

## Americans for Immigrant Justice

formerly Florida Immigrant Advocacy Center

December 15, 2017

### VIA FIRST CLASS AND ELECTRONIC MAIL

U.S. Immigration and Customs Enforcement  
Office of the Principal Legal Advisor  
U.S. Department of Homeland Security  
500 12th Street, S.W., Mail Stop 5900  
Washington, D.C. 20536-5900  
[ICE-FOIA@dhs.gov](mailto:ICE-FOIA@dhs.gov)

Privacy Office  
Attn: FOIA Appeals  
U.S. Department of Homeland Security  
245 Murray Lane, SW, Mail Stop 0655  
Washington, D.C. 20528-0655

**Re: *Freedom of Information Act (FOIA) Appeal - Ref. No. 2017-ICFO-15091***

Dear FOIA Officer:

On January 16, 2017, Americans for Immigrant Justice (“AI Justice”) submitted a Freedom of Information Act (“FOIA”) request via electronic mail and First Class Mail. *See* Exhibit A (hereinafter “FOIA request” or “request”). The FOIA request pertained to disclosure of any and all records that were authored, prepared, received, collected and/or maintained by or transmitted to the U.S. Department of Homeland Security (DHS) and/or U.S. Immigration and Customs Enforcement (ICE) that describe, refer or relate to DHS and/or ICE’s contractual or other relationship with the Atlantic Shores Hospital (ASH) located in Fort Lauderdale, FL and/or the GEO Group, Inc. (GEO) relating to any detention or processing facility located in Florida, and included ten (10) specific categories of information.

AI Justice received, via electronic mail, an acknowledgment letter from the ICE FOIA office on February 8, 2017, confirming receipt of the request as of January 18, 2017. *See* Exhibit B. The letter further indicated that the ICE FOIA office was invoking a ten day extension within which to respond to the request, pursuant to Title 5 U.S.C. § 552(a)(6)(B). However, more than two months passed without any such response. On April 26, 2017, AI Justice sought a status update regarding the response to the request and was informed that the “request status is request for documents sent,” but provided no “specific date on completion.” *See* Exhibit C. AI Justice followed up on May 4<sup>th</sup> and May 9<sup>th</sup> with additional questions relating to the status of the request,

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noting that the ICE FOIA website indicated that the documents “were already sent and provide[d] an estimated delivery date of March 7, 2017” although no documents were ever received. The ICE FOIA Office failed to respond to both May communications and only responded on July 11, 2017 after AI Justice submitted a third status inquiry that month, and then only to indicate that the request was “in processing.”

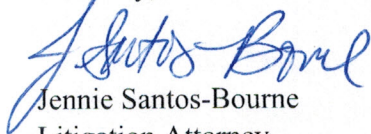
Finally on September 29, 2017, AI Justice received ICE's “final response to [y]our FOIA request,” despite not having received any *prior* response. See Exhibit D. This purported *final* response consisted of **one single section** of an unidentified document that ICE determined was the *only* responsive information to the entire request. The document is subtitled “Section C: Statement of Objectives,” is dated August 7, 2013 and only relates to a single detention facility, while the request clearly asks for information/documents “relating to any detention or processing facility located in Florida.” Ex. A. Thus, this single document portion is not fully responsive to the entirety of the request and further ignores all the ten sub-category of items/information specifically requested. The response is incomplete for failure to address each sub-category, for example, it includes no documents or information “regarding the number of DHS/ICE detainees held at any facility located in Florida, including BTC, who were referred to, transported to, treated and/or hospitalized at ASH” (*Id.* At ¶8) or “communications or other documents regarding the length (in hours or days) of stay and/or hospitalization at ASH, of all DHS/ICE detainees held at any facility located in Florida, including BTC (who were treated at and/or hospitalized at ASH).” *Id.* at 9.

AI Justice is not satisfied with the cursory and incomplete response to its request and is therefore appealing pursuant to the applicable procedures, namely the DHS regulations at 6 C.F.R. §5.8 and §5.9. Specifically, AI Justice “questions the adequacy of [ICE]'s search for responsive records, [and] believes the component either misinterpreted the request or did not address all aspects of the request,” thus issuing an incomplete response. 6 C.F.R. §5.8(a)(1). Without further delay, AI Justice demands that ICE make the required determination and respond to the appeal within the statutory time limit of twenty (20) working days after receipt. *Id.* at §5.8(d). Additionally, this appeal constitutes a restatement of AI Justice’s request for a fee waiver.

In the event that we do not receive the required response and determination in the applicable time period, we will pursue appropriate legal action to enforce our rights under the FOIA.

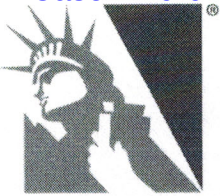
Thank you for your time and consideration. Please contact me at (305) 570-8925, or via email at [jsantos@aijustice.org](mailto:jsantos@aijustice.org) should you have any questions regarding this matter.

Sincerely,



Jennie Santos-Bourne  
Litigation Attorney

# Exhibit A



## Americans for Immigrant Justice

formerly Florida Immigrant Advocacy Center

January 16, 2017

### **VIA FIRST CLASS AND ELECTRONIC MAIL**

U.S. Immigration and Customs Enforcement  
Freedom of Information Act Office  
500 12th Street SW, Stop 5009  
Washington, D.C. 20536-5009  
[ICE-FOIA@dhs.gov](mailto:ICE-FOIA@dhs.gov)

**Re: Freedom of Information Act (FOIA) Request**

Dear FOIA Officer:

Americans for Immigrant Justice (AI Justice) submits this request for information under the Freedom of Information Act (FOIA), 5 U.S.C. § 552, *et. seq.* (hereinafter the "Request").

### **REQUEST FOR INFORMATION**

AI Justice requests disclosure of any and all records<sup>1</sup> that were authored, prepared, received, collected and/or maintained by or transmitted to the U.S. Department of Homeland Security (DHS) and/or U.S. Immigration and Customs Enforcement (ICE)<sup>2</sup> that describe, refer or relate to DHS and/or ICE's contractual or other relationship with the Atlantic Shores Hospital (ASH) located in Fort Lauderdale, FL and/or the GEO Group, Inc. (GEO) relating to any detention or processing facility located in Florida.

Specifically, please produce those records, dated January 2010 through December 2016, describing, referring or relating to:

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<sup>1</sup> The term "records" as used herein includes all records or communications preserved in electronic or written form, including but not limited to correspondence, directives, documents, data, videotapes, audiotapes, emails, faxes, files, guidance, standards, evaluations, instructions, analyses, memoranda, agreements, notes, orders, policies, procedures, protocols, reports, rules, technical manuals, technical specifications, training materials or studies, including records kept in written form, or electronic format on computers and/or other electronic storage devices, electronic communications and/or videotapes, as well as any reproductions thereof that differ in any way from any other reproduction, such as copies containing marginal notations.

<sup>2</sup> The term "ICE" as used herein refers to ICE headquarters offices, including any divisions, subdivisions or sections therein, ICE field operations offices, including any divisions, subdivisions or sections therein; ICE offices at ports of entry, including any divisions, subdivisions or sections therein; and any other ICE organizational structures and offices.

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- (1) All memoranda, reports, correspondence, communications, or other documents reflecting, recording or stating any contract for medical and/or mental health care services in place between DHS/ICE and GEO for any facility located in Florida.
- (2) All memoranda, reports, correspondence, communications, or other documents reflecting, recording or stating any contract for medical and/or mental health care services in place between DHS/ICE and ASH.
- (3) All guidance, guidelines, directives, rules, policies, procedures, memoranda, reports, correspondence, communications or other documents that address medical and/or mental health care services available and/or provided to DHS/ICE detainees held at any facility located in Florida, including the Broward Transitional Center (BTC) located in Pompano, FL.
- (4) All guidance, guidelines, directives, rules, policies, procedures, memoranda, reports, correspondence, communications or other documents that address physically restraining, in hand-cuffs, waist-chains or otherwise, DHS/ICE detainees held at any facility located in Florida, including BTC.
- (5) All guidance, guidelines, directives, rules, policies, procedures, memoranda, reports, correspondence, communications or other documents that address physically restraining, in hand-cuffs, waist-chains or otherwise, DHS/ICE detainees referred and/or transported to ASH.
- (6) All guidance, guidelines, directives, rules, policies, procedures, memoranda, reports, correspondence, communications or other documents that address visually or otherwise monitoring, including while they sleep, DHS/ICE detainees held at any facility located in Florida, including BTC.
- (7) All guidance, guidelines, directives, rules, policies, procedures, memoranda, reports, correspondence, communications or other documents that address visually or otherwise monitoring, including while they sleep, DHS/ICE detainees referred and/or transported to ASH.
- (8) All guidance, guidelines, directives, rules, policies, procedures, memoranda, reports, correspondence, communications or other documents regarding the number of DHS/ICE detainees held at any facility located in Florida, including BTC, who were referred to, transported to, treated and/or hospitalized at ASH.
- (9) All guidance, guidelines, directives, rules, policies, procedures, memoranda, reports, correspondence, communications or other documents regarding the length (in hours or days) of stay and/or hospitalization at ASH, of all DHS/ICE detainees held at any facility located in Florida, including BTC (who were treated at and/or hospitalized at ASH).

- (10) All memoranda, reports, correspondence, communications or other documents regarding the policies, procedures and/or instructions on referring and/or transporting DHS/ICE detainees from any facility located in Florida, including BTC, to ASH.

### **REQUEST FOR WAIVER OF ALL COSTS**

AI Justice respectfully requests that all fees associated with this FOIA request be waived. AI Justice is entitled to a waiver of all costs because disclosure of the information 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.” 5 U.S.C. § 522(a)(4)(A)(iii). *See also* 6 C.F.R. § 5.11(k) (Records furnished without charge or at a reduced rate if the information is in the public interest, and disclosure is not in commercial interest of institution). In addition, AI Justice has the ability to widely disseminate the requested information. *See Judicial Watch v. Rossoti*, 326 F.3d 1309 (D.C. Cir. 2013) (finding a fee waiver appropriate when the requester explained, in detailed and non-conclusory terms, how and to whom it would disseminate the information it received).

#### **i. Disclosure of the Information Is in the Public Interest**

AI Justice aims to protect and promote the basic human rights of immigrants through a unique combination of free direct services, impact litigation, policy reform and public education at local, state, and national levels. Grounded in real-world, real-people experience, AI Justice’s direct work with immigrant clients informs its broader policy work. Its multicultural and multilingual staff works to build alliances between immigrant and non-immigrant groups, including government, civic, social and faith-based communities. Advocates involved in immigration issues, the national media, and federal and state policy makers, consider AI Justice to be one of the most effective national groups fighting for immigrant justice.

With immigration reform on the horizon in Congress, immigration issues make up a major segment of the public discourse. Increasingly covered by U.S. media outlets, information regarding immigration matters is much more widely disseminated than ever before.<sup>3</sup>

Disclosure of the requested information will contribute significantly to public understanding of non-citizens’ information about ICE facilities, detention conditions and access to adequate medical and mental health care services afforded to detainees in Florida. The disclosed records will inform attorneys, advocates, members of the public and others concerned about detention conditions. AI Justice has the capacity and intent to disseminate widely the requested information to the public. To this end, AI Justice will post relevant information on

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<sup>3</sup> Eric Lipton and Julia Preston, *As U.S. Plugs Border in Arizona, Crossings Shift to South Texas*, N.Y. Times, June 16, 2013, available at <http://www.nytimes.com/2013/06/17/us/as-us-plugs-border-in-arizona-crossings-shift-to-south-texas.html?pagewanted=1&r=0>.

the AI Justice website, draft analysis of the information and disseminate it to other immigration advocacy groups and potentially to members of Congress.

**ii. Disclosure of the Information Is Not Primarily in the Commercial Interest of the Requester**

AI Justice is a 501(c)(3), tax-exempt, not-for-profit, charitable legal services organization. AI Justice's work encompasses advocating for the basic human rights of immigrants through direct representation, policy reform, impact litigation, and public education. Therefore, AI Justice has no commercial interest that could be furthered by any FOIA request. Immigration attorneys, non-citizens and any other interested member of the public may obtain information about DHS and ICE policies and practices on AI Justice's frequently updated website. As stated above, AI Justice seeks the requested information for the purpose of disseminating it to members of the public who access AI Justice's website and not for the purpose of commercial gain.

Please inform me in advance if the charges for this FOIA production will exceed \$50.00.

Thank you in advance for your response to this request within twenty working days, pursuant to FOIA requirements. *See* 5 U.S.C. § 552(a)(6)(A)(i). Should you have any questions or concerns, please feel free to contact me at (305) 570-8925, or via email at [jsantos@aijustice.org](mailto:jsantos@aijustice.org).

Sincerely,

Jennie Santos-Bourne  
Litigation Attorney

# Exhibit B



**From:** US DHS Immigration and Customs Enforcement FOIA Office [mailto:ice-foia@dhs.gov]  
**Sent:** Wednesday, February 08, 2017 1:12 PM  
**To:** Jennie Santos <jsantos@aijustice.org>  
**Subject:** ICE FOIA Request 2017-ICFO-15091

February 08, 2017

Jennie Santos-Bourne  
Americans for Immigrant Justice  
3000 Biscayne Blvd., Suite 400  
Miami, FL 33137

**RE: ICE FOIA Case Number 2017-ICFO-15091**

Dear Ms. Santos-Bourne:

This acknowledges receipt of your Freedom of Information Act (FOIA) request to U.S. Immigration and Customs Enforcement (ICE), dated January 18, 2017, and to your request for a waiver of all assessable FOIA fees. Your request was received in this office on January 18, 2017. Specifically, you requested disclosure of any and all records that were authored, prepared, received, collected and/or maintained by or transmitted to the U.S. Department of Homeland Security (DHS) and/or U.S. Immigration and Customs Enforcement (ICE) that describe, refer or relate to DHS and/or ICE's contractual or other relationship with the Atlantic Shores Hospital (ASH) located in Fort Lauderdale, FL and/or the GEO Group, Inc. (GEO) relating to any detention or processing facility located in Florida (see request for 10 specific details).

Due to the increasing number of FOIA requests received by this office, we may encounter some delay in processing your request. Per Section 5.5(a) of the DHS FOIA regulations, 6 C.F.R. Part 5, ICE processes FOIA requests according to their order of receipt. Although ICE's goal is to respond within 20 business days of receipt of your request, the FOIA does permit a 10-day extension of this time period. As your request seeks numerous documents that will necessitate a thorough and wide-ranging search, ICE will invoke a 10-day extension for your request, as allowed by Title 5 U.S.C. § 552(a)(6)(B). If you care to narrow the scope of your request, please contact our office. We will make every effort to comply with your request in a timely manner.

After thoroughly reviewing your letter and request for fee waiver, I have determined that you have not presented a convincing argument that Americans for Immigrant Justice is entitled to a blanket waiver of applicable fees.

The DHS FOIA Regulations at 6 CFR § 5.11(k)(2) set forth six factors to examine in determining whether the applicable legal standard for a fee waiver has been met. We will consider these factors in our evaluation of your request for a fee waiver:

- (1) Whether the subject of the requested records concerns "the operations or activities of the government";
- (2) Whether the disclosure is "likely to contribute" to an understanding of government operations or activities;
- (3) Whether disclosure of the requested information will contribute to the understanding of the public at large, as opposed to the individual understanding of the requestor or a narrow segment of interested persons;
- (4) Whether the contribution to public understanding of government operations or activities will be "significant";
- (5) Whether the requestor has a commercial interest that would be furthered by the requested disclosure; and
- (6) Whether the magnitude of any identified commercial interest to the requestor is sufficiently large in comparison with the public interest in disclosure, that disclosure is primarily in the commercial interest of the requestor.

As a requester, you bear the burden under FOIA of showing that the fee waiver requirements have been met. Based on my review of your January 18, 2017 letter and for the reasons stated herein, I have determined that your fee waiver request is deficient because your request did not satisfy factors 4, 5, and 6. Since your request for a fee waiver has failed to satisfy each of the required factors, I am denying your fee waiver request.

Provisions of the FOIA allow us to recover part of the cost of complying with your request. We shall charge you for records in accordance with the DHS Interim FOIA regulations as they apply to non-commercial requesters. As a non-commercial requester, you will be charged 10 cents per page for duplication; the first 100 pages are free, as are the first two hours of search time, after which you will pay the per quarter-hour rate (\$4.00 for clerical personnel, \$7.00 for professional personnel, \$10.25 for managerial personnel) of the searcher. We will construe the submission of your request as an agreement to pay up to \$25.00. You will be contacted before any further fees are accrued.

If you are not satisfied with the response to this request, you have the right to appeal following the procedures outlined in the DHS regulations at 6 C.F.R. § 5.9. Should you wish to do so, you must send your appeal and a copy of this letter, within 90 days of the date of this letter, to:

U.S. Immigration and Customs Enforcement  
Office of the Principal Legal Advisor  
U.S. Department of Homeland Security  
500 12th Street, S.W., Mail Stop 5900  
Washington, D.C. 20536-5900

Your envelope and letter should be marked "FOIA Appeal." Copies of the FOIA and DHS regulations are available at [www.dhs.gov/foia](http://www.dhs.gov/foia).

ICE has queried the appropriate program offices within ICE for responsive records. If any responsive records are located, they will be reviewed for determination of releasability. Please be assured that one of the processors in our office will respond to your request as expeditiously as possible. We appreciate your patience as we proceed with your request.

Your request has been assigned reference number **2017-ICFO-15091**. Please refer to this identifier in any future correspondence. To check the status of an ICE FOIA/PA request, please visit

<http://www.dhs.gov/foia-status>. Please note that to check the status of a request, you must enter the 2016-ICFO-XXXXX or 2017-ICFO-XXXXX tracking number. If you need any further assistance or would like to discuss any aspect of your request, please contact the FOIA office. You may send an e-mail to [ice-foia@ice.dhs.gov](mailto:ice-foia@ice.dhs.gov), call toll free (866) 633-1182, or you may contact our FOIA Public Liaison in the same manner. Additionally, you have a right to right to seek dispute resolution services from the Office of Government Information Services (OGIS) which mediates disputes between FOIA requesters and Federal agencies as a non-exclusive alternative to litigation. If you are requesting access to your own records (which is considered a Privacy Act request), you should know that OGIS does not have the authority to handle requests made under the Privacy Act of 1974. You may contact OGIS as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, e-mail at [ogis@nara.gov](mailto:ogis@nara.gov); telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

Regards,

ICE FOIA Office  
Immigration and Customs Enforcement  
Freedom of Information Act Office  
500 12th Street, S.W., Stop 5009  
Washington, D.C. 20536-5009  
Telephone: 1-866-633-1182  
Visit our FOIA website at [www.ice.gov/foia](http://www.ice.gov/foia)

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# Exhibit C

**From:** Coker, William [mailto:William.Coker@ice.dhs.gov] On Behalf Of ICE-FOIA  
**Sent:** Thursday, April 27, 2017 1:37 PM  
**To:** Jennie Santos <jsantos@aijustice.org>  
**Subject:** RE: ICE FOIA Request 2017-ICFO-15091

Hi Ms. Santos,

Your request status is request for documents sent. I cannot give a specific date on completion but your request is being processing.

Sincerely,

ICE FOIA

**From:** Jennie Santos [mailto:jsantos@aijustice.org]  
**Sent:** Wednesday, April 26, 2017 5:01 PM  
**To:** US DHS Immigration and Customs Enforcement FOIA Office  
**Subject:** RE: ICE FOIA Request 2017-ICFO-15091

Greetings,

I am writing to request information regarding the status of my FOIA request. Your correspondence below dated February 8, 2017 indicated that a 10-day extension would be invoked, however, more than 60 additional days have passed without any production or other response. Please advise when I can expect production.

# Exhibit D

**From:** ice-foia@dhs.gov [mailto:ice-foia@dhs.gov]  
**Sent:** Friday, September 29, 2017 7:44 AM  
**To:** Jennie Santos <jsantos@aijustice.org>  
**Subject:** ICE FOIA Response for 2017-ICFO-15091

Ms. Santos-Bourne,

ICE's final response to your FOIA request, 2017-ICFO-15091, for disclosure of any and all records that were authored, prepared, received, collected and/or maintained by or transmitted to the U.S. Department of Homeland Security (DHS) and/or U.S. Immigration and Customs Enforcement (ICE) that describe, refer or relate to DHS and/or ICE's contractual or other relationship with the Atlantic Shores Hospital (ASH) located in Fort Lauderdale, FL and/or the GEO Group, Inc. (GEO) relating to any detention or processing facility located in Florida (see request for 10 specific details) is attached.

Please note that the attachment may be password protected. If you are prompted to enter a password when opening the attachment and you did not receive a password it may be in your junk/spam folder.

Sincerely,  
ICE FOIA

NOTICE: This electronic message transmission was sent by an attorney or at the direction of an attorney and contains information which may be confidential and/or privileged. The electronic message and any attachments are confidential property of the sender. The information contained herein is intended only for the use of the intended recipient(s). Interception, copying, accessing, disclosure, distribution, or use of this message or any attachments by any person other than an intended recipient is prohibited.



**2017-ICFO-15091.zip**  
720K

*Freedom of Information Act Office*

U.S. Department of Homeland Security  
500 12<sup>th</sup> St SW, Stop 5009  
Washington, DC 20536



U.S. Immigration  
and Customs  
Enforcement

September 28, 2017

Jennie Santos-Bourne  
Americans for Immigrant Justice  
3000 Biscayne Blvd., Suite 400  
Miami, FL 33137

**RE: ICE FOIA Case Number 2017-ICFO-15091**

Dear Ms. Santos-Bourne:

This letter is the final response to your Freedom of Information Act (FOIA) request to U.S. Immigration and Customs Enforcement (ICE), dated January 18, 2017. You are requesting the disclosure of any and all records that were authored, prepared, received, collected and/or maintained by or transmitted to the U.S. Department of Homeland Security (DHS) and/or U.S. Immigration and Customs Enforcement (ICE) that describe, refer or relate to DHS and/or ICE's contractual or other relationship with the Atlantic Shores Hospital (ASH) located in Fort Lauderdale, FL and/or the GEO Group, Inc. (GEO) relating to any detention or processing facility located in Florida (see request for 10 specific details).

ICE has considered your request under the FOIA, 5 U.S.C. § 552.

A search of the ICE Office of Acquisition for records responsive to your request produced 67 pages that are responsive to your request. ICE has determined that 67 pages will be released in their entirety; ICE has claimed no deletions or exemptions.

If you are not satisfied with the response to this request, you have the right to appeal following the procedures outlined in the DHS regulations at 6 C.F.R. § 5.9. Should you wish to do so, you must send your appeal and a copy of this letter, within 90 days of the date of this letter, to:

U.S. Immigration and Customs Enforcement  
Office of the Principal Legal Advisor  
U.S. Department of Homeland Security  
500 12th Street, S.W., Mail Stop 5900  
Washington, D.C. 20536-5900

Your envelope and letter should be marked "FOIA Appeal." Copies of the FOIA and DHS regulations are available at [www.dhs.gov/foia](http://www.dhs.gov/foia).

Provisions of the FOIA and Privacy Act allow us to recover part of the cost of complying with your request. In this instance, because the cost is below the \$14 minimum, there is no charge.<sup>1</sup>



If you need any further assistance or would like to discuss any aspect of your request, please contact the FOIA office and refer to FOIA case number **2017-ICFO-15091**. You may send an e-mail to [ice-foia@ice.dhs.gov](mailto:ice-foia@ice.dhs.gov), call toll free (866) 633-1182, or you may contact our FOIA Public Liaison, Fernando Pineiro, in the same manner. Additionally, you have a right to seek dispute resolution services from the Office of Government Information Services (OGIS) which mediates disputes between FOIA requesters and Federal agencies as a non-exclusive alternative to litigation. If you are requesting access to your own records (which is considered a Privacy Act request), you should know that OGIS does not have the authority to handle requests made under the Privacy Act of 1974. You may contact OGIS as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, e-mail at [ogis@nara.gov](mailto:ogis@nara.gov); telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

Sincerely,

*Catrina M. Pavlik-Keenan*  
for

Catrina M. Pavlik-Keenan  
FOIA Officer

Enclosure(s): Responsive Records, 67 Pages

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<sup>1</sup> 6 CFR § 5.11(d)(4).