

to prioritize criminal aliens. In light of the EO, ICE cannot commit to exempt classes of aliens, such as non-criminals, from possible arrest and detention.

5. Interim FOD Adducci has been given the following documents from the above captioned matter:

- a. ECF No. 27, Amended Complaint.
- b. ECF No. 30, Petitioners' Motion for Order to Show Cause.
- c. ECF No. 34, Memorandum and Order to Show Cause.
- d. Transcript of Hearing, May 8, 2018.
- e. ECF No. 69, Sequestration Order.
- f. Transcript of Lobby Conference, May 23, 2018.
- g. ECF No. 85, Revised Sequestration Order.

Respectfully submitted,

CHAD READLER
Acting Assistant Attorney General

WILLIAM C. PEACHEY
Director
Office of Immigration Litigation

J. MAX WEINTRAUB
Senior Litigation Counsel

/s/ Mary L. Larakers
MARY L. LARAKERS (Texas Bar # 24093943)
Trial Attorney
U.S. Department of Justice, Civil Division
Office of Immigration Litigation,
District Court Section
P.O. Box 868, Ben Franklin Station
Washington, DC 20044
(202) 353-4419
(202) 305-7000 (facsimile)
mary.l.larakers@usdoj.gov
Counsel for Respondents

CERTIFICATE OF SERVICE

I, Mary L. Larakers, Trial Attorney, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: June 22, 2018

/s/ Mary L. Larakers
Mary L. Larakers
Trial Attorney

Program in 171 counties. I have been the FOD in Detroit since August 2009. Prior to becoming the FOD, I served as a Deputy FOD and an Assistant FOD.

2. Among my official duties as the Interim FOD is the responsibility for overseeing the scheduling and execution of removal orders for aliens detained in ICE custody.

3. This declaration is based on personal knowledge and information made known to me in the course of my professional duties. Specifically, in my transition to my current role, I was made aware of the ongoing litigation in this matter as well as associated habeas petitions that involve the detention of non-criminal aliens and the administration of Post Order Custody Reviews (POCRs).

4. I am aware that testimony was taken by the Court from the then Acting FOD as well as other local ERO leadership regarding operations of the Boston Field Office, so I wanted to ensure the Court was made aware of my transition to the position of Interim FOD at the Boston Field Office. I have also been made aware of the Court's concerns regarding the implementation of the relevant POCR regulations in ensuring timely reviews conducted with proper notice to the parties. In light of those concerns, I plan to include those issues among my priorities to address.

5. I also understand that statements may have been made by prior local ERO leadership, which may have been interpreted as a commitment with regard to the prioritization of enforcement resources. As Interim FOD, I intend to prioritize enforcement resources consistent with Executive Order No. 13768, *Enhancing Public Safety in the Interior of the United States*, 82 Fed. Reg. 8799 (Jan. 25, 2017), and the February 20, 2017 memorandum from former Secretary of Homeland Security John Kelly, titled *Enforcement of the Immigration Laws to Serve the National Interest*. Consistent with these policies, although ERO Boston will continue to prioritize enforcement efforts toward the apprehension and removal of criminal aliens and those who pose a danger to the community or to the national security of the United States, no classes or categories of removable

aliens are exempt from enforcement, including detention. A true and accurate copy of that memorandum is attached to this declaration as Exhibit 1.

Executed this 19th day of June 2018 in New Orleans, Louisiana.



Rebecca Adducci
Interim Field Office Director
ICE Boston Field Office