

November 20, 2025

Sent via Certified U.S. Mail

Chief Paul A. Irwin, Jr.  
Leeds Police Department  
1040 Park Drive  
Leeds, AL 35094

**Re: Open Records Act Request**

Dear Chief Irwin,

Alabama citizens Allison Hamilton, C.J. Sandley, the Alabama Coalition for Immigrant Justice, the Hispanic and Immigrant Center of Alabama, Somos Alabama, and Tuscaloosa Latino Coalition, together with the National Immigration Project and the Center for Constitutional Rights submit this request for records pursuant to the Alabama Open Records Act, Ala. Code § 36-12-40, to obtain information regarding Immigration and Customs Enforcement (“ICE”) and the Leeds 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 divisions and departments within the 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, including but not limited to 287(g) agreements;
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 request that records be provided electronically, by e-mail attachment or file transfer if available or CD-ROM/USB drive if not. 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**

Allison Hamilton is an Alabama citizen who is the Executive Director of the Alabama Coalition for Immigrant Justice.

C.J. Sandley is an Alabama citizen who is a Senior Staff Attorney at the Center for Constitutional Rights.

The Alabama Coalition for Immigrant Justice (“ACIJ”) is an Alabama-based 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. Fees**

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. The requested documents will be made available to the general public, and this request is not being made for commercial purposes. In the event that there are fees, please inform us of the total charges in advance of fulfilling this request.

#### **V. Address for Productions**

Thank you for your consideration of this request. We look forward to your response to our request within fifteen (15) business days, as required by Executive Order 734. Please furnish records as soon as they are identified via email to [csandley@ccrjustice.org](mailto:csandley@ccrjustice.org) or 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,



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