Stevens v. BBG et al., 18-cv-5391 ICE

2018-ICFO-26000, ICE response no. 2018-ICLI-00052

https://deportationresearchclinic.org/

From: <ECU >

Sent: 10 Jul 2018 23:01:43 +0000

To: (b)(6);(b)(7)(C)

Subject: PLAnet Task Assigned

You have been assigned a task in the OCMS system to review:

101945- Hungary Dashboard Data Call - 07-10-2018 - Frankel, Marklocated at



Description:

BACKGROUND: DHS I&A requests in anticipation of briefings for DHS senior leadership next week on this issue we would like to follow up to reiterate our request to provide updates for the attached dashboard. We want to ensure that we are accurately representing this information and also capturing the good work that your components continue to perform. Please see the list below for the categories your component can help to address: ICE: Disposition of individuals who gained entry (Through both VWP & visas) CBP: Identities in TECS; Visa holders/ESTA candidates (gained entry/refused at POE) USCIS: Immigration benefits (Applied for/denied/revoked)

INSTRUCTIONS: Review and comment

COMPONENTS: HSI Due 7/11 at 4PM then OPLA

OPLA DIVISIONS: CLS EROLD

b)(7)(E)

Due Date:

7/12/2018 10:00 AM

Sincerely,

PLAnet Tasking Team

From: <ECU >

Sent: 17 Aug 2018 14:39:33 +0000

To: (b)(6);(b)(7)(C)

Subject: PLAnet Task Assigned

You have been assigned a task in the OCMS system to review:

(b)(7)(E)

Description:

BACKGROUND: Please provide ICE policies and procedures on voluntary work programs in detention facilities in which detainees are paid \$1 per day and/or other nominal sums to perform tasks such a laundry and cleaning toilets. Please provide a complete list of task assignments that may be completed by voluntary work program participants in ICE detention facilities in California.

INSTRUCTIONS: Review and comment

COMPONENTS: OPLA

OPLA DIVISION: EROLD DCLD CALD

ICATT LINK (for ECU only):

b)(7)(E)

Due Date:

8/17/2018 11:00 AM

Sincerely,

PLAnet Tasking Team

Sent: 6 Dec 2017 13:56:23 -0500

To: (b)(6);(b)(7)(C)

Cc:

Subject: RE: Chen v. GEO and State v. GEO; Orders Denying GEO's Motion to

Dismiss

Thank Years ago, I went to law school down the street from Judge Bryan's courtroom--he's been on the bench a long time. I think (b)(5)

Appreciate you passing it on...

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----Original Message----

From (h)(6)·(h)(7)(C)

Sent: Wednesday, December 06, 2017 1:31 PM

To: (b)(6);(b)(7)(C)

Cc:

Subject: FW: Chen v. GEO and State v. GEO; Orders Denying GEO's Motion to Dismiss

(b)(6);(b)(7)(C)

The District Court denied GEO's Motion to Dismiss.

(b)(6);(b)

(b)(6);(b)(7)(C

Deputy Chief Counsel

Seattle Office of the Chief Counsel / OPLA Tacoma sub-office U.S. Immigration and Customs Enforcement U.S. Department of Homeland Security

Tel: (253) 779-(6)(6) / Fax: (253) 779-6006

----Original Message----

From (6)(6)(6)(7)(C) 3brancheslaw.com Sent: Wednesday, December 06, 2017 10:26 AM

T(/h)/6)·/h)/7)/C)

Subject: Chen v. GEO and State v. GEO; Orders Denying GEO's Motion to Dismiss

Hi (b)(6);(b)(

Please see attached Orders which were filed today.



(b)(6);(b)(7)(

Paralegal

III Branches Law, PLLC

1019 Regents Blvd., Ste.

Fircrest, WA 98466 ph: (253)-566-(0)(6)

fx: (281)-664-4643

b)(6);(b)(7 ancheslaw.com

Sent: 12 Jun 2018 19:19:48 +0000

To: (b)(6):(b)(7)(C)

Subject: RE: Chen v. GEO Touhy

That would be great (b)(6);(b)(



(b)(6);(b)(7)(C)

Associate Legal Advisor

District Court Litigation Division

Office of the Principal Legal Advisor U.S. Immigration & Customs Enforcement 202-732 (desk) | 202-875-(0)(6) (cell)

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Fron (b)(6);

Sent: Tuesday, June 12, 2018 3:17 PM

(b)(6);(b)(7)(C)

Subject: RE: Chen v. GEO Touhy

I can ask about this whe and I talk with ERO HQ, but I have a feeling we may need to follow up with OCC and ERO at Aurora. If you would like, I can email them.

(b)(6);(b)(7)(C)

Associate Legal Advisor
Detention and Removal Law Section
Enforcement and Removal Operations Law Division
Office of the Principal Legal Advisor
DHS U.S. Immigration and Customs Enforcement
202-732-6566 (office)
202-441-6766 (cell)

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Sent: Tuesday, June 12, 2018 2:18 PM

(b)(6);(b)(7)(C

Subject: RE: Chen v. GEO Touhy

BTW, it would be good to know if (b)(5)

b)(5)

(b)(6);(b) (7)(C)

(b)(6);(b)(7)(C)
Associate Legal Advisor

District Court Litigation Division

Office of the Principal Legal Advisor
U.S. Immigration & Customs Enforcement

202-732- (desk) | 202-875-

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From: (b)(6);(b)(7)(C)

Sent: Tuesday, June 12, 2018 1:48 PM

(b)(b);(b)(7)(C)

 $C_{C}^{(b)(6);(b)(7)(C)}$

Subject: RE: Chen v. GEO Touhy

Thanks ((b)(6);(b)(7)(C)

In the event that we cannot figure out (b)(5)

(b)(5)

(b)(6);(b)(7)(C)

Associate Legal Advisor
Government Information Law Division
Office of the Principal Legal Advisor

U.S. Immigration and Customs Enforcement

Office: (202) 732(0)(6)(b)(Cell: (202) 573(0)(6)(b)(

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(b)(6);(b)(7)(C) From:	
Sent: Tuesday, June 12, 2018 1:38 PM	
To(b)(6);(b)(7)(C) Cc	
Subject: RE: Chen v. GEO Touhy	
Hi <u>n/C)</u>	
I made a number of edits. I know (b)(5)	
(b)(5)	
Also, I asked (b)(5)	
(b)(5)	

Best,

(b)(6);(b)(7)(C)

Associate Legal Advisor
Commercial and Administrative Law Division
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
Department of Homeland Security

Tel: (202) 732 (b)(6);(b)

(b)(6);(b)(7)(C)

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Sent: Tuesday, June 12, 2018 11:04 AM

Subject: RE: Chen v. GEO Touhy

Nice job with the draft. I do not have anything to add that did not already address.

Regards,

Associate Legal Advisor

Detention and Removal Law Section Enforcement and Removal Operations Law Division

Office of the Principal Legal Advisor

DHS U.S. Immigration and Customs Enforcement

(office) 202 - 44(cell)

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From: (b)(6);(b)(7)(C)

Sent: Tuesday, June 12, 2018 10:40 AM

Subject: RE: Chen v. GEO Touhy

a few suggested edits and comments are attached.

Associate Legal Advisor

District Court Litigation Division Office of the Principal Legal Advisor

U.S. Immigration & Customs Enforcement 202-73 (b)(6)(b) (desk) | 202-875-(b)(6)(f) (cell)

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From ^{(b)(6);(b)(7)(C)}	
Sent: Monday, June 11, 2018 6:07 PM	
(b)(6);(b)(7)(C)	
Subject: RE: Chen v. GEO Touhy	
Hi all,	
(b)(5)	
p)(5)	
	ŀ
(b)(5)	
(b)(5)	

Thanks all.

(b)(6);(b)(7)(C)

Associate Legal Advisor Government Information Law Division Office of the Principal Legal Advisor

U.S. Immigration and Customs Enforcement

Office: (202) 732-20(6)(6)(7)(Cell: (202) 57:

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From: (b)(6);(b)(7)(C)

Sent: Tuesday, June 5, 2018 2:03 PM

Subject: RE: DOJ Point of Contact

Thanks just left you another I am in most of the afternoon when you have time.

BTW, we (b)(5)

Also, given (b)(6)(b)(7)(C) question below, we are also interested in (b)(5)

(b)(5)

Talk to you soon,

(b)(6);(b)(7)(C)

(b)(6);(b)(7)(C) Associate Legal Advisor

District Court Litigation Division

Office of the Principal Legal Advisor
U.S. Immigration & Customs Enforcement
202-732000 (desk) | 202-875-606 (cell)

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From: **Sent:** Tuesday, June 05, 2018 1:44 PM Subject: RE: DOJ Point of Contact Importance: High All: I just got off the phone with (b)(6)(b) The subpoena for (b)(6)(b) where objections are due today, is withdrawn. You do not have to respond to it. (0)(6) understands (0)(6)(0) is no longer employed by ICE, as such, she meant for the two subsequent subpoena's, for (b)(6)(b)(7)(C) to replace the (0)(6),(0)(subpoena. She has agreed to (b)(5) (c) there are addition is that I need to discuss with you regarding this case. Please call me when you can. 206-553-From: (b)(6);(b)(7)(C) **Sent:** Tuesday, June 05, 2018 9:37 AM Subject: FW: DOJ Point of Contact I just left you a voicemail message on this. We are hopeful that you spoke t yesterday, and (b)(5) We are working on a substantive (i.e. Touhy) response to the Many thanks, Associate Legal Advisor **District Court Litigation Division** Office of the Principal Legal Advisor

U.S. Immigration & Customs Enforcement

202-73 7/C) desk) | 202-875 107/C (cell)

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From: \(\big(b \)(6);(b)(7)(C)

Sent: Tuesday, June 05, 2018 12:31 PM

 $To^{(b)(6);(b)(7)(C)}$

Cc:

Subject: FW: DOJ Point of Contact



Has a decision been made (b)(5)

(b)(6);(b)(7)(C)

Fron (b)(6);(b)(7)(C)

Sent: Tuesday, June 05, 2018 9:12 AM

To:(b)(6);(b)(7)(C)

Subject: DOJ Point of Contact

Can you please provide me the contact information for the attorney who will be appearing to represent these ICE officials on June 25th?

(b)(6);(b)(7)(C)

III Branches Law, PLLC 1019 Regents Blvd. Ste. (5)(6)(1) Fircrest, WA 98466 253-566 (0)(6)(1) (p) 281-664-4643 (f)

(b)(6);(b)(7)(C)

Sent: 12 Jun 2018 19:18:22 +0000

To: (b)(6);(b)(7)(C)

Subject: RE: Chen v. GEO Touhy

For now, I am (b)(5)

(b)(5)

(b)(5) Thanks!

(b)(6);(b)(7)(C)

Associate Legal Advisor Government Information Law Division Office of the Principal Legal Advisor

U.S. Immigration and Customs Enforcement

Office: (202) 732-(b)(6):(b)(7) Cell: (202) 573-(b)(6):(b)(7)

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From (b)(6);(b)(7)(C)

Sent: Tuesday, June 12, 2018 3:17 PM

b)(6);(b)(7)(C)

Subject: RE: Chen v. GEO Touhy

I can ask about this when (b)(6);(b)(7)(C) and I talk with ERO HQ, but I have a feeling we may need (b)(5)

b)(5) If you would like, I can email them.

(b)(6);(b)(7)(C

Associate Legal Advisor

Detention and Removal Law Section

Enforcement and Removal Operations Law Division

Office of the Principal Legal Advisor

DHS U.S. Immigration and Customs Enforcement

202-732-(b)(6);(b office) 202-441-(7)(C) cell)

(b)(6);(b)(7)(C)

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From (b)(6);(b)(7)(C)

Sent: Tuesday, June 12, 2018 2:18 PM
(b)(6);(b)(7)(C)

Subject: RE: Chen v. GEO Touhy

BTW, it would be good to know (b)(5)
(b)(5)

(h)(6):(h)(7)(C

ssociate Legal Advisor

District Court Litigation Division

Office of the Principal Legal Advisor U.S. Immigration & Customs Enforcement 202-732-006 (desk) | 202-875-006 (cell)

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From (b)(6);(b)(7)(C)

Sent: Tuesday, June 12, 2018 1:48 PM
(b)(6);(b)(7)(C)

Cc: (b)(6);(b)(7)(C)

Subject: RE: Chen v. GEO Touhy

Thanks (b)(6);(b)(7)(C)

In the event that we cannot figure out (b)(5)
(b)(5)

(b)(6);(b)(7)(C)

Associate Legal Advisor
Government Information Law Division
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement

Office: (202) 732-(0)(6)(6) Cell: (202) 573(0)(6)(6)(

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From: (b)(6);(b)(7)(C)

Sent: Tuesday, June 12, 2018 1:38 PM

To: (b)(6);(b)(7)(C)

Cc:

Subject: RE: Chen v. GEO Touhy

(b)(6);(b)(7)(C

(b)(5) (b)(5)

I'm teleworking

today due to the Caps parade so if you'd like to discuss anything, please feel free to email or call on my cell 202-210-(0)(6)(0)(

Also, I (b)(5)

(b)(5)

Best,

(b)(6);(b)(7)(C)

Associate Legal Advisor
Commercial and Administrative Law Division
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
Department of Homeland Security

Tel: (202) 732(b)(6);(b)(7)(

b)(6);(b)(7)(C)

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From: (b)(6);(b)(7)(C)

Sent: Tuesday, June 12, 2018 11:04 AM

To(b)(6);(b)(7)(C)

Cc

(D)(O);(D)(7)(C)

Subject: RE: Chen v. GEO Touhy

(b)(6);(b)(7)(C)

Nice job with the draft. I do not have anything to add that hot already address.

Regards,

(b)(6);(b)(7)(C)

Associate Legal Auvisol

Detention and Removal Law Section Enforcement and Removal Operations Law Division Office of the Principal Legal Advisor DHS U.S. Immigration and Customs Enforcement

202-732 (b)(6);((office) 202-441 (cell)

(b)(6):(b)(7)(C)

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From: (b)(6);(b)(7)(C)

Sent: Tuesday, June 12, 2018 10:40 AM

(b)(6);(b)(7)(C)

*** Warning *** Attorney/Client Privilege *** Attorney Work Product ***

Subject: RE: Chen v. GEO Touhy

Thanks 70(6)(0) a few suggested edits and comments are attached.



(b)(6);(b)(7)(C)

Associate Legal Advisor

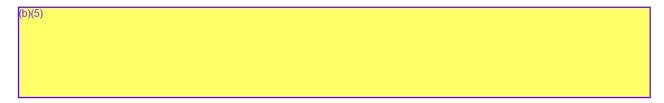
District Court Litigation Division

Office of the Principal Legal Advisor U.S. Immigration & Customs Enforcement 202-732(b)(6)(b)(d(desk) | 202-875-(0)(6))(c(cell))

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From: (b)(6);(b)(7)(C)	
Sent: Monday, June 11, 2018 6:07 PM (b)(6);(b)(7)(C)	
(b)(o),(b)(r)(c)	
Subject: RE: Chen v. GEO Touhy	
Hi all,	
(b)(5)	
(b)(3)	
(b)(5)	



Thanks all.

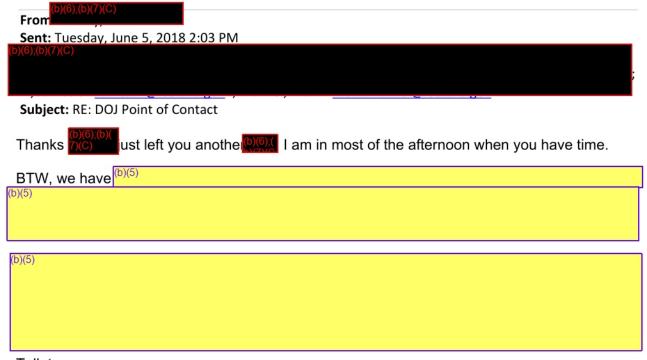
(b)(6);(b)(7)(C)

Associate Legal Advisor
Government Information Law Division
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement

Office: (202) 732(0)(6)(1) Cell: (202) 573-(0)(6)(6)(1)

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Talk to you soon,

<u>VZVC)</u>	
(b)(6);(b)(7)(C) Associate Legal Advisor	
District Court Litigation Division	
Office of the Principal Legal Advisor	
U.S. Immigration & Customs Enforcement	
202-732- <mark>(b)(6)((</mark> (desk) 202-875 <mark>(b)(6)()</mark> (cell)	
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From (b)(6);(b)(7)(C)	
Sent: Tuesday, June 05, 2018 1:44 PM	
(b)(6);(b)(7)(C)	
Subject: RE: DOJ Point of Contact	
Importance: High	
All: I just got off the phone with (b)(6): The subpoena for where objections are due today, is	
withdrawn. You do not have to respond to it. (b)(6)(b) nderstands (b)(6)(b)(is no longer employed by ICE,	
as such, she meant for the two subsequent subpoena's, fo $(b)(6)(b)(7)(C)$ to replace the $(b)(6)(b)(1)(1)$	
subpoena.	
(b)(5)	_
(e)(e)	
there are additional details that I need to discuss with you regarding this case. Please call me when	1
you can. 206-553(b)(6):((b)(6):(b)(7)(
From: (b)(6);(b)(7)(C)	
Sent: Tuesday, June 05, 2018 9:37 AM	
(b)(6);(b)(7)(C)	
Subjects FW/s DOL Beint of Contact	
Subject: FW: DOJ Point of Contact	
6);(b)(7)(C)	
(b)(6);(b)(7)(C)	
I just left you a voicemail message on this. We are hopeful that you spoke to	
yesterday, and that (b)(5)	
(b)(5)	
We are working on a substantive (i.e. Touhy) response	

Many thanks,



Associate Legal Advisor

District Court Litigation Division

Office of the Principal Legal Advisor U.S. Immigration & Customs Enforcement 202-732 (b)(6)((desk) | 202-875 (cell)

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From:

Sent: Tuesday, June 05, 2018 12:31 PM

Subject: FW: DOJ Point of Contact

Has a decision been made on these subpoenas?

Sent: Tuesday, June 05, 2018 9:12 AM

Subject: DOJ Point of Contact

Can you please provide me the contact information for the attorney who will be appearing to represent these ICE officials on June 25th?

III Branches Law, PLLC 1019 Regents Blvd. Ste. 204 Fircrest, WA 98466 253-566^{(b)(6),(}(p) 664-4643 (f)

brancheslaw.com

(b)(6);(b)(7)(C)

Sent: 12 Jun 2018 19:12:27 +0000

To: (b)(6);(b)(7)(C)

Cc:

Subject: RE: Chen v. GEO Touhy

Sorry, folks, I was trying to listen to this afternoon's OIL presentation. Thanks for attaching the emails regarding (b)(5)

(b)(5)

Regards,

Associate Legal Advisor Detention and Removal Law Section

Enforcement and Removal Operations Law Division

Office of the Principal Legal Advisor

DHS U.S. Immigration and Customs Enforcement

202-732-(b)(6)(f)(c) office) 202-441-(c)(7)(C) cell)

(b)(6);(b)(7)(C)

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From: N(b)(6);(b)(7)(C)

Sent: Tuesday, June 12, 2018 1:38 PM

To: (b)(6); (b)(7)(C)

Cc:

Subject: RE: Chen v. GEO Touhy

Hi (b)(6);(b)(7)(C)

I made a number of edits. I know you said (b)(5)

(b)(5)

Also, I asked (b)(5)

(b)(5)

Best,

(b)(6);(b)(7)(C)

Associate Legal Advisor Commercial and Administrative Law Division Office of the Principal Legal Advisor U.S. Immigration and Customs Enforcement Department of Homeland Security

Tel: (202) 732(b)(6):(

(b)(6);(b)(7)(C)

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From:(b)(6);(b)(7)(C)

Sent: Tuesday, June 12, 2018 11:04 AM

To:(b)(6);(b)(7)(C)

Cc:

)(U),(U),(U),(U)

Subject: RE: Chen v. GEO Touhy

(b)(6);(b)(7)(C)

Nice job with the draft. I do not have anything to add that the draft id not already address.

Regards,

(b)(6);(b)(7)(C)

Associate Legal Advisor
Detention and Removal Law Section
Enforcement and Removal Operations Law Division
Office of the Principal Legal Advisor
DHS U.S. Immigration and Customs Enforcement
202-732 (0)(6)(0) pffice)



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From: (b)(6);(b)(7)(C)

Sent: Tuesday, June 12, 2018 10:40 AM

Subject: RE: Chen v. GEO Touhy

Thanks , a few suggested edits and comments are attached.

(b)(6);(b)(7)(C

(b)(6);(b)(7)(C) Associate Legal Advisor

District Court Litigation Division

Office of the Principal Legal Advisor U.S. Immigration & Customs Enforcement 202-732-[0](6] (desk) | 202-875-[0](6) (cell)

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From: (b)(6);(b)(7)(C)

Sent: Monday, June 11, 2018 6:07 PM

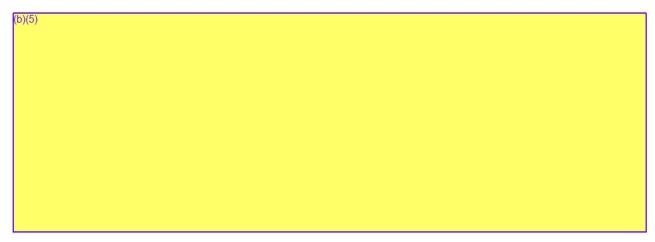
Subject: RE: Chen v. GEO Touhy

Hi all,

(b)(5)







Thanks all.

(b)(b);(b)(7)(C)

Associate Legal Advisor
Government Information Law Division
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement

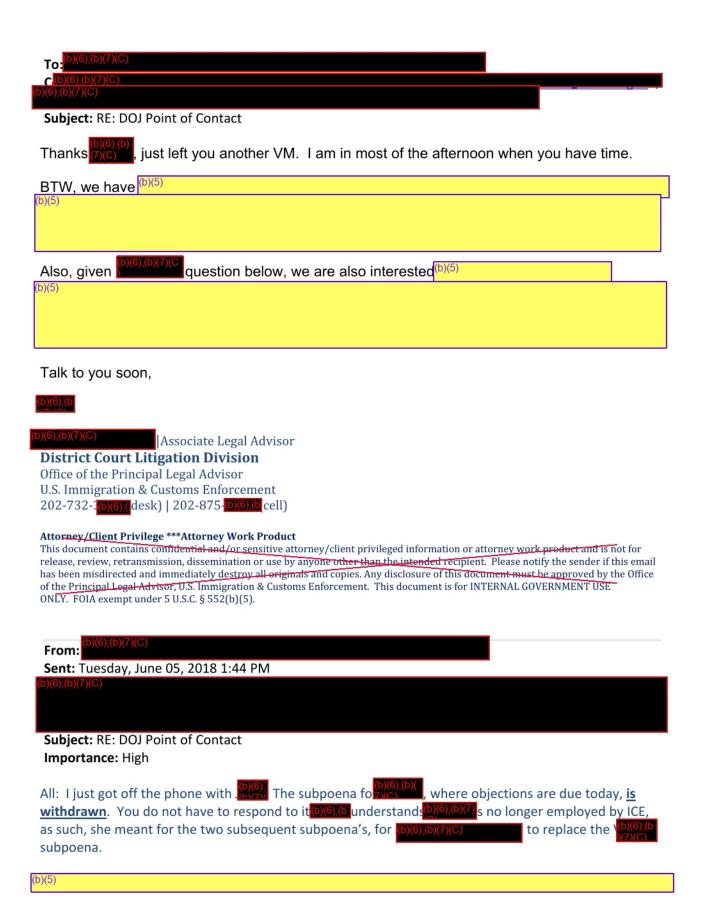
Office: (202) 732^{(b)(6);(b)(}Cell: (202) 573-0

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Fror(b)(6);(b)(7)(C)

Sent: Tuesday, June 5, 2018 2:03 PM



Rob, there are additional details that I need to discuss with you regarding this case. Please call me when you can. 206-553-(0)(6)(6)

From: (b)(6);(b)(7)(C)

Sent: Tuesday, June 05, 2018 9:37 AM

(b)(6);(b)(7)(C)

Subject: FW: DOJ Point of Contact

(b)(6);(b)(7)(

I just left you a voicemail message on this. We are hopeful that you spoke to vesterday, and that she agreed (b)(5)

(b)(5)

We are working on a substantive (i.e. Touhy) response (b)(5)

(b)(5)

Many thanks,

(b)(6);(b)(

(b)(6);(b)(7)(C) | Associate Legal Advisor

District Court Litigation Division

Office of the Principal Legal Advisor U.S. Immigration & Customs Enforcement

202-732(b)(6);((desk) | 202-875(b)(6);(b cell)

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(b)(6):(b)(7)(C)

Sent: Tuesday, June 05, 2018 12:31 PM

To: (b)(6);(b)(7)(C)

Cc:

Subject: FW: DOJ Point of Contact

(b)(6); /b)/7)

Has a decision been made on these subpoenas?

(b)(6);(b) (7)(C)

Sent: Tuesday, June 05, 2018 9:12 AM

To: \((b)(6);(b)(7)(C)

Subject: DOJ Point of Contact

Can you please provide me the contact information for the attorney who will be appearing to represent these ICE officials on June 25th?

(b)(6);(b)(7)(C)

III Branches Law, PLLC 1019 Regents Blvd. Ste. 204 Fircrest, WA 98466 253-566 (p) (p) 281-664-4643 (f)

(b)(6);(b)(7)(3brancheslaw.com

Sent: 12 Jun 2018 18:42:29 +0000

To: (b)(6);(b)(7)(C)

Cc:

Subject: RE: Chen v. GEO Touhy

Thanks (b)(6);(b)(7)

I am going to make the changes suggested by the team and make some edits. I also wanted to (b)(5)

(b)(5)

The response is due tomorrow. I would like to get it out today if possible, assuming my chief can review it. I can keep you posted. Would you like me to send the response directly to the total to the response directly to the total tot

(b)(5)

(b)(6);(b)(7)(C)

Associate Legal Advisor
Government Information Law Division
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement

Office: (202) 732 (202) 732 (202) 732 (202) 573 (202) 573 (202) (202) 673 (2

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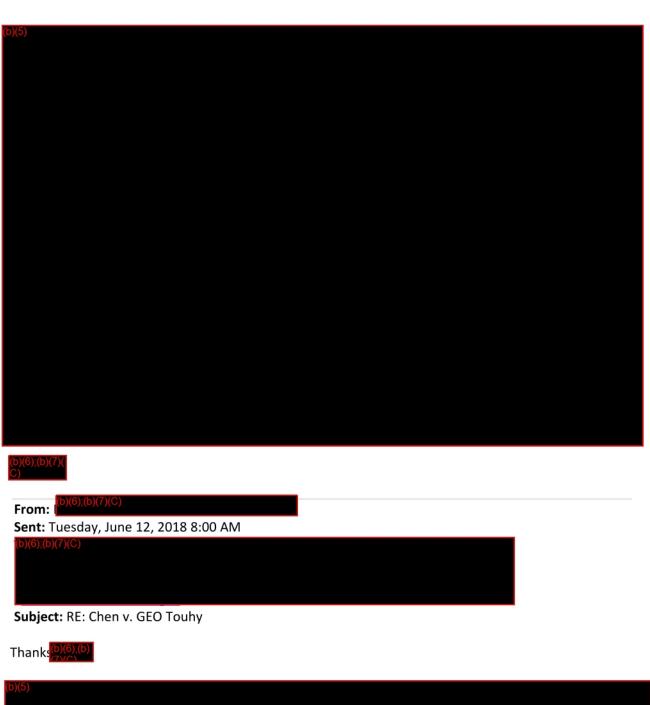
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Fron (b)(6);(b)(7)(C)

Sent: Tuesday, June 12, 2018 2:24 PM

(b)(6);(b)(7)(C

Subject: RE: Chen v. GEO Touhy





(b)(6);(b)(7)(C)

Associate Legal Advisor
Government Information Law Division
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement

Office: (202) 732-5013 Cell: (202) 573-0154

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From: (b)(6);(b)(7)(C)

Sent: Tuesday, June 12, 2018 10:40 AM

(0)(0),(0)(1)(0)

Subject: RE: Chen v. GEO Touhy

Fhanks (0)(6)(0) a few suggested edits and comments are attached.

(b)(6);(b)(7)(C

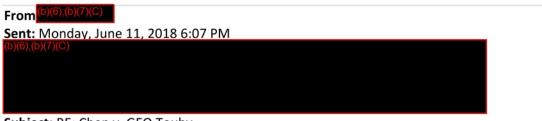
Associate Legal Advisor

District Court Litigation Division

Office of the Principal Legal Advisor U.S. Immigration & Customs Enforcement 202-732 (desk) | 202-87 (cell)

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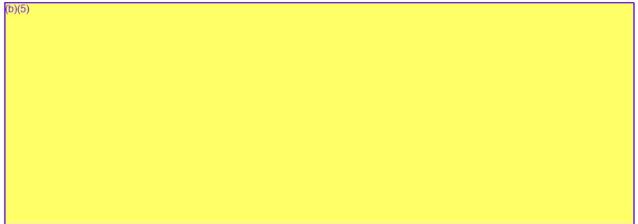
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Subject: RE: Chen v. GEO Touhy

Hi all,





Thanks all.

Associate Legal Advisor **Government Information Law Division** Office of the Principal Legal Advisor U.S. Immigration and Customs Enforcement

Office: (202) 732(b)(6);(b)

Cell: (202) 57:(b)(6);(b)(7)

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From: (b)(6);(b)(7)(C) Sent: Tuesday, June 5, 2018 2:03 PM
(b)(6);(b)(7)(C)
Subject: RE: DOJ Point of Contact
Thank just left you another VM. I am in most of the afternoon when you have time.
BTW, we have been given (b)(5)
(0)(3)
Also, given (b)(6)(b)(7)(C) question below, we are also interested (b)(5)
(b)(5)

Talk to you soon,



(b)(6);(b)(7)(C) Associate Legal Advisor

District Court Litigation Division

Office of the Principal Legal Advisor U.S. Immigration & Customs Enforcement 202-732 (b)(6),((desk) | 202-875-(0)(6),((cell)

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From (b)(6);(b)(7)(C) Sent: Tuesday, June 05, 2018 1:44 PM Subject: RE: DOJ Point of Contact Importance: High All: I just got off the phone with . The subpoena for where objections are due today, is withdrawn. You do not have to respond to it. b)(7)(C understands (b)(6)(b)(f)(c) s no longer employed by ICE, as such, she meant for the two subsequent subpoena's, for this provides to replace the (b)(6)(b) subpoena. She has agreed (b)(5) there are additional details that I need to discuss with you regarding this case. Please call me when you can. 206-553-From: **Sent:** Tuesday, June 05, 2018 9:37 AM Cc Subject: FW: DOJ Point of Contact I just left you a voicemail message on this. We are hopeful that you spoke to yesterday, and that she agreed (b)(5) We are working on a substantive (i.e. Touhy) response to (b)(5) Many thanks, Associate Legal Advisor **District Court Litigation Division** Office of the Principal Legal Advisor U.S. Immigration & Customs Enforcement 202-732-(b)(6) (desk) | 202-875-(b)(6);(cell)

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From: \(\frac{(b)(6);(b)(7)(C)}{}

Sent: Tuesday, June 05, 2018 12:31 PM

To (b)(6);(b)(7)(C)

Cc:

Subject: FW: DOJ Point of Contact

(b)(6);(b

Has a decision been made on these subpoenas?

(b)(6);(b)(7)(

From: (b)(6);(b)(7)(C)

Sent: Tuesday, June 05, 2018 9:12 AM

To: (b)(6);(b)(7)(C)

Subject: DOJ Point of Contact

Can you please provide me the contact information for the attorney who will be appearing to represent these ICE officials on June 25th?

(b)(6);(b)(7)(C)

III Branches Law, PLLC 1019 Regents Blvd. Ste (D)(6)(1) Fircrest, WA 98466 253-566 (D)(6) (p) 281-664-4643 (f)

D)(0),(D)(1)(C)

Sent: 12 Jun 2018 18:41:14 +0000

To: (b)(6);(b)(7)(C)

Cc:

Subject: RE: Chen v. GEO Touhy



1/71/01

(b)(6);(b)(7)(C)

Associate Legal Advisor

District Court Litigation Division

Office of the Principal Legal Advisor U.S. Immigration & Customs Enforcement 202-732 (b)(6)(b) desk) | 202-875 (c)(6)(b)(c) ell)

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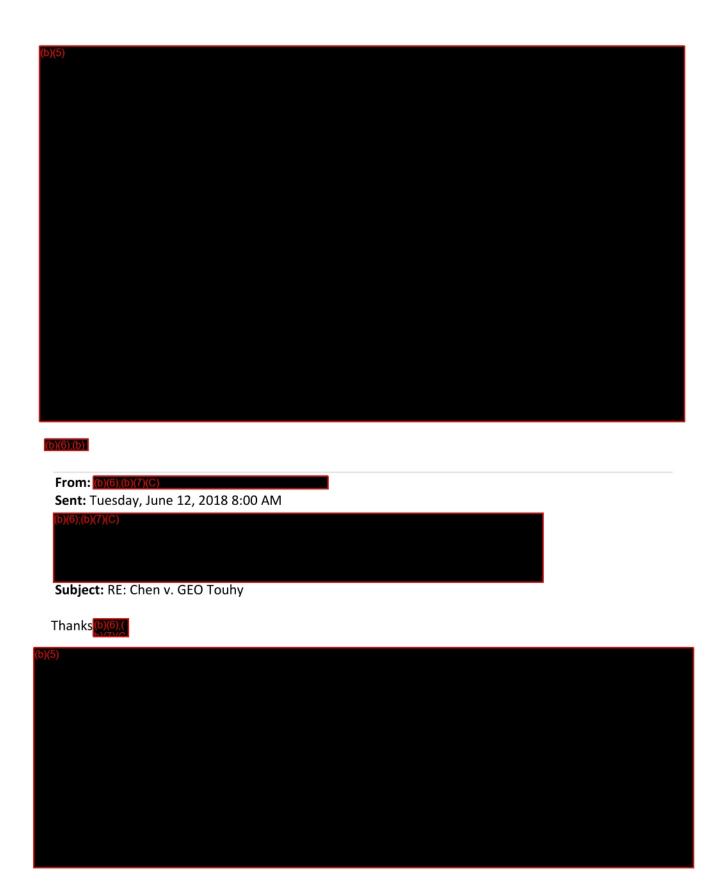
From (b)(6);(b)(7)(C)

Sent: Tuesday, June 12, 2018 2:24 PM

b)(6);(b)(7)(C

Subject: RE: Chen v. GEO Touhy

All: This is a very well-written and complete response. Very nicely done getting everything in there and tying the objections to the specific requests in the subpoenas.



think those were the two substantive issues that ointed out and I just wanted to flag them for you. Let me know your thoughts so that I can finalize the draft. Thanks all!

(b)(6);(b)(7)(C)

Associate Legal Advisor Government Information Law Division Office of the Principal Legal Advisor U.S. Immigration and Customs Enforcement

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(b)(6);(b)(7)(C)

Sent: Tuesday, June 12, 2018 10:40 AM

To (b)(6);(b)(7)(C)

(D)(6);(D)(7)(C)

Subject: RE: Chen v. GEO Touhy

Thanks (0)(6)(0), a few suggested edits and comments are attached.

(b)(6); (b)(7)(

(b)(6);(b)(7)(C) | Associate Legal Advisor

District Court Litigation Division

Office of the Principal Legal Advisor U.S. Immigration & Customs Enforcement 202-732 (0.6) ((desk) | 202-875 (0.6) (b) rell)

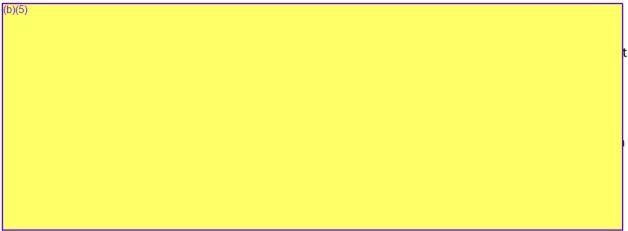
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Hi all,





Thanks all.

(b)(6);(b)(7)(C)

Associate Legal Advisor Government Information Law Division Office of the Principal Legal Advisor U.S. Immigration and Customs Enforcement

Office: (202) 732-.(0)(6); Cell: (202) 573(0)(6);(6

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Talk to you soon,

(b)(6);(b)(7)(C

Associate Legal Advisor

District Court Litigation DivisionOffice of the Principal Legal Advisor

U.S. Immigration & Customs Enforcement 202-732-(0)6)((desk) | 202-875-(0)6)((cell)

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From (D)(D)(D)(7)(C)

Sent: Tuesday, June 05, 2018 1:44 PM

To (b)(6);(b)(7)(C)

Subject: RE: DOJ Point of Contact Importance: High All: I just got off the phone wit The subpoena for where objections are due today, is withdrawn. You do not have to respond to it. (b)(6); understands (b)(6)(b)(c) s no longer employed by ICE, as such, she meant for the two subsequent subpoena's, for (0)(6)(0)(7)(C) to replace the (b)(6):(b) subpoena. She has agreed (b)(5) (b)(6)(there are additional details that I need to discuss with you regarding this case. Please call me when you can. 206-553-(b)(6); (b)(6);(b) From: Sent: Tuesday, June 05, 2018 9:37 AM Cc: Subject: FW: DOJ Point of Contact I just left you a voicemail message on this. We are hopeful that you spoke to yesterday, and that she agreed to (b)(5) (b)(5)We are working on a substantive (i.e. Touhy) response to (b)(5) Many thanks, Associate Legal Advisor **District Court Litigation Division** Office of the Principal Legal Advisor U.S. Immigration & Customs Enforcement 202-732-(0)(6); (desk) | 202-875-:(0)(6); (cell) Attorney/Client Privilege ***Attorney Work Product This document contains confidential and/or sensitive attorney/client privileged information or attorney work product and is not for

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From: (b)(6):(b)(7)(C)

Sent: Tuesday, June 05, 2018 12:31 PM

To: (b)(6);(b)(7)(C)

Cc: F

Subject: FW: DOJ Point of Contact



Has a decision been made on these subpoenas?



From: (b)(6);(b)(7)(C)

Sent: Tuesday, June 05, 2018 9:12 AM

T(b)(6);(b)(7)(C)

Subject: DOJ Point of Contact

Can you please provide me the contact information for the attorney who will be appearing to represent these ICE officials on June 25th?

(b)(6);(b)(7)(C)

III Branches Law, PLLC 1019 Regents Blvd. Ste. 204 Fircrest, WA 98466 253-566 (b)(6)(b) 281-664-4643 (f)

(1) (b)(6);(b)(7)(1)(3brancheslaw.com From: (b)(6);(b)(7)(C

Sent: 12 Jun 2018 16:50:03 +0000

To: (b)(6):(b)(7)(C)

Subject: RE: Detainee grievance process

(b)(5)

(b)(6);(b)(7)(C)

Deputy Assistant Director
DHS/ICE/ERO/Custody Programs

Desk: 202.732. (b)(6)(1) [phone: 202.431 (b)(6)(1)

(b)(6);(b)(7)(C)

From (b)(6);(b)(7)(C)

Sent: Tuesday, June 12, 2018 12:47 PM

D)(b)(b)(7)(C)

Subject: FW: Detainee grievance process

Hello (b)(6);(b)(7)(C)

I was probably referencing the DRIL (the hotline detainees can call with questions or complaints).

Notably there (b)(5)

(b)(5

So there are multiple ways for detainees to communicate with ICE.

copied here are the DRIL SMEs and could probably answer your questions.

(b)(6):(

From (b)(6);(b)(7)(C)

Sent: Tuesday, June 12, 2018 12:43 PM

To(b)(6);(b)(7)(C)

Subject: Detainee grievance process

H (b)(6);(b)(7)

In a conversation a couple months ago regarding the Voluntary Work Program, I recall (b)(5)

b)(5)

Thanks,

(b)(6);(b)(7)(C)

Associate Legal Advisor
Commercial and Administrative Law Division
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
Department of Homeland Security

Tel: (202) 732-(b)(6);(

(b)(6);(b)(7)(C)

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From: (b)(6);(b)(7)(0

Sent: 12 Jun 2018 22:34:23 +0000

To: (b)(6);(b)(7)(C)

/h\/6\·/h\/7\/C\

Subject: RE: Chen v. GEO Touhy

Great thanks!

Sent with BlackBerry Work (www.blackberry.com)

From: (b)(6);(b)(7)(C)

Date: Tuesday, Jun 12, 2018, 6:33 PM

(b)(6);(b)(7)(C)

Subject: RE: Chen v. GEO Touhy

Sure. Its: (b)(6);(b)(7)(C rancheslaw.com

From: (b)(6);(b)(7)(C

Sent: Tuesday, June 12, 2018 3:23 PM

(b)(6);(b)(7)(C)

Subject: RE: Chen v. GEO Touhy

Okay, will do and will try to send it sometime tonight so that she has time to review it and you can have a talk with her tomorrow. I believe that I have her email address in one of the emails you forwarded at one point but can you just send it to me so that I make sure that I send it to the correct place? Thanks!

Sent with BlackBerry Work (www.blackberry.com)

From: (b)(6);(b)(7)(C)

Date: Tuesday, Jun 12, 2018, 6:18 PM

D)(0),(D)(1)(C

Subject: RE: Chen v. GEO Touhy

Fron(b)(6);(b)(7)(C)

Sent: Tuesday, June 12, 2018 3:09 PM

(b)(6);(b)(7)(C)

Subject: RE: Chen v. GEO Touhy

Sure. No problem! Just keep me posted.

Sent with BlackBerry Work (www.blackberry.com)

From: (b)(6);(b)(7)(C)

Date: Tuesday, Jun 12, 2018, 6:06 PM

)(6);(b)(7)(C)

Subject: RE: Chen v. GEO Touhy

Thanks for incorporating a number of my comments from earlier. I sent this final version

to (b)(5)

(b)(5)

I think we are still waiting to hear from bout whether she or ICE will send the letter so I think we have a little bit more time.

Best,

(b)(6);(b)(7)(C)

Associate Legal Advisor Commercial and Administrative Law Division Office of the Principal Legal Advisor U.S. Immigration and Customs Enforcement

Department of Homeland Security

Tel: (202) 732 (b)(6);(b)

(b)(6);(b)(7)(C)

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From:

Sent: Tuesday, June 12, 2018 5:59 PM

b)(6),(b)(7)(C)

Subject: RE: Chen v. GEO Touhy

(b)(6);(b)(7)(C)

I had to review it quickly since I have somewhere to be at 6:00 PM; however, I agree with nice job on all the revisions.

Regards,

(b)(6);(b)(7)(C)

(b)(6):(b)(7)(C)

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From: (b)(6),(b)(7)(C)

Sent: Tuesday, June 12, 2018 5:47 PM

.

Subject: RE: Chen v. GEO Touhy

, looks great to me. Thanks for all your work on it.

(b)(6);(

(b)(6);(b)(7)(C)

Associate Legal Advisor

District Court Litigation Division

Office of the Principal Legal Advisor U.S. Immigration & Customs Enforcement 202-732-(0)(6) (desk) | 202-875-(0)(6) (cell)

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From (b)(6);(b)(7)(C) Sent: Tuesday, June 12, 2018 5:43 PM (b)(6);(b)(7)(C)

Subject: RE: Chen v. GEO Touhy

Hi all,



(b)(6);(b)(7)(C)

Associate Legal Advisor
Government Information Law Division

Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement

Office: (202) 732(b)(6)(b)(7) Cell: (202) 573-0

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(b)(6);(b)(7)(C)

From

Sent: Tuesday, June 12, 2018 2:24 PM
(b)(6);(b)(7)(C)

Subject: RE: Chen v. GEO Touhy





From: (b)(6);(b)(7)(C)

Sent: Tuesday, June 12, 2018 8:00 AM

b)(6);(b)(7)(C)

Subject: RE: Chen v. GEO Touhy

Thanks (b)(6)



(b)(6);(b)(7)(C)

Associate Legal Advisor
Government Information Law Division
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement

Office: (202) 732 (6)(6)(b)(7) Cell: (202) 573 (6)(6)(b)(7)

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From: (b)(6);(b)(7)(C)

Sent: Tuesday, June 12, 2018 10:40 AM



Subject: RE: Chen v. GEO Touhy

Thanks are attached.



(b)(6),(b)(7)(C) | Associate Legal Advisor

District Court Litigation Division

Office of the Principal Legal Advisor
U.S. Immigration & Customs Enforcement
202-732 (b)(6)((desk) | 202-875-163/6 (cell)

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From: (b)(6);(b)(7)(C)

Sent: Monday, June 11, 2018 6:07 PM
(b)(6);(b)(7)(C)

Subject: RE: Chen v. GEO Touhy

Hi all,





I have included information on the applicable statute and appropriations act that governs the \$1.00 provision. (b)(5)

(b)(5)

(b)(5)

Thanks all.

(b)(6);(b)(7)(C)

Associate Legal Advisor
Government Information Law Division
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement

Office: (202) 737676767 Cell: (202) 573 (0)(6)(0)(

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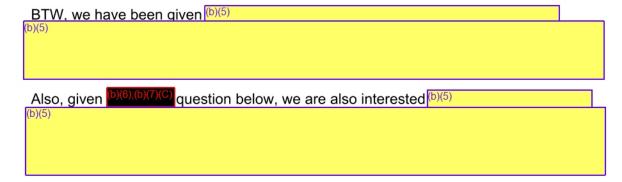
From: (b)(6);(b)(7)(C

Sent: Tuesday, June 5, 2018 2:03 PM

(b)(6);(b)(7)(C)

Subject: RE: DOJ Point of Contact

Thanks (0)(6)(6) just left you another VM. I am in most of the afternoon when you have time.



Talk to you soon,

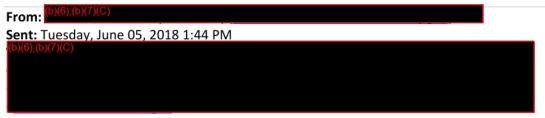


|Associate Legal Advisor | District Court Litigation Division

Office of the Principal Legal Advisor U.S. Immigration & Customs Enforcement 202-732-(6)(6)(desk) | 202-875-(6)(6)((cell)

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Subject: RE: DOJ Point of Contact

Importance: High

All: I just got off the phone with (b)(6):(The subpoena for where objections are due today, is withdrawn. You do not have to respond to it. (b)(6):(understands is no longer employed by ICE, as such, she meant for the two subsequent subpoena's, for (b)(6):(b)(7)(C) to replace the (b)(6):(b)(6):(b)(7)(C) subpoena.

She has agreed to (b)(5)

there are additional details that I need to discuss with you regarding this case. Please call me when you can. 206-553-(0)(6).

From: Sent: Tuesday, June 05, 2018 9:37 AM Subject: FW: DOJ Point of Contact I just left you a voicemail message on this. We are hopeful that you spoke to yesterday, and that she agreed to (b)(5) We are working on a substantive (i.e. Touhy) response to Many thanks, Associate Legal Advisor **District Court Litigation Division** Office of the Principal Legal Advisor U.S. Immigration & Customs Enforcement 202-732-(b)(6) (desk) | 202-875(c)(7)(7)(c) (cell) Attorney/Client Privilege ***Attorney Work Product This document contains confidential and/or sensitive attorney/client privileged information or attorney work product and is not for release, review, retransmission, dissemination or use by anyone other than the intended recipient. Please notify the sender if this email has been misdirected and immediately destroy all originals and copies. Any disclosure of this document must be approved by the Office of the Principal Legal Advisor, U.S. Immigration & Customs Enforcement. This document is for INTERNAL GOVERNMENT USE ONLY. FOIA exempt under 5 U.S.C. § 552(b)(5). Fron(b)(6);(b)(7)(C) **Sent:** Tuesday, June 05, 2018 12:31 PM To: Cc: Subject: FW: DOJ Point of Contact Has a decision been made on these subpoenas?

2018-ICLI-00052 4861

From:

Sent: Tuesday, June 05, 2018 9:12 AM

(b)(6);(b)(7)(C)

Subject: DOJ Point of Contact

Can you please provide me the contact information for the attorney who will be appearing to represent these ICE officials on June 25th?

(b)(6);(b)(7)(C)

III Branches Law, PLLC 1019 Regents Blvd. Ste. 204 Fircrest, WA 98466 253-566 (0)(6) (p) 281-664-4643 (f) 3brancheslaw.com (b)(6);(b)(7)(C

Sent: 12 Jul 2018 21:04:32 +0000

To: (b)(6);(b)(7)(C)

Cc: EROLD TASKINGS;OPLA Tasking

Subject: RE: 101350- RETASK 1- SES- S1 / Overview of Voluntary Work Program

Attachments: 101350 Combined ERO and OPLA.DOCX



I made a minor change on the attachment. I think it is now ready to submit. Please let me know if you have any questions or concerns.

Regards,

(b)(6);(b)(7)(C)

Associate Legal Advisor

Detention and Removal Law Section

Enforcement and Removal Operations Law Division

Office of the Principal Legal Advisor

DHS U.S. Immigration and Customs Enforcement

202-732(b)(6);(b)(office) 202-441()(7)(C) (cell)

(b)(6);(b)(7)(C)

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From: (b)(6);(b)(7)(C)

Sent: Thursday, July 12, 2018 4:33 PM

To: (b)(6);(b)(7)(C)

Cc: EROLD TASKINGS < EROLDTASKINGS@ice.dhs.gov>; OPLA Tasking < OPLATasking@ice.dhs.gov>

Subject: 101350- RETASK 1- SES- S1 / Overview of Voluntary Work Program

(b)(6);(b)(7)(C)

ERO's edits are attached. Let me know if we can send this up to SES. Thanks!

Sincerely,



Associate Legal Advisor

Executive Communications Unit Office of the Principal Legal Advisor U.S. Immigration and Customs Enforcement 500 12th St. SW

Washington, D.C., 20536 Office: (202)-732(0)6) Mobile: (202)-302-636



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Page 4865

Withheld pursuant to exemption

(b)(5);WIF Draft

of the Freedom of Information and Privacy Act

Page 4866

Withheld pursuant to exemption

WIF Draft;(b)(5)

of the Freedom of Information and Privacy Act

Page 4867

Withheld pursuant to exemption

(b)(5);WIF Draft

of the Freedom of Information and Privacy Act

From: (b)(6);(b)(7)(C)

Sent: 20 Aug 2018 16:24:00 +0000

To: (b)(6);(b)(7)(C

Cc:

(b)(6);(b)(7)(C

Subject: RE: Activity in Case 5:17-cv-02514-JGB-SHK Raul Novoa v. The GEO Group, Inc.

Subpoena Request (AO 88)

Attachments: withdrawal of subpoena.pdf

Good afternoon all,

I just checked the docket and Plaintiff's counsel withdrew his request for this subpoena. I am attaching the notice.

Thanks.

(b)(6);(b)(7)(C)

Associate Legal Advisor
Government Information Law Division
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement

Office: (202) 732(b)(6)(b) Cell: (202) 573-(b)(6)(b)

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From: (b)(6);(b)(7)(C)

Sent: Wednesday, August 15, 2018 1:01 PM

b)(6);(b)(7)(C

Subject: FW: Activity in Case 5:17-cv-02514-JGB-SHK Raul Novoa v. The GEO Group, Inc. Subpoena Request (AO 88)



(b)(5)



Sent with BlackBerry Work (www.blackberry.com)

From: Johnson, Tae D <Tae.D.Johnson@ice.dhs.gov>

Date: Wednesday, Aug 15, 2018, 12:23 PM

Subject: FW: Activity in Case 5:17-cv-02514-JGB-SHK Raul Novoa v. The GEO Group, Inc. Subpoena Request (AO 88)

FYSA

Sent with BlackBerry Work (www.blackberry.com)

From: (b)(6);(b)(7)(C)

Date: Wednesday, Aug 15, 2018, 9:11 AM

To: Davis, Mike P (b)(6);(b)(7)(C) Johnson, Tae D (b)(6);(b)(7)(C)

Subject: Activity in Case 5:17-cv-02514-JGB-SHK Raul Novoa v. The GEO Group, Inc. Subpoena Request (AO

88)

Forwarding this for your S/A in the event you haven't seen it. We did see the draft to the first CA AG letter. Thanks. I know you're likely still working through the longer one.

Regards,

(b)(6);(b)(7)(C)

EXECUTIVE VICE PRESIDENT, CONTRACT COMPLIANCE

The GEO Group, Inc. ®
One Park Place, Suit(INA) 621 NW 53rd Street

Boca Raton, Florida 33487

Tel: 561 999 (0)(6) • Fax: 561 999 7745

Mobile: 561 465(b)(6) (b)(6);(b)(7)(geogroup.com www.geogroup.com

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