



March 25, 2021

To Whom It May Concern:

I represent Luigi Coretti. Pursuant to the Agency's Touhy regulations, 6 C.F.R. 5.41 et seq., the Freedom of Information Act and all other applicable legal authority regarding an open and transparent government including but not limited to Executive Order 13924, the undersigned hereby requests the following records and/or information:

1. Any and all documents/information that identify any of the reasons that Luigi Coretti was detained at the border between the United States and Canada on June 22, 2017;

2. The names, titles and contact information for each individual who provided any information and/or documents that lead to the detention of Luigi Coretti at the border between the United States and Canada on June 22, 2017; and

3. Any and all documents/information that corrected any "records that our inquiries determined were necessary, including, as appropriate, notations that may assist in avoiding incidents of misidentification" as noted in the attached letter dated September 13, 2017. The preceding documents/information should include the records as they existed immediately prior to any corrections and the records as they existed immediately after any corrections.

Background:

On June 22nd, 2017, Mr. Luigi Coretti was detained at the border of the United States and Canada and then refused admission into the United States. As set forth in the attached letter dated September 13, 2017, there may be records that were "corrected", on or after June 22, 2017, by the U.S. Department of Homeland Security.

This request is not being made for commercial purposes. I have conducted legal research and made inquiry to the U.S. Attorneys' office and based thereon, I have concluded that are no other viable alternatives, other than this request, to obtain the requested documents and/or information.

EDWARD J. O'CONNELL
1925-1939
SAMUEL E. ARONOWITZ
1925-1973
LEWIS A. ARONOWITZ
1951-1979

CORNELIUS D. MURRAY
STEPHEN R. COFFEY
JEFFREY J. SHERRIN
THOMAS J. DiNOVO
PAMELA A. NICHOLS
JEFFREY A. SIEGEL
DAVID R. ROSS
KURT E. BRATTEN
MICHAEL P. McDERMOTT
PETER A. PASTORE
KEVIN LAURILLIARD
KELLY J. MIKULLITZ
WILLIAM F. BERGLUND
ROBERT J. KOSHGARIAN
MATTHEW J. DORSEY
SCOTT W. ISEMAN
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KAREN MARTINO VALLE
ROLAND M. CAVALIER

MICHAEL Y. HAWRYLCHAK
ANDREW KO
SAMANTHA L. FEMIA
MARINA W. CHU

HOLLY E. VEGAS*
*(DIRECTOR, HEALTHCARE
CONSULTING GROUP)*

*NOT A MEMBER OF THE
LEGAL PRACTICE

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If the documents and/or information that is produced in response to this letter/request are ambiguous, confusing or require clarification or elaboration, the undersigned respectfully requests the testimony of an individual who can clarify or elaborate upon the documents and/or information that are produced in response to this letter/request.

In the event that there are fees, I would be grateful if you would inform me of the total charges in advance of fulfilling my request. I would prefer my request to be electronically responded to, by e-mail attachment if available or if not available, by stick drive, CD-ROM, etc.

Thank you in advance for your anticipated cooperation in this matter. I look forward to receiving your response to this request within the applicable legal deadlines.

Respectfully,

O'CONNELL AND ARONOWITZ

Kevin Laurilliard

KL