IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

KNIGHT FIRST AMENDMENT INSTITUTE AT COLUMBIA UNIVERSITY,

Plaintiff,

v.

DEPARTMENT OF HOMELAND SECURITY, *et al.*,

Defendants.

Oral Argument Requested

Civil Action No. 1:17-cv-00548-TSC

SUPPLEMENTAL DECLARATION OF MATTHEW HELLMAN IN FURTHER SUPPORT OF PLAINTIFF'S CROSS-MOTION FOR SUMMARY JUDGMENT

Pursuant to 28 U.S.C. § 1746, I, Matthew Hellman, declare and state as follows:

1. I am an attorney at Jenner & Block, LLP.

3. I represent the Knight First Amendment Institute at Columbia University (the "Knight Institute" or "Institute") in this action.

4. I submit this supplemental declaration in further support of the Knight Insitute's Cross-Motion for Summary Judgment.

6. Attached hereto as Exhibit GG is a true and correct copy of the Search and Seizure Handbook, dated September 14 2012 (beginning 2017-ICLI-00011 16) that was produced by Immigration and Customs Enforcement ("ICE") in response to the Freedom of Information Act request submitted by the Knight Institute on March 15, 2017 (the "Request").

7. Attached hereto as Exhibit HH is a true and correct copy of the June 4, 2020 cover letter accompanying the production of a document to the Knight Institute from Customs and Border Patrol ("CBP") on that date.

7. Attached hereto as as Exhibit II is a true and correct copy of an undated spreadsheet (previously produced at CBP000147–54) that was produced by CBP in response to the Request and subsequently updated to disclose information previously withheld.

8. Attached hereto as Exhibit JJ is a true and correct copy of a communication from the Office of Civil Rights and Civil Liberties ("CRCL") at the Department of Homeland Security ("DHS") dated September 30, 2014 (beginning at DHS-001-00585-002036) that was produced by DHS in response to the Request.

9. Attached hereto as Exhibit KK is a true and correct copy of a communication from CRCL dated September 30, 2014 (beginning at DHS-001-00585-002043) that was produced by DHS in response to the Request.

10. Attached hereto as Exhibit LL is a true and correct copy of a communication from CRCL dated November 20, 2014 (beginning at DHS-001-00585-002147) that was produced by DHS in response to the Request.

11. Attached hereto as Exhibit MM is a true and correct copy of a communication from CRCL dated July 24, 2014 (beginning at DHS-001-00585-001997) that was produced by DHS in response to the Request.

12. Attached hereto as Exhibit NN is a true and correct copy of a memorandum dated August 27, 2009 (beginning at 2017-ICLI-00011 2306) that was produced by ICE in response to the Request.

13. Attached hereto as Exhibit OO is a true and correct copy of a memorandum dated December 11, 2008 (beginning at 2017-ICLI-00011 2287) that was produced by ICE in response to the Request.

14. Attached hereto as Exhibit PP is a true and correct copy of an investigatory record, dated October 2, 2014, submitted in response to a CRCL inquiry (beginning at 2017-ICLI-00011 2220) that was produced by ICE in response to the Request.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.



Executed: July 31, 2020

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