## **EXHIBIT 11**



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September 19, 2017

VIA Email to <u>ICE-FOIA@dhs.gov</u>
U.S. Immigration and Customs Enforcement
Freedom of Information Act Office
500 12<sup>th</sup> Street, S.W., Stop 5009
Washington, D.C. 20536-5009

**RE:** Freedom of Information Act Request

To Whom it May Concern:

This is a request for information under the Freedom of Information Act ("FOIA"), 5 U.S.C. §552. We request the following records in the custody or control of the Department of Homeland Security (DHS), and its relevant subsidiary agencies or departments, including Immigration & Customs Enforcement (ICE). As used in this request, the term "relating to" or "related to" means referring to, constituting, representing, defining, depicting, concerning, embodying, reflecting, identifying, stating, mentioning, governing, addressing, or pertaining to the subject matter of the request in whole or in part, directly or indirectly.

The purpose of this request is to seek information regarding the detention facility in Adelanto, California, where ICE detainees are held. The facility has been variously referred to as Adelanto Detention Facility, Adelanto Detention Center, and the Adelanto ICE Processing Center. The facility has two buildings, one known as Adelanto East located at 10400 Rancho Road, Adelanto, CA 92301, and the other known as Adelanto West located at 10250 Rancho Road, Adelanto, CA, 92301. It is our understanding that since 2011, the facility has been owned and operated by the GEO Group and houses ICE detainees. Unless otherwise specified, all references to a detention facility in this letter are to the GEO facility in Adelanto, CA, housing ICE detainees.

 Any contracts or agreements between ICE and the company, Geo Group, Inc., GEO Medical, or any other subsidiary of Geo Group, Inc. to provide medical care services at Adelanto Detention Facility. The timeframe for this request is January 1, 2010, until the date that a search is conducted for records responsive to this FOIA request. U.S. Immigration and Customs Enforcement September 19, 2017 Page 2

- 2. Any contracts or agreements between ICE and the company, Correct Care Solutions to provide medical care services in Adelanto Detention Facility. Alternatively, any subcontracts or agreements between Geo Group and Correct Care Solutions to provide medical care services in Adelanto Detention Facility. The timeframe for both of these requests is January 1, 2010, until the date that a search is conducted for records responsive to this FOIA request.
- 3. Any documents or internal communications relating to the decision to terminate the contract with Geo Group, Inc. to provide medical care at the Adelanto Detention Facility.
- 4. Any documents or internal communications relating to the decision to subcontract with Correct Care Solutions to provide medical care at the Adelanto Detention Facility.
- 5. Any documents or internal communications produced by the DHS Office of Civil Rights and Civil Liberties (CRCL) during their December 2015 inspection of the Adelanto Detention Facility, including but not limited to any communication between CRCL and other departments of ICE regarding the medical care provider at the Adelanto Detention Facility.

Please contact me if you need any clarification on the records requested. If you have an electronic means of providing this information that would be acceptable. If copying is required, we will pay reasonable copying costs up to \$500. If you expect copying costs to exceed that amount, please contact me first. Please reply to this request within 20 working days, or as required by statute.  $5 \text{ U.S.C. } \S 552 \text{ (a)(6)(A)(1)}$ .

Finally, if these records are not in your custody or control, then I ask that you promptly notify me and also state in detail to the best of your knowledge and belief the reason for the absence of the records from your custody or control, the location of the records, and identify the person(s) now having custody or control of the records.

Sincerely,

CIVIL RIGHTS EDUCATION
AND ENFORCEMENT CENTER

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Paralegal