

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 April 17, 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 reviewed 525 pages in May 2025, the responsive, non-exempt portions of which were provided to Plaintiff on July 14, 2025. Of those 525 pages I&A reviewed, 8 pages were released in part, 54 pages were withheld in full, 74 pages have been referred to another Department or Agency for further consultation, and the remaining 389 pages were found to be non-responsive or duplicates. At this point, I&A has reviewed all pages returned from its search for responsive records. However, a number of pages from that search (approximately 350 pages in total) have been provided to other government agencies for consultation and have not yet been returned. I&A will produce the non-exempt portions of these pages to Plaintiff with any appropriate redactions once those other government agencies respond to I&A's request for consultation.

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

Dated: July 16, 2025

Respectfully submitted,

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