



April 23, 2021

Submitted via email to: ADCentralRecords@dps.ohio.gov

Ohio State Highway Patrol Central Records PO Box 182074 Columbus, Ohio 43218-2074

Dear Sir or Madam:

This is a request under the Ohio Public Records Act, ORC Sec. 149.43, on behalf of Advocates for Basic Legal Equality ("ABLE"), a legal services organization that represents people living n poverty in individual and impact litigation in Ohio, and the American Immigration Council ("Council"), a national nonprofit immigration law organization that represents clients and groups in litigation, education, communication strategies, and cultural exchange to advance immigrant rights. We request to be provided with copies of, or the opportunity to inspect and copy, the following written, audio, or video records created by and/or in the possession of the Ohio State Highway Patrol ("OSHP") on or after October 1, 2015:

- 1. Communication between OSHP and the U.S. Border Patrol ("Border Patrol") Sandusky Bay Station on the following topics:
 - a. Requests for identification assistance by OSHP to the Border Patrol/Sandusky Bay Station
 - b. Requests for interpretation assistance by OSHP to the Border Patrol/Sandusky Bay Station
- 2. Communication with U.S. Border Patrol and/or Sandusky Bay Station regarding the planning and/or implementation of immigration enforcement actions, including but not limited to co-patrols or joint detail with OSHP.
- 3. Communication regarding arrest quotas, targets, goals, or expectations for OSHP employees during co-patrols with Sandusky Bay Station.
- 4. Communication with the Sandusky Bay Station and/or other federal agencies or components of the Department of Homeland Security

regarding suspicious activities or suspicious groups of people OSHP should look for or consider when interacting with noncitizens.

- 5. Communication regarding co-patrols or joint detail with the Sandusky Bay Station, including but not limited to records regarding the Northern Border Initiative, Operation Quick Hatch, and/or Operation Street Wise.
- 6. Communication regarding training (virtually and/or in person) by the Sandusky Bay Station that was attended by OSHP personnel.
- 7. Communication regarding training (virtually and/or in person) by OSHP personnel of Sandusky Bay Station/U.S. Border Patrol employees, including trainings offered to other agencies that Sandusky Bay Station employees attended where OSHP personnel conducted any part of the training.
- 8. Communication regarding task forces, joint operations, or joint detail between the Ohio State Highway Patrol and U.S. Border Patrol/Sandusky Bay Station.
- 9. Communication between Ohio State Highway Patrol employees and the U.S. Immigration and Customs Enforcement Law Enforcement Support Center.
- 10. Communication between Ohio State Highway Patrol employees and the El Paso Intelligence Center ("EPIC").

Should you deny this request, or any part of the request, please state in writing the basis for the denial, including the exact statutory citation authorizing the denial.

We respectfully request a prompt response as required by Ohio Revised Code § 149.43(B)(1). Because ABLE is a non-profit law firm, we also request a waiver of all fees for this request. If this fee waiver cannot be granted, or if you have any questions regarding the requests, please contact Kathleen Kersh at (937) 535-4408 or kkersh@ablelaw.org. Please return all responses to Kathleen Kersh. Thank you for your attention to this matter.

Sincerely,

s/ Kathleen Kersh
Kathleen Kersh
Emily Brown
Mark Heller
Eugenio Mollo
Advocates for Basic Legal Equality, Inc.
130 West 2nd Street, Ste. 700E
Dayton, OH 45402
Tel. (937) 535-4408
kkersh@ablelaw.org

s/Emily Creighton
Emily Creighton
American Immigration Council
Legal Department
1331 G Street, N.W., Suite 200
Washington, D.C. 20005
Tel. (202) 507-7514
ecreighton@immcouncil.org