

November 20, 2025

Sent via ICE SecureRelease Portal

U.S. Immigration & Customs Enforcement  
500 12th Street SW, Stop 5009  
Washington, DC 20536-5009  
Phone: (866) 633-1182

**Re: Freedom of Information Act Request regarding Leeds, Alabama Police Department**

Dear FOIA Officers,

The Alabama Coalition for Immigrant Justice, the Hispanic and Immigrant Center of Alabama, Somos Alabama, Tuscaloosa Latino Coalition, the National Immigration Project, and the Center for Constitutional Rights submit this request for records pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, to obtain information regarding Immigration and Customs Enforcement (“ICE”) and the Leeds, Alabama Police Department (“Leeds PD”), including information regarding collaboration and cooperation between ICE and Leeds PD and communications between ICE and Leeds PD officials. We ask that you please direct this request to all appropriate offices and departments within ICE, including but not limited to: the ICE Office of Management and Facilitation and all appropriate sub-components and custodians; Office of Enforcement and Removal Operations (ERO); Homeland Security Investigations (HSI), and ICE’s New Orleans Field Offices.

Requesters seek a fee waiver, pursuant to 5 U.S.C. § 552(a)(4)(A)(iii), because the records sought will contribute to the public’s understanding of ICE’s cooperation and collaboration Leeds PD.

**I. Definitions**

- Record(s). In this request the term “record(s)” includes, but is not limited to, all Records or communications preserved in electronic (including metadata) or written form, such as correspondences, emails, documents, data, videotapes, audio tapes, faxes, files, guidance, guidelines, evaluations, instructions, analyses, memoranda, agreements, notes, orders, policies, procedures, legal opinions, protocols, reports, rules, talking points, technical manuals, technical specifications, training manuals, studies, or any other Record of any kind.
- Agreement(s). In this request the term “agreement(s)” refers to any agreement, written or otherwise; communications; contracts and/or supplements, modifications or addendums to contracts or agreements.
- Communication(s). In this request the term “communication” means the transmittal of information (in the forms of facts, ideas, inquiries or otherwise).

**II. Records Requested:**

We request all records reflecting the following:

1. Any and all contracts, memorandum of understanding, and/or agreements, including any amendments, addendums, and modifications, between Leeds PD, or Leeds PD officials, and ICE;
2. Any and all payments between Leeds PD, or Leeds PD officials, and ICE;

3. From November 5, 2024, to the present, any and all communications, including electronic communications and attached documents, between ICE and Leeds PD, including but not limited to:
  - a. Communications related to any traffic stops, investigations, and detentions on August 5, 2025;
  - b. Communications related to any warrant service, investigations, arrests, and detentions on August 28, 2025;
  - c. Communications related to any traffic stops, investigations, and detentions on October 28, 2025; and
  - d. Communications related to any ride-alongs, or any requested ride-alongs.

We ask that any records that exist in electronic form be provided electronically in their native file format, if possible. Alternatively, we request that records be provided electronically in a text-searchable, static-image format (PDF), in the best image quality in the agency's possession, and that the records be provided in separate, *Bates*-stamped files. We request that any PDF files produced **not** be password-protected. Please produce with the records any metadata and load files. If codes are employed, please also produce any documents in your possession explaining the codes employed, and what they signify.

If under applicable law any of the information is considered exempt, please describe in detail the nature of the information withheld, the specific exemption or privilege upon which the information is withheld, and whether the portions of withheld documents containing non-exempt or non-privileged information have been provided. Requesters seek the release of all portions of otherwise exempt material that can be segregated.

### III. The Requesters

The Alabama Coalition for Immigrant Justice (“ACIJ”) is a 501(c)(3), tax-exempt, not-for-profit coalition of individuals and organizations working for the rights and dignity of all people by cultivating just policies, encouraging grassroots leadership and participation, building alliances, and amplifying the voices and contributions of immigrants in Alabama. ACIJ works to nurture civic engagement in immigrant communities and provides vital information to ensure immigrant families are prepared and safe in uncertain times.

The Hispanic and Immigrant Center of Alabama is a community development and advocacy organization that champions economic equality, civic engagement, and social justice for Latino and immigrant families in Alabama.

Somos Alabama is a non-profit organization dedicated to walking alongside the Hispanic community in Alabama to advance health, wellbeing, financial stability, and justice and building a just and inclusive future together.

The Tuscaloosa Latino Coalition (“TLC”), is dedicated to providing comprehensive support and services to the Hispanic and Latino community in Tuscaloosa and surrounding areas. TLC collaborates with public and private agencies throughout Alabama to empower our community members to achieve their full potential.

The National Immigration Project is a national 501(c)(3), tax-exempt, not-for-profit organization dedicated to providing legal assistance and support to immigrant communities and advocating on behalf of noncitizens. Its members and supporters include attorneys, legal workers, law students, judges, jailhouse lawyers, grassroots advocates, community organizations, and people who have faced detention or deportation and their loved ones. The National Immigration Project provides technical and litigation assistance, participates in impact litigation, provides legal training to

the bar and the bench, regularly publishes practice advisories and community resources on immigration law topics, and builds bridges across movements to ensure that those who are impacted by the U.S. immigration and criminal legal systems are uplifted and supported.

The Center for Constitutional Rights (“CCR”) is a non-profit, public interest legal and advocacy organization that engages in the fields of civil and international human rights. CCR’s diverse issue areas include litigation and advocacy around immigration, as well as racial and ethnic profiling. One of CCR’s primary activities is the publication of newsletters, know-your-rights handbooks, legal analysis of current immigration law issues, and other similar materials for public dissemination. These and other materials are available through CCR’s Development, Communications, and Advocacy Departments. CCR operates a website, <http://ccrjustice.org>, which addresses the issues on which the Center works. CCR staff members often serve as sources for journalists and media outlets, including on issues related to racial justice, racial discrimination, and immigrant rights. In addition, CCR regularly issues press releases, has an active social media presence with thousands of followers, and also issues regular email updates sent to over 50,000 supporters about developments and news pertaining to CCR’s work.

#### **IV. Request for Expedited Processing**

We request expedited processing of the above Request pursuant to applicable law and regulations. 5 U.S.C. § 552(a)(6)(E)(I); 6 C.F.R. § 5.5(e)(1)(ii)–(iv). There is a “compelling need” for these records, as defined in the statute and regulations, because the information requested is urgently needed by an organization primarily engaged in disseminating information in order “to inform the public about actual or alleged Federal Government activity.” 5 U.S.C. § 552(a)(6)(E)(v)(II); 6 C.F.R. § 5.5(e)(ii).

There is an urgent need to inform the public about Leeds PD’s apparent increased cooperation and collaboration with ICE, which has resulted in several high-profile incidents that have greatly impacted the local community.<sup>1</sup> As noted above, the work of the requesters is in service of the rights of non-citizens, their families and communities, and so the information requested would be of incredible and immediate benefit to our constituents. Furthermore, the requesters are engaged primarily in disseminating information.

#### **V. Request for Fee Waiver**

The requesters are not-for-profit organizations that work on behalf of immigrant communities and ask that the agency waive all fees associated with this request. The requesters engage in significant and regular advocacy in support of immigrants and immigrant communities across the country, including in Alabama.

Requesters are entitled to a waiver of all costs because disclosure of 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* 6 C.F.R. § 5.11(k) (records furnished without charge or at a reduced rate if the information is in the public interest, and disclosure is not in the commercial interest of the institution). Requesters meet the requirements for a fee waiver: this request concerns the operations and activities of the

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<sup>1</sup> Heather Gann, *Alabama immigration advocate detained by ICE in traffic stop, family says: ‘Just heartbreaking and discouraging’*, AL.com (Aug. 7, 2025), <https://www.al.com/news/2025/08/alabama-immigration-advocate-detained-by-ice-in-traffic-stop-family-says-just-heartbreaking-and-discouraging.html>; Drew Taylor, *4 schools briefly placed on lockdown in Leeds*, CBS 42 (Aug. 28, 2025), <https://www.cbs42.com/news/local/4-schools-briefly-placed-on-lockdown-in-leeds/#:~:text=%28TRIBUNE%29%20%E2%80%94%20All%20four%20schools,measure%20thana%20a%20defensive%20one..>

government; disclosure of information that is the subject of this request will likely contribute to a significant public understanding of government operations and activities; the Requesters' primary interest is in disclosure; and the Requesters have no commercial interest in the information. *See* 6 C.F.R. § 5.11(k).

A fee waiver also would fulfill Congress' intent in amending the FOIA. *Judicial Watch, Inc. v. Rossoti*, 326 F.3d 1309, 1312 (D.C. Cir. 2003) (discussing that Congress intended the FOIA to be construed broadly to favor fee waiver for noncommercial requests). In addition, both Requesters can widely disseminate the requested information. *Judicial Watch*, 326 F.3d at 1301 (finding a fee waiver appropriate when the requester explained, in detailed and non-conclusory terms, how and to whom it would disseminate the information it received).

#### **A. Disclosure of the Information is in the Public Interest**

Disclosure of the requested information is in the public interest. It will contribute significantly to the public understanding of government conduct, specifically Leeds PD's collaboration with and participation in ICE's immigration enforcement activities.

Requesters have the capacity and intent to disseminate widely the requested information to the public. We will review, analyze and and/or summarize the information obtained through this FOIA. In addition, the requesters' staff will speak publicly and publish related written materials to be shared with the public, organizational members, and the academic community. Requesters will make the information available through their websites, which are freely accessible by any member of the public. For example, in 2024, the National Immigration Project received 374,892 page views with the top resource garnering 1,397 views. Finally, the requesters are in frequent contact with national print and news media and plan to share the information from the FOIA disclosures with interested media.

#### **B. Disclosure of the Information is Not Primarily in the Commercial Interest of the Requesters**

As tax-exempt, not-for-profit educational and charitable organizations, attorneys, noncitizens, and any other interested members of the public may obtain information about immigration-related issues for free through various media. The requested information is sought for the purpose of disseminating it to members of the public and each organization's constituencies so that they gain an understanding of ICE's cooperation and collaboration with local law enforcement. The requested information is not for the purpose of commercial gain.

#### **VI. Address for Productions**

Thank you for your consideration of this request. I certify that all information here is true and correct. We look forward to your response to our request within twenty (20) business days, as required by statute. 5 U.S.C. § 552(a)(6)(A)(i). Please furnish records as soon as they are identified via email to [csandley@ccrjustice.org](mailto:csandley@ccrjustice.org) and by mail to:

CJ Sandley  
Center for Constitutional Rights  
P.O. Box 486  
Birmingham, AL 35201

Thank you in advance for your prompt response to this request.

Sincerely,

A handwritten signature in blue ink that reads "CJ Sandley". The signature is written in a cursive style with a large, sweeping flourish at the end.

CJ Sandley  
Senior Staff Attorney  
Center for Constitutional Rights  
P.O. Box 486  
Birmingham, AL 35201  
(212) 614-6443