UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

C.G.B. et al., Plaintiffs, v. CHAD WOLF, Acting Secretary U.S. Department of Homeland Security et al., Defendants.	)	Civil Action No. 20-1072 (CRC)

MOTION TO DISMISS

Defendants Chad Wolf, in his official capacity as the Acting Secretary of the Department of Homeland Security ("DHS"), and William Barr, in his official capacity as the Attorney General, hereby move to dismiss, in part, the Petition for a Writ of Mandamus and Complaint for Declaratory and Injunctive Relief (the "Complaint"; ECF No. 3) pursuant to Federal Rule of Civil Procedure 12(b)(1) and 12(b)(6). In support, Defendants submit the accompanying Memorandum of Points and Authorities.

Dated: July 31, 2020

Respectfully submitted,

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MEMORANDUM IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS

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Defendants Chad Wolf, in his official capacity as the Acting Secretary of the Department of Homeland Security ("DHS"), and William Barr, in his official capacity as the Attorney General, hereby move to dismiss, in part, the Petition for a Writ of Mandamus and Complaint for Declaratory and Injunctive Relief (the "Complaint"; ECF No. 3).

The instant motion to dismiss seeks to further narrow the scope of an ambitious, but fatally overreaching, Complaint. As the Court is familiar, Plaintiffs, transgender aliens in the custody of U.S. Immigration and Customs Enforcement ("ICE"), filed a class-action Complaint seeking the release of all transgender people in immigration detention nationwide based on alleged conditions in ICE detention facilities that Plaintiffs claimed violated their Fifth Amendment due process rights and the Administrative Procedure Act ("APA"). *See generally* ECF No. 3. They filed a motion for a temporary restraining order ("TRO") directing ICE to immediately release all transgender civil detainees across the country and even to refrain from detaining any additional transgender aliens until the COVID-19 pandemic ends. *See generally* ECF No. 4. Plaintiffs also moved to certify a nationwide class of transgender ICE detainees housed at detention facilities across the nation. ECF No. 21. On June 2, 2020, the Court denied both the Plaintiffs' motion for a TRO and motion to certify a class. ECF No. 42 ("Opinion" or "Op."). Now, Defendants move to dismiss most of the original named Plaintiffs and most of the claims in the Complaint.

When Plaintiffs filed the Complaint on April 23, 2020, there were thirteen named Plaintiffs in ICE detention. As a consequence of many Plaintiffs being released from detention or removed from the U.S., only three Plaintiffs remain in ICE detention: K.R.H., K.M., and K.S.[1] *See* ECF No. 55 at 4. In fact the lead Plaintiff, C.G.B., was released on bond last week. The claims of the

[1] Similarly, when the Complaint was filed, named Plaintiffs were housed at eight facilities. The remaining Plaintiffs reside at two facilities: La Palma Correctional Center ("La Palma") and Nevada Southern Detention Center ("Nevada Southern")).

named Plaintiffs no longer in ICE detention should be dismissed because their claims are now moot, and the Court no longer maintains subject matter jurisdiction to hear their claims.

For the few remaining Plaintiffs, their claims under the APA and for a writ of mandamus should be dismissed. As suggested by the Court's TRO Opinion, Plaintiffs have failed to allege a plausible APA claim because they have not identified a "final agency action" that could be considered a violation of the APA. Plaintiffs' claims are premised on ICE's alleged failure to implement its Pandemic Response Requirements ("PRR")[2] in various detention facilities at which Plaintiffs are housed. But alleged shortcomings in implementing a policy are not final agency actions, and Plaintiffs point to no final, discrete decision by ICE not to implement the PRR, which otherwise would be necessary to state an actionable APA claim. Plaintiffs' mandamus claims fall for similar reasons.

* * *

Given the extensive briefing and evidentiary submissions, as well as the Court's thorough Opinion concerning the above-mentioned motions, Defendants have opted not to restate the well-known allegations in the Complaint.

LEGAL STANDARD

Federal Rule of Civil Procedure 12(b)(1) governs motions to dismiss for lack of subject matter jurisdiction. As discussed below in further detail, courts lack subject matter jurisdiction where a plaintiff lacks constitutional standing to bring suit.

Federal Rule of Civil Procedure 12(b)(6) governs motions to dismiss for failure to state a claim. "To survive a motion to dismiss, a complaint must contain sufficient factual matter,

[2] U.S. ICE Enforcement and Removal Operations, COVID-19 Pandemic Response Requirements, available at https://www.ice.gov/doclib/coronavirus/eroCOVID19responseReqsCleanFacilities.pdf

accepted as true, to 'state a claim to relief that is plausible on its face.'" *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (quoting *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007)). A claim is facially plausible "when the plaintiff pleads factual content that allows the court to draw the reasonable inference that the defendant is liable for the misconduct alleged." *Id*. (citing *Twombly*, 550 U.S. at 556). The plaintiff must allege sufficient facts to show "more than a sheer possibility that a defendant has acted unlawfully." *Id.* (citing *Twombly*, 550 U.S. at 556).

ARGUMENT

I. The Claims of Certain Named Plaintiffs Should Be Dismissed as Moot

To maintain an actionable claim, a plaintiff must possess standing under Article III of the Constitution, which means a plaintiff must have "'a personal stake in the outcome of the controversy' [so] as to warrant his invocation of federal-court jurisdiction." *Warth v. Seldin*, 422 U.S. 490, 498 (1975) (quoting *Baker v. Carr*, 369 U.S. 186, 204 (1962)). But even if standing once existed at the time the action was initiated, courts must ensure that jurisdiction continues to exist throughout all stages of the litigation. *Davis v. FEC*, 554 U.S. 724, 732–33 (2008) ("To qualify as a case fit for federal-court adjudication, an actual controversy must be extant at all stages of review, not merely at the time the complaint is filed.") (internal quotation marks omitted). Subsequent events may render a once-viable claim moot, and that is what has occurred here for most of the original named Plaintiffs. *Advanced Mgmt. Tech., Inc. v. FAA*, 211 F.3d 633, 636 (D.C. Cir. 2000) (noting that "[s]tanding is assessed at the time the action commences," whereas mootness refers to when "a justiciable controversy existed but no longer remains").

The claims of all named Plaintiffs who are no longer in ICE detention should be formally dismissed because their claims regarding their conditions of confinement are moot, and the court lacks subject matter jurisdiction. According to the D.C. Circuit, "a prisoner's transfer or release from a prison moots any claim he might have for equitable relief arising out of the conditions of

his confinement in that prison." *Scott v. District of Columbia*, 139 F.3d 940, 941 (D.C. Cir. 1998). The same would be true of an immigration detainee released from ICE detention because the challenged conditions of confinement no longer apply to them. Likewise, the relief these Plaintiffs initially sought—freedom from these alleged conditions through release from immigration detention[3]—can no longer be effected. *See Ortez v. Chandler*, 845 F.2d 573, 575 (5th Cir. 1988) ("It is not the fact that [petitioner] has been deported that renders this appeal moot …. Rather, it is the fact that the habeas relief he requests—reduction of his bond—can no longer be effected."). Finally, Plaintiffs have acknowledged that the release of a Plaintiff moots her claims. Op. at 10 n.9 (citing Transcript of Hearing on TRO Mot. ("TRO. Tr.") 3:14–4:4 (May 6, 2020)).

Accordingly, Defendants request that the claims of the ten named Plaintiffs no longer in ICE detention be formally dismissed. C.G.B., the lead Plaintiff, is the most recent and tenth Plaintiff to have left ICE detention. On July 22, 2020, C.G.B. was released on bond from the Caroline Detention Center. Supplementary Declaration of Kevin Bourne ¶ 4. Three other Plaintiffs were released on bond ordered by an immigration judge.[4] One was released on an order of supervision because she had a health condition that made her potentially vulnerable to COVID-

[3] Plaintiffs made clear that release (rather than a more narrowly-tailored remedy) was the only relief they sought. *See, e.g.*, ECF No. 3, Compl. at ¶ 2 ("Petitioners therefore seek the supervised release of all transgender people in immigration detention because ICE has not provided and cannot implement sufficient measures to curb the spread of COVID-19 in its facilities."); *id*. at ¶ 136 ("Because ICE cannot provide adequate medical care to them, transgender people in civil immigration detention should be released immediately to safer environments.); *id*. at ¶ 137 ("Even if it followed its own requirements, ICE could not adequately protect transgender people in civil immigration detention from unconstitutional risks of infection posed by suspected or confirmed COVID-19 infections of other detainees or facility staff.").

[4] On April 24, 2020, R.H. was released on bond from the Caroline Detention Facility. ECF No. 20-12, Mullan Decl. ¶ 7–8. ICE released L.R.A.P. from La Palma on bond on May 1, 2020. ECF No. 27-3, Ciliberti Supp. Decl. ¶ 48. ICE released A.F. from La Palma on bond on May 14, 2020. ECF No. 45-3, Ciliberti Second Supp. Decl. ¶ 28.

19.[5] Three were granted humanitarian parole under 8 U.S.C. § 1182(d)(5) for non-detained removal proceedings.[6] One Plaintiff was granted relief from removal by an immigration judge.[7] One was removed from the United States.[8] Although the grounds for their departure from ICE detention differ, they all departed through the operation of the existing immigration system without the need for judicial intervention.

II. The Complaint Fails to State a Claim Under the Administrative Procedure Act

Plaintiffs have failed to state an APA claim because they are not challenging an identifiable "final agency action" of Defendants. Only "final agency action for which there is no other adequate remedy in a court" is reviewable under the APA. 5 U.S.C. § 704. A plausibly stated APA claim must identify an "agency action" and that action must be "final." First, the APA defines "[a]gency action" to "include[] the whole or a part of an agency rule, order, license, sanction, relief, or the equivalent or denial thereof, or failure to act." *Id.* § 551(13). These are all "discrete" actions, and "when challenging the failure to take an agency action under 5 U.S.C. § 706(1) or § 706(2)(A), a plaintiff must challenge a 'discrete agency action' and cannot make 'a broad programmatic attack' on an agency's compliance with a statutory scheme." *CREW v. DHS*, 387 F. Supp. 3d 33, 48–49 (D.D.C. 2019) (quoting *Norton v. S. Utah Wilderness Alliance ("SUWA")*, 542 U.S. 55, 62

[5] On April 30, 2020, ICE released G.P. from Imperial Regional Detention Facility on an order of supervision because she had a health condition that made her vulnerable to COVID-19. ECF No. 20-13, Valenzuela Decl. ¶ 28–29.

[6] ICE has released L.M., D.B.M.U., and M.J.J. from Aurora Contract Detention Facility ("Aurora"). ECF No. 55-2, Davies Third Supp. Decl. ¶ 4. They were granted humanitarian parole under 8 U.S.C. § 1182(d)(5) and were paroled into the United States for non-detained removal proceedings on June 1, 2020, May 27, 2020, and June 5, 2020, respectively. *Id.*, ¶¶ 4a–c.

[7] On July 14, 2020, ICE released M.R.P. from El Paso Processing Center after an Immigration Judge granted her relief from removal. ECF No. 55-1, Acosta Supp. Decl. ¶ 3.

[8] On July 10, 2020, M.M.S-M. was removed from the United States to El Salvador after the Board of Immigration Appeals dismissed her appeal. ECF No. 55-2, Davies Third Supp. Decl. ¶ 5.

(2004)). Second, for the agency action to be "final": (1) "the action must mark the consummation of the agency's decisionmaking process—it must not be of a merely tentative or interlocutory nature" and (2) "the action must be one by which rights or obligations have been determined, or from which legal consequences will flow." *Bennett v. Spear*, 520 U.S. 154, 177–78 (1997) (internal citations and quotation marks omitted).

Here, the Court found that "Plaintiffs' APA claim is premised on ICE's alleged failure to implement the PRR in the various detention facilities at which Plaintiffs are housed." Op. at 72 (citing Compl. ¶ 66); *see also* Compl. ¶¶ 114, 177. Plaintiffs' Complaint, however, "does not identify 'an agency action within the meaning of § 702, much less a final agency action within the meaning of § 704.'" *Id.* (quoting *Lujan v. Nat'l Wildlife Fed'n*, 497 U.S. 871, 890 (1990)). None of the alleged failures to implement the PRR or to protect Plaintiffs from the risks of COVID-19 plausibly state a "'consummation' of the agency's decisionmaking process" with regard to a discrete agency action. Plaintiffs have not alleged facts indicating ICE made a discrete agency decision not to implement the PRR in whole or in part. "To the contrary, the record shows the agency is making reasonable efforts to implement the PRR at the facilities at issue in the face of "the rapidly changing situation relating to the COVID-19 pandemic." Op. at 73 (quoting *Nat'l Immigration Project of Nat'l Lawyers Guild v. EOIR* ("NILPNLG"), No. 1:20-CV-00852, 2020 WL 2026971 at *5 (D.D.C. Apr. 28, 2020)).

Basing their APA claim on the so-called *Accardi* doctrine, originating from *United States ex rel. Accardi v. Shaughnessy*, 347 U.S. 260 (1954), does not salvage their claim. *See* Compl. ¶¶ 153-66. "*Accardi* has come to stand for the proposition that agencies may not violate their own rules and regulations to the prejudice of others." *Battle v. FAA*, 393 F.3d 1330, 1336 (D.C. Cir.

2005). Accordingly, Plaintiffs contend that, "under *Accardi*," ICE's failure to "abide by the PRR is arbitrary and capricious" in violation of the APA. Op. at 71.

The Court, however, has already ruled that Plaintiffs' "*Accardi* claims are barred because they are not based on final agency action and are not the type of claims covered by *Accardi*." Op. at 71. As Defendants established previously, *Accardi* does not allow a plaintiff to avoid the statutory requirement of identifying a "final agency" action. In other words, Plaintiffs would have to allege facts establishing that ICE made a "final" decision not to comply with the PRR. TRO Opp. at 22-24. Yet the Court held that "Plaintiffs do not identify any discrete final agency decision not to implement the PRR." Op. at 73. Without a final agency action, any APA claim, premised on *Accardi* or not, must fail. Furthermore, as the Court held, Plaintiffs claim a violation of *substantive* due process resulting from ICE's alleged failures and the *Accardi* doctrine is "rooted in notions of *procedural* due process." Op. at 74-75 (citing authority). Therefore, Plaintiffs' reliance on the *Accardi* doctrine does not support a plausibly alleged APA claim.

Finally, Plaintiffs' APA claims are barred to the extent Plaintiffs' claims challenge, directly or indirectly, Defendants' parole decisions. Plaintiffs' Complaint suggests that ICE should be using its discretionary authority to parole transgender people who are in detention. *See* Compl. ¶ 161. The Court has interpreted Plaintiffs' Complaint as "not purport[ing] to challenge the agency's parole determinations themselves." Op. at 74. The Court recognized that such determinations are "[u]n reviewable discretionary decisions." *Id*. at 64. The INA strips courts of jurisdiction to review or set aside these discretionary determinations.[9] *See* 8 U.S.C. § 1252(a)(2)(B)(ii) ("no court shall have jurisdiction to review . . . any other decision or action of

[9] Congress clearly committed the determination of whether to parole an alien to the agency's discretion. *See* 8 U.S.C. § 1182(d)(5)(A).

the Attorney General or the Secretary of Homeland Security the authority for which is specified under this subchapter to be in the discretion of the Attorney General or the Secretary of Homeland Security"); 8 U.S.C. § 1226(e) ("No court may set aside any action or decision by the Attorney General under this section regarding the detention or release of any alien or the grant, revocation, or denial of bond or parole."); *see also Sacal-Micha v. Longoria*, Civ. A. No. 20-37, 2020 WL 1815691, at *7-8 (S.D. Tex. Apr. 9, 2020) (denying APA claim as basis for seeking release on parole because parole decisions are committed to the agency's discretion and thus the court does not have jurisdiction). The INA is consistent with the APA, which itself bars judicial review of agency action "committed to agency discretion by law." 5 U.S.C. § 701(a)(2). Therefore, an APA claim directly or indirectly challenging Defendants' discretionary parole decision-making is barred.

For the foregoing reasons, Plaintiffs have not stated a plausible claim for a violation of the APA.

III. The Complaint Fails to State a Claim for a Writ of Mandamus

Plaintiffs have also failed to allege the "extraordinary circumstances" that would justify the "drastic" remedy of issuing a writ a mandamus. *Power v. Barnhart*, 292 F.3d 781, 784 (D.C. Cir. 2002) (internal quotation marks omitted). Mandamus is available only where (1) a plaintiff has a clear and indisputable right to relief, (2) that the government agency or official is violating a clear duty to act, and (3) that no adequate alternative remedy exists.[10] *United States v. Monzel*,

[10] These three threshold requirements are jurisdictional; unless all are met, a court must dismiss the case for lack of jurisdiction. *See In re Medicare Reimbursement Litig.*, 414 F.3d 7, 10 (D.C. Cir. 2005) (internal quotation marks and alteration omitted). "Even when the legal requirements for mandamus jurisdiction have been satisfied, however, a court may grant relief only when it finds compelling equitable grounds." *Id.* "The party seeking mandamus has the burden of showing that its right to issuance of the writ is clear and indisputable." *Power*, 292 F.3d at 784 (internal quotation marks omitted).

641 F.3d 528, 534 (D.C. Cir. 2011). It is "reserved only for the most transparent violations of a clear duty to act." *In re Bluewater Network*, 234 F.3d 1305, 1315 (D.C. Cir. 2000). The pleading in the Complaint has not met this high threshold.

A writ of mandamus requires the violation of a "clear duty to act," which is a duty that is mandatory and non-discretionary. *See CREW v. SEC*, 916 F. Supp. 2d 141, 151-52 (D.D.C. 2013) ("To be enforceable through mandamus, the agency's duty must be 'so plainly prescribed as to be free from doubt and equivalent to a positive command.'") (quoting *Wilbur v. United States*, 281 U.S. 206, 218 (1930)). Obligations that allow for judgment or discretion—such as how to mitigate the spread of a virus at a detention facility or whether to parole or release a detainee—are not subject to writs of mandamus. Op. at 76; *see also Beatty v. Washington Metro. Area Transit Auth.*, 860 F.2d 1117, 1127 (D.C. Cir. 1988) ("Generally speaking, a duty is discretionary if it involves judgment, planning, or policy decisions. It is not discretionary [i.e., ministerial] if it involves enforcement or administration of a mandatory duty . . . .") (quoting *Jackson v. Kelly*, 557 F.2d 735, 737–38 (10th Cir.1977)).

Plaintiffs also have not alleged an "indisputable right to [the] relief" they seek, immediate release from immigration detention. Plaintiffs cite no statute or regulation, for example, which entitles them to release from detention even assuming a violation of a "clear duty." A review of other mandamus cases illustrates how clear or indisputable the right to relief must be to justify a writ. In *Walprin v. Corporation for National and Community Services*, plaintiff sought a writ directing his restoration to the position of Inspector General. 630 F.3d 184, 186 (D.C. Cir. 2011). The relevant statute, however, did not grant such relief, as it prevented removal of an Inspector General only for a limited time, which was for thirty days after the President notifies Congress of the intent to remove. *Id*. at 187. Here, the Complaint does not point to a statute or any authority

that is even related to the relief Plaintiffs seek much less one that provides an indisputable right to relief.

Finally, as the Court previously indicated, Plaintiffs have not alleged any facts establishing the lack of available alternative remedies. Indeed, Plaintiffs have asserted claims under the Fifth Amendment and the APA to challenge their alleged conditions of confinement. The Court found adequate remedies available in the form of the APA, albeit pursuant to 5 U.S.C. § 706(1), which authorizes a reviewing court to "compel agency action unlawfully withheld or unreasonably delayed," and not under the provision alleged by Plaintiffs (§ 706(2)(A)). Here, the failing under either the APA or the writ of mandamus is the same: a failure to plausibly allege a duty or agency action that ICE was legally mandated and decided not to take to protect Plaintiffs during the COVID-19 pandemic. *See CREW*, 916 F. Supp. 2d 141, 151-52 ("The standards for APA relief under § 706(1) and for mandamus here are identical, [] and to the extent that it is unable to compel specific action under the APA, this Court is similarly unable to issue mandamus in such a circumstance.") (citations omitted). In other words, the issue is not the lack of available remedies; the issue is whether Plaintiffs have sufficiently pled the causes of action underlying those remedies.

IV. The Declaratory Judgment Act Provides No Independent Cause of Action

Count IV purports to state a claim under the Declaratory Judgment Act ("DJA"), but the DJA provides no independent cause of action. The DJA does not waive sovereign immunity. *United States v. King*, 395 U.S. 1, 5 (1969). It does not constitute an independent basis for jurisdiction. *Schilling v. Rogers*, 363 U.S. 666, 677 (1960) (citing *Skelly Oil v. Phillips Petroleum Co.*, 339 U.S. 667, 671, (1950)). Rather, the statute merely creates a remedy where there is another cause of action within the Court's jurisdiction. *Id.*; *see also Seized Prop. Recovery, Corp. v. CBP*, 502 F. Supp. 2d 50, 64 (D.D.C. 2007) ("Although Plaintiff purports to bring this claim under the Declaratory Judgment Act, it does not specify any cause of action through which the Court may

exercise subject matter jurisdiction and grant declaratory relief."). Therefore, Defendants request that this claim be dismissed to the extent there is no other viable claim available to a Plaintiff.

CONCLUSION

For the foregoing reasons, Defendants respectfully request that the Court dismiss (a) all claims of Plaintiffs C.G.B., R.H., G.P., L.R.A.P., A.F., L.M., D.B.M.U., M.J.J., M.M.S-M., and M.R.P. for lack of standing; (b) Count II (Violation of the Administrative Procedure Act) of the Complaint; (c) Count III (Writ of Mandamus) of the Complaint; and (d) Count IV (Declaratory Judgment Act) of the Complaint to the extent any Plaintiff has not plausibly alleged another claim.

Dated: July 31, 2020
Washington, DC

Respectfully submitted,

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UNITED STATES DISTRICT COURT
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C.G.B. et al., Plaintiffs, v. CHAD WOLF, Acting Secretary U.S. Department of Homeland Security et al., Defendants.	)	Civil Action No. 20-1072 (CRC)

[PROPOSED] ORDER

Upon consideration of Defendants' Motion to Dismiss, Memorandum of Points and Authorities, and any opposition or reply thereto, it is hereby **ORDERED** that:

(1) All claims of Plaintiffs C.G.B., R.H., G.P., L.R.A.P., A.F., L.M., D.B.M.U., M.J.J., M.M.S-M., and M.R.P. are **DISMISSED** for lack of standing;

(2) Count II (Administrative Procedure Act) of the Complaint is **DISMISSED**;

(3) Count III (Writ of Mandamus) of the Complaint is **DISMISSED**; and

(4) Count IV (Declaratory Judgment Act) of the Complaint is **DISMISSED** to the extent any Plaintiff has not plausibly alleged another claim.

It is **SO ORDERED** this day of _____, 2020.

_____
Hon. Christopher R. Cooper

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

C.G.B. et al., Plaintiffs, v. CHAD WOLF, Acting Secretary U.S. Department of Homeland Security et al., Defendants.	Civil Action No. 20-01072 (CRC)

SUPPLEMENTARY DECLARATION OF KEVIN BOURNE

I, Kevin Bourne, hereby declare, based on personal knowledge and belief, and under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am employed as a Deportation Officer (DO) with the U.S. Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO), at the Florence Detention Center (FDC), Florence, Arizona.

2. I provide this declaration based on my personal knowledge, belief, reasonable inquiry, and information obtained from various records, systems, databases, other DHS employees, employees of DHS contract facilities, and information portals maintained and relied upon by DHS in the regular course of business.

3. Petitioner C.G.B. was previously detained at the FDC.

4. Petitioner C.G.B. has been released from the FDC and currently in non-detained removal proceedings.

    a. On July 16, 2020, the immigration judge ordered C.G.B. released on a $9,000 bond.

    b. On July 22, 2020, C.G.B.'s bond was posted and C.G.B. was released from ICE custody.

5. No date has yet been set for C.G.B's next hearing on the non-detained docket with the Phoenix immigration court.

I declare, under penalty of perjury under 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge and based on information obtained from other individuals employed by ICE.

DATED: July 31, 2020

Kevin Bourne
Deportation Officer
Florence Detention Center
Enforcement and Removal Operations
Immigration and Customs Enforcement