

# **EXHIBIT D**



AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION

Texas

June 26, 2019

*Sent via Email*

U.S. Immigration and Customs Enforcement  
Office of the Principal Legal Advisor  
U.S. Department of Homeland Security  
500 12<sup>th</sup> Street, S.W., Mail Stop 5900  
Washington, D.C. 20536-5900  
E-mail: [gildfoiaappeals@ice.dhs.gov](mailto:gildfoiaappeals@ice.dhs.gov)

**FREEDOM OF INFORMATION ACT (FOIA) APPEAL**

**Re: FOIA Request No. 2019-ICFO-35986 Regarding a Worksite Enforcement Operation in Allen, Texas**

To Whom It May Concern:

This letter constitutes an appeal pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. §552(a)(6)(A), concerning the refusal of the Bureau of Immigration and Customs Enforcement ("ICE") to disclose certain documents within its control. This appeal is on behalf of the ACLU Foundation of Texas, Inc. ("ACLU").

On April 16, 2019, ACLU submitted a FOIA request to the ICE FOIA Office for records relating to a worksite enforcement operation conducted by ICE and Homeland Security Investigations ("HSI") on April 3, 2019 at CVE Technology Group, Inc. ("CVE") in Allen, Texas. *See Exhibit A.* Local and national media reported on the enforcement action, and ICE itself publicized the enforcement action on its website. *See* ICE executes federal criminal search warrant in North Texas, available at <https://www.ice.gov/news/releases/ice-executes-federal-criminal-search-warrant-north-texas>. ICE reported that "special agents with [ICE] Homeland Security Investigations (HSI) executed criminal search warrants at CVE Technology Group Inc. (CVE), and four of CVE's staffing companies." *Id.* According to ICE, "[t]his ongoing investigation began after HSI received multiple tips that the company may have knowingly hired illegal aliens," and the enforcement action was a culmination of "an audit of CVE's I-9 Forms, which confirmed numerous hiring irregularities." *Id.* ICE further disclosed that this operation was part of a broader "two-phase operation" under the effort to "use[] I-9 audits to create a culture of

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compliance among employers.” *Id.*

The ACLU request sought copies of all administrative and criminal warrants “**issued and served** on an agent of CVE or its staffing agencies related to the enforcement operation.” Exhibit A (emphasis added).

Notwithstanding the simplicity and unobjectionable nature of ACLU’s request, ICE responded on May 23, 2019, to claim that “the information you are requesting is withholdable in its entirety.” Referring to 5 U.S.C. §552(b)(7)(A), ICE asserted “that the information you are seeking relates to ongoing law enforcement investigations” and the release of *any* of the records requested “prior to completion[] could reasonably be expected to interfere with law enforcement proceedings and final agency actions related to those proceedings.” *See* Exhibit B.<sup>1</sup>

ICE’s categorical withholding of records responsive to ACLU’s request violates FOIA and the DHS regulations implementing FOIA. We appeal ICE’s FOIA determination on distinct grounds.<sup>2</sup>

First, ICE failed to fulfill its legal duty to disclose responsive records that are not covered by any exception. ICE has not demonstrated that disclosure of warrants “issued and served” could reasonably be expected to interfere with enforcement proceedings. Indeed, ICE cannot make such a showing. ACLU has requested copies only of *executed* warrants, or warrants that already have been disclosed to the entities purportedly subject to law enforcement proceedings. The ACLU request does not include the underlying warrant materials, or any warrants that have not yet been issued or that were not served. There is no reasonable basis for ICE to assert that such documents are confidential, or that disclosure of these documents would interfere with their investigation. It is unreasonable that any, let alone all, of the records requested can be withheld. As described in ACLU’s request, the information requested is of substantial value to the public debate regarding the appropriateness of ICE worksite enforcement operations and the manner in which these operations have been conducted. ICE must honor its legal duty to disclose such records.

Second, even to the extent certain *documents* can be withheld, ICE has disregarded its duty to provide segregable portions of responsive records. “Any reasonably segregable portion of a

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<sup>1</sup> ICE also suggests that “once all pending matters are resolved and FOIA Exemption 7(A) is no longer applicable, there may be other exemptions which could protect certain information from disclosure.” However, ICE’s current withholding neither relies upon other exemptions nor identifies specifically a basis on which such other exemptions may be claimed. To the extent that the ICE denial letter constitutes a decision to withhold responsive documents based on other FOIA exemptions, we also appeal that decision.

<sup>2</sup> In objecting on these bases, we do not concede that any of the information withheld is properly subject to the exemption claimed by ICE, or any other exemptions in the FOIA. We reserve the right to object on additional bases once ICE complies with its obligations to provide information, including the scope and adequacy of the search conducted, responsive documents, and a particular description of exemptions claimed as applied to particular records.

record shall be provided to any person requesting such record after deletion of the portions which are exempt under this subsection. 5 U.S.C. § 552(b). It is not plausible that no portion of the records within the scope of ACLU's request can be disclosed. For example, ICE not only has revealed the issuance and service of warrants, it has shared photographs and video of the enforcement action purportedly pursuant to these warrants.<sup>3</sup> It is not reasonable that all records responsive to ACLU's request must be withheld in their entirety.

Third, ICE's determination to paint with a broad and opaque brush violates not only FOIA, but ICE's own regulations. FOIA requires that agencies coordinate searches reasonably calculated to uncover all relevant documents, and, to the extent uncovered documents are exempt, to describe the documents withheld and the basis for withholding. ICE has not submitted that it has conducted proper searches, has not identified the documents uncovered, and has not explained the particular bases for withholding particular records. DHS regulations further provide that when a component of the DHS denies a FOIA request, it must provide "[a]n estimate of the volume of records or information withheld, in number of pages or in some other form of estimate." 6 C.F.R. § 5.6(c)(3). ICE has not provided such an estimate, and has not disclosed any documents that might reveal such a volume.

We therefore appeal ICE's withholding determination. In addition to the disclosure of records, we request that ICE provide information regarding the adequacy of the search conducted, a complete list of documents covered by our FOIA request as well as a specific indication of what material is being withheld based on which specific exemptions.

At this time, ICE has not responded to ACLU's request for a waiver of fees or expedited processing, and does not suggest that fees are outstanding. Exhibit B ("Provisions of FOIA allow DHS to charge for processing fees, up to \$25, unless you seek a waiver of fees. In this instance, because the cost is below the \$25 minimum, there is no charge."). ACLU incorporates both requests here. Exhibit A at 4-7.

I look forward to a written response by the close of the statutory period, which is within twenty working days of your receipt of this appeal letter. *See* 5 U.S.C. § 552(a)(6)(A)(ii). We reserve the right to a judicial appeal as permitted by law. Thank you for your prompt attention to this matter. If you have any questions, please contact me by electronic mail at [ddonatti@aclutx.org](mailto:ddonatti@aclutx.org).

Respectfully,



David Donatti  
American Civil Liberties Union of Texas  
P.O. Box 8306  
Houston, TX 77288-8306

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<sup>3</sup> ICE executes federal criminal search warrant in North Texas, April 3, 2019, available at <https://www.ice.gov/news/releases/ice-executes-federal-criminal-search-warrant-north-texas>.





AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION

Texas

April 16, 2019

*Sent via Email*

Jimmy Wolfrey  
The Privacy Office  
U.S. Department of Homeland Security  
245 Murray Lane SW  
STOP-0655  
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E-mail: [foia@hq.dhs.gov](mailto:foia@hq.dhs.gov)

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Washington, D.C. 20536-5009  
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**Re: Expedited Request for Information under Freedom of Information Act**

To Whom It May Concern:

The ACLU Foundation of Texas, Inc. (“ACLU”)<sup>1</sup> makes this request for information under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552 *et seq.*, for records related to a worksite enforcement operation conducted on April 3, 2019 by U.S. Immigration and Customs Enforcement (“ICE”) and Homeland Security Investigations (“HSI”) at CVE Technology Group, Inc. (“CVE”) located at 915 Enterprise Blvd, Allen, Texas.

The worksite enforcement operation at CVE resulted in the administrative arrest of “more than

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<sup>1</sup> The ACLU Foundation of Texas, a 501(c)(3) organization, is the state’s preeminent civil rights organization, dedicated to protecting and defending the individual rights and liberties that the Constitution and laws of the United States guarantee for everyone in Texas, regardless of immigration or refugee status. The ACLU provides legal representation free of charge to individuals and organizations in civil rights and civil liberties cases, educates the public about the civil rights and civil liberties implications of pending and proposed state and federal legislation, and provides analyses of pending and proposed litigation.

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280 CVE company employees” pursuant to “criminal search warrants at CVE . . . and four of CVE’s staffing companies.”<sup>2</sup> According to ICE, “[t]his HSI-led enforcement action was coordinated with federal, state and local counterparts including the U.S. Attorney’s Office for the Eastern District of Texas, and ICE Enforcement and Removal Operations.”<sup>3</sup>

By this Request, the ACLU seeks:

1. Copies of all administrative warrants issued and served on an agent of CVE or its staffing agencies related to the enforcement operation;
2. Copies of all criminal warrants issued and served on an agent of CVE or its staffing agencies related to enforcement operation;
3. If any records responsive or potentially responsive to this request have been destroyed, our request includes, but is not limited to, records relating or referring to the destruction of those records, including the events leading to the destruction of those records.

Agencies have an obligation to search all offices that are reasonably expected to produce any relevant information. *See, e.g., Am. Immigration Council v. U.S. Dep’t of Homeland Sec.*, 950 F. Supp. 2d 221, 230 (D.D.C. 2013) (“ICE would, at a minimum, have to aver that it has searched all files likely to contain relevant documents.”).

With respect to the form of production, *see* 5 U.S.C. § 552(a)(3)(B), the ACLU requests that responsive electronic records be provided electronically in their native format. If such form is not possible, the ACLU requests that the records be provided electronically in a text-searchable, static-image format (PDF), in the best image quality in DHS, HSI, and ICE’s possession, and that the records be provided in separate Bates-stamped files.

### **Fee Waiver Request**

The ACLU respectfully seeks a waiver of all costs associated with a response to this FOIA request. Disclosure of the requested records “is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government,” and the ACLU does not have a commercial interest in the records requested. 5 U.S.C. § 552(a)(4)(A)(iii)

Disclosure of the requested information is in the public interest because it is likely to contribute

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<sup>2</sup> ICE, *ICE executes federal criminal search warrant in North Texas*, April 3, 2019, available at <https://www.ice.gov/news/releases/ice-executes-federal-criminal-search-warrant-north-texas> (last visited April 11, 2019).

<sup>3</sup> *Id.*

significantly to public understanding of the operations or activities of the government regarding high-visibility worksite enforcement actions. The enforcement action has garnered significant national attention.<sup>4</sup> It is the largest workplace raid in a decade, and affected employees from at least 15 countries, including El Salvador, Honduras, Mexico, Nigeria and Venezuela.<sup>5</sup>

Workplace raids are more common under President Donald Trump's administration, and the population of detained immigrants is at its highest levels in history.<sup>6</sup> The investigation of CVE and its staffing companies purportedly fits within a broader "2-phase nationwide operation," which involved the delivery of "more than 5,200 I-9 audit notices to businesses across the [United States]" in 2018.<sup>7</sup> As communities of immigrants and communities of color live in fear, the records requested will invaluablely contribute to the public discussion over immigrants' rights and law-enforcement activities. The records subject to this request are important to the public and cannot otherwise be obtained through public searches.

The records requested, while in furtherance of the ACLU's social and educational missions, are not of commercial interest to the ACLU. A 501(c)(3) organization, the ACLU is the state's preeminent civil rights organization, dedicated to protecting and defending the individual rights and liberties that the Constitution and laws of the United States guarantee for everyone in Texas, regardless of immigration or refugee status. The ACLU provides legal representation free of charge to individuals and organizations in civil rights and civil liberties cases, educates the public about civil rights and civil liberties issues, and provides analyses of pending and proposed litigation. The ACLU has no commercial interest in these records, and is requesting them for educational and advocacy-related purposes. The ACLU will disseminate any information it receives to the public free of charge. *See* 6 C.F.R. § 5.11(k).

FOIA is intended to "ensure an informed citizenry, vital to the functioning of a democratic society, needed to check against corruption and hold the governors accountable to the governed." *NLRB v. Robbins Tire & Rubber Co.*, 437 U.S. 214, 242 (1978). The provisions for waiver of fees under FOIA are to be "liberally construed in favor of waivers for noncommercial requesters." *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1312 (D.C. Cir. 2003) (internal quotation marks and citation omitted). These provisions are satisfied in this instance.

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<sup>4</sup> *See, e.g.*, David Warren and Jake Bleiberg (AP), *Texas ICE raid the latest in series of enforcement actions*, WASH. POST (April 4, 2019), [https://www.washingtonpost.com/business/texas-ice-raid-the-latest-in-series-of-enforcement-actions/2019/04/04/7cc7a3e2-5716-11e9-aa83-504f086bf5d6\\_story.html?utm\\_term=.d0898c818909](https://www.washingtonpost.com/business/texas-ice-raid-the-latest-in-series-of-enforcement-actions/2019/04/04/7cc7a3e2-5716-11e9-aa83-504f086bf5d6_story.html?utm_term=.d0898c818909) (last visited April 11, 2019); *ICE agents arrest 280 people at tech repair company in Texas*, CBS NEWS (April 5, 2019), <https://www.cbsnews.com/news/ice-raid-allen-texas-280-arrested-at-cve-technology-group-largest-operation-in-10-years/> (last visited April 11, 2019).

<sup>5</sup> *See* Sarah Mervosh, *Immigration Authorities Arrest More than 280 in Texas in Largest Workplace Raid in a Decade*, N.Y. Times (April 4, 2019), <https://www.nytimes.com/2019/04/04/us/texas-immigration-raid.html> (last visited April 12, 2019).

<sup>6</sup> *See* Atticus Ballesteros, *The Interior Wall: Immigration Detention Reaches Record High Levels*, Capital Area Immigrants' Rights Coalition (CAIR) (March 26, 2019), <https://www.caircoalition.org/20190326/interior-wall-immigration-detention-reaches-record-high-levels>.

<sup>7</sup> ICE, *ICE delivers more than 5,200 I-9 audit notices to businesses across the US in 2-phase nationwide operation*, July 24, 2018, available at <https://www.ice.gov/news/releases/ice-delivers-more-5200-i-9-audit-notices-businesses-across-us-2-phase-nationwide> (last visited April 11, 2019).

### **III. Application for Expedited Processing**

The ACLU further requests expedited processing pursuant to 5 U.S.C. § 552(a)(6)(E).<sup>8</sup> There is a “compelling need” for these records, as defined in the statute, because the ACLU is primarily engaged in disseminating information and there is “urgency to inform the public concerning actual or alleged Federal Government activity.” 5 U.S.C. 552(a)(6)(E)(v)(II).

*A. The ACLU is an organization primarily engaged in disseminating information in order to inform the public about actual or alleged government activity.*

The ACLU is “primarily engaged in disseminating information” within the meaning of the statute. 5 U.S.C. §552(a)(6)(E)(v)(II).<sup>9</sup> Obtaining information about government activity, analyzing that information, and widely publishing and disseminating that information to the press and public are critical and substantial components of the ACLU’s work and are among its primary activities. *See ACLU v. U.S. Dep’t of Justice*, 321 F. Supp. 2d 24, 29 n.5 (D.D.C. 2004) (finding non-profit public interest group that “gathers information of potential interest to a segment of the public, uses its editorial skills to turn the raw material into a distinct work, and distributes that work to an audience” to be “primarily engaged in disseminating information”).<sup>10</sup>

Part of the organizational mission of the ACLU is to “work daily...in the community to defend and preserve [] individual rights and liberty,”<sup>11</sup> work which entails public education. The ACLU serves as an important resource to immigrant communities, advocacy groups, legal service organizations, and the general public. As part of its work, ACLU regularly creates and disseminates works in the form of presentations, reports, articles, interviews, testimony, social media, and blog posts to educate the public about the activities of the United States government.<sup>12</sup> The ACLU regularly publishes “know your rights” materials, fact sheets, and educational brochures and pamphlets designed to educate the public about civil liberties issues and government policies that implicate civil rights and civil liberties, including the key issue of immigrants’ rights.<sup>13</sup>

The ACLU publishes, analyzes, and disseminates information through its heavily visited website, [www.aclutx.org](http://www.aclutx.org). It publishes a widely-read blog where original editorial content reporting on and analyzing civil rights and civil liberties news is posted daily, regularly issues press releases

<sup>8</sup> See also 6 C.F.R. § 5.5(e)(1).

<sup>9</sup> See also 6 C.F.R. § 5.5(e)(1)(ii).

<sup>10</sup> Courts have often found that organizations engaged in civil-rights advocacy and information-dissemination are “primarily engaged in disseminating information.” *Leadership Conference on Civil Rights v. Gonzales*, 404 F. Supp. 2d 246, 260 (D.D.C. 2005); see also, e.g., *ACLU*, 321 F. Supp. 2d at 29 n.5; *Elec. Privacy Info. Ctr. v. U.S. Dep’t of Defense*, 241 F. Supp. 2d 5, 11 (D.D.C. 2003).

<sup>11</sup> *About Us*, ACLU Tex., <https://www.aclutx.org/en/about/about-us> (last visited April 11, 2019).

<sup>12</sup> See generally *Issues*, ACLU Tex., <https://www.aclutx.org/en/issues/> (last visited April 11, 2019).

<sup>13</sup> See generally *Know Your Rights*, ACLU Tex., <https://www.aclutx.org/en/know-your-rights/> (last visited April 11, 2019).

to call attention to news and issues affecting the public,<sup>14</sup> and creates and disseminates original editorial and education content on civil rights and civil liberties news through multi-media projects, including videos, podcasts, and interactive features.<sup>15</sup> The ACLU's website addresses civil rights and civil liberties issues in depth, provides features on civil rights and civil liberties issues in the news, and contains many thousands of documents relating to the issues on which the ACLU is focused. The ACLU's website also serves as a clearinghouse for news about ACLU cases, as well as analysis about case developments, and an archive of case-related documents. Through these pages, and with respect to each specific civil liberties issue, the ACLU provides the public with educational material, recent news, analyses of relevant Congressional or executive branch action, government documents obtained through FOIA requests, and further in-depth analytic and educational multi-media features.

The ACLU plans to analyze, publish, and disseminate to the public the information gathered through this Request. The records requested are not sought for commercial use and the requesters plan to disseminate the information disclosed as a result of this Request to the public at no cost.

*B. The records sought are urgently needed to inform the public about actual or alleged government activities and practices in execution of immigration enforcement operations.*

These records are urgently needed to inform the public about actual or alleged government activity. *See* 5 U.S.C. § 552(a)(6)(E)(v)(II).<sup>16</sup> Specifically, as discussed above, the requested records provide information about the largest workplace raid in a decade, affecting a diverse population in Texas, including U.S. Citizens, lawful residents, immigrants, their communities, and families. The records requested are critical to understanding ICE policies and practices during the enforcement operation and the civil and constitutional implications of those policies and practices. As workplace raids are on the rise, and the investigation of CVE and its staffing companies is purportedly part of a campaign whereby such enforcement operations may continue to occur, the records requested may provide vital information about government policies and practices.

Given the forgoing, and pursuant to the applicable statutes and regulations, the ACLU requests a determination regarding expedited processing within 10 days. *See* 5 U.S.C. § 552(a)(6)(E)(ii); C.F.R. § 5.5(e)(4).

If the request is denied in whole or in part, the ACLU asks that you justify all deletions by reference to specific FOIA exemptions. The ACLU expects the release of all segregable portions of otherwise exempt material. The ACLU reserves the right to appeal a decision to withhold any information.

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<sup>14</sup> *See* Press Releases, ACLU Tex., <https://aclutx.org/en/press-releases/> (last visited April 11, 2019).

<sup>15</sup> *See* *aclutx*, Youtube, <https://www.youtube.com/user/aclutx/> (last visited April 11, 2019).

<sup>16</sup> *See also* 6 C.F.R. § 5.5(e)(1)(ii).



**Conclusion**

Thank you for your prompt attention to this matter. We prefer to receive these records electronically, and can receive email at [bracruz@aclutx.org](mailto:bracruz@aclutx.org) and [ddonatti@aclutx.org](mailto:ddonatti@aclutx.org). If the records cannot be sent electronically, by post to

American Civil Liberties Union of Texas  
Attn: David Donatti  
P.O Box 8306  
Houston, TX 77288-8306  
[ddonatti@aclutx.org](mailto:ddonatti@aclutx.org)

I affirm that the information provided supporting the request for expedited processing is true and correct to the best of my knowledge and belief. *See* 5 U.S.C. § 552(a)(6)(E)(vi).

Respectfully,

A handwritten signature in blue ink that reads "David Donatti". The signature is written in a cursive style with a large, stylized "D" and "H".

David Donatti  
American Civil Liberties Union of Texas  
P.O Box 8306  
Houston, TX 77288-8306

Office of Information Governance and Privacy

U.S. Department of Homeland Security  
500 12<sup>th</sup> St., SW  
Washington, D.C. 20536



U.S. Immigration  
and Customs  
Enforcement

May 23, 2019

David Donatti  
ACLU of Texas  
P.O. Box 8306  
Houston, TX 77288-8306

**RE: ICE FOIA Case Number 2019-ICFO-35986**

Dear Mr. Donatti:

This letter is the final response to your Freedom of Information Act (FOIA) request to U.S. Immigration and Customs Enforcement (ICE), dated April 16, 2019. You have requested for records related to a worksite enforcement operation conducted on April 3, 2019 by U.S. Immigration and Customs Enforcement ("ICE") and Homeland Security Investigations ("HSI") at CVE Technology Group, Inc. ("CVE") located at 915 Enterprise Blvd, Allen, Texas.

1. Copies of all administrative warrants issued and served on an agent of CVE or its staffing agencies related to the enforcement operation;
2. Copies of all criminal warrants issued and served on an agent of CVE or its staffing agencies related to enforcement operation;
3. If any records responsive or potentially responsive to this request have been destroyed, our request includes, but is not limited to, records relating or referring to the destruction of those records, including the events leading to the destruction of those records..

Due to the open status of ongoing law enforcement investigations, ICE has determined that the information you are requesting is withholdable in its entirety pursuant to Title 5 U.S.C. § 552 (b)(7)(A). FOIA Exemption 7(A) protects from disclosure records or information compiled for law enforcement purposes, the release of which could reasonably be expected to interfere with enforcement proceedings. ICE has determined that the information you are seeking relates to ongoing law enforcement investigations. Therefore, ICE is withholding all records, documents, and/or other material, which if disclosed prior to completion, could reasonably be expected to interfere with law enforcement proceedings and final agency actions related to those proceedings. Please be advised that once all pending matters are resolved and FOIA Exemption 7(A) is no longer applicable, there may be other exemptions which could protect certain information from disclosure, such as FOIA Exemptions 6, 7(C), 7(D), 7(E) and/or 7(F).

You have a right to appeal the above withholding determination. 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 following

the procedures outlined in the DHS FOIA regulations at 6 C.F.R. Part 5 § 5.8. You may submit your appeal electronically at [GILDFOIAAppeals@ice.dhs.gov](mailto:GILDFOIAAppeals@ice.dhs.gov) or via regular mail 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 FOIA allow DHS to charge for processing fees, up to \$25, unless you seek a waiver of fees. In this instance, because the cost is below the \$25 minimum, there is no charge. 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 **2019-ICFO-35986**. 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 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,



*for* Catrina M. Pavlik-Keenan  
FOIA Officer