UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

AMERICAN CIVIL LIBERTIES UNION, et al.,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY,

Defendant.

Civil Action No. 22-1721 (JEB)

JOINT STATUS REPORT

Pursuant to the Court's Minute Order dated June 17, 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.

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CRCL

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

<u>I&A</u>

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. Since the last status report, I&A processed 359 pages in June of 2024, of which sixteen pages were released in part, twenty-four pages were released in full, 265 pages were forwarded for consultation with another agency, and fifty-four pages were withheld in full. I&A further processed 306 pages in July of 2024, of which four pages were released in part, sixty-six pages were released in full, eight pages were withheld in full, and 228 pages were non-responsive or duplicates. I&A expects to review and release additional documents in August of 2024 and to make monthly releases thereafter.

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

Dated: August 16, 2024

Respectfully submitted,

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