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NDLON et al v. ICE et al, 10-cv-3488

Plaintiffs' Rapid Production List

I. Data and statistics

- a. Copies of all regularly generated statistical reports on S-Comm (monthly reports, bi-weekly reports, regional, national, etc.)
- b. Copies of any cumulative statistics compiled on S-Comm at any juncture

II. Opt-Out Records - National policy memoranda, legal memoranda or communication relating to the ability of states or localities to opt-out or limit their participation in S-Comm

III. Copies of executed agreements related to S-Comm

- a. Agreements between ICE/DHS and FBI
- b. Agreements between DHS/FBI and local government or local law enforcement agencies

IV. Records that contain a technical explanation of all databases controlled or used by defendants which may contain data enumerated in Sections 2 & 3 of the request, including records that contain,

- a. a list of all databases that contain information about individuals that are identified by S-Comm
- b. a list of all databases that contain data and statistics that ICE monitors related to S-Comm
- c. a list of all the fields contained in each database (for example, pages from a manual that list the fields)
- d. any records that indicate how interoperability functions, including how responses are coded and routed, Originating Agency Identifier (ORI) coding, any other coding by geography or type, which databases are searched, and screen shots of Immigrant Alien Queries (IAQs) and Immigrant Alien Responses (IARs)

V. DHS-OIG Documents Identified in Response to the FOIA Request but Referred to ICE for Direct Response

VI. Records Related to the Creation or Revision (including drafts, memoranda, correspondence, and communications) of Certain Enumerated Media Documents:

- a. U.S. Department of Homeland Security, News Release, *Secretary Napolitano and ICE Assistant Secretary Morton Announce That Secure Communities Initiative Identified More than 111,000 Criminal Aliens in Its First Year*, November 12, 2009 (attached).
- b. U.S. Department of Homeland Security, News Release, *Secretary Napolitano and ICE Assistant Secretary Morton Announce that the Secure Communities Initiative Identified More than 111,000 Aliens Charged or Convicted of Crimes in its First Year*, also dated November 12, 2009 (attached).

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- c. U.S. Department of Homeland Security, Immigration Customs Enforcement, *Get the Facts: Secure Communities Media Plan for April 26-30*, April 23, 2009 (attached).
- VII. All Reports & Memoranda Reporting on the Secure Communities Program to the Secretary of the Department of Homeland Security or to the Assistant Secretary of Homeland Security in Charge of Immigration and Customs Enforcement or to the White House.**
- VIII. Specific enumerated records related to Secure Communities and racial profiling:**
 - a. Records created in relation to the drafting of Section 1.0 of the Secure Communities Standard Operating Procedures (SOP) or Section VIII of the standard Secure Communities Memorandum of Agreement
 - b. Records containing ICE plans to monitor for racial profiling or other Constitutional violations in local jurisdictions pursuant to Section 1 of the SOP or Section VIII of the MOA
 - c. Records related to the evaluation of any state or jurisdiction pursuant to Section 1 of the SOP or Section VIII of the MOA
- IX. Records of ICE communications with the State of California, the State of Florida, or the State of Texas related to costs, reimbursements, monetary agreements, or monetary incentives related to Secure Communities**
- X. Specific enumerated documents referenced in ICE FOIA reading room documents (see appendix)**