

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



U.S. Immigration  
and Customs  
Enforcement

September 6, 2023

Ms. Jacqueline Stevens  
601 University Place, 2d floor  
Political Science Department  
Evanston, IL 60208

**RE: Stevens v. ICE 20-cv-2725**  
**ICE FOIA Case Number 2020-ICLI-00042**  
**Supplemental Release**

Dear Ms. Stevens:

This letter is a supplemental response to your client's Freedom of Information Act (FOIA) requests to U.S. Immigration and Customs Enforcement (ICE). Your client seeks records relating to the following Freedom of Information Act requests: 2018-ICFO-56530, 2020-ICFO-18634, 2019-ICFO-33429, 2019-ICFO-29171, 2018-ICFO-59138, and 2019-ICFO-24680. ICE has considered your request under the FOIA, 5 U.S.C. § 552.

For this production, ICE is making a discretionary re-release of 199 pages of records. ICE has reviewed the pages and determined that 77 pages will be released in full and portions of the remaining 122 pages will be withheld pursuant to FOIA Exemptions (b)(4), (b)(6), (b)(7)(C) and (b)(7)(E) as described below. The pages will retain their original Bates numbers.

**FOIA Exemption 4** protects trade secrets and commercial or financial information obtained from a person that is privileged or confidential. This exemption covers two categories of information in federal agency records: (1) trade secrets; and (2) information that is commercial or financial, obtained from a person (which may include corporations or state governments), and privileged or confidential, which is both customarily and actually treated as private by the submitter of the information. *See Food Marketing Institute v. Argus Leader Media*, 139 S. Ct. 2356, 2362-63 (2019). I have reviewed the responsive documents, the submitter's objections to release, and relevant case law, and I have determined that portions of the responsive records are exempt from disclosure under subsection (b)(4) of the FOIA and must be withheld in order to protect the submitter's proprietary interests.

ICE has applied FOIA Exemptions 6 and 7(C) to protect from disclosure the personally identifiable information of DHS employees and third parties contained within the records.

**FOIA Exemption 6** exempts from disclosure personnel or medical files and similar files the release of which would cause a clearly unwarranted invasion of personal privacy. This requires a balancing of the public's right to disclosure against the individual's right to privacy. The privacy

interests of the non-public-facing individuals in the records you have requested outweigh any minimal public interest in disclosure of the information. Any private interest you may have in that information does not factor into the aforementioned balancing test.

**FOIA Exemption 7(C)** protects records or information compiled for law enforcement purposes that could reasonably be expected to constitute an unwarranted invasion of personal privacy. This exemption takes note of the strong interests of individuals, whether they are suspects, witnesses, investigators, or individuals performing their official duties in connection with a law enforcement agency, in not being unwarrantably associated with alleged criminal activity or becoming targets for revenge by begrudged individuals. Based upon the traditional recognition of strong privacy interest in law enforcement records, categorical withholding of information that identifies third parties in law enforcement records is ordinarily appropriate. As such, I have determined that the privacy interest in the identities of the non-public-facing individuals in the records you have requested clearly outweigh any minimal public interest in disclosure of the information. Please note that any private interest you may have in that information does not factor into this determination.

**FOIA Exemption 7(E)** protects records compiled for law enforcement purposes, the release of which would disclose techniques and/or procedures for law enforcement investigations or prosecutions or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law. I have determined that disclosure of certain law enforcement sensitive information contained within the responsive records could reasonably be expected to risk circumvention of the law. Additionally, the techniques and procedures at issue are not well known to the public.

If you have any questions about this letter, please contact Assistant United States Attorney Alex Hartzler at [Alex.Hartzler@usdoj.gov](mailto:Alex.Hartzler@usdoj.gov).

Sincerely,

Marcus K. Francis Sr.  
Supervisory Paralegal Specialist

Enclosure: 199 pages

2. AMENDMENT/MODIFICATION NO. P00003	3. EFFECTIVE DATE See Block 16C	4. REQUISITION/PURCHASE REQ. NO.	5. PROJECT NO. (If applicable)
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6. ISSUED BY ICE/DCR	7. ADMINISTERED BY (If other than Item 6)
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ICE/Detention Compliance & Removals  
Immigration and Customs Enforcement  
Office of Acquisition Management  
801 I Street, NW Suite 930  
WASHINGTON DC 20536

8. NAME AND ADDRESS OF CONTRACTOR (No., street, county, State and ZIP Code)  STG INTERNATIONAL INC ATTN (b)(6); (b)(7)(C) 99 CANAL CENTER PLAZA SUITE 500 ALEXANDRIA VA 22314	(x) 9A. AMENDMENT OF SOLICITATION NO.  9B. DATED (SEE ITEM 11)  x 10A. MODIFICATION OF CONTRACT/ORDER NO. 70CDCR18C00000003  10B. DATED (SEE ITEM 13) 02/20/2018
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**11. THIS ITEM ONLY APPLIES TO AMENDMENTS OF SOLICITATIONS**

The above numbered solicitation is amended as set forth in Item 14. The hour and date specified for receipt of Offers  is extended.  is not extended.  
Offers must acknowledge receipt of this amendment prior to the hour and date specified in the solicitation or as amended, by one of the following methods: (a) By completing Items 8 and 15, and returning \_\_\_\_\_ copies of the amendment; (b) By acknowledging receipt of this amendment on each copy of the offer submitted; or (c) By separate letter or telegram which includes a reference to the solicitation and amendment numbers. FAILURE OF YOUR ACKNOWLEDGEMENT TO BE RECEIVED AT THE PLACE DESIGNATED FOR THE RECEIPT OF OFFERS PRIOR TO THE HOUR AND DATE SPECIFIED MAY RESULT IN REJECTION OF YOUR OFFER. If by virtue of this amendment you desire to change an offer already submitted, such change may be made by telegram or letter, provided each telegram or letter makes reference to the solicitation and this amendment, and is received prior to the opening hour and date specified.

12. ACCOUNTING AND APPROPRIATION DATA (If required)  
See Schedule

**13. THIS ITEM ONLY APPLIES TO MODIFICATION OF CONTRACTS/ORDERS. IT MODIFIES THE CONTRACT/ORDER NO. AS DESCRIBED IN ITEM 14.**

CHECK ONE	A. THIS CHANGE ORDER IS ISSUED PURSUANT TO: (Specify authority) THE CHANGES SET FORTH IN ITEM 14 ARE MADE IN THE CONTRACT ORDER NO. IN ITEM 10A.
	B. THE ABOVE NUMBERED CONTRACT/ORDER IS MODIFIED TO REFLECT THE ADMINISTRATIVE CHANGES (such as changes in paying office, appropriation date, etc.) SET FORTH IN ITEM 14, PURSUANT TO THE AUTHORITY OF FAR 43.103(b).
X	C. THIS SUPPLEMENTAL AGREEMENT IS ENTERED INTO PURSUANT TO AUTHORITY OF: FAR 52.212-4 (c)
	D. OTHER (Specify type of modification and authority)

**E. IMPORTANT:** Contractor  is not.  is required to sign this document and return 1 copies to the issuing office.

14. DESCRIPTION OF AMENDMENT/MODIFICATION (Organized by UCF section headings, including solicitation/contract subject matter where feasible.)

DUNS Number: 179570403  
 COR: CAPT (b)(6); (b)(7)(C)  
 Phone: 202-732-(b)(6);  
 Email: (b)(6); (b)(7)(C)@ice.dhs.gov  
  
 ACOR: LCDR (b)(6); (b)(7)(C)  
 Phone: 202-732-(b)(6);  
 Email: (b)(6); (b)(7)(C)@ice.dhs.gov  
  
 ACOR: (b)(6); (b)(7)(C)  
 Phone: 202-732-(b)(6); (b)(7)(C)  
 Continued ...

Except as provided herein, all terms and conditions of the document referenced in Item 9 A or 10A, as heretofore changed, remains unchanged and in full force and effect.

15A. NAME AND TITLE OF SIGNER (Type or print) (b)(6); (b)(7)(C) President and CEO	16A. NAME AND TITLE OF CONTRACTING OFFICER (Type or print) (b)(6); (b)(7)(C)
15B. CO (b)(6); (b)(7)(C) or	15C. DATE SIGNED 6/28/18
	16B. UNITED STATES OF AMERICA (b)(6); (b)(7)(C) <i>(Signature of Contracting Officer)</i>
	16C. DATE SIGNED Digitally signed by (b)(6); (b)(7)(C) Date: 2018.06.29 09:54:41 -04'00'

NAME OF OFFEROR OR CONTRACTOR  
STG INTERNATIONAL INC

ITEM NO. (A)	SUPPLIES/SERVICES (B)	QUANTITY (C)	UNIT (D)	UNIT PRICE (E)	AMOUNT (F)
	<p>Email: (b)(6); (b)(7)(C)@ice.dhs.gov</p> <p>Contracting Officer: (b)(6); (b)(7)(C)</p> <p>Phone: 202-732-(b)(6);</p> <p>Email: (b)(6); (b)(7)(C)@ice.dhs.gov</p> <p>There are no requisitions associated with this modification.</p> <p>The purpose of P00003 is the following:</p> <ol style="list-style-type: none"> <li>1. Release the suspension of performance from P00001 on the contract. <ul style="list-style-type: none"> <li>a. Given that no work was performed during the stop work period, the period of performance for all CLINs has been updated to coincide with the lifting of the suspension of work.</li> <li>b. Both parties have agreed to delay the transition of the Stewart Facility and Dilley Facility until further notice.</li> <li>c. CONTRACTOR STATEMENT OF RELEASE: In consideration of the modification agreed to herein, as complete equitable adjustment for the changes specified, the Contractor hereby releases U.S. Immigration and Customs Enforcement (ICE) from any and all liability under this contract for further adjustments attributable to such facts or circumstances giving rise to this adjustment.</li> </ul> </li> <li>2. As a result, the total obligated amount on 70CDCR18C00000003 remains the same.</li> </ol> <p>Exempt Action: Y Sensitive Award: PII  Delivery: 02/20/2018  Delivery Location Code: ICE/ERO  ICE Enforcement &amp; Removal  Immigration and Customs Enforcement  801 I Street, NW  Suite 900  Washington DC 20536</p> <p>Accounting Info:  (b)(7)(E)</p> <p>-----</p> <p>Period of Performance: 02/20/2018 to 06/28/2023</p> <p>Continued ...</p>				

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NAME OF OFFEROR OR CONTRACTOR  
STG INTERNATIONAL INC

ITEM NO. (A)	SUPPLIES/SERVICES (B)	QUANTITY (C)	UNIT (D)	UNIT PRICE (E)	AMOUNT (F)
0001	<p>Change Item 0001 to read as follows (amount shown is the obligated amount):</p> <p>Base Year - IHSC Medical Staffing Services Period of Performance: 06/29/2018 - 06/28/2019</p> <p>This is a Labor Hour CLIN</p> <p>The proposed rates and other information in the incorporated proposal which applied to CLINs 0001 to 0003 and 0005 to 0022 apply to this CLIN. This change in CLIN structure is administrative in nature to ease accounting and invoicing burdens and does not substantively affect the rights of the parties. Facilities to be covered under this CLIN and their Estimated Hours Per Year (EHPY) include:</p> <p>Alexandria Facility (b)(4) Berks Facility - Buffalo Facility El Paso Facility Elizabeth Facility Eloy Facility - Florence Facility Houston Facility HQ Facility - EH Jena Facility - Krome Facility - LA Staging Facility Pearsall Facility Port Isabel Facility San Diego Facility Santa Ana Facility Stewart Facility Tacoma Facility Taylor Facility Varick Facility York Facility -</p> <p>Fully Funded Obligation Amount: (b)(4) Incrementally Funded Amount: (b)(4) Product/Service Code: Q201 Product/Service Description: MEDICAL- GENERAL HEALTH CARE</p>				0.00
0002	<p>Change Item 0002 to read as follows (amount shown is the obligated amount):</p> <p>Dilley Facility Continued ...</p>				0.00

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NAME OF OFFEROR OR CONTRACTOR  
STG INTERNATIONAL INC

ITEM NO. (A)	SUPPLIES/SERVICES (B)	QUANTITY (C)	UNIT (D)	UNIT PRICE (E)	AMOUNT (F)
	Period of Performance: 06/29/2018 - 06/28/2019  Estimated Hours Per Year (EHPY): 251,680  This is a Labor Hour CLIN Fully Funded Obligation Amount: (b)(4) Incrementally Funded Amount: (b)(4) Product/Service Code: Q201 Product/Service Description: MEDICAL- GENERAL HEALTH CARE  Change Item 0003 to read as follows (amount shown is the obligated amount):				
0003	NTE Travel Period of Performance: 06/29/2018 - 06/28/2019  This is a Cost-Reimbursable CLIN Product/Service Code: Q201 Product/Service Description: MEDICAL- GENERAL HEALTH CARE  Change Item 0004 to read as follows (amount shown is the obligated amount):				0.00
0004	Transition In Period of Performance: 06/29/2018 to 08/29/2018  This is a Labor Hour CLIN Obligated Amount: \$0.00 Product/Service Code: Q201 Product/Service Description: MEDICAL- GENERAL HEALTH CARE  Change Item 1001 to read as follows (amount shown is the obligated amount):	1	LO	0.00	0.00
1001	Option Year 1 - IHSC Medical Staffing Services Period of Performance: 06/29/2019 - 06/28/2020  This is a Labor Hour CLIN  The proposed rates and other information in the incorporated proposal which applied to CLINs 1001 to 1003 and 1005 to 1022 apply to this CLIN. This change in CLIN structure is administrative in nature to ease accounting and invoicing burdens and does not substantively affect the rights of Continued ...				0.00

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NAME OF OFFEROR OR CONTRACTOR  
STG INTERNATIONAL INC

ITEM NO. (A)	SUPPLIES/SERVICES (B)	QUANTITY (C)	UNIT (D)	UNIT PRICE (E)	AMOUNT (F)
	<p>the parties. Facilities to be covered under this CLIN and their Estimated Hours Per Year (EHPY) include:</p> <p>Alexandria Facility (b)(4)                      Berks Facility - E                      Buffalo Facility -                      El Paso Facility -                      Elizabeth Facility                      Eloy Facility - EH                      Florence Facility                      Houston Facility -                      HQ Facility - EHPY                      Jena Facility - EH                      Krome Facility - E                      LA Staging Facilit                      Pearsall Facility                      Port Isabel Facili                      San Diego Facility                      Santa Ana Facility                      Stewart Facility -                      Tacoma Facility -                      Taylor Facility -                      Varick Facility -                      York Facility - EH</p> <p>Amount: (b)(4) (Option Line Item)                      30 Days After Award                      Product/Service Code: Q201                      Product/Service Description: MEDICAL- GENERAL HEALTH CARE</p> <p>Change Item 1002 to read as follows (amount shown is the obligated amount):</p>				
1002	<p>Option Year 1 - Dilley Facility                      Period of Performance: 06/29/2019 - 06/28/2020</p> <p>Estimated Hours Per Year (EHPY): 251,680</p> <p>This is a Labor Hour CLIN                      Amount: (b)(4) (Option Line Item)                      30 Days After Award                      Product/Service Code: Q201                      Product/Service Description: MEDICAL- GENERAL HEALTH CARE</p> <p>Change Item 1003 to read as follows (amount shown is the obligated amount):</p>				0.00
1003	<p>Option Year 1 - NTE Travel                      Continued ...</p>				0.00

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NAME OF OFFEROR OR CONTRACTOR  
STG INTERNATIONAL INC

ITEM NO. (A)	SUPPLIES/SERVICES (B)	QUANTITY (C)	UNIT (D)	UNIT PRICE (E)	AMOUNT (F)
2001	<p>Period of Performance: 06/29/2019 - 06/28/2020</p> <p>This is a Cost-Reimbursable CLIN Amount: \$0.00 (Option Line Item) 30 Days After Award Product/Service Code: Q201 Product/Service Description: MEDICAL- GENERAL HEALTH CARE</p> <p>Change Item 2001 to read as follows (amount shown is the obligated amount):</p> <p>Option Year 2 - IHSC Medical Staffing Services Period of Performance: 06/29/2020 - 06/28/2021</p> <p>This is a Labor Hour CLIN</p> <p>The proposed rates and other information in the incorporated proposal which applied to CLINs 2001 to 2003 and 2005 to 2022 apply to this CLIN. This change in CLIN structure is administrative in nature to ease accounting and invoicing burdens and does not substantively affect the rights of the parties. Facilities to be covered under this CLIN and their Estimated Hours Per Year (EHPY) include:</p> <div data-bbox="418 1094 776 1766" style="border: 1px solid black; padding: 5px;"> <p>(b)(4)</p> <p>Alexandria Facility - Berks Facility - Buffalo Facility El Paso Facility Elizabeth Facility Eloy Facility - Florence Facility Houston Facility HQ Facility - EH Jena Facility - Krome Facility - LA Staging Facility Pearsall Facility Port Isabel Facility San Diego Facility Santa Ana Facility Stewart Facility Tacoma Facility Taylor Facility Varick Facility York Facility -</p> </div> <p>Amount: (b)(4) (Option Line Item) 30 Days After Award Continued ...</p>				0.00



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NAME OF OFFEROR OR CONTRACTOR  
STG INTERNATIONAL INC

ITEM NO. (A)	SUPPLIES/SERVICES (B)	QUANTITY (C)	UNIT (D)	UNIT PRICE (E)	AMOUNT (F)
2002	<p>Product/Service Code: Q201 Product/Service Description: MEDICAL- GENERAL HEALTH CARE</p> <p>Change Item 2002 to read as follows (amount shown is the obligated amount):</p> <p>Option Year 2 - Dilley Facility Period of Performance: 06/29/2020 - 06/28/2021</p> <p>Estimated Hours Per Year (EHPY): 251,680</p> <p>This is a Labor Hour CLIN Amount: (b)(4) Option Line Item) 30 Days After Award Product/Service Code: Q201 Product/Service Description: MEDICAL- GENERAL HEALTH CARE</p>				0.00
2003	<p>Change Item 2003 to read as follows (amount shown is the obligated amount):</p> <p>Option Year 2 - NTE Travel Period of Performance: 06/29/2020 - 06/28/2021</p> <p>This is a Cost-Reimbursable CLIN Amount: \$0.00 (Option Line Item) 30 Days After Award Product/Service Code: Q201 Product/Service Description: MEDICAL- GENERAL HEALTH CARE</p>				0.00
3001	<p>Change Item 3001 to read as follows (amount shown is the obligated amount):</p> <p>Option Year 3 - IHSC Medical Staffing Services Period of Performance: 06/29/2021 - 06/28/2022</p> <p>This is a Labor Hour CLIN</p> <p>The proposed rates and other information in the incorporated proposal which applied to CLINs 3001 to 3003 and 3005 to 3022 apply to this CLIN. This change in CLIN structure is administrative in nature to ease accounting and invoicing burdens and does not substantively affect the rights of the parties. Facilities to be covered under this CLIN and their Estimated Hours Per Year (EHPY) include:</p> <p>Continued ...</p>				0.00

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NAME OF OFFEROR OR CONTRACTOR  
STG INTERNATIONAL INC

ITEM NO. (A)	SUPPLIES/SERVICES (B)	QUANTITY (C)	UNIT (D)	UNIT PRICE (E)	AMOUNT (F)
	Alexandria Facility (b)(4) Berks Facility - E Buffalo Facility - El Paso Facility - Elizabeth Facility Eloy Facility - EH Florence Facility Houston Facility - HQ Facility - EHPY Jena Facility - EH Krome Facility - E LA Staging Facilit Pearsall Facility Port Isabel Facili San Diego Facility Santa Ana Facility Stewart Facility - Tacoma Facility - Taylor Facility - Varick Facility - York Facility - EH Amount: (b)(4) (Option Line Item) 30 Days After Award Product/Service Code: Q201 Product/Service Description: MEDICAL- GENERAL HEALTH CARE  Change Item 3002 to read as follows (amount shown is the obligated amount):				
3002	Option Year 3 - Dilley Facility Period of Performance: 06/29/2021 - 06/28/2022  Estimated Hours Per Year (EHPY): 251,680  This is a Labor Hour CLIN Amount: (b)(4) (Option Line Item) 30 Days After Award Product/Service Code: Q201 Product/Service Description: MEDICAL- GENERAL HEALTH CARE  Change Item 3003 to read as follows (amount shown is the obligated amount):				0.00
3003	Option Year 3 - NTE Travel Period of Performance: 06/29/2021 - 06/28/2022  This is a Cost-Reimbursable CLIN Amount: \$0.00 (Option Line Item) Continued ...				0.00

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NAME OF OFFEROR OR CONTRACTOR  
STG INTERNATIONAL INC

ITEM NO. (A)	SUPPLIES/SERVICES (B)	QUANTITY (C)	UNIT (D)	UNIT PRICE (E)	AMOUNT (F)
4001	<p>30 Days After Award Product/Service Code: Q201 Product/Service Description: MEDICAL- GENERAL HEALTH CARE</p> <p>Change Item 4001 to read as follows (amount shown is the obligated amount):</p> <p>Option Year 4 - IHSC Medical Staffing Services Period of Performance: 06/29/2022- 06/28/2023</p> <p>This is a Labor Hour CLIN</p> <p>The proposed rates and other information in the incorporated proposal which applied to CLINs 4001 to 4003 and 4005 to 4022 apply to this CLIN. This change in CLIN structure is administrative in nature to ease accounting and invoicing burdens and does not substantively affect the rights of the parties. Facilities to be covered under this CLIN and their Estimated Hours Per Year (EHPY) include:</p> <div data-bbox="467 968 740 1650" style="border: 1px solid black; padding: 5px;"> <p>(b)(4)</p> <p>Alexandria Facility</p> <p>Berks Facility - EHPY</p> <p>Buffalo Facility - EHPY</p> <p>El Paso Facility - EHPY</p> <p>Elizabeth Facility - EHPY</p> <p>Eloy Facility - EHPY</p> <p>Florence Facility - EHPY</p> <p>Houston Facility - EHPY</p> <p>HQ Facility - EHPY:</p> <p>Jena Facility - EHPY</p> <p>Krome Facility - EHPY</p> <p>LA Staging Facility</p> <p>Pearsall Facility - EHPY</p> <p>Port Isabel Facility</p> <p>San Diego Facility</p> <p>Santa Ana Facility</p> <p>Stewart Facility - EHPY</p> <p>Tacoma Facility - EHPY</p> <p>Taylor Facility - EHPY</p> <p>Varick Facility - EHPY</p> <p>York Facility - EHPY</p> </div> <p>Amount: (b)(4) Option Line Item)</p> <p>30 Days After Award Product/Service Code: Q201 Product/Service Description: MEDICAL- GENERAL HEALTH CARE</p> <p>Continued ...</p>				0.00

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NAME OF OFFEROR OR CONTRACTOR  
STG INTERNATIONAL INC

ITEM NO. (A)	SUPPLIES/SERVICES (B)	QUANTITY (C)	UNIT (D)	UNIT PRICE (E)	AMOUNT (F)
4002	<p>Change Item 4002 to read as follows (amount shown is the obligated amount):</p> <p>Option Year 4 - Dilley Facility Period of Performance: 06/29/2022- 06/28/2023</p> <p>Estimated Hours Per Year (EHPY): 251,680</p> <p>This is a Labor Hour CLIN Amount: (b)(4) Option Line Item) 30 Days After Award Product/Service Code: Q201 Product/Service Description: MEDICAL- GENERAL HEALTH CARE</p>				0.00
4003	<p>Change Item 4003 to read as follows (amount shown is the obligated amount):</p> <p>Option Year 4 - NTE Travel Period of Performance: 06/29/2022- 06/28/2023</p> <p>This is a Cost-Reimbursable CLIN Amount: \$0.00 (Option Line Item) 30 Days After Award Product/Service Code: Q201 Product/Service Description: MEDICAL- GENERAL HEALTH CARE</p> <p>Except as provided herein, all terms and conditions of the document referenced in Item 9A or 10A, as heretofore changed, remains unchanged and in full force and effect.</p>				0.00