

# Exhibit 4

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Via E-mail: foia@hq.dhs.gov  
Nicole Barksdale-Perry  
Angela Washington, Public Liaison  
The Privacy Office  
U.S. Department of Homeland Security  
245 Murray Lane SW, Stop 0655  
Washington, D.C. 20528&0655

Via E-mail: ice-foia@dhs.gov  
Catrina Pavlik-Keenan  
Fernando Pineiro  
U.S. Immigration and Customs Enforcement  
Freedom of Information Act Office  
500 12th Street, SW, Stop 5009  
Washington, D.C. 20536-5009

In Re: Freedom of Information Act Request to DHS and ICE

Dear Ms. Perry, Ms. Washington, Ms. Pavlik-Keenan, and Mr. Pineiro,

This is a request under the Freedom of Information Act to both the U.S. Department of Homeland Security ("DHS") and U.S. Immigration and Customs Enforcement ("ICE").

I request any and all written or electronic documentation as follows:

1. Documentation regarding any contract or other agreements between ICE and private contractor CoreCivic to operate the T. Don Hutto Residential Center in Taylor, since Williamson County, Texas, ended its IGSA agreement.

Such contractual agreement was referenced by ICE spokesperson Nina Pruneda in the following article: <https://www.kxan.com/news/local/williamson-county/williamson-county-agreement-with-ice-detention-center-ends-thursday/1740684523>. However, this request is not limited to references made by Ms. Pruneda to the press.

2. Documentation regarding the operation of the T. Don Hutto Residential Center, beyond Jan. 31, 2019.
3. Documentation regarding the cancellation of the IGSA by Williamson County, Texas and plans to continue the operation of the T. Don Hutto facility.
4. Documentation regarding compliance with the Competition in Contracting Act, including Justification for Other than Full and Open Competition, in order to enter into a direct contractual agreement with CoreCivic.

#### Request for Fee Waiver

I agree to pay search, duplication and review fees up to \$100. If the fees will amount to more than \$100, I request a fee waiver pursuant to 5 U.S.C. §552(a)(4)(A)(iii) ("Documents shall be furnished without any

charge ... if disclosure of the information is in the public interest because it is likely to contribute significantly to the public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester.”).

A fee waiver would fulfill Congressional intent as the information sought in this FOIA will be utilized for noncommercial purposes in the public interest. See *Judicial Watch, Inc. v. Rossoti*, 326 F.3d 1309, 1312 (D.C. Cir. 2003) (Congress intended the FOIA to be construed broadly to favor fee waiver for noncommercial requests).

The requested information will contribute to the public understanding of administrative efforts connected to the immigration detention and the asylum process, which is an issue of concern both in the Austin, Texas area and nationally. It will assist the public and a broad swath of entities, including Grassroots Leadership, advocate for reforms to that process to the appropriate entities and agencies in a timely manner.

Grassroots Leadership has the capacity to disseminate the information obtained through this request to the public. As an example of that capacity, the information obtained from a prior FOIA request regarding the arrests of immigrants in the Austin, Texas, area is available online on the Grassroots Leadership website at <https://grassrootsleadership.org/in&the&news/2018/ice&arrested&nearly&three&times&many&immigran&ts&during&last&year&s&austin&raid>. Grassroots Leadership routinely disseminates information on our website, and on social media, with an audience of 6,948 on Twitter and 10,458 on Facebook. Further intended means of distribution of the requested information will include collaboration with and publication by partnering organizations and outreach to government officials, legislators and the media.

Finally, the contribution to public understanding through this request is “significant.” See *Forest Guardian v U.S. Department of Justice*, 416 F. 3d 1173, 1179 (10th Cir. 2005). Requests are significant if the requested information is new and if the disclosure will increase the public understanding of the operations or activities of a government agency. *Id.* They are also significant if the information is not readily available to the public from other sources. *Id.* There is very little public information available regarding the information sought in this request. The requested information will thus significantly contribute to public understanding of these important issues.

Thank you for your prompt consideration of this request. If you have any questions regarding this request, please contact me directly.

Sincerely,



Bethany Carson  
Immigration Researcher and Organizer  
Grassroots Leadership