

Exhibit F

November 25, 2020

Immigration and Customs Enforcement
Freedom of Information Act Office
500 12th Street, S.W., Stop 52009
Washington, D.C. 20536-5009

Immigration and Customs Enforcement
Debt Management Center
Attention: Bond Unit
P.O. Box 5000
Williston, VT 05495-5000

Re: Freedom of Information Request

To Whom It May Concern:

Refugee and Immigrant Center for Education and Legal Services (“RAICES”), National Bail Fund Network, Keep Tucson Together, Prairieland Freedoms Fund, LGBTQ Freedom Fund, NorCal Resist ICE Bond Fund, Minnesota Freedom Fund, Emergency Release Fund, Brooklyn Community Bail Fund, New Sanctuary Coalition, Fair Fight Bond Fund, Beyond Bond and Legal Defense Fund, Immigrant Family Defense Fund, Haitian Immigrant Bail Assistance Project, Connecticut Bail Fund, Orange County Justice Fund, Arriba Las Vegas Worker Center New Hampshire Conference United Church of Christ Immigrant and Refugee Support Group, Chicago Community Bond Fund, Kent County I-Bond Fund, Black Immigrants Bail Fund, Border Angels Familias Reunidas Bond Program, Etowah Freedom Fund, Immigrant Freedom Fund of Colorado, Vermont Freedom Bail Fund, and Georgia Immigration Bond Fund (“Requesters”) submit this Freedom of Information Act (“FOIA”) request (“Request”) to U.S. Immigration and Customs Enforcement (“ICE” or the “Agency”). The twenty-six Requesters seek records relating to the policies and procedures regarding the payment, revocation, cancellation, and refunding of immigration bonds, and corresponding numerical data. The Request is made pursuant to 5 U.S.C. § 552 *et seq.*, and its relevant implementing regulations, 6 C.F.R. § 5 *et seq.*

BACKGROUND

Both ICE Enforcement and Removal Operations (“ICE ERO”) and Immigration Judges (“IJ”) have authority under the Immigration and Nationality Act, and its accompanying regulations, to permit the release of individuals from immigration detention upon the posting of a monetary bond. 8 U.S.C. § 1226(a); 8 C.F.R. §§ 1003.19; 1236.1. While ICE ERO or an IJ may set the bond amount, payment of the bond is exclusively made to ICE.

Since January 2018, Requesters have observed an increasing pattern of bond-eligible individuals and obligors facing obstacles at ICE ERO Bond Acceptance locations upon posting or attempting to post a bond, or in securing a bond refund. Despite having undergone an initial

custody determination, or a custody redetermination in which a monetary bond amount is set by either ICE ERO or an IJ, individuals often face extended detention because obligors must make repeated attempts to post their bond. Those previously released on bond may also face re-detention.

REQUESTERS

Requesters are twenty-six organizations with bond funds from throughout the country whose core work includes assisting impacted communities in obtaining the release of people held in government custody. Since June 2018, Requesters have collectively spent over \$24 million directly to secure the release of thousands of individuals in custody who are impacted by the immigration system.

RAICES, a 501(c)(3) non-profit legal services agency based in San Antonio, Texas, defends the rights of immigrants and refugees, empowers individuals, families, and communities, and advocates for their liberty and justice. With legal services, social programs, bond assistance, and an advocacy team focused on changing the narrative around immigration in this country, RAICES is operating on the frontlines of the fight for immigrant rights. RAICES has established the largest immigration Bond Fund in the nation.

National Bail Fund Network is a national project that works with organizers, advocates, and legal providers across the country that are using, or contemplating using, community bail funds as part of efforts to radically change local bail systems and reduce incarceration. The Network was established in September 2016 and is made up of over 80 community bail funds that use the regular payment of bail as well as strategic bail out actions in campaigns to end money bail and pretrial detention in both the criminal legal and immigration detention systems.

Keep Tucson Together is a community-based immigration legal clinic in Tucson, Arizona providing free services to residents of Pima County. We represent indigent Pima County residents in removal proceedings, help residents apply for US citizenship, and help applicants in the DACA program. Through the No More Deaths bond fund, we also raise money to pay immigration bonds.

Prairielands Freedom Fund pays immigration bond and pretrial bail to free people from detention. We prioritize bond payment for people who live in Iowa or who are coming to live in Iowa, and also pay bond for residents of other prairielands states (broadly, Nebraska, Missouri, Wisconsin, Minnesota, Illinois, South Dakota, and North Dakota) who are otherwise unable to find bond assistance.

LGBTQ Freedom Fund fights queer criminalization: LGBTQ people are three times more likely than heterosexual individuals to be incarcerated. In the U.S., a tangle of discrimination and poverty disproportionately traps LGBTQ people in cycles of incarceration. At some point in their lives, half of homeless people are incarcerated and 70 percent of low-income LGBTQ people become homeless. The LGBTQ Freedom Fund raises awareness of this overwhelmingly overlooked issue and in tandem secures the release of queer and HIV-positive individuals in detention by paying their bond.

NorCal Resist ICE Bond Fund assists Northern California families in reuniting with their loved ones.

Minnesota Freedom Fund envisions a world where justice restores the humanity and dignity of all involved. MFF pays criminal bail and immigration bonds for those who cannot otherwise afford to as we seek to end discriminatory, coercive, and oppressive jailing.

Emergency Release Fund was founded to free trans people from life-threatening incarceration and works to release people from confinement using legal, financial and advocacy means.

Brooklyn Community Bail Fund (BCBF) is committed to challenging the criminalization of race, poverty and immigration status, the practice of putting a price on fundamental rights, and the persistent myth that bail is a necessary element of the justice system. Leveraging our groundbreaking work as a charitable bail fund, BCBF joined with other community-based organizations, immigration advocates and legal services providers to form the New York Immigrant Freedom Fund program (NYIFF). Operated by BCBF, the NYIFF program secures the freedom of New Yorkers held in ICE detention who cannot afford to pay bond.

New Sanctuary Coalition (NSC) is a multi-faith immigrant-led organization that creates support systems for and empowers those navigating the immigration system. NSC's grassroots programs are designed to shine a light on and disrupt the systems that criminalize immigrants' existence.

Fair Fight Immigrant Bond Fund (FFBF) is an initiative of the Washington Immigrant Solidarity Network (WAISN) that pays bonds for individuals detained in immigration detention in the State of Washington. The goal of the FFBF is to ensure that all those granted a bond option can take advantage of it.

Beyond Bond & Legal Defense Fund's mission is to support and bond immigrant detainees out of immigration detention facilities in Massachusetts and Rhode Island, or detained elsewhere in the United States but coming to live in Massachusetts.

Immigrant Family Defense Fund works toward a world where families can safely stay together, without fear of being separated by detention or deportation. IFDF helps access legal representation for parents and children in northern California schools who are facing the threat of deportation, and those in immigration detention get released on bond.

Haitian Immigrant Bail Assistance Project (HIBAP) is an organization that was founded on the ideals of aiding Haitian immigrants and Black refugees and raising awareness about their plights. HIBAP seeks to give a voice to those who have been overlooked in the landscape of immigration and advocacy work. Our organization advocates for justice and equality for all.

Connecticut Bail Fund's mission is to reduce the direct harms caused by criminalization, incarceration, and deportation while building power among the people and families in our community who are most impacted by these systems.

Orange County Justice Fund is dedicated to generating support for transformative and effective legal representation for some of the most vulnerable members of the Orange County community. An estimated 310,000 undocumented immigrants live in Orange County, and are at risk of detention and deportation. The Orange County Justice Fund (OCJF) was created in 2017 through a collaboration of attorneys, law professors, and grassroots leaders to ensure that no Orange County resident is forced to defend themselves from deportation without an attorney, and to provide support so that those individuals eligible to be released from detention can do so without being financially devastated.

Arriba Las Vegas Worker Center is a grassroots organization that unites day laborers, domestic workers, and other low-wage and migrant workers to defend their rights, fight for dignity and win justice for all. Our mission is to develop, educate, and empower worker and migrant communities to take action to defend their rights as workers and migrants.

New Hampshire Conference United Church of Christ Immigrant and Refugee Support Group follows the biblical mandate to welcome the stranger by providing detention, bond, and post detention support to immigrants from Maine, Vermont and New Hampshire.

Chicago Community Bond Fund (CCBF) pays bond for people charged with crimes in Cook County, Illinois. Through a revolving fund, CCBF supports individuals whose communities cannot afford to pay the bonds themselves and who have been impacted by structural violence. Inability to pay bond results in higher rates of conviction, longer sentences, loss of housing and jobs, separation of families, and lost custody of children. By paying bond, CCBF restores the presumption of innocence before trial and enables recipients to remain free while fighting their cases. CCBF also engages in public education about the role of bond in the criminal legal system and advocates for the abolition of money bond. CCBF is committed to long-term relationship building and organizing with people most directly impacted by criminalization and policing.

Kent County I-BOND (Immigrant Bond for Our Neighbors' Defense) Fund is a bond fund for people in Kent County, Michigan facing detention on immigration-related charges. Our community-supported bond fund pays partial or full amounts of the bond needed to free our neighbors from cages, allowing them to return to their loved ones & their jobs before their court date, and increasing their chances of winning their case & remaining in their community

Black Immigrants Bail Fund is a National project of the Haitian Bridge Alliance (HBA) and African Bureau for Immigration and Social Affairs (ABISA) with support of other Black led organizations that provides free assistance and relief to black immigrants in pursuit of Liberation and Justice. Our commitment is to eradicate the mass incarceration of black immigrants and level the playing field of equity in due process; transforming *one life at a time*.

Border Angels Familias Reunidas Bond Program is a program of Border Angels, a

nonprofit organization that advocates for human rights, humane immigration reform, and social justice with a special focus on issues related to the US-Mexican border.

Etowah Freedom Fund assists with bonds, commissary, and other expenses for incarcerated people, with a focus on those caged by ICE at the Etowah County Detention Center in Gadsden, AL. We are an abolitionist group and believe no one belongs in a cage.

Immigrant Freedom Fund of Colorado was formed to fill in a gap in the available services in Colorado for people coming to our country who are taking the brunt of our current administration's cruel immigration policies. Our assumption was that, by bonding out one person at a time, we could make a difference in each person's life. We represent that the welcoming message our country has traditionally sent to those who are fleeing violence and misery is still alive in the heart in the USA.

Vermont Freedom Bail Fund's mission is to provide bail funds for the early release of undocumented immigrants from prison to avoid deportation, to enable them to return to their families, communities and employment as soon as possible, and to have access to more legal options in their immigration cases, while creating solidarity between people seeking justice in a period of increased incarceration and criminalization of people of color.

Georgia Immigration Bond Fund is designated to provide financial assistance to individuals at one of the four detention centers in Georgia: Stewart Detention Center, Irwin County DC, Folkston DC, and Robert A. Deyton DC - known to be some of the worst detention centers in the U.S. The bond fund is launched by Georgia Latino Alliance for Human Rights, a community-based organization that develops statewide grassroots leadership in Latinx immigrant communities.

DEFINITIONS

The term "rejection" of a bond used in this Request is meant to describe circumstances in which ICE ERO refuses to accept monetary bond payments for a bond-eligible individual. The term "revocation" of a bond is defined by *Matter of Sugay*, 17 I. & N. Dec. 637, 640 (BIA 1981), in which an individual previously released on bond was rearrested based on a change in circumstances. The term "cancellation" of a bond is meant to describe those circumstances in which an individual who has posted a monetary bond has met all the conditions of the subject's release and is entitled to a return of the monetary bond originally posted. Incidents arising from the rejection, revocation, or cancellation of a bond have happened at ICE ERO Bond Acceptance locations around the United States.

The term "records" as used in the Request includes all records preserved in electronic or written form, including but not limited to: e-mails; text communications between phones or other electronic devices (including but not limited to, communications sent via SMS or other text, Blackberry Messenger, iMessage, WhatsApp, Signal, G-chat, or Twitter direct message); images, video, and audio recorded on cell phones; voicemail messages; social-media posts; formal and informal presentations; alerts; bulletins; advisories; post-it notes, and minutes or notes of

meetings and phone calls. Please note: Should any responsive record contain personally identifying information of any third party, Requesters ask that the information be redacted.

RECORDS REQUESTED

Requesters seek all records in the custody or control of U.S. Immigration and Customs Enforcement existing or generated as of January 2018 as follows:

1. Written procedures, including but not limited to, guidelines, instructions, forms, memoranda, manuals, standard operating procedures and statements of general policy regarding:
 - a. Verification and acceptance of bond payments; including:
 - i. Requirements obligors must meet, and the documents obligors must provide, before ICE accepts payment of a bond;
 - ii. Specific rules, requirements, or policies based on country of origin, birth, or citizenship;
 - b. When bond payments will be refused, including the refusal of a monetary bond payment or revocation of a bond based on changed circumstances;
 - c. Referral of documents from obligors who attempt to pay bonds to the ICE Homeland Security Investigations Forensic Laboratory, including but not limited to any information provided to detained individuals and/or obligors regarding this possibility, and any appeal process or other recourse available to detained individuals or obligors who are subjected to this procedure;
 - d. Revocation of immigration bonds;
 - e. Cancellation of immigration bonds;
 - f. Refund of immigration bonds;
 - g. Mechanisms a previously bond-eligible individual can invoke to challenge the revocation of, or breach of bond;
 - h. Mechanisms that a bond obligor can invoke to challenge the rejection of a bond payment, revocation of, or breach of bond; and
 - i. Instructions to any third party contractors (e.g. GEO Group, CoreCivic) that detain bond-eligible individuals regarding bond, including but not limited to revocations or breaches of a bond and imposition of any additional requirements after a monetary bond has been paid.
2. Directives, guidance or other instruction to ICE personnel in making decisions or determinations regarding:
 - a. Verification of whether an obligor has met required criteria before ICE accepts payment of a bond;
 - b. Refusal of a payment, revocation, cancellation, or refund of a bond;
 - c. Referral to a second reviewer to determine whether ICE should reject payment, revocation, cancellation, or refund of a bond; and
 - d. Referral of a change in circumstances to a different entity or agency.
3. Records or reports from January 2018 to the present that compile the following:

- a. Total number of individuals that ICE has taken back into custody due to “changed circumstances”
 - i. For each individual, provide estimates, descriptions, or reference of the timeframe between the:
 1. occurrence of the relevant changed circumstance(s);
 2. the commencement of an investigation;
 3. referral if referred to a different entity;
 4. completion of the investigation; and
 5. when the relevant changed circumstance was determined to have occurred;
 - b. Total number of bonds that ICE has refused to accept payment of due to “changed circumstances”
 - i. For each instance, provide estimates, descriptions, or reference of the timeframe between the:
 1. date the bond amount was set (whether by ICE or IJ);
 2. occurrence of the relevant changed circumstance(s);
 3. date when an obligor first attempted to pay the bond;
 4. date when ICE refused to accept payment of the bond; and
 - ii. For each instance, provide the basis of the “changed circumstance” that ICE relied on to refuse acceptance of payment;
 - c. Total number of cancellations (Form I-391) that have been issued
 - i. For these, please also include:
 1. Number of requests for a bond refund that ICE received following the issuance of Form I-391, and date of the request for a bond refund;
 2. Number of bond refunds that ICE has issued. For this number, please also provide:
 - a. date the bonded individual met the conditions of the bond;
 - b. date ICE canceled the bond;
 - c. date ICE notified the obligor of the bond cancellation;
 - d. date the obligor completed the bond refund process; and
 - e. date ICE issued the refund;
 3. Number of requests for a bond refund that remain pending;
 4. Number of requests for a bond refund that remain unclaimed. For this last number, please also provide:
 - a. Any additional efforts to notify the obligor or the individual whose bond was canceled.
4. Records or reports from January 2018 to the present that compile the following:
 - a. Number of monetary bonds for which ICE has rejected payment based on a criminal history:
 - i. For this total, whether the criminal history pertains to the detained individual or the proposed obligor;
 - b. Number of monetary bonds that ICE has revoked, or rejected based on a criminal history:

- i. For this total, whether the criminal history pertains to the detained individual or the proposed obligor;
 - c. Number of monetary bonds for which ICE initially revoked, or rejected payment, and whether such decision was overturned due to additional review;
 - d. Number of breached bonds
 - i. For this number, please also provide:
 1. The reason for ICE's determination that the bond was breached;
 2. Whether an I-290B form was filed;
 3. Total number of I-290B forms that remain pending; and
 4. Outcome of I-290B forms for which a decision has been issued.
5. Written communications (including, but not limited to, letters, emails, records of phone calls) from January 2018 to the present as described below:
 - a. To the bond-eligible individual and/or individual's legal representatives regarding ICE's rejection of payment, revocation, or cancellation of a bond;
 - b. To an obligor regarding the rejection of payment, revocation, or cancellation of a bond;
 - c. To the ICE ERO office or immigration judge that originally issued the bond of ICE's rejection of payment, revocation, or cancellation of a bond; and
 - d. To Alternative to Detention (ATD) Programs and/or Intensive Supervision Appearance Programs (ISAP) enrolling a bond-eligible individual, including but not limited to the requirements an individual must meet after a monetary bond has been paid.
6. Communications or reports between ICE Headquarters, ERO, and/or the Office of the Principal Legal Advisor regarding:
 - a. Instances in which ICE prevented an individual from posting a monetary bond or required further documentation or approval before the bond-eligible individual was released into the United States on a monetary bond; and
 - b. Rejection of a bond payment or revocation of a bond based on changed circumstances.
7. Blank copies of each form utilized at any stage of the bond process, including but not limited to Forms I-391, I-323, and I-340; and
8. A list of all ICE ERO Offices or other locations nationwide where bonds can be paid, along with address, phone number, and hours during which an obligor can pay a bond;
9. Copies of any signs, forms, or instructions accessible to an obligor for each location in the preceding paragraph (such as signs/flyers hanging in the payment window, or documents provided on a clipboard to an obligor, but not limited to these examples).

Time frame: This Request covers records created on or after January 1, 2018.

Agency's search obligation: The Agency must search all electronic and paper/manual indices, filing systems, and locations for any and all records relating or referring to the subject of their

Request. This includes any email accounts and cell phones used by employees and former employees for agency business, whether they are personal or Agency systems. For each relevant email account identified, all storage areas are included in this Request, including, but not limited to, the inbox “folder” (and all subfolders therein), sent folder, deleted folder, outbox folder, and all relevant archive files.

If any records responsive or potentially responsive to the Request have been destroyed, the Request includes, but is not limited to, any and all records relating or referring to the destruction, or the events leading to the destruction, of those records.

Format of production: The Requesters ask that responsive electronic records be provided in their native file format if possible, but for the ease of administration and to conserve resources, the Requesters will accept documents produced in any readily accessible electronic format.

REQUEST OF WAIVER OF OR LIMITATION ON FEES

Requesters seek a fee waiver because disclosure is in the public interest, and Requesters are not commercial entities, but rather all are non-profit organizations. Fee waivers should be granted here, given that Congress intended FOIA to be construed liberally in favor of granting waivers for noncommercial requesters like Requesters. *See Judicial Watch Inc. v. Rossotti*, 326 F.3d 1309, 1312 (D.C. Cir. 2003) (“Congress amended FOIA to ensure that it be liberally construed in favor of waivers for noncommercial requesters.” (internal quotation marks and citations omitted)).

Requesters ask that all fees associated with this FOIA request be waived because the disclosure of the requested records is “in the public interest.” 5 U.S.C. § 552(a)(4)(A)(iii). This is so because disclosure is “likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester.” *Id.*; 6 C.F.R. § 5.11 (k)(1).

The Request meets each of the factors that the agency should consider under 6 C.F.R. § 5.11(k)(2) in determining whether the disclosure is “likely to contribute significantly to public understanding of the operations or activities of the government.”

First, the Request pertains directly to “operations or activities of the federal government,” as ICE is a federal entity. *Id.* § 5.11(k)(2)(i). Further, the collection of bond is a crucial federal operation that impacts thousands of individuals every year.

Second, the Request is “likely to contribute” to “an increased public understanding of” the government’s operations or activities, *id.* § 5.11(k)(2)(ii), specifically by helping the public understand ICE’s procedures as they relate to bonds, and why ICE frequently rejects or revokes bonds previously issued to an individual due to a finding of a breach of bond, and why bond cancellations and refunds are delayed, even after an individual complies with the bond terms. For example, Requesters Keep Tucson Together and Connecticut Bail Fund share information with the public on issues facing those in detention and the importance of bond.¹ Requester

¹ Keep Tucson Together, *Emergency Covid-19 Bond Fund*, <https://www.keeptucsonttogether.org/bond-fund> (last

Emergency Release Fund updates the community on issues facing the incarcerated populations that it serves.² Requesters Minnesota Freedom Fund and Beyond Bond & Legal Defense Fund provide ample information for the public to understand how the bail and bond process functions.³ Requester Arriba Las Vegas Worker’s Center supports advocacy by its members on issues affecting them, including bond issues.⁴ Requesters Prairielands Freedom Fund, Brooklyn Community Bail Fund, and Immigrant Freedom Fund of Colorado provide support and guidance to individuals challenging incarceration and detention.⁵ Requester Immigrant Family Defense Fund provides a wealth of resources to affected communities to support those released on bond.⁶ The information provided by this Request will directly impact the Requesters in their ability to help the public better understand the government’s operations or activities.

Third, the disclosure of the requested records will contribute to “the understanding of a reasonably broad audience of persons interested in the subject,” *id.* § 5.11(k)(2)(iii), because Requesters intend to analyze the responsive records and make public their findings in support of overall policy and advocacy work to maintain a fair and robust bond fund to ensure that bond-eligible individuals avoid unnecessary extended detention. For example, Requester RAICES, with the largest bond fund in the country, has a significant social media presence and intends to make the response and subsequent analysis public.⁷ Requesters LGBTQ Freedom Fund, Black Immigrants Bail Fund, and Haitian Immigrant Bail Assistance Project offer resources to the public on the harms facing specific populations that are subject to detention.⁸ Requester New Sanctuary Coalition has a large social media following and provides information and updates to the public related to bond and detained individuals.⁹ Requester National Bail Fund Network coordinates bond work across the country and provides a wealth of resources to those seeking an end to incarceration.¹⁰ Requester Chicago Community Bond Fund offers resources, education, and advocacy to the community at large to support those seeking release from custody.¹¹

visited Nov. 23, 2020); Connecticut Bail Fund, *#Surviving Inside*, <http://www.ctbailfund.org/surviving-inside> (last visited Nov. 23, 2020).

² Emergency Release Fund, <https://www.facebook.com/EmergencyReleaseFund/> (last visited Nov. 23, 2020).

³ Minnesota Freedom Fund, *Bail Explained*, <https://mnfreedomfund.org/bail-explained> (last visited Nov. 23, 2020); Beyond Bond & Legal Defense Fund, *Beyond Bond & Legal Defense Fund FAQ*, <https://www.beyondbondboston.org/faq> (last visited Nov. 23, 2020).

⁴ Arriba Las Vegas Worker’s Center, *Campaigns*, <https://arribalasvegas.org/campaigns/> (last visited Nov. 23, 2020).

⁵ Prairieland Freedoms Fund, *Why Abolition?*, <https://www.prairielandfreedomfund.org/bond-bail-and-abolition> (last visited Nov. 23, 2020); Brooklyn Community Bail Fund, *Bail Resources*, <https://brooklynbailfund.org/criminal-legal-bail-resources> (last visited Nov. 23, 2020); Immigrant Freedom Fund of Colorado, *About Us*, <https://immigrantfreedomfund.org/about/> (last visited Nov. 24, 2020).

⁶ Immigrant Family Defense Fund, *Resources*, <https://immigrantfamilies.org/newsandresources/> (last visited Nov. 24, 2020).

⁷ RAICES, *Bond Program*, <https://www.raicestexas.org/what-we-do/social-services/bond-program/> (last visited Nov. 23, 2020).

⁸ LGBTQ Freedom Fund, *We Fight the Mass Jailing of LGBTQ People*, <https://www.keeptucsontgether.org/bond-fund> (last visited Nov. 23, 2020); Black Immigrants Bail Fund, *About Us*, <https://www.blackimmigrantsbailfund.com/what-we-do> (last visited Nov. 24, 2020); Haitian Immigrant Bail Assistance Project, *About*, <https://hibap.org/about/> (last visited Nov. 23, 2020).

⁹ New Sanctuary Coalition, *Bond Fund*, https://www.newsanctuarynyc.org/life_bond_fund (last visited Nov. 23, 2020).

¹⁰ National Bail Fund Network, *All Resources*, <https://www.communityjusticeexchange.org/all-resources> (last visited Nov. 23, 2020).

¹¹ Chicago Community Bond Fund, *The Revolving Fund*, <https://chicagobond.org/the-revolving-fund/> (last visited Nov. 23, 2020).

Requesters have robust networks and a large presence nationwide, ensuring that the Request will contribute to a broad audience's understanding of the bond system.

Finally, disclosure will enhance the public's understanding of the subject of the Request "to a significant extent," *id.* § 5.11(k)(2)(iv). Although there has been media and public interest in this issue, as described above, much remains unknown and the requested records will shed light on bond payment procedures, as well as exactly how often bond-eligible individuals and obligors are unable to post or obtain refunds of bonds and why. For example, Requesters NorCal Resist, Fair Fight Immigrant Bond Fund, Orange County Justice Fund, Kent County I-Bond Fund, and Etowah Freedom Fund support the release of those in detention, who thus may be at risk of re-detention.¹² Requesters New Hampshire Conference United Church of Christ Immigrant and Refugee Support Group and Georgia Immigration Bond Fund provides advocacy and support for their local communities and those recently released from detention.¹³ Border Angels Familias Reunidas Bond Program complements legal and educational services offered by Border Angels in Southern California.¹⁴ All Requesters assist the public in obtaining cancellation and refund of bonds, and the Request directly relates to this issue.

Perhaps more than anything, the Request will answer the very compelling public interest in obtaining guidance regarding the payment, rejection, revocation, cancellation, and refund of bonds, including the additional procedures that go into bond payments such as background checks on obligors. ICE has provided very little guidance on these processes yet maintains significant decision-making authority when it comes to these actions. Further, ICE's arbitrary and non-transparent procedures create undue harm to communities. ICE's lack of transparency regarding bond procedures causes a burden on the human and financial resources of bond fund organizations, including attorneys and volunteers, who must often deal with arbitrary ICE practices and decision-making. The lack of clear guidance to the public on bond procedures also causes emotional and financial suffering to detained noncitizens seeking to be released as well as their loved ones.

Requesters work with a broad array of individuals in the United States. As previously stated, each requester is a non-profit entity that supports individuals held in government custody, and hails from various parts of the country. The Request is also not in the commercial interest of Requesters. Any records obtained as a result of this FOIA request will be made available to the public at no cost.

CONCLUSION

¹² NorCal Resist, *Bail Fund*, <https://www.norcalresist.org/bail-fund.html> (last visited Nov. 23, 2020); Fair Fight Bond Fund, *About*, <https://fairfightbondfund.org/about/> (last visited Nov. 23, 2020); Orange County Justice Fund, *Our Goals*, <https://ocjusticefund.org/our-goals/> (last visited Nov. 23, 2020); Kent County I-Bond Fund, *The Facts*, <https://www.gribond.org/facts> (last visited Nov. 23, 2020); Etowah Freedom Fund, *About*, <http://etowahfreedomfund.org/about> (last visited Nov. 24, 2020).

¹³ New Hampshire Conference United Church of Christ, *Immigrant and Refugee Support Group*, <https://www.nhcucc.org/conference-ministries/justice-witness-ministry/immigration-mission-group> (last visited Nov. 23, 2020); Georgia Immigration Bond Fund, *Georgia Immigration Bond Fund*, <https://secure.actblue.com/donate/gaimmbondfund#edit> (last visited Nov. 24, 2020).

¹⁴ Border Angels Familias Reunidas Immigration Bond Program, *Bond Program*, <https://www.borderangels.org/bond-program.html> (last visited Nov. 24, 2020).

We expect your response within twenty (20) business days, as required under 5 U.S.C. § 552(a)(6)(A)(i). In your response, please specify the search that was undertaken to locate records responsive to this Request. If the Request is denied in part or in whole, please justify all redactions by reference to specific FOIA exemptions and release all segregable portions of otherwise exempt material.

On behalf of all Requesters, please furnish copies of all applicable information to:

Manoj Govindaiah
RAICES
(210) 787-3745
Manoj.govindaiah@raicestexas.org

Please notify us in advance if any costs relating to the Request exceeds \$100.00.

If you have any questions regarding this request, you may contact Manoj Govindaiah, RAICES, at (210) 787-3745 or at manoj.govindaiah@raicestexas.org. Thank you in advance for your timely cooperation.

Sincerely,



Manoj Govindaiah
RAICES
Manoj.govindaiah@raicestexas.org

/s/ Blake Vera
Blake Vera
RAICES
Blake.vera@raicestexas.org

/s/ Pilar Weiss

/s/ Philip Stump Kennedy

Pilar Weiss
National Bail Fund Network
pilar@communityjusticeexchange.org

Philip Stump Kennedy
Keep Tucson Together
kttimmigration@nomoredeaths.org

/s/ Julia Zalenski

/s/ Scott Greenberg

Julia Zalenski
Prairielands Freedom Fund
julia@prairielandsfreedomfund.org

Scott Greenberg
LGBTQ Freedom Fund
scott@lgbtqfund.org

/s/ Autumn Gonzalez

/s/ Biftu Bussa

Autumn Gonzalez
NorCal Resist ICE Bond Fund

Biftu Bussa
Minnesota Freedom Fund

autumnrg@gmail.com

/s/ Martin Kaminer

Martin Kaminer
Emergency Release Fund
info@emergencyreleasefund.com

/s/ Andres Jimenez

Andres Jimenez
New Sanctuary Coalition
andres@newsanctuarynyc.org

/s/ Rachel Lewis

Rachel Lewis
Beyond Bond & Legal Defense Fund
rlewis@jcrceboston.org

/s/ L. Christelle Etienne

L. Christelle Etienne
Haitian Immigrant Bail Assistance Project
cetienne@hibap.org

/s/ Carlos Perrea

Carlos Perrea
Orange County Justice Fund
carlosiran1992@gmail.com

/s/ Nancy Pierpont

Nancy Pierpont
NH Conference United Church of Christ
Immigrant and Refugee Support Group
nancy-pape@comcast.net

/s/ Geoffrey L. Gillis

Geoffrey L. Gillis
Kent County I-Bond Fund
gillis.geoff@gmail.com

/s/ Seydi Sarr

biftu@mnfreedomfund.org

/s/ Rosa Santana

Rosa Santana
Brooklyn Community Bail Fund
Rsantana@brooklynbailfund.org

/s/ Vanessa Reyes

Vanessa Reyes
Fair Fight Bond Fund
vanessa@waisn.org

/s/ Benita Jain

Benita Jain
Immigrant Family Defense Fund
benita@immigrantfamilies.org

/s/ Ana Maria Rivera-Forastieri

Ana María Rivera-Forastieri
Connecticut Bail Fund
ana.maria@ctbailfund.org

/s/ Bliss Requa-Trautz

Bliss Requa-Trautz
Arriba Las Vegas Worker Center
bliss@arribalavasvegas.org

/s/ Sharlyn Grace

Sharlyn Grace
Chicago Community Bond Fund
sharlyn@chicagobond.org

/s/ Guerline Jozef

Guerline Jozef
Black Immigrants Bail Fund
blackimmigrantbailfund@gmail.com

/s/ Dulce Garcia

Seydi Sarr
Black Immigrants Bail Fund
blackimmigrantbailfund@gmail.com

/s/ Gabriel Caban Cubero

Gabriel Caban Cubero
Etowah Freedom Fund
cabancubero@gmail.com

/s/ Sandy Batchelder

Sandy Batchelder
Vermont Freedom Fund
Sandybatch@me.com

Dulce Garcia
Border Angels Familias Reunidas
Immigration Bond Program
Garcia@borderangels.org

/s/ Francey Liefert

Francey Liefert
Immigrant Freedom Fund of Colorado
franceyliefert@gmail.com

/s/ Alondra Barrera Garcia

Alondra Barrera Garcia
Georgia Immigration Bond Fund
alondra@glahr.org