

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

COOK COUNTY, ILLINOIS,

et al.,

Plaintiffs,

v.

CHAD F. WOLF, in his official capacity as
Acting Secretary of U.S. Department of
Homeland Security; U.S. DEPARTMENT OF
HOMELAND SECURITY,

et al.,

Defendants.

Case No. 19-cv-6334

Judge Gary Feinerman

Supplemental Notice

Plaintiffs Illinois Coalition for Immigrant and Refugee Rights (“ICIRR”) and Cook County respectfully submit this Notice to provide the Court with citations to sources discussed by counsel for ICIRR during the Status Hearing held on July 14, 2020. As stated at the Status Hearing, Plaintiffs have identified public information supporting Plaintiffs’ position that Ronald Vitiello, Jon Feere, Theodore Wold, Zina Bash, and David Wetmore should be included as custodians for purposes of Defendants’ collection of documents responsive to Plaintiffs’ document requests. *See* Joint Status Report, Dkt. No. 181, at 6–9. In particular, the following sources indicate that these proposed custodians not only were involved in crafting federal immigration policy during the relevant time frame, but also were advisors to Stephen Miller and had regular (in some cases, weekly) meetings with him on the topic of immigration policy. Given the timing and subject

matter of these discussions, these individuals thus are highly likely to have responsive documents disclosing or otherwise shedding light upon the true rationale for the public charge Rule.

- Eileen Sullivan and Michael D. Shear, *Trump Sees an Obstacle to Getting His Way on Immigration: His Own Officials*, N.Y. TIMES (Apr. 14, 2019), <https://www.nytimes.com/2019/04/14/us/politics/trump-immigration-stephen-miller.html> (reporting that Ronald D. Vitiello, among others, was present at a meeting in the Situation Room of the White House to discuss “[a] regulation to deny welfare benefits to legal immigrants[]”).
- *American Oversight v. U.S. Immigration and Customs Enforcement*, 1:19-cv-00774 (D.D.C. March 20, 2019), a FOIA lawsuit through which emails were obtained and reproduced at <https://www.documentcloud.org/documents/6551940-ICE-Email-Communications-With-or-About-White.html#document/p426/a539947> (disclosing emails indicating that Bash, Feere, Wetmore, and Wold were involved in regular discussions concerning immigration policy with Stephen Miller during the relevant timeframe).
- Chuck Tanner, *Krisanne Hall Confers with Trump Official on Immigration Policy*, IREHR (October 23, 2019), <https://www.irehr.org/2019/10/23/krisanne-hall-confers-with-trump-official-on-immigration-policy/> (reporting on a meeting between Krisanne Hall, a far-right political commentator who has spoken at white nationalist events, and Theodore Wold in the White House on October 9, 2019).

Dated: July 15, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on July 15, 2020, she caused the attached **Plaintiff's Supplemental Notice** to be served via the Court's ECF system, which sent a Notice of Electronic Filing to all counsel of record.

/s/ Marlow Svatek