



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

KMA; 2019V03293

*271-A Cadman Plaza East, 7th Floor
Brooklyn, New York 11201*

April 29, 2021

BY ECF

Honorable Ramon E. Reyes, Jr.
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *CLEAR, et al. v. United States Customs and Border Protection,*
Civil Action No. 19-CV-07079 (RER)

Dear Judge Reyes:

This letter is respectfully submitted on behalf of Defendant United States Customs and Border Protection (“CBP”) as directed by Your Honor at the oral argument on April 26, 2021, in the action brought pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552.

CBP respectfully requests that Your Honor review *in camera* the following documents, which the agency withheld in their entireties in responding to Plaintiffs’ FOIA request for records concerning the CBP Tactical Terrorism Response Teams:¹

- 15 – CTD 10 TTRT Orientation 20200304 (17 pages)
- 16 – Memorandum – Importance of Targeting Rules (1 page)
- 18 – Muster – Updated Guidance [redacted] (2 pages)
- 19 – Nomination Referrals (18 pages)
- 27 – TOC Watchlisting Overview (15 pages)

¹ The numbers refer to the corresponding numbers in the “Vaughn index” (Dkt. #39-3) (Exhibit M to the Declaration of Patrick Howard).

Thank you for Your Honor's consideration of this submission.

Respectfully submitted,

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