

Exhibit D

LEGAL AID
JUSTICE CENTER

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June 3, 2015

By Certified Mail, RRR

U.S. Immigration and Customs Enforcement
Freedom of Information Act Office
500 12th Street SW, Stop 5009
Washington, D.C. 20536-5009

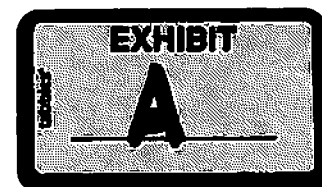
Dear Sir or Madam:

This is a request under the Freedom of Information Act (5 U.S.C. § 552, as amended). I am investigating what I fear may be a massive fraud being perpetrated against the immigrant community in Virginia by an entity that goes by various names, including but not limited to "Libre by Nexus." As part of my investigation, I request copies of certain documents/records. You may limit your search/production to documents created or revised from January 1, 2011 through the date of fulfilling the request.

Please produce copies of the following documents, or make them available for inspection, within the timelines mandated by the FOIA:

1. Any record describing or concerning, in whole or in part, ICE's protocols, practices, procedures, and/or general policies when a bond obligor requests that ICE voluntarily cancel a bond for a principal (alien) for whom the obligor has previously posted a bond, and/or re-detain the principal (alien), prior to the conclusion of removal proceedings.
2. Any record describing or concerning any situation in which a bond obligor requested that ICE voluntarily cancel a bond for a principal (alien) for whom the obligor had previously posted a bond, and/or re-detain the principal (alien), prior to the conclusion of removal proceedings.
3. Any record describing or concerning any situation in which ICE acceded to a bond obligor's request that ICE voluntarily cancel a bond for a principal (alien) for whom the obligor had previously posted a bond, and/or re-detain the principal (alien), prior to the conclusion of removal proceedings.
4. Any record of any communication, including but not limited to e-mails, letters, or notes of telephone or in-person conversations, with any of the following individuals or entities; and/or any records about or relating to any agreement between ICE and any of the following entities:
 - a. Libre by Nexus
 - b. Nexus Virginia
 - c. Nexus Services
 - d. Nexus Ministries
 - e. Nexus Programs

PLEASE NOTE OUR NEW ADDRESS
6066 Leesburg Pike, Suite 520, Falls Church, Va. 22041
(703) 778-3450 / Fax (703) 778-3454 <http://www.justice4all.org>



- f. Project Nexus
- g. A to Z Bail Bonds
- h. Nexus Caridades
- i. First Christian Church Universalist (Harrisonburg, Va.)
- j. Eduardo Moca
- k. Richard Moore
- l. Rick Nagel
- m. Rev. Mike Donovan

For purposes of requests #2#-3 only, you may restrict your search and production to cases arising out of the Washington Field Office only.

For purposes of all requests, you may omit from your response any Forms I-312, I-333, I-352, I-392, or I-395.

For purposes of request #4, I recommend you focus your search on the following locations: ICE headquarters; the Washington Field Office; any ICE offices located in Virginia.

To the extent any of the above-requested documents contain personally identifying information of any alien or obligor who is a natural person, you may redact the personally identifying information of that alien or any obligor who is a natural person, and produce the remainder of the document.

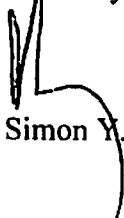
In order to help determine my status for purposes of determining the applicability of any fees, you should know that I am investigating potentially fraudulent threats made by Libre by Nexus Inc., to cancel bonds it has already posted on behalf of aliens. The Legal Aid Justice Center is dedicated to assisting the immigrant population in Virginia on legal matters and informing them in government practices, procedures, and policies. This request would help the immigrant population by helping them make informed decisions on whether or not to enter into a contract with Libre by Nexus, Inc., based on ICE's practices and policies towards such agencies in dealing with bond cancellation. This request will also protect immigrants from future fraud. Therefore, I request a waiver of all fees for this request.

In the event a fee waiver is denied, this letter authorizes costs of up to \$25.00. Please contact me prior to proceeding if costs will exceed that amount.

Please feel free to contact me directly if you have any questions, or if I can be of assistance in helping determine search terms, etc.

Thank you.

Sincerely,



Simon Y. Sandoval-Moshenberg