

April 19, 2019

VIA Email to ICE-FOIA@dhs.gov
U.S. Immigration and Customs Enforcement
Freedom of Information Act Office
500 12th 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 section of the request is to seek information regarding the Denver Contract Detention Facility ("DCDF") located at 3130 North Oakland Street, Aurora, CO 80010 and its newly-expanded annex, ("Aurora South"), located at 11901 E 30th Avenue, Aurora, CO 80010. ICE detainees are held at Aurora South and a one-year extension of its contract was recently announced. This facility is also sometimes known as the Aurora ICE Processing Center. Unless otherwise specified, all references to a detention facility in this letter are to the detention facility and/or the expanded annex in Aurora, CO where ICE detainees are held. Specifically we are requesting:

1. Any and all writings and documents related to a one-year contract to place ICE detainees in the remodeled 432-bed annex known as "Aurora South" next to DCDF, publicly announced on April 15, 2019, including agreements and communications between the United States Department of Homeland Security ("DHS"), U.S. Immigration and Customs Enforcement ("ICE), and The GEO Group, Inc. ("GEO"). This

request is for all documents created subsequent to the supposed 90-day expansion of operations at Aurora South begun in early 2019.

The purpose of this section of the 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 the below paragraph are to the GEO facility in Adelanto, CA, housing ICE detainees.

2. Any and all writings and documents related to the death of detainee Vicente Caceres-Maradiaga, who died in ICE custody on May 31, 2017, or the investigation thereof, including but not limited to any Detainee Death Reviews prepared by the Office of Professional Responsibility, Office of Detention Oversight, or External Reviews and Analysis Unit; any communications between ICE, GEO, and the investigating office; any and all medical and mental health records, detainee location logs, segregation logs, kites, grievances, medical and mental health screening and assessments, and any other records pertaining to the circumstances leading up to his death, including but not limited to videos and logs of communication with central control.

Please contact me if you need any clarification on the records requested. If you have an electronic means of providing this information that would be acceptable. The Civil Rights Education and Enforcement Center ("CREEC") requests a waiver of fees for document search, review, and duplication on the grounds that disclosure of the requested records is in the public interest and because disclosure 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. § 552(a)(4)(A)(iii). CREEC also requests a waiver of search fees on the grounds that the CREEC qualifies as a "representative of the news media" and the records are not sought for commercial use. 5 U.S.C. § 552(a)(4)(A)(ii)(II).

If such a waiver is not granted and copying is required, we will pay reasonable copying costs up to \$200. If you expect copying costs to exceed


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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



S. Marième Diop
Paralegal