



January 27, 2022

Via certified mail

Evangeline Parish Sheriff's Office  
Attn: Sheriff Charles R. Guillory  
200 Court Street, Suite 100  
Ville Platte, LA 70586

Re: Request for Information Under Louisiana Law La.R.S. 44:1 et seq.  
ICE Detainees at Pine Prairie ICE Processing Center

Dear Sheriff Guillory:

This is a request under Louisiana Open Records Law, La. R.S. § 44:1 et seq. for information relating to the Evangeline Parish Sheriff's Office (the "EPSO") administration of an Intergovernmental Service Agreement ("IGSA") or Dedicated Intergovernmental Service Agreement ("DIGSA") with U.S. Immigration and Customs Enforcement ("ICE") for the detention of ICE detainees at the Pine Prairie ICE Processing Center (the "Detention Facility"). We understand the Detention Facility is operated by the GEO Group, Inc. Because the EPSO is a public body under Louisiana law subject to the state's public records law, we request the following records:

- 1) Copy of the most recent IGSA or DIGSA, modification or amendment between ICE and the EPSO.
- 2) Copies of past IGSA's or DIGSA's between ICE and the EPSO.
- 3) Copies of the most recent contract between the EPSO and the GEO Group, Inc. for operation of the Detention Facility.
- 4) Copies of past contracts between the EPSO and GEO Group, Inc. for operation of the Detention Facility.
- 5) Communications between the Evangeline Parish Sheriff or any other EPSO officer and ICE personnel regarding the EPSO's entering into and renewing of the IGSA or DIGSA with ICE.
- 6) Records<sup>1</sup> maintained by the EPSO regarding calls for service received by the EPSO from the Detention Facility.
- 7) Records maintained by the EPSO since the inception of the IGSA or DIGSA, regarding detainees housed at the Detention Facility under the terms of the contract, including communications

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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.

between the Evangeline Parish Sheriff or any other EPSO officer and ICE personnel or employees of the GEO Group, Inc.

- 8) Copies of complaints filed with the EPSO 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 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 EPSO 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