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2 THE CENTER FOR INVESTIGATIVE REPORTING  
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8 Attorney for Plaintiffs

9  
10 **UNITED STATES DISTRICT COURT**  
11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**

13 THE CENTER FOR INVESTIGATIVE ) Case No. \_\_\_\_\_  
14 REPORTING and IKE SRISKANDARAJAH, )  
15 )  
16 Plaintiffs, )  
17 )  
18 v. )  
19 )  
20 U.S. DEPARTMENT OF HOMELAND )  
21 SECURITY, )  
22 )  
23 Defendant. )  
24 \_\_\_\_\_

25 I, D. Victoria Baranetsky, declare:

26 1. I am an attorney of record for the Plaintiffs in this matter and a member in good  
27 standing of the California State Bar, and I am admitted to practice before this Court. I have personal  
28 knowledge of the matters stated in this declaration. If called upon to do so, I am competent to testify  
to all matters set forth herein.

2. I am General Counsel at The Center for Investigative Reporting, which is a nonprofit  
established under the laws of California with its principal place of business in Emeryville, CA.

3. Attached hereto as Exhibit A is a true and correct copy of the following web page:  
Immigration and Customs Enforcement (“ICE”), *Human Rights Violators & War Crimes Center*,  
<https://www.ice.gov/features/human-rights-violators-and-war-crimes>.

4. Attached hereto as Exhibit B is a true and correct copy of the FOIA request submitted

1 by Plaintiffs to ICE on September 13, 2021, seeking disclosure of records related to the Human  
2 Rights Violators & War Crimes Center (hereinafter “HRVWCC”)

3 5. Attached hereto as Exhibit C is a true and correct copy of an email sent by Plaintiffs  
4 to ICE on September 28, 2021.

5 6. Attached hereto as Exhibit D are a true and correct copies of emails between Plaintiffs  
6 and the ICE Office of Public Affairs beginning on November 30, 2021.

7 7. Attached hereto as Exhibit E are a true and correct copies of additional emails between  
8 Plaintiffs and the ICE Office of Public Affairs on December 2, 2021.

9 8. I declare under penalty of perjury of the laws of the State of California that the  
10 foregoing is true and correct to the best of my knowledge and belief.

11  
12 Executed December 14, 2021 in Emeryville, California.

13  
14 s/ D. Victoria Baranetsky  
15 D. Victoria Baranetsky  
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