

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 January 16, 2025, 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 497 pages in January 2025. Of those pages, seven pages were released in part, eighty-two pages were released in full, four pages were withheld in full, and the remaining 404 pages were found to be non-responsive or duplicates. I&A further processed 527 pages in February 2025, responsive pages of which were provided to Plaintiff on March 6, 2025. Of those 527 pages, eleven pages were released in part, two pages were released in full, 301 pages were sent to other DHS components for consultation, and the remaining 213 pages were found to be non-responsive or duplicates. I&A further processed 500 pages in March 2025, responsive pages of which were provided to Plaintiff on April 1, 2025. Of those 500 pages, eight pages were released in part, one page was withheld in full, and the remaining 491 pages were found to be non-responsive or duplicates. I&A expects to review and release additional documents in April 2025 and to make monthly releases thereafter.

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

Dated: April 16, 2025

Respectfully submitted,

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