted]

Deputy Chief Counsel
Office of the Principal Legal Advisor, El Paso
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
11541 Montana Ave
El Paso, Texas 79936
(915) 857-857-857
FW: Innovation Law Lab Letter on Access to Legal Services for Haitian Nationals at Torrance Cover Letter

FYSA, I told ___ where we were, and she is good. Just let ___ know we have talked to her and the document is with the EAD’s office. Once we get clearance from the EAD office we can let them know.

This is not cleared for forwarding.

Acting Deputy Field Office Director
El Paso Field Office
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
Desk (915) 856

FW: Innovation Law Lab Letter on Access to Legal Services for Haitian Nationals at Torrance Cover Letter

Here is what we just discussed, not yet cleared please don’t forward, we will let you know once we here back.

___ is the Senior Advisor for Communications, she works for ___ he reached out directly to us to work on the response.

This is in reference to the same letter and tasking that ___ sent us. (attached email for reference)

Thank you

Acting Deputy Field Office Director
El Paso Field Office
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
Desk (915) 856
Subject: RE: Innovation Law Lab Letter on Access to Legal Services for Haitian Nationals at Torrance Cover Letter

Thank you!

Sent with BlackBerry Work
(www.blackberry.com)

Aside from two formatting corrections, I believe the questions are answered.
(b)(5)
(b)(5)
(b)(5)
Good evening ERO ELP,

Please see the attachment and provide an input in the draft response.

Due date tomorrow 11/16/2021 by 12:00pm EST.

Thank you.

DDO, Domestic Operations - West
HQ Field Operations Division
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
Cell: 404-734-0996
500 12th St, SW
Washington, DC 20024
November 5, 2021

Field Office Director Juan Acosta

Assistant Field Office Director

Immigration and Customs Enforcement
El Paso Field Office
11541 Montana Ave
El Paso, TX 79936

Via e-mail

Supervisory Detention and Deportation Office

Supervisory Detention and Deportation Office

Immigration and Customs Enforcement
Torrance County Detention Facility
209 County Road A049
Estancia, NM 87016

Via e-mail

Re: Access to legal services for Haitian immigrants at Torrance County Detention Facility

Mr. Acosta,
We appreciate your prompt attention to our request and can provide additional information as needed.

Sincerely,

**INNOVATION LAW LAB**

Legal Director

(971) 277-\text{[redacted]}

Deputy Legal Director

(352) 559-\text{[redacted]}

**NATIONAL IMMIGRATION PROJECT**

Senior Staff Attorney

(504) 264-\text{[redacted]}

Staff Attorney

(202) 470-\text{[redacted]}
ACLU OF NEW MEXICO

Legal Director

Senior Staff Attorney

HAITIAN BRIDGE ALLIANCE

Legal Director

AMERICAN IMMIGRATION COUNCIL

Legal Director
From: b(6), b(7)(C)
Sent: Wednesday, November 17, 2021 4:10 PM
To: b(6), b(7)(C)
Subject: FW: Innovation Law Lab Letter on Access to Legal Services for Haitian Nationals at Torrance Cover Letter
Attachments: Innovation Law Lab Letter on Access to Legal Services for Haitian Nationals at Torrance Cover Letter.docx

FYSA, I told them where we were, and she is good. Just let us know we have talked to her and the document is with the EAD’s office. Once we get clearance from the EAD office we can let them know.

This is not cleared for forwarding.

Acting Deputy Field Office Director
El Paso Field Office
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
Desk (915) 856-60 (6), b(7)(C)

From: b(6), b(7)(C)
Sent: Wednesday, November 17, 2021 4:41 PM
To: ice.dhs.gov
Subject: FW: Innovation Law Lab Letter on Access to Legal Services for Haitian Nationals at Torrance Cover Letter

Here is what we just discussed, not yet cleared please don’t forward, we will let you know once we here back.

The Senior Advisor for Communications, she works for CoS Bernacke, she reached out directly to us to work on the response.

This is in reference to the same letter and tasking that sent us. (attached email for reference)

Thank you

Acting Deputy Field Office Director
El Paso Field Office
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
Desk (915) 856-60 (6), b(7)(C)
From: @ice.dhs.gov
Sent: Wednesday, November 17, 2021 4:31 PM
To: @ice.dhs.gov
Cc: @ice.dhs.gov
Subject: RE: Innovation Law Lab Letter on Access to Legal Services for Haitian Nationals at Torrance Cover Letter

Thank you!

Sent with BlackBerry Work
(www.blackberry.com)

From: @ice.dhs.gov
Date: Wednesday, Nov 17, 2021 6:23 PM
To: @ice.dhs.gov
Cc: @ice.dhs.gov
Subject: Innovation Law Lab Letter on Access to Legal Services for Haitian Nationals at Torrance Cover Letter

Aside from two formatting corrections, I believe the questions are answered.
Tae D. Johnson
Acting Director
From: [Redacted]
Sent: Mon, 15 Nov 2021 23:24:40 +0000
To: [Redacted]
Cc: [Redacted]
Subject: *** short turn around ** FW: Draft Response -21-11634- Jordan Cunnings wrote to ICE regarding Access to legal services for Haitian immigrants at Torrance County Detention Facility ICATT:0045133 (ELP)
Attachments: TorranceLetter_11.5.21.pdf, 21-11634 Cunnings re legal services for Haitians at Torrance County Detention Facility.docx

Good evening ERO ELP,

Please see the attachment and provide an input in the draft response.

**Due date tomorrow 11/16/2021 by 12:00pm EST.**

Thank you.

[Redacted]

DDO, Domestic Operations - West
HQ Field Operations Division
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
Cell: 404-734- [Redacted]
500 12th St, SW
Washington, DC 20024
From: 
To: 
Subject: FW: Innovation Law Lab Letter on Access to Legal Services for Haitian Nationals at Torrance Cover Letter
Attachments: Innovation Law Lab Letter on Access to Legal Services for Haitian Nationals at Torrance Cover Letter docx, *** short turn around ** FW: Draft Response -21-11634 wrote to ICE regarding Access to legal services for Haitian immigrants at Torrance County Detention Facility ICATT:0045133 (ELP)

FYSA, I told where we were, and she is good. Just let know we have talked to her and the document is with the EAD's office. Once we get clearance from the EAD office we can let them know.

This is not cleared for forwarding.

Acting Deputy Field Office Director
El Paso Field Office
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
Desk (915) 856-

From: 
Sent: Wednesday, November 17, 2021 4:41 PM
To: @ice.dhs.gov
Subject: FW: Innovation Law Lab Letter on Access to Legal Services for Haitian Nationals at Torrance Cover Letter

Here is what we just discussed, not yet cleared please don't forward, we will let you know once we here back.

the Senior Advisor for Communications, she works for CoS Bernacke, she reached out directly to us to work on the response.

This is in reference to the same letter and tasking that sent us. (attached email for reference)

Thank you

Acting Deputy Field Office Director
El Paso Field Office
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
Desk (915) 856-
Thank you!

Sent with BlackBerry Work
(www.blackberry.com)

Aside from two formatting corrections, I believe the questions are answered.
Tae D. Johnson
Acting Director

www.ice.gov
From: (b)(6); (b)(7)(C)
Sent: Mon, 15 Nov 2021 23:24:40 +0000
To: (b)(6); (b)(7)(C)
Cc: (b)(6); (b)(7)(C)
Subject: *** short turn around ** FW: Draft Response -21-11634 (b)(6); (b)(7)(C)
wrote to ICE regarding Access to legal services for Haitian immigrants at Torrance County Detention Facility ICATT:0045133 (ELP)
Attachments: TorranceLetter_11.5.21.pdf, 21-11634 Cunnings re legal services for Haitians at Torrance County Detention Facility.docx

Good evening ERO ELP,

Please see the attachment and provide an input in the draft response.

**Due date tomorrow 11/16/2021 by 12:00pm EST.**

Thank you.

(b)(6); (b)(7)(C)

DDO, Domestic Operations - West
HQ Field Operations Division
**Enforcement and Removal Operations**
**U.S. Immigration and Customs Enforcement**
Cell: 404-734 (b)(6)
500 12th St, SW
Washington, DC 20024
(b)(6); (b)(7)(C); (b)(5)
Will do.

Best,
Ken Padilla
Deputy Principal Legal Advisor for Field Legal Operations
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
(202) 732-1818 (office)/(646) 789-2801 (mobile)

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No need. Please just [b][5] Thanks!

From: Padilla, Kenneth [b][6] [b][7][C] @ice.dhs.gov
Sent: Friday, February 18, 2022 2:59 PM
To: Davis, Mike P [b][6] [b][7][C] @ice.dhs.gov

See below. Do you want [b][6] [b][7][C] [b][5]? 

Best,

Ken Padilla
Deputy Principal Legal Advisor for Field Legal Operations
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security

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From: Padilla, Kenneth [b][6] [b][7][C] @ice.dhs.gov
Sent: Friday, February 18, 2022 2:58 PM
To: Padilla, Kenneth [b][6] [b][7][C] @ice.dhs.gov
Ken,

Thanks,

Chief Counsel
Office of the Principal Legal Advisor, El Paso
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security

To register for eService, please go to https://eserviceregistration.ice.gov/

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***SENSITIVE/PRIVILEGED***PRE-DECISIONAL***ATTORNEY WORK PRODUCT***

From: Padilla, Kenneth
Sent: Friday, February 18, 2022 12:56 PM
To: @ice.dhs.gov
Best,

Ken Padilla
Deputy Principal Legal Advisor for Field Legal Operations
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
(202) 732-____ office)/(646) 789-____ mobile

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and Customs Enforcement. This document is for INTERNAL GOVERNMENT USE ONLY
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(b)(7).

From: @ice.dhs.gov
Sent: Friday, February 18, 2022 2:45 PM
To: Padilla, Kenneth @ice.dhs.gov

Hello, Ken.

Checking on that.

But still checking. Please stand by,
Chief Counsel
Office of the Principal Legal Advisor, El Paso
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security

To register for eService, please go to https://eserviceregistration.ice.gov/

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***SENSITIVE/PRIVILEGED***PRE-DECISIONAL***ATTORNEY WORK PRODUCT***

From: Padilla, Kenneth [b](6); [b](7)(C) @ice.dhs.gov
Sent: Friday, February 18, 2022 12:35 PM
TQ [b](6); [b](7)(C) @ice.dhs.gov

Hello [b](6);

See below. Is there [b](5)

Best,
Ken Padilla  
Deputy Principal Legal Advisor for Field Legal Operations  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
U.S. Department of Homeland Security  
(202) 73 b(6), office)/(646) 789- b(6), mobile)  

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and Customs Enforcement. This document is for INTERNAL GOVERNMENT USE ONLY  
and may be exempt from disclosure under the Freedom of Information Act, 5 USC §§ 552(b)(5),  
(b)(7).

From: Davis, Mike [b(6), b(7)]  
Sent: Friday, February 18, 2022 2:05 PM  
To: Padilla, Kenneth [b(6), b(7)]  
Cc: Loiacono, Adam [b(6), b(7)]  

Ken – would you mind [b(5)]  

[b(5)] Thanks!

From: Davis, Mike P  
Sent: Friday, February 18, 2022 2:04 PM  
To: Doyle, Kerry [b(6), b(7)]  
Cc: Loiacono, Adam [b(6), b(7)]  
Privileged

Kerry E. Doyle  
Principal Legal Advisor  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
U.S. Department of Homeland Security  
Office: 202-224-3519  
Cell: 202-51******

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From: Doyle, Kerry  
Sent: Friday, February 18, 2022 1:59 PM  
To: Davis, Mike P  
Loiacono, Adam V  

From: Doyle, Kerry  
Sent: Friday, February 18, 2022 1:49 PM  
To: Davis, Mike P  
Loiacono, Adam V  

2022-ICLI-00045 4537
Dear Counsel:

On January 13, 2022, this office was served with a copy of the enclosed summons and complaint in the above-captioned case. This case has been assigned to Assistants United States Attorneys (copied to this email). Our Answer or dispositive motion is due on March 14, 2022.

Regards,

Paralegal Specialist
U.S. Attorney’s Office, Civil Division
(202) 252-5555 Fourth Street, N.W.
Washington, DC 20530
From: Davis, Mike P
Sent: Fri, 18 Feb 2022 19:59:41 +0000
To: Padilla, Kenneth

No need. Please just Thanks!

From: Padilla, Kenneth
Sent: Friday, February 18, 2022 2:59 PM
To: Davis, Mike p

See below. Do you want ?

Best,
Ken Padilla
Deputy Principal Legal Advisor for Field Legal Operations
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
(202) 732-(office)/(646) 789-(mobile)

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(b)(5); (b)(4)
(b)(5); (b)(4)
(b)(5); (b)(4)
(b)(5); (b)(4)
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(b)(5); (b)(4)
(b)(5); (b)(4)
(b)(5)
(b)(5)
Detention Contracts and Intergovernmental Agreements
(b)(5)
(b)(5); (b)(7)(C); (b)(6)
(b)(5)
(b)(5)
Subject: RE: [EXTERNAL] Fraihat

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Thank you.

I’ve followed up with them, but I understand that both options are still on the table for them.

One element that we discussed re this proposal (which we haven’t seen yet), would be agreeing to permit ICE some additional time regarding initial screening and custody determinations (although they indicated that something like 60 days to complete a custody redetermination would be too long).

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-
Are Plaintiffs still working on a proposal to potentially not pursue en banc if ICE agrees to some form of status quo (based on your previous email re the pros and cons of another extension), or is this request for another extension an indication that they decided not to propose a proposal like that?

Kind regards,

--- ATTORNEY/CLIENT PRIVILEGE --- ATTORNEY WORK PRODUCT ---

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Subject: Re: [EXTERNAL] Faihat

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Please see below opposing counsel's ask for our position on a further en banc extension by COB Monday. I’ve already responded to indicate that we may not be able to get back to them by then. I also don’t[5]

[5]

Please let me know what ICE and DHS think so I can send some response by Monday.

If we are going to file another consent extension, we really need to do so ASAP. [b][6] tells me that you are still waiting for you’re the agency’s final views. We very much appreciate your efforts in getting an answer. Given the last 9th Circuit order, we will need to be able to tell the Court we are making substantial progress in the negotiations. I would be helpful for you to provide us language you would be comfortable with. And let us know whether you will agree to seeking another 60, or would only agree to 45 or 30.

Could you please get back to us by Monday COB? I feel like we are already late in filing this and want to get it done, if we can.

Thanks,

Sent from my iPhone

On May 13, 2022, at 12:22 PM, [b][6] wrote:


In short, the decision on whether to agree to jointly seek a further extension of Plaintiffs’ en banc deadline is closely tied to (b)(5).
Deputy Director  
Office of Immigration Litigation  
District Court Section  
(202) 616-  

From: (b)(6); (b)(7)(C)  
Sent: Friday, May 13, 2022 9:03 AM  
To: (b)(6); (b)(7)(C)  
Cc: (b)(6); (b)(7)(C); (b)(6); (b)(7)(C)  
Subject: Re: [EXTERNAL] Faihat  

Apologies again for the delay. We will get this to you this afternoon.  

Sent from my iPhone  

On May 10, 2022, at 2:12 PM, (b)(6); (b)(7)(C) wrote:  

Good afternoon (b)(6);  
Following up on (b)(6); previous request, do you have an estimate on when we can expect OII’s thoughts on agreeing, or not agreeing, to another extension to file the en banc review?  

Thanks in advance,  

(b)(6);  

Acting Deputy Chief, on detail
https://eserviceregistration.ice.gov/

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From: (b)(6); (b)(7)(C) @usdoj.gov
Sent: Friday, May 6, 2022 12:55 PM
To: (b)(6); (b)(7)(C) @ice.dhs.gov

Subject: RE: [EXTERNAL] Fraihat
Thanks (b)(6).

I’ll pass that along and we’ll get you something today.

---

From (b)(6); (b)(7)(C) @ice.dhs.gov

Sent: Friday, May 06, 2022 12:52 PM

To: (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @hq.dhs.gov;

Cc: (b)(6); (b)(7)(C) @usdoj.gov;

Subject: RE: [EXTERNAL] Fraihat

Hi (b)(6);

ICE could be available for the next mediation session on May 23 from 3-5pm ET. Additionally, we are working to have our responses to Plaintiffs’ proposal to OIL by May 10.

Lastly to follow up, is OIL able to provide any pros and cons on possibly agreeing to another extension to file the en banc petition?

Thank you!

(b)(6); (b)(7)(C)
We’ll get you pros and cons re a further extension today.
Thanks,

(b)(6); (b)(7)(C)

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: (b)(6); (b)(7)(C) @ice.dhs.gov
Sent: Monday, May 02, 2022 9:08 AM
To: (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @hq.dhs.gov;
Cc: (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov;
(b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; Padilla, Kenneth (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) PHQ.DHS.GOV; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; @usdoj.gov; (b)(6);
(b)(6); (b)(7)(C) @usdoj.gov; @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov;
(b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov;
Loiacono, Adam V (b)(6); (b)(7)(C) @ice.dhs.gov; Davis, Mike P (b)(6); (b)(7)(C) @ice.dhs.gov;
Subject: RE: [EXTERNAL] Fraihat
Thank you, we are trying to see which of those slots may work.

In the meantime, can OIL provide insights on the pros and cons for agreeing to another extension for plaintiffs to file a petition en banc for ICE to consider as we elevate?

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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I’m looping [b][6][b][7][c] who may be plugging into this case after today and until a new immigration deputy comes onboard.

(b)[6][b][7][c]
Deputy General Counsel
U.S. Department of Homeland Security

(202) 834-3

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From: (b)[6][b][7][c]@usdoj.gov
Sent: Thursday, April 28, 2022 3:49 PM
To: (b)[6][b][7][c]@ice.dhs.gov
Cc: (b)[6][b][7][c]@usdoj.gov (b)[6][b][7][c]@ice.dhs.gov

(b)[6][b][7][c]@ice.dhs.gov
(b)[6][b][7][c]@usdoj.gov
(b)[6][b][7][c]@hq.dhs.gov
(b)[6][b][7][c]@ice.dhs.gov
(b)[6][b][7][c]@ice.dhs.gov

Subject: RE: [EXTERNAL] Friaht

So that attempt at scheduling didn’t work. Here’s Plaintiffs’ response.

Any chance we can work with their hours on 5/17, and if not, what works for ICE the following week?

We can meet between 10:30 and 2:00 Pacific on 5/17. I also should clarify that, based on our previous meetings, we’re working under the assumption that this would be a two-hour session.
In the event the 5/17 times won’t work, our availability the week of May 23 is as follows (all times Pacific):

May 23: any time in the afternoon  
May 24: 1:00p – 3:00p  
May 25: 9:00a – noon  
May 26: 11:30a – 2:00p  
May 27: 10:30a – 4:00p

---

From: [email]  
Sent: Tuesday, April 26, 2022 9:47 AM  
To: [email]  
Cc: [email]  
Bcc: [email]  
Subject: RE: [EXTERNAL] Fraihat

Hi [b](6):  

Yes, we will work to have the proposal to OIL by 5/11 and we will work on a position on another potential extension of the deadline for Plaintiffs’ to file a petition en banc.

Regarding the next mediations session, ICE’s availability is below.

- Monday (May 16)  
- Tuesday between 10 and 2 (May 17)
Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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From: (b)(6); (b)(7)(C)@usdoj.gov

Sent: Friday, April 22, 2022 12:03 PM

To: (b)(6); (b)(7)(C)@ice.dhs.gov

Cc: (b)(6); (b)(7)(C)@usdoj.gov, (b)(6); (b)(7)(C)@hq.dhs.gov;

Subject: Re: [EXTERNAL] Fraihat
Thank you.

Will ICE prepared to have your thoughts to us by the 11th?

And can ICE and DHS get together on views on a further extension of the en banc deadline, which is coming up again in June (so we’re likely going to be asked for our position before we sit down with the mediator again).

Sent from my iPad

On Apr 22, 2022, at 11:21 AM, (b)(6); (b)(7)(C)@ice.dhs.gov wrote:

Hi

ICE request that the mediation session be the third week of May (week of May 16), given the amount of review the proposal would need and in order to have the most productive mediation session. We are gathering availability so we can propose the dates.

Kind regards,

(b)(6); (b)(7)(C)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253

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From (b)(6); (b)(7)(C)@usdoj.gov
Sent: Friday, April 22, 2022 11:00 AM
Subject: RE: [EXTERNAL] Faihat

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ICE, does this proposed timeline work for you? I’d like to confirm with opposing counsel and the Magistrate Judge, thanks.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From:

Sent: Tuesday, April 19, 2022 12:27 PM

To:

Cc:

(202) 616-
Subject: RE: [EXTERNAL] Faihath

As a suggestion, if we were to propose a day to meet with Plaintiffs the week of May 9, we could build in a few more days for ICE to develop a response – say by May 3, which we could review/discuss and send over to Plaintiffs by May 6.

(b)(6); (b)(7)(C)

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From (b)(6); (b)(7)(C) @ice.dhs.gov;
Sent: Tuesday, April 19, 2022 12:23 PM
To: (b)(6); (b)(7)(C) @usdoj.gov;
Cc: (b)(6); (b)(7)(C) @hq.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ace.dhs.gov;
(b)(6); (b)(7)(C) @ace.dhs.gov;
(b)(6); (b)(7)(C) @ace.dhs.gov;

Padilla, Kenneth (b)(6); (b)(7)(C) @ace.dhs.gov;
(b)(6); (b)(7)(C) @ace.dhs.gov;
(b)(6); (b)(7)(C) @ace.dhs.gov;
(b)(6); (b)(7)(C) @ace.dhs.gov;
(b)(6); (b)(7)(C) @ace.dhs.gov;
(b)(6); (b)(7)(C) @ace.dhs.gov;

Subject: RE: [EXTERNAL] Faihath

Okay, thank you. ICE is considering if the timeline is feasible and will follow up.

Kind regards,

(b)(6);

(b)(6); (b)(7)(C)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW

2022-ICLI-00045 5327
Washington, D.C. 20536
Mobile: (202) 253-

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From: (b)(6); (b)(7)(C) @usdoj.gov
Sent: Tuesday, April 19, 2022 11:55 AM
To: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov
Cc: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov
(b)(6); (b)(7)(C) @ice.dhs.gov; Padilla, Kenneth (b)(6); (b)(7)(C) @ice.dhs.gov
(b)(6); (b)(7)(C) @HQ.DHS.GOV; (b)(6); (b)(7)(C) @ice.dhs.gov
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov
(b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov
(b)(6); (b)(7)(C) @ice.dhs.gov; Davis, Mike P (b)(6); (b)(7)(C) @ice.dhs.gov
(b)(6); (b)(7)(C) @ice.dhs.gov; Loiacono, Adam V
Subject: RE: [EXTERNAL] Fraihat

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Under Plaintiffs’ proposed timeline, we would need ICE’s responses sent to OIL by the 29th to give us a few days to review and clarify with ICE, to then transmit to opposing counsel sometime during the following week of May 2, in time for a mediation session that week. It’s an ambitious timeline to say the least.

Best,
(b)(6); (b)(7)(C)

From: (b)(6); (b)(7)(C) @ice.dhs.gov
Sent: April 19, 2022 11:48 AM

2022-ICLI-00045  5328
Hi [b](b)(7)(C)

Thank you for sending. Would the goal be to have ICE’s responses sent to OIL by April 29 or to Plaintiffs by April 29, so to OIL a few days before then?

Kind regards,

[b](b)(6)

[b](b)(7)(C)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253- [b](b)(6)

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From: (b)(6); (b)(7)(C) @usdoj.gov
Sent: Tuesday, April 19, 2022 11:20 AM
To: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov
Cc: (b)(6); (b)(7)(C) @hq.dhs.gov

Subject: RE: [EXTERNAL] Fraihat

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Thank you,
(b)(6); (b)(7)(C)

From: (b)(6); (b)(7)(C) @ice.dhs.gov
Sent: April 15, 2022 5:43 PM
To: (b)(6); (b)(7)(C) @ice.dhs.gov
Cc: (b)(6); (b)(7)(C) @hq.dhs.gov

2022-ICLI-00045 5330
Hi

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-__

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2022-ICLI-00045 5331
From: (b)(6); (b)(7)(C) @usdoi.gov
Sent: Wednesday, April 13, 2022 2:33 PM
To: (b)(6); (b)(7)(C) @ice.dhs.gov
Cc: (b)(6); (b)(7)(C) @hq.dhs.gov
(b)(6); (b)(7)(C) @ice.dhs.gov
(b)(6); (b)(7)(C) @usdoi.gov
Subject: RE: [EXTERNAL] Fraihat

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Folks,

Please note that we still owe opposing counsel a response regarding the process for negotiating the claims in the complaint itself. I’ve made a verbal suggestion of what our response could look like to (b)(6) but we haven’t heard further from ICE.

Relatedly, I expect that (b)(5)

(b)(5)

From: (b)(6); (b)(7)(C)
Sent: Thursday, April 07, 2022 2:25 PM
To: [ice.dhs.gov]
Cc: [ice.dhs.gov] [ice.dhs.gov] [ice.dhs.gov] [ice.dhs.gov] [ice.dhs.gov] [ice.dhs.gov]

Subject: RE: [EXTERNAL] Fraitah

Thank you.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: [ice.dhs.gov]
Sent: Thursday, April 07, 2022 10:05 AM
To:
Cc:
Hi [b](6):

Please find below further information from ERO concerning the detainee [b](6); [b](7)(C)

Apologies for the delay.

[b](5); [b](6); [b](7)(C)

[b](5); [b](6); [b](7)(C)

Please let us know if you have any additional questions. Thank you.

Sincerely,

[b](6); [b](7)(C)
Associate Legal Advisor
Department of Homeland Security
Immigration and Customs Enforcement
Office of the Principal Legal Advisor—District Court Litigation Division
500 12th Street SW [b](6); [b](7)(C)
Washington, D.C. 20536
Mobile Phone: [b](8); [b](7)(C)

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Hi [b](6):

Regarding this individual, based on the information we have so far, it appears that ICE did receive Fraihat release requests, as alleged by plaintiffs. We have requested additional information from ERO. As soon as we receive it, we will pass that along.

Thank you very much.

Sincerely,

[b](6); (b)(7)(C)
Associate Legal Advisor
Department of Homeland Security
Immigration and Customs Enforcement
Office of the Principal Legal Advisor—District Court Litigation Division
500 12th Street SW [b](6); (b)(7)(C)
Washington, D.C. 20536

[b](6); (b)(7)(C) **Warning** Law Enforcement Sensitive **Confidential**
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From: [b](6); (b)(7)(C) @usdoj.gov
Sent: Thursday, March 31, 2022 6:51 PM
To: [b](6); (b)(7)(C) @ice.gov
Cc: [b](6); (b)(7)(C) @ice.dhs.gov; [b](6); (b)(7)(C) @usdoj.gov
Subject: Re: [EXTERNAL] Fraihat

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Thanks. Any details about what happened here?

Sent from my iPhone

On Mar 31, 2022, at 5:25 PM, [b](6); (b)(7)(C) @ice.dhs.gov wrote:

Hi OIL,

Per ERO, this individual is being released from ICE custody today. Attached is the I-831.

Thank you.

[b](6); (b)(7)(C)
Associate Legal Advisor
Department of Homeland Security
Immigration and Customs Enforcement
Office of the Principal Legal Advisor—District Court Litigation Division
500 12th Street SW  
Washington, D.C. 20536  
Mobile Phone @usdoj.gov

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From: @usdoj.gov  
Sent: Tuesday, March 29, 2022 3:35 PM  
To: @ice.dhs.gov, @hq.dhs.gov, @usdoj.gov; 
Cc: @ice.dhs.gov, @hq.dhs.gov, @usdoj.gov; 
Subject: RE: [EXTERNAL] Fraihat

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Please find attached one additional allegation of Fraihat noncompliance, for which Plaintiffs request a response by March 31. The detainee reference in this email is listed at Row 33900 of the latest bi-weekly production, and reflects a custody determination having occurred in August 2021.

(b)(5)
and may be exempt from disclosure under the Freedom of Information Act, 5 USC §§ 552(b)(5), (b)(7).

From: [redacted]
Sent: Friday, February 18, 2022 2:58 PM
To: Padilla, Kenneth [redacted]

Ken,

[redacted]

Thanks,

[redacted]

Chief Counsel
Office of the Principal Legal Advisor, El Paso
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security

To register for eService, please go to https://eserviceregistration.ice.gov/

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From: Padilla, Kenneth @ice.dhs.gov
Sent: Friday, February 18, 2022 12:56 PM
T"c

Thank

Best,
Ken Padilla
Deputy Principal Legal Advisor for Field Legal Operations
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
(202) 732- (office)/(646) 789- (mobile)

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From: @ice.dhs.gov
Sent: Friday, February 18, 2022 2:45 PM
Hello, Ken.

Checking on that. But still checking. Please stand by,

Chief Counsel
Office of the Principal Legal Advisor, El Paso
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security

To register for eService, please go to https://eserviceregistration.ice.gov/

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***SENSITIVE/PRIVILEGED***PRE-DECISIONAL***ATTORNEY WORK PRODUCT***

From: Padilla, Kenneth
Sent: Friday, February 18, 2022 12:35 PM
To: @ice.dhs.gov

Hello,

See below.

Best,
Ken Padilla
Deputy Principal Legal Advisor for Field Legal Operations
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
(202) 732-1856 (office)/(646) 789-8894 (mobile)

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From: Davis, Mike P @ice.dhs.gov
Sent: Friday, February 18, 2022 2:05 PM
To: Padilla, Kenneth @ice.dhs.gov
Cc: Loiacono, Adam @ice.dhs.gov
Ken – would you mind asking...? Thanks!

From: Davis, Mike P
Sent: Friday, February 18, 2022 2:04 PM
To: Doyle, Kerry; Loiacono, Adam

I think so, but let me just have Ken...
From: Doyle, Kerry
Sent: Friday, February 18, 2022 1:49 PM
To: Davis, Mike P; Loiacono, Adam V

 PRIVILEGED

Kerry E. Doyle
Principal Legal Advisor
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
Office: 202-732-1668
Cell: 202-510-1668

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From: (USADC) [Contractor]
Sent: Tuesday, February 15, 2022 12:06 PM
To: Doyle, Kerry
Cc: [DHHS] [Contractor]
Subject: Haitian Bridge Alliance, et al. v. Joseph R. Biden, et al., Civil Action No. 21-3317 (EGS)

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Dear Counsel:

On January 13, 2022, this office was served with a copy of the enclosed summons and complaint in the above-captioned case. This case has been assigned to Assistants United States Attorney and (copied to this email). Our Answer or dispositive motion is due on March 14, 2022.
Regards,

[Redacted] Paralegal Specialist
U.S. Attorney’s Office, Civil Division
(202) 252-5554 555 Fourth Street, N.W.
Washington, DC 20530
From: Loiacono, Adam V
Sent: Wed, 30 Mar 2022 14:29:07 +0000
To: [Redacted]
Cc: Loiacono, Adam V
Subject: Accepted: Internal Prep for a Torrance Stakeholder Meeting
Press Release

Mar. 4: Francisco B. Burrola selected special agent in charge of ICE HSI El Paso
Mar. 8: ICE HSI investigation leads to 50-year federal prison sentence for child exploitation crimes
Mar. 8: Previously convicted felon pleads guilty to bomb threat against a federal agency and illegally possessing a firearm after ICE HSI investigation

Press

HSI – Houston: HSI Houston speaks during National Consumer Protection Week event, Texas Senior Medicare Patrol
On March 8, HSI Houston Group Supervisor Tony Gregory spoke to attendees during a virtual Texas Senior Medicare Patrol “Fight back against fraud” event for National Consumer Protection Week about how to protect themselves from mass marketing and identity theft scams. Various local media outlets were scheduled to attend the event. 

HSI – KC: Nebraska man sentenced to 156 months for child porn, USAO press release
PAO flipped USAO press release concerning Bryan Morse, 61, of Chadron, Nebraska, who was sentenced Friday in Lincoln for possession of child pornography. United States District Judge John M. Gerrard sentenced Morse to 156 months’ imprisonment following a U.S. Immigration and Customs Enforcement (ICE) Homeland Security Investigations (HSI) probe. HSI Special Agent in Charge Katherine Greer and United States Attorney Jan Sharp made the announcement. PAO will post to social media as well.

ER0 – Harlingen: HPR to Mexico, News Release
ICE ERO Harlingen issued the approved news release regarding the HPR removal of Rafael Silverio Rojas Estefania to Mexico. He is wanted for homicide. The news release has been posted to ICE.gov. PAO is also amplifying message on social media.

ER0 – Philadelphia: Reporter seeking ERO Philadelphia reaction to protest held today at Berks County detention facility, in Berks County, Pennsylvania, NBC 10/Telemundo 62 (Isabel Sanchez)
PAO declined comment, provided most recent, OPA HQ-cleared statement describing current status of agency usage of facility, which ceased serving as a family detention center in January and currently houses adult, female noncitizens only.

HSI – Nashville: ICE HSI investigation leads to 50-year federal prison sentence for child exploitation crimes (USAO release …Flipped for ICE.gov)
of Louisville, Kentucky, was sentenced to 50 years in prison followed by a life term of supervised release for production and possession of child exploitation material. According to court documents, he sexually assaulted a minor female victim on more than 100 occasions, over the course of several years, beginning when the victim was only 11 years old. He recorded the abuse with cameras in his bedroom and via his cell phone. His wife transported the minor victim to his residence for him to have sexual contact with the victim in return for providing his wife with cash and drugs. ICE.gov release amplified on social media. SAC quote was included in both USAO and ICE.gov release.

HSI – Nashville: Previously convicted felon pleads guilty to bomb threat against a federal agency and illegally possessing a firearm after ICE HSI investigation (USAO release). The defendant pleaded guilty in U.S. District Court to communicating a threat against a federal agency and for being a felon in possession of a firearm. In April 2021, he made a threat to blow up the U.S. Social Security Administration (SSA) office in Memphis. An ensuing HSI and SSA OIG investigation found him to be a convicted felon, who was in possession of a firearm and ammunition. USAO release was flipped and submitted for publication on ICE.gov and amplification on social media. SAC quote was included in USAO release.

HSI – San Diego: Multiple individuals extradited to U.S.
PAO submitted multiple USAO flipped news releases regarding the extradition of six individuals to the U.S. to stand trial for various crimes related to international drug trafficking. The news releases contain quotes from HSI San Diego SAC C. Plantz.

ER0 – Detroit: Immigration status on Turkish national, WTOL 11 Toledo (Silas Tsang)
PAO received query via ICEMedia from Toledo reporter Silas Tsang. Reporter is seeking immigration status on Turkish national who allegedly fled the country after raping an Ohio woman. DFOD advised that ICE has not encountered this individual. PAO responding to reporter.

HSI – Detroit: Grand Rapids
Possible coverage of HSI Cadet Academy. Junior and Senior High school students in the law enforcement program have the opportunity to see what it’s like to become HSI agents for the week. PAO coordinating with Kent County School District PIO and pitching story to reporter for March 18th. PAO will share reporter story on twitter when posted.

ER0 – Tampa: Lawsuit filed against Marion County Sheriff’s office, Univision Interactive (Isaias Alvarado)
Reporter Isaias Alvarado reached out regarding a lawsuit filed on the behalf of a Jamaican national with legal status in the country. It is alleged that the Marion County Sheriffs office kept him in custody because they believed he was in the country illegally. The lawsuit does not name ICE as a defendant, the lawsuit does states that Brooks was in the country lawfully and it was confirmed by an ICE officer. Reporter requested a statement because of the working relationship with ERO. PAO spoke to local ERO management and told the reporter that he needed to reach out to the Sheriffs office since ICE is not a defendant in the lawsuit.
HSI – Miami: Two Venezuelan prosecutors indicted on money, Miami Herald (Jay Weaver) and EVTV (Carla Angola)
PAO reached out Jay Weaver and Carla Angola regarding the indictment of both senior national prosecutors in an anti-corruption unit of the Venezuelan Attorney General’s office. Both are charged with conspiracy to commit money laundering, engaging in transactions in criminally derived property and accepting bribes of over one million dollars. The defendants are not in custody and are believed to be in Venezuela. Both reporters have covered our ongoing Venezuelan corruption cases.

HSI – San Diego: Suspected Ecuadorian drug trafficker extradited to San Diego for conspiracy to distribute cocaine, AUSAO flipped news release
PAO submitted a flipped AUSAO news release regarding the Feb. 11 extradition of the owner of multiple Ecuadorian flagged vessels which allegedly provided logistical support to drug laden vessels, was extradited to the United States from Spain. A federal grand jury indicted and others, with participating in a long-running conspiracy to traffic substantial quantities of cocaine from South America to the United States. The news release contains a quote from HSI San Diego SAC C. Plantz, which will be used in a tweet on social media, per SAC approval.

HSI – San Diego: Suspected Guatemalan drug trafficker extradited to the US, AUSAO flipped news release
PAO submitted a flipped AUSAO news release regarding the Feb. 10 extradition of a Guatemalan national who was extradited to the United States from Guatemala to face international cocaine trafficking and maritime smuggling. is charged with operating a conspiracy to distribute five kilograms and more of cocaine in Colombia, Ecuador, Guatemala, Costa Rica, El Salvador, Mexico and elsewhere, knowing and intending that the cocaine would be unlawfully imported into the United States. The news release contains a quote from HSI San Diego SAC C. Plantz, which will be used in a tweet on social media, per SAC approval.

HSI – San Diego: Alleged Mexican drug trafficker extradited from Ecuador, AUSAO flipped news release
PAO submitted a flipped AUSAO news release regarding the Feb. 11 extradition of an alleged drug trafficker, who was extradited to the United States from Ecuador was charged with participating in a long-running worldwide conspiracy to traffic substantial quantities of cocaine, from Central and South America to Mexico and ultimately into the United States, as well as laundering millions of dollars in drug proceeds. The news release contains a quote from HSI San Diego SAC C. Plantz, which will be used in a tweet on social media, per SAC approval.

HSI – San Diego: Three alleged Guatemalan drug traffickers extradited from Guatemala to the US to stand trial, AUSAO flipped news release
PAO submitted a flipped AUSAO news release regarding the Feb. 10 extradition of They face international cocaine trafficking charges in three separate indictments stemming from Operation Guerrilla Unit, a long-term investigation spearheaded by Homeland Security Investigations (HSI) and the U.S. Attorney’s
Office in San Diego. The news release contains a quote from HSI San Diego SAC C. Plantz, which will be used in a tweet on social media, per SAC approval. (b)(8); (b)(7)(C)

ERO – Los Angeles: Orange County resident sues ICE, NPR affiliate (Josie Huang) Reporter Josie Huang requests information/comment regarding a current/former detained individual’s lawsuit against the agency. PAO responded that as a matter of policy, ICE does not comment on ongoing or pending litigation. (b)(6); (b)(7)(C)

Pending Queries

ICE – HQ: Request for background information regarding ICE actions on Interpol notices, CNN (Priscilla Alvarez) Reporter is requesting information on how ICE determines whether to comply with Interpol notices after ERO arrests a removable noncitizen. No story planned at the moment. Status: Background pending agency approval. (b)(6); (b)(7)(C)

ICE – HQ: Request for HSI CEIU assistance with story regarding child sexual exploitation case involving former CBP agent, AP (Mike Rezende) AP investigative reporter, Mike Rezende, is requesting support with a case involving (b)(6), (b)(6), a former CBP agent who died by suicide before he was able to face trial. (b)(6): wife was later ordered by a judge to 2½ years in prison Aug. 13, 2018. No deadline. Status: PAO working with C3 CEIU for to discuss possibilities. (b)(6); (b)(7)(C)

HSI – Harlingen: Indicting pending to be unsealed re: drug king pin, USAO news release UPDATE: USAO anticipates issuing Friday. ICE HSI PAO was notified by HSI Harlingen that the Southern District of Texas plans to issue a news release on the case against, drug king pin (b)(6); (b)(7)(C) is suspected of smuggling large amounts of narcotics from Matamoros, Mexico into Brownsville, Texas to destinations throughout the United States. USAO release will include a quote from HSI SAC Shane Folden. This is an HSI, and DEA led case. Once USAO issues release, PAO will send their release to all south and central Texas media contacts. PAO will also flip for ICE web posting plus amplify message on social media. Status: UPDATE: USAO anticipates issuing Friday. PAO will keep RD in the loop if any other development should come up. (b)(6); (b)(7)(C)

HSI – San Antonio: Sentencing of a Mexican man who shot at two Border Patrol agents, USAO news release USAO Western District of Texas anticipates issuing a news release to announce the sentencing of (b)(6); (b)(7)(C) for his role in shooting at two Border Patrol (BP) agents in January 2021. BP attempted to stop (b)(6), as he was transporting close to 10 noncitizens north of Brackettville, Texas. A high-speed pursuit ensued, and this is where (b)(6); fired multiple shots at the agents. USAO will include a quote from HSI SAC Shane Folden. This is an HSI, and FBI led case. Once USAO issues release, PAO will send their release to all south and central Texas media contacts. PAO will also flip for ICE web posting plus amplify message on social media.
**Status:** USAO anticipates issuing Wednesday afternoon. PAO will keep RD in the loop if anything should change on the date of issuance.

ICE – HQ: Torrance IG report, *BuzzFeed (Hamed Aleaziz)*  
Reporter reached out to ICE (and CoreCivic) for a comment about an unpublished IG report and findings related to the Torrance County Detention Facility in New Mexico – deadline March 8.  
**Status:** Flagged preliminary (draft) statement – on hold.

ERO – Chicago: Reporter requesting information about noncitizen transferred to Chicago, *Chicago Sun-Times (Elvia Malagón)*  
Reporter Elvia Malagón from the Chicago Sun-Times is requesting information regarding a noncitizen who is alleged to be in ICE custody in Illinois. Reporter stated the noncitizen was in custody in Texas and was transferred to Illinois for a subpoena in a criminal case. Requested DOB and A# from reporter.  
**Status:** PAO following up with ERO for internal background.

ERO – Chicago: Reporter requesting information about noncitizen transferred to Chicago, *Telemundo Chicago (María Cornejo)*  
Reporter María Cornejo from Telemundo Chicago is requesting information regarding a noncitizen who, according to the noncitizen’s family, is currently being held at the Will County Jail in Illinois as a witness to a crime which occurred in 2017. Family claims ICE closed the noncitizen’s case in Texas for a drug conviction. Reporter wants to know if the case was closed in Texas, why is the individual in deportation proceedings.  
**Status:** PAO following up with ERO for internal background.

PAO received request for print interview with SA on what HSI does to combat human trafficking in the Detroit area.  
**Status:** PAO working with SAC to identify SME. Will send DHS Flag when set.

ICE – HQ: Request for stats of Afghanistan removals, *CBS (Camilo Montoya-Galvez)*  
CBS reporter is interested in ICE FY21 and FY22 removals of Afghanistan nationals for a story on TPS for Afghanistan nationals. Camilo is aware that at least one Afghan national was removed to Afghanistan this year. PAO plans to response with enforcement priorities statement and background on removal numbers: In FY22, ICE facilitated the repatriation of two Afghan nationals to Afghanistan, as of Feb. 26. In FY21, ICE facilitated the repatriation of two Afghan nationals to Afghanistan. Deadline: Tomorrow morning (3/9).  
**Status:** IP cleared, pending OPA FO approval.
ICE – HQ: Request for information regarding Ukraine international students, CBS (Camilo Montoya-Galvez)

Reporter is request information on whether ICE will be offering Special Student Relief to Ukrainian students in the U.S. given the ongoing armed conflict in Ukraine. SEVP is still waiting on ICE Policy/ORAP to complete and suggested reaching out to The ICE Office of Regulatory Affairs and Policy (ORAP) since they have the lead on drafting SSR for Ukraine. I reached out to POC with ORAP and waiting for information back. Deadline: As soon as we have something available.

Status: Waiting for info from ORAP.

(b)(6); (b)(7)(C)

ICE.gov
NTR

Social Media

1. Twitter: Ron Wyden (Sen. from Oregon; 529,200 followers) tweeted a BuzzFeed News article - 83 retweets, 196 likes:

   1. This is big: I've confirmed that Homeland Security was conducting a bulk surveillance program on Americans' financial records. I'm calling for a full investigation into how ICE got the green light to start this mass collection of Americans’ personal data. https://t.co/FOXvHlsJcp4

1. Twitter: Matthew Wynia (1288 followers) tweeted a journal paper titled "the ethics of caring for detained people on a hunger strike" - 7 retweets, 14 likes:

   1. NEW! Out today in @AnsaloonM - our paper on ethical care of people in ICE detention who go on hunger strike. Written with the amazing @joanna_nm of @P4HR and Eunice Cho, Senior Attorney @ACLU . https://t.co/9RmCw2wo2r

1. Twitter: Orange County Rapid Response Network (immigration enforcement activist org.; 619 followers) tweeted a campaign poster - 4 retweets, 7 likes:

   1. An Nguyen, a formerly incarcerated Vietnamese refugee, lives every day in fear of ICE detention & deportation. As someone w/ asthma, detention in ICE facilities, evidenced to be COVID “tinderboxes,” puts An’s health in danger. @GavinNewsom #PardonAn & stop his deportation now!

Internal
NTR

Look Ahead
March
HSI – Detroit: HSI Mission Overview, Saint Claire Shores TV (Ron Frederick)

HSI and the CRO has worked with the reporter before. He’s a local key leader (former mayor and current city councilman) and his intent is to highlight the great work that HSI does. The acting SAC is very comfortable with this interview and there is no indication the reporter wishes to discuss anything off topic. PAO attending interview planning meeting with SAC and CRO March 10th.

TBD

Press conference featuring HSI Charlotte SAC Ronnie Martinez announcing the official declaration of Charlotte Douglass International Airport as a BEST location. The SAC will explain the formal declaration and the impact that the BEST will have in the area. PAO will staff the press conference being held at the airport.

TBD

Feb. (month of) ICE HSI: ICE OPA will be staffing an interview with WSJ’s Yuka Hayashi on HSI’s work against forced labor fishing vessels in the South Pacific with Adam Parks, HSI Regional Attaché in Canberra, and Forced Labor in Supply Chain (FLSC) Unit Chief Yuka gave a timeframe of “several weeks” for this story, to include a background or on-the-record call before then (once she’s further along).

TBD

HSI, Former TOC II DC, Joe Lestrangue, is approved to conduct an on-the-record interview with TheTrace.org journalist Alains Stephens, who has secured a publishing partner for a story in Vice World News. The story will cover auto sear firearm devices and federal government efforts to track and investigate the illegal production and distribution of these devices. Alain conducted a deep background interview with TOC II Div Chief, Joe Lestrangue, late December 2021. Alain is talking to other agencies, such as the ATF and USPIS for this story. Projected publishing date is around mid-March.
Thanks!

Adam V. Loiacono  
Deputy Principal Legal Advisor for Enforcement and Litigation  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
Iphone: 202-50[6](b)(6), (b)(7)(C)@ice.dhs.gov

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From: Loiacono, Adam V @ice.dhs.gov>  
Sent: Friday, March 25, 2022 2:59 PM  
To: Loiacono, Adam V @ice.dhs.gov>  
Subject: FW: Prep for the 430 pm call -IMPORTANT

Assistant Director  
Department of Homeland Security/Immigration and Customs Enforcement  
Office of Partnership and Engagement  
@ice.dhs.gov

From: Trickler-McNulty, Claire @ice.dhs.gov>  
Sent: Friday, March 25, 2022 2:33 PM  
To: Trickler-McNulty, Claire @ice.dhs.gov>  
Cc: Doyle, Kerry @ice.dhs.gov>  
Subject: RE: Prep for the 430 pm call -IMPORTANT

Assistant Director
Department of Homeland Security/Immigration and Customs Enforcement
Office of Partnership and Engagement

From: ice.dhs.gov
Sent: Friday, March 25, 2022 12:51 PM
To: Claire.Trickler-McNulty@ice.dhs.gov, Claire.Trickler-McNulty@ice.dhs.gov, Claire.Trickler-McNulty@ice.dhs.gov, Claire.Trickler-McNulty@ice.dhs.gov, Claire.Trickler-McNulty@ice.dhs.gov, Claire.Trickler-McNulty@ice.dhs.gov, Claire.Trickler-McNulty@ice.dhs.gov, Claire.Trickler-McNulty@ice.dhs.gov, Claire.Trickler-McNulty@ice.dhs.gov
Cc: Doyle.Kerry@ice.dhs.gov, Doyle.Kerry@ice.dhs.gov, Doyle.Kerry@ice.dhs.gov
Subject: Prep for the 430 pm call -IMPORTANT
Importance: High

Dear Claire,

As you know we weren’t cleared by the WH to roll out until this morning. Two news stories are already out. This, along with any other stories, will be what the stakeholders coming to the 430 pm calls will have seen.

WaPo: ICE to withdraw from, curb use of jails for immigrant detainees in 4 states - The Washington Post

Reuters: U.S. plans to close, scale back four immigrant detention centers, document shows | Reuters

For the 4:30 p.m. ET call, I am sending our guests the PR once lyes the greenlight for release. Per the original tick-tock that should be 2:15 pm. That gives stakeholders a couple hours to review but I think we should have an overview at the top. will be out so I will host.

and ERO, just want to make sure you have the excerpt from the WH approved rollout plan – see attached which has the messaging and RTQ.

Welcome
Brief Overview
Q&A ERO, OPLA

In addition to what’s in the plan, here are questions you will likely get (some have been sent to me since the news broke prematurely):

1. 
and I have 1:1 calls with some of the key groups before that call so will add to this list of anticipated questions.

Thanks everyone for your help!

Assistant Director
Department of Homeland Security/Immigration and Customs Enforcement
Office of Partnership and Engagement

@ice.dhs.gov
Hi 

Fantastic, I will go ahead and create a task bar for DCLD. Thank you!

Very respectfully,

 Associate Legal Advisor, Executive Communications Unit
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
500 12th Street S.W.,
Washington, DC 20536

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Good morning, DCLD,

OPLA has been asked to review the draft response to **Legal Director, Innovation Law Lab**, regarding Access to Legal Services for Haitian Immigrants at Torrance County Detention Facility (to be signed by AD1). Based on the first in time email (see below) ECU believes this may impact your equities. EROLD, FLO and GILD have already been tasked. Please let me know if you would like to be formally tasked. Otherwise, this is an FYI only and no further action is required of OPLA. Thank you!

Very respectfully,

**Associate Legal Advisor, Executive Communications Unit**
**Office of the Principal Legal Advisor**
**U.S. Immigrations and Customs Enforcement**
**U.S. Department of Homeland Security**

500 12th Street S.W.,
Washington, DC 20536

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---

Hi there,
Happy Holidays. I was wondering if we could have the attach below email and the attachment go through taskings? GILD should be tasked and assign me as the tasking, EROLD and El Paso should also be tasked.

Thank you,

Deputy Chief
Government Information Law Division
Office of the Principal Legal Advisor
Immigration and Customs Enforcement
500 12th St. SW, Floor Room
Washington, DC 20536
Office: 202-739-5100
Cell: 202-868-0049
Email: nicole.dhs.gov

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From: Guzman, Nicole G {nicole.dhs.gov}
Sent: Thursday, December 23, 2021 8:29 AM
To: nicole.dhs.gov
Subject: FW: Email Alert- Access to legal services for Haitian immigrants at Torrance County Detention Facility Letter

Good morning,

I agree with Adam. Can you please reach out to On the alert can you indicate who will be the POC, or let me know who and I can.

Thanks!

Nicole

Nicole G. Guzman
Deputy Principal Legal Advisor for General and Administrative Law
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
407.205.7701 (mobile)
From: Loiacono, Adam V  
Sent: Thursday, December 23, 2021 8:07 AM  
To: Guzman, Nicole G  
Cc: Loiacono, Adam V  
Subject: FW: Email Alert- Access to legal services for Haitian immigrants at Torrance County Detention Facility Letter

Nicole-

It looks like

Thanks,

Adam V. Loiacono  
Deputy Principal Legal Advisor for Enforcement and Litigation  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
Phone: 202-500 (b)(6)

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Greetings,

Respectfully,

Deputy Chief Counsel
Office of the Principal Legal Advisor, El Paso
U.S. Immigration and Customs Enforcement
Thanks!

Adam V. Loiacono  
Deputy Principal Legal Advisor for Enforcement and Litigation  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
Phone: 202-500-6000  
Email: @ice.dhs.gov

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Do you know?

Adam V. Loiacono  
Deputy Principal Legal Advisor for Enforcement and Litigation  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
Phone: 202-500-6000  
Email: @ice.dhs.gov
-----Original Appointment-----

From: Davis, Mike P <davis.dhs.gov>
Sent: Tuesday, March 29, 2022 4:09 PM
To: Loiacono, Adam V <davis.dhs.gov>; Padilla, Kenneth <davis.dhs.gov>
Subject: RE: Internal Prep for a Torrance Stakeholder Meeting

-----Original Appointment-----

From: Doyle, Kerry <davis.dhs.gov> On Behalf Of
Sent: Monday, March 28, 2022 7:47 PM
To: Davis, Mike P; Loiacono, Adam V; Guzman, Nicole G
Subject: FW: Internal Prep for a Torrance Stakeholder Meeting
When: Wednesday, March 30, 2022 2:30 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

Hi, Not sure who would be most appropriate to include on this planning meeting and potentially to be involved in the actual public engagement, so open to suggestions.

Thanks,
Kerry

-----Original Appointment-----

From: Trickler-McNulty, Claire <davis.dhs.gov> Doyle, Kerry <davis.dhs.gov>
Sent: Monday, March 28, 2022 6:07 PM
To: Trickler-McNulty, Claire <davis.dhs.gov>; Doyle, Kerry <davis.dhs.gov>
Cc: Trickler-McNulty, Claire <davis.dhs.gov>
Subject: Internal Prep for a Torrance Stakeholder Meeting
When: Wednesday, March 30, 2022 2:30 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

(b)(6); (b)(7)(C); (b)(5)
Microsoft Teams meeting

Join on your computer or mobile app
Click here to join the meeting

Or call in (audio only)
+1 323-484-[b](6), [b](7)[c] # United States, Los Angeles
Phone Conference ID: [b](6), [b](7)[c] #
Find a local number | Reset PIN

Learn More | Meeting options
From: [Redacted]
Sent: Thu, 24 Mar 2022 18:27:57 +0000
To: [Redacted]
Cc: [Redacted]

Subject: RE: [EXTERNAL] Fraihat

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Thank you.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: [Redacted]
Sent: Thursday, March 24, 2022 2:19 PM
To: [Redacted]
Cc: [Redacted]
Subject: RE: [EXTERNAL] Fraihat
Kind regards,

(b)(6).

(b)(6), (b)(7)(C)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 257-8877

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From: @usdoj.gov
Sent: Thursday, March 24, 2022 10:52 AM
To: @ice.dhs.gov; @usdoj.gov; @hq.dhs.gov
Cc: @ice.dhs.gov; @usdoj.gov; @hq.dhs.gov

Subject: RE: [EXTERNAL] Frail...

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Thanks
Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From @ice.dhs.gov>
Sent: Thursday, March 24, 2022 10:30 AM
Cc: @ice.dhs.gov>

Hi

ICE accepts the suggested edits in blue from OIL. In addition, please see ICE’s responses to OIL’s questions in green below.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
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Thanks.

OIL’s proposed additions are below in blue, and question are in blue and highlighted. Nothing too major here – we’d like to turn this back to Plaintiffs by tomorrow. Please let us know if that will be possible.
Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-...
b)(5)
Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 25

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From: @usdoj.gov>
Sent: Monday, March 14, 2022 9:19 AM
To: @usdoj.gov; @ice.dhs.gov; @hq.dhs.gov; @;
Subject: RE: [EXTERNAL] Fraihat

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, you can click on report.

Good morning,

Thank you,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From:

Sent: Wednesday, March 09, 2022 2:42 PM
To:
Thank you.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-7717

From: [usdoj.gov]
Sent: Wednesday, March 09, 2022 7:37 AM

To: [usdoj.gov]; [ice.gov]; [hq.dhs.gov]; [ice.dhs.gov]; [officeofimmigrationlitigation.dhs.gov]
Cc: [usdoj.gov]; [ice.gov]; [hq.dhs.gov]; [officeofimmigrationlitigation.dhs.gov]

Subject: RE: [EXTERNAL] Fraihat
Good morning, ICE –

Thank you,

Senior Litigation Counsel
U.S. Department of Justice, Civil Division
Office of Immigration Litigation – District Court Section
P.O. Box 868 | Ben Franklin Station | Washington, DC 20044
Direct: (202) 536-0200 | Fax: (202) 305-7000 | Email: usdoj.gov

From: usdoj.gov
Sent: March 2, 2022 4:58 PM
To: ice.dhs.gov
Cc: ice.dhs.gov; hq.dhs.gov

[Redacted]
Subject: RE: [EXTERNAL] Fraihat

Yes, 60 days.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From
Sent: Wednesday, March 02, 2022 4:57 PM
To
Cc

Subject: RE: [EXTERNAL] Fraihat

Thank you, I think that would be helpful.
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From: b@b.gov; b@b.gov
Sent: Wednesday, March 2, 2022 4:55 PM
To: @ice.dhs.gov; b@b.gov; b@b.gov; @hq.dhs.gov;
Cc: @ice.dhs.gov; b@b.gov; b@b.gov; @hq.dhs.gov;

Subject: RE: [EXTERNAL] Frazier

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I can ask, but I’d imagine another 60 days.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: b@b.gov
Sent: Wednesday, March 2, 2022 4:52 PM
To: b@b.gov; b@b.gov; b@b.gov; @hq.dhs.gov;
Subject: RE: [EXTERNAL] Fraihat

What is the timeframe Plaintiffs are requesting for another extension? I do not see the draft motion attached.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253

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From: @usdoj.gov
Sent: Wednesday, March 2, 2022 3:34 PM
CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, you can click on report.

Thanks,

Thanks,
Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From: [b](b)(6), [b](b)(7)(C)

Sent: Wednesday, March 02, 2022 12:59 PM

To: [b](b)(6), [b](b)(7)(C)

Cc: [b](b)(6), [b](b)(7)(C)

Subject: RE: [EXTERNAL] Frailhat
Many thanks

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-1246

From: Deputy Director
Sent: Friday, February 25, 2022 12:35 PM
To: @hq.dhs.gov, @ice.dhs.gov, @usdoj.gov
Cc: @hq.dhs.gov, @ice.dhs.gov, @usdoj.gov

Subject: RE: [EXTERNAL] Fraihat

Thanks everyone.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-1246

From: Deputy Director
Sent: Friday, February 25, 2022 11:48 AM
To: @hq.dhs.gov, @usdoj.gov
Cc: @hq.dhs.gov, @ice.dhs.gov, @usdoj.gov

2022-ICLI-00045  4598
Subject: RE: [EXTERNAL] Fraihat

please see a few edits in the attached.

Best,

Assistant General Counsel for Litigation

Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(202) 744-1222

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Not sure if my earlier email went through. We are finalizing our input. You should hear back from me in my absence.

Kind regards,

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(o) (202) 267-4135 (m) (202) 853-3288

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Anything on this folks? Opposing counsel is checking in on our status so they can move forward with their revised proposal.

Sent from my iPad

On Feb 24, 2022, at 11:18 AM [b(6), b(7)] wrote:

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From: [b(6), b(7)]
Sent: Wednesday, February 23, 2022 2:55 PM

Thanks I will coordinate with schedule and link up with ICE to determine a time.
Kind regards,

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(202) 287-5565
hq.dhs.gov

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From: (b)(6), (b)(7)(C)
Sent: Wednesday, February 23, 2022 2:50 PM
To: (b)(6), (b)(7)(C)
Cc: (b)(6), (b)(7)(C)
Subject: Re: [EXTERNAL] Fraihat

Thank you. I think a call is still warranted to clear a few of our specific asks up. Can you please propose a time that works tomorrow?

Sent from my iPhone
On Feb 23, 2022, at 11:32 AM, @hq.dhs.gov wrote:

Attached please find consolidated/updated input from DHS + ICE and let us know if there's any more follow up needed before responding. Thanks for your patience.

Kind regards,

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(o) (202) 282-8110; (h) (202) 853-9400
@hq.dhs.gov

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From: @usdoj.gov
Sent: Tuesday, February 22, 2022 5:01 PM
To: @hq.dhs.gov
Cc: @ice.dhs.gov
Bcc: @ice.dhs.gov; Padilla, Kenneth
@hq.dhs.gov; Davis, Mike P

Subject: Re: [EXTERNAL] Fraihat
Thanks, and I see that the call was just cancelled. Should we still expect updates today, which we will then need to digest and get back to opposing counsel.

Sent from my iPhone

On Feb 22, 2022, at 9:52 AM @hq.dhs.gov wrote:

Friends—

Flagging that DHS and ICE are working on revised responses for DOJ’s review and anticipate canceling this call. We will follow up shortly.

Kind regards,

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(o) (202) 284-1000 (m) (202) 853-0500
hq.dhs.gov

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<Fraihat Draft Responses to OIL re Plaintiffs Mediation Follow Ups 2.22.22 (002) (2 23 22 Updated ICE DHS Input).docx>
<Fraihat 2.24 Draft Email to Counsel.docx>
From: [Redacted]
Sent: Fri, 25 Mar 2022 23:09:23 +0000
To: [Redacted]
Cc: [Redacted]
Subject: RE: [EXTERNAL] Fraihat

Hi [Redacted],

We were initially sent the wrong medical data. We’ve let them know and are now awaiting the correct information. They know we’re under a deadline, and we’ve sent a reminder.

Thanks,

[Redacted]

--------------------

[Redacted]
Deputy Chief
District Court Litigation Division
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security

t: 202.736.2079
c: 202.536.7782

[Redacted]@ice.dhs.gov

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Subject: RE: [EXTERNAL] Fraihat

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Following up on this please.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-2378

From: b(6); b(7)@dhs.gov
Sent: Thursday, March 24, 2022 2:28 PM
To: b(6); b(7)@dhs.gov
Cc: b(6); b(7)@dhs.gov

Subject: RE: [EXTERNAL] Fraihat
Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-9500

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From: usdoj.gov
Sent: Thursday, March 24, 2022 10:52 AM
To: usdoj.gov; @ice.dhs.gov; hq.dhs.gov
Cc: @ice.dhs.gov; usdoj.gov; hq.dhs.gov

---

2022-ICLI-00045 4609
Subject: RE: [EXTERNAL] Fraihat

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Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From
Sent: Thursday, March 24, 2022 11:30 AM
ICE accepts the suggested edits in blue from OIL. In addition, please see ICE’s responses to OIL’s questions in green below.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 25

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Subject: RE: [EXTERNAL] Fraihat

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Thanks you Emily and all,

OIL’s proposed additions are below in below, and question are in blue and highlighted. Nothing too major here – we’d like to turn this back to Plaintiffs by tomorrow. Please let us know if that will be possible.

[Redacted]

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: [Redacted]
Sent: Friday, March 18, 2022 5:56 PM
To: [Redacted]
Cc: [Redacted]
Subject: RE: [EXTERNAL] Fraihat
b)(6), b)(7)(C), b)(5)
(b)(6), (b)(7)(C), (b)(5)
Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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From: @usdoj.gov
Sent: Monday, March 14, 2022 9:19 AM
To: @usdoj.gov; @ice.dhs.gov; @hq.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @hq.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov

Subject: RE: [EXTERNAL] Fraihat
Good morning.

In addition to opposing counsel’s settlement related questions for tomorrow, they have also sent along a series of questions/concerns regarding PI compliance that I have attached here. Please let us know if there is anything in here that ICE would like to discuss initially, but we would otherwise request consolidated responses by COB Friday, or a heads up by COB Thursday if responses are taking longer to assemble and draft.

Thank you,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616#

From: [Redacted]
Sent: Wednesday, March 09, 2022 2:42 PM
To: [Redacted]
Cc: [Redacted]
Bcc: [Redacted]

Subject: RE: [EXTERNAL] Frihat

Please find Plaintiffs’ follow-up questions attached. Please have consolidated and reviewed responses back to OIL by COB Tuesday 3/15, so that we can review and get back to Plaintiffs by COB on Wednesday 3/16.
Please also respond to let us know where DHS and ICE are on Plaintiffs’ request regarding an extension of their en banc deadline so that we can get back to them with something today, even if not a final decision.

Thank you.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-...

From: [redacted]
Sent: Wednesday, March 09, 2022 7:37 AM
To: [redacted]; [redacted]; [redacted]; [redacted]
Cc: [redacted]; [redacted]; [redacted]; [redacted]; [redacted]; [redacted]; [redacted]

Subject: RE: [EXTERNAL] Fraihat

Good morning, ICE —
Thank you,

Senior Litigation Counsel
U.S. Department of Justice, Civil Division
Office of Immigration Litigation – District Court Section
P.O. Box 868 | Ben Franklin Station | Washington, DC 20044
Direct: (202) 532-____ Fax: (202) 305-7000 | Email usdoi.gov

Sent: March 2, 2022 4:58 PM

From: @usdoi.gov
To: @ice.dhs.gov; @hq.dhs.gov;
Cc: @ice.dhs.gov; @usdoj.gov; @hq.dhs.gov;
Subject: RE: [EXTERNAL] Fraihat

Yes, 60 days.

Deputy Director
Office of Immigration Litigation
District Court Section

Sent: Wednesday, March 02, 2022 4:57 PM
From: @ice.dhs.gov
To: @usdoj.gov; @hq.dhs.gov;
Thank you, I think that would be helpful.

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-...

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I can ask, but I’d imagine another 60 days.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-...
What is the timeframe Plaintiffs are requesting for another extension? I do not see the draft motion attached.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 25

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From: @usdoj.gov
Sent: Wednesday, March 2, 2022 3:34 PM
To: @hq.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @usdoj.gov; @hq.dhs.gov; @ice.dhs.gov; @hq.dhs.gov; @ice.dhs.gov; @hq.dhs.gov; @ice.dhs.gov; @hq.dhs.gov; @ice.dhs.gov; @usdoj.gov; Padilla, Kenneth; @ice.dhs.gov; @hq.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @hq.dhs.gov; @ice.dhs.gov; @usdoj.gov; @ice.dhs.gov; @hq.dhs.gov; @ice.dhs.gov; @usdoj.gov; Loiacono, Adam V; Davis, Mike P
Subject: RE: [EXTERNAL] Fraihat
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extensions?

Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From: Robins, Jeffrey (CIV)
Sent: Wednesday, March 02, 2022 12:59 PM
To: @hq.dhs.gov; @ice.dhs.gov; @usdoj.gov; @ice.dhs.gov;
Cc: @hq.dhs.gov; @ice.dhs.gov; @usdoj.gov; @ice.dhs.gov;

Thanks,
Subject: RE: [EXTERNAL] Fraihat

From: [Redacted]
Sent: Friday, February 25, 2022 12:35 PM

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 61...
Thanks everyone.

(b)(6); (b)(7)(C)

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-(h)(6)

From: __________@hq.dhs.gov
Sent: Friday, February 25, 2022 11:48 AM
To: __________@hq.dhs.gov
Cc: __________@ice.dhs.gov

Subject: RE: [EXTERNAL] Fraihat

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

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(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

(Loiacono, Adam V)

(b)(6); (b)(7)(C)

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(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)
From: (b)(6); (b)(7)(C) @hq.dhs.gov>

Sent: Thursday, February 24, 2022 9:50 PM

To: (b)(6); (b)(7)(C) @usdoi.gov>; (b)(6); (b)(7)(C) @hq.dhs.gov>

Cc: (b)(6); (b)(7)(C) @ice.dhs.gov>; (b)(6); (b)(7)(C) @ice.dhs.gov>

Subject: RE: [EXTERNAL] Fraihat

Hi (b)(6);

Not sure if my earlier email went through. We are finalizing our input. You should hear back from (b)(6) in my absence.

Kind regards,

(b)(6); (b)(7)(C)

Attorney Advisor, Litigation
Legal Counsel Division
From: [b](6); [b](7)(C)@usdoj.gov
Sent: Thursday, February 24, 2022 9:10 PM
To: [b](6); [b](7)(C)@hq.dhs.gov
Cc: [b](6); [b](7)(C)@ice.dhs.gov; [b](6); [b](7)(C)@hq.dhs.gov; [b](6); [b](7)(C)@usdoj.gov; [b](6); [b](7)(C)@ice.dhs.gov; [b](6); [b](7)(C)@ice.dhs.gov; [b](6); [b](7)(C)@ice.dhs.gov; [b](6); [b](7)(C)@ice.dhs.gov; [b](6); [b](7)(C)@usdoj.gov; Padilla, Kenneth
{[b](6); [b](7)(C)@ice.dhs.gov
[b](6); [b](7)(C)@HQ.DHS.GOV; [b](6); [b](7)(C)@ice.dhs.gov; [b](6); [b](7)(C)@ice.dhs.gov; [b](6); [b](7)(C)@usdoj.gov; [b](6); [b](7)(C)@usdoj.gov; [b](6); [b](7)(C)@usdoj.gov; [b](6); [b](7)(C)@usdoj.gov; [b](6); [b](7)(C)@usdoj.gov; [b](6); [b](7)(C)@usdoj.gov; Looacono, Adam V <[b](6); [b](7)(C)@ice.dhs.gov>; Davis, Mike P
[b](6); [b](7)(C)@ice.dhs.gov
[b](6); [b](7)(C)@usdoj.gov;
[b](6); [b](7)(C)@usdoj.gov; [b](6); [b](7)(C)@usdoj.gov; [b](6); [b](7)(C)@usdoj.gov; [b](6); [b](7)(C)@usdoj.gov; [b](6); [b](7)(C)@usdoj.gov; [b](6); [b](7)(C)@usdoj.gov; [b](6); [b](7)(C)@usdoj.gov
Subject: Re: [EXTERNAL] Fraihat

Anything on this folks? Opposing counsel is checking in on our status so they can move forward with their revised proposal.

Sent from my iPad

On Feb 24, 2022, at 11:18 AM, [b](6); [b](7)(C)@usdoj.gov wrote:

Thanks for the call this morning. Please find attached a draft email for opposing counsel that attempts to distill our current positions. I appreciate any comments/edits that can be provided by COB, or let me know if you’ll need longer.
Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: (b)(6); (b)(7)(C) @hq.dhs.gov
Sent: Wednesday, February 23, 2022 2:55 PM
To: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov;
Cc: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov;
       (b)(6); (b)(7)(C) @usdoj.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov;
       (b)(6); (b)(7)(C) @hq.dhs.gov;
       (b)(6); (b)(7)(C) @usdoj.gov;
       (b)(6); (b)(7)(C) @ice.dhs.gov;
       (b)(6); (b)(7)(C) @ice.dhs.gov;
       (b)(6); (b)(7)(C) @hq.dhs.gov;
       (b)(6); (b)(7)(C) @usdoj.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov;

Subject: RE: [EXTERNAL] Fraihat

Thanks [b](6) I will coordinate with [b](6) schedule and link up with ICE to determine a time.

Kind regards,

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(o) (202) 282-[b](6) (m) (202) 853-[b](6)

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From: (b)(6); (b)(7)(C) @usdoj.gov>
Sent: Wednesday, February 23, 2022 2:50 PM
To: (b)(6); (b)(7)(C) @hq.dhs.gov>
Cc: (b)(6); (b)(7)(C) @ice.dhs.gov>; (b)(6); (b)(7)(C) @ice.dhs.gov>; (b)(6); (b)(7)(C) @ice.dhs.gov>; (b)(6); (b)(7)(C) @hq.dhs.gov>; (b)(6); (b)(7)(C) @usdoj.gov>
Subject: Re: [EXTERNAL] Fraihat

Thank you. I think a call is still warranted to clear a few of our specific asks up. Can you please propose a time that works tomorrow?

Sent from my iPhone

On Feb 23, 2022, at 11:32 AM (b)(6); (b)(7)(C) @hq.dhs.gov> wrote:

Hi (b)(6);

Attached please find consolidated/updated input from DHS + ICE and let us know if there's any more follow up needed before responding. Thanks for your patience.

Kind regards,

(b)(6); (b)(7)(C)
Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(o) (202) 284-(b)(6); (m) (202) 853-(b)(6); (b)(6); (b)(7)(C) @hq.dhs.gov
Thanks, and I see that the call was just cancelled. Should we still expect updates today, which we will then need to digest and get back to opposing counsel.

Sent from my iPhone

On Feb 22, 2022, at 9:52 AM @hq.dhs.gov wrote:

Friends—

Flagging that DHS and ICE are working on revised responses for DOJ’s review and anticipate canceling this call. We will follow up shortly.
Kind regards,

(b)(6); (b)(7)(C)
Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(o) (202) 282-(b)(6) (m) (202) 85-(b)(6);
(b)(6); (b)(7)(C) @hq.dhs.gov

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<Fraihat Draft Responses to OIL re Plaintiffs Mediation Follow Ups 2.22.22 (002) (2 23 22 Updated ICE DHS Input).docx>
<Fraihat 2.24 Draft Email to Counsel.docx>
CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, you can click on report.

Thank you. I’ve incorporated as best I can and send the attached final correspondence to opposing counsel.
Subject: RE: [EXTERNAL] Fraihat

Hi [b](6); [b](7); [b](8);

(b)(5)
Kind regards,

(b)(6)

(b)(6); (b)(7)(C)
Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253- (b)(6):

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From: (b)(6); (b)(7)(C) @usdoj.gov
Sent: Friday, March 25, 2022 4:56 PM
To: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov
Subject: RE: [EXTERNAL] Fraihat

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Following up on this please.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From:

Sent: Thursday, March 24, 2022 2:28 PM

To:

Cc:
Hi [b](6):

In addition, these inquiries required a significant amount of back and forth with various offices in the field, which resulted in delays. However, please our additional responses below in red.
Kind regards,

--- ATTORNEY/CLIENT PRIVILEGE --- ATTORNEY WORK PRODUCT ---

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Subject: RE: [EXTERNAL] Fraihat

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Thanks (b)(6).

(b)(5)

Thanks,

(b)(8).

(b)(6); (b)(7)(C)

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-(b)(6).

From: (b)(6); (b)(7)(C)@ice.dhs.gov
Sent: Thursday, March 24, 2022 10:30 AM
To: (b)(6); (b)(7)(C)@usdoj.gov; (b)(6); (b)(7)(C)@usdoj.gov; (b)(6); (b)(7)(C)@hq.dhs.gov; (b)(6); (b)(7)(C)
Hi [b](6).

ICE accepts the suggested edits in blue from OIL. In addition, please see ICE’s responses to OIL’s questions in green below.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-[b](8)

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From: [b](6); [b](7)(C) @usdoj.gov
Sent: Monday, March 21, 2022 6:42 PM
Subject: RE: [EXTERNAL] Fraihat

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and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, you
can click on report.

Thanks you.

OIL’s proposed additions are below in below, and question are in blue and highlighted. Nothing too
major here – we’d like to turn this back to Plaintiffs by tomorrow. Please let us know if that will be
possible.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From
Sent: Friday, March 18, 2022 5:56 PM
To
Cc


Subject: RE: [EXTERNAL] Fraihat

Hi (b)(6):
(b)(6); (b)(7)(C); (b)(5)
(b)(6); (b)(7)(C); (b)(5)
Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-__

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Good morning.

In addition to opposing counsel’s settlement related questions for tomorrow, they have also sent along a series of questions/concerns regarding PI compliance that I have attached here. Please let us know if there is anything in here that ICE would like to discuss initially, but we would otherwise request consolidated responses by COB Friday, or a heads up by COB Thursday if responses are taking longer to assemble and draft.

Thank you,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From: Deputy Director
Sent: Wednesday, March 09, 2022 2:42 PM
To: Deputy Director
Cc: Deputy Director, Deputy Director

Subject: RE: [EXTERNAL] Faihat
Please find Plaintiffs’ follow-up questions attached. Please have consolidated and reviewed responses back to OIL by COB Tuesday 3/15, so that we can review and get back to Plaintiffs by COB on Wednesday 3/16.

Please also respond to let us know where DHS and ICE are on Plaintiffs’ request regarding an extension of their en banc deadline so that we can get back to them with something today, even if not a final decision.

Thank you.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: @usdoj.gov>
Sent: Wednesday, March 09, 2022 7:37 AM
To: @usdoj.gov>; @ice.dhs.gov>; @hq.dhs.gov>  
Cc: @ice.dhs.gov>; @hq.dhs.gov>; @ice.dhs.gov>; @hq.dhs.gov>; @usdoj.gov>; @ice.dhs.gov>; @usdoj.gov>; @ice.dhs.gov>; @ice.dhs.gov>; @ice.dhs.gov>; @ice.dhs.gov>; @ice.dhs.gov>; @ice.dhs.gov>; @ice.dhs.gov>;  
Subject: RE: [EXTERNAL] Fraihat

Good morning, ICE –
forward. They also suggested that any agreement on these issues for class members may be expanded to protect individuals with non-COVID-related medical issues and disabilities as negotiations move into those areas.

We scheduled the next mediation session for April 12, 2022, 11am ET, but Judge Wilner was clear that he did not want to gather everyone again if the parties were not ready to make substantive progress by that date.

Lastly, a reminder that we need DHS and ICE positions on Plaintiffs’ extension request on the en banc rehearing deadline.

Thank you,

Senior Litigation Counsel
U.S. Department of Justice, Civil Division
Office of Immigration Litigation – District Court Section
P.O. Box 868 | Ben Franklin Station | Washington, DC 20044
Direct: (202) 532 | Fax: (202) 305-7000 | Email: @usdoj.gov

From: @usdoj.gov
Sent: March 2, 2022 4:58 PM
To: @ice.dhs.gov, @hq.dhs.gov;
Cc: @ice.dhs.gov, @hq.dhs.gov;

Subject: RE: [EXTERNAL] Fraihat

Yes, 60 days.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

2022-ICLI-00045 4660
From: [b](b)(6), (b)(7)(C)

Sent: Wednesday, March 02, 2022 4:57 PM

To: [b](b)(6), (b)(7)(C) @usdoj.gov; [b](b)(6), (b)(7)(C) @ice.dhs.gov; [b](b)(6), (b)(7)(C) @hq.dhs.gov;

Cc: [b](b)(6), (b)(7)(C) @ice.dhs.gov; [b](b)(6), (b)(7)(C) @usdoj.gov; [b](b)(6), (b)(7)(C) @hq.dhs.gov;

Subject: RE: [EXTERNAL] Fraihat

Thank you, I think that would be helpful.

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 25

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From: [b](b)(6), (b)(7)(C) @usdoj.gov

Sent: Wednesday, March 2, 2022 4:55 PM
Subject: RE: [EXTERNAL] Fraihat

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I can ask, but I’d imagine another 60 days.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: [ICE Office of Immigration Litigation]
Sent: Wednesday, March 02, 2022 4:52 PM

To: [ICE Office of Immigration Litigation]
Cc: [ICE Office of Immigration Litigation]

Subject: RE: [EXTERNAL] Fraihat

Hi,

What is the timeframe Plaintiffs are requesting for another extension? I do not see the draft motion attached.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 13th Street SW
Washington, D.C. 20536
Mobile: (202) 25

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From: usdoj.gov
Sent: Wednesday, March 2, 2022 3:34 PM
To: usdoj.gov
Cc: usdoj.gov, hq.dhs.gov, ice.dhs.gov, @ice.dhs.gov, b(6), b(7)(C)

2022-ICLI-00045 4663
Thanks,

I hope you are doing well. The current deadline for filing a petition for rehearing en banc is April 5, so we would like to get another consent motion for an extension on file next week to allow the mediation efforts to keep proceeding. It seems like Judge Wilner has been helpful and both sides feel that mediation has been productive so far. Please let us know if the attached motion is acceptable to ICE.

Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-
Subject: RE: [EXTERNAL] Fraihat

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-
Thanks everyone.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-0060

Sent: Friday, February 25, 2022 11:48 AM

To: hq.dhs.gov; usdoj.gov; ice.dhs.gov
Cc: hq.dhs.gov; usdoj.gov; ice.dhs.gov

Subject: RE: [EXTERNAL] Fraihat
Subject: RE: [EXTERNAL] Fraihat

please see a few edits in the attached.

Best,

Assistant General Counsel for Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(202) 740-1123
hq.dhs.gov

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From: hq.dhs.gov
Sent: Thursday, February 24, 2022 9:50 PM
To: hq.dhs.gov; usdoj.gov; ice.dhs.gov; adamp@ice.dhs.gov
Cc: hq.dhs.gov; usdoj.gov; ice.dhs.gov; adamp@ice.dhs.gov

Subject: RE: [EXTERNAL] Fraihat

Not sure if my earlier email went through. We are finalizing our input. You should hear back from me in my absence.

2022-ICLI-00045 4667
Kind regards,

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(o) (202) 284-7777 (m) (202) 853-6715
zhq.dhs.gov

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USE ONLY. FOIA exempt under 5 U.S.C. § 552(b)(5).

From: [redacted]@usdoj.gov
Sent: Thursday, February 24, 2022 9:10 PM
To: [redacted]@hq.dhs.gov
Cc: [redacted]@ice.dhs.gov

Subject: Re: [EXTERNAL] Faihat

Anything on this folks? Opposing counsel is checking in on our status so they can move forward with
their revised proposal.

Sent from my iPad

On Feb 24, 2022, at 11:18 AM, [redacted]@usdoj.gov wrote:
Thanks for the call this morning. Please find attached a draft email for opposing counsel that attempts to distill our current positions. I appreciate any comments/edits that can be provided by COB, or let me know if you’ll need longer.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-...

From: @hq.dhs.gov
Sent: Wednesday, February 23, 2022 2:55 PM
To: @ice.dhs.gov
Cc: @usdoj.gov

Subject: RE: [EXTERNAL] Fraihat

Thanks I will coordinate with schedule and link up with ICE to determine a time.

Kind regards,

Senior Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(202) 287-...

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From: [Redacted]@usdoj.gov
Sent: Wednesday, February 23, 2022 2:50 PM
To: [Redacted]@ice.dhs.gov; [Redacted]@ice.dhs.gov; [Redacted]@usdoj.gov;
Cc: [Redacted]@ice.dhs.gov; [Redacted]@ice.dhs.gov; [Redacted]@ice.dhs.gov;
Subject: Re: [EXTERNAL] Frailhat

Thank you. I think a call is still warranted to clear a few of our specific asks up. Can you please propose a time that works tomorrow?

Sent from my iPhone

On Feb 23, 2022, at 11:32 AM, [Redacted]@hq.dhs.gov wrote:

Attached please find consolidated/updated input from DHS + ICE and let us know if there’s any more follow up needed before responding. Thanks for your patience.

Kind regards,

[Redacted]

Attorney Advisor, Litigation
Thanks, and I see that the call was just cancelled. Should we still expect updates today, which we will then need to digest and get back to opposing counsel.

Sent from my iPhone

On Feb 22, 2022, at 9:52 AM @hq.dhs.gov wrote:
Friends—

Flagging that DHS and ICE are working on revised responses for DOJ’s review and anticipate canceling this call. We will follow up shortly.

Kind regards,

[Redacted]

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(o) (202) 282- [Redacted] (m) (202) 85 [Redacted]

[Redacted]@hq.dhs.gov

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<Fraihat Draft Responses to OIL re Plaintiffs Mediation Follow Ups 2.22.22 (002) (2 23 22 Updated ICE DHS Input).docx>
<Fraihat 2.24 Draft Email to Counsel.docx>
From: [Redacted]
Sent: Sat, 26 Mar 2022 01:47:44 +0000
To: [Redacted]
Cc: [Redacted]
Subject: RE: Frihat: individual/facility non-compliance issues - CONFIDENTIAL

Please find responses and further responses below in blue. Please note that given the personal identifiers and health-related information, this response should be considered CONFIDENTIAL pursuant to the protective order.

Also, please note that an email in this email string from you, dated February 7 at 1:45 pm is likely privileged.

Have a nice weekend.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-...

From: [Redacted]@dralegal.org>
Sent: Friday, March 11, 2022 7:41 PM
To: [Redacted]@usdoj.gov>
Cc: [Redacted]@usdoj.gov>
Subject: [EXTERNAL] RE: Frihat: individual/facility non-compliance issues

Counsel,
Sincerely,
Disability Rights Advocates
Staff Attorney
Pronouns: she, her, hers
2001 Center Street, Berkeley, CA 94704
P 510 526-4700 F 510 526-4707
www.dralegal.org

From: @creeclaw.org>
Sent: Monday, February 7, 2022 1:45 PM
To: @creeclaw.org>
Subject: FW: Fraihat: Individual/facility non-compliance issues

FYI. This is not great engagement on their part.

From: @usdoj.gov>
Sent: Monday, February 7, 2022 2:39 PM
To: @usdoj.gov>
Cc: borkick.com; b(6), b(7)(C)

2022-ICLI-00045 4681
Good afternoon, counsel –

Please find ICE’s responses to Plaintiffs’ concerns in red below.

Best Regards,

Trial Attorney
U.S. Department of Justice, Civil Division
Office of Immigration Litigation-District Court Section
P.O. Box 868, Ben Franklin Station
Washington, DC 20044
Tel. 202.566.6900 Fax. 202.305.7000

From: craeclaw.org
Sent: Friday, January 28, 2022 4:46 PM
To: dralegal.org, willkie.com
Cc: dorrick.com, splcenter.org
Subject: [EXTERNAL] Frazilat: individual/facility non-compliance issues

Counsel,

We provide summaries of several concerns below about individual- and facility-specific instances of non-compliance with the Frazilat PI, which we request that you bring to your clients. We request a response within a week. Please let us know if you have any questions.

Sincerely,


You're receiving this message because you're a member of the FraihatCounsel group from CREEC. To take part in this conversation, reply all to this message.
From: [REDACTED]
Sent: Sat, 12 Mar 2022 00:40:49 +0000
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]

Subject: [EXTERNAL] RE: Fraihat: individual/facility non-compliance issues

Counsel,

[REDACTED]

Sincerely,
[REDACTED]; [REDACTED]

Previously Raised Instances of Non-Compliance

[REDACTED]
Disability Rights Advocates

Staff Attorney
Pronouns: she, her, hers
2001 Center Street, Berkeley, CA 94704
P 510 529 3432 | F 510 665 8511 | www.dralegal.org

From: [b](@creeclaw.org)
Sent: Monday, February 7, 2022 1:45 PM
To: [b](@creeclaw.org)
Subject: FW: Fraihat: individual/facility non-compliance issues

FYI. This is not great engagement on their part.

From: [b](@usdoj.gov)
Sent: Monday, February 7, 2022 2:39 PM
To: [b](@creeclaw.org), [b](@usdoj.gov), [b](@orrick.com), [b](@dralegal.org), [b](@splcenter.org)
Subject: RE: Fraihat: individual/facility non-compliance issues

Good afternoon, counsel –

Please find ICE’s responses to Plaintiffs’ concerns in red below.

Best Regards,
Counsel,

We provide summaries of several concerns below about individual- and facility-specific instances of non-compliance with the *Fraihat Pl*, which we request that you bring to your clients. We request a response within a week. Please let us know if you have any questions.

Sincerely,

[Redacted]
You’re receiving this message because you’re a member of the FrihatCounsel group from CREEC. To take part in this conversation, reply all to this message.
Hi, Not sure who would be most appropriate to include on this planning meeting and potentially to be involved in the actual public engagement, so open to suggestions.

Thanks,
Kerry

-----Original Appointment-----
From: @ice.dhs.gov
Sent: Monday, March 28, 2022 6:07 PM
To: Doyle, Kerry
Cc: 
Subject: Internal Prep for a Torrance Stakeholder Meeting
When: Wednesday, March 30, 2022 2:30 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

Microsoft Teams meeting

Join on your computer or mobile app
Click here to join the meeting
Or call in (audio only)

+1 323-484-6576 United States, Los Angeles
Phone Conference ID: #
Find a local number | Reset PIN

Learn More | Meeting options
From: (b)(6), (b)(7)(C)
Sent: Mon, 28 Mar 2022 23:46:43 +0000
To: Doyle, (b)(6), (b)(7)(C)
Cc: Davis, Mike P; Loiacono, Adam V; Guzman, Nicole G, (b)(6), (b)(7)(C); (b)(6), (b)(7)(C)
Subject: Internal Prep for a Torrance Stakeholder Meeting

Microsoft Teams meeting

Join on your computer or mobile app
Click here to join the meeting

Or call in (audio only)
+1 323-484- (b)(6), (b)(7)(C) United States, Los Angeles
Phone Conference ID: (b)(6), (b)(7)(C)
Find a local number | Reset PIN

Learn More | Meeting options
From: [Redacted]
Sent: Tue, 29 Mar 2022 19:34:34 +0000
To: [Redacted]
Cc: Padilla, Kenneth [Redacted]
Subject: RE: [EXTERNAL] Fraihat
Attachments: [EXTERNAL] Individual non-compliance issue [Redacted]

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Please get us a response by noon on Thursday, or a heads up when you expect to send it.

Thank you,

[Redacted]

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616 [Redacted]
From: [b](b)(6) [b](b)(7)[C]

Sent: Friday, March 25, 2022 9:48 PM

Subject: RE: [EXTERNAL] Fraihat

Thank you. I’ve incorporated as best I can and send the attached final correspondence to opposing counsel.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616 [b](b)(6)...

From: [b](b)(6) [b](b)(7)[C]

Sent: Friday, March 25, 2022 7:46 PM
Subject: RE: [EXTERNAL] Fraihat

Please see ICE’s responses in red:
Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division

500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-
Subject: RE: [EXTERNAL] Fraihat

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Following up on this please.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

Sent: Thursday, March 24, 2022 2:28 PM
To: @ice.dhs.gov; @usdoj.gov;
Cc: @hq.dhs.gov; @ice.dhs.gov;
Subject: RE: [EXTERNAL] Fraihat

Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 61

From: [ICE] @ice.dhs.gov
Sent: Thursday, March 24, 2022 2:19 PM
To: [ICE] @ice.dhs.gov
Cc: [ICE] @ice.dhs.gov

Subject: RE: [EXTERNAL] Fraihat
Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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Subject: RE: [EXTERNAL] Fraihat

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Thanks

Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From
Sent: Thursday, March 24, 2022 10:30 AM
ICE accepts the suggested edits in blue from OIL. In addition, please see ICE’s responses to OIL’s questions in green below.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 25...

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From: usdoj.gov>
Sent: Monday, March 21, 2022 6:42 PM
To: hq.dhs.gov; ice.dhs.gov; usdoj.gov;
Cc: hq.dhs.gov; ice.dhs.gov; usdoj.gov;
Subject: RE: [EXTERNAL] Fraihat

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Thanks you and all,

OIL’s proposed additions are below in bold, and question are in blue and highlighted. Nothing too major here – we’d like to turn this back to Plaintiffs by tomorrow. Please let us know if that will be possible.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: ice.dhs.gov>
Sent: Friday, March 18, 2022 5:56 PM
To: usdoj.gov; hq.dhs.gov;
Cc: ice.dhs.gov; hq.dhs.gov;
Subject: RE: [EXTERNAL] Fraihat

Please see below for ICE’s responses in red. Please note that two requests below need additional time for ICE to finalize a response.
Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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Subject: RE: [EXTERNAL] Fraihat

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Good morning.

In addition to opposing counsel’s settlement related questions for tomorrow, they have also sent along a series of questions/concerns regarding PI compliance that I have attached here. Please let us know if there is anything in here that ICE would like to discuss initially, but we would otherwise request consolidated responses by COB Friday, or a heads up by COB Thursday if responses are taking longer to assemble and draft.

Thank you,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-3522

From: [b][c] (b)(7)(C)
To: [b][c] [b][c] [b][c] [b][c] [b][c] [b][c]
Cc: [b][c] [b][c] [b][c] [b][c] [b][c] [b][c] [b][c] [b][c] [b][c] [b][c] [b][c] [b][c] [b][c] [b][c] [b][c] [b][c] [b][c]

Sent: Wednesday, March 09, 2022 2:42 PM
Subject: RE: [EXTERNAL] Fraihat

Please find Plaintiffs’ follow-up questions attached. Please have consolidated and reviewed responses back to OIL by COB Tuesday 3/15, so that we can review and get back to Plaintiffs by COB on Wednesday 3/16.

Please also respond to let us know where DHS and ICE are on Plaintiffs’ request regarding an extension of their en banc deadline so that we can get back to them with something today, even if not a final decision.

Thank you.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: (b)(6), (b)(7)(C) usdoj.gov>
Sent: Wednesday, March 09, 2022 7:37 AM
To: (b)(6), (b)(7)(C) usdoj.gov>
Cc: (b)(6), (b)(7)(C) usdoj.gov>

Subject: RE: [EXTERNAL] Fraihat

Good morning, ICE –

Thank you for the support preparing for and during Monday’s mediation session.
Thank you,

Senior Litigation Counsel
U.S. Department of Justice, Civil Division
Office of Immigration Litigation – District Court Section
P.O. Box 888 | Ben Franklin Station | Washington, DC 20044
Direct: (202) 532-5698 | Fax: (202) 305-7000 | Email: usdoj.gov

From: @usdoj.gov>
Sent: March 2, 2022 4:58 PM

Cc: @usdoj.gov>

Subject: RE: [EXTERNAL] Fraihat

Yes, 60 days.

Deputy Director
From: [redacted]@ice.dhs.gov
Sent: Wednesday, March 02, 2022 4:57 PM
To: [redacted]@usdoj.gov; [redacted]@hq.dhs.gov; [redacted]@ice.dhs.gov
Cc: [redacted]@hq.dhs.gov; [redacted]@usdoj.gov

Subject: RE: [EXTERNAL] Fraihat

Thank you, I think that would be helpful.

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-__

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I can ask, but I’d imagine another 60 days.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-
What is the timeframe Plaintiffs are requesting for another extension? I do not see the draft motion attached.

Kind regards,

[Redacted]

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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Subject: RE: [EXTERNAL] Fraihat

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Please also see below, opposing counsel’s request for a further continuance of their deadline to seek en banc consideration of the Ninth Circuit’s decision. I’d like to be able to get back to them before the end of the week.

If there is concern about the pace of mediation, I would propose that we could agree to one more extension, but that we would need to see progress in mediation before agreeing to any further extensions?

Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From:
Sent: Wednesday, March 02, 2022 12:59 PM
To:
Cc:
Subject: RE: [EXTERNAL] Fraihat

Deputy Director
Office of Immigration Litigation
District Court Section
From: [REDACTED]  
Sent: Friday, February 25, 2022 12:35 PM  
To: [REDACTED], [REDACTED]  
Cc: [REDACTED]  
Subject: RE: [EXTERNAL] Fraihat

Thanks everyone.

Deputy Director  
Office of Immigration Litigation  
District Court Section  
(202) 616-8000
Subject: RE: [EXTERNAL] Fraihat

please see a few edits in the attached.

Best,

Assistant General Counsel for Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(202) 740-6183
hq.dhs.gov

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From: @hq.dhs.gov
Sent: Thursday, February 24, 2022 9:50 PM
To: @usdoj.gov, @ice.dhs.gov
Cc: @hq.dhs.gov, @usdoj.gov; Loiacono, Adam V @ice.dhs.gov; Davis, Mike P

Subject: RE: [EXTERNAL] Fraihat

H:
Not sure if my earlier email went through. We are finalizing our input. You should hear back from me in my absence.

Kind regards,

[Redacted]

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security

(202) 853-0724

@hq.dhs.gov

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From: [Redacted]@usdoj.gov
Sent: Thursday, February 24, 2022 9:10 PM

Subject: Re: [EXTERNAL] Fraihat

 Anything on this folks? Opposing counsel is checking in on our status so they can move forward with their revised proposal.

Sent from my iPad
On Feb 24, 2022, at 11:18 AM @usdoj.gov wrote:

Thanks for the call this morning. Please find attached a draft email for opposing counsel that attempts to distill our current positions. I appreciate any comments/edits that can be provided by COB, or let me know if you’ll need longer.

From @hq.dhs.gov
Sent: Wednesday, February 23, 2022 2:55 PM
To: @ice.dhs.gov
Cc: @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov

Subject: RE: [EXTERNAL] Fraihat

Thanks, I will coordinate with schedule and link up with ICE to determine a time.

Kind regards,

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(o) (202) 282-5075 (m) (202) 856-5789
@hq.dhs.gov
Thank you. I think a call is still warranted to clear a few of our specific asks up. Can you please propose a time that works tomorrow?

Sent from my iPhone

On Feb 23, 2022, at 11:32 AM, [REDACTED] wrote:

Hi,

Attached please find consolidated/updated input from DHS + ICE and let us know if there’s any more follow up needed before responding. Thanks for your patience.

Kind regards,
From: @usdoj.gov
Sent: Tuesday, February 22, 2022 5:01 PM
To: @hq.dhs.gov
Cc: @ice.dhs.gov, @usdoj.gov
Subject: Re: [EXTERNAL] Fraihat

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Thanks, and I see that the call was just cancelled. Should we still expect updates today, which we will then need to digest and get back to opposing counsel.

Sent from my iPhone

On Feb 22, 2022, at 9:52 AM @hq.dhs.gov wrote:
Friends—

Flagging that DHS and ICE are working on revised responses for DOJ’s review and anticipate canceling this call. We will follow up shortly.

Kind regards,

[Redacted]
Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(o) (202) 282-5128 (m) (202) 853-7453
@hq.dhs.gov

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<Fraihat Draft Responses to OIL re Plaintiffs Mediation Follow Ups 2.22.22 (002) (2 23 22 Updated ICE DHS Input).docx>
<Fraihat 2.24 Draft Email to Counsel.docx>
From: [Redacted]
Sent: Tue, 29 Mar 2022 15:37:15 +0000
To: [Redacted]
Cc: [Redacted]
Subject: [EXTERNAL] Individual non-compliance issue

Counsel:

Sincerely,
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Yes. We have. I was about to ask him for an update.

Best,
Ken Padilla
Deputy Principal Legal Advisor for Field Legal Operations
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security  
(202) 736-0000 (office)/(646) 789-7000 (mobile)

“Every job is a self-portrait of the person who does it. Autograph your work with excellence.”

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From: Doyle, Kerry
Sent: Friday, February 18, 2022 3:16 PM
To: Davis, Mike P; Loiacono, Adam

OK. Thanks. I’ll get back to you.

PRIVILEGED

Kerry E. Doyle  
Principal Legal Advisor  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
U.S. Department of Homeland Security  
Office: 202-732-9718  
Cell: 202-510-9810

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From: Davis, Mike P
Sent: Friday, February 18, 2022 3:00 PM
To: Doyle, Kerry; Loiacono, Adam

Thanks.

From: Doyle, Kerry
Sent: Friday, February 18, 2022 2:05 PM
To: Davis, Mike P; Loiacono, Adam

Good idea. Thanks.

PRIVILEGED

Kerry E. Doyle  
Principal Legal Advisor  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
U.S. Department of Homeland Security
Office: 202-736-7000
Cell: 202-517-4737

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From: Davis, Mike P <davis.mike@dhs.gov>
Sent: Friday, February 18, 2022 2:04 PM
To: Doyle, Kerry <doyle.kerry@dhs.gov>; Loiacono, Adam V <loiacono.adam@dhs.gov>

I think so, but let me just have Ken ask [b](6)

From: Doyle, Kerry <doyle.kerry@dhs.gov>
Sent: Friday, February 18, 2022 2:03 PM
To: Davis, Mike P <davis.mike@dhs.gov>; Loiacono, Adam V <loiacono.adam@dhs.gov>

PRIVILEGED

Kerry E. Doyle
Principal Legal Advisor
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
Office: 202-736-7000
Cell: 202-517-4737

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From: Davis, Mike P <davis.mike@dhs.gov>
Sent: Friday, February 18, 2022 1:59 PM
To: Doyle, Kerry <doyle.kerry@dhs.gov>; Loiacono, Adam V <loiacono.adam@dhs.gov>

From: Doyle, Kerry
To: Davis, Mike P; Loiaco, Adam V


PRIVILEGED

Kerry E. Doyle
Principal Legal Advisor
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
Office: 202-732-2660
Cell: 202-510-

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From: @usdoj.gov
To: @hq.dhs.gov; @ice.dhs.gov;

Subject: Haitian Bridge Alliance, et al. v. Joseph R. Biden, et al., Civil Action No. 21-3317 (EGS)

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Dear Counsel:
On **January 13, 2022**, this office was served with a copy of the enclosed summons and complaint in the above-captioned case. This case has been assigned to **Assistants United States Attorney** and **(copied to this email)**. Our Answer or dispositive motion is due on **March 14, 2022**.

Regards,

[Redacted]
Paralegal Specialist
U.S. Attorney’s Office, Civil Division
(202) 252 555 Fourth Street, N.W.
Washington, DC 20530
Checking, but I don’t think so.

Adam V. Loiacono
Deputy Principal Legal Advisor for Enforcement and Litigation
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
Phone: 202-500-0100, 0101, 0102, 0103, 0104 @ice.dhs.gov

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-----Original Appointment-----
From: Doyle, Kerry b(6), b(7), b(8) b(9) b(10) ice.dhs.gov> On Behalf Of b(6), b(7), b(8) ice.dhs.gov
Sent: Monday, March 28, 2022 7:47 PM
To: Davis, Mike P; Loiacono, Adam V; Guzman, Nicole G
Subject: FW: Internal Prep for a Torrance Stakeholder Meeting
When: Wednesday, March 30, 2022 2:30 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting
No date has been set yet for the Torrance Stakeholder Meeting.

Microsoft Teams meeting

Join on your computer or mobile app
Click here to join the meeting

Or call in (audio only)
+1 323-484-73# United States, Los Angeles
Phone Conference III #
Find a local number | Reset PIN

Learn More | Meeting options
From: Loiacono, Adam V
Sent: Tue, 29 Mar 2022 20:54:44 +0000
To: Davis, Mike P; Padilla, Kenneth
Cc: Loiacono, Adam V
Subject: RE: Internal Prep for a Torrance Stakeholder Meeting

Adam V. Loiacono
Deputy Principal Legal Advisor for Enforcement and Litigation
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
Iphone: 202-506-2647

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From: Davis, Mike P; Padilla, Kenneth
Sent: Tuesday, March 29, 2022 4:45 PM
To: Loiacono, Adam V; Padilla, Kenneth
Subject: RE: Internal Prep for a Torrance Stakeholder Meeting

From: Loiacono, Adam V
Sent: Tuesday, March 29, 2022 4:34 PM
To: Davis, Mike P; Padilla, Kenneth
Subject: RE: Internal Prep for a Torrance Stakeholder Meeting

Adam V. Loiacono
Deputy Principal Legal Advisor for Enforcement and Litigation
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
From: Davis, Mike P [b](b); (b)(7)(C) @ice.dhs.gov
Date: Tuesday, Mar 29, 2022, 4:29 PM
To: Loiacono, Adam V [b](b); (b)(7)(C) @ice.dhs.gov, Padilla, Kenneth [b](b); (b)(7)(C) @ice.dhs.gov
Subject: RE: Internal Prep for a Torrance Stakeholder Meeting

Thank you, both!

From: Loiacono, Adam V [b](b); (b)(7)(C) @ice.dhs.gov
Sent: Tuesday, March 29, 2022 4:17 PM
To: Davis, Mike P [b](b); (b)(7)(C) @ice.dhs.gov, Padilla, Kenneth [b](b); (b)(7)(C) @ice.dhs.gov
Cc: Loiacono, Adam V [b](b); (b)(7)(C) @ice.dhs.gov
Subject: RE: Internal Prep for a Torrance Stakeholder Meeting

Checking, but I don’t think so.

Adam V. Loiacono
Deputy Principal Legal Advisor for Enforcement and Litigation
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
Iphone: 202-5[ ][b](b); (b)(7)(C) [b](b); (b)(7)(C) @ice.dhs.gov

From: Davis, Mike P [b](b); (b)(7)(C) @ice.dhs.gov
Sent: Tuesday, March 29, 2022 4:09 PM
To: Loiacono, Adam V [b](b); (b)(7)(C) @ice.dhs.gov, Padilla, Kenneth [b](b); (b)(7)(C) @ice.dhs.gov
Subject: RE: Internal Prep for a Torrance Stakeholder Meeting

[b](5)
-----Original Appointment-----
From: Doyle, Kerry <ice.dhs.gov> On Behalf Of <ice.dhs.gov>
Sent: Monday, March 28, 2022 7:47 PM
To: Davis, Mike P; Loiacono, Adam V; Guzman, Nicole G
Subject: FW: Internal Prep for a Torrance Stakeholder Meeting
When: Wednesday, March 30, 2022 2:30 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

Thanks,
Kerry

-----Original Appointment-----
From: <ice.dhs.gov>
Sent: Monday, March 28, 2022 6:07 PM
To: Doyle, Kerry; <ice.dhs.gov>
Cc: <ice.dhs.gov>
Subject: Internal Prep for a Torrance Stakeholder Meeting
When: Wednesday, March 30, 2022 2:30 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

No date has been set yet for the Torrance Stakeholder Meeting.
Microsoft Teams meeting

Join on your computer or mobile app
Click here to join the meeting

Or call in (audio only)
+1 323-484-6790 United States, Los Angeles
Phone Conference ID: 687-782-771

Find a local number | Reset PIN

Learn More | Meeting options
Subject: RE: [EXTERNAL] Fraihat

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Correspondence from opposing counsel here. Please let me know ICE’s responses to the bolded questions.
Thanks

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From: @ice.dhs.gov
Sent: Friday, May 20, 2022 11:18 AM
To: @usdoj.gov; @ice.dhs.gov
Cc: @hq.dhs.gov; @usdoj.gov

Subject: RE: [EXTERNAL] Faihat

Hi Faihat,

Both our proposal and potential position on another extension for Plaintiffs to file a petition en banc are currently with the Front Office. We hope to have an update soon.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
ICE, despite the ask for a check in yesterday, I have really heard nothing here (other than a side bar question from DHS).
One observation that I’ve been noodling on that may be helpful for ICE’s decision making here.
Folks, just checking in on all of this please.

Thanks,
From: (b)(6), (b)(7)(C)
Sent: Monday, May 16, 2022 2:53 PM
To: @ice.dhs.gov, @hq.dhs.gov
Cc: @hq.dhs.gov, @usdoj.gov, @ice.dhs.gov

Subject: RE: [EXTERNAL] Fraihat

and all,

Please see follow-along correspondence from Plaintiffs’ counsel, and initial response to your questions:
Kind regards,

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And on scheduling, both Plaintiffs and the SM indicate that they are available at 10 am PST the morning of 5/23. Can we please confirm and get this scheduled?

Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: CIV
Sent: Monday, May 16, 2022 1:12 PM
To: Padilla, Kenneth
Cc: Padilla, Kenneth

Subject: RE: [EXTERNAL] Faihat

Thank

I’ve followed up with them, but I understand that both options are still on the table for them.
Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-
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From: (b)(6); (b)(7)(C) @usdoj.gov
Sent: Friday, May 13, 2022 5:31 PM
To: (b)(6); (b)(7)(C) @ice.dhs.gov
Cc: (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; Padilla, Kenneth
(b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; Liacono, Adam V
(b)(6); (b)(7)(C) @ice.dhs.gov; Davis, Mike P
Subject: Re: [EXTERNAL] Fraihat

Please see below opposing counsel's ask for our position on a further en banc extension by COB Monday. I've already responded to indicate that we may not be able to get back to them by then. I also don't share the same sense of urgency that they do, but understand their desire to get a ruling before they have to put more effort into drafting. I also have no clarity on what we could say regarding progress in the mediation at this point. Please let me know what ICE and DHS think so I can send some response by Monday.

(b)(6);
Sent from my iPhone

On May 13, 2022, at 12:22 PM, (redacted)@usdoj.gov wrote:
Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-1246

From

Sent: Friday, May 13, 2022 9:03 AM
Apologies again for the delay. We will get this to you this afternoon.

Sent from my iPhone

On May 10, 2022, at 2:12 PM @ice.dhs.gov wrote:

Good afternoon,

Following up on previous request, do you have an estimate on when we can expect OIL’s thoughts on agreeing, or not agreeing, to another extension to file the en banc review?

Thanks in advance,

Acting Deputy Chief, on detail
Office of the Principal Legal Advisor
District Court Litigation Division
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
p: 404-895-3070
c: 703-200-3070

[https://eserviceregistration.ice.gov/](https://eserviceregistration.ice.gov/)

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From: [Redacted]

Sent: Friday, May 6, 2022 12:55 PM

Subject: RE: [EXTERNAL] Fraihat

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Thank you.

I'll pass that along and we'll get you something today.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-3272

From: [Redacted]

Sent: Friday, May 06, 2022 12:52 PM

To: [Redacted]

Cc: [Redacted]

Subject: [EXTERNAL] Fraihat
Subject: RE: [EXTERNAL] Fraihat

Thank you!

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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Subject: RE: [EXTERNAL] Fraihat

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Deputy Director
Office of Immigration Litigation
District Court Section
(202) 614-2924
Thank you, we are trying to see which of those slots may work.

In the meantime, can OIL provide insights on the pros and cons for agreeing to another extension for plaintiffs to file a petition en banc for ICE to consider as we elevate?

Kind regards,

Associate Legal Advisor

U.S. Immigration and Customs Enforcement

Office of the Principal Legal Advisor

District Court Litigation Division

500 12th Street SW

Washington, D.C. 20536

Mobile: (202) 253

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From: b@(b)(6),(b)(7)(C)
Sent: Thursday, April 28, 2022 4:06 PM
To: b@(b)(6),(b)(7)(C)
Cc: b@(b)(6),(b)(7)(C)
Bcc: b@(b)(6),(b)(7)(C)

Subject: RE: [EXTERNAL] Fraihat

I'm looping who may be plugging into this case after today and until a new immigration deputy comes onboard.

b@(b)(6),(b)(7)(C)

Deputy General Counsel
U.S. Department of Homeland Security

(202) 836-1ph

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Subject: RE: [EXTERNAL] Fraihat

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From:

Sent: Tuesday, April 26, 2022 9:47 AM

Cc:
Subject: RE: [EXTERNAL] Fraihat

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253

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Thank you.

Sent from my iPad

On Apr 22, 2022, at 11:21 AM, @ice.dhs.gov wrote:

Hi,

ICE request that the mediation session be the third week of May (week of May 16), given the amount of review the proposal would need and in order to have the most productive mediation session. We are gathering availability so we can propose the dates.

Kind regards,
ICE, does this proposed timeline work for you? I’d like to confirm with opposing counsel and the Magistrate Judge, thanks.
Okay, thank you. ICE is considering if the timeline is feasible and will follow up.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 25

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From: [ICE]@usdoj.gov
Sent: Tuesday, April 19, 2022 11:55 AM
To: [ICE]@usdoj.gov
Cc: [ICE]@usdoj.gov
Subject: RE: [EXTERNAL] Fraihat

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Best,

From: [ICE] Ice.dhs.gov
Sent: April 19, 2022 11:48 AM
To: [ICE] Ice.dhs.gov; [ICE] Ice.dhs.gov; [ICE] Ice.dhs.gov; [ICE] Ice.dhs.gov; [ICE] Ice.dhs.gov; [ICE] Ice.dhs.gov; [ICE] Ice.dhs.gov
Cc: [ICE] Ice.dhs.gov; [ICE] Ice.dhs.gov; [ICE] Ice.dhs.gov; [ICE] Ice.dhs.gov; [ICE] Ice.dhs.gov; [ICE] Ice.dhs.gov; [ICE] Ice.dhs.gov

Subject: RE: [EXTERNAL] Fraihat

Thank you for sending. Would the goal be to have ICE’s responses sent to OIL by April 29 or to Plaintiffs by April 29, so to OIL a few days before then?
Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 25----

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From: [b](6), [b](7)(C)@usdoj.gov
Sent: Tuesday, April 19, 2022 11:20 AM
To: [b](6), [b](7)(C)@ice.dhs.gov, [b](6), [b](7)(C)@hq.dhs.gov, [b](6), [b](7)(C)@ice.dhs.gov, [b](6), [b](7)(C)@usdoj.gov, [b](6), [b](7)(C)@ice.dhs.gov
Cc: [b](6), [b](7)(C)@hq.dhs.gov, [b](6), [b](7)(C)@usdoj.gov
Subject: RE: [EXTERNAL] Fraihat

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Thank you,

From: [REDACTED] @ice.dhs.gov
Sent: April 15, 2022 5:43 PM
To: [REDACTED] @usdoj.gov
Cc: [REDACTED] @hq.dhs.gov, [REDACTED] @ice.dhs.gov,
[REDACTED] @usdoj.gov, [REDACTED] @ice.dhs.gov,
[REDACTED] @hq.dhs.gov, [REDACTED] @ice.dhs.gov,
[REDACTED] @hq.dhs.gov, [REDACTED] @ice.dhs.gov;
Paddilla, Kenneth
Subject: RE: [EXTERNAL] Faihat

H:

(b)(5)
Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 25...
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(b)(5)

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From: (b)(8) (b)(7)(C)
Sent: Thursday, April 07, 2022 2:25 PM
To: @ice.dhs.gov
Cc: @ice.dhs.gov (@usdoj.gov)

Subject: RE: [EXTERNAL] Fraihat

Thank you.

Deputy Director
Office of Immigration Litigation
Subject: RE: [EXTERNAL] Fraihat
Please let us know if you have any additional questions. Thank you.

Sincerely,

Associate Legal Advisor
Department of Homeland Security
Immigration and Customs Enforcement
Office of the Principal Legal Advisor—District Court Litigation Division
500 12th Street SW Mailstop 5900
Washington, D.C. 20536
Mobile Phone: (202) 607

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From
Sent: Tuesday, April 5, 2022 6:38 PM
To
Cc
Subject: RE: [EXTERNAL] Fraihat

Hi
Thank you very much.

Sincerely,

Associate Legal Advisor
Department of Homeland Security
Immigration and Customs Enforcement
Office of the Principal Legal Advisor—District Court Litigation Division
500 12th Street SW Mailstop 5900
Washington, D.C. 20536
Mobile Phone: (202) 607-
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Thanks. Any details about what happened here?

Sent from my iPhone

On Mar 31, 2022, at 5:25 PM @ice.dhs.gov wrote:

Hi OIL,

Per ERO, this individual is being released from ICE custody today. Attached is the I-831.

Thank you.

[...]

Associate Legal Advisor
Department of Homeland Security
Immigration and Customs Enforcement
Office of the Principal Legal Advisor—District Court Litigation Division
500 12th Street SW Mailstop 5900
Washington, D.C. 20536
Mobile Phone: (202) 607...

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Subject: RE: [EXTERNAL] Fraihat

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Thank you,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From:
Sent: Friday, March 25, 2022 9:48 PM
To:
Cc:
Thank you. I’ve incorporated as best I can and send the attached final correspondence to opposing counsel.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-__

From:
Sent: Friday, March 25, 2022 7:45 PM

To:
Cc:

Subject: RE: [EXTERNAL] Fraihat
Please see ICE’s responses in red:

(b)(5), (b)(6), (b)(7)(C)
Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 25

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Subject: RE: [EXTERNAL] Frihat

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Following up on this please.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-1234

From: Deputy Director
Sent: Thursday, March 24, 2022 2:28 PM
To: Deputy Director
Cc: Deputy Director; Padilla, Kenneth; Loiacono, Adam V; Davis, Mike P

Subject: RE: [EXTERNAL] Frihat

Thanks
In addition, these inquiries required a significant amount of back and forth with various offices in the field, which resulted in delays. However, please our additional responses below in red.

- (b)(5)
Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-__

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From: (b)(6); (b)(7)(C) @usdoj.gov
Sent: Thursday, March 24, 2022 10:52 AM
To: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov;
     (b)(6); (b)(7)(C) @hq.dhs.gov;
Cc: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov; Padilla, Kenneth @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
     (b)(6); (b)(7)(C) @HQ.DHS.GOV; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov.
Thank you.

(b)(6); (b)(7)(C)

Senior Litigation Counsel
U.S. Department of Justice, Civil Division
Office of Immigration Litigation – District Court Section
P.O. Box 888 | Ben Franklin Station | Washington, DC 20044
Direct: (202) 530-6161 Fax: (202) 305-7000 | Email: (b)(6); (b)(7)(C)@usdoj.gov

From: (b)(6); (b)(7)(C)@usdoj.gov
Sent: March 2, 2022 4:58 PM
To: (b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@hq.dhs.gov; (b)(6); (b)(7)(C)@usdoj.gov
Cc: (b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@hq.dhs.gov; (b)(6); (b)(7)(C)@usdoj.gov

Subject: RE: [EXTERNAL] Fraihat

Yes, 60 days.

(b)(6); (b)(7)(C)

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 6161

From: (b)(6); (b)(7)(C)@ice.dhs.gov
Sent: Wednesday, March 02, 2022 4:57 PM
To: (b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@hq.dhs.gov; (b)(6); (b)(7)(C)@usdoj.gov
Cc: (b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@hq.dhs.gov; (b)(6); (b)(7)(C)@usdoj.gov

2022-ICLI-00045 4789
Thank you, I think that would be helpful.

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253

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From: [Email Address]@usdoj.gov
Sent: Wednesday, March 2, 2022 4:55 PM
To: [Email Address]@ice.dhs.gov; [Email Address]@hq.dhs.gov;
Cc: [Email Address]@ice.dhs.gov; [Email Address]@hq.dhs.gov;

Subject: RE: [EXTERNAL] Faihat
Subject: RE: [EXTERNAL] Fraihat

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I can ask, but I’d imagine another 60 days.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From:
Sent: Wednesday, March 02, 2022 4:52 PM
To:
Cc:

Subject: RE: [EXTERNAL] Fraihat
What is the timeframe Plaintiffs are requesting for another extension? I do not see the draft motion attached.

Kind regards,

(b)(6);

(b)(6); (b)(7)(C)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253
(b)(6);

(b)(7)(C)

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Please also see below, opposing counsel’s request for a further continuance of their deadline to seek en banc consideration of the Ninth Circuit’s decision. I’d like to be able to get back to them before the end of the week.

If there is concern about the pace of mediation, I would propose that we could agree to one more extension, but that we would need to see progress in mediation before agreeing to any further extensions?

Thanks,

(b)(6);
(b)(7)(C);
(b)(5)

(b)(6);
(b)(7)(C)

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: (b)(6); (b)(7)(C)
Sent: Wednesday, March 02, 2022 12:59 PM
To: (b)(6); (b)(7)(C)
Cc: @hq.dhs.gov; (b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)
Thank you. I’ve tweaked the footer to mirror the header that you’ve changed and am revising to reflect today’s date.

Adding a few OPLA folks.

Thanks,

Adam V. Loiacono
Deputy Principal Legal Advisor for Enforcement and Litigation
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
Phone: 202-500(b)(6)
From: (b)(6); (b)(7)(C) @usdoj.gov
Sent: Monday, May 23, 2022 10:33 AM
To: (b)(6); (b)(7)(C) @hq.dhs.gov
Cc: Loiacono, Adam V (b)(6); (b)(7)(C) @ice.dhs.gov (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) @hq.dhs.gov
Subject: RE: [EXTERNAL] Fraihat

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(b)(5)

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: (b)(6); (b)(7)(C) @hq.dhs.gov
Sent: Monday, May 23, 2022 10:20 AM
To: (b)(6); (b)(7)(C) @usdoj.gov
Cc: Loiacono, Adam V (b)(6); (b)(7)(C) @ice.dhs.gov (b)(6); (b)(7)(C) @hq.dhs.gov
Subject: FW: [EXTERNAL] Fraihat

I am attaching our revised offer. Note that there may be some flexibility on the duration (currently set at 6 months), but not much flexibility. We’re happy to set up a call to discuss.

Best,

Assistant General Counsel for Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(202) 744-6111
hq.dhs.gov

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From: (b)(6); (b)(7)(C) @usdoj.gov
Sent: Monday, May 23, 2022 10:14 AM
To: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov
Cc: (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov;
     (b)(6); (b)(7)(C) @qsdoj.gov; (b)(6); (b)(7)(C) @hq.dhs.gov;
     (b)(6); (b)(7)(C) @ice.dhs.gov;
     (b)(6); (b)(7)(C) @ice.dhs.gov;
     (b)(6); (b)(7)(C) @ice.dhs.gov;
     (b)(6); (b)(7)(C) @ice.dhs.gov;
     (b)(6); (b)(7)(C) @ice.dhs.gov;
     (b)(6); (b)(7)(C) @ice.dhs.gov;
     (b)(6); (b)(7)(C) @ice.dhs.gov;

Subject: RE: [EXTERNAL] Fraihat

Here is the Zoom info for today.

I would appreciate if I could get a sense of ICE’s thoughts more detailed than “rethinking the approach” by noon today, particularly with regard to any show stopper issues like (I anticipate) any continued obligation to release those subject to mandatory detention authorities.

Thanks,
Thanks.

Correspondence from opposing counsel here. Please let me know ICE’s responses to the bolded questions.
Thanks

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: (b)(6); (b)(7)(C)@ice.dhs.gov>
Sent: Friday, May 20, 2022 11:18 AM
To: (b)(6); (b)(7)(C)@usdoj.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>
Cc: (b)(6); (b)(7)(C)@hq.dhs.gov>; (b)(6); (b)(7)(C)@usdoj.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@usdoj.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)
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@hq.dhs.gov>; (b)(6); (b)(7)(C)@usdoj.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@usdoj.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)
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@hq.dhs.gov>; (b)(6); (b)(7)(C)@usdoj.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)
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@hq.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@usdoj.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@usdoj.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@usdoj.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@usdoj.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@usdoj.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@usdoj.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@usdoj.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@usdoj.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@usdoj.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@usdoj.gov>; (b)(6); (b)(7)(C)
@hq.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)

Subject: RE: [EXTERNAL] Fraihat

Hi,

Both our proposal and potential position on another extension for Plaintiffs to file a petition en banc are currently with the Front Office. We hope to have an update soon.

Kind regards,

(b)(6); (b)(7)(C)
Associate Legal Advisor  
U.S. Immigration and Customs Enforcement  
Office of the Principal Legal Advisor  
District Court Litigation Division  
500 12th Street SW  
Washington, D.C. 20536  
Mobile: (202) 253-4800

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From: @usdoj.gov  
Sent: Friday, May 20, 2022 11:02 AM  
To: @ice.dhs.gov; @ice.dhs.gov  
Cc: @hq.dhs.gov; @usdoj.gov  
Subject: RE: [EXTERNAL] Fraihat

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ICE, despite the ask for a check in yesterday, I have really heard nothing here (other than a side bar question from DHS).
Please get us answers and updates regarding the en banc extension question and the status of comments on Plaintiffs’ latest proposal immediately.

In addition to needing to convey what the government’s position regarding Plaintiffs’ anticipated extension motion, we need to be able to communicate reasonably with opposing counsel and Magistrate Judge Wilner regarding Monday’s mediation – which DOJ is unable to prepare for.
One observation that I’ve been noodling on that may be helpful for ICE’s decision making here.

Please do check in today to let us know where things are, and note that Plaintiffs requested a response by tomorrow and are not unreasonable in wanting to determine if they need to seek a further en banc extension, what they can say with regard to our position, what we all could say with regard to the progress of mediation, and all in time to have a decision from the Ninth Circuit while they approach an important filing deadline for them.

From: (b)(6); (b)(7)(C)
Sent: Wednesday, May 18, 2022 12:47 PM
To: (b)(6); (b)(7)(C); (b)(6); (b)(7)(C)
Cc: (b)(6); (b)(7)(C); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C)
Subject: RE: [EXTERNAL] Fraihat

Folks, just checking in on all of this please.
Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616- 

From: (b)(6); (b)(7)(C)
Sent: Monday, May 16, 2022 2:53 PM
To: @ice.dhs.gov; @hq.dhs.gov; @usdoj.gov
Cc: @ice.dhs.gov; @hq.dhs.gov; @usdoj.gov

Subject: [EXTERNAL] Fraihat

and all,
Hi Jeff,

(b)(5)
Lastly, ICE is available for the mediation session on May 23 from 1pm-3pm ET. Given the upcoming mediation session, could OIL provide responses to ICE by COB tomorrow, 5/17?

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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And on scheduling, both Plaintiffs and the SM indicate that they are available at 10 am PST the morning of 5/23. Can we please confirm and get this scheduled?

Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: (b)(6); (b)(7)(C)
Sent: Monday, May 16, 2022 1:12 PM
To: (b)(6); (b)(7)(C)
Cc: (b)(6); (b)(7)(C)

Subject: RE: [EXTERNAL] Fraihat

(b)(6);

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)
Subject: RE: [EXTERNAL] Fraihat

Thanks.

I've followed up with them, but I understand that both options are still on the table for them.

One element that we discussed re this proposal (which we haven't seen yet), would be agreeing to permit ICE some additional time regarding initial screening and custody determinations (although they indicated that something like 60 days to complete a custody redetermination would be too long).

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: [b](6); [b](7)(C)@ice.dhs.gov
Sent: Monday, May 16, 2022 8:13 AM

To: [b](6); [b](7)(C)@usdoj.gov; (b)(6); [b](7)(C)@ice.dhs.gov
Cc: [b](6); [b](7)(C)@hq.dhs.gov; [b](6); [b](7)(C)@usdoj.gov

Subject: RE: [EXTERNAL] Fraihat

Hi [b](6);

Are Plaintiffs still working on a proposal to potentially not pursue en banc if ICE agrees to some form of status quo (based on your previous email re the pros and cons of another extension), or is this request for another extension an indication that they decided not to propose a proposal like that?

Kind regards,

[b](6);
[b](7)(C)
(b)(6); (b)(7)(C)
Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-
Please see below opposing counsel’s ask for our position on a further en banc extension by COB Monday. I’ve already responded to indicate that we may not be able to get back to them by then. I also don’t share the same sense of urgency that they do, but understand their desire to get a ruling before they have to put more effort into drafting. I also have no clarity on what we could say regarding progress in the mediation at this point. Please let me know what ICE and DHS think so I can send some response by Monday.

If we are going to file another consent extension, we really need to do so ASAP. Tells me that you are still waiting for you’re the agency’s final views. We very much appreciate your efforts in getting an answer. Given the last 9th Circuit order, we will need to be able to tell the Court we are making substantial progress in the negotiations. I would be helpful for you to provide us language you would be comfortable with. And let us know whether you will agree to seeking another 60, or would only agree to 45 or 30.

Could you please get back to us by Monday COB? I feel like we are already late in filing this and want to get it done, if we can.

Thanks,

Sent from my iPhone

On May 13, 2022, at 12:22 PM, @usdoj.gov wrote:

In short, the decision on whether to agree to jointly seek a further extension of Plaintiffs’ en banc deadline is closely tied to ICE and DHS’s interest in continuing to mediate both the COVID-19 and underlying claims of the Plaintiffs’ complaint.
Apologies again for the delay. We will get this to you this afternoon.

Sent from my iPhone

On May 10, 2022, at 2:12 PM, Padilla, Kenneth

(b)(6); (b)(7)(C)

Subject: Re: [EXTERNAL] Fraihat

(b)(6); (b)(7)(C)

Good afternoon.

Following up of previous request, do you have an estimate on when we can expect OIL’s thoughts on agreeing, or not agreeing, to another extension to file the en banc review?

Thanks in advance,

(b)(6); (b)(7)(C)

Acting Deputy Chief, on detail
Office of the Principal Legal Advisor
District Court Litigation Division
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
p: 404-895-0372

https://eserviceregistration.gov/

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From: @usdoj.gov
Sent: Friday, May 6, 2022 12:55 PM
To: @ice.dhs.gov;
Cc: @hq.dhs.gov; Padilla, Kenneth @ice.dhs.gov;
        @ice.dhs.gov;
        @ice.dhs.gov; Ch;
        @ice.dhs.gov; Davis, Mike @ice.dhs.gov;
        @ice.dhs.gov; Loiacono, Adam V
Subject: RE: [EXTERNAL] Fraihat

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Thanks.

I’ll pass that along and we’ll get you something today.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-
From: (b)(6); (b)(7)(C) @ice.dhs.gov>
Sent: Friday, May 06, 2022 12:52 PM
To: (b)(6); (b)(7)(C) @usdoj.gov>
Cc: (b)(6); (b)(7)(C) @hq.dhs.gov>
C: (b)(6); (b)(7)(C) @ice.dhs.gov>

Subject: RE: [EXTERNAL] Fraihat

Hi (b)(6); (b)(7)(C)

ICE could be available for the next mediation session on May 23 from 3-5pm ET. Additionally, we are working to have our responses to Plaintiffs’ proposal to OIL by May 10.

Lastly to follow up, is OIL able to provide any pros and cons on possibly agreeing to another extension to file the en ban petition?

Thank you!

(b)(6);

(b)(6); (b)(7)(C)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253

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Information Act, 5 USC §§ 552(b)(5), (b)(7).

From: (b)(6); (b)(7)(C) @usdoj.gov
Sent: Tuesday, May 3, 2022 10:28 AM
To: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov;
     (b)(6); (b)(7)(C) @ice.dhs.gov;
     (b)(6); (b)(7)(C) @ice.dhs.gov;
     (b)(6); (b)(7)(C) @ice.dhs.gov;
     (b)(6); (b)(7)(C) @ice.dhs.gov;
     (b)(6); (b)(7)(C) @ice.dhs.gov;
     (b)(6); (b)(7)(C) @ice.dhs.gov;
     (b)(6); (b)(7)(C) @ice.dhs.gov;
     (b)(6); (b)(7)(C) @ice.dhs.gov;
     (b)(6); (b)(7)(C) @ice.dhs.gov;
     (b)(6); (b)(7)(C) @ice.dhs.gov;

Cc: (b)(6); (b)(7)(C) @usdoj.gov;
     (b)(6); (b)(7)(C) @hq.dhs.gov;
     (b)(6); (b)(7)(C) @hq.dhs.gov;
     (b)(6); (b)(7)(C) @hq.dhs.gov;
     (b)(6); (b)(7)(C) @hq.dhs.gov;
     (b)(6); (b)(7)(C) @hq.dhs.gov;
     (b)(6); (b)(7)(C) @hq.dhs.gov;
     (b)(6); (b)(7)(C) @hq.dhs.gov;
     (b)(6); (b)(7)(C) @hq.dhs.gov;
     (b)(6); (b)(7)(C) @hq.dhs.gov;

Subject: RE: [EXTERNAL] Fraihat

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and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click
here and follow instructions.

We’ll get you pros and cons re a further extension today.
Thanks,

(b)(6);

(b)(6); (b)(7)(C)

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From: (b)(8); (b)(7)(C) @ice.dhs.gov>
Sent: Monday, May 02, 2022 9:08 AM
To: (b)(6); (b)(7)(C) @hq.dhs.gov> (b)(6); (b)(7)(C) @hq.dhs.gov>
(b)(6); (b)(7)(C) @usdoj.gov> (b)(6); (b)(7)(C) @hq.dhs.gov>
Cc: (b)(6); (b)(7)(C) @hq.dhs.gov> (b)(6); (b)(7)(C) @ice.dhs.gov>
(b)(6); (b)(7)(C) @hq.dhs.gov> (b)(6); (b)(7)(C) @ice.dhs.gov>
(b)(6); (b)(7)(C) @hq.dhs.gov> (b)(6); (b)(7)(C) @ice.dhs.gov>
(b)(6); (b)(7)(C) @hq.dhs.gov> (b)(6); (b)(7)(C) @ice.dhs.gov>
(b)(6); (b)(7)(C) @hq.dhs.gov> (b)(6); (b)(7)(C) @ice.dhs.gov>
(b)(6); (b)(7)(C) @hq.dhs.gov> (b)(6); (b)(7)(C) @ice.dhs.gov>
(b)(6); (b)(7)(C) @hq.dhs.gov> (b)(6); (b)(7)(C) @ice.dhs.gov>
(b)(6); (b)(7)(C) @hq.dhs.gov> (b)(6); (b)(7)(C) @ice.dhs.gov>
Subject: RE: [EXTERNAL] Fraihat

Hi [b](6);

Thank you, we are trying to see which of those slots may work.

In the meantime, can OIL provide insights on the pros and cons for agreeing to another extension for plaintiffs to file a petition en banc for ICE to consider as we elevate?

Kind regards,

(b)(6);

(b)(6); (b)(7)(C)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement  
Office of the Principal Legal Advisor  
District Court Litigation Division  
500 12th Street SW  
Washington, D.C. 20536  
Mobile: (202) 253-\(b)(6)\)

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From: \(b)(6); (b)(7)\)@hq.dhs.gov
Sent: Thursday, April 28, 2022 4:06 PM
To: \(b)(6); (b)(7)\)@usdoj.gov; \(b)(6); (b)(7)\)@ice.dhs.gov; \(b)(6); (b)(7)\)@usdoj.gov; \(b)(6); (b)(7)\)@hq.dhs.gov; \(b)(6); (b)(7)\)@ice.dhs.gov; \(b)(6); (b)(7)\)@ice.dhs.gov; \(b)(6); (b)(7)\)@ice.dhs.gov; \(b)(6); (b)(7)\)@ice.dhs.gov; \(b)(6); (b)(7)\)@ice.dhs.gov; \(b)(6); (b)(7)\)@ice.dhs.gov; 
Cc: \(b)(6); (b)(7)\)@ice.dhs.gov; Padilla, Kenneth \(b)(6); (b)(7)\)@ice.dhs.gov; \(b)(6); (b)(7)\)@hq.dhs.gov; \(b)(6); (b)(7)\)@usdoj.gov; \(b)(6); (b)(7)\)@ice.dhs.gov; \(b)(6); (b)(7)\)@ice.dhs.gov; \(b)(6); (b)(7)\)@ice.dhs.gov; \(b)(6); (b)(7)\)@ice.dhs.gov; \(b)(6); (b)(7)\)@ice.dhs.gov; \(b)(6); (b)(7)\)@ice.dhs.gov; \(b)(6); (b)(7)\)@ice.dhs.gov; 
Subject: RE: [EXTERNAL] Fraihat

I’m looping in \(b)(6); (b)(7)\) who may be plugging into this case after today and until a new immigration deputy comes onboard.

\(b)(6); (b)(7)\)
Deputy General Counsel  
U.S. Department of Homeland Security  

\(202) 836-\(b)(6)\)
So that attempt at scheduling didn’t work. Here’s Plaintiffs’ response.

Any chance we can work with their hours on 5/17, and if not, what works for ICE the following week?

We can meet between 10:30 and 2:00 Pacific on 5/17. I also should clarify that, based on our previous meetings, we’re working under the assumption that this would be a two-hour session.

In the event the 5/17 times won’t work, our availability the week of May 23 is as follows (all times Pacific):

May 23: any time in the afternoon
May 24: 1:00p – 3:00p
May 25: 9:00a – noon
May 26: 11:30a – 2:00p
May 27: 10:30a – 4:00p
Hi [b](6)

Yes, we will work to have the proposal to OIL by 5/11 and we will work on a position on another potential extension of the deadline for Plaintiffs’ to file a petition en banc.

Regarding the next mediations session, ICE’s availability is below.

- Monday (May 16)
- Tuesday between 10 and 2 (May 17)
- Friday from 9 to 3 (May 20)

Kind regards,

[b](6)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-
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From: (b)(6); (b)(7)(C) @usdoj.gov
Sent: Friday, April 22, 2022 12:03 PM
To: (b)(6); (b)(7)(C) @ice.dhs.gov
Cc: (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov
    (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov

Subject: Re: [EXTERNAL] Fraihat

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Thank you.

Will ICE prepared to have your thoughts to us by the 11th?

And can ICE and DHS get together on views on a further extension of the en banc deadline, which is coming up again in June (so we’re likely going to be asked for our position before we sit down with the mediator again).

Sent from my iPad
On Apr 22, 2022, at 11:21 AM  

Hi  

ICE request that the mediation session be the third week of May (week of May 16), given the amount of review the proposal would need and in order to have the most productive mediation session. We are gathering availability so we can propose the dates.

Kind regards,

Associate Legal Advisor  
U.S. Immigration and Customs Enforcement  
Office of the Principal Legal Advisor  
District Court Litigation Division  
500 12th Street SW  
Washington, D.C. 20536  
Mobile: (202) 253-7222  

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ICE, does this proposed timeline work for you? I’d like to confirm with opposing counsel and the Magistrate Judge, thanks.

As a suggestion, if we were to propose a day to meet with Plaintiffs the week of May 9, we could build in a few more days for ICE to develop a response – say by May 3, which we could review/discuss and send over to Plaintiffs by May 6.
Okay, thank you. ICE is considering if the timeline is feasible and will follow up.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-
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Under Plaintiffs’ proposed timeline, we would need ICE’s responses sent to OIL by the 29th to give us a few days to review and clarify with ICE, to then transmit to opposing counsel sometime during the following week of May 2, in time for a mediation session that week. It’s an ambitious timeline to say the least.

Best,

(b)(6);
Hi (b)(6);

Thank you for sending. Would the goal be to have ICE’s responses sent to OIL by April 29 or to Plaintiffs by April 29, so to OIL a few days before then?

Kind regards,

(b)(6);

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253 (b)(6);

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Good morning [b](6). At last long, attached is Plaintiffs’ COVID-related settlement proposal and a note that they are awaiting two items from us, see below. Also attached is a Word version of their proposal to make internal comments easier. We are just beginning to review here as well.

Thank you,

[b](6).

From: [b](6); [b](7)(C) @ice.dhs.gov

Sent: April 15, 2022 5:43 PM

To: [b](6); [b](7)(C) @usdoj.gov

Cc: [b](6); [b](7)(C) @usdoj.gov; Davis, Mike P <k@ice.dhs.gov> [b](6); [b](7)(C) @ice.dhs.gov; Lolacono, Adam V [b](6); [b](7)(C) @usdoj.gov; @ice.dhs.gov

Subject: RE: [EXTERNAL] Fraihat

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Hi [b](6); [b](7)(C)

Kind regards,
[b](6); [b](7)(C)

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Subject: RE: [EXTERNAL] Faihat

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Folks,

Please note that we still owe opposing counsel a response regarding the process for negotiating the claims in the complaint itself. I've made a verbal suggestion of what our response could look like but we haven't heard further from ICE.
Thank you.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: @ice.dhs.gov>
Sent: Thursday, April 07, 2022 10:05 AM
To: @usdoj.gov>
Cc: @hq.dhs.gov>

Hi [b](b)(6);

Please find below further information from ERO concerning the detainee. Apologies for the delay.
Please let us know if you have any additional questions. Thank you.

Sincerely,

(b)(6); (b)(7)(C)
Associate Legal Advisor
Department of Homeland Security
Immigration and Customs Enforcement
Office of the Principal Legal Advisor—District Court Litigation Division
500 12th Street SW Mailstop 5900
Washington, D.C. 20536
Mobile Phone: (202) 607

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(b)(6); (b)(7)(C)

Subject: RE: [EXTERNAL] Fraihat

Thank you very much.

Sincerely,

Associate Legal Advisor
Department of Homeland Security
Immigration and Customs Enforcement
Office of the Principal Legal Advisor—District Court Litigation Division
500 12th Street SW Mailstop 5900
Washington, D.C. 20536
Mobile Phone: (202) 607-8181

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From: [Email Address]
Sent: Thursday, March 31, 2022 6:51 PM
To: [Email Address]
Cc: [Email Address]
Thanks. Any details about what happened here?

Sent from my iPhone

On Mar 31, 2022, at 5:25 PM (b)(6); (b)(7)(C) wrote:

Hi OIL,

Per ERO, this individual is being released from ICE custody today. Attached is the I-831.

Thank you.

Associate Legal Advisor

Department of Homeland Security

Immigration and Customs Enforcement

Office of the Principal Legal Advisor—District Court Litigation Division

500 12th Street SW Mailstop 5900

Washington, D.C. 20536

Mobile Phone: (202) 607-3...
Subject: RE: [EXTERNAL] Fraihat

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Please find attached one additional allegation of Fraihat noncompliance, for which Plaintiffs request a response by March 31. The detainee reference in this email is [b](5).

In reviewing the situation and responding, can ICE [b](5)

Please let know if there are any questions or clarification needed before sending a response over for OIL’s review.

Please get us a response by noon on Thursday, or a heads up when you expect to send it.

Thank you,
Thank you. I’ve incorporated as best I can and send the attached final correspondence to opposing counsel.
Kind regards,

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)
Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-(b)(6)

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Following up on this please.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From:
Sent: Thursday, March 24, 2022 2:28 PM
To:
Cc:
Ramus
Subject: RE: [EXTERNAL] Fraihat

Thanks

(b)(6);

(b)(6);

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-__

From:N
Sent: Thursday, March 24, 2022 2:19 PM
To:[b](6);[b](7)[C]
Cc:[b](6);[b](7)[C]
Subject: RE: [EXTERNAL] Fraihat
Kind regards,

(b)(6); (b)(7)(C);

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-(b)(6); (b)(7)(C)

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From: ________________________ @usdoj.gov
Sent: Thursday, March 24, 2022 10:52 AM

2022-ICLI-00045 4839
Subject: RE: [EXTERNAL] Frihat

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Thanks,

Deputy Director

To: @ice.dhs.gov; @usdoj.gov;
Cc: @hq.dhs.gov;

(b)(6); (b)(7)(C)

Thanks,

(b)(6); (b)(7)(C)
ICE accepts the suggested edits in blue from OIL. In addition, please see ICE’s responses to OIL’s questions in green below.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-
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From: (b)(6); (b)(7) @usdoj.gov
Sent: Monday, March 21, 2022 6:42 PM
To: (b)(6); (b)(7) @ice.dhs.gov; (b)(6); (b)(7) @ice.dhs.gov; (b)(6); (b)(7) @hq.dhs.gov
Cc: (b)(6); (b)(7) @ice.dhs.gov
Subject: RE: [EXTERNAL] Fraihat

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Thanks you and all,

OIL’s proposed additions are below in below, and question are in blue and highlighted. Nothing too major here – we’d like to turn this back to Plaintiffs by tomorrow. Please let us know if that will be possible.

(b)(6)

(b)(6); (b)(7)

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616- (b)(6)
From: (b)(6); (b)(7)(C) @ice.dhs.gov>
Sent: Friday, March 18, 2022 5:56 PM
To: (b)(6); (b)(7)(C) @usdoj.gov>
Cc: (b)(6); (b)(7)(C) @hq.dhs.gov>

Subject: RE: [EXTERNAL] Fraihat

Please see below for ICE’s responses in red. Please note that two requests below need additional time for ICE to finalize a response.
(b)(5); (b)(7)(C); (b)(6)
(b)(5); (b)(6); (b)(7)(C)
(b)(5); (b)(6); (b)(7)(C)
Kind regards,

(b)(6)

(b)(6); (b)(7)(C)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253 (b)(6);

(b)(6); (b)(7)(C)

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From: (b)(6); (b)(7)(C) @usdoj.gov
Sent: Monday, March 14, 2022 9:19 AM
To: (b)(6); (b)(7)(C) @usdoj.gov, (b)(6); (b)(7)(C) @ice.dhs.gov, (b)(6); (b)(7)(C) @hq.dhs.gov
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Good morning.

In addition to opposing counsel’s settlement related questions for tomorrow, they have also sent along a series of questions/concerns regarding PI compliance that I have attached here. Please let us know if there is anything in here that ICE would like to discuss initially, but we would otherwise request consolidated responses by COB Friday, or a heads up by COB Thursday if responses are taking longer to assemble and draft.

Thank you,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-
Subject: RE: [EXTERNAL] Fraihat

Please find Plaintiffs’ follow-up questions attached. Please have consolidated and reviewed responses back to OIL by COB Tuesday 3/15, so that we can review and get back to Plaintiffs by COB on Wednesday 3/16.

Please also respond to let us know where DHS and ICE are on Plaintiffs’ request regarding an extension of their en banc deadline so that we can get back to them with something today, even if not a final decision.

Thank you.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: (b)(6); (b)(7)(C)

Sent: Wednesday, March 09, 2022 7:37 AM

Tq: (b)(6); (b)(7)(C)

Cc: (b)(6); (b)(7)(C)
Subject: RE: [EXTERNAL] Fraihat

Good morning, ICE –

Thank you for the support preparing for and during Monday’s mediation session.

We scheduled the next mediation session for April 12, 2022, 11am ET, but Judge Wilner was clear that he did not want to gather everyone again if the parties were not ready to make substantive progress by that date.

Lastly, a reminder that we need DHS and ICE positions on Plaintiffs’ extension request on the en banc rehearing deadline.

Thank you,

(b)(6)

(b)(6); (b)(7)(C)
Senior Litigation Counsel
U.S. Department of Justice, Civil Division
Office of Immigration Litigation – District Court Section
P.O. Box 888 | Ben Franklin Station | Washington, DC 20044
Direct: (202) 532(b)(6); Fax: (202) 305-7000 | Email: bhrex@usdoj.gov

From: (b)(6); (b)(7)(C) @usdoj.gov
Sent: March 2, 2022 4:58 PM
To: (b)(6); (b)(7)(C) @ice.dhs.gov>; (b)(6); (b)(7)(C) @hq.dhs.gov>
Cc: (b)(6); (b)(7)(C) @usdoj.gov>; (b)(6); (b)(7)(C) @hq.dhs.gov>

2022-ICLI-00045  4855
Yes, 60 days.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From: b@ice.dhs.gov
Sent: Wednesday, March 02, 2022 4:57 PM
To: b@ice.dhs.gov
Cc: b@ice.dhs.gov; Padilla, Kenneth b@ice.dhs.gov;
b@ice.dhs.gov

Hi,

Thank you, I think that would be helpful.

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253 (b)(6).

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From: (b)(6); (b)(7); @usdoj.gov>
Sent: Wednesday, March 2, 2022 4:55 PM
To: (b)(6); (b)(7); @ice.dhs.gov;
    (b)(6); (b)(7); @hq.dhs.gov;
    (b)(6); (b)(7); @ice.dhs.gov;
    (b)(6); (b)(7); @hq.dhs.gov;
    (b)(6); (b)(7); @hq.dhs.gov;
    (b)(6); (b)(7); @usdoj.gov;
    (b)(6); (b)(7); @ice.dhs.gov;
    (b)(6); (b)(7); @hq.dhs.gov;
    (b)(6); (b)(7); @hq.dhs.gov; Padilla, Kenneth (b)(6); (b)(7); @ice.dhs.gov; Loriacono, Adam V (b)(6); (b)(7); @ice.dhs.gov;
    (b)(6); (b)(7); @hq.dhs.gov;
    (b)(6); (b)(7); @hq.dhs.gov;
    (b)(6); (b)(7); @hq.dhs.gov;
    (b)(6); (b)(7); @hq.dhs.gov;
    (b)(6); (b)(7); @hq.dhs.gov;
    (b)(6); (b)(7); @hq.dhs.gov;
    (b)(6); (b)(7); @hq.dhs.gov;
    (b)(6); (b)(7); @hq.dhs.gov;
    (b)(6); (b)(7); @hq.dhs.gov; Davis, Mike P (b)(6); @ice.dhs.gov>
Subject: RE: [EXTERNAL] Fraihat

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I can ask, but I’d imagine another 60 days.

(b)(6); (b)(7)

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616 (b)(6); (b)(7)

From: (b)(6); (b)(7); @ice.dhs.gov>
Sent: Wednesday, March 02, 2022 4:52 PM
Hi,

What is the timeframe Plaintiffs are requesting for another extension? I do not see the draft motion attached.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-5(b)(6);

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From: (b)(6); (b)(7)(C)@usdoj.gov
Sent: Wednesday, March 2, 2022 3:34 PM
To: (b)(6); (b)(7)(C)@hq.dhs.gov
Cc: (b)(6); (b)(7)(C)@ice.dhs.gov

Subject: RE: [EXTERNAL] Fraihat

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Please also see below, opposing counsel’s request for a further continuance of their deadline to seek en banc consideration of the Ninth Circuit’s decision. I’d like to be able to get back to them before the end of the week.

If there is concern about the pace of mediation, I would propose that we could agree to one more extension, but that we would need to see progress in mediation before agreeing to any further extensions?

Thanks,

(b)(6)

I hope you are doing well. The current deadline for filing a petition for rehearing en banc is April 5, so we would like to get another consent motion for an extension on file next week to allow the mediation efforts to keep proceeding. It seems like Judge Wilner has been helpful and both sides feel that mediation has been productive so far. Please let us know if the attached motion is acceptable to ICE.

Thanks,

(b)(8)
Please find below Plaintiffs’ response. Please confer and let me know what ICE/DHS prefer. If past practice is any guide, I would recommend a response along these lines:

- (b)(5)

- [b][b] and please feel free to loop in your team.

Thank you for the below information. We will not have time to prepare written responses ahead of our March 7 meeting with your team and Judge Wilner, but we do think a meeting is still worthwhile and will be prepared to discuss the information you’ve shared at that meeting, with a particular focus on: the detention proposal, the potential revised guidance regarding notice to class members, and consideration of subclass members held under 236c. We will likely primarily seek clarification and more information so that we can fully consider proposals or counter.
I will also under separate cover send you a proposal for moving forward with segregation and disability discussions after we wrap up with the PI, which will hopefully assuage your and your clients’ concern about addressing the whole case. These are the next two topics on our list of topics to cover and we think they can be handled in a similar format, which we will propose. I will get that to you shortly.

Many thanks

[(b)(6)]

(b)(6); (b)(7)(C)

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-1246

From: (b)(6); (b)(7)(C)
Sent: Friday, February 25, 2022 12:35 PM
To: (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov;
Cc: (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov
(b)(6); (b)(7)(C) @ice.dhs.gov
(b)(6); (b)(7)(C) @ice.dhs.gov
(b)(6); (b)(7)(C) @ice.dhs.gov
(b)(6); (b)(7)(C) @ice.dhs.gov
(b)(6); (b)(7)(C) @ice.dhs.gov
(b)(6); (b)(7)(C) @ice.dhs.gov
(b)(6); (b)(7)(C) @ice.dhs.gov
(b)(6); (b)(7)(C) @ice.dhs.gov
(b)(6); (b)(7)(C) @ice.dhs.gov
(b)(6); (b)(7)(C) @ice.dhs.gov
(b)(6); (b)(7)(C) @ice.dhs.gov

Subject: RE: [EXTERNAL] Fraihat

Thanks everyone.

[(b)(6); (b)(7)(C)]

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-1246

From: (b)(6); (b)(7)(C) @hq.dhs.gov
Sent: Friday, February 25, 2022 11:48 AM
To: (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov;
Subject: RE: [EXTERNAL] Faihat

(b)(6): please see a few edits in the attached.

Best,

(b)(6):

(b)(6); (b)(7)(C)

Assistant General Counsel for Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(202) 740 (b)(6))

(b)(6): @hq.dhs.gov

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From: (b)(6); (b)(7)(C) @hq.dhs.gov
Sent: Thursday, February 24, 2022 9:50 PM
To: (b)(6); (b)(7)(C) @hq.dhs.gov
Cc: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov;
   (b)(6); (b)(7)(C) @ HQ.DHS.GOV; Padilla, Kenneth (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C)
   (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov; Loiacono, Adam V (b)(6); (b)(7)(C) @ice.dhs.gov; Davis, Mike P (b)(6); @ice.dhs.gov;
Hi Fraihat,

Not sure if my earlier email went through. We are finalizing our input. You should hear back from [my absence.]

Kind regards,

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security

*(202) 282-2083 (202) 853-4000
zhq.dhs.gov

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Subject: Re: [EXTERNAL] Fraihat

Anything on this folks? Opposing counsel is checking in on our status so they can move forward with their revised proposal.

Sent from my iPad

On Feb 24, 2022, at 11:18 AM, @usdoj.gov wrote:

Thanks for the call this morning. Please find attached a draft email for opposing counsel that attempts to distill our current positions. I appreciate any comments/edits that can be provided by COB, or let me know if you’d need longer.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From: @hq.dhs.gov
Sent: Wednesday, February 23, 2022 2:55 PM
To: @ice.dhs.gov
Cc: @ice.dhs.gov; Padilla, Kenneth

Subject: RE: [EXTERNAL] Fraihat
Thanks, I will coordinate with schedule and link up with ICE to determine a time.

Kind regards,

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(o) (202) 282-(b)[8] (m) (202) 853-(b)[8]
(b)(6); (b)(7)(C) @hq.dhs.gov

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From: (b)(6); (b)(7)(C) buso@usdoj.gov
Sent: Wednesday, February 23, 2022 2:50 PM
To: (b)(6); (b)(7)(C) @hq.dhs.gov
Cc: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov; Padilla, Kenneth
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.HQ,GOV; (b)(6); (b)(7)(C) @ice.dhs.gov
Subject: Re: [EXTERNAL] Fraihat

Thank you. I think a call is still warranted to clear a few of our specific asks up. Can you please propose a time that works tomorrow?
On Feb 23, 2022, at 11:32 AM, (b)(6); (b)(7)(C) wrote:

Hi (b)(6).

Attached please find consolidated/updated input from DHS + ICE and let us know if there’s any more follow up needed before responding. Thanks for your patience.

Kind regards,

(b)(6); (b)(7)(C)
Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(o) (202) 282; (m) (202) 853 (b)(6);
(b)(6); (b)(7)(C) hq.dhs.gov

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Subject: Re: [EXTERNAL] Fraihat

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Thanks, and I see that the call was just cancelled. Should we still expect updates today, which we will then need to digest and get back to opposing counsel.

Sent from my iPhone

On Feb 22, 2022, at 9:52 AM @hq.dhs.gov wrote:

Friends—

Flagging that DHS and ICE are working on revised responses for DOJ’s review and anticipate canceling this call. We will follow up shortly.

Kind regards,

(b)(6); (b)(7)(C)

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(a) (202) 282-(b)(6); (m) (202) 853-(b)(6);
(b)(6); (b)(7)(C) @hq.dhs.gov

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<Fraihat Draft Responses to OIL re Plaintiffs Mediation Follow Ups 2.22.22 (002) (223 22 Updated ICE DHS Input).docx>
<Fraihat 2.24 Draft Email to Counsel.docx>
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Thanks much.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-8522

Adding a few OPLA folks.

Thanks,

Adam V. Loiacono
Deputy Principal Legal Advisor for Enforcement and Litigation
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
Iphone: 202-500-8625
CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click here and follow instructions.

Thanks. As currently marked re privilege I would appear to be prohibited from sharing this with opposing counsel in this form or other substance. Can you please confirm what I may share with them, and tweak the headers as needed if I’m cleared to send this counter?

Also, would there

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: (b)(6); (b)(7)(C) @hq.dhs.gov
Sent: Monday, May 23, 2022 10:20 AM
To: (b)(6); (b)(7)(C) @usdoj.gov
Cc: Loiacono, Adam V (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) hq.dhs.gov>
Subject: FW: [EXTERNAL] Fraihat

I am attaching our revised offer. Note that

We’re happy to set up a call to discuss.

Best,

Assistant General Counsel for Litigation
Legal Counsel Division
From: [redacted] @usdoj.gov
Sent: Monday, May 23, 2022 10:14 AM
To: [redacted] @ice.gov
Cc: [redacted] @hq.dhs.gov; [redacted] @hq.dhs.gov; [redacted] @ice.gov;
      [redacted] @ice.gov; Padilla, Kenneth [redacted] @ice.gov; [redacted] @ice.gov; [redacted] @ice.gov;
      [redacted] @ice.gov; [redacted] @ice.gov; [redacted] @usdoj.gov;
Subject: RE: [EXTERNAL] Fraiha

Here is the Zoom info for today.

I would appreciate if I could get a sense of ICE’s thoughts more detailed than “rethinking the approach” by noon today, particularly with regard to any show stopper issues like (I anticipate) any continued obligation to release those subject to mandatory detention authorities.

Thanks,
Hi there,

Judge Michael R. Wilner is inviting you to a scheduled ZoomGov meeting.

**Join Zoom Meeting**

Meeting URL: 
(b)(5); (b)(7)(C)

Meeting ID: 
Passcode: 

**Join by Telephone**

For higher quality, dial a number based on your current location.

Dial:

US: 
(b)(6); (b)(7)(C)

**International numbers**

**Join from an H.323/SIP room system**

H.323: 
(b)(6); (b)(7)(C)

SIP: 
Passcode: 

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(b)(6); (b)(7)(C)

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616- (b)(6);
Thank you.

Correspondence from opposing counsel here. Please let me know ICE’s responses to the bolded questions.

Hi,

If you could please write back to Judge Wilner ASAP to see if Monday 5/23 10 am PT still works for him, explaining the delay in closing the loop with him, and cc’ing me, I’d be grateful.

On the extension motion, my team really can’t afford any further delay. We’d love to be able to file it with your clients’ consent and to ask for an amount of time that’s consistent with your clients’ needs in considering our revised proposal (e.g., 30, 45, or 60 days). If you can assure us that you’ll have an answer on the extension motion ready for us by Monday morning, we can hold off filing before then. If you can’t assure us of that, then we’re going to need to go ahead and file today. Either way, please let me know ASAP today.

Additionally, my team would be grateful to know ASAP any questions or concerns your clients have so far about the revised proposal, ideally ahead of the parties’ next meeting with Judge Wilner. Are there any you can identify? What, otherwise, do you propose for an agenda for the next meeting with Judge Wilner? Please let me know ASAP.
I’m available for a call today, if that’d be helpful. If you’d like to talk, please let me know when works for you.

If Judge Wilner can’t meet with us on Monday, I’ll update him about the status of what’s been going on between the parties.

Thanks

From: (b)(6); (b)(7)(C) @ice.dhs.gov
Sent: Friday, May 20, 2022 11:18 AM
To: (b)(6); (b)(7)(C) @usdoj.gov
Cc: (b)(6); (b)(7)(C) @hq.dhs.gov

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616 (b)(8)

Subject: RE: [EXTERNAL] Fraihat

Hi (b)(6);

Both our proposal and potential position on another extension for Plaintiffs to file a petition en banc are currently with the Front Office. We hope to have an update soon.

Kind regards,

(b)(6);

(b)(6); (b)(7)(C)
ICE, despite the ask for a check in yesterday, I have really heard nothing here (other than a side bar question from DHS).
Please get us answers and updates regarding the en banc extension question and the status of comments on Plaintiffs’ latest proposal immediately.

In addition to needing to convey what the government’s position regarding Plaintiffs’ anticipated extension motion, we need to be able to communicate reasonably with opposing counsel and Magistrate Judge Wilner regarding Monday’s mediation – which DOJ is unable to prepare for.
One observation that I’ve been noodling on that may be helpful for ICE’s decision making here.

Please do check in today to let us know where things are, and note that Plaintiffs requested a response by tomorrow and are not unreasonable in wanting to determine if they need to seek a further en banc extension, what they can say with regard to our position, what we all could say with regard to the progress of mediation, and all in time to have a decision from the Ninth Circuit while they approach an important filing deadline for them.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From: (b)(6); (b)(7)(C)
Sent: Wednesday, May 18, 2022 12:47 PM
To: (b)(6); (b)(7)(C); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C)
Cc: (b)(6); (b)(7)(C); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C)

Folks, just checking in on all of this please.
Thanks,

(b)(6);

(b)(6); (b)(7)(C)

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616 (b)(8)

From: (b)(6); (b)(7)(C)

Sent: Monday, May 16, 2022 2:53 PM

To: (b)(6); (b)(7)(C)@ice.dhs.gov> (b)(6); (b)(7)(C)@ice.dhs.gov>

Cc: (b)(6); (b)(7)(C)@ice.dhs.gov>

(b)(6); (b)(7)(C)@ice.dhs.gov>

Subject: RE: [EXTERNAL] Fraihat

(b)(6); and all, (b)(7)(C)
From: (b)(6); (b)(7)(C) @ice.dhs.gov
Sent: Monday, May 16, 2022 1:49 PM
To: (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @ice.dhs.gov
Cc: (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @ice.dhs.gov

Subject: RE: [EXTERNAL] Fraihat

Hi (b)(6); (b)(7)(C)

After internal discussions, ICE has a few additional questions for OIL’s consideration and we kindly request legal counsel on next steps, which are consolidated below:

(b)(5)
Kind regards,

(b)(6);

(b)(6); (b)(7)(C)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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From (b)(6); (b)(7)(C) @usdoj.gov>
Sent: Monday, May 16, 2022 1:28 PM
To: (b)(6); (b)(7)(C) @ice.dhs.gov>; (b)(6); (b)(7)(C) @ice.dhs.gov>
Cc: (b)(6); (b)(7)(C) @hq.dhs.gov>; (b)(6); (b)(7)(C) @hq.dhs.gov>
            (b)(6); (b)(7)(C) @usdoj.gov> (b)(6); (b)(7)(C)
            (b)(6); (b)(7)(C) @hq.dhs.gov>
            (b)(6); (b)(7)(C) @ice.dhs.gov>
            (b)(6); (b)(7)(C) @usdoj.gov> (b)(6); (b)(7)(C)
            { (b)(6); (b)(7)(C) @ice.dhs.gov> (b)(6); (b)(7)(C) @ice.dhs.gov>
            (b)(6); (b)(7)(C) @ice.dhs.gov>
            { (b)(6); (b)(7)(C) @ice.dhs.gov>
            (b)(6); (b)(7)(C) @ice.dhs.gov> (b)(6); (b)(7)(C)
            (b)(6); (b)(7)(C) @ice.dhs.gov> (b)(6); (b)(7)(C)
Subject: RE: [EXTERNAL] Fraihat

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And on scheduling, both Plaintiffs and the SM indicate that they are available at 10 am PST the morning of 5/23. Can we please confirm and get this scheduled?

Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From:

Sent: Monday, May 16, 2022 1:12 PM
Thanks

I've followed up with them, but I understand that both options are still on the table for them.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616

From: [ICE Member]
Sent: Monday, May 16, 2022 8:13 AM
To: [ICE Member]
Cc: [ICE Member]

Subject: RE: [EXTERNAL] Fraihat

Hi

Kind regards,

Please see below opposing counsel’s ask for our position on a further en banc extension by COB Monday. Please let me know what ICE and DHS think so I can send some response by Monday.

If we are going to file another consent extension, we really need to do so ASAP. tells me that you are still waiting for you’re the agency’s final views. We very much appreciate your efforts in getting an answer. Given the last 9th Circuit order, we will need to be able to tell the Court we are making substantial progress in the negotiations. I would be helpful for you to provide us language you would be comfortable with. And let us know whether you will agree to seeking another 60, or would only agree to 45 or 30.

Could you please get back to us by Monday COB? I feel like we are already late in filing this and want to get it done, if we can.

Thanks,

Sent from my iPhone

On May 13, 2022, at 12:22 PM, > wrote:
Apologies again for the delay. We will get this to you this afternoon.

Sent from my iPhone

On May 10, 2022, at 2:12 PM, Padilla, Kenneth (b)(6); (b)(7)@dhs.gov wrote:

Good afternoon (b)(6);
Following up on (b)(6): previous request, do you have an estimate on when we can expect OIl’s thoughts on agreeing, or not agreeing, to another extension to file the en banc review?

Thanks in advance,
(b)(6);

Acting Deputy Chief, on detail
Office of the Principal Legal Advisor
District Court Litigation Division
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
p: 404-899-2118 (b)(6); (b)(7)
c: 703-200-1293

https://eserviceregistration.ice.gov/

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From: (b)(6); (b)(7)(C) @usdoj.gov
Sent: Friday, May 6, 2022 12:55 PM
To: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov
Cc: (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @hq.dhs.gov; Padilla, Kenneth (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @HQ.DHS.GOV; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @hq.dhs.gov; Davis, Mike P (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
Subject: RE: [EXTERNAL] Fraihat

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Thanks

I’ll pass that along and we’ll get you something today.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-
Hi (b)(6)

ICE could be available for the next mediation session on May 23 from 3-5pm ET. Additionally, we are working to have our responses to Plaintiffs’ proposal to OIL by May 10.

Lastly to follow up, is OIL able to provide any pros and cons on possibly agreeing to another extension to file the en banc petition?

Thank you!

(b)(6)

(b)(6); (b)(7)(C)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 15th Street SW
Washington, D.C. 20536
Mobile: (202) 253-
From: (b)(6); (b)(7)(C) @usdoj.gov
Sent: Tuesday, May 3, 2022 10:28 AM
To: (b)(5); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov
Cc: (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @hq.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov
Subject: RE: [EXTERNAL] Fraihat

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here and follow instructions.

We’ll get you pros and cons re a further extension today.
(b)(6); (b)(7)(C)

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: (b)(8); (b)(7)(C)@ice.dhs.gov
Sent: Monday, May 02, 2022 9:08 AM

Tq: (b)(6); (b)(7)(C)@hq.dhs.gov; (b)(6); (b)(7)(C)
(b)(6); (b)(7)(C)@usdoj.gov (b)(6); (b)(7)(C)@hq.dhs.gov
Cc: (b)(6); (b)(7)(C)@usdoj.gov; (b)(6); (b)(7)(C)@hq.dhs.gov;
(b)(6); (b)(7)(C)@hq.dhs.gov; (b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)
Subject: RE: [EXTERNAL] Fraihat

H

(b)(6); (b)(7)(C)

Thank you, we are trying to see which of those slots may work.

In the meantime, can OIL provide insights on the pros and cons for agreeing to another extension for plaintiffs to file a petition en banc for ICE to consider as we elevate?

Kind regards,
(b)(6);

(b)(6); (b)(7)(C)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-[(b)(8)];

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From: (b)(6); (b)(7)(C)@hq.dhs.gov
Sent: Thursday, April 28, 2022 4:06 PM
To: (b)(6); (b)(7)(C)@usdoj.gov
Cc: (b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@hq.dhs.gov;
(b)(6); (b)(7)(C)@usdoj.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@hq.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov;
(b)(6); (b)(7)(C)@ice.dhs.gov;

Subject: RE: [EXTERNAL] Fraihat

I'm looping [(b)(6); (b)(7)(C)] who may be plugging into this case after today and until a new immigration deputy comes onboard.

[(b)(6); (b)(7)(C)]
Deputy General Counsel
U.S. Department of Homeland Security

(202) 836-[(b)(6); (b)(7)(C)]
From: (b)(6); (b)(7)(C) [b]@usdoj.gov
To: (b)(6); (b)(7)(C) [a]@ice.dhs.gov
Cc: (b)(6); (b)(7)(C) [a]@usdoj.gov; (b)(6); (b)(7)(C) [a]@hq.dhs.gov; (b)(6); (b)(7)(C) [a]@ice.dhs.gov

Subject: RE: [EXTERNAL] Fraihat

So that attempt at scheduling didn’t work. Here’s Plaintiffs’ response.

Any chance we can work with their hours on 5/17, and if not, what works for ICE the following week?

We can meet between 10:30 and 2:00 Pacific on 5/17. I also should clarify that, based on our previous meetings, we’re working under the assumption that this would be a two-hour session.

In the event the 5/17 times won’t work, our availability the week of May 23 is as follows (all times Pacific):

May 23: any time in the afternoon
May 24: 1:00p – 3:00p
May 25: 9:00a – noon
May 26: 11:30a – 2:00p
May 27: 10:30a – 4:00p

Deputy Director
Office of Immigration Litigation
Hi (b)(6):

Yes, we will work to have the proposal to OIL by 5/11 and we will work on a position on another potential extension of the deadline for Plaintiffs’ to file a petition en banc.

Regarding the next mediations session, ICE’s availability is below.

- Monday (May 16)
- Tuesday between 10 and 2 (May 17)
- Friday from 9 to 3 (May 20)

Kind regards,

(b)(6):

(b)(8); (b)(7)(C)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-
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From: (h)(6); (h)(7)(C) @usdoj.gov
Sent: Friday, April 22, 2022 12:03 PM
To: (b)(6); (b)(7)(C) @ice.dhs.gov
Cc: (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
Subject: Re: [EXTERNAL] Fraihat

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Thank you.

Will ICE prepared to have your thoughts to us by the 11th?

And can ICE and DHS get together on views on a further extension of the en banc deadline, which is coming up again in June (so we’re likely going to be asked for our position before we sit down with the mediator again).

Sent from my iPad
On Apr 22, 2022, at 11:21 AM, (b)(6); (b)(7)(C) @ice.dhs.gov wrote:

H- (b)(6).

ICE request that the mediation session be the third week of May (week of May 16), given the amount of review the proposal would need and in order to have the most productive mediation session. We are gathering availability so we can propose the dates.

Kind regards,

(b)(6).

(b)(6); (b)(7)(C)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253 (b)(6);

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From: (b)(8); (b)(7)(C) @usdoj.gov
Sent: Friday, April 22, 2022 11:00 AM
To: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov
Cc: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov

(b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @usdoj.gov
(b)(6); (b)(7)(C) @hq.dhs.gov;
(b)(6); (b)(7)(C) @usdoj.gov
(b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @usdoj.gov
(b)(6); (b)(7)(C) @hq.dhs.gov;
(b)(6); (b)(7)(C) @usdoj.gov
(b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @usdoj.gov
(b)(6); (b)(7)(C) @hq.dhs.gov;
(b)(6); (b)(7)(C) @usdoj.gov
(b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @usdoj.gov
(b)(6); (b)(7)(C) @hq.dhs.gov;
(b)(6); (b)(7)(C) @usdoj.gov
(b)(6); (b)(7)(C) @hq.dhs.gov;
(b)(6); (b)(7)(C) @usdoj.gov
(b)(6); (b)(7)(C) @hq.dhs.gov;
(b)(6); (b)(7)(C) @usdoj.gov
(b)(6); (b)(7)(C) @hq.dhs.gov;
(b)(6); (b)(7)(C) @usdoj.gov
(b)(6); (b)(7)(C) @hq.dhs.gov;
(b)(6); (b)(7)(C) @usdoj.gov
(b)(6); (b)(7)(C) @hq.dhs.gov;
(b)(6); (b)(7)(C) @usdoj.gov
(b)(6); (b)(7)(C) @hq.dhs.gov;
(b)(6); (b)(7)(C) @usdoj.gov
(b)(6); (b)(7)(C) @hq.dhs.gov;
(b)(6); (b)(7)(C) @usdoj.gov
(b)(6); (b)(7)(C) @hq.dhs.gov;
(b)(6); (b)(7)(C) @usdoj.gov
(b)(6); (b)(7)(C) @hq.dhs.gov;
(b)(6); (b)(7)(C) @usdoj.gov
(b)(6); (b)(7)(C) @hq.dhs.gov;
(b)(6); (b)(7)(C) @usdoj.gov

ICE, does this proposed timeline work for you? I’d like to confirm with opposing counsel and the Magistrate Judge, thanks.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From:  
Sent: Tuesday, April 19, 2022 12:27 PM  
To:  
Cc:  

As a suggestion, if we were to propose a day to meet with Plaintiffs the week of May 9, we could build in a few more days for ICE to develop a response – say by May 3, which we could review/discuss and send over to Plaintiffs by May 6.
From: (b)(6); (b)(7)(C) @ice.dhs.gov  
Sent: Tuesday, April 19, 2022 12:23 PM  
To: (b)(8); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; Padilla, Kenneth (b)(6); (b)(7)(C) @ice.dhs.gov  
Cc: (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov  
Subject: RE: [EXTERNAL] Fraihat

Okay, thank you. ICE is considering if the timeline is feasible and will follow up.

Kind regards,

(b)(6)

(b)(6); (b)(7)(C)

Associate Legal Advisor  
U.S. Immigration and Customs Enforcement  
Office of the Principal Legal Advisor  
District Court Litigation Division  
500 12th Street SW  
Washington, D.C. 20536  
Mobile: (202) 253- (b)(6)

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Under Plaintiffs’ proposed timeline, we would need ICE’s responses sent to OIL by the 29th to give us a few days to review and clarify with ICE, to then transmit to opposing counsel sometime during the following week of May 2, in time for a mediation session that week. It’s an ambitious timeline to say the least.

Best,

(b)(6)
Thank you for sending. Would the goal be to have ICE’s responses sent to OIL by April 29 or to Plaintiffs by April 29, so to OIL a few days before then?

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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Thank you,
Subject: RE: [EXTERNAL] Fraihat

Kind regards,

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From: (b)(6); (b)(7)(C)@usdoj.gov
Sent: Wednesday, April 13, 2022 2:33 PM
To: (b)(6); (b)(7)(C)@ice.dhs.gov
Cc: (b)(6); (b)(7)(C)@usdoj.gov; (b)(6); (b)(7)(C)@hq.dhs.gov; (b)(6); (b)(7)(C)@usdoj.gov; (b)(6); (b)(7)(C)@usdoj.gov; (b)(6); (b)(7)(C)@usdoj.gov; (b)(6); (b)(7)(C)@usdoj.gov; (b)(6); (b)(7)(C)@usdoj.gov; (b)(6); (b)(7)(C)@usdoj.gov

Subject: RE: [EXTERNAL] Fraihat

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Folks,

Please note that we still owe opposing counsel a response regarding the process for negotiating the claims in the complaint itself. I’ve made a verbal suggestion of what our response could look like to Annemarie, but we haven’t heard further from ICE.
Hi

(b)(5)
(b)(5)

Kind regards,

(b)(6):

(b)(6); (b)(7)(C)
Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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From: (b)(6); (b)(7)(C) @usdoj.gov>
Sent: Thursday, March 24, 2022 10:52 AM
To: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov;
   (b)(6); (b)(7)(C) @hq.dhs.gov
Cc: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov;
   (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6);
   (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C)
   @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ICE.DHS.GOV; Padilla, Kenneth [(b)(6); (b)(7)(C) @ice.dhs.gov]
   (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ICE.DHS.GOV; (b)(6); (b)(7)(C)
   @ICE.DHS.GOV; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov
   (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C)
   @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov;
   (b)(6); (b)(7)(C) @usdoj.gov; Loiacano, Adam V [(b)(6); (b)(7)(C) @ice.dhs.gov; Davis, Mike P
   (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;

Subject: RE: [EXTERNAL] Fraihat

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can click on report.

Thanks: (b)(6);

(b)(6); (b)(7)(C); (b)(5)

Thanks,

(b)(6)

(b)(6); (b)(7)(C)

Deputy Director
From:  
Sent: Thursday, March 24, 2022 10:30 AM  
To:  
Cc:  
Subject: RE: [EXTERNAL] Fraihat

Hi,

ICE accepts the suggested edits in blue from OIL. In addition, please see ICE’s responses to OIL’s questions in green below.

Kind regards,

Associate Legal Advisor  
U.S. Immigration and Customs Enforcement  
Office of the Principal Legal Advisor  
District Court Litigation Division  
500 12th Street SW  
Washington, D.C. 20536  
Mobile: (202) 253-
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From: (b)(6); (b)(7)(C) s@usdoj.gov
Sent: Monday, March 21, 2022 6:42 PM
To: (b)(6); (b)(7)(C) ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov;
(b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C)
Cc: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; Padilla, Kenneth (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; Padilla, Kenneth (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov;
(b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov;
(b)(6); (b)(7)(C) @usdoj.gov; Loliacono, Adam V (b)(6); (b)(7)(C) @ice.dhs.gov; Davis, Mike P
(b)(6); (b)(7)(C) @ice.dhs.gov
Subject: RE: [EXTERNAL] Fraihat

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Thanks you and all,

OIL's proposed additions are below in below, and question are in blue and highlighted. Nothing too major here – we’d like to turn this back to Plaintiffs by tomorrow. Please let us know if that will be possible.

(b)(6); (b)(7)(C)

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-
From: (b)(6); (b)(7)(C) @ice.dhs.gov>

Sent: Friday, March 18, 2022 5:56 PM

To: (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov;

Cc: (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov;

Subject: RE: [EXTERNAL] Fraihat

H (b)(6);

(b)(6); (b)(7)(C); (b)(5)
(b)(6); (b)(7)(C); (b)(5)
(b)(6); (b)(7)(C); (b)(5)
Kind regards,

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)
Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253-

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From: (b)(6); (b)(7)(C)@usdoj.gov
Sent: Monday, March 14, 2022 9:19 AM
To: (b)(6); (b)(7)(C)@usdoj.gov; (b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@hq.dhs.gov; (b)(6); (b)(7)(C)
Subject: RE: [EXTERNAL] Fraihat

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Good morning.

In addition to opposing counsel’s settlement related questions for tomorrow, they have also sent along a series of questions/concerns regarding PI compliance that I have attached here. Please let us know if there is anything in here that ICE would like to discuss initially, but we would otherwise request consolidated responses by COB Friday, or a heads up by COB Thursday if responses are taking longer to assemble and draft.

Thank you,

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-

From: (b)(6); (b)(7)(C)
Sent: Wednesday, March 09, 2022 2:42 PM
Subject: RE: [EXTERNAL] Faihat

Please find Plaintiffs’ follow-up questions attached. Please have consolidated and reviewed responses back to OIL by COB Tuesday 3/15, so that we can review and get back to Plaintiffs by COB on Wednesday 3/16.

Please also respond to let us know where DHS and ICE are on Plaintiffs’ request regarding an extension of their en banc deadline so that we can get back to them with something today, even if not a final decision.

Thank you.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-8

From: [Redacted]
Sent: Wednesday, March 09, 2022 7:37 AM
To: [Redacted]
Cc: [Redacted]
Good morning, ICE –

Thank you for the support preparing for and during Monday’s mediation session.

We scheduled the next mediation session for April 12, 2022, 11am ET, but Judge Winler was clear that he did not want to gather everyone again if the parties were not ready to make substantive progress by that date.

Lastly, a reminder that we need DHS and ICE positions on Plaintiffs’ extension request on the en banc rehearing deadline.

Thank you,
Yes, 60 days.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-3777

From: [b](6); [b](7)(C) @ice.dhs.gov
Sent: Wednesday, March 02, 2022 4:57 PM
To: [b](6); [b](7)(C) @usdoj.gov; [b](6); [b](7)(C) @ice.dhs.gov; [b](6); [b](7)(C) @hq.dhs.gov;
Cc: [b](6); [b](7)(C) @usdoj.gov; [b](6); [b](7)(C) @hq.dhs.gov;

[b](6); [b](7)(C) @ice.dhs.gov; [b](6); [b](7)(C) @hq.dhs.gov; [b](6); [b](7)(C) @usdoj.gov; [b](6); [b](7)(C) @hq.dhs.gov;

[b](6); [b](7)(C) @ice.dhs.gov; [b](6); [b](7)(C) @ice.dhs.gov; [b](6); [b](7)(C) @hq.dhs.gov;

[b](6); [b](7)(C) @ice.dhs.gov; [b](6); [b](7)(C) @hq.dhs.gov; [b](6); [b](7)(C) @usdoj.gov; [b](6); [b](7)(C) @hq.dhs.gov;

[b](6); [b](7)(C) @ice.dhs.gov; [b](6); [b](7)(C) @hq.dhs.gov; [b](6); [b](7)(C) @usdoj.gov; [b](6); [b](7)(C) @hq.dhs.gov;

[b](6); [b](7)(C) @ice.dhs.gov; [b](6); [b](7)(C) @hq.dhs.gov; [b](6); [b](7)(C) @usdoj.gov; [b](6); [b](7)(C) @hq.dhs.gov;

[b](6); [b](7)(C) @ice.dhs.gov; [b](6); [b](7)(C) @hq.dhs.gov; [b](6); [b](7)(C) @usdoj.gov; [b](6); [b](7)(C) @hq.dhs.gov;

Subject: RE: [EXTERNAL] Fraihat

Hi [b](6);

Thank you, I think that would be helpful.

[b](6); [b](7)(C)
Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536

2022-ICLI-00045 4920
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I can ask, but I’d imagine another 60 days.
Hi [b](6);

What is the timeframe Plaintiffs are requesting for another extension? I do not see the draft motion attached.

Kind regards,

[b](6);

[b](6); [b](7)(C)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (202) 253 [b](6);

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Please also see below, opposing counsel’s request for a further continuance of their deadline to seek en banc consideration of the Ninth Circuit’s decision. I’d like to be able to get back to them before the end of the week.

If there is concern about the pace of mediation, I would propose that we could agree to one more extension, but that we would need to see progress in mediation before agreeing to any further extensions?

Thanks,

I hope you are doing well. The current deadline for filing a petition for rehearing en banc is April 5, so we would like to get another consent motion for an extension on file next week to allow the mediation efforts to keep proceeding. It seems like Judge Wilner has been helpful and both sides feel that mediation has been productive so far. Please let us know if the attached motion is acceptable to ICE.

Thanks,
From: Deputy Director  
Office of Immigration Litigation  
District Court Section  
(202) 616

Sent: Wednesday, March 02, 2022 12:59 PM
To: @hq.dhs.gov; @ice.dhs.gov; @usdoj.gov; Padilla, Kenneth; Davis, Mike
Cc: @hq.dhs.gov; @ice.dhs.gov; @usdoj.gov; Loiacono, Adam V

Subject: RE: [EXTERNAL] Fraihat

Please find below Plaintiffs’ response. Please confer and let me know what ICE/DHS prefer. If past practice is any guide, I would recommend a response along these lines:

(b)(5)

Hi (b)(6) and please feel free to loop in your team)-

Thank you for the below information. We will not have time to prepare written responses ahead of our March 7 meeting with your team and Judge Wilner, but we do think a meeting is still worthwhile and will be prepared to discuss the information you've shared at that meeting, with a particular focus on: the detention proposal, the potential revised guidance regarding notice to class members, and consideration of subclass members held under 236c. We will likely primarily seek clarification and more information so that we can fully consider proposals or counter.
I will also under separate cover send you a proposal for moving forward with segregation and disability discussions after we wrap up with the PI, which will hopefully assuage your and your clients’ concern about addressing the whole case. These are the next two topics on our list of topics to cover and we think they can be handled in a similar format, which we will propose. I will get that to you shortly.

Many thanks

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-7707

From: (b)(6); (b)(7)(C)
Sent: Friday, February 25, 2022 12:35 PM
To: (b)(6); (b)(7)(C)
Cc: (b)(6); (b)(7)(C)
Subject: RE: [EXTERNAL] Fraihat

Thanks everyone.

Deputy Director
Office of Immigration Litigation
District Court Section
(202) 616-7707

From: (b)(6); (b)(7)(C)
Sent: Friday, February 25, 2022 11:48 AM
To: (b)(6); (b)(7)(C)
Cc: (b)(6); (b)(7)(C)
Subject: RE: [EXTERNAL] Fraihat

Thanks everyone.
Subject: RE: [EXTERNAL] Fraihat

(b)(6): please see a few edits in the attached.

Best,

(b)(6):

(b)(8); (b)(7)(C)

Assistant General Counsel for Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(202) 744-

(b)(6):

(b)(6); @hq.dhs.gov

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From: (b)(6); (b)(7)(C) @hq.dhs.gov
Sent: Thursday, February 24, 2022 9:50 PM
To: (b)(6); (b)(7)(C) @hq.dhs.gov;
Cc: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @usdoj.gov;
Adding a few OPLA folks.

(b)(6);
(b)(5)

Thanks,

Adam V. Loiacono
Deputy Principal Legal Advisor for Enforcement and Litigation
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
Phone: 202-500[b](6);
(b)(6); (b)(7)(C) @ice.dhs.gov

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From: (b)(6); (b)(7)(C) @usdoj.gov>
Sent: Monday, May 23, 2022 10:33 AM
To: (b)(6); (b)(7)(C) @hq.dhs.gov>
Cc: Loiacono, Adam V. [ (b)(6); (b)(7)(C) @ice.dhs.gov] ; (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) @hq.dhs.gov>
(b)(6); (b)(7)(C) @hq.dhs.gov>
(b)(6); (b)(7)(C) @hq.dhs.gov>
(b)(6); (b)(7)(C) @hq.dhs.gov>
(b)(6); (b)(7)(C) @hq.dhs.gov>
Subject: RE: [EXTERNAL] Fraihat

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Thanks. As currently marked re privilege I would appear to be prohibited from sharing this with opposing counsel in this form or other substance. Can you please confirm what I may share with them, and tweak the headers as needed if I’m cleared to send this counter?

Also, (b)(5)

(b)(5)

(b)(6); (b)(7)(C)
Deputy Director
Office of Immigration Litigation
District Court Section

2022-ICLI-00045 4927
From: (b)(6); (b)(7)(C) @hq.dhs.gov
Sent: Monday, May 23, 2022 10:20 AM
To: (b)(6); (b)(7)(C) @hq.dhs.gov
Cc: Loiacono, Adam V [b](6); (b)(7)(C) @ice.dhs.gov; [b](6); (b)(7)(C) 
@hq.dhs.gov
Subject: [EXTERNAL] Friihat

(b)(6); I am attaching our revised offer. (b)(5)

We’re happy to set up a call to discuss.

Best,

(b)(6);

Assistant General Counsel for Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(202) 740[6] (b)(6);

(b)(6); @hq.dhs.gov

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NOTICE OF CUSTODY DETERMINATION
(Continuation)

Pursuant to a review conducted to comply with requirements in Fraihat v. ICE, --- F. Supp. 3d ---, 2020 WL 1932570 (C.D. Cal. Apr. 20, 2020), you have been identified as having one or more of the Risk Factors identified by the district court as placing you "at heightened risk of severe illness and death upon contracting the COVID-19 virus."

The Risk Factor(s) in your case are that you:

☐ Are age 55 or over
☐ Are Pregnant
☐ Have a Chronic Care Condition (As confirmed by a medical professional)

Condition:  Obesity

Upon review of the totality of the circumstances present in your case, it has been determined that you will:

☐ Be released from custody, subject to conditions referenced on Form I-286
☑ Remain detained, and the following facts form the basis for your continued detention:

Other: Additional information provided below

Comments: ERO management reviewed [b](6); custody pursuant to the FRAHAT v. ICE injunction, considering [b](6); medical condition of overweight. ICE Health Service Corps (IHSC) advised that [b](6) has no chronic medical conditions or psychological issues. ERO management decided to continue [b](6); detention based on IHSC's assessment that he is stable, and [REDACTED]
NOTICE OF CUSTODY DETERMINATION
(Continuation)

Pursuant to a review conducted to comply with requirements in Frailhat v. ICE, --- F. Supp. 3d ---, 2020 WL 1932570 (C.D. Cal. Apr. 20, 2020), you have been identified as having one or more of the Risk Factors identified by the district court as placing you "at heightened risk of severe illness and death upon contracting the COVID-19 virus."

The Risk Factor(s) in your case are that you:

- [ ] Are age 55 or over
- [ ] Are Pregnant
- [✓] Have a Chronic Care Condition (As confirmed by a medical professional)
  Condition: BMI

Upon review of the totality of the circumstances present in your case, it has been determined that you will:

- [ ] Be released from custody.
- [✓] Remain detained, and the following justification forms the basis for your continued detention: Select ONE
  Threat to Public Safety

Comments:

Signature

Title SDDO

Form I-831 Continuation Page (Rev. 02/08/2021) 2022-ICLI-00045 4930

2 of 2 Pages
DEPARTMENT OF HOMELAND SECURITY
NOTICE OF CUSTODY DETERMINATION

Alien's Name: (b)(6); (b)(7)(C)  
A-File Number: (b)(6); (b)(7)(C)  
Date: 03/17/2022  
Event ID: (b)(7)(E)  
Subject ID: (b)(6); (b)(7)(C)

Pursuant to the authority contained in section 236 of the Immigration and Nationality Act and part 236 of title 8, Code of Federal Regulations, I have determined that, pending a final administrative determination in your case, you will be:

☐ Detained by the Department of Homeland Security.

☐ Released (check all that apply):
   ☐ Under bond in the amount of $ __________
   ☐ On your own recognizance.
   ☐ Under other conditions. [Additional document(s) will be provided.]

(b)(6); (b)(7)(C)

Name and Signature of Authorized Officer  
SDDO  
Title  
Date and Time of Custody Determination:
03/17/2022 10:42
ERQ KROME Detention Facility  
18201 SW 12TH ST  
MIAMI FL 33194  
Office Location/Address

You may request a review of this custody determination by an immigration judge.

☐ I acknowledge receipt of this notification, and
   ☐ I do request an immigration judge review of this custody determination.
   ☐ I do not request an immigration judge review of this custody determination.

(b)(6); (b)(7)(C)

Signature of Alien  
Date: 03/17/2022

The contents of this notice were read to (b)(6); (b)(7)(C) in the ENGLISH language.  
(Name of Alien)  
(Name of Language)

Deportation Officer  
Title

2022-ICLI-00045 4931
NOTICE OF CUSTODY DETERMINATION
(Continuation)

Pursuant to a review conducted to comply with requirements in Fraihat v. ICE, --- F. Supp. 3d ---, 2020 WL 1932570 (C.D. Cal. Apr. 20, 2020), you have been identified as having one or more of the Risk Factors identified by the district court as placing you “at heightened risk of severe illness and death upon contracting the COVID-19 virus.”

The Risk Factor(s) in your case are that you:

☐ Are age 55 or over
☐ Are Pregnant
☑ Have a Chronic Care Condition (As confirmed by a medical professional)
  Condition: overweight, GERD, schizo-affective, PTSD, mild asthma

Upon review of the totality of the circumstances present in your case, it has been determined that you will:

☐ Be released from custody.
☑ Remain detained, and the following justification forms the basis for your continued detention: Select ONE

Threat to Public Safety

Comments: ☑ There is a 50-year old citizen of Jamaica, who has been diagnosed by medical staff as being overweight, and suffering from GERD, Schizo-affective disorder, PTSD, mild asthma, conditions that place him within the populations identified by the CDC as potentially being at higher risk for serious illness from COVID-19 and/or the subclasses certified in Fraihat v. ICE, --- F. Supp. 3d ---, 2020 WL 1932570 (C.D. Cal. Apr. 20, 2020).

☒ There is a 50-year old resident of this country, who has a criminal record reflecting a conviction for weapon offense - improper exhibition of dangerous weapon/firearm in [h] and [h] also has pending charges for aggravated assault with a weapon, battery/assault or strike/cause bodily harm and fraud-unlawful use false name/identity.

☒ There is a 50-year old resident of this country, who was ordered removed by an immigration judge on 7/28/2021. The case appeal to the Board of Immigration Appeal was dismissed on 1/13/2022. Mr. [b] was ordered removed by an immigration judge on 7/28/2021. The case appeal to the Board of Immigration Appeal was dismissed on 1/13/2022. [b] filed a Petition for Review with the U.S. Court of Appeals for the 11th Circuit Court on 2/26/2022. The U.S. Court of Appeals for the 11th Circuit granted the Motion to Stay Removal pending the adjudication of the Petition for Review on 2/23/2022.

The facts of the case indicate that [h] may pose a threat to public safety based on his criminal history and propensity to violence, and as such a decision has been made to continue his detention pending the outcome of removal efforts.

Signature [b]; Title Acting OIC

2 of 2 Pages
NOTICE OF CUSTODY DETERMINATION

(Continuation)

Pursuant to a review conducted to comply with requirements in Fraihat v. ICE, --- F. Supp. 3d ---, 2020 WL 1932570 (C.D. Cal. Apr. 20, 2020), you have been identified as having one or more of the Risk Factors identified by the district court as placing you "at heightened risk of severe illness and death upon contracting the COVID-19 virus."

The Risk Factor(s) in your case are that you:

☐ Are age 55 or over

☐ Are Pregnant

☑ Have a Chronic Care Condition (As confirmed by a medical professional)

Condition:  Overweight

Upon review of the totality of the circumstances present in your case, it has been determined that you will:

☐ Be released from custody. If released, do not make a selection from the drop down or input a comment.

☑ Remain detained, and the following justification forms the basis for your continued detention: Select ONE

Threat to Public Safety

Comments: Based on a careful and thorough review of your case, a decision has been made to continue your detention not withstanding your medical condition, since you remain a potential threat to public safety.

Signature

[Redacted]

[Redacted]

Title  SDDO

SUBMIT AND PRINT  SAVE AS PDF  RESET
NOTICE OF CUSTODY DETERMINATION
(Continuation)

Pursuant to a review conducted to comply with requirements in Fraihat v. ICE, --- F. Supp. 3d ---, 2020 WL 1932570 (C.D. Cal. Apr. 20, 2020), you have been identified as having one or more of the Risk Factors identified by the district court as placing you "at heightened risk of severe illness and death upon contracting the COVID-19 virus."

The Risk Factor(s) in your case are that you:

- [x] Are age 55 or over
- [ ] Are Pregnant
- [x] Have a Chronic Care Condition (As confirmed by a medical professional)
  
  Condition: Obesity

Upon review of the totality of the circumstances present in your case, it has been determined that you will:

- [ ] Be released from custody.
- [x] Remain detained, and the following justification forms the basis for your continued detention: Select ONE

Threat to Public Safety

Comments: [b](6); [b](7)(C); [b](7)(E)

Signature [b](6); [b](7)(C)

Title SDDO
NOTICE OF CUSTODY DETERMINATION
(Continuation)

Pursuant to a review conducted to comply with requirements in Fraihat v. ICE, --- F. Supp. 3d ---, 2020 WL 1932570 (C.D. Cal. Apr. 20, 2020), you have been identified as having one or more of the Risk Factors identified by the district court as placing you "at heightened risk of severe illness and death upon contracting the COVID-19 virus."

The Risk Factor(s) in your case are that you:

☐ Are age 55 or over

☐ Are Pregnant

☑ Have a Chronic Care Condition (As confirmed by a medical professional)

Condition: Mental Health

Upon review of the totality of the circumstances present in your case, it has been determined that you will:

☐ Be released from custody. If released, do not make a selection from the drop down or input a comment.

☑ Remain detained, and the following justification forms the basis for your continued detention: Select ONE Threat to Public Safety

Comments:

Signature

(b)(6); (b)(7)(C)

Title

SDDO
DEPARTMENT OF HOMELAND SECURITY
NOTICE OF CUSTODY DETERMINATION

Alien's Name: [b](6);[b](7)(C)  A-File Number: [b](6);[b](7)(C)
Date: 05/07/2022

Event ID: [b](7)(E)  Subject ID: [b](6);

Pursuant to the authority contained in section 236 of the Immigration and Nationality Act and part 236 of title 8, Code of Federal Regulations, I have determined that, pending a final administrative determination in your case, you will be:

☑ Detained by the Department of Homeland Security.

☐ Released (check all that apply):
   ☐ Under bond in the amount of $ _________
   ☐ On your own recognizance.
   ☐ Under other conditions. [Additional document(s) will be provided.]

S. [Redacted]
Name and Signature of Immigration Officer

05/07/2022 08:29
Date and Time of Custody Determination
Bro O'Keeffe Sub Office
E Whatley Rd
Oakdale LA 71463
Office Location/Address

Assistant Field Office Director
Title

You may request a review of this custody determination by an immigration judge.

☐ I acknowledge receipt of this notification, and
   ☐ I do request an immigration judge review of this custody determination.
   ☐ I do not request an immigration judge review of this custody determination.

____________________________  _________________________
Signature of Alien  Date

The contents of this notice were read to [b](6);[b](7)(C) in the SPANISH language.

[Redacted]
(Name of Alien)

____________________________
Name and Signature of Officer

____________________________
Deportation Officer
Title

____________________________
Name or Number of Interpreter (if applicable)
NOTICE OF CUSTODY DETERMINATION  
(Continuation)

Pursuant to a review conducted to comply with requirements in Fraihat v. ICE, --- F. Supp. 3d ---, 2020 WL 1932570 (C.D. Cal. Apr. 20, 2020), you have been identified as having one or more of the Risk Factors identified by the district court as placing you “at heightened risk of severe illness and death upon contracting the COVID-19 virus.”

The Risk Factor(s) in your case are that you:

☐ Are age 55 or over

☐ Are Pregnant

☑ Have a Chronic Care Condition (As confirmed by a medical professional)
   Condition: E66.3 - Overweight

Upon review of the totality of the circumstances present in your case, it has been determined that you will:

☐ Be released from custody.

☑ Remain detained, and the following justification forms the basis for your continued detention: Select ONE

   Threat to Public Safety

Comments:

Signature (b)(6); (b)(7)(C)

Title AFOD

Form I-831 Continuation Page (Rev. 02/08/2021)
DEPARTMENT OF HOMELAND SECURITY
NOTICE OF CUSTODY DETERMINATION

Alien’s Name: (b)(6);(b)(7)(C) A-File Number: (b)(6); (b)(7)(C)

Date: 05/07/2022

Event ID: (b)(7)(E) Subject ID: (b)(6);

Pursuant to the authority contained in section 236 of the Immigration and Nationality Act and part 236 of title 8, Code of Federal Regulations, I have determined that, pending a final administrative determination in your case, you will be:

☒ Detained by the Department of Homeland Security.

☐ Released (check all that apply):
  ☐ Under bond in the amount of $ __________
  ☐ On your own recognizance.
  ☒ Under other conditions. [Additional document(s) will be provided.]

(b)(6); (b)(7)(C)

Name and Signature of Authorized Officer

Assistant Field Office Director

05/07/2022 08:51
Date and Time of Custody Determination
ERO OAKDALE Sub Office
E WHATLEY RD
OAKDALE LA 71463
Office Location/Address

You may request a review of this custody determination by an immigration judge.

☐ I acknowledge receipt of this notification, and
  ☐ I do request an immigration judge review of this custody determination.
  ☒ I do not request an immigration judge review of this custody determination.

_________________________ ________________________
Signature of Alien Date

The contents of this notice were read to (b)(6); (b)(7)(C) in the SPANISH language.

(Name of Alien) (Name of Language)

Name and Signature of Officer

Deportation Officer

Name or Number of Interpreter (if applicable)

DHS Form I-288 (1/14) 2022-ICLI-00045 4938
NOTICE OF CUSTODY DETERMINATION

Pursuant to a review conducted to comply with requirements in Fraihat v. ICE, --- F. Supp. 3d ---, 2020 WL 1932570 (C.D. Cal. Apr. 20, 2020), you have been identified as having one or more of the Risk Factors identified by the district court as placing you "at heightened risk of severe illness and death upon contracting the COVID-19 virus."

The Risk Factor(s) in your case are that you:

☐ Are age 55 or over

☐ Are Pregnant

☑ Have a Chronic Care Condition (As confirmed by a medical professional)

Condition:  Overweight; Essential primary hypertension

Upon review of the totality of the circumstances present in your case, it has been determined that you will:

☐ Be released from custody.

☑ Remain detained, and the following justification forms the basis for your continued detention: Select ONE

Threat to Public Safety

Comments:

Signature  [b](6); (b)(7)(C)  Title  AFOD

---

Form I-333 Continuation Page (Rev. 02/08/2021)  2022-ICLI-00045  4939

2 of 2 Pages
Subject: RE: [EXTERNAL] Fraihat

Thank you.

Deputy Director
Office of Immigration Litigation
District Court Section

From: [b(6); (b)(7)(C)]
Sent: Thursday, April 07, 2022 10:05 AM
To: [b(6); (b)(7)(C)]
Cc: [b(6); (b)(7)(C)]

Subject: RE: [EXTERNAL] Fraihat

Hi [b(6)]

Please find below further information from ERO concerning the detainee [b(6); (b)(7)(C)]

Apologies for the delay.
Please let us know if you have any additional questions. Thank you.

Sincerely,

[b](6); (b)(7)(C]
Associate Legal Advisor
Department of Homeland Security
Immigration and Customs Enforcement
Office of the Principal Legal Advisor—District Court Litigation Division
500 12th Street SW [b](6); (b)(7)(C]
Washington, D.C. 20536
Mobile Phone: [b](6); (b)(7)(C]

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From: [b](6); (b)(7)(C]
Sent: Tuesday, April 5, 2022 6:38 PM
To: [b](6); (b)(7)(C]
Cc: [b](6); (b)(7)(C]
[b](6); (b)(7)(C]
[b](6); (b)(7)(C]
[b](6); (b)(7)(C]
[b](6); (b)(7)(C]
[b](6); (b)(7)(C]
[b](6); (b)(7)(C]
[b](6); (b)(7)(C]
[b](6); (b)(7)(C]
Hi Fraihat,

Thank you very much.

Sincerely,

Associate Legal Advisor
Department of Homeland Security
Immigration and Customs Enforcement
Office of the Principal Legal Advisor—District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile Phone:

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Subject: Re: [EXTERNAL] Fraihat

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Thanks. Any details about what happened here?

Sent from my iPhone

On Mar 31, 2022, at 5:25 PM, [b](6); [b](7)(C) wrote:

Hi OIL,

Per ERO, this individual is being released from ICE custody today. Attached is the I-831.

Thank you.

[b](6); [b](7)(C)
Associate Legal Advisor
Department of Homeland Security
Immigration and Customs Enforcement
Office of the Principal Legal Advisor—District Court Litigation Division
500 12th Street SW [b](6); [b](7)(C)
Washington, D.C. 20536
Mobile Phone: [b](6); [b](7)(C)

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From: (b)(6); (b)(7)(C) @usdoj.gov
Sent: Tuesday, March 29, 2022 3:35 PM
To: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov;
   (b)(6); (b)(7)(C) @hq.dhs.gov;
Cc: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov;
   (b)(6); (b)(7)(C) @usdoj.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
   Padilla, Kenneth @ice.dhs.gov;
Subject: RE: [EXTERNAL] Fraihat

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Please find attached one additional allegation of Fraihat noncompliance, for which Plaintiffs request a response by March 31. The detainee reference in this email is listed at Row 33900 of the latest bi-weekly production, and reflects a custody determination having occurred in August 2021.

(b)(5)

- Defendants shall provide notice of the result of the custody determination to the Subclass member and his or her counsel. The notice shall mention the Risk Factor(s) identified, and in cases of non-release shall reference a basis for continued detention in the Docket Review Guidance.

Please let know if there are any questions or clarification needed before sending a response over for OIL’s review.
Thank you. I’ve incorporated as best I can and send the attached final correspondence to opposing counsel.

Deputy Director
Office of Immigration Litigation
District Court Section

From: (b)(6); (b)(7)(C)
Sent: Friday, March 25, 2022 7:46 PM
To: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov;
(b)(8); (b)(7)(C) @hq.dhs.gov
Cc: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @hq.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
(b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;

Subject: RE: [EXTERNAL] Fraihat
Subject: RE: [EXTERNAL] Fraihat

Hi [b](6)

Please see ICE’s responses in red:
Medical History Review

Kind regards,

[Redacted]

[Redacted]

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division

500 12th Street SW
Washington, D.C. 20536
Mobile: [Redacted]

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From: (b)(6); (b)(7)(C) @usdoj.gov
Sent: Friday, March 25, 2022 4:56 PM
To: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov;
   (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C)
Cc: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov;
   (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov; Padilla, Kenneth (b)(6); (b)(7)(C)
   @ice.dhs.gov;
   (b)(6); (b)(7)(C) @HQ.DHS.GOV; (b)(6); (b)(7)(C)
   @ice.dhs.gov; (b)(6); (b)(7)(C)
   @ice.dhs.gov; (b)(6); (b)(7)(C)
   @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C)
   @ice.dhs.gov; (b)(6);
   (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov;
   (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C)
   @ice.dhs.gov; Davis, Mike P
   (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C)
   @ice.dhs.gov; (b)(6); (b)(7)(C)
   @ice.dhs.gov; (b)(6); (b)(7)(C)
   @ice.dhs.gov; (b)(6); (b)(7)(C)
   @ice.dhs.gov; (b)(6); (b)(7)(C)
   @ice.dhs.gov; (b)(6); (b)(7)(C)
   @ice.dhs.gov; (b)(6); (b)(7)(C)
   @ice.dhs.gov; (b)(6); (b)(7)(C)
   @ice.dhs.gov; (b)(6); (b)(7)(C)
   @ice.dhs.gov; (b)(6); (b)(7)(C)
   @ice.dhs.gov; (b)(6); (b)(7)(C)
   @ice.dhs.gov; (b)(6); (b)(7)(C)
   @ice.dhs.gov;

Subject: RE: [EXTERNAL] Fraihat

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Following up on this please.

Deputy Director
Office of Immigration Litigation
District Court Section

From: (b)(6); (b)(7)(C)
Sent: Thursday, March 24, 2022 2:28 PM
To: (b)(6); (b)(7)(C) @ice.dhs.gov; (b)(6); (b)(7)(C) @usdoj.gov;
   (b)(6); (b)(7)(C) @hq.dhs.gov; (b)(6); (b)(7)(C)
   @hq.dhs.gov; (b)(6); (b)(7)(C)

2022-ICLI-00045 4949
Thanks.

Deputy Director
Office of Immigration Litigation
District Court Section

From: [b(6); (b)(7)(C)]
Sent: Thursday, March 24, 2022 2:19 PM
To: [b(6); (b)(7)(C)]
Cc: [b(6); (b)(7)(C)]

Subject: RE: [EXTERNAL] Fraihat

2022-ICLI-00045 4950
In addition, these inquiries required a significant amount of back and forth with various offices in the field, which resulted in delays. However, please our additional responses below in red.
Medical History Review

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile

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Thanks.

Several responses here unfortunately require further follow-up, and I’m concerned about the time that is taking to turn things around here.
Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section

From: [REDACTED]@hq.dhs.gov
Sent: Thursday, March 24, 2022 10:30 AM
To: [REDACTED]@hq.dhs.gov; [REDACTED]@hq.dhs.gov; [REDACTED]@hq.dhs.gov; [REDACTED]@hq.dhs.gov;
Cc: [REDACTED]@ice.dhs.gov; [REDACTED]@ice.dhs.gov; [REDACTED]@ice.dhs.gov; [REDACTED]@ice.dhs.gov; [REDACTED]@ice.dhs.gov; [REDACTED]@ice.dhs.gov; [REDACTED]@ice.dhs.gov;
Subject: RE: [EXTERNAL] Fraihat

Hi [REDACTED]

ICE accepts the suggested edits in blue from OIL. In addition, please see ICE’s responses to OIL’s questions in green below.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Thanks you [(b)(6)] and all,

OII’s proposed additions are below in below, and question are in blue and highlighted. Nothing too major here – we’d like to turn this back to Plaintiffs by tomorrow. Please let us know if that will be possible.

[(b)(6)]
[(b)(7)C]
Hi [b](b)(6);

Please see below for ICE’s responses in red. Please note that two requests below need additional time for ICE to finalize a response.

ICE has his name as Buffalo (Batavia) Service Processing Center: Judge Bernal held that “only in rare cases should a Subclass member not subject to mandatory detention remain detained,” ECF 240 at 17, and that subclass members “should generally be released absent a specific finding they would pose a danger to property or persons,” ECF 281 at 5. ICE’s response to our summary of [b](b)(6); [b](7) risk factors fails to provide such a specific justification for why [b](6); — who is held under non-mandatory detention authority— has been denied release despite the presence of multiple serious risk factors. We also note that the most recently biweekly production only lists his BMI as a qualifying risk factor, ignoring his several other serious conditions. Consequently, we request that ICE reconsider [b](8); denial of release, or at a minimum provide an individualized explanation—beyond a mere cursory recitation of an alleged criminal record—for why [b](6); is a current public safety threat and why that threat outweighs the serious risks to [b](6); health.

[b](5); [b](6); [b](7)
Krome North Service Processing Center; is also held under non-mandatory detention authority and has multiple health conditions (including Hepatitis B), which place at high risk for severe illness from COVID-19. Judge Bernal ordered ICE to “accord[] significant weight to the presence of a Risk Factor and to public health” in evaluating or re-evaluating whether continued detention is appropriate, “to ensure medically vulnerable and elderly detainees are quickly identified and released . . . to protect them from severe illness and death from COVID-19.” ECF 240 at 14. ICE’s response to our summary of circumstances does not engage with any of his risk factors and merely recites an alleged criminal record. The most recent biweekly production also only lists “overweight” as a qualifying risk factor. As we requested for we request that ICE reconsider denial of release, or at a minimum provide an individualized explanation—beyond a mere cursory recitation of an alleged criminal record—for why is a current public safety threat. We also seek confirmation that ICE has communicated to relevant Krome staff that a subclass member need not be on the verge of death to be granted release under Frailhat.
Laredo Detention Center: Friahat risk factors include psychiatric conditions “that make it difficult for the individual to participate in their own care, that make it unlikely the individual will express symptoms, or that increase the risk of complications from the virus, such as depression and PTSD.” ECF 240 at 18. In our summary, we described that she has high blood pressure, depression, and PTSD, but ICE’s response ignored her mental health conditions, despite her receipt of mental health treatment in detention. We request that ICE reconsider[b](6); [b](7)(C) denial of release, taking into account her mental health risk factors. ICE also failed to respond to our request that [b](6); [b](7)(C) be provided with a vaccine. Please confirm that she has been vaccinated.

Question for ICE – was [b](6); [b](7)(C) eligible for and offered a vaccine prior to her release? If not offered, is there any explanation why she was not offered a vaccine? [b](5)

Seneca County Jail:

- **Vaccines:** The PRR mandates that vaccines be “offered as close to intake as possible but always within 14 days of arrival, PRR at 25, and reiterates the 14-day requirement for Friahat subclass members, PRR at 15. The PRR further describes how “Sites may request that ICE ship the COVID-19 vaccine directly to the facility by sending an e-mail request to: [b](7)(E)@ice.dhs.gov.” PRR at 25. Despite this 14-day requirement, ICE’s response indicates that Seneca County Jail only provides a monthly vaccine clinic, and even then, only if there is adequate supply to do so. Please explain why the facility did not request that vaccines be delivered via the process described in the PRR, given the limited availability from the Seneca County Health Department. Please also confirm that the Seneca County Health Department did indeed host a booster clinic on 2/15/2022 as described in ICE’s response.

- **Cleaning Supplies and PPE:** In its response, ICE describes how cleaning supplies and PPE (such as masks and gloves) are available to detained persons 24/7, but also explains that cleaning supplies are not kept in the units and that they must be requested from staff. Please clarify how soon such supplies are provided after a request.

  Does ICE now have a response to this inquire. If not, when is it expected? [b](5)

  [b](5)
Additional Instances of Noncompliance

[ ] La Palma Correctional Center

- [b](6); (b)(7)(C) has been detained at La Palma since December 2020. His medical record from detention indicates that he receives treatment for several psychiatric risk factors, including depression and anxiety. His attorney submitted a Fraihat request describing these risk factors on 1/25/2022. The following day, she received a call from the SDDO admitting that he was Fraihat subclass member but saying that they would not consider him for release without providing an explanation for why that was so. After the attorney followed up over email, the SDDO provided the following cursory response (still lacking basis for denial): “ICE has received your request for release of your client pursuant to Fraihaht [sic]. ICE has reviewed the case and at this time is declining to release your client, thank you.” [b](6); attorney subsequently submitted a renewed request for review, and—after multiple follow-ups and congressional assistance—received a response by email on 2/17/2022 from the Phoenix AFOD denying his membership in the Fraihat subclass at all. The email chain also included an analysis by facility medical personnel describing how “He is currently being treated for his depression, anxiety and knee pain” but denying that his mental health conditions put him at higher risk of severe illness from COVID-19. Recent biweekly records indicate that he is not held under mandatory authority, and that ICE is aware of his status as a subclass member based on BMI, however they omit his psychiatric risk factors. He recently tested positive for COVID-19 and is currently in isolation. He has also been on a hunger strike since January 22, 2022 and has been hospitalized several times in the last month.

- Request: Plaintiffs request that ICE reconsider [b](6); denial of Fraihat release, giving primary consideration to his multiple risk factors. See ECF 240 at 14. Plaintiffs also request that ICE communicate to staff at La Palma that relevant risk factors include psychiatric conditions, ECF 240 at 18, and that the presence of any risk factor is a “significant discretionary factor in favor of release,” ECF 240 at 8. We also request that ICE remind relevant staff at La Palma and the Phoenix Field Office that cursory, non-individualized denials are noncompliant with Judge Bernal’s orders, and that subclass members “should generally be released absent a specific finding they would pose a danger to property or persons,” ECF 281 at 5.

[b](5); (b)(7)(E)

(b)(5); (b)(7)(E) Does ICE now have a response to this inquir. If not, when is it expected? Has ICE determined him to be a classmember or not?

(b)(5)

[b](6); (b)(7)(C) Orange County Jail:

- [b](6); has several risk factors, including chronic kidney infection, depression, anxiety and post-traumatic stress disorder. Despite her multiple risk factors, the most recent biweekly production does not list has as a subclass member. Due to her heightened risk of severe illness and death [b](6); requested a booster vaccine in January 2022 but before she received her booster dose, [b](6); cell mate tested
positive for COVID-19. Because the facility does not have a dedicated quarantine unit, [b](6); remained housed in the cell with her COVID-positive cell mate, so she also contracted COVID-19 soon thereafter. [b](6); and her cell mate were subsequently isolated in their cell as a quarantine measure, deprived of any out-of-cell time except for daily showers. Judge Bernal’s orders clarify that “medical isolation and quarantine are distinct from solitary, segregated, or punitive housing, that extended lockdowns as a means of COVID-19 prevention are not allowed, and that access to diversion (books, television, recreation) and to telephones must be maintained to the fullest extent possible.” ECF 240 at 10. Yet, During her isolation, there was at least one occasion in which staff forgot to take [b](6); out for her shower, leaving her locked in her cell for more than 24 hours straight [b](6); isolation was functionally a lockdown.

- Request: Plaintiffs request that ICE conduct a custody review of [b](6); taking into account all of her multiple risk factors. If ICE determines that [b](6); does not qualify as a subclass member, we request an individualized explanation for why this is so. We also request that ICE remind relevant staff at Orange County Jail that quarantine cannot amount to solitary confinement or lockdown.

This statement conflicts with that made in the attached email and reflected by the executed and filed declaration – which together than [b](5); received two Fraihat custody determinations in 2021 based on her BMI (although she is not listed on the bi-weekly reporting. The timeline below also references custody reviews occurring pursuant to Fraihat, which would not have been necessary if she was not a class member.

[b](5); [b](6); [b](7)(C)
Krome ICE Processing Center:

- [b](5); [b](6); [b](7)(C) has chronic asthma. In November 2021, [b](6); [b](6) was exposed to a carbon monoxide leak while detained at Glades County Detention Center. He was airlifted to a hospital due the severity of his exposure and continues to experience lasting effects, including vomiting and coughing blood, chest tightness and pain, and blood in his stool. Despite his condition, the most recent biweekly spreadsheet only lists his risk factor as “overweight.” [b](6); [b](6) was transferred from Glades to Krome, where he requested Fraihat release. On December 22, 2021, ICE staff verbally notified [b](6); [b](6) that he would be released within 48 hours due to his medical conditions. However, he remains detained to this day, more than 2 months after he was told he would be released. [b](6); [b](6) reports that ICE alleges that his continued detention is because he never signed his Fraihat release notice, but [b](6); [b](6) never received such a notice since ICE staff communicated his release decision verbally.

- Request: Plaintiffs request that ICE review [b](6); [b](6) for release due to his multiple risk factors and emergent medical need.

Any updates on removal? [b](5); [b](6); [b](7)(C)
Fraihat

- Has anemia, a heart condition (which caused him to have a blood transfusion in November), lasting respiratory complications from COVID-19, and he had a colon surgery on 2/28/22. The most recent biweekly records indicate that his last custody review was conducted in August 2021, and lists his weight as his only risk factor, failing to mention any of his other conditions. As his health has worsened over time, has requested a renewed Fraihat custody redetermination. However, ICE officials told him that they would not conduct another review for him since they had already made a decision. He also has not received an explanation for his denial, in violation of Judge Bernal’s order stating that “[o]nly in rare cases should a Subclass member not subject to mandatory detention remain detained, and pursuant to the Docket Review Guidance, a justification is required.” See ECF 240 at 17.

- **Request:** Plaintiffs request that ICE reconsider denial of Fraihat release, giving primary consideration to his multiple risk factors. See ECF 240 at 14. Plaintiffs also request that ICE communicate to staff of Pike County Jail that they are required to conduct renewed Fraihat reviews in light of updates in subclass members’ medical
conditions, ECF 240 at 17, and that the presence of any risk factor is a “significant
discretionary factor in favor of release,” ECF 240 at 8.

(b)(5); (b)(6); (b)(7)(C)

in ICE’s biweekly records) (b)(6); Otero County Processing Center

has hypertension and has a BMI of over 27, both of which are reflected in
his medical records from detention. The most recent biweekly records indicate that he is
not held under mandatory detention, but only mark his BMI as a qualifying risk factor. In
November 2021, (b)(6); (b)(7)(C) was denied Fraihat release, with the only justification
provided that he was a "Threat to Public Safety." His counsel sought more information, but
has not been given any. He was recently however able for a renewed custody review, but
once again received a cursory denial on March 4, 2022, with the only justification provided
as "Threat to Public Safety," omitting any individual details. Judge Bernal’s orders make
clear that “cursory denials do not comply with the Preliminary Injunction or with the
Docket Review Guidance’s instruction to make individualized determinations.” ECF 240 at
17. Judge Bernal’s orders further hold that “[o]nly in rare cases should a Subclass member
not subject to mandatory detention remain detained, and pursuant to the Docket Review
Guidance, a justification is required.” Id.

Request: Plaintiffs request that ICE reconsider (b)(6); (b)(7)(C) denial of release, or at a
minimum provide an individualized explanation for why—despite his nonmandatory
status—he is a current public safety threat and why that threat outweighs the serious risks
to his health.

(b)(5); (b)(6); (b)(7)(C)

Torrance County Detention Facility

has diagnoses of Chronic Post Traumatic Stress Disorder, Severe Generalized
Anxiety Disorder, and Severe Major Depressive Disorder, and on occasion has required 24-
hour medical watch during his time in detention. He also has a history of smoking. (b)(6);
(b)(6); is held under non-mandatory authority and he submitted a Fraihat request by
counsel in September 2021, to which he received a response on October 8, 2021 that he
“does not have a Fraihat vulnerability.” Despite this communication, ICE’s most recent
biweekly productions include him as a class member based on risk factors of “[a]djustment
disorder with mixed anxiety and depressed mood.” As far as we are aware, ICE’s
determination that he is a subclass member has never been communicated to either (b)(6)
(b)(6); or his counsel. Judge Bernal’s orders require that Defendants “provide notice of the
result of the custody determination to the Subclass member and his or her counsel,” and
the “notice shall mention the Risk Factor(s) identified, and in cases of nonrelease shall
reference a basis for continued detention in the Docket Review Guidance.” ECF 240 at 17.
ICE’s only response not only did not notify or his counsel regarding his membership in a Fraihat subclass despite ICE’s own records indicating that he qualifies, but did not provide an individualized basis for continued detention.

- **Request:** Plaintiffs request that ICE reconsider denial of release. Should ICE once again deny his request, we request that and his counsel be provided notice that includes an individualized explanation for his denial.

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Good morning.

In addition to opposing counsel’s settlement related questions for tomorrow, they have also sent along a series of questions/concerns regarding PI compliance that I have attached here. Please let us know if there is anything in here that ICE would like to discuss initially, but we would otherwise request consolidated responses by COB Friday, or a heads up by COB Thursday if responses are taking longer to assemble and draft.

Thank you,

Deputy Director
Office of Immigration Litigation
District Court Section

From: (b)(6); (b)(7)C
Sent: Wednesday, March 09, 2022 2:42 PM
To: (b)(6); (b)(7)C
Cc: (b)(6); (b)(7)C

Subject: RE: [EXTERNAL] Fraihat

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Please find Plaintiffs’ follow-up questions attached. Please have consolidated and reviewed responses back to OIL by COB Tuesday 3/15, so that we can review and get back to Plaintiffs by COB on Wednesday 3/16.

Please also respond to let us know where DHS and ICE are on Plaintiffs’ request regarding an extension of their en banc deadline so that we can get back to them with something today, even if not a final decision.

Thank you.

Deputy Director
Office of Immigration Litigation
District Court Section

From: Padilla, Kenneth
To: Lolacono, Adam V; Davis, Mike P
Cc: Padilla, Kenneth
Subject: RE: [EXTERNAL] Fraihat

Sent: Wednesday, March 09, 2022 7:37 AM
Good morning, ICE –

Thank you for the support preparing for and during Monday’s mediation session. As expected due to the timing, there was not a lot of substantive progress made in this session.

We scheduled the next mediation session for April 12, 2022, 11am ET, but Judge Wiler was clear that he did not want to gather everyone again if the parties were not ready to make substantive progress by that date.

Lastly, a reminder that we need DHS and ICE positions on Plaintiffs’ extension request on the en banc rehearing deadline.

Thank you,

Senior Litigation Counsel
U.S. Department of Justice, Civil Division
Office of Immigration Litigation – District Court Section
P.O. Box 868 | Ben Franklin Station | Washington, DC 20044
Direct: | Fax: (202) 305-7000 | Email: @usdoj.gov

From: @usdoj.gov
Sent: March 2, 2022 4:58 PM
To: @ice.dhs.gov; @ice.dhs.gov; @hq.dhs.gov;
Cc: @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov;

Padilla, Kenneth @ice.dhs.gov;
Subject: RE: [EXTERNAL] Fraihat

Yes, 60 days.

Deputy Director
Office of Immigration Litigation
District Court Section

From: Adam V Loiacono, Mike P Davis

Sent: Wednesday, March 02, 2022 4:57 PM

Hi

Thank you, I think that would be helpful.

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: [b](6); (b)(7)[C]

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From: [b](6); (b)(7)[C] @usdoj.gov
Sent: Wednesday, March 2, 2022 4:55 PM
To: [b](6); (b)(7)[C] @ice.dhs.gov; [b](6); (b)(7)[C] @hq.dhs.gov;
    [b](6); (b)(7)[C] @hq.dhs.gov;
Cc: [b](6); (b)(7)[C] @ice.dhs.gov; [b](6); (b)(7)[C] @ice.dhs.gov;
    [b](6); (b)(7)[C] @ice.dhs.gov;
    [b](6); (b)(7)[C] @ice.dhs.gov;
    [b](6); (b)(7)[C] @ice.dhs.gov;
    [b](6); (b)(7)[C] @ice.dhs.gov;
    [b](6); (b)(7)[C] @ice.dhs.gov;
    [b](6); (b)(7)[C] @ice.dhs.gov; Padilla, Kenneth [b](6); (b)(7)[C] @ice.dhs.gov;
    [b](6); (b)(7)[C] @ice.dhs.gov; Davis, Mike [b](6) @ice.dhs.gov;
    [b](6); (b)(7)[C] @ice.dhs.gov; Loiacono, Adam V [b](6); (b)(7)[C] @ice.dhs.gov
Subject: RE: [EXTERNAL] Fraihat

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I can ask, but I’d imagine another 60 days.

[b](6); (b)(7)[C]
Deputy Director
Office of Immigration Litigation
District Court Section
[b](6); (b)(7)[C]
Hi [b](6);

What is the timeframe Plaintiffs are requesting for another extension? I do not see the draft motion attached.

Kind regards,

[b](6);

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: [b](6); [b](7)(C)

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Please also see below, opposing counsel’s request for a further continuance of their deadline to seek en banc consideration of the Ninth Circuit’s decision. I’d like to be able to get back to them before the end of the week.

Thanks,

I hope you are doing well. The current deadline for filing a petition for rehearing en banc is April 5, so we would like to get another consent motion for an extension on file next week to allow the mediation efforts to keep proceeding. It seems like Judge Wilner has been helpful and both sides feel that mediation has been productive so far. Please let us know if the attached motion is acceptable to ICE.

Thanks,
From: [b](6); (b)(7)(C)
Sent: Wednesday, March 02, 2022 12:59 PM
To: [b](6); (b)(7)(C)  
Cc: [b](6); (b)(7)(C)  
Subject: RE: [EXTERNAL] Fraihat

Please find below Plaintiffs’ response. [b](5)

Hi [b](5) and please feel free to loop in your team)

Thank you for the below information. We will not have time to prepare written responses ahead of our March 7 meeting with your team and Judge Wilner, but we do think a meeting is still worthwhile and will be prepared to discuss the information you’ve shared at that meeting. [b](5)

[b](5)
Many thanks

Deputy Director
Office of Immigration Litigation
District Court Section

From: Deputy Director
Office of Immigration Litigation
District Court Section

Sent: Friday, February 25, 2022 12:35 PM
To: @hq.dhs.gov
Cc: @ice.dhs.gov

Subject: RE: [EXTERNAL] Faihat

Thanks everyone.

Deputy Director
Office of Immigration Litigation
District Court Section

From: Deputy Director
Office of Immigration Litigation
District Court Section

Sent: Friday, February 25, 2022 11:48 AM
To: @hq.dhs.gov
Cc: @ice.dhs.gov

Subject: RE: [EXTERNAL] Faihat
Subject: RE: [EXTERNAL] Fraiha

[b](6) please see a few edits in the attached.

Best,

[b](6)

(b)(6): (b)(7)(C)  
Assistant General Counsel for Litigation  
Legal Counsel Division  
Office of the General Counsel  
U.S. Department of Homeland Security  

(b)(6): [redacted]  

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Hi [b](6)

Not sure if my earlier email went through. We are finalizing our input. You should hear back from [b](6) [b](6) in my absence.

Kind regards,

[b](6); (b)(7)(C)  
Attorney Advisor, Litigation  
Legal Counsel Division  
Office of the General Counsel  
U.S. Department of Homeland Security  
(o) [b](6); (b)(7)(C) (m) [b](6); (b)(7)(C)  
[b](5); (b)(7)(C)  

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Subject: Re: [EXTERNAL] Fraihat

Anything on this folks? Opposing counsel is checking in on our status so they can move forward with their revised proposal.

Sent from my iPad

On Feb 24, 2022, at 11:18 AM[b(6); (b)(7)(C)]@usdoj.gov wrote:

Thanks for the call this morning. Please find attached a draft email for opposing counsel that attempts to distill our current positions. I appreciate any comments/edits that can be provided by COB, or let me know if you’ll need longer.

[b(6)];

Deputy Director
Office of Immigration Litigation
District Court Section

[b(6); (b)(7)(C)]

From:[b(6); (b)(7)(C)]@hq.dhs.gov
Sent: Wednesday, February 23, 2022 2:55 PM
To:[b(6); (b)(7)(C)]@usdoj.gov
Cc: [b(6); (b)(7)(C)]@ice.dhs.gov; [b(6); (b)(7)(C)]@ice.dhs.gov; [b(6); (b)(7)(C)]@usdoj.gov;

[b(6); (b)(7)(C)]@ice.dhs.gov; [b(6); (b)(7)(C)]@usdoj.gov;

[b(6); (b)(7)(C)]@usdoj.gov;

[b(6); (b)(7)(C)]@hq.dhs.gov; [b(6); (b)(7)(C)]@ice.dhs.gov; [b(6); (b)(7)(C)]@usdoj.gov;

Subject: RE: [EXTERNAL] Fraihat
Thanks, I will coordinate with schedule and link up with ICE to determine a time.

Kind regards,

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security

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From: @usdoj.gov>
Sent: Wednesday, February 23, 2022 2:50 PM
To: @hq.dhs.gov>
Cc: @ice.dhs.gov; @ice.dhs.gov; @ice.dhs.gov; @usdoj.gov; @hq.dhs.gov; @ice.dhs.gov; @usdoj.gov;

Subject: Re: [EXTERNAL] Fraihat

Thank you. I think a call is still warranted to clear a few of our specific asks up. Can you please propose a time that works tomorrow?
On Feb 23, 2022, at 11:32 AM, [b](6); [b](7)(C) @hq.dhs.gov> wrote:

Hi [b]6

Attached please find consolidated/updated input from DHS + ICE and let us know if there's any more follow up needed before responding. Thanks for your patience.

Kind regards,

[b](6); [b](7)(C)

Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security

[b](6); [b](7)(C) @hq.dhs.gov

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Thanks, and I see that the call was just cancelled. Should we still expect updates today, which we will then need to digest and get back to opposing counsel.

Sent from my iPhone

On Feb 22, 2022, at 9:52 AM, [b](6); (b)(7)(C)@hq.dhs.gov> wrote:

Friends—

Flagging that DHS and ICE are working on revised responses for DOJ’s review and anticipate canceling this call. We will follow up shortly.

Kind regards,

[b](6); (b)(7)(C)
Attorney Advisor, Litigation
Legal Counsel Division
Office of the General Counsel
U.S. Department of Homeland Security
(b)(6); (b)(7)(C)@hq.dhs.gov

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<Fraihat Draft Responses to OIL re Plaintiffs Mediation Follow Ups 2.22.22 (002) (2 23 22 Updated ICE DHS Input).docx>
<Fraihat 2.24 Draft Email to Counsel.docx>
Good afternoon,

Please note there is a continuous requirement for ICE to conduct custody re-determinations on all current and future Fraihat subclass members in custody, especially when there is a change in circumstances. This includes persons who reach age 55, are identified by a medical professional as pregnant, and/or with a chronic care condition while in ICE custody.

It is important that the medical provider keep us informed of detainees with these conditions so we can ensure reviews are being conducted.

Thanks,

Assistant Field Office Director
Philadelphia Field Office
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
Desk Phone Number
From: [b](6); (b)(7)(C)
Sent: Thu, 12 May 2022 15:03:21 +0000
To: [b](6); (b)(7)(C)
Cc: [b](6); (b)(7)(C)

Padilla, Kenneth [b](6); (b)(7)(C)
Loiacono, Adam V; Davis, Mike P

Subject: RE: [EXTERNAL] Fraihat

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Thank you.

We’ll pass along as is.

Deputy Director
Office of Immigration Litigation
District Court Section

From: [b](6); (b)(7)(C) @ice.dhs.gov>
Sent: Thursday, May 12, 2022 10:37 AM
To: [b](6); (b)(7)(C) @usdoj.gov>
Cc: [b](6); (b)(7)(C) @usdoj.gov>

HQ. DHS.gov>
ICE. DHS.gov>

Padilla, Kenneth [b](6); (b)(7)(C) @ice.dhs.gov>
Loiacono, Adam V

2022-ICLI-00045 4982
Hi,

ICE is asserting the law enforcement privilege over the information redacted on the I-831 for specifically, ICE asserts that the first three bullets apply:


In addition, attached is the PDF of the email. We will convey the concerns regarding the Public Safety Threat description to ERO.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile:

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From:
Sent: Wednesday, May 11, 2022 5:14 PM
To: [b](6); (b)(7)(C) @ice.dhs.gov; [b](6); (b)(7)(C)

Cc: [b](6); (b)(7)(C) @usdoj.gov; [b](6); (b)(7)(C) @hq.dhs.gov;

[b](6); (b)(7)(C) @hq.dhs.gov; [b](6); (b)(7)(C) @ice.dhs.gov;

[b](6); (b)(7)(C) @usdoj.gov; [b](6); (b)(7)(C) @hq.dhs.gov;

[b](6); (b)(7)(C) @ice.dhs.gov;

[b](6); (b)(7)(C) @ice.dhs.gov; [b](6); (b)(7)(C) @hq.dhs.gov;

[b](6); (b)(7)(C) @ice.dhs.gov; [b](6); (b)(7)(C) @usdoj.gov;

[b](6); (b)(7)(C) @ice.dhs.gov;

[b](6); (b)(7)(C) @hq.dhs.gov; [b](6); (b)(7)(C) @ice.dhs.gov;

[b](6); (b)(7)(C) @ice.dhs.gov; [b](6); (b)(7)(C) @hq.dhs.gov;

[b](6); (b)(7)(C) @ice.dhs.gov;

[b](6); (b)(7)(C) @ice.dhs.gov; [b](6); (b)(7)(C) @usdoj.gov;

[b](6); (b)(7)(C) @ice.dhs.gov; [b](6); (b)(7)(C) @usdoj.gov;

[b](6); (b)(7)(C) @ice.dhs.gov;

[b](6); (b)(7)(C) @usdoj.gov; [b](6); (b)(7)(C) @hq.dhs.gov;

[b](6); (b)(7)(C) @hq.dhs.gov; [b](6); (b)(7)(C) @ice.dhs.gov;

[b](6); (b)(7)(C)

Subject: RE: [EXTERNAL] Faihat

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Thank you,

Two quick follow-ups and one issue to flag. Please respond to the follow-ups by noon eastern tomorrow so we can send a comprehensive response that is as close to today’s original deadline as possible.

Deputy Director
Office of Immigration Litigation
District Court Section

From: [b](6); (b)(7)(C) @ice.dhs.gov

Sent: Wednesday, May 11, 2022 4:50 PM

To: [b](6); (b)(7)(C) @usdoj.gov; [b](6); (b)(7)(C)

Cc: [b](6); (b)(7)(C) @usdoj.gov; [b](6); (b)(7)(C) @hq.dhs.gov;
Hi [b](6)

Please see below ICE’s responses to the Plaintiffs’ allegations. Please mark the attached documents as confidential pursuant to the PO prior to sharing with Plaintiffs.

Previously Raised Instances of Non-Compliance

1. [b](8); [b](7); [C]) La Palma Correctional Center: Judge Bernal held that “[o]nly in rare cases should a Subclass member not subject to mandatory detention remain detained,” ECF 240 at 17, and that subclass members “should generally be released absent a specific finding they would pose a danger to property or persons,” ECF 281 at 5. ICE’s response to our summary of [b](6); [b](7) risk factors fails to provide such a justification for why [b](6); [b](7) who, per Defendants’ biweekly records, is held under non-mandatory detention authority—has been denied release despite the presence of multiple serious risk factors. This kind of extremely cursory and non-individualized response is precisely what Judge Bernal found to be noncompliant in his order granting Plaintiffs’ Motion to Enforce. See ECF 240 at 17 (“Blanket or cursory denials do not comply with the Preliminary Injunction or with the Docket Review Guidance’s instruction to make individualized determinations.”). Consequently, we request that ICE reconsider [b](6); [b](7) denial of release, or at a minimum provide an individualized, non-cursory explanation for why [b](6); [b](7) is a current public safety threat and why that threat outweighs the serious risks to his health.

a. Plaintiffs also request confirmation that ICE communicated to staff at La Palma that relevant risk factors include psychiatric conditions, ECF 240 at 18, and that the presence of any risk factor is a “significant discretionary factor in favor of release,” ECF 240 at 8.

b. Last, we request confirmation that ICE reminded relevant staff at La Palma and the Phoenix Field Office that cursory, non-individualized denials are noncompliant with Judge Bernal’s orders, and that subclass members “should generally be released absent a specific finding they would pose a danger to property or persons,” ECF 281 at 5.
2. **Krome ICE Processing Center**: It is our understanding that was unaware that ICE ever tried to serve him with a notice of custody determination. Please clarify how the contents of the document were communicate to him. Also, considering his ongoing complex medical needs as a result of carbon monoxide poisoning in ICE custody, please clarify the terms of his continued detention and how ICE plans to meet those medical needs.

ICE Response: **(b)(5)**

3. **Pike County Jail**: Plaintiffs request confirmation that the custody determination decision has been communicated to. Plaintiffs also request confirmation that ICE communicated to staff at Pike County Jail that they are required to conduct renewed *Fraihat* reviews in light of updates in subclass members’ medical conditions, ECF 240 at 17, and that the presence of any risk factor is a “significant discretionary factor in favor of release,” ECF 240 at 8.

ICE Response: **(b)(5)**

**Additional Instances of Noncompliance**

1. **Torrance County Detention Facility (TCDF)/El Paso Field Office**: Partners on the ground have reported systematic failures to identify *Fraihat* subclass members despite the presence of risk factors at Torrance County Detention Facility, as well as failures to timely review/respond to *Fraihat* requests and subsequently release subclass members without extensive pressure by attorneys and other advocates. This violates Judge Bernal’s orders clearly delineating a timeline for identifying subclass members and conducting custody reviews, and requiring Defendants to affirmatively screen for risk factors. See ECF 240 at 17. It also runs counter to his orders describing a particular concern for “the most vulnerable detainees who may have limited capability, or lack access to attorneys and others who can advocate for them.” ECF 281 at 4. Partners have also reported a general refusal from the El Paso Field Office to provide medical records to subclass members and their attorneys despite Judge Bernal’s orders mandating that Defendants establish a procedure whereby subclass members “or their counsel may promptly obtain a copy of the medical file and may supplement medical records at any time,” ECF 240 at 17, and ICE’s own PRR that reiterates that message, see PRR at 15.
a. **Request:** Plaintiffs request that Defendants communicate to relevant staff at TCDF and the El Paso Field Office regarding their obligation to affirmatively identify *Fraihat* subclass members, and clarify the qualifying risk factors. Plaintiffs further request that Defendants remind staff at TCDF of the timeline for identifying subclass members and conducting subsequent custody reviews.

![Torrance County Detention Facility:](b)(6) (b)(7)(C) Plaintiffs submitted a request regarding *(b)(6)* in their last correspondence, to which Defendants responded that *(b)(6)* does not qualify as a *Fraihat* subclass member. Yet, Defendants’ biweekly production dated April 21, 2022 still lists him as a subclass member based on risk factors of “Adjustment disorder with mixed anxiety and depressed mood,” and indicates that he was given a custody review on March 15, 2022 (after Plaintiffs brought *(b)(6)* to Defendants’ attention). In light of the systemic issues described above, Plaintiffs request that Defendants confirm that *(b)(6)* is indeed a subclass member, and reconsider his denial of release. As a reminder, *(b)* *(b)(6)* is held under nonmandatory detention authority (confirmed in Defendants’ biweekly production), and “[o]nly in rare cases should a Subclass member not subject to mandatory detention remain detained, and pursuant to the Docket Review Guidance, a justification” must be communicated to *(b)(6)* and his counsel. ECF 240 at 17.

ICE Response: *(b)(5)*

(b)(5)

2. *(b)(6) (b)(7)(C)* Adelanto ICE Processing Center: *(b)(8)* Osorio is a 62 year old man who suffers from tumors located in the neck, thyroid issues, pre-diabetes, high cholesterol, high BMI, hypoxemia and he has already contracted coronavirus while in Adelanto. *(b)(6) (b)(7)(C)* attorney submitted a *Fraihat* request on his behalf on April 7, 2022 and has yet to receive a response. He is not held pursuant to INA 236(c), per Defendants’ April 21*st*, 2022 biweekly production. Judge Bernal’s orders call for “timely” custody review, and Defendants’ own PRR requires that “[a]ll new detainees aged 55 and older who are identified as meeting any of the subclass criteria must have a custody review completed within 5 days of entering ICE custody.” PRR at 26 (emphasis added).

a. **Request:** Plaintiffs request that ICE respond to *(b)(6) (b)(7)(C)* most recent *Fraihat* request, giving primary consideration to his multiple risk factors as “significant discretionary factor[s] in favor of release,” ECF 240 at 14, 8. Plaintiffs also request that ICE communicate to staff Adelanto that they are required to conduct “timely” custody reviews, and that they must conduct renewed *Fraihat* reviews in light of updates in subclass members’ medical conditions. ECF 240 at 17.

ICE Response: *(b)(5)*

(b)(5)

3. *(b)(6) (b)(7)(C)* Folkston ICE Processing Center: *(b)(6)* has several qualifying psychiatric risk factors, including bipolar disorder, depression, unspecified mood disorder, anxiety, and PTSD as a result of sexual assault and other physical abuse when he was a minor. He has received extremely deficient mental health care while in ICE custody which has culminated in multiple suicide attempts. Despite his clearly documented mental health conditions, Defendants’ most recent biweekly production only lists hypertension as his relevant
risk factor. His attorney has notified ICE of his status as a *Fraihat* subclass member multiple times, including via several *Fraihat* requests and follow-ups submitted in August and October of 2021, January and February of 2022, and most recently a renewed request submitted with medical documentation on 4/26/2022, and **(b)(6):** attempted to notify his DO and other ICE staff directly regarding his *Fraihat* risk factors. Neither **(b)(6):** nor his attorney has received any response addressing his *Fraihat* risk factors. Despite the clear timeline for *Fraihat* review mandated by Judge Bernal’s orders, **(b)(6); (b)(7);(C)** DO told his attorney to expect a delay in the response when she reached out to him directly to follow up on the most recent of her multiple requests.

a. **Request:** Plaintiffs request that ICE promptly respond to **(b)(6); (b)(7);(C)** most recent *Fraihat* request, giving primary consideration to his multiple risk factors. See ECF 240 at 14. Plaintiffs also request that ICE communicate to staff at Folkston and the Atlanta Field Office that relevant risk factors include psychiatric conditions, ECF 240 at 18, and that the presence of any risk factor is a “significant discretionary factor in favor of release,” ECF 240 at 8. We also request that ICE remind relevant staff at Folkston and the Atlanta Field Office of the timeline for identifying subclass members and conducting subsequent custody reviews under Judge Bernal’s orders and the PRR, as well as the obligation to provide individualized explanations in the event of denial of release.

ICE Response: **(b)(5)**

(b)(5)

4. **(b)(6); (b)(7);(C)**

**LaSalle ICE Processing Center:**

**(b)(6); (b)(7);(C)** is a transgender man who has a high BMI and developed asthma as a result of contracting COVID-induced pneumonia, resulting in his hospitalization. He is additionally going blind and has a history of head injury. Notably, Defendants’ biweekly production only lists **(b)(6); (b)(7);(C)** weight as a qualifying risk factor, **(b)(6); (b)(7);(C); (b)(3);Unspecified**

**(b)(6); (b)(7);(C); (b)(3);Unspecified Statute**

**(b)(6); (b)(7);(C)** has also experienced gender-identity discrimination while in detention. The New Orleans Field Office initially failed to identify **(b)(6); (b)(7);(C)** risk factors, and only considered his case after it was raised by his attorney. The Field Office then denied his release, despite the facts that Defendants’ own biweekly production lists him as non-236(c), his criminal history does not contain crimes of violence, he does not pose a threat to the community, and he has strong community ties, including a sister and U.S. citizen brother-in-law, with whom he will reside upon release. **(b)(6); (b)(7);(C)** did not receive a formal decision or rationale in response to his *Fraihat* request; instead, his attorney was sent an e-mail that said “Your client was reviewed pursuant to *Fraihat* and the decision to continue detention was made,” **(b)(6); (b)(7);(C); (b)(3);Unspecified Statute**

a. **Request:** Plaintiffs request that ICE reconsider **(b)(6); (b)(7);(C)** most recent *Fraihat* request, giving primary consideration to his multiple risk factors as “significant discretionary factor[s] in favor of release,” ECF 240 at 14, 8. Plaintiffs also request that ICE communicate to staff at the New Orleans Field Office the standards for identification
of risk factors, that they are required to conduct “timely” custody reviews, and that they
must conduct renewed Fraihat reviews in light of updates in subclass members’ medical
conditions. ECF 240 at 17. We note that this is the second time in recent weeks that we
have brought to your attention a case that involves non-responsiveness by the New
Orleans ICE Field Office (see our correspondence regarding [b](6); (b)(7)(C)].

ICE Response:

LaSalle. [b](6); [b](7)(C) has both hypertension and hepatitis C.

Defendants’ most recent production lists only hypertension as [b](6); (b)(7)(C) risk factor. [b](6); (b)(7)(C)
was released from criminal custody on compassionate release after a U.S. District Judge (E.D.N.C.)
determined such release was warranted in light of her medical condition and the evidence of
rehabilitation she presented. ICE/ERO first determined [b](6); (b)(7)(C) ineligible for release on March 7,
2022, deeming her a public safety threat. Though [b](6); (b)(7)(C) is detained pursuant to 236(c), the
Court’s order specifically provides for the possibility of release of individuals held under mandatory
detention. ECF 240 at 15. ICE’s determination that [b](6); [b](7)(C) is a threat to public safety is at odds
with her compassionate release from criminal custody only weeks prior to her Fraihat review, following
a determination by a district judge that such release was warranted.

a. **Request:** Plaintiffs ask ICE to reconsider [b](6); (b)(7)(C) Fraihat request, giving primary
consideration to her multiple risk factors as “significant discretionary factor[s] in favor of
release” (ECF 240 at 14, 8) and specifically in light of earlier findings by a different authority
that she presented no risk to public safety.

ICE Response:

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: [b](6); (b)(7)(C)

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Information Act, 5 USC §§ 552(b)(5), (b)(7).
My apologies, sending along one additional individual class member concern from opposing counsel. This one, like at least some of the others, appears to be a basic challenge/disagreement with ICE’s custody reevaluation itself, and does not raise other compliance challenges.

Deputy Director
Office of Immigration Litigation
District Court Section
Subject: RE: [EXTERNAL] Fraihat

Please find attached another set of PI-compliance related questions from opposing counsel. We should have a response ready to send them by COB on Wednesday, 5/11. OIL therefore requests a consolidated draft response from ICE by COB on Tuesday 5/10.

Thanks,

Deputy Director
Office of Immigration Litigation
District Court Section

From: [b](5)
Sent: Tuesday, May 03, 2022 4:44 PM
To: [b](5)
Cc: [b](5)

2022-ICLI-00045  4991
Hi [b](6)

What is the exact date in June which is the deadline for Plaintiffs to file the petition for en banc review?

Kind regards,

[b](6)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
We’ll get you pros and cons re a further extension today.

One other ask from opposing counsel is whether we might be able to get them responses/reactions to the proposal (or at least portions of it) sooner, even in a piecemeal fashion.
Thanks,

[Redacted]

Deputy Director
Office of Immigration Litigation
District Court Section

From: [Redacted]@ice.dhs.gov
Sent: Monday, May 02, 2022 9:08 AM
To: [Redacted]@hq.dhs.gov; [Redacted]; [Redacted]
Cc: [Redacted]@ice.dhs.gov; [Redacted]; [Redacted]

Hi [Redacted]

Thank you, we are trying to see which of those slots may work.
Kind regards,
(b)(6);  

(b)(6); (b)(7)(C)  
Associate Legal Advisor  
U.S. Immigration and Customs Enforcement  
Office of the Principal Legal Advisor  
District Court Litigation Division  
500 12th Street SW  
Washington, D.C. 20536  
Mobile: (b)(8); (b)(7)(C)  

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From: (b)(6); (b)(7)(C)  
Sent: Thursday, April 28, 2022 4:06 PM  
To: (b)(6); (b)(7)(C)  
Cc: (b)(6); (b)(7)(C)  
(b)(6); (b)(7)(C)  
(b)(6); (b)(7)(C)  
(b)(6); (b)(7)(C)  
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(b)(6); (b)(7)(C)  
(b)(6); (b)(7)(C)  
(b)(6); (b)(7)(C)  
(b)(6); (b)(7)(C)  
(b)(6); (b)(7)(C)  
(b)(6); (b)(7)(C)  

Subject: RE: [EXTERNAL] Fraihat
I’m looping who may be plugging into this case after today and until a new immigration deputy comes onboard.

Deputy General Counsel
U.S. Department of Homeland Security

*** Warning *** Attorney/Client Privilege *** Attorney Work Product ***
This message and any attachments may contain attorney-client communications, attorney work product, and agency deliberative communications, all of which may be privileged and not subject to disclosure outside the agency or to the public. Please consult with the Department of Homeland Security, Office of General Counsel before disclosing any information contained in this email.

From: [b]@usdoj.gov
Sent: Thursday, April 28, 2022 3:49 PM
To: [b]@ice.dhs.gov
Cc: [b]@usdoj.gov; [b]@ice.dhs.gov; [b]@hq.dhs.gov;

Subject: RE: [EXTERNAL] Faihat

So that attempt at scheduling didn’t work. Here’s Plaintiffs’ response.

Any chance we can work with their hours on 5/17, and if not, what works for ICE the following week?

We can meet between 10:30 and 2:00 Pacific on 5/17. I also should clarify that, based on our previous meetings, we’re working under the assumption that this would be a two-hour session.

In the event the 5/17 times won’t work, our availability the week of May 23 is as follows (all times Pacific):

May 23: any time in the afternoon
May 24: 1:00p – 3:00p
Hi (b)(6).

Yes, we will work to have the proposal to OIL by 5/11 (b)(5).

Regarding the next mediations session, ICE’s availability is below.

- Monday (May 16)
- Tuesday between 10 and 2 (May 17)
- Friday from 9 to 3 (May 20)

Kind regards,
ATTORNEY/CLIENT PRIVILEGE --- ATTORNEY WORK PRODUCT ---

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From: (b)(6); (b)(7)(C)@usdoj.gov
Sent: Friday, April 22, 2022 12:03 PM
To: (b)(6); (b)(7)(C)@ice.dhs.gov
Cc: (b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@usdoj.gov
Subject: Re: [EXTERNAL] Fraihat

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Thank you.
Will ICE prepared to have your thoughts to us by the 11th?

(b)(5)

Sent from my iPad

On Apr 22, 2022, at 11:21 AM, [b](6); (b)(7)(C)@ice.dhs.gov wrote:

Hi [b](6)

ICE request that the mediation session be the third week of May (week of May 16), given the amount of review the proposal would need and in order to have the most productive mediation session. We are gathering availability so we can propose the dates.

Kind regards,

[b](6)

(b)(6); (b)(7)(C)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: [b](6); (b)(7)(C)

--- ATTORNEY/CLIENT PRIVILEGE --- ATTORNEY WORK PRODUCT ---

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Subject: RE: [EXTERNAL] Fraihat

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ICE, does this proposed timeline work for you? I’d like to confirm with opposing counsel and the Magistrate Judge, thanks.

Deputy Director
Office of Immigration Litigation
District Court Section

From: [redacted]
Sent: Tuesday, April 19, 2022 12:27 PM
To: [redacted]
Cc: [redacted]

Subject: RE: [EXTERNAL] Fraihat
As a suggestion, if we were to propose a day to meet with Plaintiffs the week of May 9, we could build in a few more days for ICE to develop a response – say by May 3, which we could review/discuss and send over to Plaintiffs by May 6.

From: [redacted]@ice.dhs.gov
Sent: Tuesday, April 19, 2022 12:23 PM
To: [redacted]@usdoj.gov; [redacted]@usdoj.gov; [redacted]@hq.dhs.gov
Cc: [redacted]@hq.dhs.gov; [redacted]@ice.dhs.gov; [redacted]@ice.dhs.gov; [redacted]@usdoj.gov; [redacted]@ice.dhs.gov; [redacted]@ice.dhs.gov; [redacted]@ice.dhs.gov; [redacted]@ice.dhs.gov; [redacted]@ice.dhs.gov; [redacted]@ice.dhs.gov; [redacted]@ice.dhs.gov; [redacted]@ice.dhs.gov; [redacted]@ice.dhs.gov; [redacted]@ice.dhs.gov
Subject: RE: [EXTERNAL] Frainha

Okay, thank you. ICE is considering if the timeline is feasible and will follow up.

Kind regards,

[redacted]
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From: [b](6); (b)(7)(C)@usdoj.gov
Sent: Tuesday, April 19, 2022 11:55 AM
To: [b](6); (b)(7)(C)@ice.dhs.gov; [b](6); (b)(7)(C)@usdoj.gov
Cc: [b](6); (b)(7)(C)@hq.dhs.gov; [b](6); (b)(7)(C)@ice.dhs.gov; [b](6); (b)(7)(C)@ice.dhs.gov; [b](6); (b)(7)(C)@ice.dhs.gov
Subject: RE: [EXTERNAL] Faihat

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Under Plaintiffs’ proposed timeline, we would need ICE’s responses sent to OIL by the 29th to give us a few days to review and clarify with ICE, to then transmit to opposing counsel sometime during the following week of May 2, in time for a mediation session that week. It’s an ambitious timeline to say the least.

Best,
[b](6);

From: [b](6); (b)(7)(C)@ice.dhs.gov
Sent: April 19, 2022 11:48 AM
To: [b](6); (b)(7)(C)@usdoj.gov; [b](6); (b)(7)(C)@usdoj.gov
Cc: [b](6); (b)(7)(C)@hq.dhs.gov; [b](6); (b)(7)(C)@ice.dhs.gov; [b](6); (b)(7)(C)@ice.dhs.gov; [b](6); (b)(7)(C)@usdoj.gov
Subject: [EXTERNAL] Faihat
Hi [b](6),

Thank you for sending. Would the goal be to have ICE’s responses sent to OIL by April 29 or to Plaintiffs by April 29, so to OIL a few days before then?

Kind regards,

[b](6)

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile [b](8), [b](7)(C)

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From: [b](6), [b](7)(C) usdoj.gov
Sent: Tuesday, April 19, 2022 11:20 AM
To: [b](6), [b](7)(C) usdoj.gov
Cc: [b](6), [b](7)(C) usdoj.gov

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Good morning [b](6). At long last, attached is Plaintiffs’ COVID-related settlement proposal and a note that they are awaiting two items from us, see below. Also attached is a Word version of their proposal to make internal comments easier. We are just beginning to review here as well.

They propose a mediation to discuss these proposals the first week of May, which would require a response from ICE no later than April 29, 10 days from now, to allow time to discuss and refine ICE’s responses internally before conveying to counsel in time for a mediation the week after. If that is not sufficient time, please propose an alternative window that we can respond with as soon as you can.

Plaintiffs note that they are waiting on:

1. The template proposed cover letter to accompany I-831s; and
2. The statistician’s analysis of whether ICE can create reports for subclass members that include entire detention histories.

Thank you.

From: [b](6); [b](7)(C) @ice.dhs.gov>
Sent: April 15, 2022 5:43 PM
To: [b](6); [b](7)(C) @usdoj.gov>
Cc: [b](6); [b](7)(C) @usdoj.gov; [b](6); [b](7)(C) @hq.dhs.gov; [b](6); [b](7)(C) @ice.dhs.gov;
[b](6); [b](7)(C) @hq.dhs.gov; [b](6); [b](7)(C) @ice.dhs.gov; [b](6); [b](7)(C) @ice.dhs.gov; [b](6); [b](7)(C) @ice.dhs.gov; [b](6); [b](7)(C) @ice.dhs.gov; [b](6); [b](7)(C) @ice.dhs.gov; [b](6); [b](7)(C) @ice.dhs.gov; [b](6); [b](7)(C) @ice.dhs.gov; [b](6); [b](7)(C) @ice.dhs.gov; [b](6); [b](7)(C) @HQ.DHS.GOV; [b](6); [b](7)(C)
Hi,

In addition, ICE agrees to provide Plaintiffs with the newly updated directive, marked as confidential pursuant to the PO.

Kind regards,

Associate Legal Advisor
U.S. Immigration and Customs Enforcement
Office of the Principal Legal Advisor
District Court Litigation Division
500 12th Street SW
Washington, D.C. 20536
Mobile: (b)(6) (b)(7)(C)

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From: (b)(6) (b)(7)(C) @usdoj.gov
Sent: Wednesday, April 13, 2022 2:33 PM
Subject: RE: [EXTERNAL] Fraihat

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Folks,

Please note that we still owe opposing counsel a response regarding the process for negotiating the claims in the complaint itself. I’ve made a verbal suggestion of what our response could look like to [b](5); [b](7)(E) but we haven’t heard further from ICE.

[b](6); [b](7)(C)
Deputy Director
Office of Immigration Litigation
District Court Section
[b](8); [b](7)(C)

From: [b](6); [b](7)(C)
Sent: Thursday, April 07, 2022 2:25 PM
To: [b](6); [b](7)(C)
Cc: [b](6); [b](7)(C)
August 30, 2022

Rebecca Sheff  
ACLU of New Mexico  
P.O. Box 566  
Albuquerque, NM 87103  
rsheff@aclu-nm.org

RE: Innovation Law Lab v. ICE  
ICE FOIA Case Number 2022-ICLI-00045  
Second Interim Response

Dear Ms. Sheff:

This is the second interim response to your client’s Freedom of Information Act (FOIA) request to U.S. Immigration and Customs Enforcement (ICE) dated June 13, 2022. Your FOIA request sought various categories of records related to Torrance County Detention Facility (“TCDF”).

ICE has considered your request under the FOIA, 5 U.S.C. § 552, and processed 1182 pages of potentially responsive documents that were located by ICE’s Office of Acquisition Management (OAM), Office of Professional Responsibility (OPR), the Director’s Office (DIR) and the Chief of Staff (COS). ICE determined that 581 pages may be released in full. 54 pages were found to be duplicative, 31 pages are withheld in full, and 503 pages are being released in part and 1 page was non-responsive. The 1,115 pages for release are Bates numbered 2022-ICLI-00045 655 through 2022-ICLI-00045 1769. ICE has applied FOIA Exemptions (b)(5) (b)(6), (b)(7)(C), and (b)(7)(E) to portions of these pages as described below. Additionally, 12 pages were sent for consultation with another agency.

FOIA Exemption 5 protects inter-agency or intra-agency memorandums or letters which not be available by law to a party other than an agency in litigation with the agency. The deliberative process privilege protects the integrity of the deliberative or decision-making processes within the agency by exempting from mandatory disclosure opinions, conclusions, and recommendations included within inter-agency or intra-agency memoranda or letters. The release of this internal information would discourage the expression of candid opinions and inhibit the free and frank exchange of information among agency personnel. The attorney work-product privilege protects documents and other memoranda prepared by an attorney in contemplation of litigation. The attorney-client privilege protects confidential communications between an attorney and his client relating to a legal matter for which the client has sought professional advice. It applies to facts divulged by a client to his attorney, and encompasses any opinions given by an attorney to his client based upon, and thus reflecting, those facts, as well as communications between attorneys that
reflect client-supplied information. The attorney-client privilege is not limited to the context of litigation.

ICE has applied FOIA Exemptions 6 and 7(C) to protect from disclosure the names, e-mail addresses, and phone numbers of ICE and DHS employees contained within the documents, as well as the names, and other personally identifiable information of other individuals contained within the records.

FOIA Exemption 6 exempts from disclosure information in personnel or medical files and similar files the release of which would cause a clearly unwarranted invasion of personal privacy. This requires a balancing of the public’s right to disclosure against the individual’s right to privacy. The privacy interests of the individuals in the records you have requested outweigh any minimal public interest in disclosure of the information. Any private interest you may have in that information does not factor into the aforementioned balancing test.

FOIA Exemption 7(C) protects records or information compiled for law enforcement purposes when production of such could reasonably be expected to constitute an unwarranted invasion of personal privacy. This exemption takes particular note of the strong interests of individuals, whether they are suspects, witnesses, or investigators, in not being unwarrantably associated with alleged criminal activity. That interest extends to persons who are not only the subjects of the investigation, but those who may have their privacy invaded by having their identities and information about them revealed in connection with an investigation. Based upon the traditional recognition of strong privacy interests in law enforcement records, categorical withholding of information that identifies third parties in law enforcement records is ordinarily appropriate.

ICE has applied FOIA Exemption 7(E) to protect from disclosure internal agency case numbers and other law enforcement sensitive information contained within the documents.

FOIA Exemption 7(E) protects records compiled for law enforcement purposes, the release of which would disclose techniques and/or procedures for law enforcement investigations or prosecutions or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law. ICE has determined that disclosure of certain law enforcement sensitive information contained within the responsive records could reasonably be expected to risk circumvention of the law. Additionally, the techniques and procedures at issue are not well known to the public.

If you have any questions about this letter, please Assistant U.S. Attorney Manny Lucero at Manny.Lucero@usdoj.gov.

Sincerely,

LYNNEA A SCHURKAMP
Lynnea Schurkamp
Deputy FOIA Officer

Enclosure(s): 1,115 pages

cc: AUSA Manny Lucero

www.ice.gov
This is kind of interesting. I can definitely see us going back to this blueprint as we’re preparing for next year’s annual report...

Thanks for your availability, Deb. I don’t recommend rescheduling since there are about a dozen groups who RSVP’ed and it’s a couple hours from now. These are the folks who will be engaging the administration as a whole. We wanted to build trust and I think Jason’s idea of engaging them right after the Blueprint came out is a good one. They are mostly going to talk about their recommendations.

What Jason envisioned is a conversation so hope we can engage with them that way. They understand the parameters I set with them (we are not ready to commit, off the record, etc.).

Deb, I will add you now—see attached blueprint--- pgs 1-5 for exec summary and 16-19 on the ICE-related recommendations.

Onward.

Francey Lim Youngberg
Assistant Director
Department of Homeland Security/Immigration and Customs Enforcement
Office of Partnership and Engagement
From: Fleischaker, Deborah@ice.dhs.gov
Sent: Wednesday, March 2, 2022 1:39 PM
To: Trickler-McNulty, Claire@ice.dhs.gov; Houser, Jason P@ice.dhs.gov; Youngberg, Francey L@ice.dhs.gov
Cc: @ice.dhs.gov; @ice.dhs.gov

Subject: RE: 4:30 pm AR sync up conflicts with the Blueprint stakeholder meeting that you requested

Me too. Am not currently on the invite, but can pull it off of Jason’s calendar.

From: Trickler-McNulty, Claire@ice.dhs.gov
Sent: Wednesday, March 2, 2022 1:38 PM
To: Houser, Jason P@ice.dhs.gov; Youngberg, Francey L@ice.dhs.gov
Cc: @ice.dhs.gov; Fleischaker, Deborah@ice.dhs.gov

Subject: RE: 4:30 pm AR sync up conflicts with the Blueprint stakeholder meeting that you requested

I am happy to still do the call today, or push to next week.

From: Houser, Jason P@ice.dhs.gov
Sent: Wednesday, March 2, 2022 1:35 PM
To: Youngberg, Francey L@ice.dhs.gov
Cc: @ice.dhs.gov; Trickler-McNulty, Claire@ice.dhs.gov; Fleischaker, Deborah@ice.dhs.gov

Subject: RE: 4:30 pm AR sync up conflicts with the Blueprint stakeholder meeting that you requested

Looping in Deb and Claire

If Deb and Claire can lead the discussion, we can leave to today.

It’s also perfectly fine to reschedule this call u til next week.

The fire drills on annual report, and Torrence , Sheriff were unforeseen

Jason P Houser
(202) 295-

From: Youngberg, Francey L@ice.dhs.gov
Date: Wednesday, Mar 02, 2022, 1:07 PM
To: Houser, Jason P. (6) (7)(C)@ice.dhs.gov
Cc: (6) (7)(C)@ice.dhs.gov
Subject: 4:30 pm AR sync up conflicts with the Blueprint stakeholder meeting that you requested

Hey Jason, you might want to reschedule please. Thanks!

Francey Lim Youngberg
Assistant Director
Department of Homeland Security/Immigration and Customs Enforcement
Office of Partnership and Engagement
(6) (7)(C)@ice.dhs.gov
Blue prints...

This is kind of interesting. I can definitely seeing us going back to this blueprint as we’re preparing for next years annual report...
Subject: RE: 4:30 pm AR sync up conflicts with the Blueprint stakeholder meeting that you requested

Importance: High

Thanks for your availability, Deb. I don’t recommend rescheduling since there are about a dozen groups who RSVP’ed and it’s a couple hours from now. These are the folks who will be engaging the administration as a whole. We wanted to build trust and I think Jason’s idea of engaging them right after the Blueprint came out is a good one. They are mostly going to talk about their recommendations. What Jason envisioned is a conversation so hope we can engage with them that way. They understand the parameters I set with them (we are not ready to commit, off the record, etc.).

Deb, I will add you now—see attached blueprint--- pgs 1-5 for exec summary and 16-19 on the ICE-related recommendations.

Onward.

Francey Lim Youngberg
Assistant Director
Department of Homeland Security/Immigration and Customs Enforcement
Office of Partnership and Engagement

From: Fleischaker, Deborah
Sent: Wednesday, March 2, 2022 1:39 PM
To: Trickler-McNulty, Claire; Houser, Jason P; Youngberg, Francey L
Cc: Trickler-McNulty, Claire; Houser, Jason P; Youngberg, Francey L; Fleischaker, Deborah

Subject: RE: 4:30 pm AR sync up conflicts with the Blueprint stakeholder meeting that you requested

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From: Trickler-McNulty, Claire
Sent: Wednesday, March 2, 2022 1:38 PM
To: Houser, Jason P; Youngberg, Francey L
Cc: Trickler-McNulty, Claire; Houser, Jason P; Youngberg, Francey L; Fleischaker, Deborah

Subject: RE: 4:30 pm AR sync up conflicts with the Blueprint stakeholder meeting that you requested

I am happy to still do the call today, or push to next week.
From: Houser, Jason P @ice.dhs.gov
Sent: Wednesday, March 2, 2022 1:35 PM
To: Youngberg, Francey L @ice.dhs.gov
Cc: Trickler-McNulty, Claire @ice.dhs.gov; Fleischaker, Deborah @ice.dhs.gov

Subject: RE: 4:30 pm AR sync up conflicts with the Blueprint stakeholder meeting that you requested

Looping in Deb and Claire

If Deb and Claire can lead the discussion, we can leave to today.

It’s also perfectly fine to reschedule this call u til next week.

The fire drills on annual report, and Torrence, Sheriff were unforeseen

Jason P Houser
(202) 295-

From: Youngberg, Francey L @ice.dhs.gov
Date: Wednesday, Mar 02, 2022, 1:07 PM
To: Houser, Jason P @ice.dhs.gov
Cc: @ice.dhs.gov

Subject: 4:30 pm AR sync up conflicts with the Blueprint stakeholder meeting that you requested

Hey Jason, you might want to reschedule please. Thanks!

Francey Lim Youngberg
Assistant Director
Department of Homeland Security/Immigration and Customs Enforcement
Office of Partnership and Engagement
@ice.dhs.gov
Checking in again for this week’s report that goes up. We will get questions about the status of Torrance and the publication date of the PRR with reduced quarantine times. Any updates we can provide on either?

I don’t think there is anything novel on DD today. We provided the plan (with DOJ) this week to keep enrollments at 70k. This will significantly slow new enrollments.

Sent with BlackBerry Work
(>www.blackberry.com<)

Thanks, much appreciated. I know we’re going in circles on a lot of this stuff, but we’re asked about it constantly so just need to make sure we know the latest and don’t miscommunicate where things stand. WHCO is responsible for coordinating with DOJ/OGC/CDC on the 75 percent issue given the litigation concern and I suspect they have not achieved consensus yet.
On Torrence... next Tuesday we should have something firmed up. Lots of discussion with the field.

On beds... as briefed to [redacted] we provided our input on operationalizing social distancing – and removal of the 75% capacity cap to DHS, OGC, and DOJ. We are awaiting their guidance. Once lifted, we would then need to look at Fraihat, other litigation, etc. Has NSC/DPC been able to move OGC/DOJ/CDC on this cap?

On PRR, I will check.

On DD, I defer to Claire, but as shared with [redacted] we could definitely broaden our way on non-detained removals, etc.

Jason P Houser
(Acting) Chief of Staff
Immigration & Customs Enforcement (ICE)
[redacted]
dhs.gov (HSDN)
[redacted]

(202) 295-8580 (Cell)
(202) 732-1018 (Office)

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From: [redacted]@who.eop.gov
Sent: Friday, February 25, 2022 1:40 PM
To: Trickler-McNulty, Claire [redacted]; Houser, Jason P [redacted]
Subject: Closing the loop on a few things

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We’re putting together our weekly report and I know I/we will be asked about:

- Any updates on ICE’s response to the DHS/OIG report about moving detainees out of Torrance?
- Do we have an solid estimate of how many beds could potentially be brought back online by eliminating the 75 percent capacity limitation and/or any updates on where exactly that conversation is as of today?
- Do we have a target publication date for the new PRR w/ the 10 day quarantine time?
- Anything else on dedicated docket removals that we can share that hasn’t already been shared?
Happy to chat/Zoom if easier.

(b)(6); (b)(7)(C)

Domestic Policy Council
(202) 881-6141
Our Torrance response is with OGC.

As for updated PRR, I can check with Kerry.

Jason P Houser
(Acting) Chief of Staff
Immigration & Customs Enforcement (ICE)
@ice.dhs.gov
dhs.gov (HSDN)
c.gov
(202) 295-7060 (Cell)
(202) 732-2990 (Office)

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I don’t think there is anything novel on DD today. We provided the plan (with DOJ) this week to keep enrollments at 70k. This will significantly slow new enrollments.
Sent with BlackBerry Work
(>www.blackberry.com<)

From: Houser, Jason P <jason.houser@ice.dhs.gov>, Trickler-McNulty, Claire <claire.trickler-mcnulty@ice.dhs.gov>
Date: Friday, Feb 25, 2022, 11:11 AM
To: Houser, Jason P <jason.houser@ice.dhs.gov>, Trickler-McNulty, Claire <claire.trickler-mcnulty@ice.dhs.gov>
Subject: RE: Closing the loop on a few things

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From: Houser, Jason P <jason.houser@ice.dhs.gov>
Sent: Friday, February 25, 2022 1:46 PM
To: Houser, Jason P <jason.houser@ice.dhs.gov>, Trickler-McNulty, Claire <claire.trickler-mcnulty@ice.dhs.gov>
Subject: RE: Closing the loop on a few things

On Torrence... next Tuesday we should have something firmed up. Lots of discussion with the field.

On beds... as briefed to us we provided our input on operationalizing social distancing – and removal of the 75% capacity cap to DHS, OGC, and DOJ. We are awaiting their guidance. Once lifted, we would then need to look at Fraihat, other litigation, etc. Has NSC/DPC been able to move OGC/DOJ/CDC on this cap?

On PRR, I will check.

On DD, I defer to Claire, but as shared with us we could definitely broaden our way on non-detained removals, etc.

Jason P Houser
(Acting) Chief of Staff
Immigration & Customs Enforcement (ICE)

(202) 295-3025 (Office)
(202) 732-3025 (Cell)
(202) 732-3025 (Cell)
(202) 732-3025 (Cell)
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From: @who.eop.gov
Sent: Friday, February 25, 2022 1:40 PM
To: Trickler-McNulty, Claire @ice.dhs.gov; Houser, Jason P @ice.dhs.gov
Subject: Closing the loop on a few things

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- Anything else on dedicated docket removals that we can share that hasn’t already been shared?

Happy to chat/Zoom if easier.

Domestic Policy Council
(202) 881-7777
Thanks, any more details we can provide on Torrance? I’m 100% going to get asked for more than that. It’s of interest. I don’t know why other than it has more to do with NM dynamics than ICE or the facility itself. The OIG gave ICE 7 days to respond. Did we ask for or receive an extension from the OIG – if so, what’s the new deadline to respond?

Our Torrance response is with OGC.

As for updated PRR, I can check with Kerry.

Jason P Houser
(Acting) Chief of Staff
Immigration & Customs Enforcement (ICE)

er@ice.dhs.gov
@dhs.gov (HSDN)
S.C.GOV
(202) 295 7322 (Office)
(202) 732 3925 (Cell)

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From: Trickler-McNulty, Claire @ice.dhs.gov
Sent: Friday, February 25, 2022 3:00 PM
To: Houser, Jason P @who.eop.gov, Trickler-McNulty, Claire @ice.dhs.gov
Subject: RE: Closing the loop on a few things

I don’t think there is anything novel on DD today. We provided the plan (with DOJ) this week to keep enrollments at 70k. This will significantly slow new enrollments.

Sent with BlackBerry Work
(www.blackberry.com<<)

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From: Houser, Jason P @ice.dhs.gov
Date: Friday, Feb 25, 2022, 11:11 AM
To: Houser, Jason P @ice.dhs.gov, Trickler-McNulty, Claire @ice.dhs.gov
Subject: RE: Closing the loop on a few things

Thanks, much appreciated. I know we’re going in circles on a lot of this stuff, but we’re asked about it constantly so just need to make sure we know the latest and don’t miscommunicate where things stand. WHCO is responsible for coordinating with DOJ/OGC/CDC on the 75 percent issue given the litigation concern and I suspect they have not achieved consensus yet.

From: Houser, Jason P @ice.dhs.gov
Sent: Friday, February 25, 2022 1:46 PM
To: Houser, Jason P @who.eop.gov; Trickler-McNulty, Claire @ice.dhs.gov
Subject: RE: Closing the loop on a few things

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On beds... as briefed to we provided our input on operationalizing social distancing – and removal of the 75% capacity cap to DHS, OGC, and DOJ. We are awaiting their guidance. Once lifted, we would then need to look at Frailiat, other litigation, etc. Has NSC/DPC been able to move OGC/DOJ/CDC on this cap?
On PRR, I will check.

On DD, I defer to Claire, but as shared with we could definitely broaden our way on non-detained removals, etc.

Jason P Houser
(Acting) Chief of Staff
Immigration & Customs Enforcement (ICE)

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From: @who.eop.gov
Sent: Friday, February 25, 2022 1:40 PM
To: Trickler-McNulty, Claire; Houser, Jason P
Subject: Closing the loop on a few things

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We’re putting together our weekly report and I know I/we will be asked about...

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- Do we have an solid estimate of how many beds could potentially be brought back online by eliminating the 75 percent capacity limitation and/or any updates on where exactly that conversation is at as of today?
- Do we have a target publication date for the new PRR w/ the 10 day quarantine time?
- Anything else on dedicated docket removals that we can share that hasn’t already been shared?

Happy to chat/Zoom if easier.

Domestic Policy Council
(202) 88...
Zoom or Teams me.

Jason P Houser  
(Acting) Chief of Staff  
Immigration & Customs Enforcement (ICE) 

@ice.dhs.gov  
dhs.gov (HSDN)  
c.gov  
(202) 295-3072 (Office)  
(202) 732-1344 (Cell)  

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Our Torrance response is with OGC.

As for updated PRR, I can check with
From: @who.eop.gov
Sent: Friday, March 4, 2022 10:16 AM
To: Trickler-McNulty, Claire; Houser, Jason P
Subject: RE: Closing the loop on a few things

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Checking in again for this week’s report that goes up. We will get questions about the status of Torrance and the publication date of the PRR with reduced quarantine times. Any updates we can provide on either?

From: Trickler-McNulty, Claire
Sent: Friday, February 25, 2022 3:00 PM
To: @who.eop.gov; Houser, Jason P
Subject: RE: Closing the loop on a few things

I don’t think there is anything novel on DD today. We provided the plan (with DOJ) this week to keep enrollments at 70k. This will significantly slow new enrollments.

Sent with BlackBerry Work
(>>www.blackberry.com<<;)

From: @who.eop.gov
Date: Friday, Feb 25, 2022, 11:11 AM
To: Houser, Jason P; Trickler-McNulty, Claire
Subject: RE: Closing the loop on a few things
Thanks, much appreciated. I know we’re going in circles on a lot of this stuff, but we’re asked about it constantly so just need to make sure we know the latest and don’t miscommunicate where things stand. WHCO is responsible for coordinating with DOJ/OGC/CDC on the 75 percent issue given the litigation concern and I suspect they have not achieved consensus yet.

On Torrence... next Tuesday we should have something firmed up. Lots of discussion with the field.

On beds... as briefed to we provided our input on operationalizing social distancing – and removal of the 75% capacity cap to DHS, OGC, and DOJ. We are awaiting their guidance. Once lifted, we would then need to look at Fraihat, other litigation, etc. Has NSC/DPC been able to move OGC/DOJ/CDC on this cap?

On PRR, I will check.

On DD, I defer to Claire, but as shared we could definitely broaden our way on non-detained removals, etc.

Jason P Houser
(Acting) Chief of Staff
Immigration & Customs Enforcement (ICE)

From: Houser, Jason P
Sent: Friday, February 25, 2022 1:46 PM
To: Trickler-McNulty, Claire
Subject: RE: Closing the loop on a few things

From: Houser, Jason P
Sent: Friday, February 25, 2022 1:40 PM
To: Trickler-McNulty, Claire; Houser, Jason P
Subject: Closing the loop on a few things

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- Anything else on dedicated docket removals that we can share that hasn’t already been shared?

Happy to chat/Zoom if easier.

Domestic Policy Council
(202) 887

2022-ICLI-00045  7680
Okay. Can we do 11:30 or later?

Zoom or Teams me.

Jason P Houser
(Arcting) Chief of Staff
Immigration & Customs Enforcement (ICE)

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itself. The OIG gave ICE 7 days to respond. Did we ask for or receive an extension from the OIG – if so, what’s the new deadline to respond?

From: Houser, Jason P @ice.dhs.gov
Sent: Friday, March 4, 2022 10:17 AM
To: @who.eop.gov; Trickler-McNulty, Claire @ice.dhs.gov
Subject: RE: Closing the loop on a few things

Our Torrance response is with OGC.

As for updated PRR, I can check with

Jason P Houser
(Acting) Chief of Staff
Immigration & Customs Enforcement (ICE)

(202) 732 (Cell)
(202) 295 (Office)

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From: @who.eop.gov
Sent: Friday, March 4, 2022 10:16 AM
To: Trickler-McNulty, Claire @ice.dhs.gov; Houser, Jason P @ice.dhs.gov
Subject: RE: Closing the loop on a few things

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From: Trickler-McNulty, Claire @ice.dhs.gov
Sent: Friday, February 25, 2022 3:00 PM
To: @who.eop.gov; Houser, Jason P @ice.dhs.gov
Subject: RE: Closing the loop on a few things
I don’t think there is anything novel on DD today. We provided the plan (with DOJ) this week to keep enrollments at 70k. This will significantly slow new enrollments.

Sent with BlackBerry Work
(www.blackberry.com)

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From: Houser, Jason P @ice.dhs.gov
Date: Friday, Feb 25, 2022, 11:11 AM
To: Houser, Jason P @ice.dhs.gov, Trickler-McNulty, Claire @who.eop.gov
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From: Houser, Jason P @ice.dhs.gov
Sent: Friday, February 25, 2022 1:46 PM
To: Houser, Jason P @ice.dhs.gov; Trickler-McNulty, Claire @who.eop.gov
Subject: RE: Closing the loop on a few things

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On PRR, I will check.

On DD, I defer to Claire, but as shared, we could definitely broaden our way on non-detained removals, etc.

Jason P Houser
(Acting) Chief of Staff
Immigration & Customs Enforcement (ICE)
(ice.dhs.gov)
(ice.dhs.gov) (HSDN)
Subject: Closing the loop on a few things

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Happy to chat/Zoom if easier.

Domestic Policy Council
(202) 884-
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Jason P Houser
(Acting) Chief of Staff
Immigration & Customs Enforcement (ICE)

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- Anything else on dedicated docket removals that we can share that hasn’t already been shared?

Happy to chat/Zoom if easier.

Domestic Policy Council
(202) 881-
Sure.

Working through that right now.

Can we talk at 11pm?

Also have an item on Torrence.

Jason P Houser
(Acting) Chief of Staff
Immigration & Customs Enforcement (ICE)

(b)(6), (b)(7)(C)
@ice.dhs.gov
dhs.gov (HSDN)
c.gov
(202) 295-6130
(Cell)
(202) 732-8500 (Office)

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From: Jason P Houser <ice.dhs.gov>
Sent: Wednesday, March 2, 2022 10:50 AM
To: Houser, Jason P <ice.dhs.gov>
Cc: Price, Corey A <ice.dhs.gov>; Bible, Daniel <ice.dhs.gov>
Subject: Annual report roll-out

Jason – whenever you have a chance, can I connect with you, along with someone on my team, about the annual report roll-out?
Sure thing. I might be asleep at 11pm though. See you in four mins. Thanks!

Working through that right now.

Can we talk at 11pm?

Also have an item on Torrence.

Jason P Houser
(Acting) Chief of Staff
Immigration & Customs Enforcement (ICE)

(dhs.gov)
(dhs.gov) (HSDN)
(c.gov)
(202) 295-6753 (Cell)
(202) 734-7359 (Office)

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whenever you have a chance, can I connect with you, along with someone on my team, about the annual report roll-out?
Can you add a MS Teams link?

Sure.

Working through that right now.

Can we talk at 11pm?

Also have an item on Torrence.

Jason P Houser  
(Acting) Chief of Staff  
Immigration & Customs Enforcement (ICE)

(202) 295-2050 (Cell)  
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Jason – whenever you have a chance, can I connect with you, along with someone on my team, about the annual report roll-out?
Loopying in Deb and Claire
If Deb and Claire can lead the discussion, we can leave to today.
It’s also perfectly fine to reschedule this call until next week.
The fire drills on annual report, and Torrence, Sheriff [Redacted] were unforeseen.

Jason P Houser
(202) 295-

Hey Jason, you might want to reschedule please. Thanks!

Francecy Lim Youngberg
Assistant Director
Department of Homeland Security/Immigration and Customs Enforcement
Office of Partnership and Engagement
[Redacted]
I am happy to still do the call today, or push to next week.

If Deb and Claire can lead the discussion, we can leave to today.

It’s also perfectly fine to reschedule this call u til next week.

The fire drills on annual report, and Torrence, Sher were unforeseen

Jason P Houser
(202) 295

Hey Jason, you might want to reschedule please. Thanks!
Me too. Am not currently on the invite, but can pull it off of Jason’s calendar.

I am happy to still do the call today, or push to next week.

Looping in Deb and Claire

If Deb and Claire can lead the discussion, we can leave to today.

It’s also perfectly fine to reschedule this call u til next week.

The fire drills on annual report, and Torrence , Sheriff were unforeseen

Jason P Houser
(202) 295

From: Youngberg, Francey L
Sent: Wednesday, Mar 02, 2022, 1:07 PM
Date: Wednesday, Mar 02, 2022, 1:07 PM
To: Houser, Jason P. @ice.dhs.gov
Cc: @ice.dhs.gov

Subject: 4:30 pm AR sync up conflicts with the Blueprint stakeholder meeting that you requested

Hey Jason, you might want to reschedule please. Thanks!

Francey Lim Youngberg
Assistant Director
Department of Homeland Security/Immigration and Customs Enforcement
Office of Partnership and Engagement
@ice.dhs.gov
Thanks for your availability, Deb. I don’t recommend rescheduling since there are about a dozen groups who RSVP’ed and it’s a couple hours from now. These are the folks who will be engaging the administration as a whole. We wanted to build trust and I think Jason’s idea of engaging them right after the Blueprint came out is a good one. They are mostly going to talk about their recommendations.

What Jason envisioned is a conversation so hope we can engage with them that way. They understand the parameters I set with them (we are not ready to commit, off the record, etc.).

Deb, I will add you now—see attached blueprint--- pgs 1-5 for exec summary and 16-19 on the ICE-related recommendations.

Onward.

Francey Lim Youngberg
Assistant Director
Department of Homeland Security/Immigration and Customs Enforcement
Office of Partnership and Engagement

From: Fleischaker, Deborah @ice.dhs.gov
Sent: Wednesday, March 2, 2022 1:39 PM
To: Trickler-McNulty, Claire @ice.dhs.gov>; Houser, Jason P @ice.dhs.gov>; Youngberg, Francey L @ice.dhs.gov>
Cc: @ice.dhs.gov>
Subject: RE: 4:30 pm AR sync up conflicts with the Blueprint stakeholder meeting that you requested

Me too. Am not currently on the invite, but can pull it off of Jason’s calendar.
I am happy to still do the call today, or push to next week.

Looping in Deb and Claire

If Deb and Claire can lead the discussion, we can leave to today.

It’s also perfectly fine to reschedule this call u til next week.

The fire drills on annual report, and Torrence, Sheri were unforeseen

Jason P Houser
(202) 295

Hey Jason, you might want to reschedule please. Thanks!

Francey Lim Youngberg
Assistant Director
Department of Homeland Security/Immigration and Customs Enforcement
Office of Partnership and Engagement
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2022 Immigration Priorities

A Blueprint for the Biden-Harris Administration
The Biden administration started with an ambitious immigration plan and an experienced team, and although there was some modest success in reversing or terminating certain immigration policies, there is deep disappointment in the speed and substance of the planning for, and investing in, the restoration and expansion of access to asylum and other protections at the border, to deliver lasting protections for immigrant families in the United States, and to take decisive action to reimagine and reform our immigration and militarized enforcement systems.

This year, the administration must double down on efforts to pass a reconciliation bill with immigration provisions, designate all countries eligible for Temporary Protected Status (TPS), increase current programs that respond to regional development and humanitarian challenges, introduce new safe pathways to the United States, restore asylum access at the border, and more aggressively shift the immigration system toward a model that prioritizes safe and humane migration.

By December 2021, the administration had terminated or revoked 235 of the over 1,000 anti-immigrant Trump policies and implemented dozens of new immigration policies consistent with a safe and humane immigration system. Successes included lifting the Muslim, African, wealth, and health bans, ending worksite raids, protection for over 477,000 people from removal to countries in strife through Temporary Protected Status (TPS) and Deferred Enforced Departure (DED) (among notable exceptions), and creating the Family Reunification Task Force.

Many of the actions by the administration thus far were identified as priorities in the 2021 Immigration Action Plan issued by 235 organizations in August 2020 to guide the new administration, and much of the progress in 2021 was the result of arduous work over many years by immigrants and refugees, immigration and civil rights advocates, non-governmental organizations, and many others working at the national and state levels, including local efforts to terminate detention contracts, close detention centers, and end local law enforcement cooperation with ICE.
Despite their progress, the Biden administration fell short in its first year towards fulfilling the promise of a safe, just, and humane immigration system. Some of the previous administration's most egregious policies remain in place, and bolder action is needed in critical areas. The border remains closed to asylum seekers due to the continuation and expansion of two major Trump-era policies: Remain in Mexico (Migrant Protection Protocols, MPP) and Title 42. After reinstating the MPP under court order, the administration expanded the criteria for who would be covered under the program, applying it to all nationals of the Western Hemisphere despite its own arguments that the program is inhumane.

The Biden administration continues to implement Title 42 restrictions, which disproportionately affect Haitian asylum seekers, despite condemnation from human rights groups and public health professionals. Immigration detention also grew by over 50%, from roughly 15,000 at the beginning of the Biden presidency to over 22,000 in January 2022. Despite moves to reunify formerly separated families, the Department of Justice was arguing against reparations for these deeply traumatized parents by December of last year. While some of the administration's efforts were stymied by anti-immigrant Attorneys General, other measures were either not pursued or abandoned, including TPS designations and re-designations for a myriad of eligible countries and meaningful efforts to address the growing adjudication backlog at U.S. Citizenship and Immigration Services (USCIS).

With COVID-19 still raging, the pandemic has highlighted the contributions and sacrifices of essential immigrant workers. A majority of Americans continue to support a pathway to citizenship for these workers and others. Despite this, Congress has still not passed such legislation even as essential immigrant workers continue risking their lives to care for America's communities amid severe labor supply shortages across the country.

This report identifies where the administration has succeeded, and where it has not, in six core immigration policy areas. In 2022, the Biden administration should honor its commitment to revoke Trump-era policies, eliminate and decrease the criminalization and incarceration of immigrants, prioritize family reunification through the use of Temporary Protected Status and other statutory avenues, and pursue policies that promote a safe, just, and humane immigration system. It should lean into the commitments made to immigrants and their families by implementing policies that recognize their essential contributions, put them on stable legal ground while they await a legislative pathway to citizenship, and resolve the increasinglybacklogged system. Finally, the administration should prioritize affirmative, pro-immigrant policies that go beyond returning to the status quo, which has long been untenable. This will help renew the trust of non-governmental organizations (NGOs) and other allies who support the ambitious vision for a restored, humane, and just immigration system.

President Biden inherited a broken immigration system usurped and weaponized to advance the Trump administration’s racist and xenophobic governing agenda. Biden’s Day One plan included actions to: 1) establish a pathway to citizenship for our 11 million undocumented friends and families through sweeping legislative proposals; 2) reverse the cruelty and chaos of Trump’s anti-immigrant agenda; and 3) reorient every immigration agency, policy, and practice toward fairness. As certain Republican leaders continue to embrace the nativist politics of Donald Trump to stoke fear and division and block needed reforms at every turn, strong leadership on immigration is critically needed.

As we begin 2022, the administration enters a pivotal period: President Biden must deliver on his commitment to a more fair, humane, and functional immigration system—or risk political fallout, ongoing harm to families, and undermining American values and competitiveness.
The 2022 Immigration Priorities: A Blueprint for the Biden-Harris Administration has been endorsed by the following organizations:

African Communities Together (ACT)
Alianza Americas
American Immigration Lawyers Association (AILA)
America's Voice (AV)
Asian Americans Advancing Justice | AAJC
Asian Pacific Institute on Gender-Based Violence (API-GBV)
ASISTA
Cameroon Advocacy Network (CAN)
Catholic Legal Immigration Network, Inc. (CLINIC)
Center for Law and Social Policy (CLASP)
Central American Resource Center of Northern CA - CARECEN SF
Church World Service (CWS)
First Focus
Haitian Bridge Alliance (HBA)
Human Rights First (HRF)
Immigration Hub
International Refugee Assistance Project (IRAP)
National Partnership for New Americans (NPNA)
Refugee and Immigrant Center for Education and Legal Services (RAICES)
Refugees International
Robert F. Kennedy Human Rights Center
Save the Children
Southern Border Communities Coalition (SBCC)
UndocuBlack Network (UBN)
United Stateless (USL)
Witness at the Border
Protection and Relief to Keep Immigrant Families Together

- **Continue** to support and promote a pathway to citizenship for all undocumented immigrants.
- **Exercise** discretion for individuals with meaningful ties to the United States and those who are stateless so that they are protected from removal and can maintain their residence.
- **Designate** countries for TPS or DED when conditions prevent them from being able to care for or protect their nationals.
- **Continue** to take all necessary steps to protect the Deferred Action for Childhood Arrivals (DACA) program for immigrant youth.
- **Allow** individuals to apply for cancellation of removal affirmatively by creating a joint process between USCIS and the Executive Office for Immigration Review (EOIR).
- **Continue** to pursue and expand a robust humanitarian parole program for Afghans, Central Americans, and Haitians in danger overseas and at the U.S. border.
- **Establish** a statelessness status determination. Extend parole or deferred departure to stateless individuals and do not place them in post-removal detention because they do not have a nationality and therefore cannot be removed.
- **End** family separation and prevent it in the future. End policies that separate children from their parents, adult family members, and trusted caregivers. Require agencies to consider the “best interests of the child” in every decision.
- **Reunify** all children separated from their families by the previous administration and formally end family detention.
- **Reduce** immigration backlogs by streamlining the adjudication process and terminating all policies and practices that are not required by law to address the millions of USCIS applications and petitions pending for years.
- **Process** immigrant visas up to the categorical limits on family-based, employment-based, and diversity visas in Fiscal Year (FY) 2022, and apply any unused visas to the next fiscal year.

Routing Out Discrimination and Anti-Blackness in the Immigration System

- **Immediately issue** invitations to Haitians qualified for the Haitian Family Reunification Parole Program.
- **Review** all immigration-related law, policy, practice, and processes to determine whether they disproportionately impact BIPOC communities, consistent with President Biden’s **executive order** on advancing racial equity.
- **Protect** and support an increase to the diversity visa program, withdraw Department of Justice’s appeal of Gomez v. Biden, and recapture the remaining approximately 40,000 unused diversity visas.

Rebuilding the U.S. Economy and Supporting Our Immigrant Essential Workers

- **Extend** prosecutorial discretion to essential immigrant workers.
- **Provide** prompt access to employment authorization documents for eligible applicants.
Reducing Harm By Limiting Interior Enforcement and Improving Due Process Protections in Removal Proceedings

- **Suspend** and phase out entirely the prosecution of migration-related offenses, including unlawful entry and charges against family members and humanitarians for providing assistance and lifesaving support to immigrants in border areas.
- **Formally end** the 287(g) and Secure Communities programs and phase out cooperation programs between federal immigration enforcement and local law enforcement, consistent with the conclusions of legal experts and immigration, civil rights, and human rights organizations.
- **Phase out** the use of detention and begin shutting down facilities in coordination with impacted families and local NGOs. End all contracts with private detention contractors, and place a moratorium on all expansion.
- **Commit** to providing legal counsel at no cost to every pro se individual and all vulnerable people, including unaccompanied children, people with a mental disability, and others who need legal support to ensure a fair hearing.
- **Review** the current roster of EOIR and Board of Immigration Appeals (BIA) judges to determine if they are sufficiently qualified and committed to fairness for immigrants.
- **Review** current immigration litigation and settlement negotiations before the federal circuit courts and EOIR to determine if Office of Immigration Litigation (OIL) and Immigration and Customs Enforcement (ICE) attorneys are taking positions consistent with the Biden administration. If not, direct OIL and ICE attorneys to settle cases favorably for immigrants or pursue administrative closure or termination of removal proceedings to keep families together.

Efforts and Challenges to Restoring the Asylum System and Humanitarian Protection at the Border

- **Terminate** the Title 42 expulsions policy and the Migrant Protection Protocols and permanently reopen the Customs and Border Protection (CBP) Ports of Entry to asylum seekers.
- **Resettle** 125,000 refugees in FY2022, consistent with the Presidential Determination on Refugee Admissions, and increase the Western Hemisphere regional allotment by adding at least 5,000 of the unassigned resettlement spots there.
- **Improve** asylum processes so that they are fair and timely.

Addressing the Root Causes of Migration and Promoting Regional Collaboration

- **Take** a whole-of-government approach to the region and pursue a hemispheric “Americas Migration Accord” built around a set of agreed-upon principles for regional responsibility sharing.
Immigrants and their families are deeply embedded in the fabric of our nation, and relief for the undocumented is long overdue, particularly given that thousands of undocumented immigrants have served on the front lines of a deadly pandemic. Currently, there are over 10 million undocumented immigrants in the country who make up our families, neighborhoods, communities, and workplaces. There are also 10.2 million U.S. citizens, including 6.1 million U.S. citizen children, who live with at least one undocumented family member. The average undocumented immigrant has lived in the United States for 16 years, and undocumented immigrants and their households pay $79.7 billion in federal taxes and $41 billion in state and local taxes on an annual basis. Undocumented immigrants are critical members our country and deserve to be protected.

Affirmative relief, be it through a pathway to citizenship or existing programs such as Temporary Protected Status (TPS), would provide lasting protections for undocumented individuals and their families. Protection from deportation and work permits would allow undocumented individuals to live freely without fear of separation from their families, while also enabling them to further contribute economically and socially to the country. In the absence of securing a pathway to citizenship through legislation in Congress, the administration has an opportunity—and an obligation—to use all the tools at its disposal to protect as many undocumented immigrants as possible.

Secured Temporary Protected Status for over 477,000 immigrants. The Biden administration designated Burma and Venezuela for Temporary Protected Status (TPS) and redesignated TPS for Haiti, Somalia, and Yemen, as conditions in these countries prevented the safe return of their nationals or residents consistent with the TPS statute due to ongoing armed conflict, earthquakes, pandemics, climate-related extreme weather, or other environmental disasters or extraordinary and temporary conditions. Currently, individuals from Haiti, El Salvador, Syria, Nepal, Honduras, Yemen, Somalia, Sudan, Nicaragua, Myanmar, South Sudan, and Venezuela are protected under TPS. However, there are still many countries that are...
eligible for designation under the statute that the administration has failed to act on, instead continuing to deport individuals to unsafe conditions. The Department of Homeland Security (DHS) should designate or redesignate TPS for all qualifying countries, including the Bahamas, Cameroon, El Salvador, Ethiopia, Guatemala, Guinea, Honduras, Hong Kong, Lebanon, Mauritania, Nepal, Nicaragua, Sierra Leone, South Sudan, and Sudan. In addition, the court cases over the termination of TPS for El Salvador, Haiti, Honduras, Nepal, and Nicaragua continue, though an injunction has prohibited their termination for the duration of the case. The administration should settle all outstanding cases attempting to terminate TPS designations.

Announced Deferred Enforced Departure (DED) for Liberians and Hong Kongers. The administration protected an additional estimated 5,600 Liberians and Hong Kong residents from removal through the issuance of DED. The DED designations came after China approved a national security law infringing on the rights of Hong Kong citizens to exercise their rights, and as Liberia continued to suffer conditions that prevented safe return.

Repealed Trump Policy Targeting the Parents and Sponsors of Children. The Biden administration officially rescinded a cruel Trump policy that directed the Department of Health and Human Services (HHS) Office of Refugee Resettlement to disclose the legal status of parents and potential sponsors of unaccompanied children to ICE before releasing children to their caretakers. ICE could then use the information provided by sponsors to arrest and place them in removal proceedings. This understandably resulted in parents and guardians not coming forward for their children because they were afraid of being deported.

Rescinded Trump’s Zero Tolerance Policy that Cruelly Separated Children from their Parents. In April 2018, the Trump administration directed U.S. attorneys’ offices along the southwest border to criminally prosecute all cases involving illegal entry—that is, entering the U.S. without authorization—referred to them by U.S. Customs and Border Protection (CBP). The Trump administration knew that children could not be put in jail with their parents under the zero tolerance policy and orchestrated the forced separation of children from their parents or legal guardians. There was no process to collect and retain data that would have allowed CBP, DHS, or the HHS to track children and parents so that they could be reunited at a later date. As a result, at least 3,951 children were separated from their families for months and years—some as young as a few months old. President Biden signed an executive order (EO) establishing an Interagency Task Force on the Reunification of Families to identify children who remain separated from their families and reunify them as swiftly as possible. The EO also directed the Task Force to issue recommendations for additional services and support for the reunited families, including behavioral health services with a focus on trauma-informed care. With the support of NGOs and pursuant to court orders, a total of 2,187 children have been reunited with their parents in the United States. The Task Force has reunited approximately 61 additional children as of November 2021 and is in the process of reunifying 206 more, though roughly 280 parents have still not been located. In addition, the administration has excluded parents with criminal records, including records obtained under zero tolerance. It is also important to note that the administration continues to prosecute migrants for unlawful entry, including asylum seekers—a policy that inevitably results in the separation of families outside of a formal “zero tolerance” program.

Walked Away from Settlement Negotiations with Formerly Separated Parents. Despite efforts to reunify families, the Biden administration broke off negotiations in December 2021 to pay monetary damages to families who were forcibly separated at the border during the Trump administration. The DOJ continues to argue in court that these families do not deserve compensation for the actions of U.S. officials, demonstrating an extremely troubling lack of accountability for the damage incurred. In addition to the rightful efforts to reunite parents with their children, the administration must make equal effort to hold itself accountable for trauma imparted by the hands of U.S. officials, which includes engaging in negotiations with the plaintiffs in the multiple lawsuits brought by forcibly separated parents.
Effort to Return Deported Military Veterans. In July 2021, DHS Secretary Mayorkas and Veterans Affairs Secretary McDonough announced steps to help deported veterans return to the United States, providing these individuals and their direct family members with a way to legally remain in the country. A new military resource center was also launched to help veterans and their families fill out necessary paperwork. Government attorneys are required to terminate or administratively close removal proceedings for veterans currently ensnared in them. While promising, few veterans have been reunited with their families thus far and progress toward making these returns a reality has been slow and halting. During the Trump administration, there was very little hope for veterans who had been removed or for those in removal proceedings to be protected, despite their service to the United States, and there was no effort to follow up with veterans after deportation. Even so, progress on this initiative has been slow: Of the estimated 1,000 military deportees, Secretary Mayorkas testified in November 2021 that they had thus far returned only five veterans to the U.S.

Task Force on New Americans to Promote Immigrant Inclusion and Naturalization. Through a February 2021 executive order on “Restoring Faith in Our Legal Immigration Systems and Strengthening Integration and Inclusion Efforts for New Americans,” President Biden directed the Domestic Policy Council (DPC) to convene a Task Force on New Americans. The Task Force promotes immigrant integration and inclusion and works alongside an Interagency Working Group tasked with developing a national strategy to promote naturalization. Focusing on the nine million lawful permanent residents in the United States who may be eligible to apply for citizenship, the administration’s government-wide strategy includes holding naturalization ceremonies at national parks, displaying promotional posters about naturalization at U.S. Postal Service facilities, and partnering with the U.S. Department of Veterans Affairs and veteran service organizations to find ways to educate service members and veterans on accessing citizenship.

Committed to Enhancing Protections for Stateless Individuals in the United States. In December 2021, DHS committed to pursuing initiatives to enhance recognition and protection of stateless individuals within the United States. As an initial step, DHS will adopt a definition of statelessness for immigration purposes and establish a process for making statelessness determinations. In coordination with the U.S. Department of State, DHS will also work
to better identify barriers faced by stateless persons and ways to protect these individuals. It is estimated that up to 218,000 people in the U.S. are stateless or at risk of statelessness. As it currently stands, there are no protections under U.S. law for these individuals. While some stateless individuals are able to obtain protection as asylees, refugees, trafficking victims, unaccompanied minors, or through Temporary Protected Status, many do not qualify for any of these legal immigration statuses. Thus stateless individuals are also at risk of prolonged immigration detention since no country will accept them for deportation.

Dismantled Trump’s Racist “Extreme Vetting” Policy. In an executive order to rebuild and enhance the refugee resettlement program, the Biden administration revoked racist Trump policies that presumed, without evidence, that every Black and Muslim refugee presented a threat to the United States, thereby needlessly subjecting refugees to years of vetting. Trump’s “extreme vetting” policy emboldened DHS agents to monitor personal social media accounts for the purpose of denying refugee resettlement and visas to eligible individuals overseas, and to find deportation grounds for individuals already here.

Challenges to Process Immigrant Visas and Clear Backlogs. The administration failed to process immigrant visas up to the numerical limits for FY 2021 and resolve the growing visa backlog. At the end of FY2021, there were over 3.5 million pending family- and employment-based visa applications. Only 13,741 family preference green cards and 6,642 diversity visas were issued in the first two quarters of FY 2021 out of the annual 226,000 family preference floor and the 50,000 diversity limit. Because of this, families have remained separated and the trust in existing pathways for green cards, which already are so limited, has become further eroded. The administration faced an uphill battle; the unfortunate effects of COVID-related shutdowns, limited staffing, full or partial closures of embassies and consulates abroad, and inherited Trump travel bans, all contributed to the growing backlog and posed challenges to process up to the annual limits. USCIS Director Jaddou recently acknowledged there is more work to do.

Currently, USCIS requires unnecessary evidence and testing that is not required by law or regulation and adds months and years to the adjudication of applications and petitions. Over many years, politics and bureaucratic processes have jammed up USCIS, and streamlining the adjudication process by terminating all policies and practices that are not required by law or regulation will be a key part of clearing backlogs. This should include automatic employment authorization document (EAD) extensions for individuals who are in a valid immigration status. This step alone could result in significantly fewer applications to adjudicate each year. In 2020, for example, USCIS processed 2 million applications, hundreds of thousands of which were for people already in status. Months would be cut off case processing times by requiring biometrics only upon the filing of a new petition or application, instead of requiring biometrics multiple times without any need. Currently, biometric appointments are being scheduled up to a year out, meaning many people with EADs have to quit their jobs while awaiting an EAD extension that may well be almost expired by the time it is received. USCIS is already taking this approach for the spouses and partners of H-1B and L-1 business visa recipients. The same approach should be implemented across all applications because it is not required nor needed to reach decisions.

Moving forward, the Department of Homeland Security and the Department of State should do everything in their power to process immigrant visas up to the categorical limits on family-based, employment-based, and diversity visas in FY 2022, as well as roll over any unused temporary visas into the next fiscal year.
The Biden administration inherited a broken, racist immigration system that continues to disproportionately discriminate against people of color, especially Black, indigenous, and brown migrants. The Trump administration implemented immigration policies based on racist immigrant tropes, anti-Black and anti-Asian discrimination, and Islamophobia, including the destruction of the infrastructure for refugee resettlement. However, the U.S. immigration system was built on the principle of exclusion from its beginning, and the Biden administration must do more than return to the status quo to route out discrimination. For example, Black immigrants continue to pay disproportionately more bond than other immigrants—as much as 54% percent more in the case of Haitians—and they suffer disproportionately higher deportation rates, with a 1700% increase in deportations against Haitians between 2016-2017 and mass expulsions and deportations continuing unabated. While the Biden administration has taken important actions to dismantle or roll back some of the egregious policies of the previous administration, much work remains to be done to ensure the immigration system is safe, just, and humane for BIPOC communities.

Mismanagement of the Haitian Refugee Crisis. A series of devastating economic, climate, and political crises—including the assassination of President Jovenel Moïse in July 2021 and deadly earthquakes—resulted in a Haitian refugee crisis at the U.S. southern border that continues into 2022. The Biden administration redesignated Haiti for TPS, a sound policy choice rooted in law, and restarted the Haitian Family Reunification Parole Program. Yet, it has not invited any Haitians to apply to this program—a necessary and urgent first step in the process.

Additionally, there has been no meaningful oversight, investigation, or accountability for the excessive use of force and dehumanization of Haitians attempting to apply for protection through Del Rio, Texas. While DHS Secretary Mayorkas promised lawmakers a swift investigation, months later no report exists.
and the administration has yet to announce any disciplinary action. Instead, the administration announced that the Office of the Inspector General will not be investigating the matter and referred it back to the CBP Office of Professional Responsibility (OPR). As CBP officers themselves, CBP’s OPR is unlikely to issue an accurate report given the results of past OPR investigations, the fact that OPR has no disciplinary power, and that egregious rights violations in the past have occurred without accountability.

From September 19, 2021, to January 31, 2022, the administration sent 152 deportation flights to Haiti, expelling approximately 15,800 asylum seekers—including pregnant women, children, and infants as young as nine days old. Since the beginning of the administration, there have been 189 removal flights to Haiti despite conditions so dangerous that they warranted a TPS redesignation in May 2021 and resulted in a Department of State Level 4 “Do Not Travel” Advisory that remains in effect. Many of these expulsions were carried out under Title 42, a policy that has disproportionately affected Black migrants, especially Haitian asylum seekers.

Repealed the Muslim and African Bans. On day one of his administration, President Biden began the process of repealing Trump’s racist and discriminatory Muslim and African bans. Trump’s orders had targeted and stranded hundreds of thousands of migrants and refugees from majority Muslim and Black countries, and suspended the Diversity Visa Program—still one of the only migration avenues available to Africans who want to enter the United States. Although the Biden administration withdrew Trump’s suspension of the diversity visa, the U.S. Department of State will not renew visa availability to applicants who were previously denied under the Trump administration’s discriminatory Muslim and African bans. This decision unjustly prevents the immigration of thousands of Africans and Muslims who gave up jobs and sold property with the expectation of immigrating to the United States and raises serious concerns about the administration’s commitment to the Diversity Visa Program overall. Although a federal judge ordered the U.S. State Department to reserve 9,095 diversity visas that were subjected to the immigration ban for future processing pending final resolution of the case, the administration announced that it will challenge that order. While this revocation was a needed first step, the administration should redress the harm done to applicants and direct the State Department to reconsider, reopen, and expedite all immigrant and non-immigrant visa applications subject to the bans that remain ungranted. The administration should withdraw the DOJ’s appeal of Gomez v. Biden so that eligible individuals can immigrate to the United States as the law provides and recapture the remaining approximately 40,000 unused diversity visas so that lottery winners over the last five years have an opportunity to apply.

R evoked the “Wealth” and “Health” Tests that Intentionally Precluded Immigration of Primarily Black and Brown People. The public charge rule is no longer in effect after the U.S. Supreme Court agreed to dismiss related litigation at the request of the Biden administration. This policy, which impacted over 4 million noncitizens, prevented family members from immigrating if they could not meet the Trump administration’s elevated demands when demonstrating they would not rely on public services at any point in their lives. The administration also revoked a Trump proclamation requiring family members to prove that they had health insurance before being reunited, even if they were traveling from countries that did not have health insurance available.

S wiftly Filed Lawsuit Against Texas Governor Greg Abbott’s Racist Executive Order. In response to Texas Governor Greg Abbott’s racist executive order that criminalized child welfare and humanitarian service providers who work with immigrants, the U.S. Department of Justice (DOJ) sued the state of Texas and was granted a preliminary injunction temporarily stopping the executive order, citing that it violates the U.S. Constitution. The executive order was part of a multi-million dollar initiative known as “Operation Lone Star,” designed by Gov. Abbott to criminally prosecute and rapidly deport immigrants. This operation also uses state law enforcement to enforce immigration law by arresting migrants for trespassing. As of July 2021, just 3% of the estimated 1,500 people arrested on misdemeanor trespassing charges have been convicted, and dozens of cases were ultimately dropped after local county attorneys failed to identify the allegedly trespassed properties. As of November 2021, roughly 70% of resolved cases
had been dropped. Most recently, Gov. Abbott deployed 10,000 state troopers and National Guard units to the Texas border as he continues to extend a steel curtain along the Texas-Mexico border. On January 13, 2022, a Texas county judge ruled the arrest of an Ecuadorian asylum seeker under Operation Lone Star to be unconstitutional as a violation of the Supremacy Clause. The Department of Justice should initiate a formal Title VI investigation into civil rights abuses endemic to Operation Lonestar and terminate federal funding for Texas agencies and counties engaged in the harmful and discriminatory operation. Such an investigation was requested by over fifty Texas lawmakers on January 27, 2022. As other states work to replicate or modify Gov. Abbot’s attacks on immigrant communities, the administration must continue to address discriminatory and retaliatory actions by states against immigrants, including children.

**Supported Applications for Liberian Adjustment to Permanent Residence and Deferral of Removal.** The FY 2020 National Defense Authorization Act included the “Liberian Refugee Immigration Fairness” (LRIF) provision, which provided certain Liberian refugees and their families the opportunity to apply for a green card. However, many eligible Liberians were unable to file in time because the Trump administration intentionally created obstacles and slowdowns. The Biden administration extended the filing period from one to two years, clarified what documents were necessary to demonstrate eligibility, and provided applicants with some flexibility when demonstrating their Liberian nationality. These changes were essential because, as refugees, many Liberians never had government-issued nationality documents or fled Liberia without them. President Biden also directed DHS to reinstate and extend Deferred Enforced Departure (DED) and employment authorization to Liberians through June 30, 2022, so that they would have time to file an LRIF application for permanent residence. This DED designation was estimated to benefit up to 3,600 Liberians who had resided and thrived in the United States for more than 20 years. Despite these changes, out of 10,000 Liberians who are likely eligible for LRIF, only 3,000 have filed—and most of these applications are still being processed by USCIS. The administration should immediately extend the eligibility period for filing and take further steps to support Liberians in the preparation and adjudication of their applications.

**Revoke a Trump Executive Order on “Recalcitrant Countries.”** President Biden revoked a Trump executive order that forced asylum seekers to return to countries known for committing widespread human rights abuses, including Fritrea, because the countries could not or would not cooperate with certain demands of the Trump administration. The Trump executive order also ordered DHS and the State Department not to issue visas to nationals of countries that the Trump administration deemed to be uncooperative on the return of nationals.
This policy disproportionately affected nationals of Asian countries, including India, Pakistan, China, and Vietnam, as well as Cuba.

End the “No Blank Space” Policy that Unfairly Denied Thousands of Asylum Applications and U Visa Petitions. The Biden administration withdrew the Trump-era policy that denied humanitarian protection to an individual if any part of their application or petition included a blank space, regardless of whether the blank space was material to the petition or even required. This policy led to the denial of over 60,000 asylum applications and U visa petitions during the final period of the Trump administration. Now, USCIS issues a Request for Evidence (RFE) and/or a Notice of Intent to Deny (NOID) if there are any deficiencies in applications or petitions, giving an individual the opportunity to respond to any concerns before a decision is issued. This was normal practice prior to the Trump administration. Pursuant to a decision in Yangaga v. USCIS, individuals whose applications were denied as a result of this policy may be able to recapture their original filing date, an important date for purposes of employment eligibility and applying for permanent residence.

Suspended Use of Biometrics for Spouses and Children of Green Card Holders. The Biden administration revoked a Trump policy that required the spouses and children of immigrants legally employed in the United States to re-submit their fingerprints every time they renewed their U.S. visas. This obstacle to visa renewals led to major delays in visa-processing and disproportionately impacted women, many of whom left stable jobs to join their spouses in the United States but were then prevented from doing so due to months-long biometric delays.

Eliminated the Investigations Threat Management Service (ITMS). After an internal review by the U.S. Department of Commerce’s (DOC) Office of the General Counsel, the DOC eliminated the 20-year-old Investigations and Threat Management Service (ITMS) because it used race and ethnicity-based investigations to target federal government departments with comparably high proportions of Asian Americans, ostensibly to counter attempts of espionage by individuals with Chinese ancestry. ITMS was also found to have engaged in serious misconduct, such as targeting and punishing former and current employees for challenging the lawfulness of the unit’s practices. Originally authorized to investigate a narrow set of situations after 9/11, ITMS abused its authority for years without repercussions.

Continued Use of the China Initiative. While the administration has made strides to eliminate several racist policies by the previous administration, the China Initiative persists. Originally a Trump-era policy ostensibly created to prevent cases of espionage from the Chinese government, the program has been and continues to be wielded with prejudice against Asian Americans and immigrants, particularly scientists and researchers of Chinese descent. While national security is of course a major facet of international policy, evidence continues to mount against the effectiveness of the program and its continued harm. The DOJ has yet to define what constitutes a case for the initiative, and the Massachusetts Institute of Technology (MIT) reports that the initiative has strayed from charges of espionage and is now applied to cases with nearly any connection to China. Over 50% of scientists surveyed of Chinese ancestry working in the United States fear they are under surveillance by the U.S. government, regardless of citizenship. To date, only a quarter of the roughly 150 individuals and organizations charged under the initiative have been convicted.
Immigrants make up one in five essential workers in the industries keeping the nation healthy, fed, and safe during an unprecedented global pandemic, including the healthcare, agriculture, and food service industries. Foreign-born workers represent over a quarter of all healthcare workers in New York, California, New Jersey, Florida, Nevada, and Maryland, and roughly a fifth of healthcare workers in Hawaii, Massachusetts, and Texas. Nearly one third of essential agriculture and farm jobs are held by foreign-born workers, over half of whom are estimated to be undocumented.

More than five million essential workers are undocumented. These individuals have contributed to our economy, taken on a disproportionate number of essential jobs during the pandemic, exposed themselves to dangerous work conditions, and filled critical roles in our labor market. The Biden administration is counting on immigrants to expand the economy and tackle an ongoing labor shortage, but this must come with continued support. In 2022 and beyond, the Biden administration needs to strengthen its commitment to protect and expand new opportunities for immigrant communities. The Biden administration should extend prosecutorial discretion to immigrant essential workers.

**Actions in Review**

Extension of the Visa Interview Waiver Program and Reopening of Consulates. The Trump administration took numerous actions to prevent the arrival of visa-approved individuals from overseas. This included closing consulate offices worldwide, which left millions of individuals stranded and unable to reunite with their families, and prevented highly-skilled workers from taking jobs that would strengthen U.S. competitiveness and the economy. The Biden administration strengthened U.S. diplomatic and political presence overseas by reopening dozens of consulates and extending the U.S. visa interview waiver policy until December 31, 2021. This allowed consular officers to approve a visa request without first interviewing an applicant, an action intended to decrease years-long consular backlogs.
Employment Authorization While Individuals Await Decisions on their Green Card Applications. USCIS updated its policy guidance in June 2021 to increase the duration of employment authorization for individuals seeking to adjust to permanent resident status. This time extension protects workers from losing work authorization due to bureaucratic processing delays. As designed under the Trump administration, employment authorization documents issued in one-year increments could take almost as long to be adjudicated, leading to lapses in work authorization, disruptions in business projects and plans, and an individual’s heightened vulnerability to arrest, detention, and deportation.

Fixed Time Limits Revoked for International Students. The Biden administration restored normal processing times for international student visas by revoking a Trump-era proposed rule that would have attached fixed time limits to certain student visas, even if the student needed more time to complete a degree. The Trump rule would have purposefully put international students at risk of overstaying their legal status, not by intent, but because they had not yet completed their studies or Optional Practical Training (OPT).

H-1B Salary Rule Withdrawn. After lawsuits and continued advocacy, the Biden administration withdrew the Trump-era rule that would have ended the H1-B lottery and awarded H-1B visas according to salary, which would have made it very difficult for recently graduating international students to obtain an H1-B visa. The administration should not issue any additional rules with a wage prioritization system that disadvantages recent graduates.

Religious Workers. Immigrant religious workers provide vital social and spiritual services to underserved American communities. Despite this essential work, especially during the COVID-19 pandemic, many foreign-born religious workers are forced to stop work or depart the United States due to USCIS delays and other problematic policies. To provide immediate relief to immigrant religious workers and the American communities they serve, USCIS should move the automatic extension for EAD applications from 180 days to a minimum of 240 days and take other key steps as can be found in the Catholic Legal Immigration Network’s policy brief.