



January 27, 2022

Via certified mail

Ms. Cynthia F. Cockerham, Ed.D.  
LaSalle Economic Development District  
P.O. Box 775  
Jena, LA 71342

Re: Request for Information Under Louisiana La.R.S. 44:1 *et seq.*  
ICE Detainees at LaSalle Detention Facility

Dear Dr. Cockerham:

This is a request under Louisiana Open Records Law, La. R.S. § 44:1 *et seq.* for information relating to the LaSalle Economic Development District's (the "LEDD") administration of an Intergovernmental Service Agreement ("IGSA") or Designated Intergovernmental Service Agreement ("DIGSA") with U.S. Immigration and Customs Enforcement ("ICE") for the detention of ICE detainees at the LaSalle Detention Facility (the "Detention Facility"). We understand the LEDD contracted with the GEO Group, Inc. to operate the Detention Facility. Because the LEDD 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 or DIGSA, modification, or amendment between ICE and the LEDD.
- 2) Copies of past IGSA's or DIGSA's between ICE and the LEDD.
- 3) Copies of the most recent contract between the LEDD and the GEO Group, Inc. for operation of the Detention Facility.
- 4) Copies of past contracts between the LEDD and the GEO Group, Inc. for operation of the Detention Facility.
- 5) Communications between you, a member of the LEDD Board of Directors, or any other LEDD staff or representative and ICE personnel regarding LEDD's contract with ICE.
- 6) Records<sup>1</sup> maintained by the LEDD since the inception of the IGSA or DIGSA with ICE regarding detainees housed at the Detention Facility.

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<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 LEDD regarding individuals detained at the Detention Facility regarding 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 LEDD 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