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16 *Attorneys for Plaintiffs*

17 **UNITED STATES DISTRICT COURT**
18 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

19 AMERICAN CIVIL LIBERTIES }
20 UNION FOUNDATION AND }
21 AMERICAN CIVIL LIBERTIES }
22 UNION FOUNDATION OF }
SOUTHERN CALIFORNIA, }
Plaintiffs, }

23 v. }

24 }
25 UNITED STATES }
26 IMMIGRATION AND }
CUSTOMS ENFORCEMENT, }
27 Defendant. }

CASE NO.: 2:22-CV-01291
**COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF UNDER
THE FREEDOM OF INFORMATION
ACT, 5 U.S.C. § 552 et seq.**

INTRODUCTION

1
2 1. Plaintiffs American Civil Liberties Union Foundation and American
3 Civil Liberties Union Foundation of Southern California (together, the “ACLU”)
4 bring this action under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552,
5 against the United States Department of Homeland Security, Immigration and
6 Customs Enforcement (“ICE”) to compel ICE to produce records related to one of
7 its alternatives to detention programs, the Intensive Supervision Appearance
8 Program (“ISAP”).

9 2. ICE’s activities with respect to the surveillance and monitoring of
10 immigrant communities are a matter of great concern to the public. Thousands of
11 noncitizens are placed in ISAP while their immigration cases are pending in court
12 or while the government seeks to effectuate their deportation. As part of ISAP,
13 noncitizens are subjected to intrusive monitoring and burdensome requirements,
14 including the use of ankle monitors with GPS tracking, smart phone applications
15 with facial recognition and location monitoring, home confinement, office check-
16 ins, and unannounced house visits.

17 3. Noncitizens and their advocates have raised serious concerns with the
18 intrusion that they are required to live with day-to-day and the impact that constant
19 surveillance has not only on their privacy and physical and mental wellbeing, but
20 also that of their families and communities.

21 4. The harms imposed by these programs are exacerbated by the length
22 of time that noncitizens are subjected to ISAP and the lack of transparency about
23 de-escalation procedures. Government statistics reveal that, on average,
24 noncitizens are subjected to ISAP for approximately 837.8 days. Many advocates
25 and their clients express a deep frustration with how the program is run and how
26 difficult it is to be de-escalated, even after an individual has complied with their
27 supervision requirements and made multiple requests to ICE officers.

28 5. Plaintiffs submitted the FOIA requests at issue here, along with

1 requests for expedited processing and fee waiver, on January 6, 2022. To date, they
2 have received no response from Defendant, either acknowledging receipt of the
3 requests or responding with the requested records, in clear violation of FOIA.
4 Plaintiffs bring this action to vindicate the public right to know and FOIA's
5 promise of transparency about ICE's intrusive surveillance programs.

6 **JURISDICTION AND VENUE**

7 6. This Court has subject matter jurisdiction over this action and
8 personal jurisdiction over the parties pursuant to 5 U.S.C. § 552(a)(4)(B);
9 § 552(a)(6)(E)(iii). This Court also has jurisdiction under 28 U.S.C. § 1331 and 5
10 U.S.C. §§ 701-06.

11 7. Venue lies in this district under 5 U.S.C. § 552(a)(4)(B).

12 **PARTIES**

13 8. Plaintiff American Civil Liberties Union Foundation is a national,
14 nonprofit, non-partisan organization dedicated to defending fundamental rights
15 outlined in the United States Constitution and the Bill of Rights. Its work centers
16 on protecting free speech and privacy rights, and ensuring that everyone, especially
17 the most vulnerable, are afforded equal protection and due process. As part of these
18 efforts, it engages in advocacy, litigation, and public education.

19 9. Plaintiff ACLU of Southern California is the Southern California
20 affiliate of the national ACLU. The ACLU of Southern California covers Los
21 Angeles, Kern, Orange, Riverside, San Bernardino, San Luis Obispo, Santa
22 Barbara and Ventura counties. The affiliate works on a variety of issues affecting
23 marginalized communities in the region, such as surveillance and over-policing,
24 and has a long-standing commitment to the advancement of immigrants' rights. As
25 part of these efforts, it engages in advocacy, litigation, and public education.

26 10. Plaintiffs are also committed to advocating for transparency and
27 accountability at each level of government and empowering the public via the
28 dissemination of information. The ACLU routinely publishes Know Your Rights

1 documents, analyses of changes in the law and government activity, and in-depth
2 reports covering key issue areas. Plaintiffs are able to share these resources with
3 their national network of affiliates, robust membership, and the public at-large via
4 their website, social media sites, weekly email and text alerts, and news media
5 coverage.

6 11. Defendant ICE is a component of the Department of Homeland
7 Security and an agency within the meaning of 5 U.S.C. § 552(f)(1). ICE is
8 responsible for the enforcement of the immigration laws and has two primary law
9 enforcement sections, Homeland Security Investigations (HSI) and Enforcement
10 and Removal Operations (ERO).

11 **FACTUAL BACKGROUND**

12 12. Since its inception in 2004, ICE's Alternatives to Detention ("ATD")
13 program has rapidly expanded. As of January 2022, the program has approximately
14 164,391 active participants.¹ This Administration has vowed to further expand the
15 size and reach of these surveillance programs.² The program's rapid growth and its
16 impact on the immigrant community have raised serious concerns about how the
17 program operates and what de-escalation procedures are in place. While some
18 iteration of an ATD program has been in place for almost two decades, there is no
19 transparency or clear public guidance as to why individuals are placed in the
20 program, what type of case management and supervision is appropriate, and what
21 procedures allow for successful de-escalation of supervision requirements. The
22 opacity of this program has left noncitizens and their representatives confused and

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24 ¹ See TRAC Immigration, *Alternatives to Detention (ATD)*,
https://trac.syr.edu/immigration/detentionstats/atd_pop_table.html (last visited Feb.
25 24, 2022).

26 ² See, e.g., Stef W. Knight, *Scoop: Biden reinvents migrant detention*, Axios (Feb.
27 8, 2022), <https://www.axios.com/scoop-biden-reinvents-migrant-detention-6a41d0a7-8ac2-4038-86d8-cf1e46228710.html>; Ted Hesson and Mica Rosenberg,
28 *Private prison company to test U.S. house arrest program for immigrants*, Reuters
(Feb. 16, 2022), <https://www.reuters.com/world/us/private-prison-company-test-us-house-arrest-program-immigrants-2022-02-16>.

1 frustrated, as they try to advocate for less intrusive conditions for release.

2 ISAP

3 13. ICE's largest alternatives to detention program, ISAP, is overseen by
4 Enforcement and Removal Operations ("ERO"). ERO is responsible for managing
5 immigration prisons and the release of individuals into the interior of the United
6 States while their immigration proceedings are pending. ERO officers determine
7 case management and supervision methods, while case management and
8 technology are administered by B.I., Incorporated, a GEO Group subsidiary.³ Case
9 management includes a combination of face-to-face and telephonic meetings,
10 unannounced house visits, scheduled office visits, and court and meeting alerts.⁴
11 Technology services range from ankle monitors that employ GPS location
12 tracking, smart phone applications that utilize both facial recognition and GPS
13 location monitoring (SmartLINK), and telephonic reporting systems (TR).⁵

14 Impact on the Community

15 14. While ISAP provides a pathway out of immigration prisons for some
16 individuals, it still imposes significant restrictions on noncitizens who are
17 subjected to the program. Ankle monitors, for example, impose serious
18 psychological and physical burdens on noncitizens, including the stigma and
19 shame of constantly wearing a piece of plastic attached to their ankles.⁶ The
20 monitors are bulky and painful, and can interfere with someone's ability to work,⁷

21 ³ Audrey Singer, Cong. Research Serv., R45804, *Immigration: Alternatives to*
22 *Detention Programs*, at 7 (2019), <https://sgp.fas.org/crs/homesec/R45804.pdf>.

23 ⁴ *See id.*

24 ⁵ *See* TRAC Immigration, *ICE Alternatives to Detention Programs*,
https://trac.syr.edu/immigration/detentionstats/about_atd.html (last visited Feb. 22,
2022).

25 ⁶ *See* Human Rights Watch, *Dismantling Detention: International Alternatives to*
26 *Detaining Immigrants*, at 4 (2021),
https://www.hrw.org/sites/default/files/media_2021/11/global_altdetention1021_wb.pdf.

27 ⁷ Certain noncitizens may qualify for employment authorization while in
28 immigration proceedings and may apply to U.S. Citizenship and Immigration

(cont'd)

1 travel, and sleep. In addition to these burdens, noncitizens are often penalized
2 when, through no fault of their own, the technology malfunctions, such as when a
3 battery dies or the GPS tracking fails, potentially causing what are colloquially
4 referred to as “strikes.”⁸ Individuals with too many strikes suffer the risk of being
5 re-detained.⁹ These circumstances are further complicated by the fact that there is
6 no transparency as to what factors determine whether someone’s ankle monitor
7 should be removed.¹⁰

8 15. Ankle monitors and other location-tracking tools also raise serious
9 concerns regarding the privacy rights of noncitizens and their communities. By
10 closely monitoring an individual’s whereabouts, ICE is not only able to establish
11 patterns of behavior for the individual wearing or carrying the tracking device, but
12 also the behavior of their families, friends, and close networks.¹¹ As a result, these
13 surveillance methods end up targeting communities of color that have historically
14 been impacted by over-policing and over-criminalization.¹²

15 16. Over the last few years, ICE has also increased its use of SmartLINK,
16 a phone application which requires noncitizens to check in through the application
17 by taking pictures of themselves.¹³ This tool also raises several data privacy
18 concerns, including the capturing of real-time location data and the use of facial
19 recognition and verification technologies.¹⁴

20 17. In addition to the harms imposed by ISAP’s surveillance tools, the
21 program’s onerous reporting obligations significantly interfere with noncitizens’

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23 Services (USCIS) for an Employment Authorization Document (EAD). Examples
24 include individuals who have been granted immigration relief or who still have
25 pending applications for immigration relief, such as Cancellation of Removal,
26 Asylum and Withholding of Removal, and U Nonimmigrant Status.

25 ⁸ See Human Rights Watch, *supra* note 6.

26 ⁹ See *id.*

27 ¹⁰ See *id.*

28 ¹¹ See *id.*

¹² See *id.*

¹³ See *id.* at 5.

¹⁴ See *id.*

1 ability to function in society and fulfill financial and parental responsibilities.
2 Noncitizens are often required to travel long distances and endure hours-long
3 delays as part of ISAP's overly restrictive check-in requirements.¹⁵ Often,
4 noncitizens in the program are required to check in with ICE in addition to its
5 subcontractors.¹⁶ These reporting requirements make it difficult for program
6 participants to find regular employment and meet necessary family and community
7 obligations.¹⁷ Further, the program lacks any meaningful case management
8 structure. Noncitizens in the program are not provided with an orientation as to
9 what to expect with their immigration cases and report an overarching lack of
10 consistency at check-ins, flagging having to meet with different officers every time
11 they report for a check-in and, as a result, rules being applied inconsistently.¹⁸ The
12 lack of stability and transparency in ISAP creates uncertainty for program
13 participants and makes the program susceptible to errors.

14 18. The burdens imposed on noncitizens by the constant surveillance and
15 onerous reporting requirements are further compounded by the fact that
16 noncitizens are routinely subject to ISAP for prolonged periods of time. On
17 average, noncitizens are placed in the program for over 837 days.¹⁹ The length of
18 time that noncitizens are subjected to constant disruption in their everyday lives,
19 including unannounced home visits and invasive surveillance, takes a massive toll

21 ¹⁵ See David Secor, et al., *A Better Way: Community-Based Programming as an*
22 *Alternative to Immigrant Incarceration*, National Immigrant Justice Center, at 10
(2019), <https://immigrantjustice.org/BetterWay>.

23 ¹⁶ See Rutgers School of Law-Newark Immigrant Rights Clinic and American
24 Friends Service Committee, *A Report Examining the Current Use of Alternatives*
25 *to Detention*, at 1 (2012), [https://www.afsc.org/sites/default/files/documents/Freed-](https://www.afsc.org/sites/default/files/documents/Freed-but-not-Free.pdf)
[but-not-Free.pdf](https://www.afsc.org/sites/default/files/documents/Freed-but-not-Free.pdf).

26 ¹⁷ See Secor, *supra* note 15.

27 ¹⁸ See *id.*

28 ¹⁹ Just Futures Law and Mijente, *ICE Digital Prisons: The Expansion of Mass*
Surveillance as ICE's Alternative to Detention, at 5 (2021),
[https://www.flipsnack.com/justfutures/ice-digital-prisons-1u8w3fnd1j/download-](https://www.flipsnack.com/justfutures/ice-digital-prisons-1u8w3fnd1j/download-pdf.html)
[pdf.html](https://www.flipsnack.com/justfutures/ice-digital-prisons-1u8w3fnd1j/download-pdf.html).

1 on their physical and emotional wellbeing.²⁰ ISAP participants have reported
2 confusion as to why they are required to comply with such burdensome obligations
3 for such a long period of time, and are often told that whether or not someone's
4 requirements are successfully de-escalated depends entirely on the ICE officer in
5 charge of their case.²¹

6 19. The creation of ISAP has not decreased the incarceration of
7 noncitizens. While the budget for ISAP has increased from \$28 million to \$440
8 million, the budget for detention has also increased from \$1 billion to \$2.8 billion
9 from 2006 to 2021.²² Further, the program has increased the number of individuals
10 subject to ICE's supervision than would otherwise be without the program,
11 including asylum seekers who would have previously been released from detention
12 without such intrusive forms of supervision.²³

13 Alban Nganbou

14 20. The harms of long-term ATD enrollment are illustrated by the case of
15 Alban Nganbou. In November 2019, Mr. Nganbou presented himself at the San
16 Ysidro Port of Entry requesting protection from persecution he suffered in his
17 home country of Cameroon. After passing his credible fear interview, he was
18 released on a \$1,500 bond and enrolled in ISAP in January 2020. As part of his
19 participation in ISAP, Mr. Nganbou was placed on a GPS ankle monitor.

20 21. From January 2020 to October 21, 2021, Mr. Nganbou remained at
21 the same level of supervision. This was the case, despite Mr. Nganbou's full
22 compliance with the program and multiple requests that ICE de-escalate his
23 conditions of supervision and remove his GPS ankle monitor.

24 22. The first request to de-escalate supervision requirements was sent on
25 February 26, 2021, after over a year on the ankle monitor. Mr. Nganbou sent a

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²⁰ *See id.*

27 ²¹ *See Secor, supra* note 15, at 11.

28 ²² *See Just Futures Law, supra* note 19, at 4.

²³ *See id.*

1 request directly to his ISAP officer, including letters from his medical doctor and
2 his therapist explaining the severe mental distress that the GPS monitor was
3 causing him. That request went unanswered.

4 23. The second request was sent on May 17, 2021, this time to Mr.
5 Nganbou's ICE officer, again asking that his GPS monitor be removed. This
6 request also included letters from his medical doctor and therapist, and also
7 referenced the new ICE enforcement priorities adopted by the Biden
8 Administration in January 20 and February 18, 2021, explaining that Mr. Nganbou
9 did not qualify as a priority under that new guidance. This second request also
10 went unanswered.

11 24. It was not until Mr. Nganbou and his counsel sent a third de-
12 escalation request, on October 18, 2021, that ICE finally agreed to remove the GPS
13 ankle monitor.

14 25. Shortly thereafter, on October 21, 2021, Mr. Nganbou was called to
15 the ISAP office and had his ankle monitor removed and his conditions of
16 supervision de-escalated to office visits every 12 months.

17 26. In total, Mr. Nganbou spent nearly 20 months on the GPS ankle
18 monitor and other onerous supervision conditions. Despite repeated requests, ICE
19 has provided no explanation as to why Mr. Nganbou was subjected to such
20 intrusive monitoring for such a long period of time or why his prior requests for
21 de-escalation were denied.

22 **ACLU's Requests**

23 27. On January 6, 2022, Plaintiffs submitted two FOIA requests
24 pertaining to ICE's practices and policies with respect to ISAP.

25 28. The first request corresponds to Mr. Nganbou's case. The request
26 sought "all documents, memoranda, reports, worksheets, emails or other
27 communications, and electronic database information, including location tracking
28 information," related to the participation of Mr. Nganbou's participation in ISAP.

1 A copy of this request is attached as Exhibit 1.

2 29. The request also asked for documents at multiple stages of Mr.
3 Nganbou’s involvement with ISAP, including during ICE’s consideration and
4 decision to enroll Mr. Nganbou in ISAP, after his enrollment at ISAP and while he
5 remained in the program, and after having received and considered requests to de-
6 escalate the ISAP conditions imposed on Mr. Nganbou, including the requests for
7 de-escalation on February 26, 2021, May 17, 2021, and October 18, 2021.

8 30. The second FOIA request pertained to the general policies and
9 guidance related to the supervision and de-escalation of conditions of supervision
10 for individuals subject to ISAP. A copy of this request is attached as Exhibit 2.

11 31. More specifically, Plaintiffs asked for “policies, guidance,
12 instructions, memoranda, legal opinions, reports, studies, procedures, manuals,
13 sample forms or checklists, templates, worksheets, training materials, emails,
14 and/or other communications from the last ten years” pertaining to the supervision
15 and case management of ISAP participants under the jurisdictions of all ICE Field
16 Offices, de-escalation of conditions of supervision, and the collection,
17 maintenance, retention, use, and dissemination of location data disclosed to ICE
18 and its contractor B.I., Incorporated. *See* Exhibit 2.

19 32. Both FOIA requests asked for a fee waiver pursuant to 5 U.S.C.
20 § 552(a)(4)(A)(iii) and 6 C.F.R. § 5.11(k) on the grounds that disclosure is in the
21 public interest, and likely to contribute significantly to the public’s understanding
22 of the operations and activities of the government, and disclosure is not primarily
23 in the commercial interests of Plaintiffs.

24 33. The requests also asked for a fee waiver pursuant to 5 U.S.C.
25 § 552(a)(4)(A)(ii) on the grounds that Plaintiffs meet the statutory and regulatory
26 definitions of “representative[s] of the news media,” as organizations that obtain,
27 process, and publish information about government activity to the press and the
28 public, and the records are not sought for a commercial purpose.

1 period, a FOIA requester is deemed to have exhausted their administrative
2 remedies, and can proceed directly to the district court where the agency must
3 show “exceptional circumstances” justifying its untimeliness and due diligence in
4 remedying the violation. 5 U.S.C. § 552(a)(6)(C); *see Hajro v. U.S. Citizenship &*
5 *Immigr. Servs.*, 811 F.3d 1086, 1092 (9th Cir. 2016).

6 41. A district court has jurisdiction to enjoin the agency from withholding
7 records and to order production of records that are subject to disclosure. 5 U.S.C.
8 § 552(a)(4)(B).

9 42. A FOIA requester can seek a waiver of search and review fees on the
10 ground that the disclosure of the information is in the public interest because it is
11 likely to contribute significantly to the public’s understanding of the operations and
12 activities of the government, and is not primarily in the commercial interest of the
13 requester. *See* 5 U.S.C. § 552(a)(4)(A)(iii).

14 43. A FOIA requester can also seek a waiver of search and review fees on
15 the grounds that the requester is a “representative of the news media,” and the
16 records are not sought for a commercial purpose. *See* 5 U.S.C. § 552(a)(4)(A)(ii).
17 A representative of the news media is “any person or entity that gathers
18 information of potential interest to a segment of the public, uses its editorial skills
19 to turn the raw materials into a distinct work, and distributes that work to an
20 audience.” *Id.*

21 44. FOIA also allows for requesters to ask for expedited processing of
22 their request for records if they can demonstrate a compelling need. 5 U.S.C.
23 §552(a)(6)(E)(i). The term “compelling need” applies to requesters who are
24 primarily engaged in disseminating information and possess the urgency to inform
25 the public concerning actual or alleged Federal government activity. 5 U.S.C.
26 § 552(a)(6)(E)(v)(II).

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CAUSES OF ACTION

First Cause of Action

Failure To Timely Respond To The Requests

45. Plaintiffs incorporate by reference the above paragraphs as if fully set forth herein.

46. Plaintiffs properly submitted FOIA requests on January 6, 2022.

47. Under 5 U.S.C. § 552(a)(6)(A)(i), ICE had 20 working days after the receipt of the ACLU’s requests to make a determination and provide notice of such determination.

48. That time expired on Friday, February 4, 2022.

49. As of February 24, 2022, ICE has not acknowledged or responded to the ACLU’s request for records.

50. Defendant’s failure to provide a response within the statutory time period is a violation of 5 U.S.C. § 552(a)(6)(A) and the agency’s corresponding regulations.

Second Cause Of Action

Failure To Make A Reasonable Effort To Search For And Promptly Release Records

51. Plaintiffs incorporate by reference the above paragraphs as if fully set forth herein.

52. Under information and belief, ICE has in its possession a number of responsive documents, including those specifically identified in Plaintiffs’ requests, that it failed to produce.

53. ICE failed to respond to Plaintiffs’ requests for documents and failed to provide any justification for doing so.

54. As such, ICE’s failure to search adequately and promptly produce the materials requested by Plaintiffs violate 5 U.S.C. § 552(a)(3)(A)-(D) and its corresponding regulations.

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Third Cause Of Action

Failure To Grant Plaintiffs’ Requests For A Fee Waiver

55. Plaintiffs incorporate by reference the above paragraphs as if fully set forth herein.

56. Defendant failed to grant plaintiffs request for a fee waiver in violation of 5 U.S.C. § 552(a)(4)(A)(iii) and the agency’s corresponding regulations.

Fourth Cause Of Action

Failure To Grant Plaintiffs’ Requests For A Limitation Of Fees

57. Plaintiffs incorporate by reference the above paragraphs as if fully set forth herein.

58. Defendant failed to grant plaintiffs request for a fee waiver in violation of 5 U.S.C. § 552(a)(4)(A)(ii) and the agency’s corresponding regulations.

Fifth Cause Of Action

Failure To Grant Requests For Expedited Processing

59. Plaintiffs incorporate by reference the above paragraphs as if fully set forth herein.

60. Defendant failed to make a determination of Plaintiffs’ expedited processing requests and failed to provide notice of that determination within 10 days of the requests in violation of 5 U.S.C. § 552(a)(6)(E)(ii)(I) and the agency’s corresponding regulations.

61. Defendant also failed to grant Plaintiffs’ requests for expedited processing in violation of 5 U.S.C. § 552(a)(6)(E)(i) and the agency’s corresponding regulations.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that the Court:

A. Declare that Defendant’s failure to respond and produce the requested

- 1 records is unlawful;
- 2 B. Order Defendant to promptly conduct a thorough search for all
- 3 responsive records and release them;
- 4 C. Order Defendant to grant Plaintiffs a fee waiver in connection with
- 5 the Requests;
- 6 D. Award Plaintiffs their costs and reasonable attorneys' fees pursuant to
- 7 5 U.S.C. § 552(a)(4)(E); and
- 8 E. Grant all other appropriate relief.
- 9

10 Respectfully submitted,

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12 Dated: February 24, 2022

13 /s/ Liga Chia
14 LIGA CHIA
15 ACLU Foundation of Southern California
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Counsel for Plaintiffs