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September 29, 2018

VIA E-Mail and Certified Mail

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

General Counsel
Office of the General Counsel
United States Department of Homeland Security
Washington, DC 20258

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

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Associate Legal Advisor
Government Information Law Division, Office of the Principal Legal Advisor,
U.S. Immigration and Customs Enforcement
500 12th St. SW
5th Floor, Room (b)(6);(7)(C)
Washington, DC 20536

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

Re: *Novoa et al. v. The GEO Group, Inc.*, Civil Action No. 5:17-cv-02514

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

The GEO Group, Inc. (“GEO”), a U.S. Immigration and Customs Enforcement (“ICE”) contractor, is the defendant in the above-referenced matter, which is pending before the United States District Court for the Central District of California. The litigation concerns the ICE Detention Facility in Adelanto, California, which GEO manages and operates pursuant to a subcontract under an Intergovernmental Service Agreement between the U.S. Department of Homeland Security (“DHS”) and The City of Adelanto.

Plaintiffs in this litigation issued a Rule 30(b)(1) Notice of Deposition of (b)(6);(b)(7)(C) (b)(6);(b)(7)(C). The deposition is scheduled for October 22, 2018. Mr. (b)(6);(b)(7)(C) is the Senior Vice President, Business Development for GEO, and a former ICE official. Accordingly, I am submitting this written request to the DHS Office of the General Counsel pursuant to 6 C.F.R. 5.45 for Mr. Venturella to orally provide, if necessary, “official information” as defined by 6 C.F.R. 5.41(e) at the deposition. While Plaintiff’s attached Notice of Deposition does not identify the specific topics to be covered or details regarding the scope of the testimony sought, Mr. (b)(6);(b)(7)(C) may be requested to testify about his knowledge regarding operations at the Adelanto Detention Facility, GEO’s subcontract to manage and operate the facility, and relevant GEO and ICE policies. This knowledge is relevant to the litigation as

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September 29, 2018

Page 2

Plaintiffs allege that specific violations of law occurred at the Adelanto Detention Facility. Unfortunately, I cannot provide further specificity regarding the nature and relevance of the official information sought as Mr. (b)(6),(b)(7)(C) is being deposed as a fact witness.

There is precedent for ICE approval of GEO employees to provide testimony pertaining to “official information” in related litigation pending before the United States District Court for the District of Colorado. In 2016 (b)(6),(b)(7)(C) Assistant Chief Counsel, New York Office of the Chief Counsel, Office of the Principal Legal Advisor, ICE, approved the testimony of two GEO employees as there was “no reason to believe that compliance with the deposition would be unduly burdensome or inappropriate or adversely affect DHS’ mission.”

I am available via e-mail at (b)(6),(b)(7)(C) or by phone at 202.331.(b)(6),(b)(7)(C) to address any questions that may arise during the processing of this request, which is made pursuant to DHS’ regulations, 6 C.F.R. 5.41 *et seq.* I appreciate your assistance in the timely processing of this request.

Sincerely,

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

Counsel for The GEO Group, Inc.

Enclosures

30(b)(1) Notice of Deposition

February 11, 2016 Deposition Approval Letter from (b)(6),(b)(7)(C)