

Babel Street has kept Locate X a secret, not mentioning it in public-facing marketing materials and stipulating in federal contracts that even the existence of the data is "confidential information." Locate X must be "used for internal research purposes only," according to terms of use distributed to agencies, and law enforcement authorities are forbidden from using the technology as evidence — or mentioning it at all — in legal proceedings.

Federal records show that U.S. Customs and Border Protection purchased Locate X, and the Secret Service and U.S. Immigration and Customs Enforcement also use the location-tracking technology, according to a former Babel Street employee. Numerous other government agencies have active contracts with Reston-based Babel Street, records show, but publicly available contract information does not specify whether other agencies besides CBP bought Locate X or other products and services offered by the company.

None of the federal agencies, including CBP, would confirm whether they used the location-tracking software when contacted by Protocol. Babel Street's other products include an analytics tool it has widely marketed that sifts through streams of social media to "chart sentiment" about topics and brands.

A former government official familiar with Locate X provided an example of how it could be used, referring to the aftermath of a car bombing or kidnapping. Investigators could draw what is known as a geo-fence around the site, identify mobile devices that were in the vicinity in the days before the attack, and see where else those devices had traveled in the days, weeks or months leading up to the attack, or where they traveled afterward.

"If you see a device that a month ago was in Saudi Arabia, then you know maybe Saudis were involved," this person said. "It's a lead generator. You get a data point, and from there you use your other resources to figure out if it's valid."

A former Babel Street employee said the technology was deployed in a crackdown on credit card skimming, in which thieves install illegal card readers on gas station pumps, capturing customers' card data to use or sell online. The Secret Service was the lead agency in those investigations, which, according to published reports, led to arrests and the seizure of devices.

A spokesperson for the Secret Service declined to comment on its work with Babel Street, saying the agency does not reveal methods used to carry out missions.

While federal records show that CBP purchased Locate X and last year upgraded, paying for "premium" licenses, the records neither describe what Locate X does nor define the difference between a basic and premium license. A CBP spokesperson would not comment in detail about the use of the tool, but said the agency follows the law when deploying "open-source information."

Told of Protocol's reporting on Babel Street, Sen. Ron Wyden, a Democrat from Oregon who has pushed for tougher privacy legislation, questioned whether uses of the technology might violate the Fourth Amendment ban on unreasonable searches.

The Supreme Court, in the landmark case Carpenter v. United States, ruled in June 2018 that the government must obtain a search warrant to access cell-tower location data for individual phone accounts. The court "recognized that the government needs a warrant to get someone's location data," Wyden said. "Now the government is using its checkbook to try to get around Carpenter. Americans won't stand for that kind of loophole when it comes to our Fourth Amendment rights."

A spokesperson for Babel Street, Lacy Talton, declined to answer specific questions about the company's government sales or its Locate X technology, but said the firm handles data carefully to comply with both the law and internet terms of service. There is no indication Babel Street is doing anything illegal.

Sen. Ron Wyden said the U.S. Supreme Court has "recognized that the government needs a warrant to get someone's location data." Photo: Sarah Silbiger via Getty Images

"Although data content is freely available without restriction from thousands of vendors and suppliers, Babel Street employs a variety of measures to ensure appropriate use of the data," Talton said in a statement to Protocol. "This is not required by most vendors but stems from Babel Street's ethos of proper data compliance. The company regularly ensures that the data accessed through its software is in compliance with ever-changing global privacy regulations, data use rights, and terms of service."

The details of Babel Street's location-tracking technology and its contracts with the federal government have not been reported before. Last month, The Wall Street Journal reported that border and

immigration agents were tracking the location of cell phones, and looking for activity in suspicious places near the border, after buying data from Venntel Inc. of Herndon, Virginia.

Venntell is a subsidiary of location-based marketing company Gravy Analytics of Dulles, Virginia. Gravy Analytics has provided location data to Babel Street, according to former employees of both firms.

Taken together, the revelations suggest that the sale of personal location data from commercial firms to the government is more widespread and has been going on longer than previously known. The emergence of the technology comes amid growing, broader concern over the tracking of people's movements, whether through facial recognition, their license plates or the phones in their pockets.

While consumers enable location-based services on their cell phone apps, privacy advocates said people are generally unaware of how far their personal information could travel — and in particular that it could be piped to law enforcement.

The sources who spoke to Protocol, who independently described the location-tracking technology, were three former Babel Street employees, a former government official with firsthand knowledge of the company's products, and two former employees of Gravy Analytics. They requested anonymity because the information is sensitive, and some feared retribution from employers for speaking to the media.

A spokesperson for Gravy Analytics declined to comment on the company's relationship with Babel Street. She said Venntel is a "wholly owned subsidiary of Gravy Analytics that supports public sector initiatives."

She pointed to the company's privacy policy on its Web site: "We take consumer privacy seriously and ensure that our data platform remains fully transparent and compliant with industry and legal requirements," the policy reads. "Gravy ensures that 100% of our data complies with all local privacy laws, including required consumer consent and opt-out provisions."

### **From brand to threat management**

While there is little public information about Locate X, government contracting records provide a picture of Babel Street's growth and increasing popularity in federal law enforcement circles. The company registered Locate X with the U.S. Patent and Trademark Office in May 2017, and sales to federal agencies shot up afterward — from

\$64,000 in fresh contracts in 2016 to more than \$2.1 million in 2017 to nearly \$5.3 million in 2018.

Babel Street's sales spike was fueled in large part by four new customers: CBP, which signed \$3.2 million in contracts, ICE (\$1.1 million), the State Department's Bureau of Diplomatic Security (\$710,000), and the Secret Service's Criminal Investigations Division (\$313,858), the records show.

CBP signed a first contract worth \$981,000 for "Babel software" in September 2017. The Targeting and Analysis Systems Directorate, the CBP branch that purchased the software, apparently liked what it received. A year later, the agency signed a fresh contract worth \$2.2 million for "Babel software licenses." In March 2019, CBP filed an amended contract, worth an extra \$130,000, to "upgrade the current Babel Street Locate X licensing from basic to premium licenses as well as add an additional 10 licenses."

Asked about its use of Locate X, a CBP spokesperson told Protocol the agency uses a "variety of tools" that "may include tools to facilitate access to open-source data relevant to its border security mission. All CBP operations in which open-source information may be used are undertaken in furtherance of CBP's responsibility to enforce U.S. law at the border and in accordance with relevant legal, policy and privacy requirements."

In September 2018, ICE officials signed a one-year, \$1.1 million contract with Babel Street. The deal included Locate X, according to a former Babel Street employee. Last August, ICE signed a fresh five-year deal worth up to \$6.5 million with Babel Street for "data subscription services," records show.

A spokesperson for ICE said, "We do not discuss specific law enforcement tactics or techniques, or discuss the existence or absence of specific law-enforcement-sensitive capabilities." She also said, referring to cell phone location data, "ICE does not generally use this type of information for routine enforcement operations."

Other agencies with active Babel Street contracts include the Department of Justice, the U.S. Marshals Service, the Army, the Coast Guard, the Drug Enforcement Administration and the Department of Transportation's Office of Intelligence, Security and Emergency Response. The contract records are from USAspending.gov, the official source for U.S. government spending.



A spokesperson for the Department of Transportation, which signed a yearlong contract with Babel Street last May, said the Office of Intelligence, Security and Emergency Response "utilizes Babel Street software features depending on the nature of particular incidents." Spokespeople for the Army, the Bureau of Diplomatic Security, the DEA and the Marshals Service declined to comment on the contracts with Babel Street. The Department of Justice and the Coast Guard did not respond to requests for comment.

A spokesperson for a regional DEA office in El Paso, Texas, which signed a separate \$12,978 contract for a one-year Babel Street software license last September, denied that the agency had purchased the location-tracking data tool.

The technology was controversial enough that some agencies, including the FBI and the ATF, declined to purchase Locate X after those agencies' lawyers nixed it, a former Babel Street employee said.

A spokesperson for the FBI declined to comment. A spokesperson for the ATF, April Langwell, declined to comment on ATF procurement decisions. "ATF always works within DOJ guidelines with regard to the investigative techniques that we use and ensure that they are consistent with federal law and subject to court approval," Langwell said.

The former Babel Street employees and the former government official said Babel Street was careful about its clients for location data technology. For example, they said, it did not sell to commercial clients, local law enforcement agencies or foreign governments.

The software included pop-ups that reminded users it was to be used only in the investigation of serious crimes and matters of national security, one former employee said. However, after users complained that the pop-ups were annoying, the company removed them, the employee said. Babel Street did not respond to emailed questions about the pop-ups.

### **Secrecy to the extreme**

Despite the apparent power of the tool, Protocol could not find a single instance in which a federal agency had publicly described using Locate X, in an investigation or in any other capacity. And Babel Street appears to have taken a number of steps to keep the technology secret. The company advertises other products on its website and in press releases, but makes no mention of Locate X or the tracking of mobile devices.

Locate X's terms of use, spelled out in a single document published online by the General Services Administration, require government clients to agree that the product "will be used for internal research purposes only. Locate X data may not be used as the basis for any legal process in any country, including as the basis for a warrant or subpoena, or any other legal or administrative action." The terms state that Locate X data may not be "cited in any court/investigation-related document."

**2. Locate X Data.** EIS, as Reseller to Babel Street, shall provide the Locate X Data to Customer pursuant to the terms of the applicable Order Form. For avoidance of doubt, Locate X Data constitutes a "Data Feed" as defined in the Terms and, as such, shall be subject to the applicable Terms. In addition, the following additional terms shall also apply to the Locate X Data:

2.1. The existence and terms and conditions of this Addendum, and the Locate X Data in its entirety, shall be considered "Confidential Information" of Babel Street subject to the Terms. In addition, notwithstanding Section 9.1 of the Terms, Locate X Data may not be disclosed by Customer to any third party (including consultants, advisors, and/or independent contractors) without the prior written consent of an authorized representative of Babel Street; and

2.2. Any and all Locate X Data, including, but not limited to, results generated by Customer's use of the Locate X Data, will be used for internal research purposes only. Locate X Data may not be used as the basis for any legal process in any country, including as the basis for a warrant, subpoena, or any other legal or administrative action (nor may the Locate X Data be cited in any court/investigation-related document).

Terms of use for Babel Street's Locate X product state that the data "may not be used as the basis for any legal process." Illustration: 615 Productions

Protocol shared the terms of use in the Locate X contract with Nathan Wessler, a lawyer with the ACLU's Speech, Privacy, and Technology Project who argued the *Carpenter v. United States* case before the Supreme Court. He called the secrecy provisions "tremendously disturbing," raising the possibility that a criminal defendant might not know the tool had factored into a case — and therefore wouldn't be able to challenge its legality.

"These secrecy provisions prevent the courts from providing oversight," Wessler said. "That is really corrosive to our system of checks and balances."

In the past, Wessler noted, courts have been critical of nondisclosure agreements with law enforcement that are designed to protect sensitive surveillance technologies, notably in cases involving devices that mimic cell towers in order to capture phone information, often referred to by the brand name StingRays.

Scores of U.S. law enforcement agencies deployed the devices for years in secret without judicial scrutiny or public transparency. When use of the technology began to be exposed in criminal trials, the courts did not take a favorable view of the secrecy agreements. One of the more pointed opinions came in a 2016 ruling by a Maryland state appeals court judge, involving Baltimore police and an attempted murder suspect.

The use of a nondisclosure agreement to protect the technology is "inimical to the constitutional principles we revere," Judge Andrea M. Leahy wrote for the three-member court panel.

In 2015, both the Department of Justice and Homeland Security updated their policies to require law enforcement to disclose the use of cell site simulator technologies to the courts when used as part of an investigation. "In all circumstances, candor to the court is of paramount importance," the Homeland Security policy reads. "Applications for the use of a cell site simulator must include sufficient information to ensure that the courts are aware that the technology may be used."

### **The limits of anonymity**

One of the former Babel Street employees who spoke to Protocol cited another example of how Locate X could be used to protect U.S. national security. Investigators, this person said, could identify mobile devices carried near popular border crossing points into the U.S. and pull up the historical location data for those devices, viewing where they've been in the preceding months.

"If you are thinking about attack planning, and you know these devices were just at a Hezbollah or ISIS training camp, and now they're sitting in Juarez, maybe that matters," the former employee said.

Still, privacy experts told of Protocol's reporting on Locate X asserted that law enforcement officials' practice of buying data they would otherwise need a warrant to access amounts to a form of data laundering.

"That consumers can have data being collected that tracks their location, and the government, instead of getting a warrant, which they would normally need to do, can just go to a private company and buy it directly, that's hugely concerning," said Serge Egelman, a computer science professor at UC Berkeley who works on privacy issues.

In the Supreme Court's *Carpenter v. United States* case, the court held that investigators violated the Fourth Amendment by obtaining cell tower records without a warrant that placed a robbery suspect near the crimes. Chief Justice John Roberts wrote, in the majority opinion, that authorities in that case had failed "to contend with the seismic shifts in digital technology that made possible the tracking of not only Carpenter's location but also everyone else's, not for a short period but for years and years."

But whether courts would hold anonymous location data culled from mobile apps to the same standard is an open question.

A spokesperson for Wyden said the senator's aides had a phone call with Venntel attorneys on Feb. 20, in response to The Wall Street Journal article, to discuss the company's sale of location data to the government. A Wyden aide said Venntel's counsel declined to answer most questions, would not identify the company's government clients, and would not reveal the source of the data.

Babel Street's sale of location data to the government could also raise potential liability issues for app developers under the Stored Communications Act, said Wessler, the ACLU lawyer. The 1986 law prohibits providers of computing services or electronic communication to the public from knowingly divulging customer information to any government entity.

"The question for the app companies themselves is whether, now that they know that Babel Street is taking their customers' location data and providing it to law enforcement, are those companies themselves now liable under the Stored Communications Act," Wessler said.

Location data culled from mobile apps is said to be anonymized, with each device masked behind a nameless ID number. But experts say data can be traced back to individual users, based on their particular movements.

The New York Times reviewed a database of location data and reported in December 2018 that it was able to identify a woman as she traveled to her dermatologist's office, hiked with her dog and stayed

over at her ex-boyfriend's home. Babel Street did not respond to an emailed question about whether Locate X data can be de-anonymized.

### **Big sales, big hires**

Babel Street was founded in 2009 as Agincourt Solutions by former U.S. Navy Officer Jeff Chapman, and became Babel Street in 2014. On its website and in marketing materials, it describes itself as "the world's data-to-knowledge company," focusing on a service that analyzes streams of social media activity in multiple languages, often for brand management and sometimes linked to locations such as sports arenas. Early on, the promise of gleaning meaningful intelligence from Twitter feeds and other social media applications drew clients to Babel Street, according to government records, published reports and the former employees. The NFL has used Babel Street's analytics software. So, too, have at least 10 local law enforcement agencies around the country, according to the Brennan Center for Justice at New York University Law School.

Motherboard and The Washington Post wrote about the company's social media analytics software in 2017, noting heavy interest from police agencies overseeing major events like Super Bowls. On the government side, the FBI and the Army were among Babel Street's early customers. Michael Flynn, who served briefly as President Trump's national security adviser and later pleaded guilty to lying to the FBI, was once an adviser to the firm, according to Flynn's financial disclosure forms.

Just before the rollout of Locate X, the company hired a veteran Department of Justice privacy lawyer, Jill Maze, to be the company's chief privacy officer, according to former employees and Maze's LinkedIn account.

Subsequent hires suggest the company viewed location data as a growth area. In February 2019, Babel Street hired retired Maj. Gen. Mark Quantock, a former director of intelligence for U.S. Central Command, which includes the Middle East and Central Asia, and the former director of operations for the National Geospatial Intelligence Agency, essentially the government's headquarters for location data intelligence.

Three months later, the company hired a 20-year Pentagon veteran, Dave Dillow, who since 2003 has worked with special operations forces focused on integrating "publicly available information,"



or PAI, into the intelligence pipeline for those forces. Commercial location data is one type of PAI.

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The data used by Babel Street, said the former employees of Babel Street and Gravy Analytics, comes largely from third-party data aggregators who broker deals with mobile app developers, offering revenue in return and sometimes detailed analysis about how users are engaging with the app. Data aggregators who spoke to Protocol said they enable services like mapping and marketing, and comply with privacy regulations, which include requiring all app users to give their consent to sharing their data.

Privacy advocates say such consumer opt-ins are often buried in small print or otherwise clouded in vague or bureaucratic language, and that users have little visibility into how their data is used.

"That's the fundamental problem," said Egelman, the UC Berkeley professor. "The trafficking in this data is totally opaque to everyone who isn't a party to these transactions."

Charles Levinson

*Charles Levinson (@levinsonc) is a senior reporter at Protocol. Previously, he worked on investigative projects at Reuters, where he won awards for his reporting on Guantanamo Bay and skullduggery on Wall Street. Before that, he spent 12 years as a foreign correspondent in the Middle East for The Wall Street Journal. He covered the U.S. occupation of Iraq and that country's sectarian civil war, the Arab Spring uprisings in Tunisia, Egypt, Libya, Bahrain, and Syria, and Israel's wars in Lebanon and Gaza. He has reported from over 20 countries. He lives outside New York City.*

<https://www.protocol.com/government-buying-location-data>

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The Department of Homeland Security's Response to  
Senator Edward J. Markey's February 12, 2020 Letter

(b)(5)

(b)(5)

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(b)(5)

(b)(5)

(b)(5)



**From:** (b)(6); (b)(7)(C)  
**Sent:** 13 Mar 2020 17:00:23 +0000  
**To:** (b)(6); (b)(7)(C)  
**Subject:** RE: Venntel and WSJ Article

H (b)(6); (b)(7)(C)

I am going through my Venntel emails and I just realized I did not respond to your question. IRMNET is our domain which is controlled via ADEX, our system that contains Active Directory. That is where you would find user names. The ADEX system is covered under the DHS/ALL/PIA-012 E-Mail Secure Gateway PIA and the DHS/ALL-004 General Information Technology Access Accounts Records System (GITAARS) SORN.

Sorry!

Thanks, (b)(6);

(b)(6); (b)(7)(C) **.D./Joint M.S. Cybersecurity**  
Management and Program Analyst  
Office of Information Governance and Privacy, Privacy Division  
U.S. Immigration and Customs Enforcement  
Desk: 202-732-(b)(6);  
Mobile: 401-826-(b)(6);  
PCN: (b)(6);

---

**From:** (b)(6); (b)(7)(C)@ice.dhs.gov>  
**Sent:** Monday, February 10, 2020 2:49 PM  
**To:** (b)(6); (b)(7)(C)@ice.dhs.gov>  
**Cc:** (b)(6);@ice.dhs.gov>  
**Subject:** RE: Venntel and WSJ Article

Thank you (b)(6). This is hugely helpful. No need to reinvent the wheel here. I've drafted some responses based on the information you provided. Can you take a quick look and let me know what you think?

(b)(6); (b)(7)(C) I'm cc'ing you here because of (d) - (b)(5); (b)(6); (b)(7)(C)  
(b)(5)

(b)(5)

(b)(5)

(b)(6); (b)(7)(C)

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**From:** (b)(6); (b)(7)(C)  
**Sent:** 13 Mar 2020 13:37:02 +0000  
**To:** (b)(6); (b)(7)(C)  
**Subject:** RE: \*\*DUE TOMORROW AT 9AM\*\*FW: Review and Comment -20-00659- U.S. Senator Edward Markey writes AS1 re: DHS / ICE Purchase and Use of Data and Software that Tracks Location for Immigration Enforcement Purposes ICATT:0045175

Hey! I just reached out to (b)(6); who is the duty attorney and gave him a heads up. I can address the privacy questions, but some of the responses from HSI I have the urge to tweak. I am going to add my comments and try and slow the tasker down on my end. Good luck!

Thanks (b)(6);

(b)(6); (b)(7)(C) **J.D./Joint M.S. Cybersecurity**  
Management and Program Analyst  
Office of Information Governance and Privacy, Privacy Division  
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PCN: (b)(6);

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**From:** (b)(6); (b)(7)(C)@ice.dhs.gov>  
**Sent:** Friday, March 13, 2020 9:35 AM  
**To:** (b)(6); (b)(7)(C)@ice.dhs.gov>  
**Subject:** RE: \*\*DUE TOMORROW AT 9AM\*\*FW: Review and Comment -20-00659- U.S. Senator Edward Markey writes AS1 re: DHS / ICE Purchase and Use of Data and Software that Tracks Location for Immigration Enforcement Purposes ICATT:0045175

Hi (b)(6);

We haven't yet, but we usually get tasked after all components clear so I am not surprised we haven't seen it yet. I'll keep a look out – I'm on full-time doc review for today and next week, so I'll make my Chief aware this is coming so he can handle. If you want to run anything by me today, feel free to shoot me some text and I'll try to look at it when I take a break.

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**From:** (b)(6); (b)(7)(C) @ice.dhs.gov>  
**Sent:** Friday, March 13, 2020 9:00 AM  
**To:** (b)(6); (b)(7)(C) @ice.dhs.gov>  
**Subject:** FW: \*\*DUE TOMORROW AT 9AM\*\*FW: Review and Comment -20-00659- U.S. Senator Edward Markey writes AS1 re: DHS / ICE Purchase and Use of Data and Software that Tracks Location for Immigration Enforcement Purposes ICATT:0045175  
**Importance:** High

Has this tasker made its way to you? I am looking at it now. Let me know if you want to coordinate a response.

Thanks, (b)(6); (b)(7)(C)

(b)(6); (b)(7)(C), J.D./Joint M.S. Cybersecurity  
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**From:** (b)(6); (b)(7)(C) @ice.dhs.gov>  
**Sent:** Friday, March 13, 2020 8:54 AM  
**To:** (b)(6); (b)(7)(C) @ice.dhs.gov>  
**Subject:** FW: \*\*DUE TOMORROW AT 9AM\*\*FW: Review and Comment -20-00659- U.S. Senator Edward Markey writes AS1 re: DHS / ICE Purchase and Use of Data and Software that Tracks Location for Immigration Enforcement Purposes ICATT:0045175  
**Importance:** High

Hi (b)(6); (b)(7)(C)

(b)(5)

Would you mind seeing if this is something you are aware of? Our real due time is 1030, but if you are busy or can't get to it soon I'll take full responsibility with (b)(6); for it being late if she can't get the extension she requested.

Best,

(b)(6);

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**From:** (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>  
**Sent:** Thursday, March 12, 2020 10:34 AM  
**To:** (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>  
**Cc:** (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>  
**Subject:** \*\*DUE TOMORROW AT 9AM\*\*FW: Review and Comment -20-00659- U.S. Senator Edward Markey writes AS1 re: DHS / ICE Purchase and Use of Data and Software that Tracks Location for Immigration Enforcement Purposes ICATT:0045175  
**Importance:** High

Hello:

Tasking CL-20-00659 has been received by IGP. Please find a brief of the tasking below. **\*\*NOTE: PLEASE CONFIRM RECEIPT AND SPECIFY WHO WILL BE TAKING THE LEAD ON THIS TASKER.\*\***

Folder:	CL-20-00659
Received Date:	3/12/2020
<b>Due Date:</b>	<b>Friday 3/13/2020 9:00 AM</b>
Clearance Level:	Standard
IGP Assignees:	Privacy
Tasking Description:	U.S. Senator Edward Markey writes AS1 re: DHS / ICE Purchase and Use of Data and Software that Tracks Location for Immigration Enforcement Purposes
<b>Tasking Request:</b>	<p>IGP:</p> <p>Please review the following documents and provide edits / inputs / comments via track changes.</p> <p>Please note deferrals to IGP in the enclosure document.</p> <p>Documents for review / input:</p> <ul style="list-style-type: none"><li>• Cover Letter – 101327 - Cover Letter - Markey Response.docx</li><li>• Enclosure – 102054 - 20-00659-02.20-Geolocation Congressional Response - ATD (b)(6) Response_03112020.docx</li></ul> <p>Incoming Correspondence for reference:</p>



	• 99616 - Letter from Senator Markey to AS1 - 2.12.2020.pdf
Previous Assignees:	ERO Corr, HSI, OAQ
Current ICE Assignees:	IGP
Additional Information:	N/A
Access Files:	<u>CL-20-00659 Assigned To IGP</u>

Best,

(b)(6); (b)(7)(C)  
 Desk: 202-732 (b)(6); (b)(7)(C)  
 (b)(6); (b)(7)(C) @ice.dhs.gov

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**From:** (b)(6); (b)(7)(C) @ice.dhs.gov>  
**Sent:** Thursday, March 12, 2020 10:09 AM  
**To:** (b)(6); (b)(7)(C) @ice.dhs.gov>  
**Subject:** Review and Comment -20-00659- U.S. Senator Edward Markey writes AS1 re: DHS / ICE Purchase and Use of Data and Software that Tracks Location for Immigration Enforcement Purposes ICATT:0045175

Hello IGP,

A Clearance has been assigned to you. Please accept in 1 day

Clearance Name: CL-20-00659 Assigned To IGP

Due Date: 03/13/2020 10:30 AM Eastern

Instructions:

IGP:

Please review the following documents and provide edits / inputs / comments via track changes.

Please note deferrals to IGP in the enclosure document.

Documents for review / input:

- Cover Letter - 101327 - Cover Letter - Markey Response.docx
- Enclosure - 102054 - 20-00659-02.20-Geolocation Congressional Response - ATD (b)(6); (b)(7)(C) Response\_03112020.docx

Incoming Correspondence for reference:

- 99616 - Letter from Senator Markey to AS1 - 2.12.2020.pdf

Due:

NLT 10:30 AM - 3/13/2020

Thank you.

Best,

(b)(6); (b)(7)(C)

Correspondence Analyst  
Office of the Executive Secretariat  
Office of the Director  
U.S. Immigration and Customs Enforcement

202.734 (b)(6); (o)

202.284 (b)(7)(C) (c)

(b)(6); (b)(7)(C) [ice.dhs.gov](mailto:ice.dhs.gov)

Thank you.

The Department of Homeland Security's Response to  
Senator Edward J. Markey's February 12, 2020 Letter

(b)(5)

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(b)(5)

(b)(5)

(b)(5)



*Office of the Director*

**U.S. Department of Homeland Security**  
500 12th Street, SW  
Washington, DC 20536



**U.S. Immigration  
and Customs  
Enforcement**

(b)(5)

**From:** (b)(6); (b)(7)(C)  
**Sent:** 2 Jan 2020 21:14:36 +0000  
**To:** Loiacono, Adam V  
**Cc:** (b)(6); (b)(7)(C)  
**Subject:** RE: Data Project and Legal Opinion

Thanks,

We figured tomorrow COB was not realistic.

HSILD received it this a.m. It took a few hours to resolve some of CBP's comments prior to elevating.

Thanks,

(b)(6);

(b)(6); (b)(7)(C)

Acting Deputy Chief  
Homeland Security Investigations Law Division  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
(202) 73 (b)(6); (office)  
(202) 30 (b)(7)(C) (cell)  
(b)(6); (b)(7)(C) @ice.dhs.gov

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**From:** Loiacono, Adam V (b)(6); (b)(7)(C) @ice.dhs.gov>  
**Sent:** Thursday, January 2, 2020 4:06 PM  
**To:** (b)(6); (b)(7)(C) @ice.dhs.gov>  
**Cc:** (b)(6); (b)(7)(C) @ice.dhs.gov>; (b)(6); (b)(7)(C) @ice.dhs.gov>; (b)(6); (b)(7)(C) @ice.dhs.gov>; Loiacono, Adam V (b)(6); (b)(7)(C) @ice.dhs.gov>  
**Subject:** RE: Data Project and Legal Opinion

(b)(6);  
(b)(7)(C)

There is no way that Mike and I (and maybe Tracy) are going to be able to review this in one day. Please let CBP OCC know we will try to get back to them on Tuesday. When did we get this?

Adam V. Loiacono  
Deputy Principal Legal Advisor for Enforcement and Litigation  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
Desk: 202-731-(b)(6);  
Iphone: 202-1-(b)(7)(C)  
(b)(6); (b)(7)(C) @ice.dhs.gov

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**From:** (b)(6); (b)(7)(C) @ice.dhs.gov>  
**Sent:** Thursday, January 2, 2020 4:03 PM  
**To:** (b)(6); (b)(7)(C) @ice.dhs.gov>  
**Cc:** (b)(6); (b)(7)(C) @ice.dhs.gov>; (b)(6); (b)(7)(C) @ice.dhs.gov>  
**Subject:** Data Project and Legal Opinion  
**Importance:** High

Adam,

Please find attached for OPLA senior management review the collective edits from CBP OCC and HSILD in response to DHS OGC's comments.

Given the tight time constraints, HSILD sent this version to (b)(6); (b)(7)(C) (GILD) for review of the Privacy Act section. HSILD expects to receive GILD's comments, if any, by tomorrow afternoon.

CBP OCC asked OPLA to review the current version today so it can be provided to DHS OGC by COB tomorrow (1/3/2020). This does not seem like a realistic deadline.

Given that this needs to be reviewed by OPLA senior management per your email, below, please let me know if the COB 1/3/2020 deadline is unrealistic (27 page document with extensive edits / comments) so HSILD can provide CBP OCC with our revised deadline to respond to DHS OGC.

Thanks,

(b)(6); (b)(7)(C)

Acting Deputy Chief  
Homeland Security Investigations Law Division  
Office of the Principal Legal Advisor

U.S. Immigration and Customs Enforcement

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Legal Advisor, U.S. Immigration and Customs Enforcement. This document is for INTERNAL GOVERNMENT USE ONLY and may be exempt from disclosure under the Freedom of Information Act, 5 USC §§ 552(b)(5), (b)(7).

---

**From:** Loiacono, Adam V (b)(6); (b)(7)(C) @ice.dhs.gov>

**Sent:** Tuesday, December 17, 2019 9:56 AM

**To:** (b)(6); (b)(7)(C) @ice.dhs.gov>; (b)(6); (b)(7)(C)

(b)(6); (b)(7)(C) @ice.dhs.gov>; (b)(6); (b)(7)(C) @ice.dhs.gov>

**Cc:** Loiacono, Adam V (b)(6); (b)(7)(C) @ice.dhs.gov>

**Subject:** FW: Data Project and Legal Opinion

Folks-

Please make sure to build in a few days for OPLA leadership review. Since this is a legal opinion going to a DGC, Mike, Tracy, and I would need to review.

Adam V. Loiacono  
Deputy Principal Legal Advisor for Enforcement and Litigation  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
Desk: 202-732-(b)(6);  
Iphone: 202-500-(b)(6); (b)(7)(C)  
(b)(6); (b)(7)(C) @ice.dhs.gov

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**From:** (b)(6); (b)(7)(C) @ice.dhs.gov>  
**Sent:** Friday, December 13, 2019 5:00 PM  
**To:** (b)(6); (b)(7)(C) @cbp.dhs.gov>; (b)(6); (b)(7)(C) (OCC)  
(b)(6); (b)(7)(C) @CBP.DHS.GOV>; (b)(6); (b)(7)(C) @cbp.dhs.gov>  
**Cc:** (b)(6); (b)(7)(C) @ice.dhs.gov>; (b)(6); (b)(7)(C) @ice.dhs.gov>; Loiacono, Adam V (b)(6); (b)(7)(C) @ice.dhs.gov>; (b)(6); (b)(7)(C) @cbp.dhs.gov>  
**Subject:** RE: Data Project and Legal Opinion

Good Afternoon CBP Colleagues,

I will take a look at the comments more closely over the weekend and try to determine if there's a good way to tackle our response - but I'm expecting that it may make sense for me to take the pen first as I'm out between 12/23-1/1. If there's an elegant way to divide and conquer DHS OGC's comments so that we can work on simultaneously, I am certainly open to suggestions!

I will touch base early next week so that we can get the ball rolling, considering the tight early January timeframe. Let me know if a conference call next week would be helpful, too.

Thank you all for your close collaboration on this so far! Have a nice weekend.

Best,

(b)(6);  
(b)(7)(C)

---

(b)(6); (b)(7)(C)

Associate Legal Advisor  
Homeland Security Investigations Law Division  
Office of the Principal Legal Advisor  
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202-493-(b)(7)(C) (mobile)  
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**From:** (b)(6); (b)(7)(C)  
**Sent:** 10 Feb 2020 17:26:05 +0000  
**To:** (b)(6); (b)(7)(C)  
**Subject:** Accepted: Touch Base re: Venntel

**From:** (b)(6); (b)(7)(C)  
**Sent:** 6 Jan 2020 22:16:31 +0000  
**To:** (b)(6); (b)(7)(C)  
**Cc:** (b)(6); (b)(7)(C); Loiacono, Adam V  
**Subject:** AdID Legal Opinion - Final Draft  
**Attachments:** AdID Legal Opinion\_CBP 1.2.20 draft\_ICE 1.2.20FINAL (OPLA 1.6.20).docx

Good Afternoon (b)(6); (b)(7)(C) -

Please find attached an OPLA redline for final review and elevation. Please note to your management that Adam Loiacono, cc'd here, advised DHS OGC (b)(6); (b)(7)(C) that OPLA needed some additional time to review, and that Ian asked to get this by COB Wednesday. Please also note that after we have a relatively final draft, OPLA would also recommend having our respective component privacy offices review the Privacy Act section.

Please let me know if you have any questions or would like to discuss. Thanks and have a great evening!

Best,

(b)(6);  
(b)(7)(C)

---

(b)(6); (b)(7)(C)

Associate Legal Advisor  
Homeland Security Investigations Law Division  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
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**From:** (b)(6); (b)(7)(C)  
**Sent:** 8 Jan 2020 23:35:08 +0000  
**To:** (b)(6); (b)(7)(C)  
**Cc:** (b)(6); (b)(7)(C); Loiacono, Adam V  
**Subject:** AdID Legal Opinion  
**Attachments:** AdID Legal Opinion (CBP + ICE 1.8.20).docx

Good evening (b)(6)

Attached is a revised draft of the AdID Legal Opinion that is the collaborative work of CBP OCC and OPLA. Both management teams have reviewed, and with (b)(6); (b)(7)(C) presently out of the office, OPLA is handling the final elevation. Please let us know if you have any questions. Thanks.

(b)(6);  
(b)(7)(C)

(b)(6); (b)(7)(C)

Chief

Homeland Security Investigations Law Division

Office of the Principal Legal Advisor

U.S. Immigration and Customs Enforcement

U.S. Department of Homeland Security

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(305) 971-(b)(7)(C) cell

(b)(6); (b)(7)(C)@dhs.gov

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**From:** (b)(6); (b)(7)(C)  
**Sent:** 7 Feb 2020 21:23:52 +0000  
**To:** Loiacono, Adam V  
**Subject:** DRAFT: Wall Street Journal Article on DHS Contract with Venntel

Adam,

Below is a blurb in the event the front office asks about a Wall Street Journal article written about Venntel.

(b)(6);  
(b)(7)(C)

\*\*\*DRAFT\*\*\*

(b)(5); WIF Draft

\*\*\*DRAFT\*\*\*

(b)(6); (b)(7)(C)

Chief  
Homeland Security Investigations Law Division  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
U.S. Department of Homeland Security  
(202) 731- desk  
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(b)(6); (b)(7)(C) @dhs.gov

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**From:** (b)(6); (b)(7)(C)  
**Sent:** 8 Jan 2020 20:55:19 +0000  
**To:** (b)(6); (b)(7)(C)  
**Cc:**  
**Subject:** FW: AdID Legal Opinion - Final Draft  
**Attachments:** AdID Legal Opinion (1.8.20).docx

(b)(6); (b)(7)(C)

I've reviewed CBP OCC's comments and have no objections to their additions (very helpfully, they outlined them below). I believe this is ready to be transmitted to DHS OGC with CBP OCC cc'd on the response back.

I will forward this final draft to GILD (b)(6); (b)(7)(C) as a heads up to the additional Privacy Act remedies section, but I do not think we need to wait for her review to move forward, as she agreed to the addition of a section on remedies in her comment.

Best,

(b)(6); (b)(7)(C)

---

(b)(6); (b)(7)(C)

Associate Legal Advisor  
Homeland Security Investigations Law Division  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
202-732-(b)(6); (b)(7)(C) (office)  
202-494-(b)(6); (b)(7)(C) (mobile)  
(b)(6); (b)(7)(C)@ice.dhs.gov

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**From:** (b)(6); (b)(7)(C)@cbp.dhs.gov>  
**Sent:** Wednesday, January 8, 2020 3:08 PM  
**To:** (b)(6); (b)(7)(C)@ice.dhs.gov>  
**Cc:** (b)(6); (b)(7)(C)@cbp.dhs.gov> (b)(6); (b)(7)(C) (OCC)  
<(b)(6); (b)(7)(C)@CBP.DHS.GOV>; (b)(6); (b)(7)(C) (OCC)

(b)(6); (b)(7)(C)@cbp.dhs.gov>

**Subject:** RE: AdID Legal Opinion - Final Draft

Good afternoon, (b)(6); (b)(7)(C)

CBP OCC's final edits to the AdID Legal Opinion are attached. Our more significant edits are detailed below:

- (b)(5)
- 
- 
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- 
- 
- 

Please let us know if you have any questions.

Thank you,

(b)(6);  
(b)(7)(C)

(b)(6); (b)(7)(C)

Attorney, Enforcement and Operations

Office of Chief Counsel

U.S. Customs and Border Protection

Desk: 202-344-(b)(6);

Cell: 202-557-(b)(6);

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**From:** (b)(6); (b)(7)(C) @ice.dhs.gov>  
**Sent:** Monday, January 6, 2020 5:17 PM  
**To:** (b)(6); (b)(7)(C) @cbp.dhs.gov> (b)(6); (b)(7)(C) (OCC)  
(b)(6); (b)(7)(C) @cbp.dhs.gov>  
**Cc:** (b)(6); (b)(7)(C) @ice.dhs.gov>; Loiacono, Adam V  
(b)(6); (b)(7)(C) @ice.dhs.gov>  
**Subject:** AdID Legal Opinion - Final Draft

Good Afternoon (b)(6); (b)(7)(C) -

Please find attached an OPLA redline for final review and elevation. Please note to your management that Adam Loiacono, cc'd here, advised DHS OGC (b)(6); (b)(7)(C) that OPLA needed some additional time to review, and that Ian asked to get this by COB Wednesday. Please also note that after we have a relatively final draft, OPLA would also recommend having our respective component privacy offices review the Privacy Act section.

Please let me know if you have any questions or would like to discuss. Thanks and have a great evening!

Best,

(b)(6); (b)(7)(C)

---

(b)(6); (b)(7)(C)

Associate Legal Advisor  
Homeland Security Investigations Law Division  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
202-732 (b)(6); (b)(7)(C) office)  
202-494 (b)(6); (b)(7)(C) mobile)  
(b)(6); (b)(7)(C) @ice.dhs.gov

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**From:** (b)(6); (b)(7)(C)  
**Sent:** 17 Dec 2019 15:49:14 +0000  
**To:** (b)(6); (b)(7)(C)  
**Cc:**  
**Subject:** FW: Data Project and Legal Opinion  
**Attachments:** Commercial Geolocation Data Legal Opinion (DRAFT v3 - OGC 12.11.19) (clean).docx, Commercial Geolocation Data Legal Opinion (DRAFT v3 - OGC 12.11.19) (markup).docx  
**Importance:** High

(b)(6);  
(b)(7)(C)

I'll weigh in as Acting.

Any deadline before mid-January is unreasonable, especially if it will have to be cleared through OPLA Sr. Mgt.

I'd note (if I am reading this correctly) (b)(6); (b)(7)(C) rec'd our version on 11/22 and returned it on 12/11 w/ extensive comments. The larger issue sat w/ OGC awhile before they even sent it to us in November for our input.

I know from our discussions, (b)(6); (b)(7)(C) is busy overall, we have an approved team event Thursday afternoon and (b)(6); (b)(7)(C) has approved leave from 12/23 – 1/1.

Senior management should push back on this deadline; it is totally unfair to (b)(6); (b)(7)(C) especially this time of year. It is not an urgent project overall.

Thanks,

(b)(6);  
(b)(7)(C)

---

**From:** (b)(6); (b)(7)(C) @ice.dhs.gov>  
**Sent:** Tuesday, December 17, 2019 9:59 AM  
**To:** (b)(6); (b)(7)(C) @ice.dhs.gov>  
**Cc:** (b)(6); (b)(7)(C) @ice.dhs.gov>  
**Subject:** FW: Data Project and Legal Opinion

Hi (b)(6);  
(b)(7)(C)

Just so I'm clear on what he's asking – do they need to review it before it goes back to OGC with OCC/my combined comments, or before I send it to OCC with my comments, in which case, I will have to finish by tomorrow or Thursday, basically, which is not sufficient time.

---

(b)(6); (b)(7)(C)

Associate Legal Advisor  
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Office of the Principal Legal Advisor  
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**From:** Loiacono, Adam V <(b)(6); (b)(7)(C)@ice.dhs.gov>  
**Sent:** Tuesday, December 17, 2019 9:56 AM  
**To:** (b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@ice.dhs.gov  
**Cc:** Loiacono, Adam V <(b)(6); (b)(7)(C)@ice.dhs.gov>  
**Subject:** FW: Data Project and Legal Opinion

Folks-

Please make sure to build in a few days for OPLA leadership review. Since this is a legal opinion going to a DGC, Mike, Tracy, and I would need to review.

Adam V. Loiacono  
Deputy Principal Legal Advisor for Enforcement and Litigation  
Office of the Principal Legal Advisor  
U.S. Immigration and Customs Enforcement  
Desk: 202-732-(b)(6);  
Iphone: 202-500-(b)(6);  
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**From:** (b)(6); (b)(7)(C)@ice.dhs.gov  
**Sent:** Friday, December 13, 2019 5:00 PM  
**To:** (b)(6); (b)(7)(C) (OCC) (b)(6); (b)(7)(C)@cbp.dhs.gov; (b)(6); (b)(7)(C) (OCC) (b)(6); (b)(7)(C)@CBP.DHS.GOV; (b)(6); (b)(7)(C) (OCC) (b)(6); (b)(7)(C)@cbp.dhs.gov  
**Cc:** (b)(6); (b)(7)(C)@ice.dhs.gov; (b)(6); (b)(7)(C)@ice.dhs.gov; Loiacono, Adam V <(b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C) (OCC) (b)(6); (b)(7)(C)@cbp.dhs.gov  
**Subject:** RE: Data Project and Legal Opinion

Good Afternoon CBP Colleagues,

I will take a look at the comments more closely over the weekend and try to determine if there's a good way to tackle our response - but I'm expecting that it may make sense for me to take the pen first as I'm out between 12/23-1/1. If there's an elegant way to divide and conquer DHS OGC's comments so that we can work on simultaneously, I am certainly open to suggestions!

I will touch base early next week so that we can get the ball rolling, considering the tight early January timeframe. Let me know if a conference call next week would be helpful, too.

Thank you all for your close collaboration on this so far! Have a nice weekend.

Best,

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

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**From:** (b)(6); (b)(7)(C)@hq.dhs.gov>

**Sent:** Wednesday, December 11, 2019 2:43 PM

**To:** (b)(6); (b)(7)(C) (OCC) <(b)(6); (b)(7)(C)@cbp.dhs.gov>; (b)(6); (b)(7)(C)  
(b)(6); (b)(7)(C)@ice.dhs.gov>

**Cc:** (b)(6); (b)(7)(C) (OCC) <(b)(6); (b)(7)(C)@CBP.DHS.GOV>; (b)(6); (b)(7)(C) (OCC)  
(b)(6); (b)(7)(C)@cbp.dhs.gov>

**Subject:** RE: Data Project and Legal Opinion

(b)(6); (b)(7)(C)

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