



VIRGINIA MARIE RAYMOND  
LAWYER • ABOGADA

February 26, 2015

Karen Neuman  
Chief Privacy Officer/Chief FOIA Officer  
The Privacy Office  
U.S. Department of Homeland Security  
245 Murray Lane SW  
STOP-0655  
Washington, D.C. 20528-0655

RE: Freedom of Information Request #1: Indigenous Women and Children

Dear Chief FOIA Officer Neuman:

Attached please find our request for information concerning indigenous adults and children arrested by, or in the custody of, any unit of the U.S. Department of Homeland Security at any time from May 1, 2014, to the present (February 26, 2015). For the purpose of this request, the word 'indigenous' includes, 'indígena,' 'natural,' 'nativo,' 'Maya,' and 'Mayan.'

For purposes of this request, "indigenous children" means any minor child of any indigenous woman, as described above.

Please note that we are not asking for any information that would identify any individual person arrested or detained by the Department of Homeland Security. This is a request for aggregate data only.

Please do not make any copies costing over \$100.00 before we discuss and agree to pay any greater amount. Depending on the quantity and the nature of the information you are able to provide, we may either ask to come to a DHS office to inspect the materials you provide in response to this request, or ask that you forward the information to us.

Thank you in advance for your assistance.

Sincerely,

Victoria Rossi

Virginia Raymond

**Public information request – Indigenous Women, Children, and “Family Units”  
in Custody at the Karnes County Residential Center (hereafter “Karnes”),  
the South Texas Family Residential Center (hereafter “Dilley”),  
and the Artesia Family Residential Center (hereafter “Artesia”),  
from May 1, 2014, to the present (February 26, 2015)**

I. Indigenous Demographics

1) *Indigenous Apprehensions*

- A. How many women (age 19 and older at time of arrest) apprehended by U.S. Customs and Border Protection, any time between May 1, 2014 and the present, have identified as indigenous, i.e., how many women have self-identified using any of the following phrasing: indigenous, indígena, natural, native, nativo, Maya, Mayan.
- B. How many children (age 18 and younger at time of arrest) apprehended by U.S. Customs and Border Protection at any time between May 1, 2014 and the present, are identified as indigenous, i.e., how many have been identified with any of the following phrasing: indigenous, indígena, natural, native, nativo, Maya, Mayan? For the purposes of this request, “indigenous children” means any minor child of any indigenous woman, as described above.
- C. How many indigenous “family units” have been apprehended by U.S. Customs and Border Protection at any time between May 1, 2014 and the present?

2) *Indigenous Detention*

- D. How many women (age 19 and older at time of arrest) detained at Karnes, Dilley, and Artesia, any time between May 1, 2014 and the present, have identified as indigenous, i.e., how many women have self-identified using any of the following phrasing: indigenous, indígena, natural, native, nativo, Maya, Mayan.
- E. How many children (age 18 and younger at time of arrest) detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present, are identified as indigenous, i.e., how many have been identified with any of the following phrasing: indigenous, indígena, natural, native, nativo, Maya, Mayan? For the purposes of this request, “indigenous children” means any minor child of any indigenous woman, as described above.
- F. How many indigenous “family units” have been detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present?

## II. Indigenous Detention Outcomes

- A. What is the *median* detention time for the indigenous women who have been detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present? Please provide the same information for indigenous children.
- B. What is the *mean* detention time for the indigenous women detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present? Please provide the same information for indigenous children.
- C. What is the range in detention times for the indigenous women detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present? Please provide the same information for indigenous children.
- D. How many indigenous women detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present have been deported? Please provide the same information for indigenous children.
- E. How many indigenous women detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present have been released? Please provide the same information for indigenous children.
  - 1. How many indigenous women detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present have been released on their own recognizance? Please provide the same information for indigenous children.
  - 2. How many indigenous women detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present have been released on parole? Please provide the same information for indigenous children.
  - 3. How many indigenous women detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present have been released on bond? Please provide the same information for indigenous children.
  - 4. How many indigenous women detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present have been released on an Order of Supervision? Please provide the same information for indigenous children.
  - 5. How many indigenous women detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present have been released after being granted release from deportation and removal because of a grant of asylum, a withholding of removal, and/or protection under the Convention Against Torture? Please provide the same information for indigenous children.

F. How many indigenous women detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present have been transferred to another facility? Please provide the same information for indigenous children.

*1) Legal representation*

G. How many indigenous women detained at Karnes, Dilley, and Artesia at any time between May 1, 2014 and the present *have* received legal representation? Please provide the same information for indigenous children.

1. Of these women, how many have been deported? Please provide the same information for indigenous children.
2. Of these women, how many have been released? Please provide the same information for indigenous children.
  - a. Of the released indigenous women with legal representation, how many have been released on their own recognizance? Please provide the same information for indigenous children.
  - b. Of the released indigenous women with legal representation, how many have been released on parole? Please provide the same information for indigenous children.
  - c. Of the released indigenous women with legal representation, how many have been released on bond? Please provide the same information for indigenous children.
  - d. Of the released indigenous women with legal representation, how many have been released on bond? Please provide the same information for indigenous children.
  - e. Of the released indigenous women with legal representation, how many have been released on an Order of Supervision? Please provide the same information for indigenous children.
  - f. Of the released indigenous women with legal representation, how many have been released after being granted release from deportation and removal because of a grant of asylum, a withholding of removal, and/or protection under the Convention Against Torture? Please provide the same information for indigenous children.
3. Of these women, how many have been transferred to another facility? Please provide the same information for indigenous children.

- H. How many indigenous women detained at Karnes, Dilley, and Artesia at any time between May 1, 2014 and the present *have not* received legal representation? Please provide the same information for indigenous children.
1. Of these women, how many have been deported or removed? Please provide the same information for indigenous children.
  2. Of these women, how many have been released? Please provide the same information for indigenous children.
    - a. Of the released indigenous women without legal representation, how many have been released on their own recognizance? Please provide the same information for indigenous children.
    - b. Of the released indigenous women without legal representation, how many have been released on parole? Please provide the same information for indigenous children.
    - c. Of the released indigenous women without legal representation, how many have been released on bond? Please provide the same information for indigenous children.
    - d. Of the released indigenous women without legal representation, how many have been released on an Order of Supervision? Please provide the same information for indigenous children.
    - e. Of the released indigenous women without legal representation, how many have been released on an Order of Supervision? Please provide the same information for indigenous children.
    - f. Of the released indigenous women without legal representation, how many have been released after being granted release from deportation and removal because of a grant of asylum, a withholding of removal, and/or protection under the Convention Against Torture? Please provide the same information for indigenous children.
  3. Of these women, how many have been transferred to another facility? Please provide the same information for indigenous children.

### III. Language / Country of Origin / Literacy

#### 1) *Language*

- A. Of the women detained at Karnes, Dilley, and Artesia at any time between May 1, 2014 and the present, how many have reported that they do not speak Spanish?

Please provide the same information for indigenous children.

1. Of the women who do not speak Spanish, how many have received legal representation? Please provide the same information for indigenous children.
  - a. Of the women who do not speak Spanish and have received legal representation, how many have been deported? Please provide the same information for indigenous children.
  - b. Of the women who do not speak Spanish and have received legal representation, how many have been released? Please provide the same information for indigenous children.
    - i. Of these released women with legal representation, how many have been released on their own recognizance? Please provide the same information for indigenous children.
    - ii. Of these released women with legal representation, how many have been released on parole? Please provide the same information for indigenous children.
    - iii. Of these released women with legal representation, how many have been released on bond? Please provide the same information for indigenous children.
    - iv. Of these released women with legal representation, how many have been released on an Order of Supervision? Please provide the same information for indigenous children.
    - v. Of these released women with legal representation, how many have been released after being granted release from deportation and removal because of a grant of asylum, a withholding of removal, and/or protection under the Convention Against Torture? Please provide the same information for indigenous children.
  - c. Of the women who do not speak Spanish and have received legal representation, how many have been transferred to another facility? Please provide the same information for indigenous children.
2. Of the women who do not speak Spanish, how many have not received legal representation? Please provide the same information for indigenous children.
  - a. Of the women who do not speak Spanish and have received legal representation, how many have been deported? Please provide the same

information for indigenous children.

b. Of the women who do not speak Spanish and have not received legal representation, how many have been released? Please provide the same information for indigenous children.

i. Of these released women without legal representation, how many have been released on their own recognizance? Please provide the same information for indigenous children.

ii. Of these women without legal representation, how many have been released on parole? Please provide the same information for indigenous children.

iii. Of these women without legal representation, how many have been released on bond? Please provide the same information for indigenous children.

iv. Of these released women without legal representation, how many have been released on an Order of Supervision? Please provide the same information for indigenous children.

v. Of these released women without legal representation, how many have been released after being granted release from deportation and removal because of a grant of asylum, a withholding of removal, and/or protection under the Convention Against Torture? Please provide the same information for indigenous children.

c. Of the women who do not speak Spanish and have not received legal representation, how many have been transferred to another facility? Please provide the same information for indigenous children.

B. Of the women detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present, how many do not identify Spanish as their first language? Please provide the same information for indigenous children.

1. Of the women who do not report Spanish as their first language, how many have received legal representation? Please provide the same information for indigenous children.

a. Of the women who do not report Spanish as their first language and have received legal representation, how many have been deported/removed? Please provide the same information for indigenous children.

b. Of the women who do not report Spanish as their first language and have received legal representation, how many have been released? Please

provide the same information for indigenous children.

- i. Of these released women with legal representation, how many have been released on their own recognizance? Please provide the same information for indigenous children.
  - ii. Of these released women with legal representation, how many have been released on parole? Please provide the same information for indigenous children.
  - iii. Of these released women with legal representation, how many have been released on bond? Please provide the same information for indigenous children.
  - iv. Of these released women with legal representation, how many have been released on an Order of Supervision? Please provide the same information for indigenous children.
  - v. Of these released women with legal representation, how many have been released after being granted release from deportation and removal because of a grant of asylum, a withholding of removal, and/or protection under the Convention Against Torture? Please provide the same information for indigenous children.
- c. Of the women who do not report Spanish as their first language and have received legal representation, how many have been transferred to another facility? Please provide the same information for indigenous children.
2. Of the women who do not report Spanish as their first language, how many have not received legal representation? Please provide the same information for indigenous children.
- a. Of the women who do not report Spanish as their first language and have received legal representation, how many have been deported or removed? Please provide the same information for indigenous children.
  - b. Of the women who do not report Spanish as their first language and have not received legal representation, how many have been released? Please provide the same information for indigenous children.
    - i. Of these released women without legal representation, how many have been released on their own recognizance? Please provide the same information for indigenous children.
    - ii. Of these released women without legal representation, how many have been released on parole? Please provide the same information



for indigenous children.

- iii. Of these released women without legal representation, how many have been released on bond? Please provide the same information for indigenous children.
- iv. Of these released women without legal representation, how many have been released on an Order of Supervision? Please provide the same information for indigenous children.
- v. Of these released women without legal representation, how many have been released after being granted release from deportation and removal because of a grant of asylum, a withholding of removal, and/or protection under the Convention Against Torture? Please provide the same information for indigenous children.

- c. Of the women who do not report Spanish as their first language and have not received legal representation, how many have been transferred to another facility? Please provide the same information for indigenous children.

- C. Please list every language identified by each woman held in custody of DHS between May 1, 2014 and the present as her first or primary language. Please also list the number of women who identified each of these languages as her first or primary language. For example:

How many women reported Spanish\* as their first or primary language?  
How many women reported Portuguese\* as their first or primary language?  
How many women reported K'iché\* as their first or primary language?  
How many women reported Mam\* as their first or primary language?  
How many women reported Q'anjobal\* as their first or primary language?  
How many women reported Kakichel\* as their first or primary language?  
(\*However spelled.)

And so on, for every language identified as a first or primary language by women held in DHS custody between May 1, 2014 and the present. Please provide the same information for indigenous children.

- D. Please list every language identified by each woman held at Karnes, Dilley and Artesia any time between May 1, 2014 and the present as her first or primary language. Please also list:

- 1. The number of women who identified each of these languages as her primary or first language. (Please see above example in section C.)
- 2. The number of women who identified each of these languages as her first or

primary language at each facility. For example:

How many women reported Spanish\* as their first or primary language at Karnes?

How many women reported Spanish\* as their first or primary language at Dilley?

How many women reported Spanish\* as their first or primary language at Artesia?

(\*However spelled.)

And so on, for every language identified as a first or primary language by women detained at each facility. Please provide the same information for indigenous children.

## 2) *Countries of Origin*

- E. What countries of origin do the indigenous women detained at Karnes, Dilley, and Artesia (between May 1, 2014 to present) report? Please provide the same information for indigenous children.
1. How many indigenous women detained at Karnes, Dilley, and Artesia (May 1, 2014 – present) are from each of these countries? Please provide the same information for indigenous children.
  2. For each country of origin reported, what departments (i.e., provinces) do the indigenous women report that they are from? Please provide the same information for indigenous children.
  3. For each country of origin reported, what municipalities do the indigenous women report that they are from? Please provide the same information for indigenous children.

## 3) *Literacy*

- F. Of the indigenous women detained at Karnes, Dilley, and Artesia at any time between May 1, 2014 and the present, how many report that they do not know how to read in any language? Please provide the same information for indigenous children.

#### IV. General Demographics, Detention Outcomes, & Legal Representation at Karnes, Dilley, and Artesia

##### 1) *Demographics*

- A. How many women (age 19 and older at time of arrest) have been detained at Karnes, Dilley, and Artesia, any time between May 1, 2014 and the present?
- B. How many children (age 18 and younger at time of arrest) have been detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present?
- C. How many “family units” have been detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present?

##### 2) *Detention Outcomes*

- A. What is the *median* detention time for women who have been detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present? Please provide the same information for children.
- B. What is the *mean* detention time for women detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present? Please provide the same information for children.
- C. What is the range in detention times for women detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present? Please provide the same information for children.
- D. How many women detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present have been deported? Please provide the same information for children.
- E. How many women detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present have been released? Please provide the same information for children.
  - 1. How many women detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present have been released on their own recognizance? Please provide the same information for children.
  - 2. How many women detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present have been released on parole? Please provide the same information for children.
  - 3. How many women detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present have been released on bond? Please

provide the same information for children.

4. How many women detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present have been released on an Order of Supervision? Please provide the same information for children.
5. How many women detained at Karnes, Dilley, and Artesia any time between May 1, 2014 and the present have been released after being granted release from deportation and removal because of a grant of asylum, a withholding of removal, and/or protection under the Convention Against Torture? Please provide the same information for children.

### 3) *Legal representation*

- A. How many women detained at Karnes, Dilley, and Artesia at any time between May 1, 2014 and the present *have* received legal representation? Please provide the same information for children.
  1. Of these women, how many have been deported? Please provide the same information for children.
  2. Of these women, how many have been released? Please provide the same information for children.
    - a. Of the released women with legal representation, how many have been released on their own recognizance? Please provide the same information for children.
    - b. Of the released women with legal representation, how many have been released on parole? Please provide the same information for children.
    - c. Of the released women with legal representation, how many have been released on bond? Please provide the same information for children.
    - d. Of the released women with legal representation, how many have been released on bond? Please provide the same information for children.
    - e. Of the released women with legal representation, how many have been released on an Order of Supervision? Please provide the same information for children.
    - f. Of the released women with legal representation, how many have been released after being granted release from deportation and removal because of a grant of asylum, a withholding of removal, and/or protection under the Convention Against Torture? Please provide the same information for children.

3. Of these women, how many have been transferred to another facility?  
Please provide the same information for children.
- B. How many women detained at Karnes, Dilley, and Artesia at any time between May 1, 2014 and the present *have not* received legal representation? Please provide the same information for children.
1. Of these women, how many have been deported or removed? Please provide the same information for children.
  2. Of these women, how many have been released? Please provide the same information for children.
    - a. Of the released women without legal representation, how many have been released on their own recognizance? Please provide the same information for children.
    - b. Of the released women without legal representation, how many have been released on parole? Please provide the same information for children.
    - c. Of the released women without legal representation, how many have been released on bond? Please provide the same information for children.
    - d. Of the released women without legal representation, how many have been released on an Order of Supervision? Please provide the same information for children.
    - e. Of the released women without legal representation, how many have been released on an Order of Supervision? Please provide the same information for children.
    - f. Of the released women without legal representation, how many have been released after being granted release from deportation and removal because of a grant of asylum, a withholding of removal, and/or protection under the Convention Against Torture? Please provide the same information for children.
  3. Of these women, how many have been transferred to another facility?  
Please provide the same information for children.