

Exhibit D

Exhibit D - Exemption 5 Attorney Client Challenges

#	Bates Number	Date(s)	Vaughn Document Description	Vaughn Description of Withheld Information
1	ICE FOIA 10-2674.0003386 - ICE FOIA 10-2674.0003389	9/30/2010	Emails among OCR, ICE senior leadership, ICE Office of the Assistant Secretary's Counsel, and SC PMO staff addressing a response to Representative Anna Eshoo's concerns re San Mateo County, California	Proposed language for response to Representative Eshoo on a jurisdiction's options if it does not wish to participate in SC. The language did not reflect any final agency policy or position. Draft language also contained edits by an attorney which reflected client-supplied information.
2	ICE FOIA 10-2674.0003472 - ICE FOIA 10-2674.0003475	9/29/2010	String of email communications/discussion between SC PMO staff elements and other DHS operational components	Coordination of issues and comments by agency staff components that contain predecisional discussions and include legal advice between attorney and client. The comments do not reflect any final agency policy or decision.
3	ICE FOIA 10-2674.0003476 - ICE FOIA 10-2674.0003480	9/29/2010	String of email communications/discussion between SC PMO staff elements and other DHS operational components	Coordination of issues and comments by agency staff components that contain predecisional discussions and include legal advice between attorney and client. The comments do not reflect any final agency policy or decision.
4	ICE FOIA 10-2674.0003487 - ICE FOIA 10-2674.0003495	9/30/2010	Email forwards memo from Legal Advisor to SC PMO	Provides legal points and authorities for client regarding SC program issues and concerns.
5	ICE FOIA 10-2674.0003496 - ICE FOIA 10-2674.0003498	10/13/2010	Email string between SC PMO staff and legal office preparing Draft response to media inquiry	Coordination of issues and comments by agency staff components that contain predecisional discussions and include legal advice between attorney and client. The comments do not reflect any final agency policy or decision.
6	ICE FOIA 10-2674.0003499 - ICE FOIA 10-2674.0003507	9/7/2010	String of email communications/discussion between SC PMO staff elements and DHS legal staff elements	Coordination of issues and comments by agency staff components that contain predecisional discussions and include legal advice between attorney and client. The comments do not reflect any final agency policy or decision.

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7	ICE FOIA 10-2674.0003569 - ICE FOIA 10-2674.0003581	9/17/2010	Email from OPLA to SC, which includes language from a Draft letter to a state government	Email from OPLA attorneys to SC containing legal advice, comments and edits to excerpts of a draft letter. The deliberations were regarding a letter being prepared by SC in response to a state's inquiry about the policies and procedures of SC. Comments did not reflect any final agency policy or position.
8	ICE FOIA 10-2674.0003582 - ICE FOIA 102674.0003583	undated	Draft letter in response to Congressional inquiry	Draft response letter to Congressional inquiry including OPLA legal advice, comments and edits. Comments did not reflect any final agency policy or position.
9	ICE FOIA 10-2674.0003584 - ICE FOIA 10-2674.0003589	9/7/2010	Draft of a legal memorandum prepared by OPLA	Draft internal memorandum containing deliberations and legal advice about the policies and procedures for SC, including options for states that wish to "Opt-Out." The deliberations and legal advice did not reflect any final agency policy or position.
10	ICE FOIA 10-2674.0003590 - ICE FOIA 10- 2674.0003600	10/1/2010	Deliberative email between OPLA attorneys and SC.	Email between OPLA attorneys and SC staff containing deliberations and legal advice about the policies and procedures for LEA's participation in SC. The deliberations and legal advice did not reflect any final agency policy or position.
11	ICE FOIA 10-2674.0003697 - ICE FOIA 10-2674.0003698	8/21/2010	Deliberative email between OPLA attorneys and SC.	Email between OPLA attorneys and SC staff containing deliberations and legal advice about the policies and procedures for LEA's participation in SC. The deliberations and legal advice did not reflect any final agency policy or position.
12	ICE FOIA 10-2674.0003699 - ICE FOIA 10-2674.0003707	9/7/2010	Email deliberation between OPLA attorneys.	Email between OPLA attorneys containing deliberations and legal advice about the policies and procedures for LEA's participation in SC. The deliberations and legal advice did not reflect any final agency policy or position.
13	ICE FOIA 10-2674.0003708 - ICE FOIA 10-2674.0003717	9/29/2010	Email deliberation between SC and OPLA attorneys.	Deliberations and legal advice about the policies and procedures for LEA's participation in SC. The deliberations and legal advice did not reflect any final agency policy or position.

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14	ICE FOIA 10-2674.0003718 - ICE FOIA 10- 2674.0003721	9/29/2010	Email deliberation between SC and OPLA attorneys.	Deliberations and legal advice pertaining to procedures for LEA's participation in SC. The deliberations and legal advice did not reflect any final agency policy or position.
15	ICE FOIA 10-2674.0003722 - ICE FOIA 10-2674.0003725	9/29/2010	Email deliberation between SC and OPLA attorneys.	Deliberations and legal advice pertaining to procedures for LEA's participation in SC. The deliberations and legal advice did not reflect any final agency policy or position.
16	ICE FOIA 10-2674.0003726 - ICE FOIA 10-2674.0003730	9/29/2010	Email deliberation between SC and OPLA attorneys.	Deliberations and legal advice pertaining to procedures for LEA's participation in SC. The deliberations and legal advice did not reflect any final agency policy or position.
17	ICE FOIA 10-2674.0003736 - ICE FOIA 10-2674.0003739	9/29/2010	Email deliberation between SC and OPLA attorneys.	Deliberations and legal advice pertaining to procedures for LEA's participation in SC. The deliberations and legal advice did not reflect any final agency policy or position.
18	ICE FOIA 10-2674.0003740 - ICE FOIA 10- 2674.0003748	9/30/2010	Draft memorandum from OPLA attorneys.	Draft memorandum with prepared to discuss issues related to the mandatory nature of SC in 2013.
19	ICE FOIA 10-2674.0003749 - ICE FOIA 10-2674.0003753	9/30/2010	Email deliberation between OPLA attorneys.	Deliberations and legal advice pertaining to procedures for LEA's participation in SC. The deliberations and legal advice did not reflect any final agency policy or position.
20	ICE FOIA 10-2674.0003754 - ICE FOIA 10-2674.0003759	9/7/2010	Draft of a legal memorandum prepared by OPLA	Draft internal memorandum containing deliberations and legal advice about the policies and procedures for SC, including options for states that wish to "Opt-Out." The deliberations and legal advice did not reflect any final agency policy or position.
21	ICE FOIA 10-2674.0003775 - ICE FOIA 10-2674.0003779	9/29/2010	Email deliberation between SC and OPLA attorneys.	Deliberations and legal advice pertaining to procedures for LEA's participation in SC. The deliberations and legal advice did not reflect any final agency policy or position.
22	ICE FOIA 10-2674.0009137 - .0009145	10/2/2010	Draft Memorandum from OPLA to Beth Gibson	Legal analysis of the mandatory nature of the 2013 Secure Communities deployment
23	ICE FOIA 10-2674.0009198	9/2/2010	Emails from Senior Management to OPA	Attorney advice from OPLA to the Office of Public Affairs.

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24	ICE FOIA 10-2674.0010589 - .0010592	7/29/10 -8/5/10	Emails string within OPLA	Request for legal advice regarding issues surrounding Secure Communities in preparation for a meeting with officials in CA, and a discussion of the appropriate statutes
25	ICE FOIA 10-2674.0010639 - .0010641	8/2/2010	Email string from SC asking OPLA for legal advice	Predecisional discussion of upcoming meeting and legal advice in preparation for a meeting with representatives from CA
26	ICE FOIA 10-2674.0010752	9/15/2010	Email from Associate Legal Advisor to OPLA team	OPLA Comments and legal opinion regarding a draft response letter to a county in CA
27	ICE FOIA 10-2674.0010795	10/2/2010	Memo from the Deputy Principal Legal Advisor to Beth Gibson	Deliberations and legal opinions regarding SC becoming mandatory in 2013
28	ICE FOIA 10-2674.0010812	9/6/2010	Email from OPLA Section Chief to OPLA staff	Predecisional discussion of legal issues surrounding Secure Communities
29	ICE FOIA 10-2674.0010813	9/6/2010	Continuation of email from OPLA Section Chief to OPLA Staff	Predecisional discussion of legal issues surrounding Secure Communities (Continued)
30	ICE FOIA 10-2674.0010815	Unknown	Memo from an Associate Legal Advisor to Peter Vincent	Deliberation and legal opinion regarding the Opt-out issue
31	ICE FOIA 10-2674.0010816	Unknown	Memo from an Associate Legal Advisor to Peter Vincent	Deliberation and legal opinion regarding the Opt-out issue (Continued)
32	ICE FOIA 10-2674.0010817	Unknown	Memo from an Associate Legal Advisor to Peter Vincent	Deliberation and legal opinion regarding the Opt-out issue (Continued)
33	ICE FOIA 10-2674.0010818	Unknown	Memo from an Associate Legal Advisor to Peter Vincent	Deliberation and legal opinion regarding the Opt-out issue (Continued)
34	ICE FOIA 10-2674.0010819	Unknown	Memo from an Associate Legal Advisor to Peter Vincent	Deliberation and legal opinion regarding the Opt-out issue (Continued)
35	ICE FOIA 10-2674.0010820	Unknown	Memo from an Associate Legal Advisor to Peter Vincent	Deliberation and legal opinion regarding the Opt-out issue (Continued)

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36	ICE FOIA 10-2674.0010824	10/15/2010	Email from Associate Legal Advisor to OPLA	Asks about an attorney work product
37	ICE FOIA 10-2674.0010825	10/15/2010	Email from Rachel Canty to Associate Legal Advisor	Asks for an attorney work product
38	ICE FOIA 10-2674.0010833	9/9/2010	Email from Associate Legal Advisor to OPLA team	Deliberation and discussion regarding mandatory participation by 2013
39	ICE FOIA 10-2674.0010839	10/1/2010	Email from Associate Legal Advisor to OPLA team	Deliberation and discussion of legal issues surrounding mandatory participation by 2013
40	CE FOIA 10-2674.0010840	10/1/2010	Continuation of Email from Associate Legal Advisor to OPLA team	Deliberation and discussion of legal issues surrounding mandatory participation in 2013 (Continued)
41	ICE FOIA 10-2674.0010842	Unknown	Memo from Associate Legal Advisor to Peter Vincent regarding Secure Communities being mandatory in 2013	Deliberation and discussion of legal issues surrounding mandatory participation in 2013
42	ICE FOIA 10-2674.0010843	Unknown	Memo from Associate Legal Advisor to Peter Vincent regarding Secure Communities being mandatory in 2013	Deliberation and discussion of legal issues surrounding mandatory participation in 2013 (Continued)
43	ICE FOIA 10-2674.0010844	Unknown	Memo from Associate Legal Advisor to Peter Vincent regarding Secure Communities being mandatory in 2013	Deliberation and discussion of legal issues surrounding mandatory participation in 2013 (Continued)
44	ICE FOIA 10-2674.0010845	Unknown	Memo from Associate Legal Advisor to Peter Vincent regarding Secure Communities being mandatory in 2013	Deliberation and discussion of legal issues surrounding mandatory participation in 2013 (Continued)

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45	ICE FOIA 10-2674.0010846	Unknown	Memo from Associate Legal Advisor to Peter Vincent regarding Secure Communities being mandatory in 2013	Deliberation and discussion of legal issues surrounding mandatory participation in 2013 (Continued)
46	ICE FOIA 10-2674.0010847	Unknown	Memo from Associate Legal Advisor to Peter Vincent regarding Secure Communities being mandatory in 2013	Deliberation and discussion of legal issues surrounding mandatory participation in 2013 (Continued)
47	ICE FOIA 10-2674.0010848	Unknown	Memo from Associate Legal Advisor to Peter Vincent regarding Secure Communities being mandatory in 2013	Deliberation and discussion of legal issues surrounding mandatory participation in 2013 (Continued)
48	ICE FOIA 10-2674.0010849	Unknown	Memo from Associate Legal Advisor to Peter Vincent regarding Secure Communities being mandatory in 2013	Deliberation and discussion of legal issues surrounding mandatory participation in 2013 (Continued)
49	ICE FOIA 10-2674.0011149 - 0011151	Multiple Dates	Email from a Secure Communities Employee to an ICE Attorney seeking legal advice and recommendations and the Attorney's response to that inquiry	Portions of the e-mail have been withheld to protect ICE's deliberative process. The withheld communications contain the deliberative opinions and recommendations of ICE and FBI employees. Further, the communications do not reflect any final agency policy or position. In addition, portions of the e-mail have been withheld to protect attorney-client communications. The withheld portions of the e-mail contain the legal advice, recommendations, and conclusions of an ICE attorney.
50	ICE FOIA 10- 2674.0003211 - ICE FOIA 10-2674.0003219	9/13/2010	Emails between SC PMO staff regarding draft response letter attachment to the County Counsel, County of Santa Clara	Attorney comments and edits to draft SC letter to Santa Clara County Counsel.

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51	ICE FOIA 10-2674.0002210 - ICE FOIA 10-2674.0002212	9/3/2010	Email correspondence between SC staff and OPLA	Draft language under legal review regarding: (1) actual deployment of IDENT/IAFIS interoperability to an LEA; (2) an LEA's option to opt-out of SC; and (3) alternative methods for DHS to be informed of a subject's arrest.
52	ICE FOIA 10-2674.0002034 - ICE FOIA 10-2674.0002035	07/29/2010 - 07/30/2010	Email correspondence between OPLA and OAS	Internal discussion and legal advice related to SC being voluntary program, and whether making participation in SC mandatory has a basis in law. Discussion of legal issues and applicable law.
53	ICE FOIA 10-2674.0002030 - ICE FOIA 10-2674.0002033	7/29/2010	Email correspondence between OPLA and OAS	Internal discussion and legal advice related to SC being voluntary program, and whether making participation in SC mandatory has a basis in law. Discussion of legal issues and applicable law.
54	ICE FOIA 10-2674.0002027 - ICE FOIA 10-2674.0002029	07/29/2010 - 07/30/2010	Email correspondence between OPLA and OAS	Internal discussion and legal advice related to SC being voluntary program, and whether making participation in SC mandatory has a basis in law. Discussion of legal issues, applicable law, and options available.
55	ICE FOIA 10-2674.0002024 - ICE FOIA 10-2674.0002026	07/29/2010 - 07/30/2010	Email correspondence between OPLA and OAS	Internal discussion and legal advice related to SC being voluntary program, and whether making participation in SC mandatory has a basis in law. Discussion of legal issues and applicable law.
56	ICE FOIA 10-2674.0002022 - ICE FOIA 10-2674.0002023	07/29/2010 - 07/30/2010	Email correspondence between OPLA and OAS	Internal discussion and legal advice related to SC being voluntary program, and whether making participation in SC mandatory has a basis in law.
57	ICE FOIA 10-2674.0003162 - ICE FOIA 10-2674.0003169	9/16/2010	Email among ICE Office of the Principal Legal Advisor (OPLA) attorneys with one attachment	Memorandum discussing whether a law enforcement agency may "opt out" of the SC initiative and email communications among attorneys regarding the memorandum and reflecting client-supplied information.

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58	ICE FOIA 10-2674.0002509 ICE FOIA 10-2674.0002521	10/1/2010	Email between ICE senior leadership and among OPLA attorneys with one attachment –a draft OPLA memo entitled “Secure Communities –Mandatory in 2013.”	Email between ICE senior leadership for the purpose of seeking review of a predecisional draft of SC promotional materials. The draft SC promotional materials did not reflect any final agency policy or position. The draft memo contains legal advice provided by OPLA and did not reflect any final agency policy or position.
59	ICE FOIA 10-2674.0002522 ICE FOIA 10-2674.0002533	10/01/2010, 10/02/2010	Email among OPLA attorneys with one attachment –a draft OPLA memo entitled “Secure Communities–Mandatory in 2013.”	Email between OPLA attorneys containing draft legal opinion regarding whether SC will be mandatory in 2013. The draft OPLA email contains legal advice and did not reflect any final agency policy or position. The draft memo contains legal advice provided by OPLA and did not reflect any final agency policy or position.
60	ICE FOIA 10-74.0002534 ICE FOIA 10-74.0002547	10/01/2010, 10/02/2010	Email between ICE senior leadership and among OPLA attorneys with one attachment –a draft OPLA memo entitled “Secure Communities –Mandatory in 2013.”	Email between ICE senior leadership for the purpose of seeking review of a predecisional draft of SC promotional materials. The draft SC promotional materials did not reflect any final agency policy or position. The draft memo contains legal advice provided by OPLA and did not reflect any final agency policy or position.
61	ICE FOIA 10-74.0002548 ICE FOIA 10-74.0002555	10/01/2010, 10/04/2010	Email among OPLA attorneys containing a draft OPLA memo entitled “Secure Communities –Mandatory in 2013.”	Email between OPLA attorneys containing draft legal opinion regarding whether SC will be mandatory in 2013. The OPLA email contains legal advice provided by OPLA and did not reflect any final agency policy or position.
62	ICE FOIA 10-2674.0002594 - ICE FOIA 10-2674.0002597	7/29/2010 7/30/2010	Email among OPLA attorneys.	Email between OPLA attorneys containing draft legal opinion regarding whether SC will be mandatory in 2013. The draft OPLA email contains legal advice and did not reflect any final agency policy or position. The draft memo contains legal advice provided by OPLA and did not reflect any final agency policy or position. Language contains specific information related to law enforcement operations. Dissemination of specific information could undermine efforts of law enforcement.

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63	ICE FOIA 10-2674.0002651 - ICE FOIA 10-2674.0002656	9/6/2010- 9/29/2010	Emails among OPLA attorneys and OPLA and ICE senior leadership related to developing policy on ICE SC 'opt-out'	Comments / suggestion related to draft language. The draft language did not reflect any final agency policy or position. Legal counsel provided by OPLA attorneys to client related development of final policy.
64	ICE FOIA 10-2674.0002661 - ICE FOIA 10-2674.0002665	9/3/2010- 12/15/2010	Emails among OPLA attorneys and OPLA and ICE senior leadership related to developing policy on ICE SC 'opt-out'	Comments / suggestion related to developing policy on opt-out. The draft language did not reflect any final agency policy or position. Legal advice provided by OPLA attorneys to client.
65	ICE FOIA 10-2674.0002666 - ICE FOIA 10-2674.0002675	10/2/2010	Draft document from OPLA to ICE senior leadership related to Secure Communities deployment.	The draft memo contains legal advice provided by OPLA and did not reflect any final agency policy or position.
66	ICE FOIA 10-2674.0002676 - ICE FOIA 10-2674.0002685	10/2/2010	Draft document from OPLA to ICE senior leadership related to Secure Communities deployment.	The draft memo contains legal advice provided by OPLA and did not reflect any final agency policy or position.
67	ICE FOIA 10-2674.0002686 - ICE FOIA 10-2674.0002693	12/15/2010	Draft document from OPLA attorneys to OPLA leadership related to Secure Communities deployment.	The draft memo contains legal advice provided by OPLA and did not reflect any final agency policy or position.
68	ICE FOIA 10-2674.0002713 - ICE FOIA 10-2674.0002721	10/2/2010	Draft document from OPLA to ICE senior leadership related to Secure Communities deployment.	The draft memo contains legal advice provided by OPLA and did not reflect any final agency policy or position.
69	ICE FOIA 10-2674.0002903- 0002911	9/6/2010	ELD OPLA Email with background info on SC	Attorney legal analysis of opt out and opt out attorney memo for OPLA. This information was prepared from an attorney for the client and was deliberative not reflecting final agency policies and positions.

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70	ICE FOIA 10-2674.0002912-0002976	9/20/2010	Email from OPLA containing attachments with drafts of documents in preparation for meetings	Draft language and attorney recommendations sent by ELD OPLA.
71	ICE FOIA 10-2674.0002977-0002992	10/1/2010	Email request for OPLA to review draft promotional material and draft "mandatory" memorandum.	Draft memo language and requests for legal advice regarding possible language to use in promotional materials. This information did not reflect final agency policies or positions.
72	ICE FOIA 10-2674.0002993 - ICE FOIA 10-2674.0002996	10/1/2010	Email between SC and ICE OPLA	Analysis and legal authority for the proposition that participation in Secure Communities will be mandatory in 2013.
73	ICE FOIA 10-2674.0002997 - ICE FOIA 10-2674.0003001	10/4/2010	Emails between SC and ICE OPLA	Analysis and legal authority relating to possible mandatory participation in SC and proposed draft legislation.
74	ICE FOIA 10-2674.0003002 - ICE FOIA 10-2674.0003007	10/4/2010	Emails between SC and ICE OPLA	Analysis and legal authority relating to possible mandatory participation in SC and proposed draft legislation.
75	ICE FOIA 10-2674.0003008 - ICE FOIA 10-2674.0003022	10/4/2010	Emails between SC and ICE OPLA	Discussion regarding attached pre-decisional draft of new language describing the manner in which SC program operates. Attached draft memo also discusses legal authority for the proposition that participation in Secure Communities will be mandatory in 2013.
76	ICE FOIA 10-2674.0003023 - ICE FOIA 10-2674.0003026	10/12/2010	Emails and attachment between SC and ICE OPLA	Discussion regarding attached pre-decisional draft of new language describing the manner in which SC program operates.
77	ICE FOIA 10-2674.0003140 - ICE FOIA 10-2674.0003143	11/5/2010	Emails between SC and OPLA.	Discussion and comments regarding proposed changes to Kansas MOA. Comments discuss possible inclusion or exclusion of specific language regarding racial profiling, including legal and policy implications. Emails also include discourse on possible reasons states and localities might wish to opt-out as well as opt-out permissibility.

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78	ICE FOIA 10-2674.0003146 - ICE FOIA 10-2674.0003148	9/3/2010	SC Memo	Email attachment regarding opt-out viability and procedures. Attached memo also includes analysis and legal authority for the proposition that participation in Secure Communities will be mandatory in 2013.
79	ICE FOIA 10-2674.0003149 - ICE FOIA 10-2674.0003153	11/17/2010	Draft letter from ICE to locality.	Draft letter to county manager regarding locality's possible participation in SC.
80	ICE FOIA 10-2674.0003154 - ICE FOIA 10-2674.0003157	11/17/2010	Draft letter from ICE to locality.	Draft letter to county manager regarding locality's possible participation in SC. The draft edits analyze the option and implications of specific references to prior communications between the locality and SC.
81	ICE FOIA 10-2674.0012488 - ICE FOIA 10-2674.0012493	10/1/2010	10-1-10 Predecisional draft (Comments) document	Draft document contains legal advice from OPLA staff regarding opting out and SC. This draft document with numerous comments and revisions was withheld
82	ICE FOIA 10-2674.0010825	9/9/2010	Continuation of Email from Beth Gibson to SecureCommunities Assistant Director	Predecisional discussion of statutory provision regarding the issues surrounding interoperability
83	ICE FOIA 10-2674.0011366 - 0011374	10/4/2010	Draft Response to Santa Clara County	Portions of the response to Santa Clara that were not finalized and that received comments on legal sufficiency from OPLA. These portions of the response were deliberative and contained legal advice from counsel.
84	ICE FOIA 10-2674.0011833 - 0011847	8/3/2010	Email from OPLA regarding inquiry from Chairwoman Lofgren	Suggestions as to the content and legal sufficiency of the response to the Chairwoman. These discussions were deliberative of the content of the reply to the Chairwoman and did not reflect any final agency policy or position. This also included legal advice from counsel to the client.
85	ICE FOIA 10-2674.0011848 - 0011849	9/21/2010	Emails from OPLA regarding local agency MOU's	Statements regarding deliberations on activating one specific jurisdiction and how activation should take place. These discussions were deliberative of the activation itself and did not reflect any final agency policy or position.

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86	ICE FOIA 10-2674.0012487	9/16/2010	Opt-out Background document	Legal advice drafted by OPLA staff for SC staff.
87	ICE FOIA 10-2674.0012488 - ICE FOIA 10-2674.0012493	10/1/2010	10-1-10 Predecisional draft (Comments) document	Draft document contains legal advice from OPLA staff regarding opting out and SC. This draft document with numerous comments and revisions was withheld
88	ICE FOIA 10-2674.0010794 - ICE FOIA 10-2674.0010800	10/2/2010	Memo from the Deputy Principal Legal Advisor to Beth Gibson	Deliberations and legal opinions regarding SC becoming mandatory in 2013
89	ICE FOIA 10-2674.0009132 - .0009145	10/2/2010	Draft Memorandum from OPLA to Beth Gibson	Legal analysis of the mandatory nature of the 2013 Secure Communities deployment
90	ICE FOIA 10-2674.0012494 - ICE FOIA 10-2674.0012503	10/2/2010	Draft memo on Secure Communities becoming mandatory in 2013	Draft document contains legal deliberation and advice from OPLA staff regarding SC becoming mandatory by 2013.
91	ICE FOIA 10-2674.0011360- 0011365	9/7/2010	Opt Out Memorandum between OPLA ELD to the Principal Legal Advisor	The draft material of the legal justification for interoperability and whether or not participation is mandatory. These discussions were deliberative of the final form of the draft and did not reflect any final agency policy or position and consisted of the privileged legal counsel from attorneys advising their client.