

Via Electronic Mail -
lowens@valverdecountry.texas.gov

Val Verde Office of the County Judge
c/o Lewis Owens
400 Pecan Street
Del Rio, TX 78840

Via Electronic Mail -
d.guzman@valverdecountry.texas.gov

Val Verde County Sheriff's Office
c/o Dora Guzman
295 FM 2523, Hamilton Road
Del Rio, TX 78840

Via Electronic Mail -
norma.deluna@cityofdelrio.com

City of Del Rio
c/o City Clerk Norma De Luna
109 West Broadway
Del Rio, TX 78840

Via Electronic Mail -
norma.deluna@cityofdelrio.com

Mayor of Del Rio
c/o City Clerk Norma De Luna
109 West Broadway
Del Rio, TX 78840

Via Electronic Mail -
norma.deluna@cityofdelrio.com

Del Rio Police Department
c/o City Clerk Norma De Luna
109 West Broadway
Del Rio, TX 78840

October 1, 2021

Re: Public Information Request

To whom it may concern:

Haitian Bridge Alliance, UndocuBlack Network, and African Communities Together (the Co-Requesters), represented by Justice Action Center, Haitian Bridge Alliance, Innovation Law Lab, Robert F. Kennedy Human Rights, and Texas Civil Rights Project, hereby submit this records request pursuant to Texas Public Information Act, Chapter 552 of the Texas Government Code.

Due to the violence and vitriol targeted against Black migrants, the Co-Requesters urgently seek information on the actions taken by Texas state and local officials and law enforcement in connection with the treatment of migrants in Del Rio, including regarding any arrests or detention of any migrants.

Specifically, we request all records¹ created or modified since September 1, 2021:

1. discussing or reflecting any plans or course of action for responding to the arrival or presence of migrants in or around Del Rio, Texas, and any actions taken in response to the arrival of such migrants (the “Del Rio Response”), including but not limited to:
 - a. the Local Disaster Declaration issued by the Mayor of Del Rio on September 17, 2021;
 - b. Governor Abbott’s request for a presidential disaster declaration and related federal assistance transmitted September 20, 2021;
 - c. any use of state or local law enforcement or the Texas National Guard to close any Texas port of entry;
 - d. closure of the international bridge between Del Rio and Ciudad Acuna;
 - e. statements on the use of horseback law enforcement practices;
 - f. the deployment of federal, state, or local law enforcement officers in or around Del Rio;
 - g. the use of vehicles to create a barricade along the U.S.-Mexico border; and
 - h. arrests of migrants crossing at or near Del Rio, Val Verde County who have been alleged to have violated state or local laws, including but not limited to trespass.

2. reflecting any policies, procedures, instructions, or directives that concern the Del Rio Response.

3. reflecting communications discussing or reflecting the Del Rio Response between your Agency and any of the following individuals or agencies:
 - a. Governor Abbott or any employee of the Office of the Governor of Texas;
 - b. any Texas state official or agency;
 - c. any Val Verde County official or agency;
 - d. any Del Rio city official or agency;
 - e. any Texas local official or agency;
 - f. any U.S. federal government official or agency;
 - g. any Mexican federal or local government official or agency;
 - h. any Haitian government official or agency;
 - i. any government official or agency of another State;
 - j. Stephen Miller;
 - k. any employee, officer, agent, board member, or contractor of America First Legal; and
 - l. any employee, officer, agent, board member, or contractor of the Immigration Reform Law Institute (IRLI).

4. all reports and statistics, including data in any database, showing any of the following:

¹ For the purposes of this request, “records” are collectively defined to include the definition of public information and the manners of maintaining that information contained in Texas Government Code § 552.002.

- a. the number of noncitizens arrested and taken into state or local law enforcement custody in Val Verde County by state law enforcement between September 1 and October 1, 2021.
 - b. the number of noncitizens arrested and taken into custody in Val Verde County by local law enforcement between September 1 and October 1, 2021.
5. for persons enumerated in the response to Request No. 4 above, all reports and statistics showing generally and anonymously:
- a. their age, nationality, and state of residence;
 - b. location of detention;
 - c. whether they have been charged with any state crime and what the charges are;
 - d. whether any bail amount was set and/or paid and how much;
 - e. the status of appointment of criminal defense counsel; and
 - f. the status of any state criminal proceeding against them, including the arrest records, probable cause affidavits, date of any arraignment, plea, or conviction.

In the interest of open government, please be mindful of your duty to make a good-faith effort to relate these requests to any information that you hold. I also ask that, in accordance with the law, you promptly produce the information we have requested. If you expect that fulfilling this request will take longer than ten days, please inform me when I can expect copies of these records. As you are aware, the Texas Local Government Code dictates that a local government record subject to a request under the Texas Public Information Act may not be destroyed until the request is resolved.

Please waive the fees for this request, as it is made for public and non-commercial purposes. Tex. Gov't Code § 552.267.

Haitian Bridge Alliance. Haitian Bridge Alliance is a grassroots and community-based non-profit organization with federal 501(c)(3) status that advocates for fair and humane immigration policies and provides migrants and immigrants with humanitarian, legal, and social services, with a particular focus on Black migrants, the Haitian community, women and girls, LGBTQIA+ individuals, and survivors of torture and other human rights abuses. HBA will also work with other non-profit and advocacy organizations to ensure that the information obtained through these Requests is distributed to affected populations and the public at large.

UndocuBlack Network. The UndocuBlack Network is a fiscally sponsored project of [the Praxis Project](#), a 501(c)(3) nonprofit organization. The UndocuBlack Network (UBN) serves as a multigenerational network of currently and formerly undocumented Black people that aims to foster community, facilitate access to resources, and transform the realities of undocumented Black people, so that we are thriving and living our fullest lives.

African Communities Together. African Communities Together (ACT) is an organization of immigrants from Africa and their families. Its mission is to empower African immigrants to integrate socially, get ahead economically, and engage civically. ACT supports African

immigrants nationwide by providing direct services, including pro bono immigration legal services to indigent and underserved African immigrant clients; through leadership development programs, organizing, and civic education; and by advocating for policy reforms that would benefit its members, clients, and constituent communities. ACT is informed by legal and community partners on the ground and media reports that while the migrants expelled from Del Rio were overwhelmingly Haitian asylum seekers, they included in their number refugees from Ethiopia, The Congo, and other African countries who have joined with their fellow Black asylum seekers. As one of the largest organizations of and for African immigrants in the U.S., ACT frequently receives requests for assistance from African migrants and Afro-Caribbean migrants who have recently entered the U.S. and are seeking asylum, who are in immigrant detention, and who are in removal proceedings, as well as requests for support from the lawyers and community organizations who represent them. ACT attempts to respond to these requests for assistance to the best of its ability and within its available resources.

We request this information for the benefit of the general public.

If you deny any or all part of this request, please cite each specific exemption that you claim justifies your denial and notify me of the appellate procedures available under the law.

We prefer to receive these documents electronically. Please direct all inquiries and correspondence related to these Requests to:

Erin Thorn Vela
Texas Civil Rights Project
PO Box 219
Alamo, TX 78557
(956)-787-8171 ext. 127
erin@texascivilrightsproject.org

We would be happy to coordinate about the easiest way to transmit your response.

Thank you for considering this request.

Sincerely,

/s/ Jane Bentrott

Justice Action Center