

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 October 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 Privacy completed its production when it 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.

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 at least 200 pages per month. Since the last status report, I&A processed 302 pages in October 2024. Of those pages, six pages were released in part, twenty-five pages were released in full, seven pages were withheld in full, and the remaining 264 pages were found to be non-responsive or duplicates. I&A further processed 412 pages in November 2024, which were provided to Plaintiff on December 2, 2024. Of those 412 pages, thirty pages were released in part, six pages were released in full, fifty-five pages were referred for consultation, 118 pages were withheld in full, and the remaining 203 pages were found to be non-responsive or duplicates. I&A further processed 400 pages in December 2024. Of those pages, twenty-nine pages were released in part, sixty-three pages were released in full, sixty-four pages were referred for consultation, thirty-four pages were withheld in full, and the remaining 210 pages were found to be non-responsive or duplicates. I&A expects to review and release additional documents in January 2025 and to make monthly releases thereafter.

\* \* \*

The parties agree to submit a joint status report to the Court on their progress by April 16, 2025.

Dated: January 16, 2025

Respectfully submitted,

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