



February 10, 2022

Via certified mail and email

Williamson County Attorney's Office
Attn: Public Information Requests
405 Martin Luther King Jr. St., Box 7
Georgetown, Texas 78626

Re: Request for Information Under Tex. Gen. Laws § 552.001 *et seq.*
ICE Detainees at the T. Don Hutto Residential Facility

Dear Public Information Officer:

This is a request under Texas Public Information Law, Tex. Gen. Laws § 552.001 *et seq.*, for information relating to Williamson County's (the "County") administration of an Intergovernmental Service Agreement ("IGSA") with U.S. Immigration and Customs Enforcement ("ICE") for the detention of ICE detainees at the T. Don Hutto Residential Facility (the "Detention Facility"). We understand that the County terminated its contract with ICE as of January 31, 2019. However, this request seeks information prior to the termination of said contract. Because the County 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 modifications or amendments agreed upon by ICE and the County subsequent to the January 27, 2010 IGSA entered into by the parties.
- 2) Communications between you or any other employee or representative of the County and ICE personnel regarding the IGSA with ICE between 2010 and 2019.
- 3) Copies of the contract between the County and CoreCivic for operation of the Detention Facility.
- 4) Records¹ maintained by the County regarding detainees housed at the Detention Facility between 2010 and 2019.
- 5) Copies of complaints filed with the County 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

¹ 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.

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 March 3, 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 County 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. 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