



Glades County Sheriff's Office  
P.O. Box 39  
Moore Haven, FL 33471  
Fax 863.946.0845  
Public\_Sheriff@gladessheriff.org

Sent by fax and email

June 29, 2018

RE: Public Information Request for Glades County Detention Center

To the Custodians of Records for Glades County Sheriff's Office:

This letter constitutes a request for public records<sup>1</sup> under Florida's Sunshine Law. FLA STAT. §§ 119, 286. It is the policy of Florida that all "state, county, and municipal records are open for personal inspection and copying by any person." § 119.01(1).

Americans for Immigrant Justice and Muslim Advocates ("Requestors") request copies of public records that are maintained by or that are in the custody or control of Glades County Sheriff's Office ("Recipient") pertaining to the Glades County Detention Center ("the Center").

Requestors also ask that the Recipient refer the requests contained in this letter to any other state or local agency or component agency, if it does not have responsive records for any request.

Requestors request copies of records meeting the following description:

1. The most current and complete contracts and contract modifications or addenda for the Glades County Detention Center generated on or after January 1, 2013:
  - a) between the Glades County Sheriff/Sheriff's Office and the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), or the U.S. Marshals Service;
  - b) and between any and all private operators or contractors providing services to or supplying goods for the Center, on the one hand, and the Glades Sheriff/Glades County Sheriff's Office, on the other.

---

<sup>1</sup> "Public records" means all documents, papers, letters, maps, books, tapes, photographs, films, sound recordings, data processing software, or other material, regardless of the physical form, characteristics, or means of transmission, made or received pursuant to law or ordinance or in connection with the transaction of official business by any agency. FLA. STAT. §119.011(12).

Please note that this request includes any modifications or addenda extending or modifying a contract, such that the contracts are provided in their current and complete form.

2. Records pertaining to Glades County Sheriff's Office official policies or practices with regard to supervision, monitoring, or assistance with operations at the Glades County Detention Center. This request does not include the social security numbers, addresses, telephone numbers, dates of birth, or photographs of employees.
3. Inspections reports, notes, audit or site visit records of the Glades County Detention Center, generated from 2015 to present. This request shall include reports from ICE Enforcement and Removal Operations, ICE Office of Detention and Oversight, and the DHS Office of Inspector General, any outside auditor as well as reports generated by Glades County Sheriff's Office or County employees from routine inspections.
4. Operative version of the Glades County Detention Center religious services manual or equivalent policy document that lists institutional religious services, rules, and regulations. For example, that document or series of documents might contain, among other relevant rules: religious exercise rules; the rules governing inmate attendance at religious services/group worship; inmate facilitation of religious study groups; use of the chapel or other designated worship spaces; visits from religious advisor; religious diet requests; religious mail; possession of religious attire, literature, and objects; and personal grooming.
5. Operative version of the Glades County Detention Center detainee handbook, which would include policies and procedures for submitting requests and formal or informal grievances and appeals.
6. All formal and informal grievances and complaints regarding religious services or accommodations submitted by prisoners or by civil detainees, including immigration detainees, ever housed at Glades County Detention Center. This request only covers records created from January 1, 2017 to present.
7. Any and all responses to the grievances/complaints in Request No. 4 by Glades County Detention Center or Glades County Sheriff employees. For example, such responses might include written decisions, appeal records, replies, emails, or notes between staff members regarding the complaints. This request also covers records created from January 1, 2017 to present.
8. Emails, notes, circulars, memoranda, and any and all other records created by the Sheriff of Glades County, by Chaplain Booher, by Major Henson, or by other Glades County Detention Center staff on any of these subjects: Ramadan, fasting, prayer, Qur'an requests/Qur'an access, Bible access, Friday prayer, Kufis or other religious headgear, or the Eid feast. This request covers records created from January 1, 2016 to present.

9. Any and all video surveillance footage from Glades County Detention Center or from employees at the Center wearing body cameras at the facility. This request is limited to recordings made in the last 90 days.
10. Any and all invoices and expense reports, including cover pages and supporting documentation, submitted to the U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement, or the Office of Detention and Removal for detention services or expenses at the Glades County Detention Center. This request is limited to invoices and reports generated for the current month and for the last eight months.
11. Records created on or after January 1, 2017 containing the number of incarcerated or detained persons of each religion at the Glades County Detention Center. For example, this request would include records that stated “Glades County Detention Center has 200 Christian detainees/inmates, 100 Jewish detainees/inmates, [etc.]” and would also include records that could be obtained by searching an inmate/detainee management system or equivalent database. If possible, please disaggregate data by gender, nationality, race, and age.
12. Training documents or materials maintained on or after January 1, 2017 that Glades County Detention Facility or the Glades County Sheriff’s Office have used to train or to educate staff on Muslim detainees or Islam in general.

Where possible, please provide responsive material in electronic format by email to [yusuf@muslimadvocates.org](mailto:yusuf@muslimadvocates.org). Please furnish any responsive material being sent by mail to:

Joseph (Yusuf) Saei  
Muslim Advocates  
P.O. Box 66408  
Washington, D.C. 20035

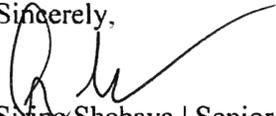
Requestors ask for a waiver of all fees in that the disclosure of the requested information is in the public interest and that access to the information primarily benefits the general public. The Sunshine Law mentions that agencies “may” assess fees but does not require them to do so. *See* FLA STAT. § 119. Muslim Advocates is a 501(c)(3) non-profit organization dedicated to preserving religious freedom for Americans of all faiths. Americans for Immigrant Justice is also a 501(c)(3) non-profit, dedicated to protecting and promoting the basic human rights of immigrants of all nationalities at the local, state, and national levels. This request is likely to contribute significantly to public understanding of the operations or activities of the government and is not in the commercial interest of the Requestors. Requestors also request a waiver of search fees on the grounds that they qualify as representatives of the news media for federal FOIA purposes, as the requestors gather information, exercise editorial discretion in selecting and organizing documents and distribute the resulting work to the public. In light of these considerations, fees associated with responding to the request should be waived. In the event that you do assess fees, please inform Requestors in writing if the estimated fees will exceed 100 dollars.

If a civil action is filed against an agency to enforce the Sunshine Law, the court “shall assess and award the reasonable costs of enforcement, including reasonable attorney fees, against the responsible agency” if the court finds that 1) the agency unlawfully refused to permit a public record to be inspected or copied and 2) if the complaint provided written notice to the agency custodian “at least 5 business days before filing the civil action.” FLA. STAT. §119.12(1)(a)-(b). Accordingly, Requestors ask that you provide a response within five business days.

If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law. In the event you believe any of the requests may be withheld, redacted, or denied, we ask that you segregate public information from information that may be withheld and promptly provide that public information.

Thank you for considering this request.

Sincerely,



Sirine Shebaya | Senior Staff Attorney  
Joseph (Yusuf) Saei | Yale Liman Fellow\*  
Muslim Advocates  
P.O. Box 66408  
Washington, DC 20035  
*\*Admitted in California, supervised by  
members of the D.C. bar*



Lisa Lehner | Senior Litigation Attorney  
Lily Hartman | Jonathan Demme Human  
Rights Advocate  
Americans for Immigrant Justice  
3000 Biscayne Blvd., Suite 400  
Miami, FL 33137