



January 27, 2022

Via certified mail

City of Alvarado  
Attn: Paul DeBuff, City Manager  
104 West College  
Alvarado, Tx 76009

Re: Request for Information Under Tex. Gen. Laws § 552.001 *et seq.*  
ICE Detainees at the Prairieland Detention Facility

Dear Mr. DeBuff:

This is a request under Texas Public Information Law, Tex. Gen. Laws § 552.001 *et seq.*, for information relating to the City of Alvarado's (the "City") administration of an Intergovernmental Service Agreement ("IGSA") or Dedicated Intergovernmental Service Agreement ("DIGSA") with U.S. Immigration and Customs Enforcement ("ICE") for the detention of ICE detainees at the Prairieland Detention Facility (the "Detention Facility"). We understand the City contracted with LaSalle Corrections to operate the Detention Facility. Because the City is a governmental body under Tex. Gen. Law § 552.003(A) subject to the state's public information law, we request the following records:

- 1) Copies of the most recent IGSA or DIGSA, modification, or amendment between ICE and the City.
- 2) Copies of past IGSA's or DIGSA's between ICE and the City.
- 3) Copies of the most recent contract between the City and LaSalle Corrections for operation of the Detention Facility.
- 4) Copies of past contracts between the City and LaSalle Corrections for operation of the Detention Facility.
- 5) Communications between you or any other employee or representative of the City of Alvarado and ICE personnel regarding the City's contract with ICE.
- 6) Records<sup>1</sup> maintained by the City since the inception of the IGSA or DIGSA with ICE regarding detainees housed at the Detention Facility.

---

<sup>1</sup> For purposes of the Request, the term "records" includes but is not limited to all communications, correspondence, directives, documents, data, videotapes, audiotapes, e-mails, faxes, files, guidance, guidelines, standards, evaluations, instructions, analyses, memoranda, agreements, notes, orders, policies, procedures, protocols, reports, spreadsheets, charts, rules, manuals, technical specifications, training materials, and studies, including records kept in written form, or electronic format on computers and/or other electronic storage devices, electronic communications and/or videotapes, as well as any reproductions thereof that differ in any way from any other reproduction, such as copies containing marginal notations.

- 7) Copies of complaints filed with the City regarding individuals detained at the Detention Facility concerning substandard medical care, solitary confinement or segregation, physical or sexual abuse, use of force, chemical agents including pepper spray, rubber bullets or other forms of crowd control. For each complaint, please also provide the following biographic information for the complainant:
  - a) Race and ethnicity
  - b) Country of birth
  - c) Country of citizenship

We request that any records be provided electronically in a text-searchable, static-image format (PDF). Additionally, we request that you provide any data in a workable format, such Microsoft Excel or comma-separate values (CSV) files. If terms or codes are not in the form template and/or publicly defined, please provide a glossary or other descriptive records containing definitions of acronyms, numerical codes, or terms contained in data responsive to this request. We request that you produce responsive materials in their entirety, including all attachments, appendices, enclosures, and/or exhibits.

**Please respond to this request by February 16, 2022.** In case that is not possible, please respond in accordance with the procedures outlined in Tex. Gen. Law § 552.221(d).

Because requesters are non-profit organizations and the information requested will benefit the public, we also request a waiver of any fees associated with the request as allowed by Tex. Gen. Law § 552.267. If necessary, however, requesters will reimburse the City a copying cost not to exceed \$50.00. Please notify requesters if a response will exceed such amount.

We appreciate your prompt attention to this request. Please submit responsive documents via email at [rpinto@immcouncil.org](mailto:rpinto@immcouncil.org). If you have any questions regarding the request, please contact us at 202-507-7549.

Very truly yours,

/s/ Tsion Gurmu

Tsion Gurmu, Esq.  
Legal Manager  
Black Alliance for Just Immigration

/s/ Raul A. Pinto

Raul A. Pinto, Esq.  
Senior Staff Attorney  
American Immigration Council