



January 27, 2022

Via certified mail

Jackson Parish Sheriff's Office
Attn: Sheriff Andy Brown
500 East Court Street, Room 100
Jonesboro, LA 71251

Re: Request for Information Under Louisiana La.R.S. 44:1 *et seq.*
ICE Detainees at Jackson Parish Correctional Center

Dear Sheriff Brown:

This is a request under Louisiana Open Records Law, La. R.S. § 44:1 *et seq.* for information relating to the Jackson Parish Sheriff's Office (the "JPSO") administration of an Intergovernmental Service Agreement ("IGSA") with U.S. Immigration and Customs Enforcement ("ICE") for the detention of ICE detainees at the Jackson Parish Correctional Center (the "Correctional Center"). While the facility is owned and operated by LaSalle Corrections, we understand the JPSO contracts with LaSalle Management to provide detention services at the Correctional Center. Because the JPSO is a public body under Louisiana law subject to the state's public records law, we request the following records:

- 1) Copies of the most recent IGSA, modification or amendment between ICE and the JPSO.
- 2) Copies of past IGSA's between ICE and the JPSO.
- 3) Copies of the most recent contract between the JPSO and LaSalle Corrections for operation of the Correctional Center.
- 4) Copies of past contracts between the JPSO and LaSalle Corrections for operation of the Correctional Center.
- 5) Communications between the Sheriff of Jackson Parish or any other JPSO officer and ICE personnel regarding the JPSO's entering into and renewing of the IGSA with ICE.
- 6) Records¹ maintained by the JPSO regarding calls for service received by the JPSO from the Correctional Center.

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 JPSO since October 1, 2015, regarding detainees housed at the Correctional Center under the terms of the IGSA, including communications between the Jackson Parish Sheriff or any other JPSO officer and ICE personnel or employees of LaSalle management.
- 8) Copies of complaints filed with the JPSO regarding individuals detained at the Correctional Center 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. If any of the records requested are not available, please indicate the reason in writing. If there is a question regarding whether any part of the request is not a public record, we ask that you please notify us within three business days of receipt of this request in accordance with La. R.S. § 44:32.

Because requesters are non-profit organizations, we also request a waiver of any fees associated with the request. If necessary, however, requesters will reimburse the JPSO 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