



November 22, 2021

Via Electronic Mail

Patrick C. Lee
General Counsel
Plymouth County Sheriff's Department
24 Long Pond Road
Plymouth, MA 02360
plee@pcsdma.org

Re: Public Records Request

Dear Mr. Lee:

This is a request for public records under M.G.L. ch. 66, § 10, made on behalf of the American Civil Liberties Union of Massachusetts, Inc. ("ACLUM").

The following terms are defined for purposes of this request:

- "PCSD" shall refer to the Plymouth County Sheriff's Department.
- "PCCF" shall refer to the Plymouth County Correctional Facility.
- "Immigration Detainee" shall refer to civil immigration detainees held at the PCCF or otherwise in the custody of the PCSD.

Please provide the following records:

1. Records reflecting the number of immigration detention units at PCCF and the current number of Immigration Detainees in each unit on November 22, 2021.
2. Any and all PCSD or PCCF policies "for completing and signing nonimmigrant status certification forms for: (i) victims of criminal activity who intend to petition for nonimmigrant visas under 8 U.S.C. 1101(a)(15)(U)," in effect from 2019 to the present. *See* M.G.L. Chapter 258F Section 2.

3. All policies, procedures, guidelines, and instructions pertaining to access to PCCF's formal grievance system, including PCCF 491.

To the extent you contend that any of the requested records are not public records, or are otherwise exempt from disclosure in response to this request, you should take steps to ensure that such records are preserved, and are not modified, deleted, or destroyed, pending our review of your contention and the resolution of any resulting dispute.

Please waive any fees and copying costs, including pursuant to 950 C.M.R. 32.07. ACLUM is a not-for-profit, non-partisan organization dedicated to the principles of liberty and equality. As the Massachusetts affiliate of the national ACLU, a not-for-profit, non-partisan organization, ACLUM distributes information both within and outside of Massachusetts. Gathering and disseminating current information to the public is a critical and substantial component of ACLUM's mission and work. ACLUM publishes newsletters, news briefings, reports and other printed materials that are disseminated to the public. These materials are widely available to everyone, including tax-exempt organizations, not-for-profit groups, law students and faculty, at no cost. ACLUM also disseminates information through its website¹ and regular posts on social media sites such as Facebook and Twitter. Accordingly, disclosure of the records serves the public interest, and not the commercial interest of ACLUM.

If you withhold some portions of the requested documents on the grounds that they are exempt from disclosure, please specify which exemptions apply and release any portions of the records for which you do not claim an exemption. We ask that you provide the records in electronic format to the maximum extent possible.

As you know, a custodian of public records shall comply with a request within ten days of receipt.

Thank you for your assistance. Please do not hesitate to contact us at koehlke@aclum.org if we can clarify any part of this request.

Sincerely,

/s/ Krista Oehlke
Krista Oehlke
ACLU of Massachusetts

¹ www.aclum.org