



October 4, 2018

Sheriff Scott Cass
Lamar County Sheriff's Office
125 Brown Avenue
Paris, TX 75460

By Email: sheriffscottcass@co.lamar.tx.us

RE: Request for Public Information

Dear Sheriff Cass:

This letter is sent by the ACLU Foundation of Texas (“ACLU”) and the Immigrant Legal Resource Center (“ILRC”) on behalf of a number of community members from Lamar County, Texas, who have contacted us to raise concerns about a raid by agents of U.S. Immigration & Customs Enforcement (“ICE”) and other law enforcement personnel at the premises of Load Trail in Sumner, Texas, on August 28, 2018 (the “Sumner Raid”),¹ as well as other alleged immigration enforcement actions in Lamar County.

In light of those concerns, we write to seek public information relating to these immigration enforcement actions from the Lamar County Sheriff's Office (LCSO) pursuant to the Texas Public Information Act, TEX. GOV'T CODE Ch. 552. In particular, we request the following public information, recorded in any medium and existing in any form, in the possession or control of LCSO, or its officers or employees:

1. Records concerning any involvement by LCSO, or its officers or employees, in the Sumner Raid.
2. Records concerning any request for assistance from ICE concerning the Sumner Raid.

¹ The raid was described in ICE's news release entitled *ICE executes federal criminal search warrants in North Texas*, dated August 28, 2018, and available online at <https://www.ice.gov/news/releases/ice-executes-federal-criminal-search-warrants-north-texas>.

AMERICAN CIVIL LIBERTIES UNION FOUNDATION OF TEXAS

P.O. BOX 8306
HOUSTON, TX 77288
713.942.8146 | WWW.ACLUTX.ORG
WITH OFFICES IN AUSTIN, BROWNSVILLE, DALLAS AND EL PASO

3. Records recording or evidencing any agreement² between Lamar County, or Lamar County Sheriff Scott Cass, or LCSO, or any of LCSO's officers or employees, and:
 - (a) ICE; or
 - (b) U.S. Department of Homeland Security (or any agency, division or component thereof),concerning the enforcement of any federal or state laws.
4. Records recording or concerning any communications between LCSO, or any of LCSO's officers or employees, and ICE, or any of ICE's officers or employees, in the period from April 1, 2018, to September 14, 2018.
5. Records of any budgets, expenditures, or staffing allocations related to assisting ICE or otherwise relating to the enforcement of any federal or state laws relating to immigration.
7. Records of any applications for funding or equipment requests related to assisting ICE or otherwise relating to the enforcement of any federal or state laws relating to immigration.
8. Plans, instructions, or memos issued or presented to LCSO officers or employees, related to assisting ICE or otherwise relating to the enforcement of any federal or state laws relating to immigration.
9. Records of names, addresses, or other contact information of any individuals in Lamar County that LCSO shared with ICE in the period from April 1, 2018, to September 14, 2018.
10. Records recording or evidencing any databases or systems maintained by LCSO to which ICE has access.
11. Records recording or evidencing any door-knocking, raids, or investigations by LCSO, or any of LCSO's officers or employees, relating to the enforcement of any federal or state laws relating to immigration.

In the interest of open government, please be mindful of your duty to make a good-faith effort to relate these requests to any information that LCSO, or any of its officers or employees, holds or controls. Open Records Dec. No. 561 at 8 (1990). We also ask that, in accordance with the law, you promptly produce the records we have requested. If you expect that fulfilling this request will take longer than ten days, please inform us when we can expect to receive the records.

We also ask that, in accordance with the law, you promptly produce the records we have requested. The Public Information Act mandates that if you are unable to produce the requested records within 10 business days of this request, you certify that fact in writing and set a date

² Whether under Section 287(g) of the Immigration and Nationality Act (INA), codified at 8 U.S.C. § 1357(g) (1996), or otherwise.

within a reasonable time when the information will be available. Should you elect to withhold, redact or delete any public information, please justify your decision by referencing specific exemptions available under the Public Information Act. Of course, we reserve the right to appeal should you determine to withhold, redact or delete any information sought in this request.

Please waive the fees for this request, as it is made for public and non-commercial purposes. TEX. GOV'T CODE § 552.267. The ACLU is a nonprofit organization, and its mission is to defend and preserve the individual rights and liberties guaranteed to every person in this country by the Constitution and laws of the United States. The ILRC is also a nonprofit organization, and its mission is to work with and educate immigrants, community organizations, and the legal sector to continue to build a democratic society that values diversity and the rights of all people. This request is made to gather and disseminate information that is likely to contribute significantly to the public understanding of executive branch operations and activities, and providing a copy of the requested records will benefit the general public.

We prefer to receive these records electronically. Please send your response by email to mmccarthy@aclutx.org or, if the records cannot be sent electronically, by post to the ACLU Foundation of Texas, Attn: M. McCarthy, P.O. Box 8306, Houston, Texas 77288-8306.

Please do not hesitate to contact Matthew McCarthy of the ACLU if you have any questions or concerns, by email at mmccarthy@aclutx.org or by telephone at (713) 942-8146 (ext. 131).

Thank you for your assistance in this matter.

Sincerely,



Edgar Saldivar
ACLU Foundation of Texas



Matthew McCarthy
ACLU Foundation of Texas



Lena Graber
Immigrant Legal Resource Center