



December 19, 2024

Via Online Request Portal

Office of the Governor
Legal Counsel
State House
24 Beacon Street
Room 271
Boston, MA 02133

**Massachusetts Public Records Request: Communications Regarding
Federal Immigration Enforcement**

Dear Public Records Coordinator:

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 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's X page has over 320,000 followers.

I. Records Request

AFL respectfully requests, under the Massachusetts Public Records Law, G. L. c. 66, § 10(a):

- A. All communications with personnel from the embassies or consulates of the following countries: China, Colombia, Ecuador, El Salvador, Guatemala, Haiti, Honduras, Mexico, Nicaragua, Brazil, India, Nigeria, Pakistan, Somalia, or Venezuela.

611 Pennsylvania Ave SE #231
Washington, DC 20003

320 South Madison Avenue
Monroe, Georgia 30655

- B. All communications with correspondents with email domains ending in “dhs.gov” or “doj.gov” that mention or refer to Trump, immigration, or the arrest or presence of foreign nationals in the United States.
- C. All communications with correspondents with email domains ending in “un.org,” “gov.sa,” “gob.ve,” “diplomatie.ht,” “.pk,” “gob.ni,” “.ng,” “.ni,” “gob.gt,” “.gt,” “gob.hn,” “.hn,” “gob.sv,” “.sv,” “.ec,” “.so,” “.in,” “.br,” “gov.cn,” “edu.cn,” “.mx,” or “gob.mx” that mention or refer to Trump, immigration, or the arrest or presence of foreign nationals in the United States.
- D. All records and communications mentioning any of the following terms: “Trump,” “election,” “immigration,” “immigrant,” “detainer,” “Homan,” “NGO,” “alien,” “asylum,” “withholding of removal,” “family unit,” “[space]UAC[space],” “take our neighbors,” “migrant,” “public trust,” “sanctuary,” “safe space,” “Catholic Charities,” “Lutheran Immigration and Refugee Service,” “LIRS,” “Episcopal Migration Ministries,” “Hebrew Immigrant Aid Society,” “HIAS,” “Church World Service,” “World Relief Corp,” “primary mission,” “[space]INA[space],” “[space]ICE[space],” “Trust Act,” “removal,” “notice(s) to appear,” “notice(s) to report,” “order of recognizance,” “order of release,” “deport,” or “deportation.”
- E. All communications between custodians listed in Part II and correspondents in the Massachusetts Office of the Attorney General that mention or refer to Trump, immigration, or the arrest or presence of foreign nationals in the United States.
- F. All records, including communications, calendar entries, and documents mentioning or belonging to Governor Maura Healey since November 1, 2024.
- G. Please exclude all responsive records containing the word “unsubscribe.”

The time period for these items is from November 1, 2024, to the date this request is processed. This request does not include communications that are press releases, news articles, or messages sent via listserv.

II. Custodians

- A. Maura Healey, Governor
- B. Kim Driscoll, Lieutenant Governor

- C. Kate Cook, Chief of Staff
- D. Gabrielle Viator, Senior Advisor
- E. Kristian Hoysradt, Deputy Chief of Staff to the Lieutenant Governor
- F. Juan Gallego, Assistant Deputy Chief of Staff to the Lieutenant Governor
- G. Katharine Thibodeau, Senior Executive Assistant and Special Advisor to the Governor
- H. TJ Flaherty, Executive Assistant & Scheduler for the Lieutenant Governor
- I. Kiran Denbow, Executive Co-Op
- J. Paige Scott Reed, Chief Legal Counsel
- K. Jesse Boodoo, Deputy Chief Legal Counsel
- L. Adam Hornstine, Deputy Legal Counsel
- M. Dara Kesselheim, Deputy Legal Counsel
- N. Gregory Schmidt, Deputy Legal Counsel
- O. Kimberly Baptiste, Legal Program Coordinator
- P. Odessa Sanchez, Legal Co-op

III. Fee Waiver

AFL requests a waiver of all search and duplication fees associated with this request under G. L. c. 66, § 10(d)(v). 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. Furthermore, the requested records are in the public interest because they will shed light on state officials' efforts to undermine the enforcement of Federal immigration law. If you believe that AFL would be required under Massachusetts law to pay any fees in connection with this request, please contact us immediately upon making that determination.

IV. Processing and Production

The Public Records Law requires a response within ten business days. If access to the records requested takes longer than expected, please provide information about the extenuating circumstances delaying 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.

Sincerely,

/s/ Will Scolinos

America First Legal Foundation