

**From:** (b)(6),(b)(7)(C)  
**Sent:** 20 Feb 2018 13:22:18 -0500  
**To:** (b)(6),(b)(7)(C)  
**Cc:** (b)(6),(b)(7)(C)  
**Subject:** GEO meeting prep - attachments  
**Attachments:** FW: Menocal Outline - Rehearing En Banc, RE: Menocal update

Just learned that the attachments I added to the calendar invite aren't working. Please see attached, which have their own attachments, including a (b)(6),(b)(7)(C) outline.

Thanks,

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

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

Chief  
District Court Litigation Division  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
U.S. Department of Homeland Security  
202-732- (b)(6),(b)(7)(C) (direct)  
202-732- (b)(6),(b)(7)(C) (main)  
202-386- (b)(6),(b)(7)(C) (cell)

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

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**From:** (b)(6),(b)(7)(C)  
**Sent:** 19 Feb 2018 14:45:58 +0000  
**To:** (b)(6),(b)(7)(C)  
**Cc:**  
**Subject:** FW: Menocal Outline - Rehearing En Banc  
**Attachments:** (draft) Menocal Rehearing Outline.docx

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

(b)(5)

Thanks very much.

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

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**From:** (b)(6),(b)(7)(C)  
**Sent:** Friday, February 16, 2018 4:36 PM  
(b)(6),(b)(7)(C)  
**Cc:** (b)(6),(b)(7)(C)  
**Subject:** Menocal Outline - Rehearing En Banc

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

Hope all is well. Thank you so much again for our conversation yesterday, Here is the outline of the en banc petition for the 10<sup>th</sup> circuit in Menocal. In an ideal world, DOJ (b)(5)

(b)(5)

Many thanks,

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

(b)(6),(b)(7)(C) | **Holland & Knight**

Partner

Holland & Knight LLP

800 17th Street N.W., Suite (b)(6),(b)(7)(C) | Washington DC 20006

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(b)(6),(b)(7)(C) | [www.hklaw.com](http://www.hklaw.com)

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**From:** (b)(6);(b)(7)(C)  
**Sent:** 20 Feb 2018 08:52:25 -0500  
**To:** (b)(6);(b)(7)(C)  
**Cc:**  
**Subject:** RE: Menocal update  
**Attachments:** RE: omnibus list of questions about Menocal, RE: Menocal/Owino Statements of Interest

(b)(5);(b)(6);(b)(7)(C)



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

(b)(6);(b)(7)(C) Associate Legal Advisor  
Office of the Principal Legal Advisor | DCLD  
202-732- (b)(6);(b)(7)(C) (desk) | 202-875- (b)(6);(b)(7)(C) (cell)



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**From:** (b)(6),(b)(7)(C)  
**Sent:** Saturday, February 17, 2018 2:32 PM  
**To:** (b)(6),(b)(7)(C)  
**Cc:**  
**Subject:** Menocal update

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

I talked with Fed Programs (b)(6),(b)(7)(C) on Thursday, and (b)(6),(b)(7)(C) and I talked with her, (b)(6),(b)(7)(C) and Civil Appellate's (b)(6),(b)(7)(C) on Friday. (b)(6),(b)(7)(C) and (b)(6),(b)(7)(C) spoke with GEO's general counsel (b)(6),(b)(7)(C) the corporate counsel and (b)(6),(b)(7)(C) late Thursday.

In the Thursday call (b)(6),(b)(7)(C) said told me (b)(5)

(b)(5)

(b)(5)

(b)(5)

We told them GEO has requested a meeting with Mr. Homan next Thursday, we're meeting on Tuesday to prepare for that meeting, and maybe we'll have the opportunity then to talk internally about (b)(5)

(b)(6) can follow-up with (b)(6),(b)(7)(C)

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

Deputy Chief, DCLD  
ICE/OPLA  
188 Harvest Lane  
Williston, VT 05495  
Ph. 802-872-6067

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**From:** (b)(6);(b)(7)(C)  
**Sent:** 6 Feb 2018 19:09:26 +0000  
**To:** (b)(6);(b)(7)(C)  
**Subject:** RE: omnibus list of questions about Menocal  
**Attachments:** FW: Recommendation on addressing discovery/Touhy issues in statement of interest, Otay Mesa contract excerpt.pdf, ODT-5-C-0003 P00059cca staffing pattern.pdf, PBNDS 2011 (with 2016 Updates).pdf

Thanks (b)(6);(b)(7)(C) and thanks for the call yesterday.

Here are some additional inputs; taking these in the order you've posed them:

(b)(5)



(b)(5)

Thanks,

(b)(6),(b)

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

| Associate Legal Advisor  
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and Customs  
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**From:** (b)(6),(b)(7)(C)  
**Sent:** Monday, February 05, 2018 2:07 PM  
**To:** (b)(6),(b)(7)(C)  
**Subject:** omnibus list of questions about Menocal

Hi (b)(6),(b)(7)

I hope your travel last week went smoothly. I used to live in Philadelphia so I'm feeling pretty good today.



I wanted to follow-up on the questions I've sent regarding (b)(5)

(b)(5)

(b)(5)

And two new questions:

(b)(5)

Regards,

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

Trial Attorney | United States Department of Justice  
Civil Division | Federal Programs Branch  
20 Massachusetts Ave. NW  
Washington, D.C. 20001 | (202) 514-(b)(6),(b)(7)(C)

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

**From:** (b)(6),(b)(7)(C)  
**Sent:** 24 Jan 2018 23:07:07 +0000  
**To:** (b)(6),(b)(7)(C)  
**Cc:**  
**Subject:** FW: Recommendation on addressing discovery/Touhy issues in statement of interest

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

Thanks for the review and for writing out the positions; these are helpful. Copying (b)(6),(b)(7)(C) as well for any clarifications she may wish to add with extensive background on *Menocal*.

(b)(5)



Thanks for your consideration,

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

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