

From: (b)(6);(b)(7)(C)
Sent: 17 Oct 2018 21:50:41 +0000
To: (b)(6);(b)(7)(C)
Subject: FW: Raul Novoa v. The GEO Group, Inc., CV 17-2514 - Request for Inspection of GEO's Adelanto Facility

Hi guys,

I will leave this for you to address. I provided the contact information to get the process started since the AUSA was out, but other than that this is beyond GILD's purview. Thanks.

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

Associate Legal Advisor
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Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement
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From: (b)(6);(b)(7)(C)
Sent: Wednesday, October 17, 2018 5:43 PM
To: (b)(6);(b)(7)(C)
Cc: (b)(6);(b)(7)(C)
Subject: FW: Raul Novoa v. The GEO Group, Inc., CV 17-2514 - Request for Inspection of GEO's Adelanto Facility

Here is the email chain between GEO and their attorney regarding the inspection party at Adelanto.

Thanks,

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

(b)(6);(b)(7)(C) **Deputy Chief Counsel**
Office of Chief Counsel – Los Angeles

U.S. Immigration and Customs Enforcement
10250 Rancho Road
Adelanto, California 92301

Email: (b)(6);(b)(7)(C)
Phone: (760) 561-(b)(6);(b)(7)(C) Fax: (760) 530-9065

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From: (b)(6);(b)(7)(C)
Sent: Wednesday, October 17, 2018 1:05 PM
To: (b)(6);(b)(7)(C)
(b)(6);(b)(7)(C)
Subject: FW: Raul Novoa v. The GEO Group, Inc., CV 17-2514 - Request for Inspection of GEO's Adelanto Facility

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

I am not sure what , if any, position ERO wants to take regarding the Plaintiff's attorneys request to "inspect" the Adelanto ICE Processing Center. I am concerned about the use of video and photography equipment in the facility. Once video and photos are in their hands, we will not be able to prevent the placement of video or photos on the internet. This could result in security risks that would be difficult to mitigate.

(b)(6);(b)(7)(C)
Assistant Field Office Director
Adelanto ICE Processing Center
Los Angeles Field Office
(760)561-(b)(6);(b)(7)(C)

From: (b)(6);(b)(7)(C)
Sent: Wednesday, October 17, 2018 12:32 PM
To: (b)(6);(b)(7)(C)
Cc:
Subject: Fw: Raul Novoa v. The GEO Group, Inc., CV 17-2514 - Request for Inspection of GEO's Adelanto Facility

Please see initial attorney request to you of September 11, 2018 and the attorney's responses to the questions you had (in red) in email string below. Please advise if further information is required.

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

EXECUTIVE SECRETARY

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

Sent: Tuesday, October 16, 2018 2:06 PM

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

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

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

Subject: RE: Raul Novoa v. The GEO Group, Inc., CV 17-2514 - Request for Inspection of GEO's Adelanto Facility

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

In addition to the information below, I want to flag that (b)(6);(b)(7)(C) are videographers. We understand that ICE may have parameters regarding video inside the facility. Let us know if you need anything further.

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From: (b)(6);(b)(7)(C) Assoc-DC-LT
Sent: Tuesday, October 16, 2018 4:48 PM
To: (b)(6);(b)(7)(C)
Cc: (b)(6);(b)(7)(C)
(b)(6);(b)(7)(C)
Subject: RE: Raul Novoa v. The GEO Group, Inc., CV 17-2514 - Request for Inspection of GEO's Adelanto Facility

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

We've finally received the information we need from Plaintiff regarding initiating the inspection request. Please see the answers below regarding the request. We have additional information that we think will be required after this initial step, including copies of their drivers' licenses, DOBs, and Social Security Numbers. Let us know if you need anything further at this time.

- Who is asking to inspect the facility (names)?

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

- Why are they requesting to inspect the facility (listing specific reason(s):

Plaintiff (b)(6);(b)(7)(C) has filed a class action lawsuit against GEO Group on behalf of him and others similarly situated. Pursuant to Rule 34 of the Federal Rules of Civil Procedure, attorneys are requesting an inspection of the Adelanto facility. Specifically, they would like to see representative samples of pod and dorm-style living areas, desegregation and administrative segregation areas, commissary areas, kitchens, law libraries, laundry facilities, barbering facilities, and medical centers.

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From: (b)(6);(b)(7)(C)
Sent: Wednesday, September 12, 2018 1:45 PM
To: (b)(6);(b)(7)(C)

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

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

Subject: RE: Raul Novoa v. The GEO Group, Inc., CV 17-2514 - Request for Inspection of GEO's Adelanto Facility

(b)(6);(b)(7)(C) thanks for your email.

We're working with plaintiff's counsel to obtain all visitors' information with regard to the first inquiry. We'll let you know when we have a comprehensive list of names.

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

Sent: Wednesday, September 12, 2018 2:01 PM

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

Cc:

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

Subject: Fw: Raul Novoa v. The GEO Group, Inc., CV 17-2514 - Request for Inspection of GEO's Adelanto Facility

It was a pleasure speaking with you this morning. As discussed, could you please provide the following information on the above listed case so that we can move forward on this request:

- Who is asking to inspect the facility (names)?
- Why are they requesting to inspect the facility (listing specific reason(s):

Plaintiff (b)(6);(b)(7)(C) has filed a class action lawsuit against GEO Group on behalf of him and others similarly situated. Pursuant to Rule 34 of the Federal Rules of Civil Procedure, attorneys are requesting an inspection of the Adelanto facility, specifically (1) areas used for disciplinary or corrective actions against detainees, including any facilities used for solitary confinement; (2) any area that was the subject of detainee work as a result of the Work Program.

We shall look forward to your response.

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

EXECUTIVE SECRETARY

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

Date: Tuesday, Sep 11, 2018, 8:42 AM

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

Cc:

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

Subject: Raul Novoa v. The GEO Group, Inc., CV 17-2514 - Request for Inspection of GEO's Adelanto Facility

AFOD Valdez,

I'm representing the GEO Group in the above referenced case. The plaintiff in the case has requested an inspection of the Adelanto facility. (b)(6);(b)(7)(C) at ICE headquarters in DC advised us to reach out to AFOD Jorge Field, but Warden (b)(6);(b)(7)(C) at Adelanto says that he usually processes inspection requests through you first. Can you assist us in processing this request and/or directing us to the right person to do so?

Let me know if you have any questions or concerns. I'm available by phone as well.

Best,

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

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