



September 12, 2024

VIA EMAIL: GOV.FOIA@Illinois.gov

Office of the Governor
555 W. Monroe Ave., 16th Floor
Chicago, IL 60661

Illinois Freedom of Information Act Request: Multinational Gangs in Illinois

Dear FOIA Custodian:

America First Legal Foundation is a national, nonprofit organization working to promote the rule of law in the United States, prevent executive overreach, and ensure due process and equal protection for all Americans, all to promote public knowledge and understanding of the law and individual rights guaranteed under the Constitution and laws of the United States. To that end, we file Freedom of Information Act (FOIA) and state-level document requests on issues of pressing public concern, then disseminate the information we obtain, making documents broadly available to the public, scholars, and the media. Using our editorial skills to turn raw materials into distinct work, we distribute that work to a national audience through traditional and social media platforms. AFL has over 269,000 followers on X, and our Founder and President has over 725,000 followers on X.

I. Requested Records

Under the Illinois Freedom of Information Act, 5 ILCS 140, AFL respectfully requests the following records:

- A. All records including the terms “Tren de Aragua” OR “TdA.”
- B. All records including the terms “Venezuela(n)” AND “gang(s).”
- C. All records referencing the presence of the Tren de Aragua gang in Chicago, Illinois, and in Illinois as a whole.¹

¹ NBC Chicago Staff, *CPD Addresses Viral Social Media Posts on 911 Call About Armed Venezuelan Gang at Chicago Building*, NBC CHICAGO (Sept. 4, 2024), <https://perma.cc/5AAP-4G2E>.

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- D. Records sufficient to show the number of Tren de Aragua gang members identified and arrested in Chicago, Illinois and Illinois statewide since January 21, 2021.
- E. All records referencing the arrests of Edwin Camejo,² Adelvis Rodriguez-Carmona,³ and any other known members of Tren de Aragua in Illinois, including but not limited to arrest affidavits and other applicable crime or incident reports.
- F. All communications with the U.S. Immigration and Customs Enforcement, Enforcement and Removal Operations Field Office in Chicago, Cook County Police Department, and Cicero Police Department referencing gang activity in the state of Illinois.

The time period for this request is January 1, 2023, through the date this request is processed. Custodians for this request include all employees in the Immediate Office of the Governor.

II. Fee Waiver

I understand that the Act permits a public body to charge a reasonable copying fee not to exceed the actual cost of reproduction and not including the costs of any search or review of the records. 5 ILCS 140/6. However, the law allows you to impose a waiver or reduction of fees when information is sought in the public interest, as is the case for this request. AFL is a qualified non-commercial public education and news media requester. Our officials routinely appear on national television and use social media platforms to disseminate the information it has obtained about federal government activities. In this case, AFL will make your records and your responses publicly available for the benefit of citizens, scholars, and others, and the public's understanding of your policies and practices will be enhanced through AFL's analysis and publication of the requested records. As a nonprofit organization, AFL does not have a commercial purpose, and releasing the requested information is not in AFL's financial interest.

III. Conclusion

I look forward to hearing from you in writing within five working days, as required by the Act 5 ILCS 140(3). If access to the records requested takes longer than expected, please provide information about the extenuating circumstances delaying

² Vi Nguyen, *Suspected Members of Venezuelan Gang Tren de Aragua Believed to Be Connected to Criminal Cases in Illinois and Indiana*, NBC CHICAGO (June 12, 2024), <https://perma.cc/V5HE-37JN>.

³ Press Release, U.S. Immigr. & Customs Enft, ERO Chicago Arrests Venezuelan Citizen With Ties to Tren de Aragua Criminal Organization (Mar. 24, 2024), <https://perma.cc/RB74-68ZD>.

the response. If any or all parts of this request are denied, please cite each specific exemption you feel justifies the refusal to release the records and provide notification of the appeal procedures available under the law. If you have any questions about this request or believe further discussions regarding search and processing would facilitate a more efficient production of records, then please contact me at FOIA@aflegal.org. To accelerate your release of responsive records, AFL welcomes production on an agreed-upon rolling basis. Please provide responsive records in an electronic format via email. Alternatively, please provide responsive records in native or PDF format on a USB drive to America First Legal Foundation, 611 Pennsylvania Ave SE #231, Washington, DC 20003.

Thank you in advance for your cooperation.

Thank you,

/s/ Rachel Jag

America First Legal Foundation