



January 27, 2022

Via certified mail

Hudspeth County Sheriff's Office
Attn: Sheriff Arvin West
P.O. Box 39
Sierra Blanca, TX 79851

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

Dear Sheriff West:

This is a request under Texas Public Information Law, Tex. Gen. Laws § 552.001 *et seq.* for information relating to the Hudspeth County Sheriff's Office ("HCSO") administration of an Intergovernmental Service Agreement ("IGSA") with U.S. Marshall Services for the detention of ICE detainees at the West Texas Detention Facility (the "Detention Facility"). We understand the HCSO contracted with LaSalle Corrections to operate the Detention Facility. Because the HCSO is a public body under Texas law subject to the state's public information law, we request the following records:

- 1) Copies of the most recent IGSA, modification, or amendment between the U.S. Marshall Services and the HCSO.
- 2) Copies of past IGSA's between the U.S. Marshall Services and the HCSO.
- 3) Copies of the most recent contract between the HCSO and LaSalle Corrections for operation of the Detention Facility.
- 4) Copies of past contracts between the HCSO and LaSalle Corrections for operation of the Detention Facility.
- 5) Communications between the Hudspeth County Sheriff or any other HCSO officer and ICE personnel regarding the HCSO's contract with the U.S. Marshall Services' housing of ICE detainees.
- 6) Records¹ maintained by the HCSO since the inception of the IGSA regarding ICE detainees housed at the Detention Facility, including communications between HCSO personnel and the U.S. Marshall Services, ICE, or LaSalle Corrections.

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.

- 7) Records maintained by the HCSO regarding calls for service received by the HCSO from the Detention Facility.
- 8) Copies of complaints filed with the HCSO 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-separated 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 HCSO 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