

EXHIBIT D

Los Angeles Times

July 20, 2020

U.S. Department of Homeland Security
% Office of Inspector General
foia.oig@oig.dhs.gov

Dear records officer,

This is a request under the Freedom of Information Act. I request that you provide **machine-readable electronic** copies of records containing the information described below from **January 1, 2015 to the date you process this request:**

- All DHS OIG (Office of Inspector General) Reports of Investigations (ROIs) relating to allegations at dedicated ERO (Enforcement and Removal Operations) facilities that have been **previously released** under the Freedom of Information Act (*this is colloquially known as a 'piggyback' request*). Please include all relevant exhibits and attachments.

Please provide records in **machine-readable electronic** format on **a *rolling basis* as they become available**. We prefer to receive records in the following formats, listed in order of preference:

- (1) a spreadsheet format such as an Excel file, tab-delimited file or similar;
- (2) word processing file, text-based PDF, or similar;
- (3) other non-proprietary electronic format;
- (4) paper copies.

Please also provide any and all documentation related to such electronic records, including but not limited to **data dictionaries, database documentation, record layouts, code sheets, data entry instructions**, and similar printed or electronic documentation materials.

Please respond within **20 working days**, as the Act provides, or notify me if “unusual” or “exceptional” circumstances apply (as the Act uses those terms).

If you withhold an exempt portion of any record, we specifically request the release of all segregable non-exempt portions, including but not limited to email header information (e.g., sender, recipients, date, subject) and analogous information in non-email documents. If you withhold any record or portion of a record, please specify which statutory exemptions are claimed for each withholding. Please separately state your reasons for not invoking your discretion, as the Act allows, to release the requested information. Please describe each record withheld, including its date and size (e.g., amount of electronic memory or number of paper pages).

If there are any search, review, or duplication **fees greater than \$25**, inform me before you fill the request. But first please consider our requests for fee reduction and fee waiver:

Los Angeles Times

Request for fee reduction as a representative of the news media:

The Los Angeles Times is a news media organization, and therefore this request should be exempt from all fees for search and review. This request is being made in connection with the Times' newsgathering functions and not for any other commercial purpose.

Request for fee waiver:

In addition, I request a waiver of all duplication fees for this request as permitted under the Act. Disclosure of the requested information to the Times is likely to contribute significantly to public understanding of the operations or activities of the government relating to immigration policy.

The disclosures we request under the Freedom of Information Act primarily serve the public interest and not any commercial interest.

Please feel free to contact me about any aspect of this request. In principle, I am willing to consider ways in which the request might reasonably be narrowed.

Thank you in advance for your diligence and compliance with federal open records law.

Best regards,
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