



July 28, 2025

Filed via email

HQ USNORTHCOM/CS
Attn: FOIA Requester Service Center
250 Vandenberg Street Suite B016
Peterson Air Force Base, CO 80914-3804

NGB FOIA Office (NGB-IP)
111 South George Mason Drive, AH2
Arlington, VA 22204-1373
Email: ngb.foia@army.mil

Drug Enforcement Administration
Freedom of Information and Privacy Unit
Attn: Intake Sub-Unit
8701 Morrisette Drive
Springfield, VA 22152

U.S. Customs and Border Protection
Freedom of Information Act Office
1300 Pennsylvania Avenue NW
Washington, D.C 20229-1181
Mail Stop 1161

Defense Freedom of Information Division
1155 Defense Pentagon
OSD/ JS FOIA Re-quester Service Center
Office of Freedom of Information
1155 Defense Pentagon
Washington, DC 20301-1155

U.S. Immigration & Customs Enforcement
Freedom of Information Act Office
500 12th Street, SW, Stop 5009
Washington, D.C. 20536-5009

Re: Freedom of Information Act Request Related to DEA and DHS Enforcement Action In California

Dear FOIA Officers,

This letter constitutes a request (“Request”) pursuant to the Freedom of Information Act, 5 U.S.C. §552. This request is submitted on behalf of The National Immigration Law Center (“NILC”), regarding the recent multi-agency operation led by the Drug Enforcement Agency (“DEA”) targeting marijuana farms in the Coachella Valley, California, and the immigration enforcement operations led by the Department of Homeland Security (“DHS”) in Camarillo, California, and Carpinteria, California. All three operations involved members or units of the California National Guard operating in a Title 10 status.

I. Background



The week of June 15, 2025, the DEA led a multi-agency operation to target marijuana farms in the Coachella Valley, California.¹ Over 500 agents, officers, policemen, and soldiers from different federal agencies, including U.S. Customs and Border Protection (“CBP”), more than 300 members of the California National Guard operating under Title 10,² U.S. Immigration & Customs Enforcement (“ICE”), and the Federal Bureau of Investigation (“FBI”), among others participated in the operation.³ While reporting indicates that the federalized National Guard were involved in the raid, the public only has limited information about the National Guard’s role in the raid.

On July 10, 2025, DHS executed a warrant at marijuana facilities owned by Glass House Farms in Camarillo and Carpinteria in Southern California, involving members of the California National Guard in Title 10 status and ICE.⁴ The federalized National Guard appears to have assisted federal immigration agents in their raids on Glass House Farms in Camarillo and Carpinteria,⁵ by holding a perimeter with ballistic shields.⁶ While the reporting indicates that the federalized National Guard were involved in the raid, the public only has limited information about the National Guard’s role in these events.

¹ NBC PALM SPRINGS, *Federal Drug Busts Shakes Thermal Community: DEA Targets Illegal Marijuana Grows on Tribal Land* <https://www.nbcpalmsprings.com/2025/06/29/federal-drug-bust-shakes-thermal-community-dea-targets-illegal-marijuana-grows-on-tribal-land> (last visited July 9, 2025).

² William Jackson & Kalé Carey, *National Guard, DEA Raid Illegal Marijuana Farms in Southern California*, SAN (June 24, 2025, 1:40 PM), <https://san.com/cc/national-guard-dea-raid-illegal-marijuana-farms-in-southern-california/>.

³ Matthew Rodriguez, *500 Federal Agents and Soldiers Raid Marijuana Farms in Rural Southern California*, CBS (June 18, 2025, 9:14 PM) <https://www.cbsnews.com/losangeles/news/500-federal-agents-and-soldiers-raid-marijuana-farms-in-rural-southern-california/>.

⁴ Livia Albeck-Ripka, *Federal Agents Clash With Protesters During Immigration Raid at California Farm*, N. Y. TIMES (July 11, 2025), <https://www.nytimes.com/2025/07/11/us/ice-raid-california-cannabis-farm.html>; KTLA 5, *Dozens Detained During Federal Immigration Raid in Ventura County*, YOUTUBE (July 11, 2025), <https://www.youtube.com/watch?v=IJHmd8yE>.

⁵ Josh DuBose, *Undocumented Minors Found During Raid of Ventura County Cannabis Farm, DHS Says*, KTLA 5, <https://ktla.com/news/local-news/undocumented-minors-found-amid-raid-of-ventura-county-cannabis-farm-dhs-says/> (July 10, 2025, 11:12 PM).

⁶ KCAL News, *Federal Agents and Protesters Clash During Operation in Ventura County*, YOUTUBE (July 10 2025), <https://www.youtube.com/watch?v=1ItkEKw8zy8>.

II. Definitions:

- a. Records:** For the purposes of this request, “record(s)” include, but is not limited to, records preserved in electronic or written form, which were prepared, created, received, transmitted, collected, or maintained by DHS, ICE, CBP, the DEA, the Joint Staff, the California National Guard while operating in Title 10 status, NORTHCOM, and the National Guard Bureau, related to or referring to counter-narcotics and immigration enforcement actions in California supported by the federalized California National Guard.
- b. Communication(s):** For the purposes of this request, “communication(s)” means the transmittal of information via, but not limited to, phone, meeting minutes or notes, emails, mail, Microsoft Teams or similar messages, audio recordings, and any other method of communication, including strategic communication.
- c. Interagency coordination:** For the purposes of this request, “interagency coordination” refers to the coordination that occurs between the Department of Defense and its elements, and other U.S. government agencies and departments for the purposes of achieving an objective.
- d. Joint operation(s):** For the purposes of this request, “joint operation(s)” refers to military actions, including civil support operations, conducted by joint forces and those services forces employed in specified command relationship.
- e. Operation(s):** For the purposes of this request, “operation(s)” refers to a series of tactical actions with a common purpose or unifying theme, and a military action or the carrying out of a strategic, operational, tactical, service, training, or administrative military mission.
- f. Analysis:** For the purposes of this request, “analysis” refers to the conversion of processed information into intelligence in support of known or anticipated user requirements.
- g. Operation Order(s):** For the purposes of this request, “operation order(s)” is defined in the manner it is defined in Joint Publication 1-02.
- h. Warning order(s):** For the purposes of this request, “warning order(s)” is defined in the manner it is defined in Joint Publication 1-02.
- i. Fragmentary order(s):** For the purposes of this request, “fragmentary order(s)” is defined in the manner it is defined in Joint Publication 1-02.
- j. Objective(s):** For the purposes of this request, “objective(s)” is defined in the manner it is defined in Joint Publication 1-02.
- k. Situation Report(s):** For the purposes of this request “situation report(s)” is defined in the manner it is defined in Joint Publication 1-02.
- l. Mission(s):** For the purposes of this request, “mission(s)” is defined in the manner it is defined in Joint Publication 1-02.

- m. Rules of Engagement:** For the purposes of this request, “rules of engagement” is defined in the manner it is defined in Joint Publication 1-02.
- n. Rules for the Use of Force:** For the purposes of this request, “rules for the use of force” is defined in the manner it is defined in Joint Publication 1-02.
- o. Course of Action:** For the purposes of this request, “course of action” is defined in the manner it is defined in Joint Publication 1-02.
- p. Crisis Action Planning:** For the purposes of this request, “crisis action planning” is defined in the manner it is defined in Joint Publication 1-02.
- q. Incident Awareness and Assessment:** For the purposes of this request, “incident awareness and assessment” is defined in the manner it is defined in Joint Publication 1-02.

III. Records Requested

The Requestor seeks the following from NORTHCOM, the Department of Defense’s Office of the Assistant Secretary of Defense for Homeland Defense and Hemispheric Affairs (“ASD-HDHA”), the Joint Staff, the National Guard Bureau, and DEA from June 1, 2025, to the present related to or referring to federalized National Guard support to federal law enforcement actions in California:

- All and any NORTHCOM and DOD orders directing members or units of the California National Guard in a Title 10 status to accompany or protect federal law enforcement officials during immigration or counter-narcotics enforcement, including but not limited to operations orders (“OPORDs”), warning orders (“WARNOs”), fragmentary orders (FRAGOs), special orders, service support orders, or movement orders.
- All and any NORTHCOM and DEA orders directing members or units of the California National Guard in a Title 10 status to accompany or protect federal law enforcement officials during immigration or counter-narcotics enforcement, including but not limited to operations orders (“OPORDs”), warning orders (“WARNOs”), fragmentary orders (FRAGOs), special orders, service support orders, or movement orders.
- Any records identifying a concept of operations, tactics, plan, or objectives pertaining to members or units of the California National Guard in a Title 10 status accompanying or protecting federal law enforcement officials during immigration or counter-narcotics enforcement, including in particular in: Riverside County the week of June 15, 2025; Camarillo, California on or about July 10 and 11, 2025; Carpinteria on or about July 10 and 11, 2025; or any other locations in California between June 1, 2025, and July 15, 2025.

- Any situation reports or after action reports or similar documents generated by members or a unit of the California National Guard in a Title 10 status, Task Force 51, or Northern Command pertaining to a completed mission or operation in which members or a unit of the California National Guard in a Title 10 status accompanied or protected federal law enforcement officials during immigration or counter-narcotics enforcement.
- Any specified rules for the use of force issued to members or units of the California National Guard in a Title 10 status between June 1, 2025, and July 15, 2025.
- Any rules-of-engagement cards or rules-for-the-use-of-force cards issued to members or units of the California National Guard in a Title 10 status between June 1, 2025, and July 15, 2025.
- Any records containing policies, practices, procedures, rules, standards, protocols, analyses, agreements, or training materials detailing, explaining, identifying, outlining, or related to the coordination between the DEA and the California National Guard in a Title 10 status between June 1, 2025, and July 15, 2025.
- Any records, reports, communications, documents, correspondences, memoranda, directives, guidelines, emails, Teams messages, policies, practices, procedures, rules, standards, protocols, analyses, agreements, training materials detailing, explaining, identifying, outlining, or related to the operational objections of the DEA's operation, including and involving the California National Guard in a Title 10 status, between June 1, 2025, and July 15, 2025.
- Any records containing policies, practices, procedures, rules, standards, protocols, analyses, agreements, or training materials detailing, explaining, identifying, outlining, or related to support requests from the DEA to the California National Guard in a Title 10 status, between June 1, 2025, and July 15, 2025.
- Any records, documents, reports, instructions, orders, after action reports, or similar documents about the use of tear gas or any other riot control agents, or other-than-lethal weapons or munitions, by the California National Guard operating in Title 10 status, between June 1, 2025, and July 15, 2025.

The Requestor seeks the following from NORTHCOM, ASD-HDHA, the Joint Staff, the National Guard Bureau, CBP, and ICE from June 1, 2025, to the present related to or referring to federalized National Guard support for federal law enforcement activities in Thermal and the Coachella Valley, California on or around June 15, 2025, and in Camarillo and Carpinteria, California, on or around July 10 and 11, 2025:

- Any records containing policies, practices, procedures, rules, standards, protocols, analyses, agreements, or training materials detailing, explaining, identifying, outlining, or

related to the coordination between ICE and CBP, and the federalized California National Guard between June 1, 2025, and July 15, 2025.

- Any records containing policies, practices, procedures, rules, standards, protocols, analyses, agreements, or training materials detailing, explaining, identifying, outlining, or related to the operational objections of the DHS's operation, including and involving the California National Guard, between June 1, 2025, and July 15, 2025.
- All and any NORTHCOM and ICE and CBP orders directing members or units of the California National Guard in a Title 10 status to accompany or protecting federal law enforcement officials during immigration or counter-narcotics enforcement, including but not limited to operations orders ("OPORDs"), warning orders ("WARNOs), fragmentary orders (FRAGOs), special orders, service support orders, or movement orders.
- Any records identifying a concept of operations, plan, or objectives pertaining to members or units of the California National Guard in a Title 10 status accompanying or protecting federal law enforcement officials during immigration or counter-narcotics enforcement, issued by ICE, or CBP, including in: Riverside County the week of June 15, 2025; Camarillo, California on or about July 10 and 11, 2025; Carpinteria on or about July 10 and 11, 2025; or any other locations in California between June 6, 2025, and July 15, 2025.
- Any records containing policies, practices, procedures, rules, standards, protocols, analyses, agreements, or training materials detailing, explaining, identifying, outlining, or related to support requests from CBP and ICE, to the California National Guard in a Title 10 status, between June 1, 2025, and July 15, 2025.
- Any situation reports or after action reports or similar documents generated by members or a unit of the California National Guard in a Title 10 status, Task Force 51, or Northern Command pertaining to a completed mission or operation in which members or a unit of the California National Guard in a Title 10 status accompanied or protected federal law enforcement officials during immigration or counter-narcotics enforcement.
- Any records, documents, reports, instructions, orders, after action reports, or similar documents about the use of tear gas or any other riot control agents, or other-than-lethal weapons or munitions, by the California National Guard operating in Title 10 status, between June 1, 2025, and July 15, 2025.

The Requestor seeks the following records from NORTHCOM, ASD-HDHA, the Joint Staff, the National Guard Bureau, the DEA, CBP, and ICE from June 1, 2025, to the present, related to or referring to immigration and counter-narcotics enforcement actions in California:



- All records containing policies, practices, procedures, rules, standards, protocols, analyses, agreements, or training materials related to the action undertaken the week of June 15, 2025 in Thermal, California, or events on July 10 and 11, 2025, in Camarillo and Carpinteria, California, from June 1, 2025, to present, including, but not limited to, internal communications, as well as communications with any component agencies, interagency communications (including interagency coordination or communications with any other law enforcement agencies, including state and local agencies).
- Any records containing policies, practices, procedures, rules, standards, protocols, analyses, agreements, or training materials detailing, explaining, identifying, outlining, or related to federalized California National Guard training and crisis action planning for any counter-narcotics enforcement or immigration-enforcement related actions from June 1, 2025, to July 15, 2025.
- Any records containing policies, practices, procedures, rules, standards, protocols, analyses, agreements, or training materials detailing, explaining, identifying, outlining, or related to mission analysis, course of action development, analysis, approval, scope, and plan for any counter-narcotics enforcement or immigration-enforcement related actions assisted by the California National Guard in a Title 10 status from June 1, 2025, to July 15, 2025.
- Any records containing policies, practices, procedures, rules, standards, protocols, analyses, agreements, or training materials detailing, explaining, identifying, outlining, support, or related to the operational design, including control and coordination measures, incident awareness and assessment, and information on organizing for joint operations, of the federalized California National Guard involvement in any counter-narcotics enforcement or immigration-enforcement related actions from June 1, 2025, to July 15, 2025.
- Any records, documents, reports, instructions, orders, after action reports, or similar documents about the use of tear gas or any other riot control agents, or other-than-lethal weapons or munitions, by the California National Guard operating in Title 10 status, between June 1, 2025, and July 15, 2025.
- All communications, including phone and meeting minutes, emails, mail, Teams messages, and any other method of communication from June 1, 2025 to present, sent to or received by DEA, ICE, CBP, the National Guard Bureau, the DOD, and NORTHCOM and their employees in relation to the DEA counter-narcotics raid in Thermal California that include the following terms: “National Guard,” “Immigration Enforcement,” “perimeter,” “federalized national guard,” “Title 10,” “Federalized National Guard,” “Task Force 51,” “Northern Command,” “California National Guard,” “completed mission,” “rules of engagement,” “rules for the use of force,” “Coachella Valley,”

“Thermal,” “operation orders,” “warning orders,” “fragmentary orders,” “Glass House Farms,” “Camarillo,” “Carpinteria,” “protesters,” “demonstration,” “arrest,” or “perimeter area.”

IV. Fee Waiver Request

NILC requests a waiver of all costs pursuant to the public interest/ benefit fee waiver established by 5 U.S.C. §552(a)(4)(A)(iii) (“Documents shall be furnished without any charge . . . if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester.”). The public interest/ benefit fee waiver provisions of the FOIA are to be “liberally construed.” *See Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1300, 1312 (D.C. Cir. 2003) (“Congress amended FOIA to ensure that it be ‘liberally construed in favor of fee waivers for noncommercial requesters.’”)(citation omitted).

NILC is routinely granted fee waivers by government agencies. NILC is a nonprofit national legal advocacy organization that engages in policy analysis, advocacy, education, and litigation to promote and advance the rights of low-income immigrants and their families. NILC serves as an important resource to a broad range of immigrant advocacy groups, community organizations, legal service organizations, and the general public. As a part of its work, NILC disseminates information to the public through electronic newsletters, news alerts, issue briefs, trainings, and other educational and informational materials. In addition, NILC disseminates information to individuals, tax exempt organizations, not-for-profit groups, and members through its website (<http://www.nilc.org>). On average, NILC’s website receives nearly 7,703 visits per day, our email listserv has about 230,000 subscribers, and many visitors to our website actively download our reports, brochures, and fact sheets.

The records requested are not sought for commercial use, and NILC plans to disseminate the disclosed information to the public at no cost. *See* 6 C.F.R. §5.11(k). Disclosure of the requested records is likely to contribute significantly to public understanding of the involvement of the National Guard while in Title 10 status counter-narcotics and immigration enforcement actions in California during June and July 2025. The requested information is of great interest to the public at large, but it is not available in the public domain.

In the alternative, we request a limitation of processing fees pursuant to 5 U.S.C. § 552(a)(4)(ii)(II). (“[f]ees shall be limited to reasonable standard charges for document duplication when records are not sought for commercial use and the request is made by . . . a representative of the news media.”). *See also* 6 C.F.R. § 5.11(d). If the fee waiver request is

denied, while reserving our right to appeal the denial, NILC agrees to pay fees up to \$50. If fees are estimated to exceed this limit, please inform us to obtain consent to incur additional fees.

If the Request is denied in whole or in part, NILC asks that you justify all deletions by reference to specific FOIA exemptions. NILC expects the release of segregable portions of otherwise exempt material. NILC reserves the right to appeal a decision to withhold any information or to deny any waiver of fees.

V. Expedited Processing

NILC requests expedited processing pursuant to 5 U.S.C. § 552(a)(6)(E). There is a “compelling need” for these records, as defined in the statute, because the information requested is “urgent[ly]” needed by an organization primarily engaged in disseminating information “to inform the public concerning actual or alleged Federal Government activity.” 5 U.S.C. § 552(a)(6)(E)(v)(II). NILC is “primarily engaged in disseminating information” within the meaning of the FOIA. 5 U.S.C. § 552(a)(6)(E)(v)(II). *See also* 6 C.F.R. § 5.5(e)(1)(ii). Obtaining information about government activity, analyzing that information, and widely publishing and disseminating that information to the press and public are critical and substantial components of NILC’s work and are among its primary activities. *See ACLU v. U.S. Dep’t of Justice*, 321 F. Supp. 2d 24, 29 n.5 (D.D.C. 2004) (finding non-profit public interest group that “gathers information of potential interest to a segment of the public, uses its editorial skills to turn the raw material into a distinct work, and distributes that work to an audience” to be “primarily engaged in disseminating information”). Organizations with similar missions that engage in information dissemination activities similar to NILC are “primarily engaged in disseminating information.” *See, e.g., Leadership Conf. on Civ. Rts. v. Gonzales*, 404 F. Supp. 2d 246, 260 (D.D.C. 2005); *ACLU*, 321 F. Supp. 2d at 29 n.5; *Elec. Privacy Info. Ctr. v. U.S. Dep’t of Defense*, 241 F. Supp. 2d 5, 11 (D.D.C. 2003). The activities of and roles performed by the California National Guard while in a Title 10 status during June and July 2025—especially those of its related to civilian immigration enforcement and counter-narcotics—activities are the source of considerable public discussion and debate. Accordingly, transparency regarding its activities in support of such efforts—e.g., what actions it took, how it performed those actions, what it accomplished by those actions—is vital to the public interest.

NILC does its work on its own and in collaboration with partners and allies. NILC regularly creates and disseminates works in the form of presentations, reports, articles, interviews, testimony, social media, and blog posts to educate the public about the activities of the United States government as they relate to low-income immigrants and their families. NILC also regularly publishes practice advisories, “Know Your Rights” materials, fact sheets, and

educational brochures and pamphlets designed to educate stakeholders and the general public about issues impacting low-income immigrants. The records that are the subject of this request are urgently needed to inform the public about actual or alleged government activity. See 5 U.S.C. § 552(a)(6)(E)(v)(II).

Please furnish the applicable records to Benjamin R. Farley (farley@nilc.org). Please provide the documents in digital form whenever possible.

Thank you for your prompt attention to this matter.

Benjamin R. Farley
Special Counsel
National Immigration Law Center