



February 10, 2022

Via certified mail

Williamson County Sheriff's Office
508 South Rock Street
Georgetown, TX 78626

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

Dear Sheriff Gleason:

This is a request under Texas Public Information Law, Tex. Gen. Laws § 552.001 *et seq.* for information relating to the Williamson County Sheriff's Office ("WCSO") rendering of services to CoreCivic at the T. Don Hutto Residential Facility (the "Detention Facility"). Enclosed please find the Open Records Request Form. We understand the WCSO contracted with CoreCivic to provide certain oversight services at the Detention Facility. Because the WCSO is a public body under Texas law subject to the state's public information law, we request the following records:

- 1) Copies of contracts between the WCSO and CoreCivic.
- 2) Records¹ maintained by the WCSO regarding ICE detainees housed at the Detention Facility, including communications between WCSO personnel and ICE officers or CoreCivic employees, as well as reports prepared by WCSO relating to the Detention Facility or detainees housed therein.
- 3) Copies of complaints filed with the WCSO 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

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.

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 WCSO 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