



February 2, 2022

U.S. Immigration and Customs Enforcement
Freedom of Information Act Office
500 12th Street SW, Stop 5009
Washington, D.C. 20536-5009

RE: FOIA Request for Records Related to the Expansion of Folkston ICE Processing Center Operated by Private Prison Company GEO Group

Dear Freedom of Information Officer:

This letter is a request pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, by Sur Legal Collaborative (“Sur Legal”), Project South, Asian Americans Advancing Justice-Atlanta (“Advancing Justice-Atlanta”), Georgia Latino Alliance for Human Rights (“GLAHR”), Women Watch Afrika, and the Party for Socialism and Liberation. Sur Legal, Project South, Advancing Justice-Atlanta, the GLAHR, Women Watch Afrika, the Party for Socialism and Liberation (“PSL”), Black Alliance for Immigrant Justice (“BAJI”), and Southern Poverty Law Center (“SPLC”) seek records from U.S. Immigration and Customs Enforcement (“ICE”) related to the confinement of people by ICE at the Folkston ICE Processing Center (“FIPC”), which is housed in the same facility as D. Ray James, a former Bureau of Prisons facility prison in Folkston, GA, both of which are operated by the for-profit company Geo Group. We also seek expedited processing of this request and a fee waiver. *See* 5 U.S.C. §§ 552(a)(6)(E), 552(a)(4)(A)(iii).

Definitions

“Records”—all records or communications preserved in electronic or written form, including but not limited to: text communications between phones or other electronic devices (including but not limited to communications sent via SMS or other text, Blackberry Messenger, iMessage, WhatsApp, Facebook, Signal, Gchat, Twitter direct message, Teams, or similar form of communication), including those sent through personal devices or accounts; e-mails (including those in personal accounts); images, video, and audio, including that recorded on cell phones; voicemail messages; social-media posts; minutes or notes of meetings and phone calls; faxes; documents; data; correspondence; letters; messages; notes; contracts or agreements; memoranda of understanding; files; forms, including but not limited to I-205 forms, I-213 forms, and I-247 or I-247-related forms; logs; records; guidance; guidelines; formal and informal presentations; evaluations; audits; investigations; reviews; studies; reports; critiques; analyses; internal memoranda; legal opinions; orders; directives; instructions; training materials; criteria; standards; specifications; rules; instructions; manuals; advisories; bulletins; alerts; updates; reports; protocols; procedures; policies; or other communications.

“DHS” includes any sub-agency within the Department of Homeland Security, including Immigration and Customs Enforcement (“ICE”), Customs and Border Protection (“CBP”), and U.S. Border Patrol.

Records Requested

Specifically, we seek copies of the following records related to the confinement of people under the authority of DHS at FIPC:

1. agreements between DHS or any of its component agencies and the GEO Group or any of its subsidiaries concerning FIPC;
2. modifications to or the cancellation of any agreements between DHS or any of its component agencies and the GEO Group or any of its subsidiaries concerning the Folkston ICE Processing Center;
3. agreements, modifications, and cancellations to agreements between DHS and Charlton County – including but not limited to the Memorandum of Understanding that was approved at the January 7, 2021 Charlton County Board of Commissioners Meeting;
4. communications to or from DHS or any of its component agencies and municipal, county, state, or federal officials concerning FIPC -- including but not limited to elected officials and their staff – plans, proposals, inquiries, explorations, and/or investigations about increasing detainee capacity or the number of beds at FIPC.
5. guidance, guidelines, rules, directives, policies, procedures, standards, or trainings pertaining to visitation, legal visitation, and detainee transfers at FIPC;
6. any communications, agreements, guidance, guidelines, rules, directives, policies, procedures, standards, or trainings regarding staffing levels or increasing of medical staff, social workers, or other staff of ICE or ICE Health Service Corps related to the expansion of FIPC to comply with the ICE National Detention Standards (Medical Care),¹ as well as any agreements with outside facilities, hospitals, or medical treatment providers or contractors;
7. any communications, agreements, guidance, guidelines, rules, directives, policies, procedures, standards, protocols or trainings related to treatment and prevention of Covid-19—including but not limited to access to testing, vaccines and boosters, as well as other safety protocols related to the expansion of the FIPC to comply with CDC guidelines for carceral facilities.²

Request for Expedited Processing

Sur Legal, Project South, Advancing Justice-Atlanta, GLAHR, Women Watch Afrika, PSL and SPLC request Track 1 expedited processing of this Request pursuant to 5 U.S.C. § 552(a)(6)(E) and 6 C.F.R. § 5.5(e). There is a “compelling need” for these records, as defined in the statute and its implementing regulations, because the records and information requested are “urgen[tly]” needed by Sur Legal, Project South, Advancing Justice-Atlanta, GLAHR, Women Watch Afrika, PSL and SPLC

¹ https://www.ice.gov/doclib/detention-standards/2019/4_3.pdf.

² <https://www.cdc.gov/coronavirus/2019-ncov/community/correction-detention/guidance-correctional-detention.html>

organizations primarily engaged in disseminating information, “to inform the public about an actual or alleged federal government activity.” 6 C.F.R. § 5.5(e)(1)(ii); *see also* 5 U.S.C. § 552(a)(6)(E)(v)(II).

Sur Legal, Project South, Advancing Justice-Atlanta, the Georgia Latino Alliance for Human Rights, Women Watch Afrika, the Party for Socialism and Liberation, and the Southern Poverty Law Center are organizations primarily engaged in disseminating information to inform the public about actual or alleged federal government activity.

Sur Legal is “primarily engaged in disseminating information” within the meaning of the statute and its implementing regulations. *See* 5 U.S.C. § 552(a)(6)(E)(v)(II); *see also* 6 C.F.R. § 5.5(e)(1)(ii). Sur Legal’s mission is to advance movements for immigrant and worker rights by providing education and legal support to communities, grassroots groups, and legal advocates to promote an end to labor abuses against workers, ICE detention and illegal deportations, and the prison industrial complex and the police state. Sur Legal’s ultimate goal is to democratize legal knowledge so that immigrant and working-class communities are empowered with the resources necessary to advocate for their rights and continue to lead us in the struggle for a more just society. Sur Legal’s primary activities are unearthing, compiling, and presenting information to communities engaged in movements to advance immigrant and worker rights, including communities engaged in campaigns to shut down detention centers like FIPC and prevent deportations by ICE. Sur Legal staff regularly appear in the news regarding these types of campaigns.³ Since its founding less than a year ago, Sur Legal has regularly published information, commentary, and analysis of developments in policies affecting workers and immigrants through multiple platforms, including Twitter, Facebook, and Instagram.

Project South is “primarily engaged in disseminating information” within the meaning of the statute and its implementing regulations. *See* 5 U.S.C. § 552(a)(6)(E)(v)(II); *see also* 6 C.F.R. § 5.5(e)(1)(ii). Project South, founded as the Institute to Eliminate Poverty & Genocide in 1986, is a non-profit organization based in Atlanta, Georgia. Project South’s work is rooted in the legacy of the Southern Freedom Movement and has a mission of cultivating strong social movements in the South. One of Project South’s primary work areas is educating the public with know-your-rights workshops and releasing toolkits for advocacy and organizing. These and other materials are available through Project South’s website, <https://projectsouth.org/>, which addresses the issues on which the organization works. In addition, Project South regularly issues press releases, has an active social media presence with thousands of followers, and produces periodicals that reach members with education, organizing updates, and consciousness-raising political analysis on poverty, race, global struggles, and

³ Jeff Amy, “Advocates: Workers here illegally may shy from investigators,” Associated Press (February 1, 2021), available at: <https://apnews.com/article/atlanta-arrests-georgia-us-news-immigration-f95fb731c42f604de6b5c0b6b9f1d069>; Roxanne Scott, “After Chemical Leak At North Georgia Plant, Immigrants Rights Groups Call For More Worker Protections,” WABE (Feb. 1, 2021), available at: <https://apnews.com/article/atlanta-arrests-georgia-us-news-immigration-f95fb731c42f604de6b5c0b6b9f1d069>; Roxanne Scot, “Ga. Advocates Support Biden’s Immigration Plans, Want To See More,” WABE (Jan. 22, 2021), available at: <https://www.wabe.org/some-georgians-support-bidens-immigration-plans-want-to-see-more/>; Lautaro Grinspan, “For immigration advocates, end of ICE detention in Irwin County is a bittersweet victory,” The Atlanta Journal-Constitution (Sept. 23, 2021), available at: <https://www.ajc.com/news/for-immigration-advocates-end-of-ice-detention-in-irwin-county-is-a-bittersweet-victory/YQPE3XUHBZfJ7HIN3OPNLEUAGE/>.

youth realities. Project South also produces community-based reports to share knowledge, increase access to movement histories, and amplify movement victories.

Advancing Justice-Atlanta is “primarily engaged in disseminating information” within the meaning of the statute and its implementing regulations. See 5 U.S.C. § 552(a)(6)(E)(v)(II); see also 6 C.F.R. § 5.5(e)(1)(ii). Advancing Justice-Atlanta works to defend, protect, and advance the rights of AAPIs and other immigrants at all levels of government through civic engagement and organizing, policy advocacy, immigration legal services, and impact litigation. It aims to build a sustainable, community-centered movement to affect deep, long-term shifts in power, behavior, and culture through community-building and education, leadership development, issue-based and electoral campaigns, and multicultural, multiracial coalition building. In its immigrant justice work, Advancing Justice-Atlanta fights to free people from immigration detention and advocates against unjust, oppressive laws and policies. Advancing Justice-Atlanta uses tools like community education, policy advocacy, and free immigration legal workshops to advance community-driven social and political movements, seeking to empower immigrants by disseminating information that impacts the communities it serves, including information about immigration detention in Georgia. Advancing Justice-Atlanta staff regularly appear in the news regarding these types of campaigns. Advancing Justice-Atlanta has regularly published information, commentary, and analysis of developments in policies affecting immigrants detained in Georgia through multiple platforms, including Twitter, Facebook, and Instagram. At the heart of all of its work is the fight to protect and empower immigrants, refugees, and people of color.

The Georgia Latino Alliance for Human Rights (“GLAHR”) is “primarily engaged in disseminating information” within the meaning of the statute and its implementing regulations. See 5 U.S.C. § 552(a)(6)(E)(v)(II); see also 6 C.F.R. § 5.5(e)(1)(ii). GLAHR is a non-profit organization based in Atlanta, Georgia that works to educate, organize and cultivate leadership within the Latinx immigrant population of Georgia. More broadly, GLAHR works to advocate for and inform immigrant communities of color, many of whom come from low income, mixed-status families that would be directly impacted by a prospective expansion of the Folkston ICE Processing Center. GLAHR conducts weekly community meetings with its member constituency to share information regarding local and national immigration policy developments and organize grassroots campaigns related to issues that implicate the Latinx immigrant population of Georgia. GLAHR has an active social media presence on Twitter, Instagram, and Facebook, and an email newsletter used to educate its members and the broader immigrant community about immigration policy developments and its related campaigns. By sharing this information and cultivating leadership, GLAHR seeks to build political power within the Latinx immigrant community of Georgia.

Women Watch Afrika is “primarily engaged in disseminating information” within the meaning of the statute and its implementing regulations. See 5 U.S.C. § 552(a)(6)(E)(v)(II); see also 6 C.F.R. § 5.5(e)(1)(ii). Women Watch Afrika, (WWA) is a non-profit, grassroots, international, national, and local social justice organization focused on the elimination of all forms of discrimination against women and girls, the promotion of social and economic development and health equity of women, and the acculturation of immigrants and refugees (men and women) arriving to the United States from 23 African nations. In line with its goal, Women Watch Afrika provides Social Services; Civic Engagement; Voter Education and Voter Registration; Advocacy; Health and Legal Education; Know

Your Rights workshops; Citizenship Preparation; Legal Services; Domestic Violence/FGM Prevention classes; Reproductive Rights Education; Language Justice, and Advocates against unjust, discriminatory laws that affect our community. Women Watch Afrika conducts weekly Community Radio In-Language Outreach, WhatsApp Outreach, and has an active social media presence on its website, Twitter, and Facebook to educate the immigrant community and the community at large about immigration policy and laws, and community concerns. It was established in November 1994 in Dakar, Senegal; and was established in Atlanta, GA in 1997 to address the unmet needs of underserved African refugee and immigrant population in Metro Atlanta and is located in DeKalb County that is home to most low-income African Americans and underserved refugee and immigrant populations.

The Party for Socialism and Liberation is comprised of leaders and activists, workers and students, of all backgrounds. Organized in branches across the country, the PSL brings together a new generation of revolutionaries alongside veterans of the people's movements with decades of experience. The PSL is deeply involved in a wide range of struggles, from local battles over affordable housing and racist police brutality, to the fight for a higher minimum wage and union rights, to the global issues of imperialist war and environmental destruction. Our mission is to link the everyday struggles of oppressed and exploited people to the fight for a new world.

The Southern Poverty Law Center ("SPLC") is a non-profit, public interest legal and advocacy organization specializing in civil rights and public interest litigation. SPLC is a catalyst for racial justice in the South and beyond, working in partnership with communities to dismantle white supremacy, strengthen intersectional movements, and advance the human rights of all people. SPLC's diverse issue areas include economic justice, immigrant rights, criminal justice reform, and hate & extremism. One of SPLC's primary activities is the release of frequent publications, intelligence reports, and press releases regarding all of the Center's issues. These and other materials are available through SPLC's website, <https://www.splcenter.org/>. SPLC staff members often serve as sources for journalists and media outlets, including on issues related to racial justice, racial discrimination, and immigrant rights. In addition, SPLC hosts a blog called Hatewatch which monitors and exposes the activities of the American radical right and has a strong social media presence with thousands of followers to communicate frequent updates on recent projects and issues of social justice.

The records and information sought are urgently needed to inform the public about actual or alleged federal government activity.

There is a compelling and urgent need to inform the public about the current status of the federal government's negotiations and agreements regarding the expansion of FIPC. Thus far, ICE has refused to publicly announce expansion plans, yet this decision has substantial national implications with respect to government integrity, treatment of noncitizens, and public health during a global pandemic.

During his campaign, President Biden pledged to close private prisons that caged people in both criminal and ICE custody: "that the federal government should not use private facilities for any detention, including detention of undocumented immigrants."⁴ However, once becoming president,

⁴ The Biden Plan for Strengthening America's Commitment to Justice, available at: <https://joebiden.com/justice/>.

Biden limited his Executive Order to ending private prison contracts for criminal custody, specifically excluding immigration detention.⁵ Since then, there has been a troubling increase—rather than decrease—in the number of immigrants in ICE custody, the vast majority of whom are in private facilities.⁶ In September 2021, 79% of immigrants in ICE custody were detained in privately-run facilities, despite them making up only 10% of the jails and prisons nationwide.⁷ Information regarding the Biden administration’s plans to further expand FIPC are critical for the public’s awareness of the ongoing and highly problematic use of privately-run facilities to cage immigrants. Further, it will shed light on the false distinction between so-called “civil” immigration detention and criminal custody if the government is indeed planning to utilize D. Ray James—a former federal prison—to detain immigrants in the same conditions.

ICE began using FIPC to cage migrants in 2016, and has already expanded it from 780 beds to 1,118 in 2017.⁸ Since its inception, it has been known for its woeful lack of access to counsel due to its remote location in Charlton County in South Georgia, with a population of approximately 12,000.⁹ Combining the additional 2,067 beds at D. Ray James,¹⁰ it would allow for the unprecedented detention of over 3,000 migrants and *would make FIPC the largest immigration detention facility in the nation.*¹¹

Further, a significant number of FIPC’s population is a result of ICE transferring individuals previously detained at the notorious Irwin County Detention Center where nonconsensual gynecological procedures were performed on immigrant women,¹² and which the Biden

⁵ Exec. Order No. 14006: Reforming Our Incarceration System to Eliminate Privately Operated Criminal Detention Facilities, 86 Fed. Reg. 7483 (effective Jan. 29, 2021), available at: <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/26/executive-order-reforming-our-incarceration-system-to-eliminate-the-use-of-privately-operated-criminal-detention-facilities/>.

⁶ Report: “Broken Promises: Limits of Biden’s Executive Order on Private Prisons,” Project South & Detention Watch Network (November 23, 2021), available at: https://www.detentionwatchnetwork.org/sites/default/files/reports/Broken%20Promises_DWN%20and%20Project%20South_Final_11.23.21.pdf.

⁷ Report: “More of the Same: Private Prison Corporations and Immigration Detention under the Biden Administration,” American Civil Liberties Union, (October 5, 2021), available at: <https://www.aclu.org/news/immigrants-rights/more-of-the-same-private-prison-corporations-and-immigration-detention-under-the-biden-administration>.

⁸ Report: “No end in Sight,” Southern Poverty Law Center (2018), available at: https://www.splcenter.org/sites/default/files/leg_ipp_no_end_in_sight_2018_final_web.pdf.

⁹ *See id.*; Charlton County Census Data, available at: <https://www.census.gov/quickfacts/fact/table/charltoncountygeorgia/PST045221>.

¹⁰ <https://www.geogroup.com/facilitydetail/facilityid/45>

¹¹ Statement of 21 Immigration Rights Groups: “Biden to Break More Promises by Making Georgia the Prison Capital of the U.S. with GEO Mega Immigrant Detention Facility” (December 17, 2021), available at: <https://www.advancingjustice-atlanta.org/news/closefolkston>.

¹² Alan Judd, “Georgia ICE detainees tell congressional delegation of unwanted gynecological procedures,” The Atlanta Journal-Constitution (Sept. 26, 2020), available at: <https://www.ajc.com/news/georgia-news/ga-ice-detainees-tell-congressional-delegation-of-unwanted-gynecological-procedures/M5INTOHE7FFB7OVE7OJXYE74MY/>; “Women Detainees Describe Irwin County Detention Center Conditions As ‘Torture’ During Congressional Visit,” BELatina (Sept. 29, 2020), available at: <https://belatina.com/congress-visit-irwin-county-detention-center-human-rights-violations/>.

Administration agreed to close as a result of public pressure and advocacy.¹³ Despite ultimately ending its contract at Irwin, ICE refused to release the remaining migrants detained there, instead transferring them to other facilities, including FIPC.¹⁴ ICE's sinister history of abuse and mistreatment of migrants in Georgia—including Stewart Detention Center, another privately run facility that continues to operate despite numerous deaths from both Covid-19 and other causes—¹⁵starkly illustrates the public need to know its plans to expand yet another facility in this state.

Both FIPC and the corporation who runs it, GEO Group, have a long history of mistreatment of migrants. In 2020, FIPC was specifically the subject of a lawsuit alleging failure to protect migrant detainees from Covid-19 infections.¹⁶ FIPC detainees must also work for as little as \$2.50 per hour to afford basic necessities like food and toiletries.¹⁷ These human rights abuses are consistent with GEO Group's track record at other facilities it operates. A federal government investigation revealed the lack of adequate medical care and incompetent staff caused the death of numerous migrant detainees housed within GEO Group facilities.¹⁸ Most recently, GEO Group was found liable in Washington

¹³ Alex Woodward, "I agree with you, gimme another five days': Biden tells hecklers he wants to close private prisons at Georgia rally," *The Independent* (April 30, 2021), available at:

<https://www.independent.co.uk/news/world/americas/us-politics/biden-georgia-rally-speech-protest-b1839959.html>;

Brittany De Lea, "Biden heckled in Georgia over private detention centers," *Fox News* (April 29, 2021), available at: <https://www.foxnews.com/politics/biden-heckled-rally-georgia>.

¹⁴Jeremy Redmon, "All immigrant detainees moved out of South Georgia jail," *Atlanta Journal-Constitution* (September 4, 2021), available at: <https://www.ajc.com/news/all-ice-detainees-moved-out-of-south-georgia-jail/XJ6XIUTVBFCN3IALTUCUFUNBX4/>.

¹⁵Jeremy Redmond, "Fourth ICE detainee dies from Covid-19 in southwest Georgia," *Atlanta Journal Constitution* (January 31, 2021), available at: <https://www.ajc.com/news/fourth-ice-detainee-dies-from-covid-19-in-southwest-georgia/TNPDEQCTD5AJNEJG3AB5UODNGQ/>; Jose Olivares, "ICE Review of Immigrant's Suicide Finds Falsified Documents, Neglect, and Improper Confinement," *The Intercept* (October 23, 2021), available at: <https://theintercept.com/2021/10/23/ice-review-neglect-stewart-suicide-corecivic/>

¹⁶ See *Benavides, Et Al. v. Patrick Garland, Et Al.* (S.D.G.A. 2020), available at:

https://www.splcenter.org/seeking-justice/case-docket/jenner-benavides-et-al-v-patrick-gartland-et-al?link_id=13&can_id=2db70c571534e582675cd012e1e44883&source=email-asian-american-voters-lawsuit-against-sb-202-moves-forward-2&email_referrer=email_1388368&email_subject=biden-to-break-more-promises-by-making-georgia-the-private-prison-capital-of-the-us-with-geo-mega-immigrant-detention-center

¹⁷ Liz Vinson, "Abused and Locked Up after A Lifetime of Pain," *Southern Poverty Law Center* (December 20, 2019), available at: https://www.splcenter.org/attention-on-detention/abused-and-locked-after-lifetime-pain?link_id=14&can_id=2db70c571534e582675cd012e1e44883&source=email-asian-american-voters-lawsuit-against-sb-202-moves-forward-2&email_referrer=email_1388368&email_subject=biden-to-break-more-promises-by-making-georgia-the-private-prison-capital-of-the-us-with-geo-mega-immigrant-detention-center.

¹⁸ U.S. House of Representatives Staff Report, "The Trump Administration's Mistreatment of Detained Immigrants: Deaths and Deficient Medical Care by For-Profit Detention Contractors" (Sept. 2020), available at:

<https://oversight.house.gov/sites/democrats.oversight.house.gov/files/2020-09-24.%20Staff%20Report%20on%20ICE%20Contractors.pdf>.

state for paying detained workers \$1 per day instead of minimum wage and now owes them back wages.¹⁹

Finally, as the global pandemic rages on and given GEO Group's history, the expansion of FIPC would unquestionably put additional immigrants at risk of contracting Covid-19 and is a national public health concern. *As of 2022, cases of Covid-19 in immigration detention facilities have increased 520%.*²⁰ Besides the overall challenges rural communities and hospitals have faced, Charlton County has been especially hard hit; indeed, *during the Delta variant's surge last summer, Charlton County had the highest Covid rate in the nation.*²¹ Expansion of immigration detention facilities under these circumstances is unconscionable and is a matter of government integrity that affects the public's confidence in its government.²² Thus, the consequences of the expansion would compromise the recognized public health concern of operating a congregate facility with high rates of transmission of communicable diseases amid an ongoing global pandemic in a rural community like Charlton County *that does not have a single hospital.*²³

Request for Waiver or Limitation of Fees

The Requesters also seek a full fee waiver on the grounds that disclosure of the requested records is in the public interest and is "likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requestor." 5 U.S.C. § 552(a)(4)(A)(iii). As set forth, this request aims at furthering public understanding of government conduct, specifically, what agreements and documents relate to expansion of FIPC, and if and when those agreements will come to an end. To the Requesters' knowledge, the information requested regarding such agreements is not currently available to the public. Thus, the records' disclosure by definition will contribute significantly to the public's understanding of whether an expansion of FIPC to cage nearly 2,000 additional migrants is in fact underway.

Thank you for your consideration of this request. If this request is denied in whole or in part, we ask that the government justify all redactions by reference to specific FOIA exemptions. We expect the government to release all segregable portions of otherwise exempt material. We reserve the right

¹⁹ Gene Johnson, "GEO ordered to pay \$23.2M in detainee minimum wage cases," AP News (November 2, 2021), available at: <https://apnews.com/article/immigration-business-lawsuits-washington-minimum-wage-85ddafe57d77f80e8c0f5359ca8e645d>.

²⁰ "Coronavirus infections inside U.S. immigration detention centers surge by 520% in 2022," CBS News (January 14, 2022), available at: <https://www.cbsnews.com/news/immigration-detention-covid-cases-surge>.

²¹ Gordon Jackson, "South Georgia counties in the COVID-19 danger zone," The Brunswick News, (July 29, 2021), available at: https://thebrunswicknews.com/news/local_news/south-georgia-counties-in-the-covid-19-danger-zone/article_9cfef2a3-c3eb-52c2-9b5c-d9ec47267536.html/.

²² Grant Blankenship, "Health Officials Blame Prison for COVID Outbreak in Rural Southeast Georgia," GPB News (September 16, 2020), available at: <https://www.gpb.org/news/2020/09/16/health-officials-blame-prison-for-covid-outbreak-in-rural-southeast-georgia>.

²³ Charlton County's only hospital closed in 2013, leaving the closest hospital over 30 miles away with just 40 beds for emergency care. "Latest Hospital closing a blow to rural residents," Georgia Health News (August 26, 2013), available at: <http://www.georgiahealthnews.com/2013/08/latest-hospital-closing-blow-rural-residents/>; see also <https://www.sghs.org/About-Us/Camden-Campus.aspx>.

to appeal a decision to withhold any information or to deny expedited processing or a waiver of fees. We look forward to your response to our request for expedited processing within 10 business days, as required under 5 U.S.C. § 552(a)(6)(E)(ii)(I). Notwithstanding our request for expedited processing, we alternatively look forward to your reply to this request within 20 business days, as required under 5 U.S.C. § 552(a)(6)(A)(I).

We prefer to receive the records electronically via email to lynn@surlegal.org, laura@surlegal.org, azadeh@projectsouth.org, myoon@advancingjustice-atlanta.org, anicholls@glahr.org, natalievillasana1@gmail.com and gracie.willis@splcenter.org. Finally, please notify us in advance if the cost of photocopying the documents requested exceeds \$100.

Sincerely,



Lynn Damiano Pearson
Co-Founder
Sur Legal Collaborative



Laura Rivera
Co-Founder
Sur Legal Collaborative



Meredyth Yoon
Litigation Director
Asian Americans Advancing Justice-Atlanta



Azadeh Shahshahani
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Adelina Nicholls
Executive Director
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Amy Zeidan
Co-Director
Georgia Human Rights Clinic



Glory Kilanko
Founder & CEO
Women Watch Afrika



Gabriel Sanchez
Economic Justice Organizer
Poder Latinx



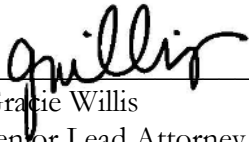
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