

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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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 March 18, 2024, 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

On February 8, 2024, DHS produced the remainder of the pages that were pending consultations. Specifically, DHS produced 54 pages, in full, 16 pages in part, and withheld 8 pages. DHS Privacy has now completed its production.

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. In the last status report, the Office of I&A stated that it "reviewed 223 pages in February of 2024, which it will release to Plaintiff in March of 2024." ECF 30. However, the Office has not yet released the pages reviewed in February and intends to do so by June 17, 2024. Since the last status report, the Office of I&A processed 200 pages for the month of March, of which 24 pages were released in full, 10 pages were released in part, and 166 pages were non-responsive or duplicates, and the Office released those pages in April of 2024. The Office of I&A further processed 354 pages in April of 2024, of which all 354 pages were non-responsive or duplicates of pages previously reviewed. The Office of I&A expects to review and release additional documents in May of 2024 and to make monthly releases thereafter.

The parties agree to submit a joint status report to the Court on their progress by June 17, 2024.

Dated: May 15, 2024

Respectfully submitted,

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