

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
AMERICAN CIVIL LIBERTIES UNION, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 22-1721 (JEB)
)	
U.S. DEPARTMENT OF HOMELAND)	
SECURITY,)	
)	
Defendant.)	
_____)	

JOINT STATUS REPORT

Pursuant to the Court’s Minute Order dated November 15, 2023, Plaintiffs American Civil Liberties Union and American Civil Liberties Union Foundation and Defendant United States Department of Homeland Security (“DHS”) respectfully submit this Joint Status Report. This Freedom of Information Act case involves Plaintiffs’ requests for records concerning (1) how DHS, specifically the Center for Prevention Programs and Partnerships (“CP3”) and the Office of Intelligence and Analysis (“I&A”), assess targeted violence, risk management tools, and definitions of key terms used to formulate domestic terrorism frameworks; and (2) the input and guidance the Office for Civil Rights and Civil Liberties (“CRCL”) provides regarding CP3 programs and activities.

DHS Privacy

As stated in the September 13, 2023 Joint Status Report (ECF No. 26), DHS Privacy has completed its production except that certain pages are pending consultations with other offices/agencies. DHS continues to request status updates for the remaining outstanding consultation pages. DHS will produce the responsive, nonexempt records as they are returned. DHS anticipates

making an interim production consisting of records received in response to outstanding consultations in the next 30 days.

CRCL

CRCL has processed 1,274 pages and completed processing of all records responsive to Plaintiffs' request.

Office of I&A

Based on a May 23, 2023 agreement among the parties, the Office of I&A has been processing records found at a rate of 200 pages per month. Since the last status report, the Office of I&A further processed 200 pages in November of 2023, of which 56 pages were disclosed in full, 43 pages were disclosed in part, and 44 pages were withheld in full. The Office of I&A expects to release additional documents in January 2024 and to make monthly releases thereafter.

The parties agree to submit a joint status report to the Court on their progress by March 15, 2024.

Dated: January 16, 2024

Respectfully submitted,

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