

Exhibit E

Dominique Burkhardt

From: Dominique Burkhardt
Sent: Monday, June 7, 2021 11:34 AM
To: foia@hq.dhs.gov; ice-foia@dhs.gov; ice-foia@ice.dhs.gov
Subject: 2019-HQFO-01115 and 2020-ICFO-01444
Attachments: Assignment of FOIA Rights_Signed.pdf

Good Morning,

I am writing to follow up with both DHS and ICE regarding the status of Earthjustice's FOIA request to DHS, number 2019-HQFO-01115, which was transferred to ICE and assigned case number 2020-ICFO-01444. We submitted the FOIA request to DHS on July 26, 2019, and on August 9, 2019, DHS transferred the request to ICE. To date, we have not received a determination in response to our FOIA request from either agency. We are requesting a final determination as soon as possible. Please accept this email as a good-faith attempt to resolve this matter without litigation.

Separately, please be advised that per the attached document, the rights to this FOIA request were transferred from the nonprofit organization **WeCount!** to the nonprofit organization **American Friends Service Committee** in October 2020. This took place after the employee for WeCount! pursuing this FOIA request with Earthjustice changed her employment and moved to American Friends Service Committee. Earthjustice has at all times remained legal counsel in this matter, and all correspondence and responsive records to this FOIA request should be sent to me at dburkhardt@earthjustice.org.

Thank you for your attention to this matter.

Sincerely,

Dominique Burkhardt
Senior Attorney
Florida Regional Office
4500 Biscayne Blvd., Ste 201
Miami, FL 33137
(305) 440-5435
www.earthjustice.org



**Please consider the environment before printing.*

*The information contained in this email message may be privileged, confidential and protected from disclosure. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited. If you think that you have received this email message in error, please notify the sender by reply email and delete the message and any attachments.

U.S. Department of Defense
Department of the Air Force
SAF/AAII (FOIA)
1000 Air Force Pentagon
Washington, D.C. 20330-1000
usaf.pentagon.saf-aa.mbx.haf-foia-workflow@mail.mil

Administration for Children and Families
U.S. Department of Health and Human Services
330 C Street, S.W., 4th Floor
Washington D.C. 20201
foia@acf.hhs.gov

U.S. Department of Homeland Security
Immigration and Customs Enforcement
Freedom of Information Act Office
500 12th Street, S.W., Stop 5009
Washington, D.C. 20536
ice-foia@ice.dhs.gov

U.S. Department of Labor
Office of the Solicitor
Division of Management and Administrative Legal Services
200 Constitution Avenue, N.W., Room N-2420
Washington, D.C. 20210
foiarequest@dol.gov

**ASSIGNMENT OF FREEDOM OF INFORMATION ACT
RIGHTS AND INTERESTS**

COMES NOW WeCount! and hereby assigns to American Friends Service Committee (AFSC) all of its rights, benefits, and interests in and derived from the following Freedom of Information Act (FOIA) requests, effective immediately:

- FOIA Request No. 2019-04651-F to the United States Department of Defense / Department of the Air Force, dated July 26, 2019;
- FOIA Request No. 2019-01126-FOIA-OS to the Department of Health and Human Services, dated July 26, 2019; transferred to the Administration for Children and Families on July 29, 2019 with the same request number, and on June 29, 2020, given the Request No. 20-F-0202;
- FOIA Request No. 2019-HQFO-01115 to the Department of Homeland Security, dated July 26, 2019; transferred to Immigration and Customs Enforcement on August 9, 2019 and given the Request No. 2020-ICFO-01444;
- FOIA Request No. 882562 to the Department of Labor, dated July 26, 2019.

WeCount! transfers to AFSC the ability and right to pursue any administrative or legal options and methods at its disposal under the law in relation to these FOIA requests, and WeCount! surrenders any claims it may have with regard to these FOIA requests.

In support thereof, WeCount! and AFSC state the following:

1. WeCount! is a 501(c)(3) nonprofit organization whose mission and focus is to defend immigrants' rights and advocate for the immigrant community.
2. AFSC is also a 501(c)(3) nonprofit organization, and one of its key programmatic goals is to also defend immigrants' rights and advocate for the immigrant community.
3. Guadalupe de la Cruz was an employee of WeCount! at the time these FOIA requests were filed and was integral to the filing of said requests regarding the Homestead Detention Center as part of her immigrants' rights advocacy work with WeCount!.
4. Ms. de la Cruz is now an employee of AFSC, where she is continuing her advocacy work surrounding the Homestead Detention Center site with AFSC's Florida Immigrant Rights Program.

Legal representation in these FOIA requests remain the same. Earthjustice now represents AFSC, having previously represented WeCount!. All agency correspondence regarding these FOIA requests should be addressed to:

Earthjustice Florida Regional Office
 Dominique Burkhardt, Esq.
 4500 Biscayne Blvd., Ste. 201
 Miami, FL 33137
 (305) 440-5435
dburkhardt@earthjustice.org

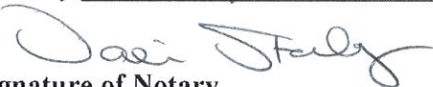
Nothing in this assignment of rights should be construed as assigning any other rights, benefits, or interests, whether contractual or personal, between WeCount! and AFSC.



OSCAR LONDOÑO
 Executive Director
 WeCount!
 201 N. Krome Ave., Ste. 240-260
 Homestead, FL 33030
 (305) 247-2202
oscar@we-count.org

STATE OF FLORIDA
COUNTY OF MIAMI-DADE.

This instrument was acknowledged before me by means of physical presence this 21st day of October, 2020, by Oscar Londoño, as Executive Director of WeCount!.


 Signature of Notary
 Name of Notary



Personally Known _____ OR Produced Identification
Type of Identification Produced FL DL

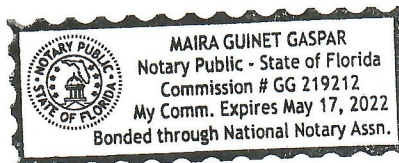


GUADALUPE DE LA CRUZ
Youth and Farmworker Program Director
American Friends Service Committee
12000 Biscayne Blvd., Suite 202
North Miami, FL 33181
(305) 600-5441
gdelacruz@afsc.org

STATE OF FLORIDA
COUNTY OF MIAMI-DADE.

This instrument was acknowledged before me by means of physical presence this 21 day of October, 2020, by Guadalupe De la Cruz, as Program Director of AFSC.

Signature of Notary Maira G
Name of Notary Maira Gaspar



Personally Known OR Produced Identification
Type of Identification Produced _____