



Institute for the Elimination of Poverty & Genocide

September 3, 2026

FOIA Officer
U.S. Immigration and Customs Enforcement
Freedom of Information Act Office
500 12th Street, S.W., Stop 5009
Washington, D.C. 20536-5009

Re: Request for Records pertaining to conditions at Stewart Detention Center

Dear Freedom of Information Officer,

This letter constitutes a request (“Request”) pursuant to the Freedom of Information Act, 5 U.S.C. §552 (“FOIA”) and Department of Homeland Security (“DHS”) regulations. The Request is submitted by Citizens for Responsibility and Ethics in Washington (“CREW”), Project South, and El Refugio.

I. Records Requested

CREW, Project South and El Refugio request all the following records:

1. From January 2006 to the date the search is conducted, Immigration Customs Enforcement’s (ICE) Quality Assurance Surveillance Plans, including Performance Requirements Summary and Contract discrepancy process, for Stewart Detention Center (SDC).
2. From January 2006 to the date the search is conducted, all records identifying deficiencies or performance requirements at Stewart Detention Center that resulted in, or were considered for, a Contract Discrepancy Report, invoice deduction, monetary withholding, or other contractual remedy at Stewart Detention Center.
3. From January 2026 to the date the search is conducted, any grievances or complaints made by detained immigrants at SDC that ICE has access to, and any grievance/complaint responses and appeal records, according to PBNDS 2.13.VB and 3.1.VF-G.¹
4. From January 2026 to the date the search is conducted, any internal reports or recommendations made regarding SDC in 2026 arising from detained immigrant grievances and complaints in item 3.
5. From January 2025 to the date the search is conducted, any inspection reports, deficiency findings, or corrective action plans regarding SDC.

¹ U.S. Immigration & Customs Enforcement, *Performance-Based National Detention Standards 2011* (rev. Dec. 2016), <https://www.ice.gov/doclib/detention-standards/2011/pbnds2011r2016.pdf>.

6. From January 1, 2025 to May 1, 2026, any audits of ICE Health Service Corps (IHSC) and IHSC contractors, any deficiency reports, and any corrective action plans relating to suicide prevention and use of force protocols at SDC.
7. Records of any ICE External Reviews and Analysis Unit investigation or other ICE investigation into the death of Jean Carlos Jimenez-Joseph, who died at SDC in 2017, and any ICE response including:
 - a. any Corrective Action Plan, Contract Discrepancy Report, or contract modification issued to CoreCivic or the ERO Atlanta Field Office as a result of the review;
 - b. records tracking the implementation, verification, or closure of each recommendation in the review; and
 - c. any referral arising from the review's findings of falsified records, deviation from medical care procedures, or improper use of disciplinary segregation — to the DHS OIG, ICE OPR, or any U.S. Attorney's Office — and the disposition of any such referral.
 - d. any disciplinary, administrative, or corrective action taken against any ICE officer, employee, contractor, or other SDC staff member arising from, related to, or resulting from the death of Jean Carlos Jimenez-Joseph.
8. Records sufficient to show ICE's response to the ICE External Reviews and Analysis Unit's October 20, 2021 Detainee Death Review concerning Efraín Romero De La Rosa, who died at SDC in 2018, including:
 - a. any Corrective Action Plan, Contract Discrepancy Report, or contract modification issued to CoreCivic or the ERO Atlanta Field Office as a result of the review;
 - b. records tracking the implementation, verification, or closure of each recommendation in the review; and
 - c. any referral arising from the review's findings of falsified records, deviation from medical care procedures, or improper use of disciplinary segregation — to the DHS OIG, ICE OPR, or any U.S. Attorney's Office — and the disposition of any such referral.
 - d. any disciplinary, administrative, or corrective action taken against any ICE officer, employee, contractor, or other SDC staff member arising from, related to, or resulting from the death of Efraín Romero De La Rosa.
9. Records of any ICE External Reviews and Analysis Unit investigation or other ICE investigation into the death of Jesus Molina Veya, who died at SDC in 2025 and any ICE response including:
 - a. any Corrective Action Plan, Contract Discrepancy Report, or contract modification issued to CoreCivic or the ERO Atlanta Field Office as a result of the review;
 - b. records tracking the implementation, verification, or closure of each recommendation in the review; and
 - c. any referral arising from the review's findings of falsified records, deviation from medical care procedures, or improper use of disciplinary segregation — to the DHS OIG, ICE OPR, or any U.S. Attorney's Office — and the disposition of any such referral.
 - d. any disciplinary, administrative, or corrective action taken against any ICE officer, employee, contractor, or other SDC staff member arising from, related to, or resulting from the death of Jesus Molina Veya.
10. From March 2025 to the date the search is conducted, all policies, post orders, and standard operating procedures, pertaining to use of force or suicide prevention, in effect at SDC.
11. From January 1, 2026 to the date the search is conducted, all records of use of force incidents at SDC. This includes but is not limited to audio & visual recordings, written use-of-force reports, use of force forms, medical examinations for detained immigrants and involved staff members, any after-action team review reports, notifications and memoranda of inappropriate use of force,

incident reports, investigation reports, report of findings to the Field Office Director (FOD), and any referrals of incidents to the DHS Office of Professional Responsibility (OPR) , DHS, OIG or the Federal Bureau of Investigations (FBI), as required by PBNDS 2.15.V.O-P; as well as any staff-on-detained-immigrant notification records to the FOD, results of staff-on-detained-immigrant assault investigations, and notifications of staff misconduct as required by PBNDS 2.4.V.H-I.

12. From January 1, 2024 to the date the search is conducted, all records regarding suicides and attempted suicides at SDC including but not limited to incident reports, medical response, emergency response, or other intervention following each incident.
13. From January 1, 2024 to the date the search is conducted, all policies, post orders, and standard operating procedures, pertaining to the care of pregnant people, in effect at SDC.
14. From January 1, 2024 to the date the search is conducted, all records of complaints, grievances, incident reports, investigations, or reviews concerning the treatment or medical care of pregnant individuals at SDC.
15. From January 1, 2024 to the date the search is conducted, all records pertaining to the number of pregnant people detained at SDC.
16. From January 1, 2024 to the date the search is conducted, all records concerning pregnancy-related medical emergencies, complications, miscarriages, stillbirths, or other adverse pregnancy outcomes involving individuals detained at SDC.
17. From January 2026 to the date the search is conducted, all records relating to charging detained immigrants at SDC in order to receive medical care and/or treatment including medication.
18. From January 1, 2026 to the date the search is conducted, all written segregation orders, review of segregation cases, required notifications to the Field Office Director of detained immigrants in segregation, permanent SMU logs, visitors logs, and SMU records for each segregation unit, as required by PBNDS 2.12.V.B-E.
19. From April 26, 2026 to the date the search is conducted, all records which identify any SDC officer or staff member placed on administrative leave, reassigned, or removed from contact with detained immigrants and why, including written notifications to the Field Office Director.
20. From June 2026 to the date the search is conducted, all records identifying any tents, temporary structures, trailers, buildings, rooms, outdoor areas, or other spaces used or proposed for use to house, hold, process, stage, or otherwise accommodate detained individuals outside the facility's ordinary permanent housing units at SDC.
21. From June 2026 to the date the search is conducted, records identifying the capacity of each temporary or nontraditional space at SDC mentioned in item 20, including its intended or authorized occupancy, actual occupancy, dates of use, and the population housed or held there.
22. From June 2026 to the date the search is conducted, records concerning the conditions, standards, or requirements applicable to such spaces at SDC mentioned in item 20, including heating, cooling, ventilation, sanitation, water, electricity, toilets, showers, sleeping arrangements, fire safety, emergency exits, medical access, food service, and security.

23. From June 2026 to the date the search is conducted, records identifying the types of sleeping surfaces provided to detained immigrants at SDC, including but not limited to:
 - a. Standard beds or bed frames;
 - b. Metal or bunk-style beds;
 - c. Cots or portable beds;
 - d. Folding or temporary cots;
 - e. Mattresses placed directly on floors;
 - f. Inflatable mattresses, air mattresses, or inflatable sleeping surfaces;
 - g. Foam sleeping pads or mats;
 - h. Any other temporary, emergency, or non-standard sleeping surfaces.
24. From June 2026 to the date the search is conducted, records identifying where temporary or non-standard sleeping arrangements have been used at SDC, including records indicating the dates or periods of such use and the number of detained immigrants affected, where available.
25. From June 2026 to the date the search is conducted, inspection reports, monitoring reports, facility assessments, incident reports, complaints, or correspondence concerning inadequate beds, insufficient sleeping capacity, overcrowding, detained immigrants sleeping on floors, use of cots or inflatable mattresses, or other temporary sleeping arrangements at SDC.
26. From June 2026 to the date the search is conducted, records sufficient to show the number of beds or other sleeping spaces available versus the number of detained immigrants housed at SDC during any period in which temporary sleeping arrangements were used.

The above request excludes agency records consisting solely of news articles, press clippings, and other publicly-available material, so long as the records include no accompanying discussion by agency officials.

Please search for responsive records regardless of format, medium, or physical characteristics. We seek records of any kind, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical material. Our request includes without limitation all correspondence, letters, emails, text messages, facsimiles, telephone messages, voice mail messages, and transcripts, notes, or minutes of any meetings, telephone conversations, or discussions. Our request also includes any attachments to emails and other records, and anyone who was cc'ed or bcc'ed on any emails. The term "records" includes all records or communications preserved in electronic or written form, including but not limited to correspondence, documents, data, videotapes, audio tapes, photographs, faxes, files, guidance, guidelines, evaluations, instructions, analyses, memoranda, agreements, notes, orders, policies, procedures, protocols, reports, rules, technical manuals, technical specifications, training manuals, or studies.

For any assertion of withholding, we request that each withheld document be particularly identified along with the basis for the withholding so that they have sufficient information to understand the reasoning for the withholding. Furthermore, in case of an appeal, the U.S. Department of Justice Office of Information Policy can use this information to determine whether the particular withholding is justified. There is a statutory duty to produce "[a]ny reasonably segregable portion of a record ... after deletion of the portions which are exempt." See 5 U.S.C. § 552(b). Withholding entire documents because they contain some exempt material violates this statutory duty. See *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 260 (D.C. Cir. 1977) ("The focus of the FOIA is information, not documents, and an agency cannot justify withholding an entire document simply by showing that it contains some exempt material.").

Please be advised that we intend to pursue all legal remedies to enforce its rights under FOIA. Accordingly, because litigation is reasonably foreseeable, the agency should institute an agencywide preservation hold on all documents potentially responsive to this request.

II. Request for Expedited Processing

We request Track 1 expedited treatment for this FOIA request pursuant to 6 C.F.R. § 5.5(e) and 5 U.S.C. § 552(a)(6)(E).²

According to the FOIA statute, requests that demonstrate “a compelling need” or “in other cases determined by the agency” qualify for expedited processing.³ “Compelling need,” as defined by the statute, means “(I) that a failure to obtain requested records on an expedited basis ... could reasonably be expected to pose an imminent threat to the life or physical safety of an individual; or (II) with respect to a request made by a person primarily engaged in disseminating information, urgency to inform the public concerning actual or alleged Federal Government activity.”⁴

In this case, there is a compelling need for the information requested because the information is requested by an organization primarily engaged in disseminating information and there is an urgency to inform the public concerning actual or alleged Federal Government activity.

A. Failure to Obtain Requested Records on an Expedited Basis could reasonably be expected to pose an imminent threat to the life or physical safety of an individual

Two-hundred and ninety people have died in ICE custody since 2003, and Stewart Detention Center is the second-deadliest ICE facility, reporting 15 deaths between 2003 and April 28, 2026.⁵ Furthermore, the number of deaths, including the number of deaths reported as suicide, are dramatically increasing. Deaths in detention have tripled from 2024 to 2025, and the number of suicides in the first half of 2026 is higher than the total number in any year in the last two decades.⁶ Journalists reviewing detention data, ICE death reports, medical records, and court cases have linked the surge in deaths to medical delays and neglect.⁷ Formal reports have previously highlighted the same conditions that have led to deaths. These reports include the aforementioned DHS OIG report detailing its concerns regarding treatment and care of immigrants detained by ICE,⁸ a May 2017 report “examin[ing] serious lapses in health care that have led to severe suffering and at times the preventable or premature death of individuals held in immigration detention facilities,”⁹ and a February 2016 report concluding that “failure to provide adequate medical care has continued to result in unnecessary deaths.”¹⁰ Lapses in the care provided to detained immigrants, including medical care, and conditions leading to deaths in detention, are of grave concern to the public.

² See also 6 C.F.R. § 5.5(e)(1).

³ 5 U.S.C. § 552(a)(6)(E)(i)(I).

⁴ 5 U.S.C. § 552(a)(6)(E)(v).

⁵ UCLA Law Behind Bars Data Project, *ICE Deaths in Custody*, <https://uclaprisondata.org/ice-deaths-in-custody> (last updated May 2026).

⁶ Justin Goldman, Laura Strickler, Julia Ainsley & Helen Graham, *Suicides Rise in ICE Detention, 911 Calls Detail Serious Cases of Self-Harm*, NBC News (May 21, 2026, 9:00 PM ET), <https://www.nbcnews.com/politics/immigration/suicides-rise-ice-detention-911-calls-detail-serious-cases-self-harm-rcna344333>.

⁷ See Rae Ellen Bichell, Claire Galofaro, Maia Rosenfeld, Renuka Rayasam, Aaron Kessler & Byron Tau, *From Festering Infections to Untreated Cancer, ICE Detainees Across the US Describe Medical Neglect*, Associated Press (June 2, 2026), <https://apnews.com/article/ice-immigration-detention-medical-neglect-dhs-32c3fbee0c44dfb02fcab890b2c9a96> and St. John BARNED-SMITH & KO LYN CHEANG, *Inside ICE Detention Centers, Medical Misdiagnoses and Delays Prove Deadly*, S.F. Chron. (Apr. 9, 2026), <https://www.sfchronicle.com/projects/2026/ice-detention-deaths/>.

⁸ U.S. Dep’t of Homeland Security Office of Inspector General, *supra* note 6.

⁹ Human Rights Watch, CIVIC, *Systemic Indifference: Dangerous & Substandard Medical Care in US Immigration Detention*, at 1 (May 2017), https://www.hrw.org/sites/default/files/report_pdf/usimmigration0517_web_0.pdf.

¹⁰ ACLU, DWN, NIJC, *Fatal Neglect: How ICE Ignores Deaths in Detention*, at 2 (Feb. 2016), <https://www.detentionwatchnetwork.org/sites/default/files/reports/Fatal%20Neglect%20ACLU-DWN-NIJC.pdf>.

The treatment of detained immigrants in Georgia is particularly severe. The conditions at SDC, one of the deadliest ICE facility, have received special attention and censure from the above-referenced DHS OIG report,¹¹ as well as from lawmakers.¹² In addition, a 2021 review by ICE’s External Reviews and Analysis Unit found that staff at SDC had falsified documents, broken medical care procedures, and improperly used disciplinary solitary confinement for a previous detained immigrant who died by suicide at SDC in 2018.¹³ The inhumane treatment and conditions in these facilities have also been the focus of a publicly disseminated report by Project South that was released in May 2017.¹⁴

By knowing and understanding the problems, ICE and other government officials can prevent any more deaths from occurring in ICE custody and ensure the physical safety of detained immigrants. Without this information, the lives of detained immigrants in ICE custody in the state of Georgia are imminently at risk.

B. The Information Is Requested by an Organization Primarily Engaged in Disseminating Information and the Records Sought Are Urgently Needed to Inform the Public about Actual or Alleged Federal Government Activity

i. CREW and Project South are primarily engaged in disseminating information in order to inform the public about actual or alleged government activity.

CREW and Project South request expedited processing of this request, pursuant to 5 U.S.C. § 552(a)(6)(E). CREW is entitled to expedited processing because there is “[a]n urgency to inform the public about an actual or alleged Federal Government activity.” *Id.* § 552(a)(6)(E)(v)(II).

CREW is “primarily engaged in disseminating information” to the public, as most recently confirmed by the Court in *Citizens for Responsibility and Ethics in Washington v. U.S. Department of Justice* (“CREW v. DOJ”), No. 25-4426, 2026 WL 472589, at *10 (D.D.C. Feb. 19, 2026). This “standard ‘requires that information dissemination be the main [and not merely an incidental] activity of the requestor,’” but “publishing information ‘need not be [the organization’s] sole occupation.’” *Protect Democracy Project, Inc. v. U.S. Dep’t of Def.*, 263 F. Supp. 3d 293, 298 (D.D.C. 2017). CREW routinely disseminates information obtained through FOIA to the public in several ways. For example, CREW’s website receives hundreds of thousands of page views every month. The website includes blogposts that report on and analyze newsworthy developments regarding government ethics, corruption, and money in politics, as well as numerous reports CREW has published to educate the public about these issues. These reports frequently rely on government records obtained through FOIA. CREW also posts the documents it obtains through FOIA on its website. CREW is a credible requestor and disseminator of information often relied on by major media outlets.¹⁵

¹¹ See discussion and excerpts, *supra* note 5.

¹² Letter to Sec. Kristi Noem, *supra* note 8.

¹³ U.S. Immigration & Customs Enforcement, External Reviews & Analysis Unit, Detainee Death Review: Efrain De La Rosa (Oct. 20, 2021), <https://s3.documentcloud.org/documents/21089425/ice-internal-detainee-death-review-for-efrain-romero-de-la-rosa.pdf>, and summary reporting in Jose Olivares, *ICE Review of Immigrant’s Suicide Finds Falsified Documents, Neglect, and Improper Confinement*, *The Intercept* (Oct. 23, 2021), <https://theintercept.com/2021/10/23/ice-review-neglect-stewart-suicide-corecivic/>.

¹⁴ PROJECT SOUTH, IMPRISONED JUSTICE: INSIDE TWO GEORGIA IMMIGRANT DETENTION CENTERS (May 2017), https://projectsouth.org/wp-content/uploads/2017/06/Imprisoned_Justice_Report-1.pdf (describing conditions of two detention centers in the state of Georgia: The Stewart Detention Center and the Irwin County Detention Center).

¹⁵ See, e.g., *Citizens for Responsibility and Ethics in Washington*, *N.Y. Times*, <https://perma.cc/VT6X-DPJM> (last visited Mar. 2, 2026) (list of New York Times articles referencing CREW spanning over a decade); Ed Pilkington & Dharna Noor, *Top US Ethics Watchdog Investigating Trump Over Dinner with Oil Bosses*, *The Guardian* (May 15, 2024), <https://perma.cc/G7T5-T6AV> (referring to CREW as “Top US ethics watchdog”).

Project South is “primarily engaged in dissemination of information” pursuant to 5 U.S.C. § 552(a)(6)(E)(v)(II).¹⁶ Obtaining information about government activity, analyzing that information, and widely publishing and disseminating that information to the press and public are critical and substantial components of Project South’s work and are among its primary activities.¹⁷

Project South is dedicated to the realization and defense of human rights and social justice. Dissemination of information to the public at large, and to impacted communities in particular, a critical and substantial component of Project South’s mission and work.

ii. The records sought are urgently needed to inform the public about actual or alleged government activity.

These records are urgently needed to inform the public about actual or alleged government activity. *See* 5 U.S.C. § 552(a)(6)(E)(v)(II).¹⁸ Specifically, the requested records seek to inform the public about ICE’s activities in general related to the conditions, protocols, and procedures of detaining immigrants.

In addition, Project South and El Refugio have received reports from other immigrants detained at SDC and their visitors alleging serious deficiencies in conditions at the facility, including: inadequate medical care, lack of access to interpreters in the medical department, improper use of confinement in segregation, insufficient education and recreation programs, and exorbitant prices for commissary items that constitute basic, hygienic necessities. Such accounts have been corroborated by an investigation undertaken by the Office of Inspector General (OIG) in the U.S. Department of Homeland Security (DHS).¹⁹ In 2025, El Refugio further documented systemic medical neglect based on two research reports and their fifteen years of visitation, support and advocacy for detained immigrants at Stewart Detention Center.²⁰ These conditions led 20 members of Congress to request the release of a detained immigrant experiencing medical neglect from SDC in February 2026.²¹

C. This request concerns a matter of widespread and exceptional media interest in which there exist possible questions about the government’s integrity that affect Public confidence

DHS regulations provide an independent basis for expedited processing whenever a request involves “[a] matter of widespread and exceptional media interest in which there exist possible questions about the government’s integrity which affect public confidence.” 6 C.F.R. § 5.5(e)(1)(iv).

¹⁶ See also 6 C.F.R. § 5.5(d)(1)(ii) (expedited processing is warranted where there is “[a]n urgency to inform the public about an actual or alleged federal government activity.”)

¹⁷ Courts have found organizations that engage in information dissemination activities similar to Project South are “primarily engaged in disseminating information.” See, e.g., *Leadership Conference on Civil Rights v. Gonzales*, 404 F. Supp. 2d 246, 260 (D.D.C. 2005); *ACLU v. U.S. Dep’t of Justice*, 321 F. Supp. 2d 24, 29 n.5 (D.D.C. 2004) (finding non-profit public interest group that “gathers information of potential interest to a segment of the public, uses its editorial skills to turn the raw material into a distinct work, and distributes that work to an audience” to be “primarily engaged in disseminating information”); *Elec. Privacy Info. Ctr. v. U.S. Dep’t of Defense*, 241 F. Supp. 2d 5, 11 (D.D.C. 2003).

¹⁸ See also 6 C.F.R. § 5.5(e)(1)(ii).

¹⁹ U.S. Dep’t of Homeland Security Office of Inspector General, *Concerns about ICE Detainee Treatment and Care at Detention Facilities* (Dec. 11, 2017), <https://www.oig.dhs.gov/sites/default/files/assets/2017-12/OIG-18-32-Dec17.pdf> (finding “long waits for the provision of medical care, including instances of detainee[d immigrant]s with painful conditions,” unhygienic conditions, lack of sanitary supplies, and “an inconsistent and insufficiently documented grievance resolution process” at Facility, as well as “language barriers [that] prevented detainee[d immigrant]s from understanding medical staff” generally).

²⁰ El Refugio, *Medical Neglect and Abuse in Stewart Detention Center: Historic Failures and Trump-Era Overcrowding before ICE Funding Increase* (July 24, 2025), https://static1.squarespace.com/static/5dedd42f60df274331bcd16b/t/689f686416e7065ca756cda7/1755277412984/SDC_Report_El+Refugio_07-21-2015.pdf (finding “inside SDC, people are regularly and systematically denied access to the most basic forms of health care and subjected to conditions that cause lasting harm.”).

²¹ Letter to Sec. Kristi Noem & Acting Dir. Todd M. Lyons from Rep. Pramila Jayapal et al. (Feb. 17, 2026), <https://jayapal.house.gov/wp-content/uploads/2026/02/Rodney-Taylor-Final-Ltr-2.17.26.pdf>.

ICE's treatment for people in its custody at Stewart Detention Center, and the accuracy and completeness of ICE's public representations about the conditions in which immigrants are subjected to is a matter of widespread and exceptional media interest involving the government's integrity. Every category of records requested above bears directly on that matter. Lawmakers have recently raised concerns regarding the conditions at Stewart Detention Center and thus Stewart Detention Center has garnered a lot of media attention.²²

Pursuant to 6 C.F.R. § 5.5(e)(3), the undersigned certifies that the information provided above as the basis for requesting expedited processing is true to the best of her knowledge and belief.

If this request is denied in whole or part, we ask that all denials are justified by reference to specific exemptions of the FOIA. We expect the release of all segregable portions of otherwise exempt material. We also reserves the right to appeal a decision to withhold any information or a decision to deny expedited processing. We look forward to a reply to the request for expedited processing within ten (10) business days, as required under 5 U.S.C. § 552(a)(6)(E)(ii)(I). Notwithstanding a decision on the matter of expedited processing, we look forward to a reply to the records request within twenty (20) business days, as required under 5 U.S.C. § 552(a)(6)(A)(i).

III. Request for Fee Waiver

Finally, in accordance with 5 U.S.C. § 552(a)(4)(A) and agency regulations, we request that you waive any and all fees and costs associated with processing this request. The subject of this request concerns the operations of the federal government, and the disclosures likely will contribute to a better understanding of relevant government procedures by in a significant way. *See id.* § 552(a)(4)(A)(iii). Moreover, the request primarily and fundamentally is for non-commercial purposes. *See, e.g., McClellan Ecological v. Carlucci*, 835 F.2d 1282, 1285 (9th Cir. 1987).

As stated above, *supra* II.B.i, CREW and Project South are primarily engaged in disseminating information in order to inform the public about actual or alleged government activity. We request that we not be charged search or review fees for this request pursuant to 5 U.S.C. § 552(a)(4)(A)(ii)(II) because we qualify as a members of the news media. *See Nat'l Sec. Archive v. U.S. Dep't of Defense*, 880 F.2d 1381, 1386 (D.C. Cir. 1989) (holding non-profit a "representative of the news media" and broadly interpreting the term to include "any person or organization which regularly publishes or disseminates information to the public").

Under these circumstances, Project South and CREW satisfy fully the criteria for a fee waiver. If the request for a fee waiver is denied, please contact us immediately upon making such a determination.

Please contact Priyanka Bhatt at [REDACTED] or [REDACTED] org, should you wish to discuss this request. Thank you for your prompt attention to this matter.

Sincerely,

Priyanka Bhatt
Senior Staff Attorney
Project South

Kayvan Farchadi
Senior Counsel
Citizens for Responsibility and Ethics in Washington

²² Maya Homan, *Democratic Lawmakers Call for Closure of ICE Detention Center in Southwest Georgia*, Georgia Recorder (Aug. 21, 2026), <https://georgiarecorder.com/2026/08/21/democratic-lawmakers-call-for-closure-of-ice-detention-center-in-southwest-georgia/>.

September 3, 2026
Page 9

Amilcar Valencia
Executive Director
El Refugio