

THE ALL-IN-ONE GUIDE TO

DEFEATING ICE HOLD REQUESTS

(a.k.a. Immigration Detainers)

APPENDIX 8

Background Information and Reports



ALL IN ONE GUIDE TO DEFEATING ICE HOLDS

APPENDIX 8

Background Information and Reports

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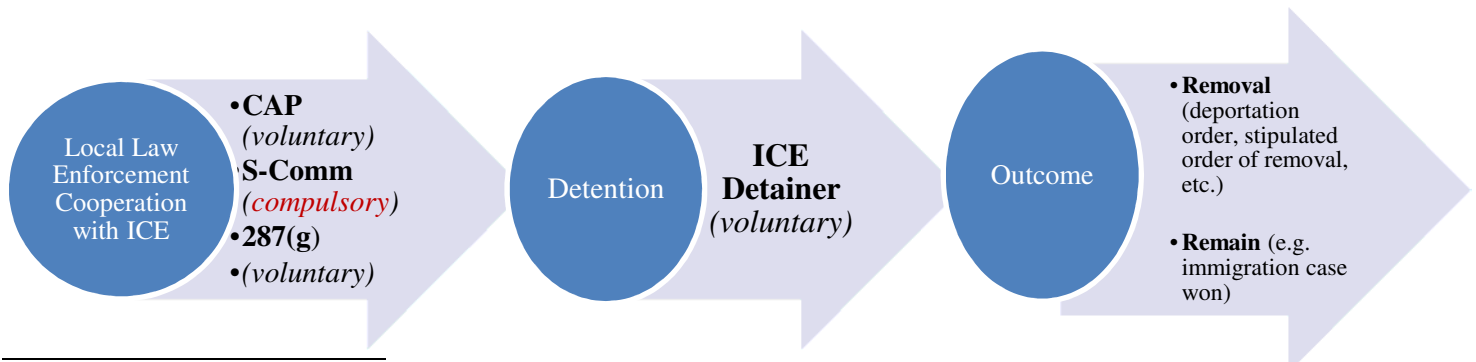
Pushing Back on ICE Enforcement Inside Local Jails: An Advocacy Guide to the Criminal Alien Program (“CAP”) – the DHS Enforcement Program Responsible for More Deportations Than Secure Communities

WHAT is “CAP”? The Criminal Alien Program (“CAP”) is a program administered by Immigration and Customs Enforcement (“ICE”) agents. Through CAP, ICE officials identify allegedly deportable noncitizens in jails and prisons in the United States for the purpose of potentially initiating deportation proceedings against them.¹ ICE officers identify these noncitizens by screening the biographical information of inmates in the jail, such as place of birth, and also by entering jails and conducting interviews. CAP may include ICE agents’ direct access to jail records, which they check against immigration databases to see if they already have records of the detainees.

What is the relationship between CAP, Secure Communities (S-Comm), 287(g), and ICE Detainers? CAP, along with S-Comm and 287(g), is part of larger efforts by ICE to collaborate with local law enforcement to enforce federal immigration laws. CAP and S-Comm are information sharing efforts through which ICE is able to identify deportable noncitizens. 287(g) involves training local officers to screen and identify individuals for deportation. Once a person is identified, the next step is issuance of the ICE detainer, the non-obligatory request from ICE to local law enforcement to hold an individual for ICE. Once ICE takes custody of the individual, this often results in deportation.

CAP is distinct from Secure Communities (S-Comm), a program launched in 2008, where fingerprints taken at booking in local jails are sent to ICE, and ICE cross-checks those fingerprints with their data to identify any allegedly deportable individuals. The CAP program pre-existed fingerprint sharing with ICE, and is a more generalized program for ICE to interact with local and state jails to identify, screen, and interview inmates to find possibly deportable individuals. The ways in which S-Comm and CAP interact, or how ICE attributes deportations to one program versus the other, is not entirely clear. However, both the S-Comm and CAP programs may result in an ICE detainer.

While CAP has existed in various forms and under different names since 1986, much is still unknown about the program. Through a recent lawsuit filed by the American Immigration Council and the Worker and Immigrant Rights Advocacy Clinic at Yale Law School, however, we have received more information about this key ICE enforcement program.



¹See <http://www.ice.gov/news/library/factsheets/cap.htm>.

Pushing Back on ICE Enforcement Inside Local Jails:

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WHY is CAP important in efforts to combat local immigration enforcement? When it comes to combating local immigration enforcement, advocates often focus on Secure Communities because it is the newest immigration enforcement program and has received extensive media attention. However, advocates should focus equally on combating the effects of CAP.

CAP, not S-Comm, is the primary program under which individuals in the criminal justice system are identified for removal. CAP was in place long before S-Comm and presently operates out of all ICE field offices, in all state and federal prisons, and many local jails. From 2007 to approximately mid-2012, there were approximately 2.5 million CAP encounters.²

CAP presents an additional opportunity for advocates – while S-Comm is obligatory, state prisons and local jails’ compliance with ICE’s CAP operations is entirely voluntary. Advocates can use CAP to push for changes in local jail practices and policies that limit the identification and removal of immigrants even beyond local detainer restrictions.

HOW to use CAP in advocacy: Specific ways that advocates can and should fight CAP.

- 1. Ask how is CAP operating locally.** Since CAP functions differently in different jails, advocates should find out what relationship local law enforcement and in particular local jailers, have with ICE. To assess this relationship, advocates may ask the following questions:
 - a.** Do officers question individuals about their citizenship, immigration status, national origin, and/or place of birth at booking? If so, is this information shared with ICE?
 - b.** Does the jail provide ICE with an office or desk at the jail? Or are there regularly scheduled jail visits for ICE?
 - c.** Does the jail provide ICE access to a detainee’s information? Does the jail provide ICE agents access to question or investigate inmates who are in custody that have admitted foreign birth?

- 2. If CAP is operating in your local jails, (which it usually is, in one form or another), **advocates should push for policies that deny ICE access to records and inmates.**** Remember that cooperation with ICE via CAP is entirely discretionary. Without this free access to records and inmates, ICE will not be able to use CAP to generate additional ICE detainers. Be prepared for ICE to fight back against these efforts.

One example of a successful campaign which fought against CAP is Santa Fe, New Mexico. There, ICE was routinely asking for jail population lists and targeting individuals for interviews based on Latino surnames. However, because the jail director viewed these practices as a form of racial profiling and learned that compliance with ICE’s requests was voluntary, the jail decided that ICE would no longer be given access to inmates or their data. Thus, ICE was limited in its ability to issue ICE detainers through this facility.

² *American Immigration Council v. Dept of Homeland Security*, No. 12-00355, Dkt. 27-2, 22 (D. Conn. July 12, 2012) available at http://www.legalactioncenter.org/sites/default/files/docs/lac/27-2_Matuszewski_Declaration_%282%29.pdf

Pushing Back on ICE Enforcement Inside Local Jails: An Advocacy Guide to the Criminal Alien Program (“CAP”) – the DHS Enforcement Program Responsible for More Deportations Than Secure Communities

Campaign Example: Washington, DC enacted a policy that stops the jail from holding most inmates subject to ICE detainees. It also explicitly states that the jail will not send any lists of foreign born inmates to ICE, that ICE will not have access to any booth or facilities for individualized searches about inmates, and that ICE will be prevented from interviewing inmates unless there is a court order or the right to have an attorney present. A related administrative order ensures that all inmates are informed in writing that any information they provide to federal agents can be used against them in criminal, immigration, and other proceedings.

Campaign Example: On Rikers Island, in New York City, ICE agents have a long-term office within the jail complex, and plainclothes ICE agents would interview inmates under the guise of a "legal visit" without identifying themselves as ICE agents. Due to public pressure concerning immigrants' rights from inside the jail, as well as the cost of immigration detainees and related litigation, the jail now requires that ICE officers wear uniforms; that people are informed that a requested visit is from an ICE officer; and that immigrants are given Form 144, a form advocates created to explain why ICE wants to interview them and what their rights are, and to give them the choice of whether they want to meet with ICE.

The fight against CAP strengthens campaigns against ICE hold requests. By fighting CAP, we are able to stop ICE from finding or identifying so many individuals, thereby reducing the issuance of ICE holds. Thus, fewer people will be ultimately turned over to ICE. Advocates can link the following messaging to campaigns fighting ICE holds, arguing that all cooperation with ICE, either through compliance with ICE detainees or with CAP efforts, should be limited or altogether eliminated. Below are talking points to use when combating CAP:

- **Compliance with CAP is voluntary:** State prisons and jails are not required to cooperate with ICE’s CAP program nor are they required to share biographical information about their inmates with ICE through CAP.³
- **CAP is indiscriminate:** Like S-Comm, CAP ties immigration consequences with being brought into jail, regardless of the outcome of a criminal case, if any. CAP funnels people directly from local police to deportation.⁴
- **CAP Furthers Racial Profiling:** Under CAP, ICE officers access lists of inmates and may select those who are foreign-born or who have Latino-sounding last names to determine whom to interview. Police are not immune to this, and they play a significant role in determining who is brought into the jails. In Texas, a study showed that low level traffic arrests of Latinos by local police officers rose significantly when CAP programs were instituted in the area.⁵
- **CAP violates due process:** ICE officers have been known to use coercive tactics such as refusing to identify themselves or misrepresenting that they are legal counsel. There have been frequent reports of ICE agents threatening detained noncitizens that they will languish in immigration detention if they don’t sign stipulated orders of removal. ICE officers may also pressure noncitizens to sign stipulated orders of removal based on faulty assumptions that noncitizens prefer to be deported.⁶ Whereas a noncitizen typically has a right to see an immigration judge before being ordered deported, a stipulated order of removal effectively functions as a deportation order, waives the right to see a judge, and carries additional immigration consequences.
- **Cooperating with ICE through CAP harms community trust:** During a time deportations are at an all-time high, cooperation with ICE through CAP sends the community the message that local law enforcement is aligned with ICE and should not be trusted.

³ *American Immigration Council v. Dept of Homeland Security*, No. 12-00355, Deposition of Jameson Matuszewski, 224:20-225:3 (D. Conn. Feb. 1, 2012) available at http://legalactioncenter.org/sites/default/files/2-1-13-Matuszewski_Deposition-Compressed.pdf

⁴ *Id.* at 216:5-18.

⁵ Trevor Gardner II and Aarti Kohli, *The C.A.P. Effect: Racial Profiling in the ICE Criminal Alien Program*, The Chief Justice Earl Warren Institute on Race, Ethnicity & Diversity, U.C. Berkeley Law School (September 2009) available at: http://www.law.berkeley.edu/files/policybrief_irving_FINAL.pdf

⁶ Immigration and Customs Enforcement, *Recommendations to Improve Removal Processes* (Feb. 22, 2007) available at <http://www.legalactioncenter.org/sites/default/files/docs/lac/CAP%20FOIA%20240-244.pdf>

Background on Secure Communities and Immigration Detainers

The “Secure Communities” program, which sends fingerprints from local police to check against federal immigration databases, was officially launched in 2008. Since that time, Immigration and Customs Enforcement (ICE) began gradually adding jurisdictions to the program. However, many local governments objected to the effects of “Secure Communities,” i.e., the rapid increase in deportations of immigrants stopped by police for minor traffic violations, despite the claims that the program was designed to deport people who are a “danger to the community,” and the erosion of trust between immigrant communities and local public safety officers. In 2010, Massachusetts, along with Washington DC, Illinois and New York, refused to participate in the program at the statewide level.

But in May 2012, over the opposition from Massachusetts Governor Patrick, Boston Mayor Menino, Chelsea Police Chief Kyes, Cambridge Police Commissioner Hass, and widespread outcry from faith communities, labor unions, legal advocates, immigrants, and community organizations, the federal government decided to unilaterally impose the “Secure Communities” program on Massachusetts, and activated it on May 15, 2012.

How “Secure Communities” Operates

“Secure Communities” is not a criminal justice, counter-terrorism, or security program; it is a deportation program that involves sending fingerprints to ICE. State and local police already send fingerprints for comparison to the FBI and checked for criminal history, outstanding criminal warrants, or other security risks. Sharing these fingerprints with Immigration and Customs Enforcement only checks for the civil immigration history associated with those prints.

For police departments in Massachusetts, the activation of “Secure Communities” means that the FBI’s response to a fingerprint query will be accompanied by an IAR (“Immigration Alien Response”), along with an IDENT Data Response (IDR) printout from the Law Enforcement Support Center about the arrested individual’s immigration records. The response may be a “match” or a “no-match.” A “no-match” response indicates that there is no record for this person in the immigration databases. A “match” reflects a record in the immigration database and may provide some limited information about that person’s immigration status. A “match” does not mean the individual is present without authorization, or even that the person is not a citizen.

Local law enforcement is not authorized to take action on the Immigration Alien Response (IAR) to a fingerprint check. The Law Enforcement Support Center automatically sends the IAR to the local ICE office. Only ICE agents have authority to make decisions about any immigration enforcement actions.¹

Increased Immigration Detainers

As a result of the new fingerprint sharing, police officers may receive Immigration Detainer requests from ICE. While police departments in Massachusetts may have received immigration detainers in the past, these requests are likely to increase as a result of “Secure Communities.”

A Form I-247 Immigration Detainer (also known as an “ICE hold” or “immigration hold”) is a *request* that a local law enforcement agency briefly continue to detain a prisoner to give ICE time to assume custody of that person if they choose to do so. When ICE files a valid immigration detainer Form I-247 against an inmate, the local law enforcement agency may continue to hold that individual for up to 48 hours, excluding weekends and federal holidays, after the person is otherwise entitled to be released. **If ICE has not assumed custody of a person upon the expiration of the 48-hour time period, the person must be immediately released from custody. ICE cannot extend the 48 hour time period. A phone call from ICE does not constitute a lawful or valid immigration detainer.**

Immigration detainers are very different from criminal detainers, and the following legal distinctions should be clarified for all officers in Massachusetts:

1. An immigration detainer is not a warrant. It is not supported by probable cause and does not rest on any legal standard for arresting or detaining someone.²
2. An immigration detainer is not a criminal detainer, and does not fall under the Interstate Agreement on Detainers.
3. An immigration detainer is not evidence that the subject is wanted or dangerous. A detainer only indicates that ICE believes the subject is not a citizen and may be deportable.³

¹ See ICE Secure Communities Standard Operating Procedures: www.epic.org/privacy/secure_communities/securecommunitiesops93009.pdf.

² See 8 C.F.R. § 287.7(a).

³ See Department of Homeland Security, Immigration Detainer – Notice of Action, DHS Form I-247 (12/11).

4. An immigration detainer is not evidence that the person does not have valid immigration status. It is not a removal order and does not constitute any evidence that the person is deportable. It does not even demonstrate that the person is a non-citizen, because ICE has erroneously placed numerous detainers on U.S. citizens.⁴
5. An immigration detainer does not necessarily mean that ICE intends to take custody of the person. ICE often lodges an immigration detainer against an inmate, but then never takes custody of that person.
6. An immigration detainer does not affect that person's right to promptly post bond or complete other processing or paperwork necessary for release.

How to Respond to Immigration Detainers

Immigration detainers are merely requests, not orders, and we urge you not to submit to them. Although there is some confusion about this among law enforcement agencies, ICE has stated clearly to Congress that immigration detainers are voluntary. Federal courts and legal analysts have confirmed that the federal government cannot compel local law enforcement to arrest or detain anyone.⁵ An ICE detainer does not take away Massachusetts police' discretion to release anyone.

To provide a clear line between public safety officers and immigration enforcement, Massachusetts law enforcement agencies should establish clear, bright-line policy of not holding detainees for ICE beyond the time that the state would ordinarily release them from custody. While Massachusetts police departments may not be able to prevent the FBI from sending fingerprint queries to ICE, all police departments have the authority to release individuals from custody, regardless of any immigration detainer. Protecting Massachusetts police autonomy from Immigration and Customs Enforcement is important for several reasons.

First, **police participation in immigration enforcement undermines community trust in local law enforcement.** When the public fears that they, or their friends or family members, could end up in deportation proceedings as a result of interactions with the police, they are much less likely to report crimes or testify as witnesses. Non-citizens may be more likely to flee from the scene of an accident, regardless of whether they are at fault or are a victim who is seriously injured. Police compliance with immigration detainers leaves victims without recourse and enables further criminal activity, which decreases, rather than increases, security in the community.

Second, **holding individuals on immigration detainers puts the city or county at serious risk of liability for unlawful detention.** Jails and police departments around the country have been held liable for illegal detention of immigrants who had been held beyond the 48 hour limit. Furthermore, because most immigration detainers are not supported by probable cause of any crime, any extended detention on an immigration detainer may constitute unlawful seizure in violation of the Fourth Amendment. ICE does not reimburse cities or counties for any costs associated with immigration detainers.

Third, **submitting to immigration detainers allows ICE to put Massachusetts police officers in the middle of immigration enforcement operations and politics.** ICE depends on police submitting to immigration detainers for the "Secure Communities" program to work. But there is no need for Massachusetts police to do ICE's job, particularly when the Governor and the people of Massachusetts oppose the program. Immigration is not the responsibility of Massachusetts, and state and local resources shouldn't be spent identifying and detaining immigrants for ICE. Massachusetts police have plenty of other more important responsibilities.

Finally, **complying with detainers does nothing to improve safety or security in Massachusetts.**⁶ Immigration detainers are not a public safety tool; they are a vehicle for deportation. Individuals who face criminal charges can be detained, prosecuted and sentenced regardless of an immigration detainer or immigration status. Thus a policy not to hold individuals on ICE detainers will not interfere with any normal law enforcement or security operations. Those facing charges will be detained by the county or be released on bail in exactly the same manner as they always have been.

Existing Immigration Detainer Policies

Cities and counties around the country have developed policies against immigration detainers for all of these reasons. Examples include Cook County, IL, which includes the city of Chicago, Santa Clara County, CA, which includes San Jose, and New York City. The Connecticut Department of Corrections recently established a state-wide policy limiting detention on immigration detainers.

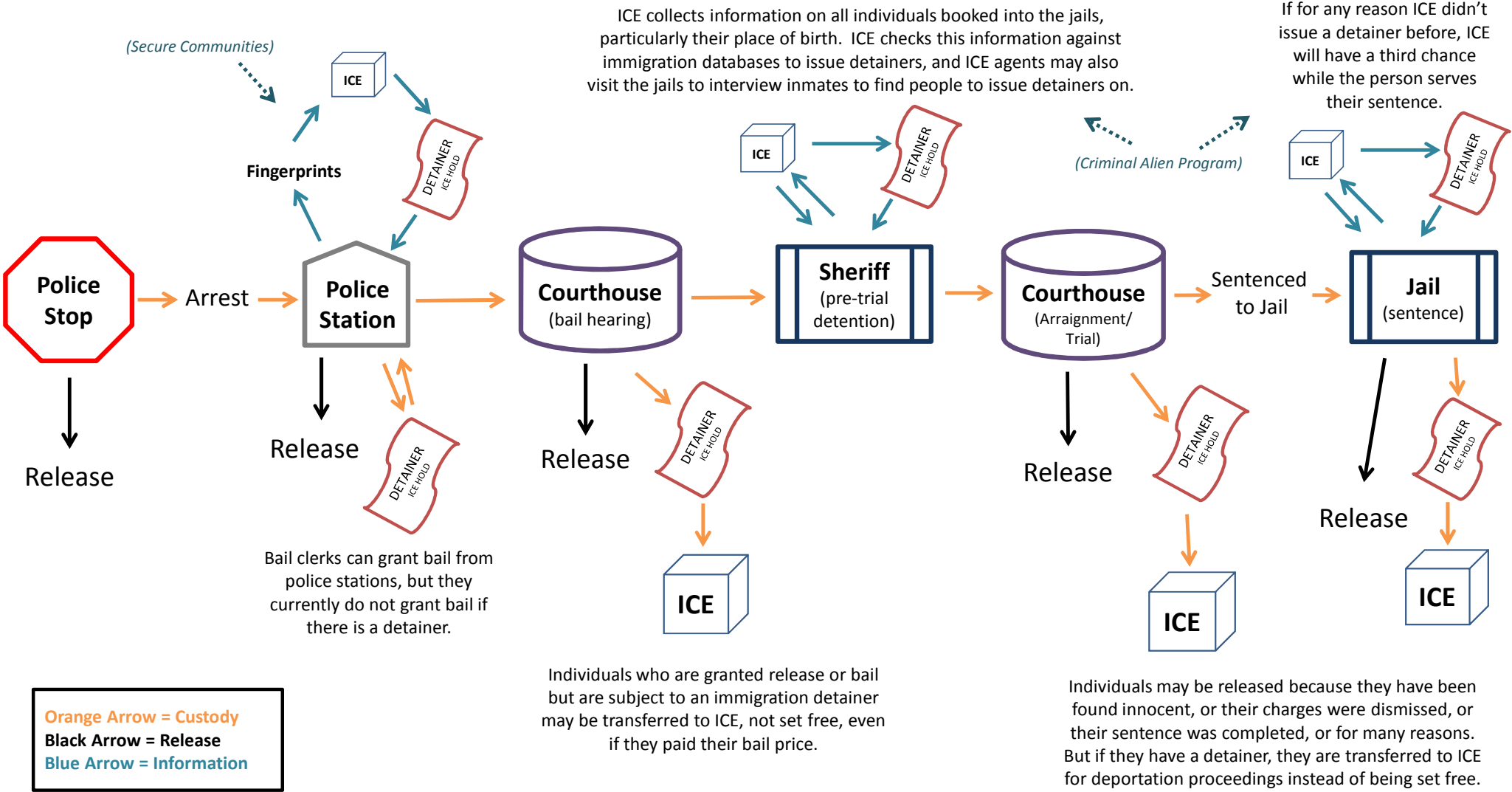
Massachusetts police should follow their lead and avoid entangling themselves in immigration enforcement by enacting policies to avoid immigration detainers. Police compliance with ICE detainers erodes the basic civil liberties of all Americans, and is particularly destructive to the lives of non-citizens living in or travelling in Massachusetts. Police can better achieve their mission to reduce crime and protect public safety in Massachusetts by declining to participate in any federal civil immigration enforcement.

⁴ See Julia Preston, Immigration Crackdown Also Snares Americans (*New York Times*, Dec. 13, 2011).

⁵ See National Immigration Project, Immigration Holds (Detainers) Are Voluntary For Local Law Enforcement (2012).

⁶ A recent study in Chicago demonstrated that individuals released in spite of ICE detainers were no more likely to re-offend or flee than those not subject to detainers. See Chip Mitchell, ICE Detainers a Public Safety Issue? *WBEZ 91.5* (May 16, 2012).

ICE and the Massachusetts Criminal Justice Process



Who Are the Targets of ICE Detainers?

During a recent 50-month period covering FY 2008 through the start of FY 2012, U.S. Immigration and Customs Enforcement (ICE) agents issued nearly one million detainers, according to case-by-case records obtained by the Transactional Records Access Clearinghouse (TRAC) through a Freedom of Information Act request^[1].

Update: Additional information on detainers issued against U.S. citizens and legal permanent residents can be found in [this report](#).

An immigration "detainer," often called an "immigration hold," is a notice that Department of Homeland Security (DHS) agents issue to local, state and federal law enforcement agencies. It is a primary tool ICE uses to apprehend suspected noncitizens being held by these authorities.

In more than two out of three (77.4%) of the detainers issued by ICE, the record shows that the individual who had been identified had no criminal record — either at the time the detainer was issued or subsequently. For the remaining 22.6 percent that had a criminal record, only 8.6 percent of the charges were classified as a Level 1 offense. See Figure 1.

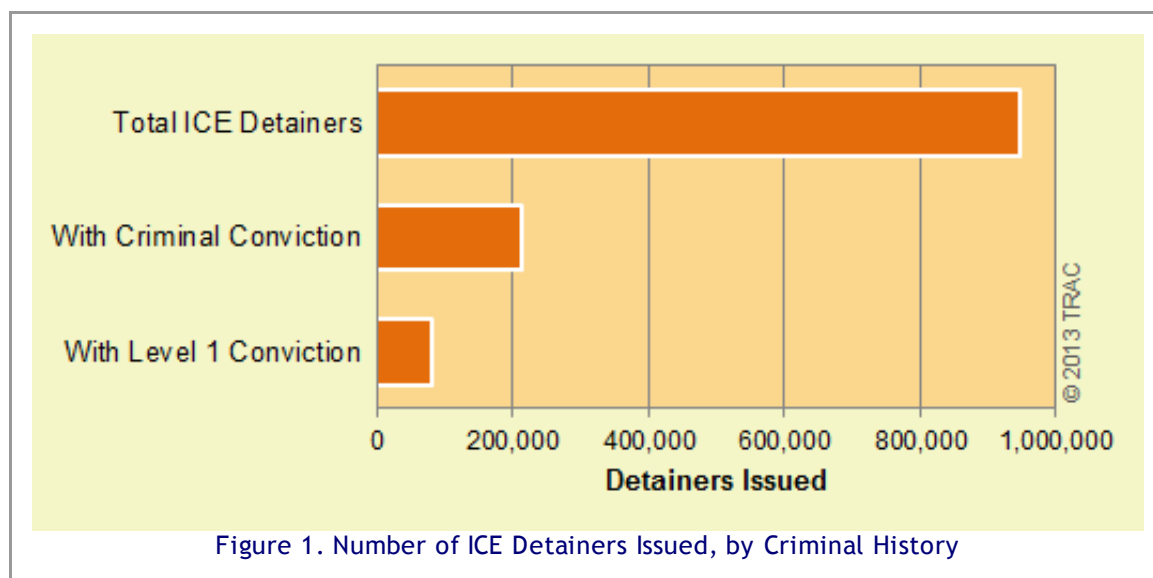


Figure 1. Number of ICE Detainers Issued, by Criminal History

ICE inexplicably withheld any information on the nature of the crime for which the individual had been convicted. However, as TRAC [reported in February 2012](#), the ICE basis for classifying individuals as "serious" offenders — that is, Level 1 — appears to be flawed, since their records show that all too often the most serious Level 1 offenders have only been convicted of traffic violations and immigration violations (illegal entry) rather than some more serious offense. Accordingly, it appears likely that far fewer than even this small proportion of 8.6 percent actually would meet the more objective standards of having been convicted of crimes that pose a serious threat to national security or public safety.

Detainer notices ask agencies to continue holding individuals so that DHS agents can take them into custody. A detainer is often triggered when a local or state agency books an individual into jail and sends the individual's fingerprint records to the FBI to see if the individual has any criminal record. These fingerprint records are now routinely passed onto ICE to check against its files.

While over 3,500 different detention facilities received one or more ICE detainers, ICE did not release essential information about them — inexplicably, for example,

withholding even the state where they were located. The total number of detainers for each facility, along with whether ICE had any record that the individuals were ever convicted of any crime, can be found in [Table 1](#). But because of the missing information, care should be exercised for facilities with common names since if there is more than one facility in the country with that name, the statistics will combine their counts.

Table 1. Number of ICE Detainers Issued, by Location Name
([click to open in separate window](#))

ZANESVILLE CITY JAIL	3	3	
ZAPATA COUNTY JAIL	178	168	10
ZARZAL CORRECTIONAL INST.	6	6	
ZAVALA COUNTY JAIL	18	14	4
FACILITY NOT SPECIFIED	67,921	63,332	4,589

* ICE inexplicably withheld the name of the state where these facilities were located. Caution should be exercised for facilities with common names such as "Adams County Jail," "Lake County Jail," or "Lincoln County Jail" because there may be several states with facilities having the same name. The FOIA request of December 2, 2011 to ICE asked for 80 items of information about each detainer that had been issued on or after October 1, 2007. Only eleven of these 80 items of information were released. The date the detainer was issued was not provided, so there is no way to check the actual period covered by these data nor to examine how the number of detainers may have changed over time.

** Convictions include criminal violations of all types, including violations for which a ticket is issued, no court appearance is required and a small fine is imposed.

ICE also released information on the citizenship, age, and gender of the subject of each detainer. Not unexpectedly, most (95%) involved males. The median age was 30. There were 5,895 individuals with detainers that were under 18, and 28,489 who were recorded as 65 years of age or older. Most (72.7%) were recorded as Mexican citizens. Others in the top five were citizens of Guatemala (5.3%), Honduras (4.9%), El Salvador (4.3%), and Cuba (1.2%). A total of 2,269 were Canadian citizens. See [Table 2](#).

Table 2. Number of ICE Detainers Issued, by Citizenship
([click to open in separate window](#))

VIRGIN ISLANDS, U.S.	5	4	1
WALLIS AND FUTUNA ISLANDS	2	2	
WESTERN SAHARA	1	1	
YEMEN	117	99	18
YUGOSLAVIA	197	169	28
ZAMBIA	113	83	30
ZIMBABWE	153	115	38

* The FOIA request of December 2, 2011 to ICE asked for 80 items of information about each detainer that had been issued on or after October 1, 2007. Only eleven of these 80 items of information were released. The date the detainer was issued was not provided, so there is no way to check the actual period covered by these data nor to examine how the number of detainers may have changed over time.

** Convictions include criminal violations of all types, including violations for which a ticket is issued, no court appearance is required and a small fine is imposed.

While the press have quoted ICE officials as contending that the agency did not track how many U.S. citizens had been inadvertently held in immigration detention, the data released to TRAC indicate that a substantial number of U.S. citizens may be affected. It is illegal for DHS to detain U.S. citizens, and to do so is a significant violation of their constitutional rights. According to ICE records, detainers were issued on a total of 834 individuals who were actually U.S. citizens. In addition, detainers were issued on a total of 28,489 legal permanent residents (LPRs). LPRs — or "green card" holders — are individuals who have been officially granted the right to live and work permanently in the United States. ICE issued detainers on these individuals even though for 20,281

of them ICE had no record of any criminal conviction.

The records ICE released to TRAC do not include any information on whether the detainer was ever lifted, whether the individual was ultimately deported, and if not deported, when they were released from ICE custody. Having a detainer placed on you, however, even if ICE has mistakenly done so, can have very significant ramifications. Inadequate safeguards exist to prevent such mistakes from happening or to rectify them after they have happened. ICE has wide administrative powers to detain individuals it suspects may be present in this country illegally. Because these are considered "civil" and not "criminal" detentions, the protections afforded someone who is a criminal defendant or arrested by local, state or federal criminal law enforcement authorities do not come into play.

Subsequent to the period covered by these data, ICE issued a revised detainer form on December 21, 2012. (Compare [new DHS Form I-247](#) with [previous DHS Form I-247](#).) According to the [accompanying memorandum](#) issued by ICE Director John Morton, these revisions were made to provide a better mechanism to "ensure that ICE's finite enforcement resources are dedicated, to the greatest extent possible, to individuals whose removal promotes public safety, national security, border security, and the integrity of the immigration system."

The newly issued form added a series of checkboxes so that the reason(s) the detainer fit within the agency's existing priorities would be expressly noted. TRAC recommends that ICE Director Morton proactively publish monthly statistics tracking how many detainers have been issued under this new policy, where they were issued, the numbers issued corresponding with each checkbox on the new detainer form, and their ultimate outcome, including removals that subsequently occurred. These statistics could be modeled after those the agency now publishes each month for its Secure Communities Program. Public transparency is a useful tool that could assist in seeing that these announced priorities are faithfully carried out.

[¹] The FOIA request of December 2, 2011 to ICE asked for 80 items of information about each detainer that had been issued on or after October 1, 2007. Only eleven of these 80 items of information were released. The date the detainer was issued was not provided, so there is no way to check the actual period covered by these data nor to examine how the number of detainers may have changed over time. This report does not include any information on detainers that have been issued by U.S. Customs and Border Protection (CBP).

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THE UNIVERSITY OF WASHINGTON

IMMIGRATION DETAINER REQUESTS IN KING COUNTY, WASHINGTON

Costs and Consequences

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March 26, 2013



This report was commissioned by the Northwest Defenders Association. Special thanks to Mike West, Project/Program Manager in the King County Department of Adult and Juvenile Detention, for providing the dataset and answering our questions about its construction. Thanks also to Lucie Bernheim and Eileen Farley for their assistance in compiling criminal history information.

EXECUTIVE SUMMARY

In recent years, the federal government has expanded local involvement in the enforcement of immigration laws. As a result, an increasing number of suspected immigration law violators are detained in local jails at the request of the Immigration and Customs Enforcement (ICE) agency. This report analyzes data provided by King County to assess how ICE detainer requests impact jail stays, and what this costs local governments. The data include all inmates released from a King County jail in 2011 who were either charged with a crime or released from jail after prosecutors did not file charges. The findings indicate that ICE detainer requests significantly extend jail stays, do not primarily target serious criminals, have a pronounced impact on the county's Latino population, and consume significant government resources.

On average, people subject to ICE detainers stay in jail 29.2 days longer than others. The results of a statistical regression analysis indicate that ICE detainer requests increase people's jail stay by 161% after case characteristics are taken into account. For example, a person who would otherwise be expected to stay in jail for 30 days would, as a result of an ICE detainer request, stay in jail for a total of 78.3 days instead.

The findings also cast doubt on the contention that ICE mainly targets people with serious criminal charges and histories. Nearly two-thirds of the people flagged by ICE were not charged with a felony offense associated with their booking, and approximately one in eight were not charged with any crime at all. Moreover, only one in five people subject to ICE detainer requests and who were charged with a crime had been previously convicted of a felony in Washington State; only 18% had been convicted of a crime against a person in the state. These findings suggest that most people flagged by ICE have not been convicted of a serious crime.

The results also indicate that honoring ICE detainer requests has a pronounced impact on the county's Latino population. More than one-fourth (28.7%) of all people booked into a King County jail and identified as Hispanic were transferred upon their release, presumably to ICE. This includes people who were transferred to ICE without having been charged with a crime. The fact that more than one in four Latino people who enter jail in King County are transferred to ICE suggests that the practice of honoring ICE detainers may undermine police efforts to secure the trust and cooperation of people living in immigrant and/or Latino neighborhoods.

The county and municipalities within it are responsible for the fiscal costs associated with the extended jail stays that result from ICE detainers. We estimate that the extra jail days associated with ICE detainers cost nearly \$3 million per year in jail costs alone. The results also suggest that not honoring detainer requests would save King County and local municipalities approximately \$1.8 million each year in jail costs.

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INTRODUCTION

Over the past decade, Immigration and Customs Enforcement (ICE) – a division of the U.S. Department of Homeland Security (DHS) – has dramatically increased its efforts to apprehend and deport noncitizens who come into contact with state and local criminal justice systems.¹ In practice, this involves the direct transfer of people into ICE custody immediately upon their release from jail. This transfer occurs after ICE files with the jail, and the jail then honors, an ICE immigration detainer request (commonly referred to as an ICE hold or ICE detainer).² A detainer is a request from ICE to hold otherwise releasable detainees for up to 48 hours – excluding weekends and holidays – so that ICE has the opportunity to interview and/or transfer the individual to federal immigration custody.

According to ICE, this arrangement is an efficient way of identifying criminal immigration law violators and others who pose security risks to the public.³ Yet these ICE enforcement practices have engendered significant controversy, and critics have raised a number of concerns about them. First, although ICE contends that it seeks primarily to identify arrestees who have committed serious crimes,⁴ there is evidence that many of those subject to ICE detainer requests were arrested for minor offenses, including traffic violations. Moreover, a recent national study found that only one in five people detained by ICE had ever been convicted of a crime.⁵ Critics are also concerned that the intermingling of immigration enforcement and the criminal justice system undermines police efforts to gain trust in communities with significant immigrant populations, and may encourage the racial profiling of Latinos.⁶ Finally, honoring ICE detainers may significantly extend jail stays beyond 48 hours, and the costs associated with any such extended stays are borne by localities. In light of these concerns, numerous local

¹ Since 2001, ICE has expanded or initiated a series of programs to carry out these efforts, including the Criminal Alien Program (CAP), Secure Communities, the National Fugitive Operations Program (NFOP) and the 287(g) program. From 2004-2011, funding for these programs increased from \$23 million to \$690 million. See Mark R. Rosenblum and William A. Kandel, "Immigration Enforcement: Programs Targeting Criminal Aliens" *Congressional Research Service* 2011, available at <http://www.fas.org/sgp/crs/homsec/R42057.pdf>

² In the criminal context, detainers are based on warrants approved by a judge and are issued after charges have been filed. In the immigration context, however, detainers are issued by administrative ICE officers, and these requests are not reviewed by judges. See Judith A. Greene, *The Cost of Responding to Immigration Detainers in California: Preliminary Findings*, August 2012. Available at <http://www.justicestrategies.org/publications/2012/cost-responding-immigration-detainers-california>

³ See Immigration and Customs Enforcement (ICE), "Secure Communities." Available at http://www.ice.gov/secure_communities/

⁴ ICE recently reiterated this broad principle in a December 21, 2012 memo from Director John Morton. See <http://www.ice.gov/news/releases/1212/121221washingtondc2.htm>.

⁵ Transactional Records Access Clearinghouse (TRAC) Report, "Who Are the Targets of ICE Detainers?", Feb 20, 2013. Syracuse University. Available online <http://trac.syr.edu/immigration/reports/310/>

⁶ See Trevor Gardner II and Aarti Kholi, "The CAP Effect: Racial Profiling in the ICE Criminal Alien Program", The Chief Justice Earl Warren Institute on Race, Ethnicity & Diversity, University of California Berkeley Law School (2009).

governments have elected not to honor ICE detainers or to limit the circumstances under which they do so.⁷

This report focuses on the impact of honoring ICE detainer requests on jail stays in King County, Washington.⁸ Previous studies indicate that ICE detainers extend jail stays by significantly more than one or two days in other jurisdictions. For example, a 2011 study found that Los Angeles jail inmates subject to ICE detainer requests spent an average of 20.6 more days in jail than other inmates.⁹ In Travis County, Texas, there is evidence that arrestees subject to ICE detainer requests spend, on average, three times longer (65-76 days) than others (22-26 days).¹⁰ Similarly, a 2010 study found that New York City jail non-citizen inmates flagged by ICE spent 73 more days in jail, on average, than others (after controlling for race and offense level).¹¹

ICE detainers may significantly increase the amount of time people spend in jail because defendants and court actors alike understand that people subject to ICE detainer requests will likely be transferred to ICE upon their release, and hence that pre-trial release from jail would halt the criminal process. Studies suggest that this knowledge affects defendant and court actors' decision-making processes in a number of ways. For example, people who are subject to an ICE detainer request may be less likely to post bail or obtain a bond because they understand that they would not be able to return to court, and would therefore forfeit these funds.¹² People subject to detainer requests may also be more likely to plead not guilty so that they can make arrangements regarding their expected deportation.

Court actors' decision-making processes may also be impacted by ICE detainer requests. For example, prosecutors may see ICE detainer requests as indicators that a defendant is a flight risk, and therefore ask that judges set comparatively high bail amounts or deny pre-trial release altogether. Similarly, it is conceivable that ICE detainers effect judicial decision-making with

⁷ The following counties have limited the circumstances under which they will honor ICE detainers: Cook County, IL, Santa Clara County, CA, Washington, D.C., New York City, San Francisco, CA. See "Santa Clara County To Stop Honoring Immigration Detainers For Low-Level Offenders" at <http://latimesblogs.latimes.com/lanow/2011/10/santa-clara-county-to-stop-honoring-immigration-detainers-for-low-level-offenders-.html>; "D.C. Passes Act Limiting District's Response To ICE's Immigration Detainers" at <http://immigrationimpact.com/2012/06/05/dc-passes-act-limiting-districts-response-to-ices-immigration-detainers/>; NYC Council Oks Bucking Some Immigration Detainers",

<http://online.wsj.com/article/APe62317ccb60e414eb4905a019af37d01.html>. See also, Kamala Harris, Attorney General, California Department of Justice, "Responsibilities of Local Law Enforcement Agencies Under Secure Communities", available at: <http://online.wsj.com/article/APe62317ccb60e414eb4905a019af37d01.html>

⁸ The data analyzed in this report pertain to the two adult jail facilities operated by King County.

⁹ Greene, *op.cit.*

¹⁰ National Immigration Forum, *Immigrants Behind Bars: How, Why, and How Much* (March 2011).

¹¹ Aarti Shahani, *New York City Enforcement of Immigration Detainers: Preliminary Findings*, October 2010.

Available at <http://www.justicestrategies.org/publications/2010/new-york-city-enforcement-immigration-detainers>

¹² Greene, *op.cit.*

respect to pre-trial release.¹³ Finally, there is evidence that some jail inmates with ICE detainer requests have been held for more than 48 additional hours while awaiting transfer to ICE in some jurisdictions.¹⁴ To the extent that one or more of these factors are operative, the practice of honoring ICE detainer requests will extend jail stays by significantly more than 48 hours.

The aforementioned studies provide preliminary evidence that ICE detainers have a notable impact on jail stays, and hence impose significant costs on local governments. However, only one of these reports took into account some of the legal factors that, along with ICE detainers, may influence the amount of time arrestees spend in jail. For example, if inmates with ICE detainers also have more charges or more serious charges than other inmates, these differences may account for some or all of their extended jail stays. It is important to control for these legal factors in order to isolate the impact of ICE detainer requests on the amount of time arrestees spend in jail.

This report analyzes jail booking and release data provided by King County jail administrators to assess how ICE detainer requests impact the amount of time people spend in jail. The dataset includes all people who were released from an adult King County jail facility in 2011 and were either charged with a crime or released after prosecutors did not file charges. Our analysis compares the average jail stay for people with and without ICE detainers, and uses statistical regression techniques to isolate the unique impact of ICE detainer requests (over and above other legal factors) on the length of jail stays. We also estimate the cost to local governments of honoring ICE detainer requests, and the potential cost-savings that would accrue if they ceased to do so.

KEY FINDINGS

➤ Honoring ICE detainer requests significantly extends jail stays.

- The average jail stay for people subject to ICE detainer requests was 29.2 days longer than for people not subject to ICE detainer requests.
- Among those charged with a felony offense, ICE detainer requests added 60.8 days to the average jail stay.
- For those whose most serious charge was a misdemeanor, ICE detainer requests added more than seven days to the typical jail stay.

¹³ See, for example, Greene *op.cit.*

¹⁴ National Immigration Forum, *op. cit.*

- Regression analyses indicate that ICE detainers significantly extend jail stays – by 161% – even after taking the number of charges, and the nature and seriousness of the most serious charge, into account.

➤ **ICE detainers mainly target people without serious criminal charges and histories.**

- The most serious criminal charge against approximately half (50.7%) of the inmates with ICE detainer requests was a misdemeanor offense.
- Approximately one-eighth (13%) of the people subject to ICE detainer requests were not charged with a crime prior to their transfer to ICE.¹⁵
- Four out of five people flagged by ICE had never been convicted of a crime against a person in Washington State; a similar ratio had never been convicted of a felony in the state.

➤ **Honoring ICE detainer requests has a pronounced impact on the county's Latino population.**

- More than one in four (28.7%) of the people who entered jail and were identified as Hispanic were transferred to the custody of ICE upon their release.
- Nearly all (96.2%) of the individuals flagged by ICE were transferred to its custody upon their release from jail.

➤ **Honoring ICE detainer requests consumes significant local resources.**

- Honoring ICE detainer requests cost local governments nearly \$3 million in jail costs alone in 2011.
- Not honoring ICE detainer requests would save local governments approximately \$1.8 million in jail costs each year.¹⁶

¹⁵ The jail data indicate whether released individuals were subject to an ICE detainer request and whether they were released via a transfer of custody, but do not identify not the agency to which the released person was transferred. In the remainder of this report we assume that people subject to ICE detainer requests and transferred upon release were transferred to the custody of ICE.

¹⁶ In 2011 dollars.



The Cost of Responding to Immigration Detainers in California

PRELIMINARY FINDINGS

August 22, 2012

Judith A. Greene

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Introduction

Los Angeles County began its participation in the Secure Communities deportation program on August 27, 2009, making it one of the first jurisdictions in America where the program, also known as S-Comm, was activated. Like the program itself, LA County's participation started with little fanfare but has since been riddled with controversy. As S-Comm deployment has been expanded throughout California, it has come under fire for its failure to achieve stated priorities, its damaging effect on community policing, and its role in multiple civil rights violations including racial profiling of Latinos, the criminalization of immigrants, and the illegal detention of U.S. Citizens by U.S. Immigration and Customs Enforcement (ICE).

While S-Comm has become a proxy flashpoint for the broader debate about immigration reform, all sides agree that the Department of Homeland Security (DHS) has been overly secretive about every aspect of the program. Indeed, DHS's own internal reviews have acknowledged the agency's fault in creating confusion about the program.

As more data and details about S-Comm have become available, many local jurisdictions have sought to mitigate its harms. Some states like New York, Illinois, and Massachusetts tried to leave the program entirely, but they were forced to participate by DHS. Recently, multiple local jurisdictions, including Cook County, Illinois and Washington, DC, have passed legislation to limit local compliance with immigration detainers. Immigration detainers are the mechanism through which S-Comm seeks to detain immigrants in local jails in order to facilitate transfer ICE for deportation proceedings. California is considering legislation known as the TRUST Act (AB 1081) to ensure that immigrants who pose no threat to public safety are not incarcerated at local taxpayer expense.

This report attempts to shed light on one issue: the fiscal cost borne on local jurisdictions by S-Comm. Data released by the Los Angeles County Sheriff Office – only after it was compelled to provide it through litigation¹ – show an enormous potential cost savings to the county and to the

¹ Editorial, "Baca Should Release Jail Records," *Los Angeles Times*, August 21, 2012.

state if detention of immigrants would be limited. More data is required to ascertain the full fiscal impact of S-Comm. But, as this report makes clear, S-Comm is an expensive burden that Los Angeles, and California, can ill afford:

- **Los Angeles County taxpayers spend over \$26 million per year to detain immigrants for ICE.**
- **Individuals in Los Angeles County custody who are subject to immigration detainers spend, on average, 20.6 extra days in county custody.**
- **California taxpayers spend an estimated \$65 million annually to detain immigrants for ICE.**

The Number of People Released to ICE

According to data records compiled by the Los Angeles County Sheriff's Department, 5,184 people who were booked into the jail system during the first three months of 2011 were handed over to ICE, the deportation enforcement arm of the Department of Homeland Security.² Using these figures, it is possible to estimate that over a year's time, 20,736 County Jail prisoners will be released into ICE custody.

Additional Days in Detention

The average length of stay for people who were released from the Los Angeles County Jail to ICE custody was 32.3 days, while the average length of stay for all other individuals released was just 11.7 days. This prolonged detention of 20.6 days should not be surprising, since other studies have found similar patterns.³

The primary cause of the additional time in custody is the immigration detainer, also known as an "ICE hold." Immigration detainers are issued by ICE for suspected noncitizens. The term "detainer" may be misleading. In the criminal justice context, a detainer is generally issued by a law enforcement agency after pending charges have been approved by a judge.

In the immigration context, a detainer is not a warrant issued or approved by a judge. It is simply a non-binding request, issued by an administrative ICE officer, which requests that jail personnel hold an individual for an additional 48 hours, excluding weekends and holidays, after

² The data used in this analysis were obtained from the Los Angeles Sheriffs Department by the National Day Labor Organizing Network, the National Immigration Law Center, and the Coalition for Humane Immigrant Rights of Los Angeles through a public records request. Of 115,330 individuals booked into the jail system during the first quarter of 2011, release dates were not provided for a relative handful (440). Those cases with missing release dates were excluded from the analysis.

³ Andrea Guttin, "The Criminal Alien Program: Immigration Enforcement in Travis County, Texas," *Immigration Policy Center* (Feb. 2010); Aarti Shahani, "New York City Enforcement of Immigration Detainers, Preliminary Findings" *Justice Strategies* (Oct. 2010), available at http://www.justicestrategies.org/sites/default/files/JusticeStrategies-DrugDeportations-PrelimFindings_0.pdf.

they would otherwise be released, in order to give ICE extra time to take them into federal custody.⁴

An ICE detainer can affect length of stay in two ways. First, once a detainer is lodged, both court and jail officials may consider the person to be ineligible for pretrial release, even if they are charged with a low-level non-violent charge and have well-established ties to their home communities. For example, it appears to be the practice of the Los Angeles County Sheriffs' Department to refuse to release on bail any individual who is subject to an ICE detainer.⁵ Second, while ICE detainers expire after 48 hours, many jailers will hold detainees for days or weeks longer until an ICE agent arrives to take custody.⁶

Estimating the Cost of Additional Detention for Los Angeles County Taxpayers

The additional 20.6 days spent in custody by people before they are released to ICE places a huge and largely unnecessary burden on taxpayers. The current cost per prisoner in the Los Angeles County Jail is reported to be \$113 per day. Using that figure, the added cost of holding people for ICE would be more than \$48 million annually.

But that figure could be larger than the actual cost, because such figures are typically derived by simply dividing the total jail budget by the number of people held in custody. Without detailed information about the marginal costs incurred (or saved) when more (or fewer) people are confined, it is not possible to accurately estimate a true per diem cost. Yet a more conservative – and likely more realistic – per diem cost is available when jails are filled to capacity and jailers are considering “out-sourcing” custody of their prisoners to other jurisdictions.

Under California's “realignment” policy, designed to reduce prison overcrowding, thousands of people who would previously have been incarcerated in California state prisons have been shifted to county-level correctional systems. California's county jails are sorely stretched for space to house the volume of people who are now committed to local confinement in their jurisdictions. During the first quarter 2012, almost 13,000 people were released from the jails every month due to lack of space.⁷

In July, senior staff at the Los Angeles Sheriff's Department were engaged in discussions with

⁴ See, e.g., *Buquer v. City of Indianapolis*, 797 F.Supp.2d 905, 911 (S.D. Ind. 2011) (“A detainer is not a criminal warrant, but rather a voluntary request that the law enforcement agency ‘advise [DHS], prior to release of the alien, in order for [DHS] to arrange to assume custody.’”) (quoting 8 C.F.R. § 287.7(a)); Letter from David Venturella, Assistant Director, Secure Communities to Miguel Marquez, Santa Clara County Counsel, available at <http://media.sjbeez.org/files/2011/10/4-ICE-response-to-SCC.pdf> (“ICE views an immigration detainer as a request . . .”).

⁵ See, e.g., Richard Rushfield, “Duncan Roy: Director Trapped in Men's Central Jail,” *LA Weekly*, Apr 5 2012 (“[W]hen ICE requests that a person granted bail be held briefly until ICE can pick them up, the [Los Angeles] Sheriff's Department interprets this as allowing deputies to ignore court orders granting bail.”)

⁶ “Immigrants Behind Bars: How, Why, and How Much.” *National Immigration Forum*, (March 2011), available at www.immigrationforum.org/.../Immigrants_in_Local_Jails.pdf

⁷ Facility Standards and Operations Division. “Jail Profile Survey” for 1st Quarter, 2011. Corrections Standards Authority, available at <http://www.bscc.ca.gov/programs-and-services/cpp/resources/jail-profile-survey>

officials in several Central Valley communities about housing people classified as “low-level” in their jails. It is estimated that contracting with detention facilities in Kern County for custody of Los Angeles County prisoners will cost \$61 per day for each person transferred.⁸ Using that figure, it can be conservatively estimated that the additional days that people with ICE detainees are held in the Los Angeles County Jail system before release could incur more than \$26,041,000 in added costs over a year’s time.

A State-wide Estimate

Statistical records compiled by California’s Corrections Standards Authority indicate that 1,096,899 people were booked into the state’s county jails in 2011.⁹ Assuming that the data patterns we see in Los Angeles are roughly applicable state wide, 51,833 of them would have been held for more than 20 additional days before being released to ICE custody, at an added cost to taxpayers of more than \$65 million.

Conclusion

Los Angeles County and the State of California are spending tremendous amounts of tax-payer dollars to detain immigrants for civil immigration violations. A conservative estimate places this cost at \$26 million annually for Los Angeles County alone. The cost to California taxpayers of holding people for ICE is estimated to be more than \$65 million.

⁸ Andrew Blankstein and Jason Song, “Sheriff looks to Central Valley to hold L.A. County jail overflow.” *Los Angeles Times*, July 10, 2012

⁹ Facility Standards and Operations Division. “Jail Profile Surveys” for 1st through 4th Quarters, 2011. Corrections Standards Authority, available at <http://www.bscc.ca.gov/programs-and-services/cpp/resources/jail-profile-survey>

Select Language ▼

Multnomah County

Secure Communities, immigration detainers and Multnomah County FAQ

Q: What is the Secure Communities Program?

A: The Secure Communities program is an existing federal information-sharing partnership between Immigration Customs and Enforcement (ICE) and the Federal Bureau of Investigation (FBI). The program helps to identify undocumented foreign nationals through state and local law enforcement. In fiscal year 2012, an estimated 409,849 people were deported nationally and in calendar year 2012 approximately 431 people were released to ICE from Multnomah County Jail.

At booking, most local authorities automatically share information of people they have in custody, such as fingerprints, with the Oregon State Police and FBI. This information is used by the FBI to determine if the person held in custody has a criminal record.

Under Secure Communities, the FBI automatically takes the additional step of sending the fingerprints to ICE, the investigative arm of the Department of Homeland Security (DHS) to check against its immigration databases. If these checks reveal that an individual is unlawfully present in the United States or otherwise removable due to a criminal conviction, ICE can take enforcement action.

Q: Does local law enforcement have to sign up to participate in ICE's Secure Communities Program?

A: No. Most local law enforcement agencies have agreements with their state police to share information. Most state police have agreements for sharing data with the FBI.

In most cases, Secure Communities is automatically and involuntarily involved in the already-existing communications infrastructure and agreements between state law enforcement, the FBI and DHS.

Q. Can local law enforcement “opt out” of the Secure Communities program?

A: Whether local law enforcement can “opt out” is unclear. This question is being litigated by a few governments and in ongoing court cases nationally. What is clear is that most jurisdictions are automatically sharing information and fingerprints with ICE involuntarily, as a result of the Secure Communities partnership with the FBI and DHS.

Q. Once ICE has received biometric information that identifies an undocumented foreign national as present in the county jail, how does ICE take custody of that person?

A: ICE can take direct action by requesting that a local jurisdiction hold an individual through an I-247 immigration detainer.

An I-247 detainer alerts a law enforcement agency that DHS is seeking custody of an undocumented

foreign national in the custody of that agency, in order to arrest and remove that person:

“The detainer is a request that, such agency advise the Department [of Homeland Security], prior to release of the alien, in order for the Department to arrange to assume custody, in situations when gaining immediate physical custody is either impracticable or impossible.”[i]

Any authorized immigration officer may at any time issue an I-247 immigration detainer-notice of action, to any other federal, state, or local law enforcement agency:

“[S]uch agency shall maintain custody of the alien for a period not to exceed 48 hours, excluding Saturdays, Sundays, and holidays in order to permit assumption of custody by [DHS].”[ii]

Q. Is the detainer a mandatory order or a formal request?

A: According to DHS, the I-247 Immigration detainer is a formal request.

Q: Is the formal request mandatory? Can a county sheriff refuse to comply with the detainer request?

A: The Multnomah County Chair’s Office, the Office of the Multnomah County Sheriff and the Multnomah County Attorney’s office have asked Local ICE and DHS representatives since June 19, 2012, if the I-247 Detainer request is mandatory. Other jurisdictions have also asked for clarification on this issue.

To date, the county has not received that requested legal clarification from local ICE offices or from DHS. Legal precedence in this matter is varied and not conclusive.

Q: Who at the Multnomah County is responsible for the policies and management of Multnomah County Jails?

A: The sheriff is the sole individual charged with the administration of Multnomah County jails pursuant to Multnomah County Charter § 6.50, and Multnomah County Code § 15.001 and has custody and control of all persons confined to county correctional facilities pursuant to ORS § 169.320.

Q: Has the Multnomah County Sheriff “opted out” of the Secure Communities program?

A: Our best research indicates no local authority can “opt in” or “opt out” of the Secure Communities Program. The program runs whether or not a local law enforcement agency has consented to participate.

Q: Has the Multnomah County Sheriff refused to comply with I-247 detainer requests?

A. The Multnomah County Sheriff’s Office will comply with I-247 detainer requests, when an individual is booked in a Multnomah County jail with a charge for a:

Felony as defined by ORS (Oregon Revised Statute)

Class A - Person Misdemeanor as established by the Oregon Criminal Justice Commission - OAR §213-003-001(15)

Or when ICE:

- Presents a warrant of arrest from removal proceedings
- Presents an order for deportation or removal from the United States

Or when ICE presents an affidavit attesting to:

- A felony conviction or a non immigration related felony charge
- Three or more misdemeanor convictions
- A prior misdemeanor conviction or current charge for an offense involving:
 - violence, threats, or assaults
 - sexual abuse or exploitation
 - driving under the influence of alcohol or a controlled substance
 - unlawful possession of a firearm or other deadly weapon
 - or the distribution or trafficking of a controlled substance
- A significant risk to national security, border security, or public safety
- Initiated removal proceedings and a notice to appear.

The Multnomah County Sheriff's Office will not comply with I-247 detainer requests for individuals, who:

- Have been convicted of illegal entry pursuant 8 U.S.C. § 1325
- Have illegally re-entered the country after previous removal or return (felony)
- Have been found by an immigration officer or an immigration judge to have knowingly committed immigration fraud.

Q: Does ICE have a fiscal obligation to Multnomah County? Does ICE pay for the jail beds and administrative costs of its immigration detainer requests?

A: According to the regulation proclaimed by the Department of Homeland Security, "No detainer issued as a result of a determination made under this chapter shall incur any fiscal obligation on the part of the Department [of Homeland Security], until actual assumption of custody by the Department [of Homeland Security]..."[iii]

ICE does not pay for the jail beds and administrative costs for immigration detainer requests. The uncompensated detention of individuals in county jails for violations of civil immigration laws places an undue burden on the county, during already difficult budget times. The unmitigated compliance with ICE's I-247 prisoner detainer requests has the potential to further strain the resources of the Multnomah County Sheriff's Office. Occupying scarce and costly jail beds should be reserved for those who pose the greatest threat to public safety.

Q: What does it cost the Multnomah County to comply with an I-247 immigration detainer request?

A: (TBD Research in the works)

[i] 8 C.F.R. § 287.7 Detainer provisions under section 287(d)(3)(a) of the Act.

Title 8 - Aliens and Nationality

[ii] 8 C.F.R. § 287.7 Detainer provisions under section 287(d)(3)(d) of the Act.

Title 8 - Aliens and Nationality

[iii] 8 C.F.R. § 287.7 Detainer provisions under section 287(d)(3)(e) of the Act.

Title 8 - Aliens and Nationality

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002/002

08/10/2011 WED 14:30 FAX 7178607294

Office of Enforcement and Removal Operations
Philadelphia

U.S. Department of Homeland Security
1600 Callowhill Street
Philadelphia, PA 19130



**U.S. Immigration
and Customs
Enforcement**

August 10, 2011

Warden Brian Clark
Adams County Prison
45 Major Bell Lane
Gettysburg, PA 17325

Warden Clark,

Please consider this letter as a reminder that under 8 CFR 287.7, an Immigration detainer (form I247) only authorizes an institutional facility to hold an alien for a period of time, **NOT TO EXCEED 48 HOURS**, excluding Saturdays, Sundays and Holiday, beyond the time when subject would have otherwise been released from your custody to allow DHS to take custody of the subject. An Immigration detainer does not authorize you to hold a subject beyond these 48 hours. As early as possible, prior to the time you would otherwise release the subject, please notify this office at (717) 840-7286 by fax to (717)755-3576 or by email to CAP.PHI@dhs.gov. If you cannot reach this office at any of the above numbers please contact the Immigration and Customs Enforcement, Law Enforcement Support Center in Burlington, VT at (802) 872-6020.

For those facilities which are authorized to house aliens under an Intergovernmental Service Agreement (IGSA), an alien may be detained beyond the 48 hours only when the alien is turned over to ICE custody with the issuance of an ICE form I-203, Order to Detain Alien.

Thank you for your cooperation in this matter. Please do not hesitate to contact Supervisory Detention and Deportation Officer Joseph Dunn at (717)840-7292 if you have any additional questions.

Sincerely,

Thomas Decker
Field Office Director

¡Diga NO a la Poli-Migra en Su Comunidad!

¿En qué consiste la petición de detención (ICE-hold)?

Lea la conversación entre Doña Juana y Don Vicente...



SEÑOR ALCALDE,
Los llamados ICE-Holds no son mandatorios
¡Usted y el Concejo Municipal puede decir NO!

Créditos:
Texto:
Sarahí Uribe
Jacinta González
Pablo Alvarado

Diseño Gráfico:
Marco Loera
Pablo Alvarado

Ilustraciones:
Alfredo Burgos



Oiga Don Vicente, esto de las deportaciones cada día se pone más de color hormiga. En mi barrio por ejemplo han aumentado las capturas por ese motivo. ¿No sé qué hacer?



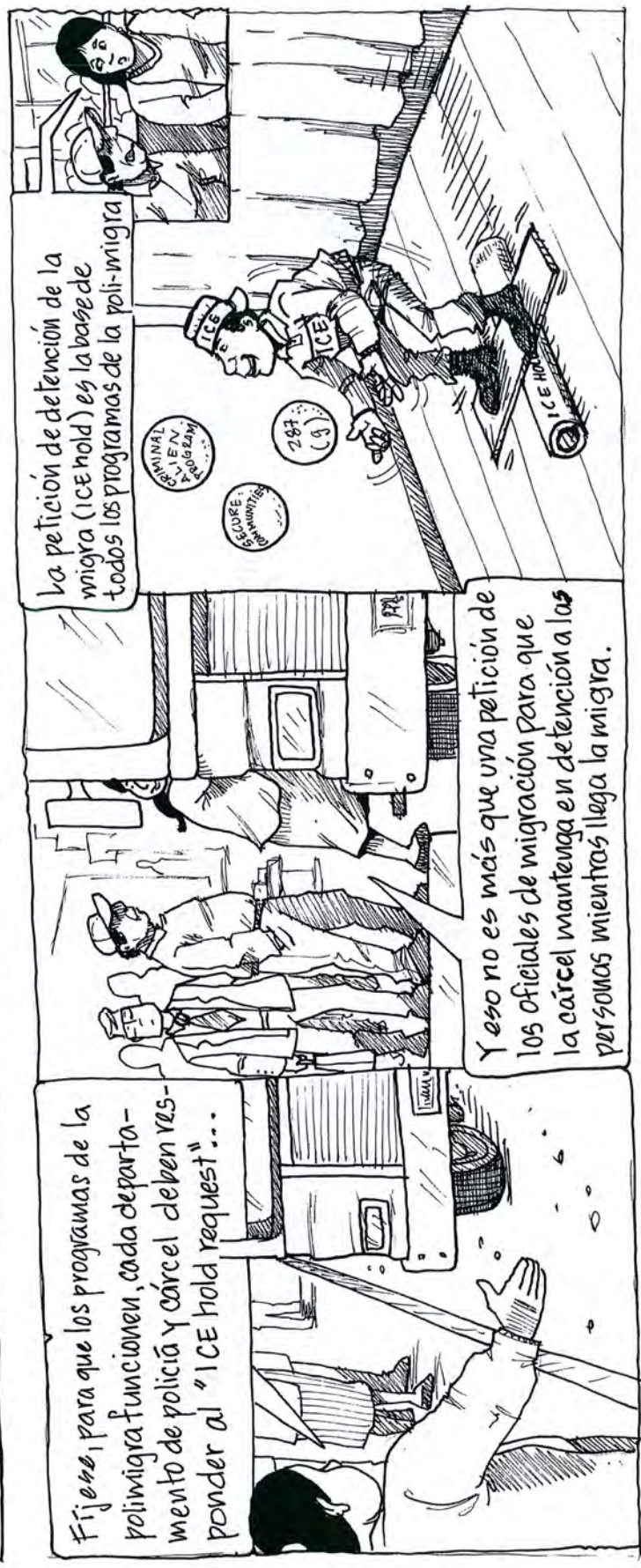
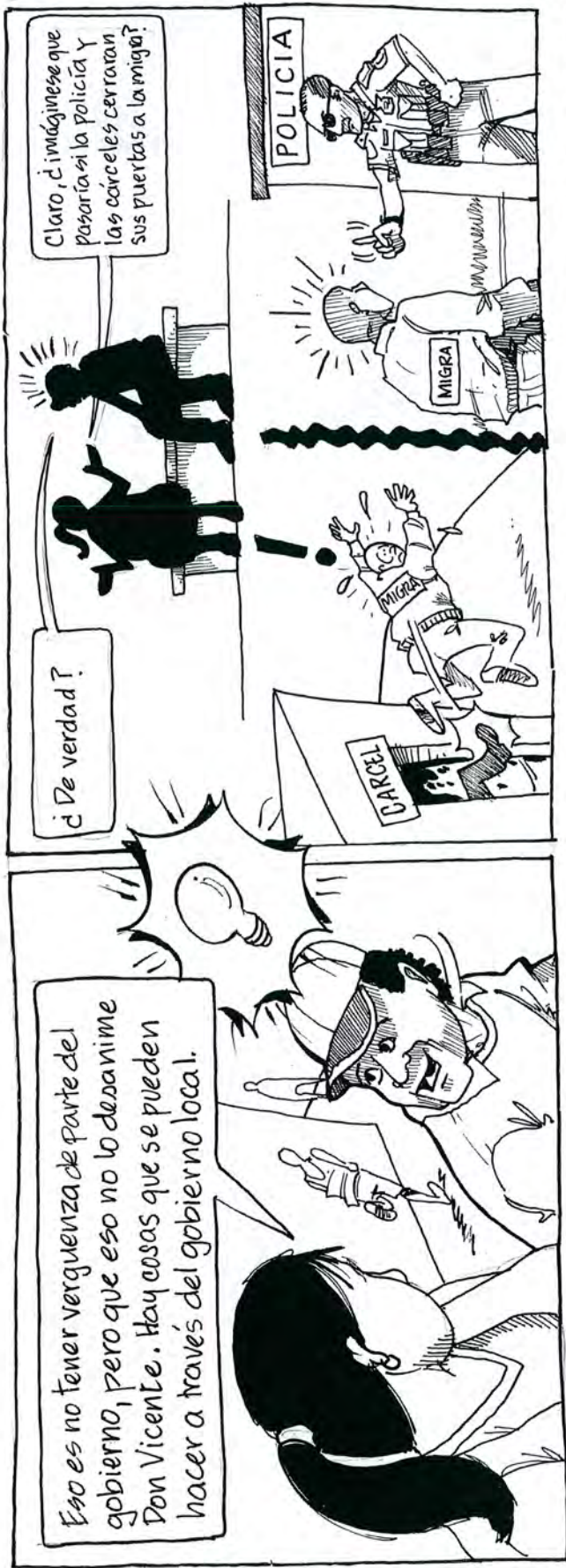
Ahora con tanto programa de deportación como "Comunidades Seguras" la poli-migra está por todos lados. Lo que le sucedió a Doña Margarita ya lo sabe...

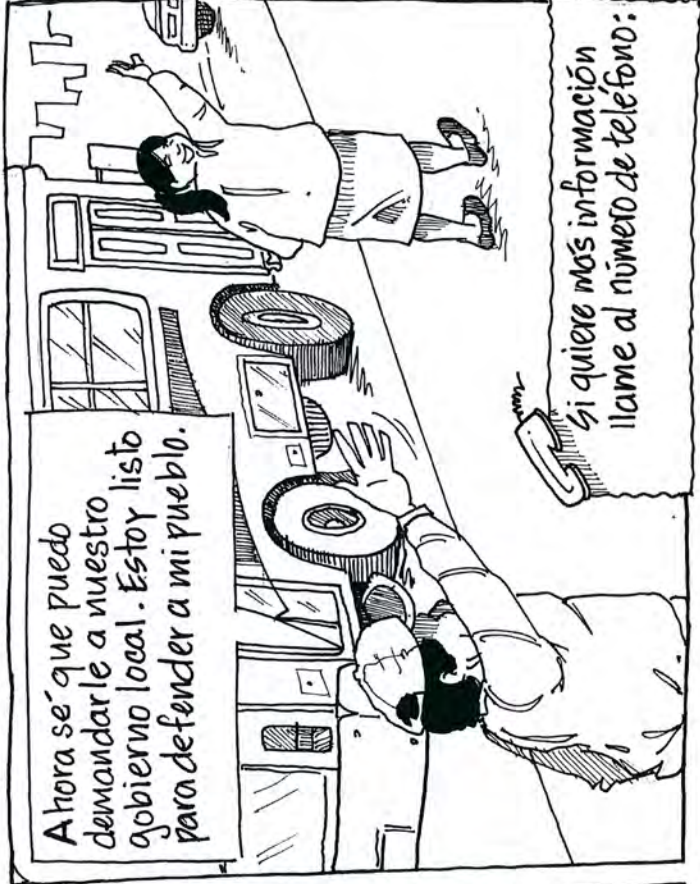


Le arrestaron por manejar sin licencia de conducir y la van a entregar a la migra.

¡Qué triste! Pero, qué se puede hacer. El Gobierno Federal va a implementar los programas de deportación en cada ciudad y estado del país.







AUG 23 2012



U.S. Immigration and Customs Enforcement

Ms. Julie Kirchner
Executive Director
Federation for American Immigration Reform
25 Massachusetts Avenue NW, Suite 330
Washington, D.C. 20001

Dear Ms. Kirchner:

Thank you for your July 17, 2012 letter regarding the trend of certain jurisdictions adopting policies or legislation to not honor U.S. Immigration and Customs Enforcement (ICE) immigration detainers. The U.S. Department of Homeland Security (DHS) and ICE share your concerns that such policies undermine public safety and hinder ICE's ability to enforce the nation's immigration laws.

ICE has explained to jurisdictions such as Cook County, Illinois, that by ignoring ICE detainers they are undermining public safety in their communities by exposing their local communities to risks from suspected and convicted sex offenders, weapons violators, drunk drivers, and other violent criminals. These are not hypothetical risks. ICE is aware of some of the additional crimes being committed by these recidivist criminal aliens after such jurisdictions have chosen to release them back into their communities rather than into federal custody. These crimes include the possession of a controlled substance, money laundering, burglary, spousal battery, aggravated driving under the influence, and even attempted murder. The gravity of Cook County's actions was highlighted in very real terms in a *Chicago Tribune* article about the case of Saul Chavez, an alien who was charged with killing a pedestrian while driving intoxicated. Mr. Chavez fled Cook County after the county released him on bond, despite the fact that an ICE detainer had been lodged against him.

In addition to undermining public safety, policies that restrict compliance with immigration detainers may also violate federal law. The Immigration and Nationality Act provides that a "local government entity...may not prohibit, or in any way restrict, any government entity or official from sending to, or receiving from, [ICE] information regarding the citizenship or immigration status, lawful or unlawful, of any individual." See 8 U.S.C. § 1373(a). This provision is designed to ensure that ICE's ability to enforce immigration law in our communities is not unduly obstructed by state or local laws or policies. The policies enacted by such jurisdictions prohibit their personnel from responding to ICE inquiries or communicating with ICE regarding an individual's incarceration status or release date.

Since such policies have been enacted in certain jurisdictions, ICE has lodged hundreds of detainers against removable aliens in their custody who have been charged with or convicted of a crime or multiple crimes, including serious and violent offenses. None of these detainers

have been honored by these jurisdictions. This has prevented ICE from removing these aliens without their being released back into the community. Of those released back into the community, ICE has been able to independently locate and arrest only a few.

In a related matter, many of these jurisdictions continue to submit requests for State Criminal Alien Assistance Program (SCAAP) funding to the U.S. Department of Justice (DOJ). Under the auspices of SCAAP, the federal government, through DOJ, reimburses jurisdictions for the cost of detaining criminal aliens. In administering SCAAP, DOJ requires DHS to verify the immigration status of inmates for whom state and local agencies seek reimbursement. Without access to these jails, ICE's ability to accurately verify the immigration status of criminal aliens detained becomes extraordinarily difficult—as evidenced by this year's SCAAP validation process during which ICE was able to validate all fiscal year 2012 SCAAP requests received from DOJ except for the submissions from Cook County, Illinois, and Santa Clara County, California—and may result in a denial of reimbursement to the state for costs of incarcerating criminal aliens under SCAAP. Moreover, it is fundamentally inconsistent for such jurisdictions to continue to request federal reimbursement for the cost of detaining aliens who commit or are charged with crimes while at the same time thwarting ICE's efforts to remove those very same aliens from the United States.

Because of the gravity of these concerns, ICE has requested that jurisdictions with restrictive detainer legislation and ordinances amend their policies to avoid any legal conflict with federal law and to restore sensible cooperation with ICE, particularly when it comes to identifying and removing criminal and recidivist criminal aliens incarcerated in their jails. DHS and ICE are committed to ensuring the safety of American communities and will continue to consider all options, both financial and legal, to encourage such jurisdictions to honor ICE detainers.

Thank you again for your letter and your support on this issue.

Sincerely yours,

A handwritten signature in black ink, appearing to read "John Morton", with a long horizontal flourish extending to the right.

John Morton
Director

FY 2012 SCAAP

State	Applicant Name	Final Award Amount
AK	Alaska Department of Corrections	\$43,691.00
AL	Tuscaloosa County Commission	\$410.00
AL	County of Coffee	\$4,474.00
AL	County of DeKalb	\$8,083.00
AL	County of Montgomery	\$21,367.00
AL	Alabama Department of Corrections	\$147,820.00
AR	Arkansas Department of Community Correction	\$638.00
AR	County of Polk	\$797.00
AR	County of Hempstead	\$2,226.00
AR	County of Pope	\$3,818.00
AR	County of Sebastian	\$19,006.00
AR	County of Benton	\$23,146.00
AR	County of Pulaski	\$33,870.00
AR	County of Washington	\$77,592.00
AR	Arkansas Department of Correction	\$355,034.00
AS	American Samoa	\$6,421.00
AZ	County of Graham	\$3,458.00
AZ	County of Apache	\$4,883.00
AZ	Coconino County	\$6,936.00
AZ	Gila County	\$9,700.00
AZ	Mohave County	\$10,077.00
AZ	County of Navajo	\$16,230.00
AZ	Santa Cruz County	\$40,000.00
AZ	County of Yavapai	\$41,853.00
AZ	Yuma County	\$84,202.00
AZ	Pinal County	\$104,266.00
AZ	County of Pima	\$247,571.00
AZ	Maricopa County	\$1,281,403.00
AZ	State of Arizona	\$6,647,908.00
CA	County of Amador	\$1,292.00
CA	Inyo County	\$2,102.00
CA	County of Plumas	\$3,100.00
CA	County of Calaveras	\$3,586.00
CA	County of Mariposa	\$4,862.00
CA	Trinity County	\$6,140.00
CA	County of Tuolumne	\$10,035.00
CA	Colusa County	\$12,632.00
CA	Siskiyou County	\$14,610.00
CA	County of Shasta	\$15,244.00
CA	County of Lake	\$16,081.00
CA	Imperial County	\$19,634.00
CA	County of Nevada	\$22,827.00
CA	GLENN COUNTY	\$26,529.00
CA	County of Humboldt	\$28,503.00
CA	County of Mono	\$28,716.00
CA	El Dorado County	\$32,884.00
CA	County of Sutter	\$40,757.00
CA	County of Tehama	\$45,608.00
CA	Kings County	\$46,949.00
CA	Napa County	\$50,463.00
CA	County of Mendocino	\$75,498.00
CA	County of Placer	\$78,189.00

CA	San Benito County	\$79,441.00
CA	County of Yolo	\$79,512.00
CA	SANTA CRUZ COUNTY	\$118,685.00
CA	San Joaquin County	\$141,534.00
CA	County of Yuba	\$147,696.00
CA	County of Merced	\$162,087.00
CA	County of San Luis Obispo	\$166,793.00
CA	COUNTY OF STANISLAUS	\$223,950.00
CA	County of Solano	\$262,925.00
CA	Santa Barbara County	\$359,289.00
CA	County of Contra Costa	\$458,831.00
CA	County of Sonoma	\$461,476.00
CA	County of Fresno	\$468,562.00
CA	City and County of San Francisco	\$472,808.00
CA	Marin County	\$478,557.00
CA	County of Monterey	\$576,479.00
CA	COUNTY OF VENTURA	\$669,914.00
CA	County of Tulare	\$734,292.00
CA	County of San Mateo	\$779,600.00
CA	Alameda County	\$798,038.00
CA	County of Riverside	\$802,360.00
CA	County of Santa Clara	\$914,006.00
CA	County of San Bernardino	\$941,715.00
CA	County of Sacramento	\$1,025,244.00
CA	County of San Diego	\$1,174,616.00
CA	County of Orange	\$2,376,992.00
CA	Los Angeles County	\$6,251,571.00
CA	State of California	\$51,229,996.00
CO	COUNTY OF BENT	\$630.00
CO	COUNTY OF FREMONT	\$888.00
CO	County of Teller	\$1,061.00
CO	County of Washington	\$1,237.00
CO	County of Chaffee	\$1,394.00
CO	County of Sedgwick	\$1,414.00
CO	Lincoln County	\$3,747.00
CO	Moffat County	\$4,059.00
CO	County of Alamosa	\$4,253.00
CO	County of Yuma	\$4,476.00
CO	Clear Creek County	\$4,774.00
CO	Elbert County	\$5,321.00
CO	Montezuma County	\$5,514.00
CO	County of Routt	\$6,236.00
CO	County of Prowers	\$6,601.00
CO	County of Delta	\$7,892.00
CO	San Miguel County	\$11,942.00
CO	County of Gunnison	\$12,242.00
CO	La Plata County	\$14,949.00
CO	Gilpin County	\$15,249.00
CO	County of Morgan	\$21,602.00
CO	County of Pitkin	\$26,959.00
CO	County of Montrose	\$31,744.00
CO	Summit County	\$37,831.00
CO	County of Pueblo	\$48,392.00
CO	Mesa County	\$60,248.00
CO	County of Larimer	\$83,959.00
CO	Jefferson County	\$95,441.00

CO	El Paso County	\$110,294.00
CO	County of Adams	\$119,361.00
CO	County of Boulder	\$125,414.00
CO	Garfield County	\$126,640.00
CO	County of Arapahoe	\$148,789.00
CO	County of Weld	\$239,626.00
CO	City and County of Denver	\$323,166.00
CO	State of Colorado	\$2,251,529.00
CT	State of Connecticut Department of Correction	\$1,009,263.00
DE	Delaware Department of Correction	\$74,117.00
FL	COUNTY OF GILCHRIST	\$780.00
FL	County of Taylor	\$1,508.00
FL	County of Madison	\$2,578.00
FL	County of Nassau	\$4,536.00
FL	Charlotte County	\$5,302.00
FL	Hernando County	\$5,789.00
FL	Putnam County	\$5,790.00
FL	County of Suwannee	\$8,294.00
FL	COUNTY OF GADSDEN	\$9,016.00
FL	Okaloosa County Board of County Commissioners	\$10,106.00
FL	County of Okeechobee	\$12,753.00
FL	Hendry County	\$16,700.00
FL	County of Clay	\$24,341.00
FL	County of Desoto	\$24,502.00
FL	Sumter County	\$26,716.00
FL	County of Hardee	\$28,535.00
FL	Alachua County	\$29,110.00
FL	Highlands County	\$30,561.00
FL	COUNTY OF POLK	\$33,576.00
FL	Leon County	\$35,912.00
FL	Osceola County Board of County Commissioners	\$36,504.00
FL	Marion County Board of County Commissioners	\$43,096.00
FL	County of Volusia	\$43,967.00
FL	Pasco County	\$49,560.00
FL	Seminole County	\$52,509.00
FL	Lake County	\$53,587.00
FL	Miami Dade County	\$59,120.00
FL	County of Sarasota	\$71,602.00
FL	County of Brevard	\$72,708.00
FL	county of indian river	\$78,306.00
FL	City of Jacksonville	\$79,369.00
FL	Manatee County	\$88,450.00
FL	Pinellas County	\$131,619.00
FL	County of Martin	\$132,273.00
FL	St Lucie County	\$136,236.00
FL	Orange County	\$137,647.00
FL	County of Lee	\$151,775.00
FL	Broward County	\$169,245.00
FL	Collier County	\$280,583.00
FL	County of Hillsborough	\$382,615.00
FL	Palm Beach County	\$403,000.00
FL	State of Florida	\$9,842,541.00
GA	County of Crisp	\$112.00
GA	Harris County	\$1,143.00
GA	County of Greene	\$1,519.00
GA	Bibb County Board of Commisioners	\$2,213.00

GA	Lee County Board Of Commissioners	\$2,249.00
GA	Fannin County	\$2,967.00
GA	Pickens County	\$4,371.00
GA	County Of Monroe	\$4,946.00
GA	County of Gilmer	\$6,255.00
GA	Walton County	\$6,314.00
GA	Carroll County	\$7,285.00
GA	County Of Newton	\$9,322.00
GA	Fulton County	\$11,582.00
GA	County of Douglas	\$25,593.00
GA	County of Houston	\$26,166.00
GA	County of Floyd	\$27,337.00
GA	Forsyth County Government	\$28,108.00
GA	County of Muscogee	\$28,408.00
GA	Coweta County	\$30,236.00
GA	County of Whitfield	\$34,128.00
GA	Henry County Board of Commissioners	\$46,929.00
GA	County Of Clarke	\$47,374.00
GA	County of Chatham	\$58,759.00
GA	Hall County	\$74,050.00
GA	County of Cherokee	\$75,335.00
GA	Gwinnett County	\$101,242.00
GA	Cobb County	\$110,588.00
GA	County of Clayton	\$128,128.00
GA	DeKalb County Georgia	\$182,831.00
GA	Criminal Justice Coordinating Council	\$1,210,502.00
GU	Government of Guam	\$398,111.00
HI	State of Hawaii	\$197,222.00
IA	Jefferson County	\$352.00
IA	County of Mahaska	\$3,145.00
IA	HENRY COUNTY	\$3,454.00
IA	Crawford County	\$5,872.00
IA	County of Scott	\$8,501.00
IA	County of Muscatine	\$11,222.00
IA	County of Story	\$12,328.00
IA	County of Black Hawk	\$21,964.00
IA	Johnson County	\$43,833.00
IA	Woodbury County	\$54,491.00
IA	State of Iowa	\$229,911.00
ID	County of Owyhee	\$520.00
ID	County of Power	\$875.00
ID	Madison County	\$1,154.00
ID	County of Bannock	\$3,120.00
ID	Elmore County	\$3,717.00
ID	Jefferson County	\$4,771.00
ID	Bingham County	\$5,017.00
ID	County of Gooding	\$8,251.00
ID	County Of Twin Falls	\$10,916.00
ID	County of Ada	\$16,901.00
ID	County of Jerome	\$17,299.00
ID	Bonneville County	\$23,085.00
ID	County of Blaine	\$26,856.00
ID	Canyon County	\$44,710.00
ID	Idaho Department of Correction	\$193,598.00
IL	Iroquois County	\$1,317.00
IL	Stephenson County	\$1,717.00

IL	County of Sangamon	\$2,918.00
IL	Macon County	\$3,314.00
IL	Jo Daviess County	\$4,034.00
IL	County of Henry	\$4,531.00
IL	County of Bureau	\$5,121.00
IL	County of McLean	\$6,161.00
IL	County of Ogle	\$7,262.00
IL	County of Peoria	\$9,609.00
IL	County of LaSalle	\$10,104.00
IL	County of Rock Island	\$11,210.00
IL	DeKalb County	\$21,739.00
IL	Champaign County	\$27,348.00
IL	County of Kendall	\$30,967.00
IL	Winnebago County	\$56,130.00
IL	County of McHenry	\$88,886.00
IL	County of Lake	\$124,385.00
IL	County of Will	\$137,267.00
IL	DuPage County	\$275,695.00
IL	County of Kane	\$358,776.00
IL	County of Cook	\$1,719,072.00
IL	Illinois Department of Corrections	\$5,699,741.00
IN	Noble County	\$1,417.00
IN	County of Porter	\$1,733.00
IN	Johnson County	\$2,975.00
IN	County of Grant	\$4,620.00
IN	County of Cass	\$8,830.00
IN	County of Hendricks	\$10,313.00
IN	County of Lake	\$11,173.00
IN	Hamilton County	\$18,483.00
IN	County of Allen	\$20,678.00
IN	Marion County	\$93,326.00
IN	Indiana Department of Correction	\$693,074.00
KS	County of Butler	\$626.00
KS	County of Montgomery	\$1,626.00
KS	County of Saline	\$4,829.00
KS	County of Sedgwick	\$57,711.00
KS	Unified Government of Wyandotte County	\$78,040.00
KS	Johnson County Kansas	\$195,604.00
KS	State of Kansas	\$323,606.00
KY	NELSON COUNTY	\$1,245.00
KY	Marion County Fiscal Court	\$1,323.00
KY	Daviess County Fiscal Court	\$4,282.00
KY	SHELBY COUNTY	\$11,086.00
KY	Kentucky Department of Corrections	\$18,598.00
KY	Louisville Metro Government	\$36,523.00
KY	Lexington Fayette Urban County Government	\$65,503.00
LA	Parish of Union	\$1,350.00
LA	Lafourche Parish Sheriff's Office	\$4,467.00
LA	Bossier Parish Sheriff's Office	\$9,149.00
LA	Caddo Parish Sheriff's Office	\$10,068.00
LA	Department of Public Safety and Corrections	\$65,977.00
MA	Norfolk County	\$15,031.00
MA	Barnstable County Sheriff's Office	\$53,191.00
MA	Commonwealth of MA- Sheriffs Department Essex	\$114,336.00
MA	Hampden County	\$115,128.00
MA	Bristol County Sheriff's Office	\$118,331.00

MA	County of Plymouth	\$140,920.00
MA	Middlesex Sheriff's Office	\$331,311.00
MA	Suffolk County Sheriff's Department	\$562,944.00
MA	Massachusetts Department of Correction	\$2,634,145.00
MD	St. Marys County Government	\$609.00
MD	Garrett County Commissioners	\$1,050.00
MD	WICOMICO COUNTY DEPARTMENT OF CORRECTIONS	\$7,316.00
MD	Charles County Government	\$10,623.00
MD	County of Carroll	\$10,649.00
MD	County of Washington	\$16,848.00
MD	Frederick County	\$26,767.00
MD	County of Howard	\$44,318.00
MD	COUNTY OF ANNE ARUNDEL	\$95,273.00
MD	Baltimore County, Maryland	\$96,457.00
MD	Prince Georges County Government	\$170,299.00
MD	Montgomery County	\$678,019.00
MD	State of Maryland	\$1,220,651.00
ME	County of Lincoln	\$2,992.00
ME	County of York	\$5,487.00
ME	State of Maine	\$113,779.00
MI	County of Wexford	\$308.00
MI	County of Monroe	\$640.00
MI	Sanilac County	\$1,270.00
MI	Ingham County	\$1,448.00
MI	County of Newaygo	\$1,604.00
MI	County of Lapeer	\$1,661.00
MI	COUNTY OF GRATIOT	\$1,959.00
MI	County of St Clair	\$2,279.00
MI	County of Lenawee	\$2,401.00
MI	County of Muskegon	\$2,564.00
MI	St Joseph County	\$2,743.00
MI	County of Midland	\$2,791.00
MI	County of Branch	\$3,068.00
MI	County of Cass	\$3,072.00
MI	County of Jackson	\$4,025.00
MI	County of Ionia	\$4,257.00
MI	County of Eaton	\$4,307.00
MI	Allegan County	\$4,752.00
MI	County of Calhoun	\$5,084.00
MI	County of Saginaw	\$5,487.00
MI	County of Kalamazoo	\$6,556.00
MI	Livingston County	\$9,028.00
MI	County of Van Buren	\$9,804.00
MI	County of Genesee	\$11,029.00
MI	County of Macomb	\$15,225.00
MI	County of Berrien	\$15,460.00
MI	County of Ottawa	\$26,233.00
MI	County of Oakland	\$35,485.00
MI	WAYNE COUNTY	\$72,395.00
MI	County of Kent	\$118,937.00
MI	State of Michigan	\$924,134.00
MN	County of Chisago	\$698.00
MN	County of Yellow Medicine	\$2,900.00
MN	County of Benton	\$3,001.00
MN	County of Steele	\$3,998.00

MN	Todd County Detention Center	\$4,082.00
MN	Polk County	\$4,095.00
MN	Chippewa County	\$7,206.00
MN	County Of Blue Earth	\$8,835.00
MN	Watonwan County	\$8,949.00
MN	County of McLeod	\$9,070.00
MN	County of Freeborn	\$12,680.00
MN	County of Wright	\$13,808.00
MN	County of Winona	\$14,769.00
MN	Washington County	\$16,794.00
MN	Kandiyohi County	\$17,112.00
MN	Anoka County	\$18,990.00
MN	County of Stearns	\$21,022.00
MN	County of Goodhue	\$22,114.00
MN	County of Dakota	\$33,876.00
MN	Olmsted County	\$37,462.00
MN	County of Scott	\$56,753.00
MN	County of Ramsey	\$111,333.00
MN	Hennepin County	\$193,260.00
MN	State of Minnesota	\$711,531.00
MO	County of Pike	\$216.00
MO	County of Phelps	\$448.00
MO	County of Pettis	\$3,626.00
MO	County of Platte	\$3,943.00
MO	St. Louis County	\$8,164.00
MO	County of St Charles	\$19,888.00
MO	Jackson County	\$29,223.00
MO	Missouri Department of Corrections	\$248,226.00
MP	CNMI	\$25,771.00
MS	DeSoto County	\$7,423.00
MS	Harrison County	\$13,671.00
MS	State of Mississippi	\$15,707.00
MT	County of Yellowstone	\$3,465.00
MT	Montana Department of Corrections	\$30,959.00
NC	Stokes County	\$722.00
NC	Tyrrell County	\$764.00
NC	McDowell County	\$1,115.00
NC	COUNTY OF BLADEN	\$2,035.00
NC	Franklin County	\$2,036.00
NC	Yadkin County	\$2,041.00
NC	Cleveland County	\$2,442.00
NC	Richmond County	\$2,505.00
NC	Ashe County	\$2,770.00
NC	County of Washington	\$2,948.00
NC	Granville County	\$2,952.00
NC	Carteret County	\$3,123.00
NC	Stanly County	\$3,812.00
NC	Avery County	\$4,090.00
NC	Transylvania County	\$4,148.00
NC	Alleghany County	\$4,238.00
NC	Craven County	\$4,514.00
NC	Wilson County	\$4,587.00
NC	Wilkes County	\$4,646.00
NC	county of person	\$4,714.00
NC	Lincoln County	\$5,862.00
NC	Montgomery County	\$5,992.00

NC	Watauga County	\$6,532.00
NC	Sampson County	\$6,645.00
NC	County of Lenoir	\$6,672.00
NC	County of Columbus	\$6,996.00
NC	Nash County	\$7,828.00
NC	Burke County	\$8,787.00
NC	Beaufort County	\$9,504.00
NC	County of Robeson	\$9,558.00
NC	County of Surry	\$10,522.00
NC	Davie County	\$11,075.00
NC	County of Lee	\$11,262.00
NC	County of Dare	\$11,264.00
NC	County of Rockingham	\$11,454.00
NC	Brunswick County Government Center	\$11,507.00
NC	County of Chatham	\$12,807.00
NC	Wayne County	\$12,881.00
NC	Gaston County	\$13,886.00
NC	County of Harnett	\$14,237.00
NC	County of Duplin	\$14,965.00
NC	Rowan County	\$15,254.00
NC	Davidson County	\$16,782.00
NC	Moore County	\$18,307.00
NC	County of Catawba	\$21,452.00
NC	County of Henderson	\$21,721.00
NC	County of Jackson	\$22,060.00
NC	Iredell County	\$22,567.00
NC	Alamance County	\$28,106.00
NC	County of Randolph	\$33,387.00
NC	County of Johnston	\$38,239.00
NC	Orange County	\$40,702.00
NC	County of Cabarrus	\$44,819.00
NC	County of Pitt	\$46,115.00
NC	County of Cumberland	\$46,784.00
NC	County of Union	\$56,197.00
NC	County of Buncombe	\$63,118.00
NC	County of Guilford	\$82,907.00
NC	New Hanover, County of	\$89,560.00
NC	County of Durham	\$95,665.00
NC	Forsyth County	\$167,193.00
NC	Mecklenburg County	\$232,771.00
NC	State of North Carolina	\$3,009,157.00
ND	Grand Forks County	\$5,088.00
ND	Cass County	\$12,069.00
ND	State of North Dakota	\$17,717.00
NE	County of Phelps	\$113.00
NE	county of thurston	\$540.00
NE	COUNTY OF GAGE	\$580.00
NE	County of Buffalo	\$2,555.00
NE	Saline County	\$2,869.00
NE	Lincoln County	\$4,433.00
NE	Dawson County	\$11,532.00
NE	County of Platte	\$12,027.00
NE	Dakota County	\$16,791.00
NE	County of Sarpy	\$36,858.00
NE	Lancaster County	\$55,271.00
NE	County of Hall	\$58,054.00

NE	State of Nebraska	\$153,466.00
NE	Douglas County	\$231,125.00
NH	Strafford County	\$591.00
NH	Grafton County	\$5,123.00
NH	County of Merrimack	\$9,274.00
NH	Hillsborough County	\$24,472.00
NH	State of New Hampshire	\$93,101.00
NJ	County of Sussex	\$2,664.00
NJ	Cape May County	\$24,443.00
NJ	Hunterdon County	\$27,511.00
NJ	COUNTY OF WARREN	\$28,391.00
NJ	County of Gloucester	\$38,872.00
NJ	Cumberland County	\$110,010.00
NJ	County of Atlantic	\$112,071.00
NJ	Burlington County	\$149,429.00
NJ	SOMERSET COUNTY	\$153,104.00
NJ	Camden County	\$163,677.00
NJ	Middlesex County	\$181,741.00
NJ	Ocean County	\$213,972.00
NJ	PASSAIC COUNTY	\$298,473.00
NJ	Morris County	\$305,477.00
NJ	Union County	\$352,692.00
NJ	Bergen County	\$432,540.00
NJ	County Of Monmouth	\$513,354.00
NJ	County of Hudson	\$1,652,669.00
NJ	County of Essex	\$1,756,133.00
NJ	State of New Jersey	\$3,792,188.00
NM	Dona Ana County	\$1,417.00
NM	Quay County	\$1,600.00
NM	Sierra County	\$1,641.00
NM	Eddy County	\$1,944.00
NM	Luna County	\$1,980.00
NM	County of Chaves	\$4,189.00
NM	County of Valencia	\$4,197.00
NM	County of Rio Arriba	\$5,736.00
NM	County of Roosevelt	\$8,837.00
NM	County of Otero	\$9,759.00
NM	San Juan County Government	\$10,961.00
NM	County of Lea	\$23,934.00
NM	Bernalillo County	\$316,977.00
NM	State of New Mexico	\$446,531.00
NV	County of Pershing	\$1,196.00
NV	County of Humboldt	\$2,981.00
NV	County of Douglas	\$4,419.00
NV	Elko County	\$7,141.00
NV	County of Lyon	\$7,352.00
NV	Nye County	\$7,570.00
NV	City of Carson City	\$19,767.00
NV	City of North Las Vegas	\$78,700.00
NV	City of Las Vegas	\$119,665.00
NV	County of Washoe	\$215,004.00
NV	Clark County	\$1,436,764.00
NV	Nevada Department of Corrections	\$1,935,374.00
NY	Chautauqua County	\$117.00
NY	County of Cayuga	\$2,144.00
NY	County of Columbia	\$2,187.00

NY	County of Livingston	\$2,479.00
NY	County of Jefferson	\$2,608.00
NY	County of Chemung	\$3,399.00
NY	Wyoming, County of	\$3,663.00
NY	County of Herkimer	\$3,679.00
NY	St. Lawrence County	\$4,281.00
NY	Essex County	\$4,901.00
NY	Orleans County	\$5,982.00
NY	County of Oswego	\$6,920.00
NY	County of Warren	\$7,716.00
NY	County of Fulton	\$7,798.00
NY	County of Wayne	\$8,757.00
NY	County of Genesee	\$8,827.00
NY	County of Rensselaer	\$8,959.00
NY	County of Oneida	\$17,239.00
NY	County of Ontario	\$17,827.00
NY	County of Niagara	\$19,758.00
NY	County of Onondaga	\$21,612.00
NY	County of Broome	\$24,896.00
NY	County of Franklin	\$29,310.00
NY	County of Ulster	\$31,446.00
NY	County of Monroe	\$36,320.00
NY	County of Albany	\$37,758.00
NY	County Of Schenectady	\$43,136.00
NY	County of Erie	\$48,809.00
NY	Putnam County	\$52,759.00
NY	County of Dutchess	\$115,815.00
NY	County of Orange	\$164,205.00
NY	County of Rockland	\$421,779.00
NY	Westchester County	\$1,187,832.00
NY	Suffolk County	\$1,396,098.00
NY	Nassau County	\$6,823,524.00
NY	New York City	\$9,535,609.00
NY	State of New York	\$13,371,017.00
OH	County of Defiance	\$19.00
OH	County of Fulton	\$66.00
OH	Licking County	\$1,002.00
OH	Erie County	\$2,398.00
OH	Clark County	\$2,452.00
OH	County of Henry	\$2,468.00
OH	Union County	\$3,743.00
OH	Stark County	\$4,055.00
OH	County of Montgomery	\$7,596.00
OH	County of Clermont	\$8,237.00
OH	County of Greene	\$9,892.00
OH	County of Lucas	\$15,710.00
OH	Cuyahoga County	\$43,360.00
OH	Butler County	\$174,727.00
OH	State of Ohio	\$623,214.00
OK	COUNTY OF LINCOLN	\$331.00
OK	BRYAN, COUNTY OF	\$1,375.00
OK	county of love	\$2,040.00
OK	COUNTY OF CADDO	\$2,154.00
OK	County of Carter	\$2,808.00
OK	County of Comanche	\$2,965.00
OK	County of Beckham	\$3,163.00

OK	County of Garfield	\$4,715.00
OK	County of Cleveland	\$4,756.00
OK	COUNTY OF CUSTER	\$6,736.00
OK	Texas County	\$17,832.00
OK	Oklahoma County	\$54,893.00
OK	County of Tulsa	\$66,552.00
OK	State of Oklahoma	\$711,696.00
OR	County of Sherman	\$285.00
OR	County of Baker	\$508.00
OR	County of Union	\$683.00
OR	County of Gilliam	\$1,615.00
OR	Josephine County	\$1,941.00
OR	Klamath County	\$2,155.00
OR	Coos County	\$2,582.00
OR	County of Wasco	\$4,903.00
OR	County of Polk	\$5,359.00
OR	Lincoln County	\$6,581.00
OR	County of Jefferson	\$6,629.00
OR	County of Curry	\$7,255.00
OR	County of Douglas	\$7,617.00
OR	County of Tillamook	\$8,104.00
OR	County of Malheur	\$8,968.00
OR	County of Benton	\$9,280.00
OR	County of Clatsop	\$9,363.00
OR	County of Linn	\$9,868.00
OR	County of Hood River	\$14,184.00
OR	Yamhill County	\$18,263.00
OR	County of Umatilla	\$19,219.00
OR	County of Deschutes	\$24,510.00
OR	County of Jackson	\$37,858.00
OR	County of Clackamas	\$98,499.00
OR	Marion County	\$118,802.00
OR	Lane County Oregon	\$131,627.00
OR	Multnomah County	\$230,003.00
OR	County of Washington	\$232,340.00
OR	Oregon Department of Corrections	\$1,996,569.00
PA	County of Blair	\$500.00
PA	County of Lycoming	\$650.00
PA	County of Crawford	\$2,159.00
PA	County of Centre	\$3,012.00
PA	County of Indiana	\$6,039.00
PA	County of Westmoreland	\$9,428.00
PA	County of Lebanon	\$9,976.00
PA	COUNTY OF PIKE	\$10,207.00
PA	County of Monroe	\$10,817.00
PA	Lackawanna County	\$11,278.00
PA	County of Erie	\$13,446.00
PA	County of Allegheny	\$17,681.00
PA	County of Cumberland	\$19,571.00
PA	County of Adams	\$20,432.00
PA	County of Lancaster	\$28,770.00
PA	Northampton County	\$34,048.00
PA	County of Berks	\$39,242.00
PA	County of Dauphin	\$44,853.00
PA	County of Bucks	\$71,476.00
PA	County of Chester ,West Chester Pa	\$90,980.00

PA	City of Philadelphia	\$91,391.00
PA	County of Lehigh	\$99,886.00
PA	COUNTY OF LUZERNE	\$111,332.00
PA	Pennsylvania Department of Corrections	\$977,198.00
PR	Puerto Rico Department of Corrections and Rehabilitation	\$313,317.00
RI	State of Rhode Island	\$677,789.00
SC	Colleton County	\$487.00
SC	Greenwood County	\$1,598.00
SC	Anderson, County of	\$2,372.00
SC	County of Laurens	\$2,511.00
SC	Georgetown County	\$3,335.00
SC	County of Pickens	\$3,339.00
SC	County of Dorchester	\$5,655.00
SC	Richland County Government	\$9,975.00
SC	Aiken County	\$12,021.00
SC	County of York	\$18,125.00
SC	LEXINGTON COUNTY	\$43,688.00
SC	County Council of Beaufort	\$58,080.00
SC	County of Greenville	\$58,506.00
SC	County of Horry	\$75,510.00
SC	Charleston County	\$264,094.00
SC	SOUTH CAROLINA DEPARTMENT OF CORRECTIONS (INC)	\$388,721.00
SD	Pennington County	\$7,388.00
SD	State of South Dakota	\$33,226.00
SD	Minnehaha County	\$37,024.00
TN	Lincoln County	\$365.00
TN	Maury County Government	\$1,622.00
TN	Williamson County	\$3,100.00
TN	Dickson County	\$4,165.00
TN	County of Anderson	\$4,501.00
TN	County Of Hamblen	\$7,986.00
TN	County of Sumner	\$8,317.00
TN	Hamilton County	\$19,315.00
TN	Knox County	\$24,403.00
TN	County of Montgomery	\$33,508.00
TN	Metropolitan Nashville And Davidson County	\$155,057.00
TN	Shelby County	\$228,678.00
TN	State of Tennessee	\$230,234.00
TX	County of Fannin	\$75.00
TX	willacy county	\$483.00
TX	HOCKLEY COUNTY	\$644.00
TX	County of Live Oak	\$754.00
TX	County of Duval	\$806.00
TX	County of Orange	\$807.00
TX	County of Bee	\$858.00
TX	County of Wheeler	\$1,219.00
TX	Culberson County	\$1,311.00
TX	County of Brown	\$1,487.00
TX	County of Comanche	\$1,509.00
TX	County of Crane	\$1,596.00
TX	County of Lamar	\$1,749.00
TX	County of Leon	\$2,155.00
TX	County of Bosque	\$2,293.00
TX	County of Polk	\$2,468.00
TX	County of Coryell	\$3,018.00

TX	County of Palo Pinto	\$3,127.00
TX	COUNTY OF HUDSPETH	\$3,284.00
TX	County of Castro	\$3,365.00
TX	County of Wood	\$3,371.00
TX	Bowie County	\$3,451.00
TX	County of Upshur	\$3,557.00
TX	COUNTY OF LYNN	\$3,898.00
TX	County of Hopkins	\$3,951.00
TX	Hood County	\$4,037.00
TX	Milam County	\$4,511.00
TX	County of Brewster	\$4,700.00
TX	County of Jackson	\$4,705.00
TX	County of Parmer	\$4,887.00
TX	County of Lee	\$4,906.00
TX	Erath County Texas	\$5,211.00
TX	County of Pecos	\$5,535.00
TX	County of Randall	\$5,560.00
TX	County of Ochiltree	\$6,181.00
TX	County of Terry	\$6,293.00
TX	County of Atascosa	\$6,308.00
TX	County of Deaf Smith	\$6,403.00
TX	County of Matagorda	\$6,409.00
TX	County of Bailey	\$6,755.00
TX	County of Fayette	\$6,931.00
TX	Caldwell County	\$7,034.00
TX	Medina County	\$7,096.00
TX	County of Kerr	\$7,265.00
TX	County of Walker	\$7,413.00
TX	County of Cherokee	\$7,487.00
TX	County of Van Zandt	\$8,292.00
TX	County of Dallam	\$8,352.00
TX	Titus County	\$8,575.00
TX	County of Hemphill	\$9,031.00
TX	Freestone County	\$9,276.00
TX	County of Harrison	\$9,321.00
TX	County of Kendall	\$9,484.00
TX	Chambers County Texas	\$10,197.00
TX	Nacogdoches County	\$10,318.00
TX	County of Hill	\$11,007.00
TX	County of Limestone	\$11,341.00
TX	County of Hutchinson	\$11,538.00
TX	Kaufman County	\$11,826.00
TX	Burnet County	\$12,045.00
TX	County of Zapata	\$12,149.00
TX	County of Andrews	\$12,745.00
TX	County of Parker	\$12,791.00
TX	County of Nueces	\$12,893.00
TX	Henderson County	\$13,006.00
TX	County of Carson	\$13,031.00
TX	County of Angelina	\$13,193.00
TX	Tom Green County	\$13,280.00
TX	County Of Kleberg	\$13,452.00
TX	County of Gonzales	\$13,678.00
TX	County of Austin	\$13,710.00
TX	County of Waller	\$14,031.00
TX	County of Washington	\$14,482.00

TX	County of Starr	\$15,718.00
TX	Jefferson County	\$17,129.00
TX	Maverick County	\$18,127.00
TX	County of Taylor	\$19,086.00
TX	WISE COUNTY	\$19,837.00
TX	County Of Hunt	\$23,202.00
TX	County of Moore	\$24,071.00
TX	Liberty County, Texas	\$27,463.00
TX	County of Navarro	\$28,191.00
TX	County of Bastrop	\$31,687.00
TX	County of Rockwall	\$32,810.00
TX	County of Ellis	\$33,040.00
TX	County of Gillespie	\$33,076.00
TX	County of Ector	\$33,662.00
TX	Midland County	\$34,927.00
TX	County of Johnson	\$36,367.00
TX	County of Grayson	\$37,573.00
TX	Brazoria County	\$37,877.00
TX	Gregg, County of	\$39,515.00
TX	County of Brazos	\$40,683.00
TX	Potter County	\$41,292.00
TX	County of Hidalgo	\$43,101.00
TX	COUNTY OF LUBBOCK	\$53,430.00
TX	County of Comal	\$56,444.00
TX	Galveston County	\$63,294.00
TX	Hays County, Texas	\$64,768.00
TX	County of Smith	\$65,864.00
TX	County of McLennan	\$72,923.00
TX	County of Bell	\$74,925.00
TX	County of Collin	\$102,223.00
TX	County of Fort Bend	\$106,246.00
TX	County of Bexar	\$126,270.00
TX	County of Montgomery	\$126,619.00
TX	County of Williamson	\$136,312.00
TX	County of Webb	\$150,001.00
TX	County of Denton	\$217,394.00
TX	El Paso County	\$335,439.00
TX	County of Tarrant	\$363,277.00
TX	Travis County	\$492,999.00
TX	County of Dallas	\$976,149.00
TX	State of Texas	\$10,695,980.00
UT	Tooele County	\$6,109.00
UT	County of Cache	\$18,387.00
UT	County of Washington	\$19,006.00
UT	County of Weber	\$32,381.00
UT	Davis County	\$59,535.00
UT	Utah County Government	\$93,388.00
UT	State of Utah	\$459,480.00
UT	Salt Lake County	\$465,786.00
VA	Isle of Wight County	\$13.00
VA	City of Poquoson	\$957.00
VA	County of Pittsylvania	\$1,029.00
VA	City of Martinsville	\$1,236.00
VA	COUNTY OF KING GEORGE	\$1,394.00
VA	County of Nelson	\$2,262.00
VA	Roanoke County	\$2,477.00

VA	COUNTY OF FAUQUIER	\$3,544.00
VA	Williamsburg City	\$3,555.00
VA	City Of Danville	\$3,622.00
VA	Floyd County Board of Supervisor	\$3,705.00
VA	COUNTY OF CLARKE	\$4,706.00
VA	City of Suffolk	\$5,084.00
VA	James City County	\$5,099.00
VA	York County	\$5,228.00
VA	County of Henry	\$6,211.00
VA	Grayson County Administration	\$7,740.00
VA	Carrol County	\$11,283.00
VA	City of Fredericksburg	\$11,900.00
VA	Shenandoah County	\$13,986.00
VA	City of Charlottesville	\$15,314.00
VA	culpeper county	\$15,560.00
VA	COUNTY OF SPOTSYLVANIA	\$18,177.00
VA	City of Roanoke	\$19,174.00
VA	COUNTY OF STAFFORD	\$19,268.00
VA	CITY OF WINCHESTER	\$21,327.00
VA	COUNTY OF FREDERICK	\$24,595.00
VA	County of Albemarle	\$27,188.00
VA	City of Newport News	\$28,745.00
VA	Rockingham County	\$31,078.00
VA	Henrico County	\$34,258.00
VA	City of Norfolk	\$44,181.00
VA	City of Richmond	\$61,055.00
VA	City of Alexandria	\$65,992.00
VA	City of Virginia Beach	\$71,800.00
VA	City of Manassas	\$78,950.00
VA	Loudoun County	\$98,806.00
VA	Chesterfield County	\$162,924.00
VA	Arlington County	\$183,557.00
VA	County of Prince William	\$341,696.00
VA	County of Fairfax	\$891,858.00
VA	Commonwealth of Virginia	\$1,112,901.00
VI	Virgin Islands	\$155,369.00
VT	Vermont Department of Corrections	\$14,749.00
WA	County of Pend Oreille	\$537.00
WA	County of Whitman	\$685.00
WA	County of Skamania	\$2,596.00
WA	Grays Harbor County	\$3,007.00
WA	County of Klickitat	\$3,512.00
WA	City of Kent	\$3,731.00
WA	Clallam County	\$4,402.00
WA	Kitsap County	\$5,646.00
WA	Kittitas County	\$7,934.00
WA	Adams County	\$10,051.00
WA	Spokane County	\$11,098.00
WA	City of Yakima	\$12,059.00
WA	Lewis County	\$12,509.00
WA	Walla Walla County	\$13,725.00
WA	County of Okanogan	\$14,206.00
WA	Mason County	\$16,133.00
WA	Cowlitz County	\$19,561.00
WA	City of Wenatchee	\$19,616.00
WA	Skagit County	\$28,881.00

WA	County of Benton	\$33,573.00
WA	County of Grant	\$34,806.00
WA	Clark County	\$39,900.00
WA	County of Thurston	\$41,376.00
WA	County of Franklin	\$46,961.00
WA	Whatcom County	\$55,858.00
WA	Snohomish County	\$66,073.00
WA	County of Chelan	\$68,214.00
WA	County of Yakima	\$118,244.00
WA	County of Pierce	\$235,516.00
WA	King County	\$724,358.00
WA	State of Washington	\$1,557,951.00
WI	County of Marinette	\$19.00
WI	County of Grant	\$773.00
WI	Green County	\$1,166.00
WI	Dunn County	\$1,210.00
WI	Kewaunee County	\$2,129.00
WI	Richland County	\$2,170.00
WI	County of Wood	\$2,241.00
WI	Dodge County	\$2,610.00
WI	Calumet County	\$2,780.00
WI	Monroe County	\$3,148.00
WI	Barron County, Wisconsin	\$3,271.00
WI	County of Taylor	\$3,414.00
WI	County of Waushara	\$3,452.00
WI	County of Lafayette	\$4,433.00
WI	WASHINGTON COUNTY	\$4,550.00
WI	County of Columbia	\$5,433.00
WI	County of Door	\$5,666.00
WI	Eau Claire County	\$5,841.00
WI	Portage County	\$5,975.00
WI	Ozaukee County	\$8,201.00
WI	Trempealeau County	\$8,398.00
WI	Marathon County Government	\$8,882.00
WI	County of Sauk	\$9,519.00
WI	Shawano County	\$9,544.00
WI	Waupaca County	\$9,676.00
WI	County of Fond du Lac	\$10,314.00
WI	La Crosse County	\$11,040.00
WI	County of Manitowoc	\$15,090.00
WI	Winnebago County	\$16,160.00
WI	County of Rock	\$19,630.00
WI	County of Jefferson	\$21,840.00
WI	County of Racine	\$22,235.00
WI	County of Outagamie	\$27,637.00
WI	County of Sheboygan	\$27,787.00
WI	County of Milwaukee	\$29,127.00
WI	County of Waukesha	\$36,797.00
WI	County of Kenosha	\$36,815.00
WI	County of Walworth	\$48,223.00
WI	County of Brown	\$72,315.00
WI	County of Dane	\$104,240.00
WI	State of Wisconsin	\$1,037,621.00
WV	Berkeley County Council	\$8,664.00
WY	Laramie County	\$5,230.00
WY	State of Wyoming	\$113,259.00