

VIA E-EMAIL MOfoia@cityofchicago.org

March 5, 2018

Office of the Mayor
City Hall - 121 N. LaSalle, Room 507
Chicago, IL 60602

Re: Freedom of Information Act Request: Immigration and Customs Enforcement Raids in the City of Chicago

Requesters submit this Freedom of Information Act request to obtain information related to the planning, execution, cancellation, delay, alteration or adjustment of Operation Safe City or any Immigration and Customs Enforcement operations provided to the city of Chicago from January 2018 through March 2018.

On February 27, 2018, news outlets reported U.S. Immigration and Customs Enforcement (“ICE”) completed a series of operations in Northern California, which resulted in the detention of more than 150 suspected undocumented immigrants. On February 24, 2018, Oakland Mayor Libby Schaaf issued a warning to Oakland residents that “multiple credible sources” confirmed that ICE was planning on having a massive operation in their city.

In accordance with the Freedom of Information Act, 5 U.S.C. § 552, we request the following records that are described below or contain the information described below:

1. All records, including but not limited to policies, protocols, notes, memoranda, communications, manuals, forms or checklists, and records described in 5 U.S.C. §§ 552(a)(2)(B) & (C), including those prepared by the Mayor of the City of Chicago, Chicago Police Department, Chicago ICE Enforcement and Removal Operations Field Office, Homeland Security Investigations (HSI) Field Offices and ICE Headquarters, that:
 1. Describe Operation Safe City or any related immigration operations or raids, or their planning or execution;
 1. Describe the history of Operation Safe City in Chicago, immigration raids, or related operations, including any cancellation, delay, alteration or adjustment of the operations from January 2018 through March 2018;
 1. Describe or reflect how targets are identified for Operation Safe City raids or related operations, including but not limited to, identification of any state or local databases that were used to identify targets for the operations from January 2018 through March 2018;
 1. Describe or reflect the databases or technological infrastructure, such as biometric devices or databases, used to support for Operation Safe City raids or related operations from January 2018 through March 2018;

1. Describe or reflect any coordination with fusion centers or federal agencies, such as the Alcohol, Firearms, and Tobacco (ATF) Agency, Drug Enforcement Agency (DEA), US Marshals, or other federal agencies, from January 2018 through March 2018
1. Describe or relate to any procedure or protocol for sharing information collected by the the Mayor of the City of Chicago or related operations with state and local authorities, including the Chicago Police Department, sheriff departments, local or county jails;
1. Describe or relate to any procedure or protocol for sharing information collected by state and local authorities for raids related operations between the Chicago Police Department and federal immigration agents;
1. Describe or relate to any procedure or protocol for sharing the information collected by Chicago Police Department, ICE agents for raids or related operations with federal agencies or with other sub-federal agencies or organizations.

With respect to the form of production, see 5 U.S.C. § 552(a)(3)(B), we request that responsive documents be provided electronically in text-searchable, static-image format (PDF), in the best image quality in the agencies' possession. We further request that reasonable metadata be transmitted along with responsive documents, including but not limited to email attachments, author and recipient information, date and time stamps, and the like.

Requesters

Requesters have done work in, or reside within the territorial jurisdiction of the City of Chicago. All requesters have expressed interest in or have worked on issues related to immigration enforcement or the protection of immigrants' rights.

Individual requester work or reside within the regions covered by the City of Chicago.

- Reyna Wences

The following organization is based in or work within the territorial jurisdiction of the City of Chicago.

- Organized Communities Against Deportations (OCAD) is a community based organization in Illinois that organizes against unfair and inhumane immigration enforcement practices that impact immigrant communi

Requesters respectfully request a waiver of fees in accordance with 5 U.S.C. § 552(a)(4)(A)(iii). That provision is to be "liberally construed in favor of waivers for noncommercial requesters." *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1312 (D.C. Cir. 2003). We do not have a commercial interest in this information.

Through this FOIA, we anticipate interested members of the public, particularly residents living within the jurisdiction of the Chicago Field Office will obtain important immigration-related information that will impact noncitizen residents, US citizens, and families. Both individuals and non-profit organizations

will plan distribution of written materials, including on our respective websites, and through public and educational appearances.

We seek the requested information for the purpose of disseminating it to members of the public who have access to their public websites and other free publications, and not for the purpose of commercial gain. In addition, 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.” 5 U.S.C. § 552(a)(4)(A)(iii); 6 C.F.R. § 5.11(k).

Disclosure of the requested information will contribute significantly to the public understanding of immigration raids or related operations because Organized Communities Against Deportations has the capacity and intent to disseminate widely the information to a broad audience. Both the organization and individual requesters will review and analyze the information obtained through this FOIA request. In addition, all requesters, individual and organizations, will speak publicly and publish written materials to be shared with the general public and organizational members and residents within the jurisdiction of the Chicago Field Office. All our organizations will make the information available through our respective websites, which are accessible by any member of the public. Finally, we often have frequent contact with national print and news media and plan to share information gleaned from FOIA disclosures with interested media. Disclosure of the requested information will shed light on aspects of processes of ICE and other agencies heretofore unknown to the public. Moreover, consistent with our missions and past practices, we intend, once we receive the information, to share it with fellow public-interest organizations as well as the public, in order to help protect the rights of immigrants, including ensuring that they receive legal representation.

If the fee-waiver request is denied, we are willing to pay fees up to a maximum of \$25. For reasons similar to those set out above, this request at least qualifies for substantially reduced fees. If you nevertheless estimate that the fees will exceed this limit, or if you have any questions regarding this request, please contact me, Reyna Wences at Organized Communities Against Deportations. I reserve the right, however, to challenge a denial of my fee-waiver request. See 5 U.S.C. § 552(a)(4)(A)(vii).

Thank you for your consideration of this request. We look forward to receiving your response within the 20-day period set by Congress. See *id.* § 552(a)(6)(A)(i).