

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IMMIGRANT DEFENSE PROJECT, HISPANIC  
INTEREST COALITION OF ALABAMA, CENTER  
FOR CONSTITUTIONAL RIGHTS,

*Plaintiffs,*

v.

UNITED STATES IMMIGRATION AND CUSTOMS  
ENFORCEMENT, DEPARTMENT OF HOMELAND  
SECURITY,

*Defendants.*

DOCKET NO.: 14-CV-1578 (JPO)

**Document Electronically Filed**

**DECLARATION OF GHITA SCHWARZ IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, Ghita Schwarz, hereby declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge:

1. I am an attorney at the Center for Constitutional Rights (“CCR”), counsel for Plaintiffs in this litigation. I am admitted to practice in this Court. I make this Declaration in Support of Plaintiffs’ Memorandum of Law in Support of their Motion for Partial Summary Judgment.

2. Attached hereto as Exhibit 1 is a “Search Chart,” compiled by Plaintiffs’ counsel citing to information found in Defendants’ declarations (attached hereto as Exhibits 2-5).

3. Attached hereto as Exhibit 2 is a true and correct copy of the September 30, 2015 Declaration of Paula Harrington, Unit Chief of the Information Disclosure Unit within Enforcement and Removal Operations (ERO) of Defendant agency U.S. Immigration and Customs Enforcement (ICE).

4. Attached hereto as Exhibit 3 is a true and correct copy of the September 30, 2015 Declaration of Reba McGinnis, Unit Chief of the Information Disclosure Unit, Policy, Planning and Records Management Division, Mission Support within Homeland Security Investigations (H.S.I.) of Defendant agency U.S. Immigration and Customs Enforcement (ICE).

5. Attached hereto as Exhibit 4 is a true and correct copy of the September 30, 2015 Declaration of Fernando Pineiro, FOIA Officer at the Freedom of Information Act Office of Defendant agency U.S. Immigration and Customs Enforcement (ICE).

6. Attached hereto as Exhibit 5 is a true and correct copy of the September 30, 2015 Declaration of Kevin Tyrrell, Associate Director of FOIA Appeals and Litigation for the Privacy Office of Defendant agency Department of Homeland Security (DHS).

7. Attached hereto as Exhibit 6 is a true and correct copy of a December 19, 2011 ICE Office of Professional Responsibility Report of Investigation, Bates No. ICE2014-FOIA-01578.005625, as produced to Plaintiffs in this litigation.

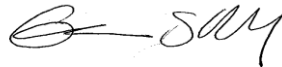
8. Attached hereto as Exhibit 7 is a true and correct copy of an excerpted page from the ICE “Quick Reference Guide,” Bates No. ICE2014-FOIA-01578.003217, as produced to Plaintiffs in this litigation.

9. Attached hereto as Exhibit 8 is a list of search terms that Plaintiffs respectfully propose to be used for new searches of the ERO Field Offices and H.S.I. SAC Offices in Buffalo, New York, and New Orleans.

Date: February 19, 2016

New York, New York

Respectfully submitted,



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