

# **EXHIBIT 1**

**CREEC**

CIVIL RIGHTS EDUCATION  
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August 15, 2017

VIA Email to [ICE-FOIA@dhs.gov](mailto:ICE-FOIA@dhs.gov)  
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.

1. Any contract(s) and/or agreement(s) between the United States Department of Homeland Security ("DHS"), U.S. Immigration and Customs Enforcement ("ICE") and the City of Adelanto, California, that have been in place at any time between 2010 until the present, even if such contracts were entered into prior to 2010.

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2. Any contract(s) and/or agreement(s) with third party contractors regarding housing ICE detainees or providing medical care for ICE detainees at Adelanto Detention Facility, including but not limited to: any contract with the GEO Group regarding the operation of the Adelanto Detention Facility and the contract with Correct Care Solutions regarding the provision of medical care for ICE detainees at Adelanto Detention Facility.
3. Any and all writings and documents related to current policies and protocols concerning medical care for immigrant detainees in Adelanto Detention Facility.
4. The current staffing levels of medical personnel in Adelanto Detention Facility.
5. Any and all writings related to the current housing and classification policies for detainees held in Adelanto Detention Facility.
6. Any and all writings related to changes in policies and/or procedures at the Adelanto Detention Facility in response to the June 30, 2017 letter from the ACLU of Southern California.
7. Any and all writings related to changes in policies and/or procedures at the Adelanto Detention Facility in response to the complaint filed by Nicole Ramos, Project Director for Al Otro Lado, on June 22, 2017.
8. Any and all writings related to changes in policies and/or procedures at the Adelanto Detention Facility in response to the report entitled, "Systemic Indifference: Dangerous & Substandard Medical Care in US Immigration Detention" produced by Human Rights Watch and CIVIC on May 8, 2017.
9. Any and all writings related to changes in policies and/or procedures at the Adelanto Detention Facility in response to the complaint filed by CIVIC on April 11, 2017 re: "Sexual Abuse, Assault, and Harassment in U.S. Immigration Detention Facilities."
10. Any and all writings related to changes in policies and/or procedures at the Adelanto Detention Facility in response to the report entitled, "Fatal Neglect: How ICE Ignores Deaths in Detention," produced by the

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American Civil Liberties Union, Detention Watch Network, and the National Immigrant Justice Center in February of 2016.

11. Any and all writings related to changes in policies and/or procedures at the Adelanto Detention Facility in response to the report entitled, "Abuse in Adelanto: An Investigation into a California Town's Immigration Jail," produced by Detention Watch Network and the CIVIC in October of 2015.
12. Any and all writings related to changes in policies and/or procedures at the Adelanto Detention Facility in response to the July 14, 2015 Congressional letter sent to ICE and DHS officials regarding the conditions at Adelanto Detention Facility.
13. Any and all writings related to changes in policies and/or procedures at the Adelanto Detention Facility in response to the May 15, 2015 letter from Southern California legal service providers and human rights organizations, including the ACLU of Southern California, regarding health care at the Adelanto Detention Facility.
14. Any and all writings related to changes in policies and/or procedures at the Adelanto Detention Facility in response to inspections or detainee death reviews by the Office of Detention Oversight, or any DHS subsidiary, on or after January 1, 2011.
15. Any and all writings related to changes in policies and/or procedures at the Adelanto Detention Facility in response to deaths of detainees at the Facility, including the 2012 death of Fernando Dominguez-Valdivia, a/k/a Fernando Dominguez-Valivia and the 2015 death of Raul Ernesto Morales-Ramos.
16. Any Detainee Death Review or other documentation produced in response to the 2012 death of Fernando Dominguez-Valdivia, a/k/a Fernando Dominguez-Valivia.
17. Any Detainee Death Review, Significant Event Notification, Significant Incident Report, or Reports related to a "permanent injury beyond medical intervention" for any person detained in ICE custody at the Adelanto Detention Facility from 2010 to present.

Please contact me if you need any clarification on the records requested. If you have an electronic means of providing this information that

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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 U.S.C. §552 (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



Caitilin R. Hall  
Paralegal