

Exhibit A

SETTLEMENT AGREEMENT—ADDENDUM

Pursuant to Paragraph 10 of the Settlement Agreement (“Settlement Agreement” or “Agreement”) in this case (ECF Nos. 122-1 & 123), the Parties hereby adopt this Addendum to clarify Paragraph 1.a.iv of the Settlement Agreement, as described below.

Other than this express change, no other change to the Settlement Agreement is intended or effectuated via this Addendum, and the Parties agree and intend that the Settlement Agreement remains in full effect.

All terms in this Addendum have the same meanings as set forth in the Settlement Agreement.

Paragraph 1.a.iv of the Settlement Agreement is hereby revised to provide as follows:

iv. The unique alpha-numeric identifier required in Paragraph 1.a.i shall be used each time the same name appears throughout the FOIA production. For each qualifying redaction, any first name, middle name, last name, and/or initial(s) will be replaced with a unique alpha-numeric identifier, according to the following rules: For first names, middle names, and first or middle initials, the identifier shall begin with the letter “A.” For last names and initials, the identifier shall begin with the letter “B.” For example, if “John” is represented by

“A1” and “Smith” is represented by “B1,” “John Smith” shall be replaced with “A1 B1” (“John” is replaced with “A1” and “Smith” is replaced with “B1”). If “David” is represented by “A2,” then “David John Smith” shall be replaced with “A2 A1 B1” (“John” is replaced with “A1,” “David” is replaced with “A2,” and “Smith” is replaced with “B1”). If the middle initial “D.” is represented by “A3,” then “John D. Smith” shall be replaced with “A1 A3 B1” (“John” is replaced with “A1,” the middle initial “D.” is replaced with “A3,” and “Smith” is replaced with “B1”). If the last initial “S.” is represented by “B2,” then “John S.” could be replaced with “A1 B2” (“John” is replaced with “A1” and the last initial “S.” is replaced with “B2”).

Partial names shall also be replaced using this method, including partial names consisting of a title coupled with a last name, or a last name standing alone. For example, if the last name “Scott” is represented by “B3,” “Agent Scott” shall be replaced with “Agent B3”; if the last name “Hernandez” is represented by “B4,” “Officer Hernandez” shall be replaced with “Officer B4”; if the last name “Walker” is represented by “B5,” then the last name “Walker” appearing alone shall be replaced with “B5.” Partial names consisting only of a first name standing alone shall also be replaced using this

method. For example, if the first name "Peter" is represented by "A4," then the first name "Peter" appearing alone would be replaced with "A4."

The Addendum shall apply retroactively to the "execution date" of the Settlement Agreement, as defined in Paragraph 12 (i.e., July 3, 2020). This Addendum shall be considered executed on the latest date which it has been signed by any of the Parties or counsel representing any Parties, but this date will not effectuate any change to the "execution date" of the Settlement Agreement (i.e., July 3, 2020).

Each person signing this Addendum represents and warrants that he or she has full authority to execute it on behalf of the party or entity on whose behalf he or she signs.

Executed this _____ day of _____, 2020.

Digitally signed by JAMES V
HOLZER
Date: 2020.10.26 11:08:14 -04'00'

James V.M.L. Holzer
Deputy Chief FOIA Officer
Department of Homeland Security
(for DHS Office for Civil Rights and Civil Liberties)

Executed this _____ day of _____, 2020.

KENNETH N CLARK

Digitally signed by KENNETH N

CLARK

Date: 2020.10.28 14:30:11 -04'00'

Kenneth Clark

Assistant Director of Management and Administration
Immigration and Customs Enforcement

Executed this _____ day of _____, 2020.

James Read

Counsel to the Inspector General
Department of Homeland Security,
Office of the Inspector General

Executed this _____ day of _____, 2020.

Rebekah Salazar

Executive Director
Privacy and Diversity Office
U.S. Customs and Border Protection

Executed this _____ day of _____, 2020.

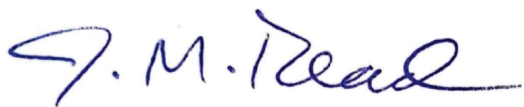
Dana Kaersvang

United States Department of Justice
Counsel for the Department of Homeland Security

Executed this _____ day of _____, 2020.

Kenneth Clark
Assistant Director of Management and Administration
Immigration and Customs Enforcement

Executed this 26th day of October, 2020.



James Read
Counsel to the Inspector General
Department of Homeland Security,
Office of the Inspector General

Executed this _____ day of _____, 2020.

Rebekah Salazar
Executive Director
Privacy and Diversity Office
U.S. Customs and Border Protection

Executed this _____ day of _____, 2020.

Dana Kaersvang
United States Department of Justice
Counsel for the Department of Homeland Security

Executed this _____ day of _____, 2020.

Kenneth Clark
Assistant Director of Management and Administration
Immigration and Customs Enforcement

Executed this _____ day of _____, 2020.

James Read
Counsel to the Inspector General
Department of Homeland Security,
Office of the Inspector General

Executed this 28 day of October, 2020.

Temea Simmons-Collins

Temea Simmons-Collins¹
(A) Executive Director
Privacy and Diversity Office
U.S. Customs and Border Protection

¹ On this copy of the addendum, the name of the Executive Director of the Privacy and Diversity Office, U.S. Customs and Border Protection has been updated to that of the current acting holder of that title. No substantive change has been made to the addendum.

Executed this _____ day of _____, 2020.

Kenneth Clark
Assistant Director of Management and Administration
Immigration and Customs Enforcement

Executed this _____ day of _____, 2020.

James Read
Counsel to the Inspector General
Department of Homeland Security,
Office of the Inspector General

Executed this _____ day of _____, 2020.

Rebekah Salazar
Executive Director
Privacy and Diversity Office
U.S. Customs and Border Protection

Executed this _____ day of _____, 2020.

DANA
KAERSVANG

Digitally signed by DANA
KAERSVANG
Date: 2020.10.23
17:46:42 -04'00'

Dana Kaersvang
United States Department of Justice
Counsel for the Department of Homeland Security

Executed this _____ day of _____, 2020.

Digitally signed by Victoria Lopez
DN: cn=Victoria Lopez, o=ACLU of Arizona, ou=Advocacy and Legal Director,
email=vlopez@acluaz.org, c=US
Date: 2020.10.27 10:37:32 -07'00'

Victoria Lopez
Advocacy and Legal Director
American Civil Liberties Union of Arizona

Executed this 27 day of October, 2020.



Jeffrey Wergeles
Deputy Director
American Civil Liberties Union of San Diego and Imperial Counties

Executed this _____ day of _____, 2020.

Digitally signed by Mitra Ebadolahi
Date: 2020.10.25 20:31:46 -07'00'

Mitra Ebadolahi
American Civil Liberties Union Foundation of San Diego and Imperial Counties
Counsel for Plaintiffs