

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.	)	

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**JOINT STATUS REPORT**

Pursuant to the Court’s Minute Order dated May 16, 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.

I&A

Based on a May 23, 2023 agreement among the parties, I&A has been processing records found at a rate of 200 pages per month. In the last status report, I&A stated that, by June 17, 2024, it intended to release the 251 pages that it reviewed in February of 2024. Since the last status report, I&A processed 251 pages, of which 166 pages were released in full, 63 pages were released in part, and 22 pages were withheld in full. I&A further processed 359 pages in May of 2024, of which all 359 pages were non-responsive or duplicates of pages previously reviewed. I&A expects to review and release additional documents in June of 2024 and to make monthly releases thereafter.

The parties agree to submit a joint status report to the Court on their progress by August 16, 2024.

Dated: June 17, 2024

Respectfully submitted,

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