

Vasudha Talla

From: Robinson, Kimberly (USACAN) <Kimberly.Robinson3@usdoj.gov>
Sent: Friday, December 7, 2018 11:47 AM
To: Vasudha Talla
Subject: ACLU v. ICE - 18-cv-03050, December Production
Attachments: 'ERO December 2018 Release' of '2018-ICLI-00035'.pdf; ACLU NC v. ICE 2018-ICLI-00035 December Production.pdf; 'Re-release' of '2018-ICLI-00035'.pdf; ACLU Mini Vaughn 12.7.2018.xlsx

Vasudha,

I hope you're well. I will be sending four emails (this one included) with the items promised today.

This email contains the production, re-released pages, mini-Vaughn, and the cover letter.

There are seven excels that I will send over three more emails.

Please let me know when in the coming weeks you would like to discuss further.

Thanks,
Kim



Kim Robinson | Assistant U.S. Attorney | Northern District of California |
450 Golden Gate Ave. | Box 36055 | San Francisco, CA 94102 |
T: 415.436.7298 | F: 415.436.6748

Vasudha Talla

From: Robinson, Kimberly (USACAN) <Kimberly.Robinson3@usdoj.gov>
Sent: Friday, December 7, 2018 11:48 AM
To: Vasudha Talla
Subject: ACLU v. ICE - 18-cv-03050, December Production
Attachments: LEARN_Audit Queries_Report_09-26-18_July 2018-highlighted.xlsx; LEARN_Audit Queries_Report_09-26-18_June 2018-highlighted.xlsx; LEARN_Audit Queries_Report_09-26-18_August 2018-highlighted.xlsx

Vasudha,

Email number 2.

Kim



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Vasudha Talla

From: Robinson, Kimberly (USACAN) <Kimberly.Robinson3@usdoj.gov>
Sent: Friday, December 7, 2018 11:49 AM
To: Vasudha Talla
Subject: ACLU v. ICE - 18-cv-03050, December Production
Attachments: LEARN_Audit Queries_Report_06-08-18_March 2018-highlighted.xlsx; LEARN_Audit Queries_Report_07-17-18_May 2018 rerun-highlighted.xlsx

Vasudha,

Email number 3.

Kim



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Vasudha Talla

From: Robinson, Kimberly (USACAN) <Kimberly.Robinson3@usdoj.gov>
Sent: Friday, December 7, 2018 11:50 AM
To: Vasudha Talla
Subject: ACLU v. ICE - 18-cv-03050, December Production
Attachments: LEARN_Audit Queries_Report_06-08-18_April 2018-highlighted.xlsx; LEARN_Audit Queries_Report_06-08-18_February 2018-highlighted.xlsx

Vasudha,

Email 4 of 4. The last 2 excels.

Thanks,
Kim



Kim Robinson | Assistant U.S. Attorney | Northern District of California |
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Vasudha Talla

From: Robinson, Kimberly (USACAN) <Kimberly.Robinson3@usdoj.gov>
Sent: Friday, December 7, 2018 12:49 PM
To: Vasudha Talla
Subject: RE: ACLU v. ICE - 18-cv-03050, December Production

Thanks, Vasudha.

There will be one more email (which will actually make the cover letter attached to my first email slightly inaccurate, as there will now be five excel sheets instead of four). I'm confirming one final thing about the content of that last email before sending, and then will pass it along.

Thanks again,
Kim



Kim Robinson | Assistant U.S. Attorney | Northern District of California |
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From: Vasudha Talla <vtalla@aclunc.org>
Sent: Friday, December 07, 2018 12:45 PM
To: Robinson, Kimberly (USACAN) <KRobinson@usa.doj.gov>
Subject: RE: ACLU v. ICE - 18-cv-03050, December Production

Thanks, Kim. I'm confirming receipt of all four emails. I'll take a look at the material and get back to you early next week on a meet-and-confer.

Have a good weekend. Vasudha

From: Robinson, Kimberly (USACAN) <Kimberly.Robinson3@usdoj.gov>
Sent: Friday, December 7, 2018 11:47 AM
To: Vasudha Talla <vtalla@aclunc.org>
Subject: ACLU v. ICE - 18-cv-03050, December Production

Vasudha,

I hope you're well. I will be sending four emails (this one included) with the items promised today.

This email contains the production, re-released pages, mini-Vaughn, and the cover letter.

There are seven excels that I will send over three more emails.

Please let me know when in the coming weeks you would like to discuss further.

Thanks,
Kim



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Vasudha Talla

From: Robinson, Kimberly (USACAN) <Kimberly.Robinson3@usdoj.gov>
Sent: Friday, December 7, 2018 12:55 PM
To: Vasudha Talla
Subject: ACLU v. ICE - 18-cv-03050, December Production
Attachments: LEARN_Hot-List_Records_Report_12-07-18_001-highlighted.xlsx

Vasudha,

As I mentioned in my last email, here is one last email containing the “hot-list.” Also as I mentioned, the cover letter inaccurately states that there are only four excel sheets in this production when there are actually five. The attached being the fifth.

This is a report run through today’s date, which, as you know, is beyond the search date requested. Notably, all of the excels included in this production are through dates more recent than the requested search date. In general, the agency hopes this satisfies your FOIA requests.

Have a nice weekend.

Kim



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Vasudha Talla

From: Robinson, Kimberly (USACAN) <Kimberly.Robinson3@usdoj.gov>
Sent: Friday, November 16, 2018 12:46 PM
To: Vasudha Talla
Cc: Linda Lye
Subject: RE: ACLU v. ICE - 18-cv-03050

Vasudha,

As promised, ICE has provided the following information in response to your below email. See you in about an hour.

Kim

In the excel spreadsheet entitled "Learn-AU", what do the following fields refer to?

- (1) query type: **category of action being taken**
- (2) user type: **agency manager vs user. Manager can add/delete users (system admin); users everyone else.**
- (3) date time: **date and time of action.**
- (4) result: **number of hits on plate. N/A=means action wouldn't generate results.**

Also; what do the various response options refer to. For example, there is a query type "detection browsing," [**user searching target plate**] but also a query type "email hit alert" [**action generated after user received email alert**] – what do these and the other entries refer to?

- Batch plate search detection = user searching batch plates.**
- Hit list browsing = user browsing active hits out there.**
- Hot list edit = when item edited by a user.**
- Hot list management = editing of overall list, such as deletion or addition to overall list.**
- Hot list renewal = user gets notification when plate will expire.**

And in the "result" column, sometimes there is a numeric entry (e.g., 4 or 50) – what does this refer to? **The number of hits.**

In the excel spreadsheet entitled "LEARN audit report 2-28-2018", what do the following fields refer to:

- (1) query type: **category of action being taken**
- (2) user name: **user name**
- (3) user type: **agency manager vs user. Manager can add/delete users (system admin); users everyone else.**
- (4) plateID: **target plate.**
- (5) case number: **what number user inputs to track case, could be name case #, etc.**
- (6) requestor: **requestor runs search, but 99% of time equals user.**
- (7) date time: **date and time of action.**
- (8) IP address: **IP address of user.**

Further, like above, what do the various entries under query type refer to.

Also; what do the various response options refer to. For example, there is a query type "detection browsing," [**user searching target plate**] but also a query type "email hit alert" [**action generated after user received email alert**] – what do these and the other entries refer to?

- Batch plate search detection = user searching batch plates.**

Hit list browsing = user browsing active hits out there.

Hot list edit = when item edited by a user.

Hot list management = editing of overall list, such as deletion or addition to overall list.

Hot list renewal = user gets notification when plate will expire.

From: Vasudha Talla <vtalla@aclunc.org>
Sent: Tuesday, November 13, 2018 3:42 PM
To: Robinson, Kimberly (USACAN) <KRobinson@usa.doj.gov>
Cc: Linda Lye <llye@aclunc.org>
Subject: RE: ACLU v. ICE - 18-cv-03050

Thanks, Kim, for following up on this.

In the excel spreadsheet entitled "Learn-AU", we'd like to know what the following fields refer to: (1) query type; (2) user type; (3) date time; and (4) result. We'd also like to know what the various response options refer to. For example, there is a query type "detection browsing," but also a query type "email hit alert" – what do these and the other entries refer to? And in the "result" column, sometimes there is a numeric entry (e.g., 4 or 50) – what does this refer to? While some of these fields appear self-explanatory, we don't want to make any assumptions.

In the excel spreadsheet entitled "redacted LEARN audit report 2-28-2018", we'd like to know what the following fields refer to: (1) query type, (2) user name (3) user type; (4) plateID; (5) case number; (6) requestor; (7) date time; and (8) IP address. Further, like above, we'd like to know what the various entries under query type refer to.

Thank you and agency counsel again for being amenable to providing us with this information. Please let me know if you have any other questions.

Best, Vasudha

From: Robinson, Kimberly (USACAN) <Kimberly.Robinson3@usdoj.gov>
Sent: Tuesday, November 13, 2018 3:07 PM
To: Vasudha Talla <vtalla@aclunc.org>
Cc: Linda Lye <llye@aclunc.org>
Subject: RE: ACLU v. ICE - 18-cv-03050

Vasudha,

I hope all is well.

I am working on a JCMS draft and wanted to ask a quick question. With respect to the audit logs (Request 5), which appear in excel format, you had asked for, and the agency had agreed to provide, information about what is contained in the fields. If you can identify what information you specifically seek, I can get the request to agency counsel today and he can provide the information tomorrow. I'd like to both get this information and include this in the JCMS.

Thanks,
Kim

From: Vasudha Talla <vtalla@aclunc.org>
Sent: Monday, November 05, 2018 7:50 PM

To: Robinson, Kimberly (USACAN) <KRobinson@usa.doj.gov>

Cc: Linda Lye <llye@aclunc.org>

Subject: RE: ACLU v. ICE - 18-cv-03050

Thanks, Kim. We'll call you at your phone number on Friday at 4 p.m.

From: Robinson, Kimberly (USACAN) <Kimberly.Robinson3@usdoj.gov>

Sent: Monday, November 5, 2018 3:47 PM

To: Vasudha Talla <vtalla@aclunc.org>

Cc: Linda Lye <llye@aclunc.org>

Subject: RE: ACLU v. ICE - 18-cv-03050

Vasudha,

Thanks for your email and the letter and thank you for offering these times.

Let's plan to talk on Friday at 4. By that point, I will have talked through these issues with agency and will have more information to share.

I can be reached at the below number.

Best,
Kim



Kim Robinson | Assistant U.S. Attorney | Northern District of California |
450 Golden Gate Ave. | Box 36055 | San Francisco, CA 94102 |
T: 415.436.7298 | F: 415.436.6748

From: Vasudha Talla <vtalla@aclunc.org>

Sent: Monday, November 05, 2018 9:28 AM

To: Robinson, Kimberly (USACAN) <KRobinson@usa.doj.gov>

Cc: Linda Lye <llye@aclunc.org>

Subject: RE: ACLU v. ICE - 18-cv-03050

Dear Kim,

We received ICE's October 31st production on Friday. I'm attaching a letter setting forth the issues that we'd like to discuss during a meet-and-confer call. Linda and I are available for such a call on the following dates/times. Please let us know what works for you.

Wednesday, 11/7 – any time before noon

Thursday, 11/8 – 1-3 p.m.

Friday, 11/9 – 3-5 p.m.

Thanks, Vasudha

From: Robinson, Kimberly (USACAN) <Kimberly.Robinson3@usdoj.gov>
Sent: Thursday, November 1, 2018 10:16 AM
To: Vasudha Talla <vtalla@aclunc.org>
Cc: Linda Lye <llye@aclunc.org>
Subject: RE: ACLU v. ICE - 18-cv-03050

Vasudha,

Thank you for following up. Yes, they did meet the deadline.

ICE sent out the production yesterday to you via FedEx tracking number: 7736 1869 7583

Please also see the attached letter.

On an unrelated note, Ms. Lye, I wanted to congratulate you on your judicial appointment.

Please let me know if you have any additional questions.

Kim

From: Vasudha Talla <vtalla@aclunc.org>
Sent: Thursday, November 01, 2018 10:04 AM
To: Robinson, Kimberly (USACAN) <KRobinson@usa.doj.gov>
Cc: Linda Lye <llye@aclunc.org>
Subject: ACLU v. ICE - 18-cv-03050

Dear Kim,

I want to follow up on ICE's production of records in this FOIA case. Did ICE produce additional records by the October 31st deadline? I will keep an eye out for the records.

Thank you, Vasudha

Vasudha Talla, Staff Attorney
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Vasudha Talla

From: Robinson, Kimberly (USACAN) <Kimberly.Robinson3@usdoj.gov>
Sent: Friday, December 14, 2018 9:58 AM
To: Vasudha Talla
Cc: Sean Riordan
Subject: FW: ACLU v. ICE - 18-cv-03050, December Production
Attachments: LEARN_Hot-List_Records_Report_12-07-18_001-highlighted.xlsx; webex page.pdf

Vasudha,

Apologies. I omitted the attachments. Please see attached and the responses I just sent are again included below.

Kim

1. The December 7th production did not appear to contain the “Webex training” referenced on Page 2018-ICLI-00035 119. Was a search conducted for this training?
 - a. There are no Webex training documents. You log into a website, therefore the agency has no records to produce for this. See attached webex page clearly showing a link to a live training. More info on webex can be found [here](#). Webex is an online, live video conferencing/chat tool that training was provided on. There wouldn't be an agency record of that. We don't record online trainings and save them or something. We did search for webex, and that's how the attached document, among others was found and produced, but the training itself wasn't found because we don't have a file for that.
2. The December 7th production contained a number of “audit query reports” for the months of February through August 2018. These excel sheets contain two fields that did not appear on prior excel sheets produced during litigation. Can the agency identify what the fields (1) “query pars”, and (2) “reason” refer to?
 - a. Query pars = This stands for query parameters or the actual text of what was searched.
 - b. Reason = Per the SOW, a reason code is required in order for a user to conduct a search. The three options were provided by ICE.
3. The December 7th production does not appear to contain records identifying the names of hot lists created by ICE. My email of November 14th provided some details as to why we believe that ICE can create “hot lists” and how an audit report could be created to show any hot lists that ICE created. Could the agency describe the process by which it searched for hot lists?
 - a. We did produce an audit report [hot list] of all hot plates created by ICE. [attached]. This list was produced from the LEARN system the same way the audit lists above were produced. There isn't a “names of hot lists” report. We gave them every hot plate there is in the single hot list report. There aren't multiple “hot lists” with different names. There are hot plates, that can produced in a report, called a