



October 5, 2023

**Via Mail and E-Mail**

U.S. Immigration and Customs Enforcement  
Freedom of Information Act Office  
500 12th Street, S.W., Stop 5009  
Washington, DC 20536  
[ICE-FOIA@dhs.gov](mailto:ICE-FOIA@dhs.gov)

**RE: FREEDOM OF INFORMATION ACT REQUEST – LANGUAGE ACCESS**

Dear Freedom of Information Officers:

Robert F. Kennedy Human Rights (“RFK Human Rights”), American Civil Liberties Union of Louisiana (“ACLU-LA”), and New York Civil Liberties Union (“NYCLU”) (collectively, “Requesters” or “we”), pursuant to the provisions of the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552 *et seq.*, as amended, and applicable agency regulations, request copies of the records identified in the numbered paragraphs below from the United States Immigration and Customs Enforcement (“ICE” or “the Agency”).<sup>1</sup>

We are also requesting expedited processing for this request, pursuant to 5 U.S.C. § 552(a)(6)(E) and agency regulations, and a fee waiver, pursuant to 5 U.S.C. § 552(a)(4)(A)(iii). In accordance with 5 U.S.C. § 552(a)(6)(A)(i), we expect a response to this request within 20 working days, unless otherwise permitted by statute.

**Purpose of the Request for Information**

The New Orleans Immigration and Customs Enforcement Field Office (the “NOLA ICE Field Office”) area of responsibility (“NOLA ICE AOR”) includes Louisiana, Mississippi, Alabama, Arkansas, and Tennessee. As of September 18, 2023, active detention facilities within the

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<sup>1</sup> We ask that you please direct this request to all appropriate offices and components within ICE including, but not limited to: Adams County Correctional Center (“Adams County”); Winn Correctional Center (“Winn”); Central Louisiana Immigrant Processing Center (“Jena LaSalle”); Jackson Parish Correctional Center (“Jackson Parish”); South Louisiana Immigrant Processing Center (“Basile”); Richwood Correctional Center (“Richwood”); Pine Prairie Immigrant Processing Center (“Pine Prairie”); River Correctional Center (“River”); Allen Parish Public Safety Complex (“Allen Parish”); Alexandria Staging Facility; New Orleans Field Office Enforcement and Removal Operations; Office of Detention Policy and Planning; Detention Standards Compliance Unit, Detention Management Division; Segregation Review Coordinator; Detention Service Managers (“DSM”); Custody Management Division (“CMD”); ICE Health Service Corps (“IHSC”); Facility Administrators that report to the New Orleans Field Office; and the Detention Monitoring Council (“DMC”).

NOLA ICE AOR detain an average of 5,401 people.<sup>2</sup> The documented human rights and civil rights abuses within the ICE detention facilities under the purview of the NOLA ICE Field Office have generated public interest and concern in recent years. Although reports of human rights abuses and violations are common in ICE detention,<sup>3</sup> the culture of abuse and rampant legal impunity within the NOLA ICE AOR have set it apart.<sup>4</sup> Through years of advocacy on behalf of clients and other detained people, Requesters and others have documented systemic abuses within all 10 active facilities under the NOLA ICE Field Office, including reports of torture, physical abuse, threats of violence, anti-Black racism, threatened and deployed solitary confinement, deprivation of basic human necessities including life-saving medical care, and retaliation in response to reported grievances. The facilities' egregious conditions of confinement and unsafe release practices have led to serious injury and even death.

Due to the lack of transparency in ICE's operations, even advocates and attorneys who work closely with detained individuals describe ICE's practices in the NOLA ICE AOR as a "black box."<sup>5</sup> This FOIA request is necessary to bring transparency to the Agency's activities in the NOLA ICE AOR that are otherwise nearly entirely hidden from public view.

Requesters regularly witness and hear from individuals detained in the NOLA ICE Field Office facilities about ICE's violations of its statutory obligations, its contractual obligations,<sup>6</sup> its

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<sup>2</sup> See Transactional Records Access Clearinghouse, Detention Facilities Average Daily Population, <https://trac.syr.edu/immigration/detentionstats/facilities.html>.

<sup>3</sup> See, e.g., Chris Rickerd & Cristina Velez, National Immigration Project, *Complaints Ignored, Abuses Excused: Why the Department of Homeland Security's Internal Accountability Mechanisms Must Be Reformed* (Sirine Shebaya ed., Apr. 21, 2021), [https://nipnl.org/sites/default/files/2023-03/2021\\_27Apr\\_ice-report.pdf](https://nipnl.org/sites/default/files/2023-03/2021_27Apr_ice-report.pdf); Eunice Hyunhye Cho, ACLU National Prison Project & Joanna Naples-Mitchell, Physicians for Human Rights, *Behind Closed Doors: Abuse and Retaliation Against Hunger Strikers in U.S. Immigration Detention* (2021), [https://www.aclu.org/sites/default/files/field\\_document/aclu\\_phr\\_behind\\_closed\\_doors\\_final\\_1.pdf](https://www.aclu.org/sites/default/files/field_document/aclu_phr_behind_closed_doors_final_1.pdf).

<sup>4</sup> See, e.g., Letter to The Honorable Alejandro Mayorkas, Secretary, United States Department of Homeland Security, *Unchecked Human Rights and Civil Rights Abuses Systemic within the New Orleans ICE Field Office Area of Responsibility* (Dec. 20, 2021), <https://static1.squarespace.com/static/5a33042eb078691c386e7bce/t/61c0b47c15319f67d4045ca3/1640019069450/12%3A20%3A21+DHS+NOLA+ICE+Investigation+Follow-Up+Letter+%282%29.pdf>.

<sup>5</sup> In August 2021, following over 200 allegations since 2021 by advocates and attorneys, the Department of Homeland Security ("DHS") Office of Civil Rights and Civil Liberties ("CRCL") launched an unprecedented investigation into the entire NOLA ICE AOR. To date, CRCL has not released the findings of this investigation. See Letter from DHS CRCL to Tae D. Johnson and Kerry E. Doyle, *ICE's Oversight of the New Orleans Field Office, Complaint Nos. 001278-21-ICE, 000993-21-ICE, 002483-21-ICE, 002240-21-ICE, 000101-21-ICE, 000102-21-ICE, 000890-21-ICE, 001523-21-ICE, 002407-21-ICE, 000377-21-ICE, and 000667-21-ICE* (Dec. 7, 2021), [https://www.dhs.gov/sites/default/files/2022-08/2021.12.07%20CRCL%20Retention%20Memo%20to%20ICE%20-%20Oversight%20of%20New%20Orleans%20AOR%20-%20Redacted\\_508.pdf](https://www.dhs.gov/sites/default/files/2022-08/2021.12.07%20CRCL%20Retention%20Memo%20to%20ICE%20-%20Oversight%20of%20New%20Orleans%20AOR%20-%20Redacted_508.pdf).

<sup>6</sup> See ICE FOIA Library, Detention Facility Contracts - H.R. 116-458 P. 38, <https://www.ice.gov/foia/library> (providing that service providers "shall provide language access services, which include interpretation and translation services, for limited English proficient (LEP) detainees").

constitutional obligations, its obligations under international human rights and refugee law, and its obligations under its own standards to “improve safety, security and conditions of confinement for detainees” (“Performance-Based National Detention Standards” or “PBNDS”).<sup>7</sup> These violations include *inadequate language access services*, including a pattern and practice of denying Limited English Proficiency (“LEP”) individuals access to legal and other resources in their best language, severely limiting their ability to participate in the legal process. In addition, reports indicate that individuals who are unable to read or write in any language are also blocked from accessing the accommodations needed to meaningfully participate in their legal defense.

The NOLA ICE Field Office has allowed language access issues to remain unchecked in its facilities. Requesters have documented instances of inadequate access to language services that have resulted in the denial of medical care, the denial of access to the due process and the legal system, and denial of meaningful access to other services in the facility, despite the fact that such access is mandated by federal law. For example, LEP individuals at several facilities, including the South Louisiana ICE Processing Center in Basile, Louisiana and the Richwood Correctional Center in Monroe, Louisiana, reported that when they sought medical attention at the facility, the phone interpreters that they were provided did not adequately translate their communications to facility medical staff. This resulted in individuals’ inability to express their symptoms and receive a diagnosis or treatment from facility medical staff. Many individuals have also reported an inability to communicate with facility staff due to language barriers, leading to escalations in disciplinary action by facility officials and instances of verbal and physical abuse against detained LEP individuals.

Multiple individuals have also reported to Requesters that the facilities where they are detained do not have materials available in the law library in their best language. For example, one Turkish speaking individual detained at River Correctional Center in Ferriday, Louisiana reported that he was unable to complete an I-589 Application for Asylum, as instructed by the Immigration Judge, because the facility did not have a copy of the form in Turkish or any translation services providing him with the ability to read or complete the I-589 form. In addition, ICE is funneling thousands of asylum seekers through several facilities under the jurisdiction of NOLA ICE for their credible fear interviews (“CFI”) and reasonable fear interviews (“RFI”), including Adams County Correctional Center in Natchez, Mississippi. Multiple clients have reported ICE’s failure to provide appropriate interpretation and failure to issue rare language NTAs in accordance with controlling USCIS guidance.<sup>8</sup> For example, at Winn Correctional Center, at least two of SPLC’s clients, Bissa speaking asylum seekers from Burkina Faso, were forced to proceed with their CFIs in French, despite the fact that they indicated that they are not fluent in French and required a Bissa interpreter. As a result, SPLC

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<sup>7</sup> *ICE Detention Standards*, Immigration and Customs Enforcement (Nov. 9, 2021), <https://www.ice.gov/factsheets/facilities-pbnds>.

<sup>8</sup> USCIS Memorandum, *Processing Credible Fear Cases when a Rare Language Interpreter is Unavailable* (June 14, 2013), <https://www.uscis.gov/sites/default/files/document/memos/Processing-CF-RareLanguageInterpreter-Unavailable.pdf>.

discovered a plethora of errors with the CFIs that were only able to be clarified by SPLC using Bissa interpreters. Many of these errors went to the heart of the clients' asylum claims.

Requesters include national and local immigrant rights advocates and organizations that provide legal representation to individuals detained at the NOLA ICE Field Office facilities. Requesters work closely with people detained at these facilities and advocate alongside them. Knowledge of the conditions in which they are held are relevant for Requesters' representation of people detained at the NOLA ICE Field Office facilities and for Requesters' advocacy efforts to ensure the rights of people detained at these facilities are respected. Requesters have a vested interest in the conditions in which their clients and community members are held.

Requesters urgently seek information on the federal government's policies, directives, and actions relating to language access for immigrants at the NOLA ICE facilities. The disclosure of the information sought below will contribute to "public understanding of the operations or activities of the government," 5 U.S.C. § 552(a)(4)(A)(iii), and provide the public with information necessary to engage in the democratic process and public debate regarding the use of ICE detention in the NOLA region. Disclosure would thus be "in the public interest." 28 C.F.R. § 16.10(k); *see also* 6 C.F.R. § 5.11(k)(1).

### Definitions

The records request below incorporates the following definitions:

"Communication" refers to the transmittal of information in any format, including, but not limited to, the communication formats listed under "Record."

"Contract" or "Government Contract" refers to any agreement or modification thereof between any contracting agency and any person or entity for the purchase, sale, or use of personal property or nonpersonal services.

"Contractor" refers to any person or entity holding, or who has ever held or sought to hold, a Government Contract as defined in 41 CFR § 60-1.3. Any reference herein to a specific contractor or a contractor in general also refers to any division, subsidiary, or affiliate thereof and to their employees.

"Custody" refers to the state of being under the control of ICE or a third party at the direction of ICE based on purported violation of the Immigration and Nationality Act.

"Detain" or "Detention" refers to the act of ICE, whether by Agency personnel or a third party at the direction of ICE or Agency personnel, taking an individual into the custody of the United States government based on purported violations of the Immigration and Nationality Act, including but not limited to placement in a local or state jail or prison, including through Intergovernmental Service Agreement facilities, 287(g) agreements, private facilities, and federal facilities.

“Facility” or “ICE Facility” refers to any physical location where individuals are held pursuant to ICE Custody.

“New Orleans Field Office” refers to the geographical area that ICE considers within the “area of responsibility” or jurisdiction of the ICE New Orleans Field Office. ICE detention facilities including Adams County, Winn, Jena LaSalle, Jackson Parish, Basile, Richwood, Pine Prairie, River, Allen Parish, and the Alexandria Staging Facility are located within the New Orleans Field Office.

“Grievance” refers to any formal or informal complaint made by or on behalf of a detained person, or regarding the behavior of ICE personnel or conditions at a NOLA ICE facility, whether submitted to a NOLA ICE facility personnel or other government or nongovernment actors. For each grievance record requested, we also request records regarding any Agency investigation of, and response to, the grievance.

“Personnel” refers to an individual employed by an organization or authorized to act on behalf of an organization, including employees, contractors, contractors’ employees, agents, or representatives.

“Record” refers to any information in electronic, written, and/or printed form that is in ICE’s constructive possession, directly or indirectly, regardless of where or how the information originated or where or how ICE received it, encompassing but not limited to any information in the custody of any U.S. government contractors for purposes of information management for ICE, and including but not limited to: messaging communications between phones or other electronic devices, including but not limited to communications sent via short message service (“SMS”), multimedia message service (“MMS”), or any other messaging service, via Blackberry Messenger, iMessage, WhatsApp, Facebook, Signal, G-Chat, Instagram direct message, Twitter direct message, Slack, and/or any other messaging and communications platform; emails, letters, faxes, and/or any other form of correspondence; minutes and/or notes of meetings and/or phone calls; voicemail messages; images, video, and/or audio data; social media posts; calendar entries; files and their contents, including any notes; logs, spreadsheets, worksheets, and/or coversheets; database entries, analyses of data; metadata; investigations, reports, studies, and/or reviews; internal memoranda; contracts, agreements, and/or memoranda of understanding, including but not limited to intergovernmental services agreements; presentations, formal or informal; training criteria, standards, evaluations, and/or materials; orders, directives, and/or instructions; legal opinions and/or memoranda; policies, procedures, protocols, and/or manuals; guidance and/or guidelines; bulletins, advisories, and/or alerts; as well as any reproductions thereof that differ in any way from any other reproduction, such as copies containing notations, drafts, and revisions.

In requesting “policies” and “guidance,” the Requesters seek national policies and guidance, as well as policies and guidance specific to a facility or the New Orleans Field Office, in any format, including memoranda. However, Requesters do not refer to or seek copies of the Performance-Based National Detention Standards, unless annotated or incorporated in another record.

In requesting “correspondence” and “Communications,” the Requesters seek any record of written correspondence or verbal correspondence, whether formal or informal, in any format, including intra-Agency, inter-Agency correspondence, and Agency correspondence with third parties. The date range for all searches should be understood to commence with each provided start date and to end on the date the search for documents responsive to that request is commenced by the Agency. *See Ferguson v. U.S. Dep’t of Educ.*, 2011 WL 4089880, at \*11 (S.D.N.Y. Sept. 13, 2011) (commencement date of agency’s search was reasonable cut-off date).

### Request for Information

#### **Language Access and Accommodation**

1. Records reflecting policies or protocols in force on or after January 1, 2021 concerning how NOLA ICE facilities determine whether an individual is LEP.
2. Records sufficient to show the number of detained people designated as LEP and accommodations provided to them from January 1, 2021 to present, disaggregated by national origin and race of the Detained individual or, if not available, in aggregate.
3. Records reflecting policies or protocols in force on or after January 1, 2021 to ensure that each LEP individual has access to all of the accommodations to which they are entitled pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq. and Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency*, (August 11, 2000).
4. Records reflecting policies, protocols, or other safeguards in force on or after January 1, 2021 to ensure individuals who do not have sufficient literacy to adequately comprehend written information are meaningfully receiving the information that is provided to them in writing, including identifying such people and obtaining informed consent for documents requiring signatures.
5. Records reflecting policies, protocols, or other safeguards in force on or after January 1, 2021 concerning rare language CFIs conducted at NOLA ICE facilities.
6. Records since January 1, 2021 sufficient to show languages other than English determined to be spoken by “significant segments of the population,” per PBNDS § 2.13(II)(6), and efforts to provide written materials in those languages within the facility.
7. Records since January 1, 2021 sufficient to show (i) requests for interpretation made by detained people, or by ICE personnel to communicate with a detained person, (ii) the non-English language needed, (iii) the date of the request, (iv) the date of the disposition of the request, and (v) the outcome of the request.
8. Records since January 1, 2021 regarding the use of non-medical ICE personnel or detained people as interpreters for detained individuals during medical visits.

9. Records since January 1, 2021 regarding any Grievances submitted by or on behalf of a detained person regarding the provision of language access services, including translation and interpretation, and the resolution of such Grievances.
10. Records since January 1, 2021 regarding any Grievances submitted by or on behalf of a detained person related to alleged misrepresentation by ICE of documents presented by ICE to the detained person for their signature, and the resolution of any such Grievances.

### Format of Production

The Requesters request that responsive documents and materials be produced *in their entirety*, including all attachments, enclosures, hyperlinks and internal links, and exhibits. If it is determined that a document contains material or information that falls within a statutory exemption to mandatory disclosure under FOIA, the Requesters ask that such material or information be reviewed for possible discretionary disclosure, consistent with the presumption of openness codified in the Freedom of Information Act Improvement Act of 2016, Pub. L. 114-185, 130 Stat. 538.

Please search for responsive records regardless of format, medium, or physical characteristics, and including electronic records. Please provide the requested documents as follows:

- Data records in native format when possible (e.g., Excel spreadsheets in Excel);
- Other records in PDF format when possible;
- Electronically searchable when possible;
- Email attachments provided in sequential order following the email, to preserve the “parent-child” relationship, such that Requesters are able to identify which documents were the attachments to which emails;
- Email parents include BCC and any other hidden fields; and
- Other metadata preserved for all records.

Please furnish all applicable Records in electronic format as specified above via email to: Sarah Decker at [decker@rfkhumanrights.org](mailto:decker@rfkhumanrights.org) and Sarah Gillman at [gillman@rfkhumanrights.org](mailto:gillman@rfkhumanrights.org).

### Expedited Processing

We request expedited treatment for this FOIA request. This request qualifies for expedited treatment pursuant to 5 U.S.C. § 552(a)(6)(E) and applicable regulations. As demonstrated above, there is a “compelling need” for expedited processing sought by the Requesters. 5 U.S.C. § 552(a)(6)(E)(i)(I). The lack of expedited disclosure of records could “reasonably be expected to pose an imminent threat to the life or physical safety of an individual.” 5 U.S.C. § 552(a)(6)(E)(v)(I); 6 C.F.R. § 5.5(d)(1)(i). Moreover, there exists a clear “urgency to inform the public concerning actual or alleged Federal Government activity.” 5 U.S.C. § 552(a)(6)(E)(v)(II); *see also* 6 C.F.R. § 5.5(e)(1)(ii) (expedited processing is warranted where there is “[a]n urgency to inform the public about an actual or alleged federal government activity”). The Requesters are therefore entitled to expedited processing of this request.

### Fee Waiver Request

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii), the Requesters apply for a fee waiver. FOIA and applicable agency regulations require fees to be waived when it is determined, based upon the submission of the requester, that the information is “likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester.” 5 U.S.C. § 552(a)(4)(A)(iii); *see also* 5 C.F.R. § 5.11(k)(1) (permitting fee waiver when “disclosure of the requested information is in the public interest” and “is not primarily in the commercial interest of the requester”); 28 C.F.R. § 16.10(k) (“Requesters may seek a waiver of fees by . . . demonstrating how disclosure of the requested information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester.”).

Requesters are non-profit organizations that advocate alongside individuals detained at facilities in the New Orleans ICE Field Office. Access to this information is crucial for the Requesters and the communities they serve to evaluate immigration enforcement actions in their communities, including the conditions of confinement and protocols for detention, confinement and release, and their potential detrimental effects in their communities.

#### *RFK HR*

RFK HR is a non-partisan, not-for-profit organization that advocates for human rights issues and pursues strategic litigation to hold governments accountable for human rights abuses, including by pursuing immigrants’ rights and anti-detention advocacy and litigation. RFK HR is committed to transparency, government accountability, and education. Obtaining information about government activity, analyzing that information, and widely publishing and disseminating it to the press and the public is a critical and substantial component of RFK HR’s work. RFK HR regularly publishes in-depth analysis of current events affecting human rights and disseminates information to expose injustice. RFK HR disseminates content through its website—<https://rfkhumanrights.org/>—and by publishing reports, issuing press releases, and making public statements that reach thousands.

#### *ACLU-LA*

ACLU-LA is a not-for-profit organization that works to advance and preserve the individual rights and liberties guaranteed by the Constitution and laws of the United States and the State of Louisiana in matters that affect civil liberties and human rights, including the rights of prisoners and immigrants. ACLU-LA is committed to principles of transparency and accountability in government and seeks to ensure that the American public is informed about the conduct of its government in matters that affect civil liberties and human rights. Obtaining information about government activity, analyzing that information, and widely publishing and disseminating it to the press and the public is a critical and substantial component of the ACLU-LU’s work. ACLU-LA regularly issues press releases to call attention to documents obtained through FOIA requests, as well as other civil liberties-related current events. ACLU-LA also publishes “know your rights” materials designed to educate the public about immigrants’ rights. ACLU-LU



disseminates content through its website—<https://www.laaclu.org/>—and quarterly newsletters received by thousands of subscribers.

### NYCLU

NYCLU is the New York State affiliate of the ACLU. NYCLU is a not-for-profit organization that is committed to ensuring that the U.S. government complies with the Constitution and laws of this country in matters that affect civil liberties and human rights. NYCLU is committed to principles of transparency and accountability, and seeks to ensure that the public is informed about the conduct of the U.S. government in matters that affect civil liberties and human rights. Obtaining information about governmental activity, analyzing that information, and widely publishing and disseminating it to the press and the public is a critical and substantial component of NYCLU's work. To inform the public about government conduct affecting legal rights, NYCLU publishes newsletters, press releases, and know-your-rights handbooks. NYCLU publications are publicly available for no cost or for a nominal fee. NYCLU also disseminates information through its website—[www.nyclu.org](http://www.nyclu.org)—and through an electronic newsletter, which is received by thousands of subscribers.

The Requesters will make any information that they receive from these requests available to the public, including the press, at no cost. As detailed above, the conditions of immigrants detained in the NOLA ICE AOR is of significant public interest. The Requesters have undertaken this work in the public interest and not for any private commercial interest. Access to this information is necessary for the public to meaningfully evaluate the consequences of federal immigration policies and the operations of immigration detention facilities in their communities to which the public has no other way of gaining visibility. The Government must waive or, at minimum, reduce any fees because the Requesters have no commercial interest in the requested information. They request this information to educate the public regarding the Government's operations and activities. *See* 5 U.S.C. § 552(a)(4)(A)(iii).

If a fee waiver is not granted, Requesters in the alternative ask for a limitation of processing fees pursuant to 5 U.S.C. § 552(a)(4)(A)(ii)(II) (“[F]ees shall be limited to reasonable standard charges for document duplication when records are not sought for commercial use and the request is made by . . . a representative of the news media.”). *See also* 6 C.F.R. § 5.11(d)(1) (“No search fees will be charged for requests by . . . representatives of the news media, unless the records are sought for a commercial use.”).

### Conclusion

Thank you for your consideration of this request. There is an urgent need to inform the public of the policies and practices with respect to detained individuals' access to, and the adequacy of, language access services, in immigration detention centers in the NOLA ICE AOR region, where egregious treatment of immigrants in ICE custody has resulted and will continue to result in constitutional rights violations, public health risks, and even death. This information will assist advocates defending the rights of detained people in the NOLA ICE facilities.

If this request is denied in whole or part, the Requesters ask that ICE justify all deletions or redactions by reference to specific exemptions of FOIA. The Requesters expect ICE to release all segregable portions of otherwise exempt material, and reserve the right to appeal a decision to withhold any records or to deny Requesters' application for waiver of fees.

We look forward to your reply to the request for expedited processing within 10 business days, as required under 5 U.S.C. § 552(a)(6)(E)(ii)(I). Notwithstanding your decision on the matter of expedited processing, we look forward to your reply to the records request within 20 business days, as required under 5 U.S.C. § 552(a)(6)(A)(I). In the event the Government is unable to meet that deadline, the Requesters are willing to discuss an appropriate schedule for rolling productions.

If you have any questions regarding the processing of this request, please contact Sarah Decker at 908-967-3245 or [decker@rfkhumanrights.org](mailto:decker@rfkhumanrights.org), or Sarah Gillman at 646-289-5593 or [gillman@rfkhumanrights.org](mailto:gillman@rfkhumanrights.org).

#### Certification

The Requesters certify that the above information is true and correct to the best of the Requesters' knowledge. *See* 6 C.F.R. § 5.5(e)(3).

Sincerely,



Sarah Decker, Esq.  
Sarah Gillman, Esq.  
Robert F. Kennedy Human Rights

Nora Ahmed, Esq.  
ACLU of Louisiana

Amy Belsher, Esq.  
New York Civil Liberties Union