



constructive denial of Plaintiffs' FOIA requests are improper and should not be countenanced. As a matter of law, ICE should be required to fulfill its statutory obligations and release the requested records immediately.

### **PARTIES**

4. Plaintiff Rapid Defense Network is a non-profit organization organized under the laws of New York with its principal place of business in New York. RDN is a legal services organization dedicated to providing pro bono legal assistance to non-citizens facing deportation or detention. RDN monitors developments in immigration law that affect the rights of noncitizens who are facing detention and deportation and partners with law firms and law school clinics to bring impact litigation and habeas corpus claims on behalf of noncitizens.

5. Plaintiff Transgender Law Center is a non-profit organization based in California with offices in California, Georgia, and New York. TLC is the largest national trans-led organization advocating for transgender and gender nonconforming people.

6. Defendant ICE is an agency of the federal government. It has possession, custody and/or control of the records that Plaintiffs seek.

### **JURISDICTION AND VENUE**

7. This Court has jurisdiction pursuant to 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. § 1331.

8. Venue is proper in this Court under 5 U.S.C. § 552(a)(4)(B) because of Plaintiff RDN's principal place of business in this district.

9. Defendant has failed to comply with FOIA's time limit provisions, and therefore Plaintiffs are deemed to have exhausted administrative remedies pursuant to 5 U.S.C. § 552(a)(6)(C).

## **BACKGROUND**

### **REQUEST A**

10. On April 19, 2021, Plaintiffs submitted a FOIA request to ICE ("Request A") seeking the following public records:

- Any records indicating the number of transgender and/or intersex detainees who have been held in solitary confinement (including, but not limited to, administrative or medical segregation) for any period of time or duration between January 1, 2015 through the present at any immigration detention facility, including records related to the length of time of such solitary confinement, and the stated basis for such confinement. These records include, but are not limited to, each report to a Field Office Director pursuant to 6 C.F.R. §§ 115.43(e) and/or 115.68(d) regarding the placement in administrative segregation of a transgender or intersex detainee victim of sexual abuse or assault;
- Any records that reflect or constitute policies, procedures, rules, internal policy guidance, training materials, or legal opinions or memoranda that concern, refer to, or provide guidance that include the phrases "solitary confinement," "administrative segregation," or "medical segregation" and the words "transgender" or "intersex;" and
- Any records that reflect or constitute policies, procedures, rules, internal policy guidance, training materials, or legal opinions or memoranda that concern, refer to, or provide guidance that include the phrase "protective custody" and the words "transgender" or "intersex."

A true and correct copy of Request A is attached hereto as Exhibit 1.

11. ICE has failed to respond to Request A. In an effort to avoid litigation, counsel for Plaintiffs on May 3, 2021, sent an email to a DHS FOIA officer, asking to discuss FOIA Request A. A true and correct copy of that email is attached hereto as Exhibit 2. To date, Plaintiffs' counsel has not received any response.

12. Plaintiffs therefore have exhausted their administrative remedies regarding Request A pursuant to 5 U.S.C. § 552(6)(C)(i).

### REQUEST B

13. Also on April 19, 2021, Plaintiffs submitted a FOIA request to ICE (“Request B”) seeking the following public records:

- Copies of each annual report completed on or after January 1, 2015 by the ICE Prevention of Sexual Assault Coordinator pursuant to 6 C.F.R. § 115.87(c);
- Copies of each annual report completed on or after January 1, 2015 pursuant to Section 5.11 of ICE Policy No. 11062.2: *Sexual Assault and Abuse Prevention and Intervention* (SAAPI Directive), May 22, 2014, which is available at <https://www.ice.gov/doclib/detention-reform/pdf/saapi2.pdf>;
- Copies of each annual report from each facility completed on or after January 1, 2015 and provided to the ICE PSA Coordinator pursuant to 6 C.F.R. § 115.86(c);
- Copies of the documentation of each grievance related to sexual abuse or assault provided to any ICE Field Office Director since January 1, 2015, pursuant to 6 C.F.R. § 115.52(e);
- Copies of all records, including memoranda and communications, created on or after January 1, 2015 that contain the words “transgender” or “intersex” and the term “PREA” or “Prison Rape Elimination Act;” and
- All records identifying ICE employees, contractors, subcontractors, and other detention facility staff who have been criminally charged for offenses in which the alleged victim(s) were detainees since January 1, 2015.

A true and correct copy of Request B is attached hereto as Exhibit 3.

14. ICE has failed to respond to Request B.

15. In an effort to avoid litigation, counsel for Plaintiffs on May 3, 2021, sent an email to a DHS FOIA officer, asking to discuss FOIA Request B. A true and correct copy of

that email is attached hereto as Exhibit 4. To date, Plaintiffs' counsel has not received any response.

16. Plaintiffs therefore have exhausted their administrative remedies regarding Request B pursuant to 5 U.S.C. § 552(6)(C)(i).

### **COUNT I**

17. Plaintiffs repeat, reallege and incorporate the allegations in the foregoing paragraphs as though fully set forth herein.

18. ICE is an agency subject to FOIA and must disclose in response to a proper request for records all responsive records within its control and provide a lawful reason for withholding any portion of the records requested.

19. ICE has failed to provide records responsive to Requests A and B within the time limits required by FOIA. Accordingly, Plaintiffs are deemed to have exhausted their administrative remedies.

20. ICE has violated FOIA by failing to issue a determination and to release the records within the time limits required by law.

17. ICE has no lawful basis for failing to disclose the records sought by Requests A and B.

18. Accordingly, Plaintiffs are entitled to an order enjoining Defendant from withholding agency records and compelling the production of records sought by Requests A and B.

### **REQUEST FOR RELIEF**

WHEREFORE, Plaintiffs respectfully request that this Court:

- a. Declare that the records sought by Request A and B are public and must be disclosed;
- b. Enjoin ICE from withholding the records sought by Requests A and B;
- c. Order ICE to provide the records sought by the Requests A and B to Plaintiffs within 10 business days of the Court's order;

- d. Award Plaintiffs the costs of this proceeding, including reasonable attorney's fees, pursuant to 5 U.S.C. § 552(a)(4)(E); and
- e. Grant Plaintiffs such other and further relief as this Court deems just and proper.

Dated: August 12, 2021

Respectfully submitted,

BALLARD SPAHR LLP

/s/ Jacquelyn N. Schell

Jacquelyn N. Schell  
BALLARD SPAHR LLP  
1675 Broadway, 19th Floor  
New York, NY 10019  
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Matthew E. Kelley (application for admission *pro hac vice* forthcoming)

BALLARD SPAHR LLP  
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*Counsel for Plaintiffs*

Sarah T. Gillman  
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11 Broadway, Suite 615  
New York, NY 10004-1490  
sarah@defensenetwork.org

*Counsel for Rapid Defense Network*

Lynly S. Egyes  
Transgender Law Center PO Box 70976  
Oakland, CA 94612  
Tel: 973-454-6325

*Counsel for Transgender Law Center*



# Exhibit 1





# Transgender Law Center



**RAPID DEFENSE  
NETWORK**

Lynly Egyes  
Transgender Law Center  
PO Box 70976  
Oakland, CA 94612  
Telephone: 510-587-9696  
Email: [lynly@transgenderlawcenter.org](mailto:lynly@transgenderlawcenter.org)

Sarah Gillman  
Rapid Defense Network  
11 Broadway, Suite 615  
New York, NY 10004  
Telephone: 212-843-0910  
Email: [sarah@defensenetwork.org](mailto:sarah@defensenetwork.org)

April 19, 2021

Freedom of Information Act Office  
United States Immigration & Customs Enforcement  
500 12th Street, SW, Stop 5009  
Washington, DC 20536  
Email: [ice-foia@dhs.gov](mailto:ice-foia@dhs.gov)

**Re: Freedom of Information Act Request**

To the FOIA Officer:

This is a request under the Freedom of Information Act, 5 U.S.C. § 552, submitted by the Transgender Law Center (“TLC”) and Rapid Defense Network (“RDN”). We respectfully request copies of the following records:

- Any records indicating the number of transgender and/or intersex detainees who have been held in solitary confinement (including, but not limited to, administrative or medical segregation or protective custody) for any period of time or duration between January 1, 2015 through the present at any immigration detention facility, including records related to the length of time of such solitary confinement, and the stated basis for such confinement. These records include, but are not limited to, each report to a Field Office Director pursuant to 6 C.F.R. §§ 115.43(e) and/or 115.68(d) regarding the placement in administrative segregation of a transgender or intersex detainee victim of sexual abuse or assault;



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- Any records that reflect or constitute policies, procedures, rules, internal policy guidance, training materials, or legal opinions or memoranda that concern, refer to, or provide guidance that include the phrases “solitary confinement,” “administrative segregation,” or “medical segregation” and the words “transgender” or “intersex;” and
- Any records that reflect or constitute policies, procedures, rules, internal policy guidance, training materials, or legal opinions or memoranda that concern, refer to, or provide guidance that include the phrase “protective custody” and the words “transgender” or “intersex.”

For hard-copy documents and documents stored electronically, we request that you produce them to us in .pdf format. For audio or video files, please produce them to us in .mp3 or .mp4 format.

Release of these records is in the public interest because these records will help inform the public regarding the treatment of people who identify as transgender in the custody of the Department of Homeland Security (“DHS”), Immigration and Customs Enforcement (“ICE”). These records are likely to contribute significantly to the public’s understanding of the conditions of detention for immigration detainees who identify as transgender and ICE’s operation and oversight of detention facilities that house transgender detainees. This information is not in the commercial interest of TLC and RDN, which are nonprofit organizations. Both TLC and RDN intend to make these records and/or reports using information from these records available to the general public via their websites, transgenderlawcenter.org and defensenetwork.org. Therefore, pursuant to 5 U.S.C. § 552(a)(4)(A)(iii), we are entitled to a fee waiver for this request. If you deny this request, however, and the fees will exceed \$250, please notify us of the charges before you fulfill our request so that we may decide whether to pay the fees or appeal your denial of our request for a waiver.

As you know, FOIA provides that if portions of a document are exempt from release, the remainder must be segregated and disclosed. Therefore, please send us all non-exempt portions of the records we have requested and justify any deletions by reference to specific exemptions of the FOIA. We reserve the right to appeal your decision to withhold any materials.

We are seeking information about the treatment of people who identify as transgender who are in the custody of ICE, a federal agency. We therefore request expedited processing for this request, which meets the Department of Homeland Security’s established criteria for processing requests on an expedited basis: a lack of expedited processing could reasonably be expected to pose an imminent threat to the life or physical safety of an individual. Internal and independent investigations have documented serious, ongoing and unaddressed problems at facilities housing transgender detainees, including inadequate medical care, punitive use of solitary confinement, and unsanitary and dangerous living conditions.<sup>1</sup> Two transgender migrants have died after

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<sup>1</sup> E.g., Dep’t of Homeland Security Office of Inspector General, *Violations of Detention Standards amid COVID-19 Outbreak at La Palma Correctional Center in Eloy, AZ*, (Mar. 30, 2021), <https://www.oig.dhs.gov/sites/default/files/assets/2021-04/OIG-21-30-Mar21.pdf> (documenting health hazards and mistreatment of detainees at facility where some transgender detainees had been held);



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suffering medical neglect in ICE custody in recent years.<sup>2</sup> TLC and RDN intend to use the records obtained via this FOIA request in their efforts to end the detention of transgender people in such dangerous and deadly conditions.

Please contact us via telephone or email, rather than by U.S. mail, in reference to this request. You may communicate with Lynly Egyes, Legal Director at Transgender Law Center, who can be reached at 510-587-9696 or [lynly@transgenderlawcenter.org](mailto:lynly@transgenderlawcenter.org), or Sarah Gillman, Legal Director at Rapid Defense Network, who can be reached at 212-843-0910 or [sarah@defensenetwork.org](mailto:sarah@defensenetwork.org).

We look forward to receiving your response within 20 working days, as required by law.

Sincerely,

A black rectangular box containing a handwritten signature in white ink, which appears to be "Lynly Egyes".

Lynly Egyes, Legal Director  
Transgender Law Center

A black rectangular box redacting the signature of Sarah Gillman.

Sarah Gillman, Legal Director  
Rapid Defense Network

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Physicians for Human Rights, *Praying for Hand Soap and Masks: Health and Human Rights Violations in U.S. Immigration Detention during the COVID-19 Pandemic*, (January 2021), <https://phr.org/wp-content/uploads/2021/01/PHR-Praying-for-Hand-Soap-and-Masks.pdf> (detainee at Otay Mesa Detention Center reported transgender detainee was placed in solitary confinement in retaliation for helping publicize unhealthy conditions).

<sup>2</sup> See Tim Fitzsimons, *Democratic lawmakers call on ICE to release transgender migrants*, NBC News (Jan. 16, 2020), <https://www.nbcnews.com/feature/nbc-out/democratic-lawmakers-call-ice-release-transgender-migrants-n1116621>.

# Exhibit 2

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**From:** Sarah Gillman <[sarah@defensenetwork.org](mailto:sarah@defensenetwork.org)>  
**Sent:** Monday, May 3, 2021 4:41 PM  
**To:** [ice-foia@dhs.gov](mailto:ice-foia@dhs.gov) <[ice-foia@dhs.gov](mailto:ice-foia@dhs.gov)>  
**Cc:** Lynly Egyes <[lynly@transgenderlawcenter.org](mailto:lynly@transgenderlawcenter.org)>  
**Subject:** Fw: Freedom of Information Act Request from Transgender Law Center (TLC) and Rapid Defense Network (RDN)

Dear FOIA Officer:

I am writing to follow-up on this request that was submitted on April 19, 2021.

Please contact us via telephone or email, rather than by U.S. mail, in reference to this request. You may communicate with Lynly Egyes, Legal Director at Transgender Law Center, who can be reached at 510-587-9696 or [lynly@transgenderlawcenter.org](mailto:lynly@transgenderlawcenter.org), or can reach me at 212-843-0910 or [sarah@defensenetwork.org](mailto:sarah@defensenetwork.org).

Thank you.

Sarah.

**Sarah T. Gillman**  
*Legal Director*  
Rapid Defense Network\*  
11 Broadway, Suite 615,  
New York, NY 10004  
Tel (212) 843-0910 · Fax  
(212) 257-7033  
[www.defensenetwork.org](http://www.defensenetwork.org)  
\*formerly NSC Community  
Legal Defense

---

**From:** Sarah Gillman  
**Sent:** Monday, April 19, 2021 1:36 PM  
**To:** [ice-foia@dhs.gov](mailto:ice-foia@dhs.gov) <[ice-foia@dhs.gov](mailto:ice-foia@dhs.gov)>  
**Cc:** [lynly@transgenderlawcenter.org](mailto:lynly@transgenderlawcenter.org) <[lynly@transgenderlawcenter.org](mailto:lynly@transgenderlawcenter.org)>  
**Subject:** Freedom of Information Act Request from Transgender Law Center (TLC) and Rapid Defense Network (RDN)

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who can be reached at 510-587-9696 or [lynly@transgenderlawcenter.org](mailto:lynly@transgenderlawcenter.org), or can reach me at 212-843-0910 or [sarah@defensenetwork.org](mailto:sarah@defensenetwork.org).

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Thank you.

Sarah Gillman

**Sarah T. Gillman**

*Legal Director*

Rapid Defense Network\*

11 Broadway, Suite 615,

New York, NY 10004

Tel (212) 843-0910 · Fax

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\*formerly NSC Community

Legal Defense

# **Exhibit 3**



**RAPID DEFENSE  
NETWORK**

Lynly Egyes  
Transgender Law Center  
PO Box 70976  
Oakland, CA 94612  
Telephone: 510-587-9696  
Email: lynly@transgenderlawcenter.org

Sarah Gillman  
Rapid Defense Network  
11 Broadway, Suite 615  
New York, NY 10004  
Telephone: 212-843-0910  
Email: sarah@defensenetwork.org

April 19, 2021

Freedom of Information Act Office  
United States Immigration & Customs Enforcement  
500 12th Street, SW, Stop 5009  
Washington, DC 20536  
Email: ice-foia@dhs.gov

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- Copies of each annual report from each facility completed on or after January 1, 2015 and provided to the ICE PSA Coordinator pursuant to 6 C.F.R. § 115.86(c);
- Copies of the documentation of each grievance related to sexual abuse or assault provided to any ICE Field Office Director since January 1, 2015, pursuant to 6 C.F.R. § 115.52(e);





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- Copies of all records, including memoranda and communications, created on or after January 1, 2015 that contain the words “transgender” or “intersex” and the term “PREA” or “Prison Rape Elimination Act;” and
- All records identifying ICE employees, contractors, subcontractors, and other detention facility staff who have been criminally charged for offenses in which the alleged victim(s) were detainees since January 1, 2015.

For hard-copy documents and documents stored electronically, we request that you produce them to us in .pdf format. For audio or video files, please produce them to us in .mp3 or .mp4 format.

Release of these records is in the public interest because these records will help inform the public regarding the treatment of people who identify as transgender in the custody of the Department of Homeland Security (“DHS”), Immigration and Customs Enforcement (“ICE”). These records are likely to contribute significantly to the public’s understanding of the conditions of detention for immigration detainees who identify as transgender and ICE’s operation and oversight of detention facilities that house transgender detainees. This information is not in the commercial interest of TLC and RDN, which are nonprofit organizations. Both TLC and RDN intend to make these records and/or reports using information from these records available to the general public via their websites, transgenderlawcenter.org and defensenetwork.org. Therefore, pursuant to 5 U.S.C. § 552(a)(4)(A)(iii), we are entitled to a fee waiver for this request. If you deny this request, however, and the fees will exceed \$250, please notify us of the charges before you fulfill our request so that we may decide whether to pay the fees or appeal your denial of our request for a waiver.

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# Transgender Law Center



**RAPID DEFENSE  
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Transgender Law Center

Sarah Gillman, Legal Director  
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content/uploads/2021/01/PHR-Praying-for-Hand-Soap-and-Masks.pdf (detainee at Otay Mesa Detention Center reported transgender detainee was placed in solitary confinement in retaliation for helping publicize unhealthy conditions).

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# **Exhibit 4**

---

**From:** Sarah Gillman <[sarah@defensenetwork.org](mailto:sarah@defensenetwork.org)>  
**Sent:** Monday, May 3, 2021 4:40 PM  
**To:** [ice-foia@dhs.gov](mailto:ice-foia@dhs.gov) <[ice-foia@dhs.gov](mailto:ice-foia@dhs.gov)>  
**Cc:** Lynly Egyes <[lynly@transgenderlawcenter.org](mailto:lynly@transgenderlawcenter.org)>  
**Subject:** Fw: Freedom of Information Act Request from Transgender Law Center (TLC) and Rapid Defense Network (RDN)

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Legal Defense

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**From:** Sarah Gillman  
**Sent:** Monday, April 19, 2021 1:44 PM  
**To:** [ice-foia@dhs.gov](mailto:ice-foia@dhs.gov) <[ice-foia@dhs.gov](mailto:ice-foia@dhs.gov)>  
**Cc:** [lynly@transgenderlawcenter.org](mailto:lynly@transgenderlawcenter.org) <[lynly@transgenderlawcenter.org](mailto:lynly@transgenderlawcenter.org)>  
**Subject:** Freedom of Information Act Request from Transgender Law Center (TLC) and Rapid Defense Network (RDN)

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Sarah Gillman

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