Good Morning,

Please see below from [b](b) If you could, please forward to the appropriate POC's in your respective units, and send comments directly to Ken **NLT 12pm Friday, April 24**. Thank you!

Best,

[b][b]

Desk: 202-732-3300

[b][b]
Subject: FW: Commonality Study White Paper ----Standardize Biometric Testing Solution

Good morning. Can we please task this out to IG and Privacy for a review. Request by noon, this Friday. Comments just need to come to me. Thanks much.

Chief Data Officer/Assistant Director
U.S. Immigration and Customs Enforcement
(202) 732-5555 (Office)
(202) 440-2111 (Cell)

From: ICE Governance
Sent: Tuesday, April 21, 2020 8:25 AM

To: ICE Biometrics Working Group Members,

The Joint Requirements Council is looking at Biometrics and has sent the attached document out to be shared with our Biometric subject matter experts. If you have any comments please respond reply to this email with Cc's to:

If you have any questions please contact me.

Thank you,

ICE Biometrics Working Group Members,
“When you have too many top priorities, you effectively have no top priorities. Regarding strategic goals, it’s important that they are few, prioritized, and measurable.” — Stephen R. Covey

Warning: This email and any attachments are UNCLASSIFIED//FOR OFFICIAL USE ONLY (U//FOUO). It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 552). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information and is not to be released to the public or other personnel who do not have a valid "need-to-know" without prior approval of an authorized DHS official. No portion of this email should be furnished to the media, either in written or verbal form. If you are not an intended recipient or believe you have received this communication in error, please do not print, copy, retransmit, disseminate, or otherwise use this information. Please inform the sender that you received this message in error and delete the message from your system.
DHS Joint Requirements Council (JRC) Commonality Study Working Group White Paper
Leverage Biometric Technology Evaluations and Industry Challenges to Standardize Biometric Technology Solutions
Leverage Biometric Technology Evaluations and Industry Challenges to Standardize Biometric Technology Solutions.

From: (b)(6); (b)(7)(C)
Sent: Wed, 20 May 2020 19:12:53 +0000
To: (b)(6); (b)(7)(C)
Cc: 
Subject: FW: Compliance update

Only (b)(6); (b)(7)(C) has sent me anything for tomorrow’s call.

From: jice.dhs.gov>
Sent: Wednesday, May 20, 2020 1:42 PM
To: (b)(6); (b)(7)(C)@ice.dhs.gov>
Subject: RE: Compliance update

Here are some updates pertinent to your discussion with (b)(7)(C). Some compliance work I’m doing that won’t be going to (b)(5) for at least another month:

Best, (b)(6); (b)(7)(C)

Mobile: 202-870-

From: jice.dhs.gov>
Sent: Wednesday, May 20, 2020 10:37 AM
Good morning everyone –

Can you please advise on any updates, concerns or status information you have on your compliance work. We need the information for our call with Sean (DHS PRIV) tomorrow AM. If you can email it before the end of the day, it would be greatly appreciated. Thanks.
For your awareness.

Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-4
Mobile: 202-70
Main: 202-732-3300

Hope this information is helpful.

Best,
Fyi and awareness

Sent with BlackBerry Work
(www.blackberry.com)

Good Afternoon ICE Privacy,

Earlier today, all DHS components were added to DHS SEN 2020-02-6274307 - Potential Privacy Spill.

Thank you!

Very respectfully,
PRIVACY THRESHOLD ANALYSIS (PTA)

This form is used to determine whether a Privacy Impact Assessment is required.

Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 and the Homeland Security Act of 2002.

Please complete this form and send it to your component Privacy Office. If you do not have a component Privacy Office, please send the PTA to the DHS Privacy Office:

Senior Director, Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 202-343-1(b)(6)

Upon receipt from your component Privacy Office, the DHS Privacy Office will review this form. If a PIA is required, the DHS Privacy Office will send you a copy of the Official Privacy Impact Assessment Guide and accompanying Template to complete and return.

A copy of the Guide and Template is available on the DHS Privacy Office website, www.dhs.gov/privacy, on DHSConnect and directly from the DHS Privacy Office via email: q.dhs.gov, phone: 202-342(b)(7)(C)
# PRIVACY THRESHOLD ANALYSIS (PTA)

## SUMMARY INFORMATION

<table>
<thead>
<tr>
<th>Project or Program Name:</th>
<th>Repository for Analytics in a Virtualized Environment (RAVEN)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Component:</td>
<td>Immigration and Customs Enforcement (ICE)</td>
</tr>
<tr>
<td>Office or Program:</td>
<td>Homeland Security Investigations (HSI)</td>
</tr>
<tr>
<td>Xacta FISMA Name (if applicable):</td>
<td>RAVEn</td>
</tr>
<tr>
<td>Xacta FISMA Name (if applicable):</td>
<td>RAVEn</td>
</tr>
<tr>
<td>Type of Project or Program:</td>
<td>IT System</td>
</tr>
<tr>
<td>Project or program status:</td>
<td>Development</td>
</tr>
<tr>
<td>Date first developed:</td>
<td>October 1, 2017</td>
</tr>
<tr>
<td>Pilot launch date:</td>
<td>Click here to enter a date.</td>
</tr>
<tr>
<td>Date of last PTA update</td>
<td>May 1, 2018</td>
</tr>
<tr>
<td>Pilot end date:</td>
<td>N/A</td>
</tr>
<tr>
<td>ATO Status (if applicable):</td>
<td>In progress</td>
</tr>
<tr>
<td>ATO expiration date (if applicable):</td>
<td>Click here to enter a date.</td>
</tr>
</tbody>
</table>

## PROJECT OR PROGRAM MANAGER

<table>
<thead>
<tr>
<th>Name:</th>
<th>(b)(6); (b)(7)(C)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Office:</td>
<td>Operational Technology and Cyber Division</td>
</tr>
<tr>
<td>Phone:</td>
<td>646-2... (b)(6); (b)(7)(C)</td>
</tr>
<tr>
<td>Email:</td>
<td>ice.dhs.gov</td>
</tr>
</tbody>
</table>

## INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

<table>
<thead>
<tr>
<th>Name:</th>
<th>(b)(6); (b)(7)(C)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phone:</td>
<td>(202) 732... (b)(6)</td>
</tr>
<tr>
<td>Email:</td>
<td>associates.ic e.dhs.gov</td>
</tr>
</tbody>
</table>
### SPECIFIC PTA QUESTIONS

1. **Reason for submitting the PTA: Renewal PTA**

   - *(b)(5); (b)(7)(E)*
2. Does this system employ any of the following technologies:

<table>
<thead>
<tr>
<th>Technology</th>
<th>Yes/No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Closed Circuit Television (CCTV)</td>
<td>No</td>
</tr>
<tr>
<td>Social Media</td>
<td>No</td>
</tr>
<tr>
<td>Web portal (e.g., SharePoint)</td>
<td>No</td>
</tr>
<tr>
<td>Contact Lists</td>
<td>No</td>
</tr>
<tr>
<td>None of these</td>
<td>Yes</td>
</tr>
</tbody>
</table>

If you are using any of these technologies and want coverage under the respective PIA for that technology please stop here and contact the DHS Privacy Office for further guidance.

3. From whom does the Project or Program collect, maintain, use, or disseminate information?

<table>
<thead>
<tr>
<th>Source</th>
<th>Yes/No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Members of the public</td>
<td>Yes</td>
</tr>
<tr>
<td>DHS employees/contractors (list components): ICE, CBP</td>
<td>Yes</td>
</tr>
<tr>
<td>Contractors working on behalf of DHS</td>
<td>Yes</td>
</tr>
<tr>
<td>Employees of other federal agencies</td>
<td>No</td>
</tr>
</tbody>
</table>

4. What specific information about individuals is collected, generated or retained?

<table>
<thead>
<tr>
<th>Information</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Informational and collaboration-based portals in operation at OHS and its components that collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are “members” of the portal or “potential members” who seek to gain access to the portal.</td>
<td></td>
</tr>
</tbody>
</table>

---

1 Informational and collaboration-based portals in operation at DHS and its components that collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are “members” of the portal or “potential members” who seek to gain access to the portal.

2 DHS defines personal information as “Personally Identifiable Information” or PII, which is any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department. “Sensitive PII” is PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SPII and PII are treated the same.
<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>4(a) Does the project, program, or system retrieve information by personal identifier?</td>
<td>Yes. If yes, please list all personal identifiers used: ICE users can search the information within RAVEn by any element of PII. The most typical searches would center around subject name, DOB, SSN, address, phone number, email address, and/or IP address.</td>
<td>No. Please continue to next question.</td>
</tr>
<tr>
<td>4(b) Does the project, program, or system use Social Security Numbers (SSN)?</td>
<td>Yes. ICE is the primary investigative arm of the Department of Homeland Security (DHS) supporting immigration and customs law enforcement and intelligence missions. ICE has been authorized to collect information under 5 U.S.C. §301; 8 U.S.C. § 1103 and 1105; 8 U.S.C. §1225(d)(3); 8 U.S.C. §1324(b)(3); 8 U.S.C. §1357(a); 8 U.S.C. §1360(b); 19 U.S.C. § 1; and 19 U.S.C. § 1509.</td>
<td>No. Please continue to next question.</td>
</tr>
<tr>
<td>4(c) If yes, please provide the specific legal basis and purpose for the collection of SSNs:</td>
<td>The SSNs are collected and tracked to support law enforcement activities, provide identity verification, and for investigations of violations of U.S. laws, administration of immigration laws and other laws administered or enforced by DHS, and production of DHS law enforcement intelligence products.</td>
<td></td>
</tr>
<tr>
<td>4(d) If yes, please describe the uses of the SSNs within the project, program, or system:</td>
<td>Yes. If a log kept of communication traffic, please answer the following question.</td>
<td></td>
</tr>
<tr>
<td>4(e) If this project, program, or system is an information technology/system, does it relate solely to infrastructure?</td>
<td>Yes. For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</td>
<td>No. Please continue to next question.</td>
</tr>
<tr>
<td>4(f) If header or payload data is stored in the communication traffic log, please detail the data elements stored.</td>
<td></td>
<td>N/A</td>
</tr>
</tbody>
</table>

---

3 When data is sent over the Internet, each unit transmitted includes both header information and the actual data being sent. The header identifies the source and destination of the packet, while the actual data is referred to as the payload. Because header information, or overhead data, is only used in the transmission process, it is stripped from the packet when it reaches its destination. Therefore, the payload is the only data received by the destination system.
5. Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems?

☐ No.
☒ Yes. If yes, please list:
   • (b)(5); (b)(7)(E)
   •
   •
   •
   •
   •
   •
   •

6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?

☐ No.
☒ Yes. If yes, please list:

---

\[\text{PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes. Often, these systems are listed as "interconnected systems" in Xacta.}\]
<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?</td>
<td>N/A</td>
</tr>
<tr>
<td>Please describe applicable information sharing governance in place:</td>
<td></td>
</tr>
<tr>
<td>7. Does the project, program, or system provide role-based training for personnel who have access in addition to annual privacy training required of all DHS personnel?</td>
<td>No.</td>
</tr>
<tr>
<td>HSI is working to establish role-based training for personnel who have access to RAVEn.</td>
<td></td>
</tr>
<tr>
<td>8. Per NIST SP 800-53 Rev. 4, Appendix J, does the project, program, or system maintain an accounting of disclosures of PII to individuals who have requested access to their PII?</td>
<td>No.</td>
</tr>
<tr>
<td>What steps will be taken to develop and maintain the accounting: Any disclosures of PII contained in RAVEn will be made from the source system.</td>
<td></td>
</tr>
<tr>
<td>Yes. In what format is the accounting maintained:</td>
<td></td>
</tr>
<tr>
<td>9. Is there a FIPS 199 determination?</td>
<td>Unknown</td>
</tr>
<tr>
<td>No.</td>
<td></td>
</tr>
<tr>
<td>Yes. Please indicate the determinations for each of the following:</td>
<td></td>
</tr>
<tr>
<td>Confidentiality:</td>
<td></td>
</tr>
<tr>
<td>Low</td>
<td>Moderate</td>
</tr>
<tr>
<td>Integrity:</td>
<td></td>
</tr>
<tr>
<td>Low</td>
<td>Moderate</td>
</tr>
<tr>
<td>Availability:</td>
<td></td>
</tr>
</tbody>
</table>

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4 FIPS 199 is the Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems.
### PRIVACY THRESHOLD REVIEW

**(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)**

<table>
<thead>
<tr>
<th>Component Privacy Office Reviewer:</th>
<th>(b)(6); (b)(7)(C)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date submitted to Component Privacy Office:</td>
<td>May 3, 2019</td>
</tr>
<tr>
<td>Date submitted to DHS Privacy Office:</td>
<td>June 6, 2019</td>
</tr>
<tr>
<td>Component Privacy Office Recommendation:</td>
<td>Please include recommendation below, including what new privacy compliance documentation is needed</td>
</tr>
<tr>
<td>[ ] Low</td>
<td>[ ] Moderate</td>
</tr>
</tbody>
</table>

### (TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

<table>
<thead>
<tr>
<th>DHS Privacy Office Reviewer:</th>
<th>(b)(6); (b)(7)(C)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PCTS Workflow Number:</td>
<td>1181781</td>
</tr>
<tr>
<td>Date approved by DHS Privacy Office:</td>
<td>July 1, 2019</td>
</tr>
<tr>
<td>PTA Expiration Date</td>
<td>July 1, 2020</td>
</tr>
</tbody>
</table>

### DESIGNATION

<table>
<thead>
<tr>
<th>Privacy Sensitive System:</th>
<th>Yes</th>
<th>If “no” PTA adjudication is complete.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category of System:</td>
<td>IT System</td>
<td>If “other” is selected, please describe: Click here to enter text.</td>
</tr>
<tr>
<td>Determination:</td>
<td>[ ] PTA sufficient at this time.</td>
<td></td>
</tr>
</tbody>
</table>
- Privacy compliance documentation determination in progress.
- New information sharing arrangement is required.
- DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies.
- Privacy Act Statement required.
- Privacy Impact Assessment (PIA) required.
- System of Records Notice (SORN) required.
- Paperwork Reduction Act (PRA) Clearance may be required. Contact your component PRA Officer.
- A Records Schedule may be required. Contact your component Records Officer.

**PIA:**

If covered by existing PIA, please list: Click here to enter text.

**SORN:**

If covered by existing SORN, please list:

DHS/ALL-004 General Information Technology Access Account Records System (GITAARS), November 27, 2012, 77 FR 70792

**DHS Privacy Office Comments:**

*Please describe rationale for privacy compliance determination above.*

(b)(5), (b)(7)(E)
### Appendix A

<table>
<thead>
<tr>
<th>Agency</th>
<th>System of Records Notices (SORNs)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>U.S. Customs and Border Protection (CBP)</strong></td>
<td><strong>DHS/CBP-006 Automated Targeting System (ATS) SORN</strong></td>
</tr>
<tr>
<td></td>
<td><strong>DHS/CBP-011 TECS SORN</strong></td>
</tr>
<tr>
<td></td>
<td><strong>DHS/CBP-020 Export Information System (EIS) SORN</strong></td>
</tr>
<tr>
<td></td>
<td><strong>DHS/CBP-021 Arrival and Departure Information System (ADIS) SORN</strong></td>
</tr>
<tr>
<td><strong>U.S. Department of Homeland Security (DHS/ALL)</strong></td>
<td><strong>DHS/USVISIT-004 DHS Automated Biometric Identification System (IDENT) SORN</strong></td>
</tr>
<tr>
<td></td>
<td><strong>DHS/ALL-037 E-Authentication Records SORN</strong></td>
</tr>
<tr>
<td><strong>U.S. Immigration and Customs Enforcement (ICE)</strong></td>
<td><strong>DHS/ICE-001 Student and Exchange Visitor Information System (SEVIS) SORN</strong></td>
</tr>
<tr>
<td></td>
<td><strong>DHS/ICE-005 Trade Transparency Analysis and Research (TTAR) SORN</strong></td>
</tr>
<tr>
<td></td>
<td><strong>DHS/ICE-009 External Investigations SORN</strong></td>
</tr>
<tr>
<td></td>
<td><strong>DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER) SORN</strong></td>
</tr>
<tr>
<td><strong>U.S. Citizenship and Immigration Services (USCIS)</strong></td>
<td><strong>DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records</strong></td>
</tr>
<tr>
<td></td>
<td><strong>DHS/USCIS-002 Background Check Service SORN</strong></td>
</tr>
<tr>
<td></td>
<td><strong>DHS/USCIS-003 Biometric Storage System SORN</strong></td>
</tr>
<tr>
<td></td>
<td><strong>DHS/USCIS-007 Benefits Information System SORN</strong></td>
</tr>
<tr>
<td></td>
<td><strong>DHS/USCIS-010 Asylum Information and Pre-Screening System of Records SORN</strong></td>
</tr>
<tr>
<td><strong>U.S. Department of State</strong></td>
<td><strong>STATE-05 Overseas Citizens Records SORN</strong></td>
</tr>
<tr>
<td></td>
<td><strong>STATE-26 Passport Records SORN</strong></td>
</tr>
<tr>
<td></td>
<td><strong>STATE-39 Visa Records SORN</strong></td>
</tr>
</tbody>
</table>


PRIVACY THRESHOLD ANALYSIS (PTA)

This form is used to determine whether a Privacy Impact Assessment is required.

Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 and the Homeland Security Act of 2002.

Please complete this form and send it to your component Privacy Office. If you do not have a component Privacy Office, please send the PTA to the DHS Privacy Office:

Senior Director, Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 202-343-1717

Upon receipt from your component Privacy Office, the DHS Privacy Office will review this form. If a PIA is required, the DHS Privacy Office will send you a copy of the Official Privacy Impact Assessment Guide and accompanying Template to complete and return.

A copy of the Guide and Template is available on the DHS Privacy Office website, www.dhs.gov/privacy, on DHSConnect and directly from the DHS Privacy Office via email:
## PRIVACY THRESHOLD ANALYSIS (PTA)

### SUMMARY INFORMATION

<table>
<thead>
<tr>
<th>Project or Program Name:</th>
<th>HSI Use of DHS OBIM's IDENT Facial Recognition Systems</th>
</tr>
</thead>
<tbody>
<tr>
<td>Component:</td>
<td>Immigration and Customs Enforcement (ICE)</td>
</tr>
<tr>
<td>Office or Program:</td>
<td>Homeland Security Investigations (HSI)</td>
</tr>
<tr>
<td>Xacta FISMA Name (if applicable):</td>
<td>N/A</td>
</tr>
<tr>
<td>Xacta FISMA Number (if applicable):</td>
<td>N/A</td>
</tr>
<tr>
<td>Type of Project or Program:</td>
<td>Program</td>
</tr>
<tr>
<td>Project or program status:</td>
<td>Operational</td>
</tr>
<tr>
<td>Date first developed:</td>
<td>N/A</td>
</tr>
<tr>
<td>Date of last PTA update:</td>
<td>N/A</td>
</tr>
<tr>
<td>ATO Status (if applicable):</td>
<td>Choose an item.</td>
</tr>
<tr>
<td>ATO expiration date (if applicable):</td>
<td>Click here to enter a date.</td>
</tr>
</tbody>
</table>

### PROJECT OR PROGRAM MANAGER

<table>
<thead>
<tr>
<th>Name:</th>
<th><a href="6">b</a>, <a href="7">b</a>(C)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Office:</td>
<td>HSI</td>
</tr>
<tr>
<td>Title:</td>
<td>Program manager</td>
</tr>
<tr>
<td>Phone:</td>
<td>(361) 438</td>
</tr>
<tr>
<td>Email:</td>
<td><a href="6">b</a>, <a href="7">b</a>(C)</td>
</tr>
</tbody>
</table>

### INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

<table>
<thead>
<tr>
<th>Name:</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phone:</td>
<td>N/A</td>
</tr>
<tr>
<td>Email:</td>
<td>N/A</td>
</tr>
</tbody>
</table>
Specific PTA Questions

1. Reason for submitting the PTA: New PTA
### 2. Does this system employ any of the following technologies:

*If you are using any of these technologies and want coverage under the respective PIA for that technology please stop here and contact the DHS Privacy Office for further guidance.*

- [ ] Closed Circuit Television (CCTV)
- [ ] Social Media
- [ ] Web portal¹ (e.g., SharePoint)
- [ ] Contact Lists
- [X] None of these

### 3. From whom does the Project or Program collect, maintain, use, or disseminate information?

*Please check all that apply.*

- [ ] Members of the public
- [ ] DHS employees/contractors (list components):
- [ ] Contractors working on behalf of DHS
- [ ] Employees of other federal agencies

### 4. What specific information about individuals is collected, generated or retained?

(b)(5); (b)(7)(E)
<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>4(a) Does the project, program, or system retrieve information by personal identifier?</td>
<td>No. Please continue to next question.</td>
</tr>
<tr>
<td>4(b) Does the project, program, or system use Social Security Numbers (SSN)?</td>
<td>No. No. If yes, please list all personal identifiers used:</td>
</tr>
<tr>
<td>4(c) If yes, please provide the specific legal basis and purpose for the collection of SSNs:</td>
<td>Immigration and Nationality Act sections 328 and 329; U.S.A. PATRIOT Act of 2001, Public Law 107–56; the Border Security Act, Public Law 107–173; and the Implementing Recommendations of the 9/11 Commission Act of 2007, Public Law 110–53</td>
</tr>
<tr>
<td>4(d) If yes, please describe the uses of the SSNs within the project, program, or system:</td>
<td>HSI's submission of probe photos to IDENT does not use SSNs, but an IDENT return may include SSNs. This is incidental to the use of IDENT. HSI may use SSNs returned by IDENT to ensure clarity in identity resolution of the subjects of investigation.</td>
</tr>
<tr>
<td>4(e) If this project, program, or system is an information technology/system, does it relate solely to infrastructure?</td>
<td>No. Please continue to next question.</td>
</tr>
</tbody>
</table>
For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)? ☐ Yes. If a log kept of communication traffic, please answer the following question.

4(f) If header or payload data is stored in the communication traffic log, please detail the data elements stored.

N/A

5. Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems?

☐ No.
☒ Yes. If yes, please list:
OBIM

6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?

☒ No.
☐ Yes. If yes, please list:

6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?

N/A

7. Does the project, program, or system provide role-based training for personnel who have access in addition to annual privacy training required of all DHS personnel?

☒ No.
☐ Yes. If yes, please list:

8. Per NIST SP 800-53 Rev. 4, Appendix J, does the project, program, or system maintain an accounting of disclosures of PII to individuals who have requested access to their PII?

☒ No. What steps will be taken to develop and maintain the accounting:
Any disclosures will be noted through ICE case management systems, such as ICM.
☐ Yes. In what format is the accounting maintained:

---

3 When data is sent over the Internet, each unit transmitted includes both header information and the actual data being sent. The header identifies the source and destination of the packet, while the actual data is referred to as the payload. Because header information, or overhead data, is only used in the transmission process, it is stripped from the packet when it reaches its destination. Therefore, the payload is the only data received by the destination system.

4 PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes. Often, these systems are listed as “interconnected systems” in Xacta.
9. Is there a FIPS 199 determination? 

☐ Unknown.
☒ No.
☐ Yes. Please indicate the determinations for each of the following:

Confidentiality:
☐ Low ☐ Moderate ☐ High ☐ Undefined

Integrity:
☐ Low ☐ Moderate ☐ High ☐ Undefined

Availability:
☐ Low ☐ Moderate ☐ High ☐ Undefined

---

FIPS 199 is the Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems.
enforcement. The forthcoming update to DHS/ICE-009 will provide further transparency on HSI’s use of facial photographs for biometric purposes.

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

<table>
<thead>
<tr>
<th>DHS Privacy Office Reviewer:</th>
<th>b)(6), b)(7)(C)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PCTS Workflow Number:</td>
<td>Click here to enter text.</td>
</tr>
<tr>
<td>Date approved by DHS Privacy Office:</td>
<td>April 3, 2020</td>
</tr>
<tr>
<td>PTA Expiration Date</td>
<td>April 3, 2021</td>
</tr>
</tbody>
</table>

**DESIGNATION**

<table>
<thead>
<tr>
<th>Privacy Sensitive System:</th>
<th>Yes</th>
<th>If “no” PTA adjudication is complete.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category of System:</td>
<td>IT System</td>
<td>If “other” is selected, please describe: Click here to enter text.</td>
</tr>
</tbody>
</table>

**Determination:**

- [ ] PTA sufficient at this time.
- [ ] Privacy compliance documentation determination in progress.
- [ ] New information sharing arrangement is required.
- [ ] DHS Policy for Computer-Readable Extracts Containing Sensitive PHI applies.
- [ ] Privacy Act Statement required.
- [x] Privacy Impact Assessment (PIA) required.
- [x] System of Records Notice (SORN) required.
- [ ] Paperwork Reduction Act (PRA) Clearance may be required. Contact your component PRA Officer.
- [ ] A Records Schedule may be required. Contact your component Records Officer.

**PIA:**

- New PIA is required.
- If covered by existing PIA, please list: Forthcoming ICE Use of Facial Recognition Services PIA; DHS/ICE/PIA-045 ICM

**SORN:**

- System covered by existing SORN
- If covered by existing SORN, please list: Forthcoming update to DHS/ICE-009 External Investigations

**DHS Privacy Office Comments:**
Privacy in the Legislature.

- Democratic senator presses facial recognition company after reports of law enforcement collaboration

- Like CCPA, But Make it Virginia: States Scramble to Introduce Data Privacy Legislation of Their Own

  “Virginia added itself to the ever-growing list of states considering such bills when the Virginia Privacy Act (VPA) was introduced to the General Assembly for consideration January 8.”

Privacy in the Courts.

- Supreme Court declines to hear Facebook facial recognition case

  “The Supreme Court on Tuesday declined to take up a high-profile court battle over whether users can sue Facebook for using facial recognition technology on their photos without proper consent.”

- Clearview AI Hit With Biometric Privacy Lawsuit

- IBM Hit With Lawsuit Claiming Image Use for Facial Recognition

  “IBM Corp. allegedly used people’s images without permission to develop facial recognition technology in violation of Illinois’ biometric privacy law, according to class claims filed in an Illinois state court.”
• Immigrants Win Access To USCIS Data In Vetting Program Suit

"More than two dozen documents detailing how the U.S. Citizenship and Immigration Services evaluates immigration applications — including the agency's scoring methodologies, risk factors and indicators of national security concerns — must be handed over to class counsel within three weeks, U.S. District Judge Richard A. Jones ruled Thursday."

Privacy in the Executive Branch

• DNA Collection at the Border Threatens the Privacy of All Americans

"On January 6, the federal government began collecting DNA from any person in immigration custody — previously, it had required only fingerprints. With this move, the federal government took a decisive step toward collecting and tracking large numbers of its citizens’ genetic information too."

• Weleakinfo, a search engine for breached personal data, shut down
https://www.cyberscoop.com/weleakinfo-shutdown-personal-information-for-sale/

"The U.S. Department of Justice on Thursday announced its seized weleakinfo.com, which has existed since 2017. The site sold different subscription levels, making it possible for scammers to access and search through the database."

Privacy in the Private Sector.

• The US needs a national privacy law for personal data, Salesforce co-CEO says

• So far, under California’s new privacy law, firms are disclosing too little data — or far too much
https://www.washingtonpost.com/technology/2020/01/21/ccpa-transparency/

• Apple vs FBI: Pensacola Isn’t San Bernardino

• 250 million Microsoft customer service records briefly exposed online: report
https://thehill.com/policy/cybersecurity/479426-250-million-microsoft-customer-service-
Privacy in the Public Sector.

- Privacy International Report on “Cloud Extraction” Programs Sheds Light on Far-Reaching Government Surveillance Technology

  “Authentication tokens for various cloud services can remain active for weeks at a time, and in some cases are permanent. If the investigating agency can extract these tokens, they do not need to coerce the subject into giving up login information; if they already have login information, they can maintain ongoing access even if the subject later changes their password. This also allows them to circumvent most two-factor authentication (2FA) measures.”

- Hospitals Give Tech Giants Access to Detailed Medical Records

  “Hospitals have granted Microsoft Corp., International Business Machines Corp. and Amazon.com Inc. the ability to access identifiable patient information under deals to crunch millions of health records, the latest examples of hospitals’ growing influence in the data economy.”

Privacy around the World.

- Britain Plans Vast Privacy Protections for Children

  “The rules will require social networks, gaming apps, connected toys and other online services that are likely to be used by people under 18 to overhaul how they handle those users’ personal information. In particular, they will require platforms like YouTube and Instagram to turn on the highest possible privacy settings by default for minors, and turn off by default data-mining practices like targeted advertising and location tracking for children in the country.”

- EU considers temporary ban on facial recognition in public spaces
  https://www.politico.eu/pro/eu-considers-temporary-ban-on-facial-recognition-in-public-
• London Police Amp Up Surveillance With Real-Time Facial Recognition

• Amazon Alexa Eavesdropping Spurs EU-Wide Privacy Safeguards

• Thousands of Chinese Students’ Data Exposed on Internet

Your Devices, Your Privacy.

• The Apps on My Phone Are Stalking Me

  “Your location, your purchases, video and audio from within your home and office, your online searches and every digital wandering, biometric tracking of your face and other body parts, your heart rate and other vital signs, your every communication, recording, and perhaps your deepest thoughts or idlest dreams — in the future, if not already, much of this data and more will be collected and analyzed by some combination of governments and corporations, among them a handful of megacompanies whose powers nearly match those of governments.”

• People Are Calling SWAT Teams to Tech Executives’ Homes

  “Swatting is online lingo used to describe when people call the police with false reports of a violent crime of some sort inside a home, hoping to persuade them to send a well-armed SWAT team. [...]”

  “The attacks have been aided by forums that have sprung up both on the public internet and on the camouflaged sites of the so-called dark web. These forums name thousands of people, from high-ranking executives to their extended families, who could be targets, providing cellphone numbers, home addresses and other information.”

• Google and Apple Clash Over Web Browser Privacy
“Instead of making a big list of cookies to block, Apple’s ITP continuously learns what websites users visit and which kinds of cookies try to hitch a ride. Over time, this creates unique cookie-blocking algorithms for each web surfer that can be used to identify and track them, according to the paper.”

- Equifax Breach Affected 147 Million, but Most Sit Out Settlement

Have a wonderful weekend and an even better National Data Privacy Day (if it’s not already blocked off on your calendar, it’s next Tuesday)!

Kind regards,

[b](6); [b](6); [b](6); [b](6);

Chief Privacy Officer
Office of the Executive Director | U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202.41
Good morning,

Tag, you're it.

Thanks!

Mobile: 202-87...

Good morning,

...
Please let me know if you have any questions in the meantime – I know this process can get confusing. I’m also happy to set up a meeting with the team if you think that would be helpful.

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-73
Mobile: 202-7
Main: 202-732-3300
Chief Privacy Officer
Department of Homeland Security
From: (b)(6); (b)(7)(C)
Sent: Tue, 21 Jan 2020 20:46:04 +0000
To: (b)(6); (b)(7)(C)
Subject: FW: The Secretive Company That Might End Privacy as We Know It

Forwarding for your awareness.

(b)(6); (b)(7)(C)

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732- (b)(6)
Mobile: 202-70 (b)(l)(C)
Main: 202-732-3300.

From: cbp.dhs.gov>
Sent: Saturday, January 18, 2020 8:56 PM
To: (b)(6); (b)(7)(C)
Subject: FW: The Secretive Company That Might End Privacy as We Know It

FYI.

We will need a coordinated media response; there will likely be inquiries.

United States Government Accountability Office

Face Recognition Technology: Main Questionnaire

Introduction

The U.S. Government Accountability Office (GAO) is conducting a review of face recognition technology (FRT) at the request of Congress. As part of the review, GAO is sending this questionnaire to over 40 federal organizations that employ law enforcement officers. This questionnaire asks whether the federal organizations have used FRT, including FRT owned by the organizations or other entities. In addition, the questionnaire asks about photos used in face recognition searches/comparisons.

Scope of Questionnaire

- Throughout this questionnaire, your organization refers to only the organization named in our email, and includes all of the organization’s offices, employees, and contractors.
- We are defining face recognition technology (FRT) as a type of automated or semi-automated biometric technology that uses images for verification, identification, and/or investigative purposes. FRT can be used for a variety of applications, such as verifying the identity claimed by an individual, identifying if an unknown individual exists in a gallery of known people, or comparing an unknown person to a gallery of known people to develop an investigative lead.
- A system with FRT may include a face recognition algorithm, hardware, software, and a photo database.
- We are including all uses of FRT by your organization within the scope of our review, with one exception: do not include FRT that is solely used to authenticate the identity of your organization’s employees and contractors to log into computers and phones. However, if there are plans to use this FRT for other purposes, such as site access, include the FRT in your organization’s responses. If your organization is unsure whether its use of FRT is within the scope of this questionnaire, we encourage your organization to be overly inclusive.

Instructions

- Before starting to fill out this questionnaire and its attachments, save them to a local drive. Your organization will only need to fill out one copy of this Main Questionnaire, but may need to fill out more than one copy of the attachments depending on how many systems with FRT and photo databases your organization had at any point during January 1, 2015 through March 31, 2020.
- The results of this questionnaire will be included in summary form in our final report, which will be made available to the public on our website. We will also report results on an individual organization basis for some questions. If any responses to this questionnaire constitute sensitive information that require password protection or special handling instructions, please include such pertinent information when returning the questionnaire. If any responses require the disclosure of classified information, please inform GAO in the questionnaire and/or contact GAO. GAO will follow-up accordingly to discuss this information further.
- Save and email the completed questionnaire, attachments, and requested documents to FRTSurvey@gao.gov. If your organization has any questions regarding the questionnaire or our overall review, please contact GAO at the email above.
**Main Questionnaire**

*Your Organization’s Systems with FRT and Photo Databases*

The following questions will help us understand whether your organization has or had systems with FRT and photo databases. Your organization’s answers will determine which of the attachments should be completed.

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
<th>Requested Action 1</th>
<th>Requested Action 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. At any point during January 1, 2015 through March 31, 2020, did your organization <strong>have a system</strong> with face recognition capabilities—that is, a system that was developed or procured by your organization?</td>
<td>Yes ➔</td>
<td>IF YES: How many systems?</td>
<td>Please complete one copy of the “FRT Attachment” for each system.</td>
</tr>
<tr>
<td></td>
<td>No</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Don’t know</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. At any point during January 1, 2015 through March 31, 2020, did your organization <strong>have a photo database</strong> (i.e., collection of facial images)—that is, a database that was developed or procured by your organization? Please only include databases that were used or planned to be used with FRT.</td>
<td>Yes ➔</td>
<td>IF YES: How many databases?</td>
<td>Please complete one copy of the “Photos Attachment” for each database.</td>
</tr>
<tr>
<td></td>
<td>No</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Don’t know</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Main Questionnaire

FRT Owned and Operated by an Outside Entity

As a reminder, throughout this questionnaire, your organization includes all of your organization’s offices, employees, and contractors.

3. At any point during the last two years (April 1, 2018 through March 31, 2020), did your organization conduct face recognition searches/comparisons by accessing a system (i.e., logging into a system) owned/operated by another entity? Other entities include, but are not limited to:
   - Federal entities
     - Please include any federal entity outside of your organization. For example, if your organization falls under a department (e.g., Department of Justice), please include other organizations that fall under that department.
   - State, local, tribal, or territorial entities
   - Non-government entities, such as companies that offer FRT services

☐ Yes
☐ No
☐ Don’t know

IF YES: What type(s) of entities owned/operated the systems that your organization accessed to conduct searches/comparisons? (Please select all that apply.)

☐ Federal
☐ State, local, tribal, or territorial
☐ Non-government
☐ Other - please describe:

[Blank space for description]
4. At any point during the last two years (April 1, 2018 through March 31, 2020), did your organization request that another entity use its system to conduct face recognition searches/comparisons on behalf of your organization? Similar to the previous question, other entities can include federal, state, local, tribal, and territorial entities; and non-government entities.

   - Yes
   - No
   - Don’t know

   IF YES: What type(s) of entities conducted searches/comparisons on your organization’s behalf? (Please select all that apply.)

   - Federal
   - State, local, tribal, or territorial
   - Non-government
   - Other - please describe:

5. Does your organization maintain a list of systems owned/operated by other entities that your organization allows its employees and contractors to use for face recognition searches/comparisons? Please answer as of March 31, 2020.

   - Yes
   - No
   - Don’t know
   - N/A
6. At any point during the last two years (April 1, 2018 through March 31, 2020), has your organization submitted a photo(s) to the following non-government FRT service provider(s)? Please only include service providers that used their own photo databases to conduct face recognition searches/comparisons with your organization’s submitted photo(s). (Please list any other service providers in the last row.)

<table>
<thead>
<tr>
<th>Non-government FRT service provider name</th>
<th>Submitted a photo(s)?</th>
<th>IF YES: Estimated number of photos submitted to the service provider by your organization during last two years</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Amazon Rekognition</td>
<td></td>
<td><img src="image" alt="Options" /></td>
</tr>
<tr>
<td>b. Clearview AI (formerly known as Smartcheckr)</td>
<td></td>
<td><img src="image" alt="Options" /></td>
</tr>
<tr>
<td>c. Vigilant Solutions</td>
<td></td>
<td><img src="image" alt="Options" /></td>
</tr>
<tr>
<td>d. Others - please provide the name of the service provider(s):</td>
<td><img src="image" alt="Blank" /></td>
<td><img src="image" alt="Blank" /></td>
</tr>
</tbody>
</table>
Main Questionnaire

Other FRT

7. At any point during January 1, 2015 through March 31, 2020, was your organization in the process of developing or procuring a system with FRT? Please note, systems that were ultimately developed or procured should be captured in Question 1.

- [ ] Yes
- [ ] No
- [ ] Don’t know

IF YES: What system(s) with FRT was your organization in the process of developing or procuring? (Please itemize separate systems below, listing all remaining answers in the last row if there are more than 5.) For each of the systems listed below, we will ask for relevant documents in the “Documentation Requests” section at the end of this questionnaire.

<table>
<thead>
<tr>
<th>System name (if known)</th>
<th>Description of how the FRT can be used to support your organization’s programs and activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. RAVEn</td>
<td></td>
</tr>
<tr>
<td>2. National Child Victim Identification System</td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td></td>
</tr>
<tr>
<td>6. Others:</td>
<td></td>
</tr>
</tbody>
</table>

8. Did your organization have any other FRT capabilities or uses at any point during January 1, 2015 through March 31, 2020, that were not already captured in any of the previous questions?

- [ ] Yes
- [ ] No
- [ ] Don’t know
Main Questionnaire

IF YES: What were those capabilities or uses? (Please describe in the box below.)

9. Does your organization have memorandums of understanding (or other similar agreements) with states to be able to request face recognition searches/comparisons of the states’ photo databases? Please answer as of March 31, 2020.

☐ Yes
☐ No
☐ Don’t know

IF YES: With what states does your organization have memorandums of understanding (or other similar agreements)? (Please itemize separate states below, listing all remaining answers in the last row if there are more than 5.)

<table>
<thead>
<tr>
<th>State name</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Pennsylvania</td>
<td></td>
</tr>
<tr>
<td>2. Maryland</td>
<td></td>
</tr>
<tr>
<td>3. Florida</td>
<td></td>
</tr>
<tr>
<td>4. New York/New Jersey HIDTA</td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td></td>
</tr>
<tr>
<td>6. Others:</td>
<td></td>
</tr>
</tbody>
</table>

10. Does your organization have memorandums of understanding (or other similar agreements) with other federal agencies to be able to request face recognition searches/comparisons of the federal agencies’ photo databases? Please answer as of March 31, 2020.

☐ Yes
☐ No
☐ Don’t know
Main Questionnaire

IF YES: With what other federal agencies does your organization have memorandums of understanding (or other similar agreements)? (Please itemize separate agencies below, listing all remaining answers in the last row if there are more than 5.)

<table>
<thead>
<tr>
<th>Federal agency name</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
</tr>
<tr>
<td>2.</td>
</tr>
<tr>
<td>3.</td>
</tr>
<tr>
<td>4.</td>
</tr>
<tr>
<td>5.</td>
</tr>
<tr>
<td>6. Others:</td>
</tr>
</tbody>
</table>

Photo Databases

11. At any point during January 1, 2015 through March 31, 2020, was your organization in the process of developing or procuring a database of facial images (i.e., collection of facial images) to be used with FRT? Please note, databases that were ultimately developed or procured should be captured in Question 2.

- [ ] Yes
- [ ] No
- [ ] Don’t know
**Main Questionnaire**

IF YES: What database(s) was your organization in the process of developing or procuring?  
(Please itemize separate databases below, listing all remaining answers in the last row if there are more than 5.)

<table>
<thead>
<tr>
<th>Database name (if known)</th>
<th>Name of FRT system(s) to be used with the database</th>
<th>Type of photos (e.g., mugshots or passport photos), and estimated number of photos</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. War Crimes Hunter</td>
<td>(b) (/)(E)</td>
<td>social media captures of evidence of human rights violations (unknown number)</td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6. Others:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Additional Comments**

12. If needed, please provide any additional comments or information to explain your organization's answers to any of the previous questions in this questionnaire.
Main Questionnaire

Documentation Requests

If your organization is in the process of developing or procuring a system with FRT (i.e., you answered YES to Question 7), please email GAO the following documents for each system included in the table for Question 7.

- Privacy Impact Assessment that was issued for the FRT.
- System of Records Notice for the FRT.
- Documentation that provides a detailed description of the FRT capability, including how the FRT will be used by your organization. If this information is already covered by the Privacy Impact Assessment or System of Records Notice, then no additional documents are needed. If this information is not covered, examples of documents that can be emailed to GAO include user guides, policies, and procedures documents.

Please save your organization’s completed questionnaire and email it to:

FRTSurvey@gao.gov
MEMORANDUM FOR: ICE Deputy Privacy Officer
FROM: ICE Privacy Analyst
SUBJECT: Report on ICE’s use of Facial Recognition Services

PURPOSE
The purpose of this report is to survey ICE’s use of facial recognition technologies. The memorandum will summarize ICE’s general mission posture in regard to facial recognition technologies, state the common privacy risks in facial recognition technologies, and then compare the processes and privacy risks apparent in different programs. The report will then analyze each program’s use of facial recognition technologies and their efforts toward privacy compliance.

EXECUTIVE SUMMARY

[Redacted]

[Redacted]
(b)(6), (b)(7)(C)
(b)(5)
From: (b)(6); (b)(7)(C)
Sent: Mon, 6 Apr 2020 17:23:46 +0000
To: (b)(6); (b)(7)(C)
Subject: FR PIA big questions
Attachments: RE: Quick call about Facial Recognition

(b)(5)

(b)(6); (b)(7)(C)
Privacy Analyst, J.D., CIIP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-(b)(6); (b)(7)(C)
Mobile: 202-8-(b)(6); (b)(7)(C)
Main: 202-732-(b)(6); (b)(7)(C)
Hi [REMOVED] (b)(6) (b)(7)(C)

Please see responses below.

As a follow up to my earlier e-mail a meeting just blocked my 1200-1300 today.

Thanks a bunch,

[REMOVED] (b)(6) (b)(7)(C)

---

From: [REMOVED] (b)(6) (b)(7)(C)
Sent: Mon, 6 Apr 2020 14:41:03 +0000
To: [REMOVED] (b)(6) (b)(7)(C)
Subject: RE: Quick call about Facial Recognition

---

Hi [REMOVED] (b)(6) (b)(7)(C)

Please see responses below.

As a follow up to my earlier e-mail a meeting just blocked my 1200-1300 today.

Thanks a bunch,

[REMOVED] (b)(6) (b)(7)(C)

---

From: [REMOVED] (b)(6) (b)(7)(C)
Sent: Friday, April 3, 2020 11:58 AM
To: [REMOVED] (b)(6) (b)(7)(C)
Subject: Quick call about Facial Recognition

---

Good Morning [REMOVED] (b)(6) (b)(7)(C),

Do you have time Monday for a quick call on ICE use of facial recognition services? DHS Privacy got back to us on our PIA and wants to institute some safeguards/constraints, and I was hoping to see how doable their recommendations were. The biggest ticket items:

[REMOVED] (b)(5)
Good Afternoon,

Best,

Privacy Analyst, J.D., CIPP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-
Mobile: 202-
Main: 202-3300
b)(5)

Do we already have an adjudicated PTA on this? I remember reviewing one a little while back. Also, how did today’s training go?

Sent with BlackBerry Work (www.blackberry.com)
FW: Clearview AI

Thanks again,

Deputy Chief Information Security Officer (A)
Office of Chief Information Security Officer
U.S. Immigration and Customs Enforcement

DHS Cybersecurity Services Provider (CSP) & Center of Excellence (COE)
Looping you in since this was never routed to us as a formal procurement. Given the recent data breach, this poses a legitimate concern.

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732
Mobile: 202-7...
Main: 202-732-3300

Good morning,
Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-\[\text{redacted}\]
Mobile: 202-7\[\text{redacted}\]
Main: 202-732-3300
Find enclosed with supporting materials

Best,

Privacy Analyst, J.D., CIPP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-(b)(6)
Mobile: 202-87-(b)(7)(C)
Main: 202-732-3300
Face Search Results
Report prepared Jan 14, 2020

Disclaimer: Results from facial recognition searches are to be treated as intelligence ONLY; these results cannot be used in court, or as part of the case file, as the method of identification. This report is not to be disseminated to an outside agency.
Here’s our most recent response to DHS Privacy on the PIA for your reference. I’ll make sure to send you DHS’s next edits when I get them back, that version should be cleaner. Highlights to draw your attention to:

Privacy Analyst, J.D., CIPP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732
Mobile: 202-8
Main: 202-732
Homeland Security

Privacy Impact Assessment
DHS/ICE/PIA-0xxx ICE Use of Facial Recognition Services
Page 4

(b)(5); (b)(7)(E)

(b)(5)

(b)(5); (b)(7)(E)

(b)(5); (b)(7)(E)

(b)(5); (b)(7)(E)
(b)(5), (b)(7)(E)
From: Privacy Analyst, J.D., CIPP/US/G
To: Privacy Analyst, J.D., CIPP/US/G
Subject: notes from Thursdays meeting
Please see attached.
TO: [Redacted]
FROM: [Redacted]
RE: Meeting on Clearview PIA (03 12 20)
DATE: 03/13/20

[b][6]; (b)[7](C) called a meeting for the following purpose:

Identify ways the PMO, IG, and Privacy teams can work together with the Clearview AI Project/PIA
- Intake of requirements
- Project schedule development
- Office coordination
- Delivery
- Intra- and inter-agency notification/deconfliction

The meeting took place in office, with the following attendees:

[b][6]; (b)[7](C)

[b][6] started the meeting by saying he wanted Intake and PMO “married up” with program units such as Privacy to improve tracking and efficiencies in certain situations. His example: if it’s just a matter of editing a paragraph in a SORN, then Privacy can take care of it. However, if it’s a situation where there is “information sharing,” then “we need linkage and tracking. – Privacy needs to involve PMO and Intake.”
On Friday, 3/13, at 3:15 PM, Privacy emailed all attendees the timeline that was requested.

Facial Recognition
PIA (Clearview) Level 2
Good Morning,

Find enclosed my pending matters for our bi-weekly check in, as well as the most recent version of the FR PIA if you wanted to review it while we talk.

Privacy Analyst, J.D., CIPP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-6111
Mobile: 202-878-0087
Main: 202-732-3300
Pending Matters – 03-16-2020

(b)(6) (b)(7)(C)
The HSI Data Warehouse is a data storage environment that serves as a repository for ICM system data. It receives a direct feed once every 24 hours containing a refresh of ICM data, including new records and edits to previously existing records. For more information on HSI Data Warehouse see DHS/ICE/PIA/045 ICM.
Find enclosed for our meeting at 1:15. I’ll call you. Thanks!

Privacy Analyst, J.D., CIIP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732
Mobile: 202-8
Main: 202-732
Find enclosed for our meeting at 1:15

Privacy Analyst, J.D., CIIPP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement

Desk: 202-732
Mobile: 202-8
Main: 202-732
Good morning,

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-1111
Mobile: 202-701-1234
Main: 202-732-1234

---

From: [Redacted]
Sent: Fri, 3 Apr 2020 20:28:37 +0000
To: [Redacted]
Cc: [Redacted]
Subject: ICE Facial Recognition Privacy Impact Assessment (PIA)
Attachments: PIA ICE - ICE Use of Facial Recognition Services (unresolved issues 04 02 20).docx
Importance: High
Privacy Impact Assessment for the

(b)(5)

No S
Call to Discuss Clearview.

Conference Line: 1-866-6
PIN
Preliminary Questions: 
From: [redacted]  
Sent: Tue, 10 Mar 2020 16:42:22 +0000  
To: [redacted]  
Subject: IGP Intake Process Discussion - Clearview AI  

Purpose: [redacted]
Best,

Mobile: 202-870

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-
Mobile: 202-7-
Main: 202-732-3300

From: pice.dhs.gov>
Sent: Tuesday, December 3, 2019 10:14 AM
To: pice.dhs.gov>
Subject: FW: Clearview

Good morning

Thanks,
Thanks for working with us! I’ve gotten a couple responses back on time for the demo, it’s looking like Tuesday from 10-3 will be best. I just need two more responses to confirm.

Best,

Mobile: 202-870

That sounds good.

Best,

Mobile: 202-870


Does that make sense.

Section Chief
Cyber Crimes Center (C3) | Child Exploitation Investigations Unit (CEIU)
DHS = ICE | Homeland Security Investigations | Victim Identification Program
Cell: (503) 205-2473

From: ice.dhs.gov
Sent: Thursday, April 23, 2020 2:32 PM
To: ice.dhs.gov
Cc: ice.dhs.gov

Subject: RE: Clearview Demo

Best,

Mobile: 202-87

From: ice.dhs.gov
Sent: Thursday, April 23, 2020 2:51 PM
To: ice.dhs.gov
Cc: ice.dhs.gov

Subject: RE: Clearview Demo
From: [redacted]
Sent: Thursday, April 23, 2020 12:34 PM
To: [redacted]
Cc: [redacted]
Subject: RE: Clearview Demo

Best,

From: [redacted]
Sent: Thursday, April 23, 2020 12:18 PM
To: [redacted]
Cc: [redacted]
Subject: RE: Clearview Demo

Sorry for the delay on this. Are you all available next Monday day or Tuesday in the morning for this demo? Please let me know and we will make it happen.

Thanks and I hope you are staying safe and healthy.

Section Chief
Child Exploitation Investigations Unit
Cyber Crimes Center
Homeland Security Investigations
Subject: Clearview Demo

Good Morning...

Best,

Privacy Analyst, J.D., CIPP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-3300
Mobile: 202-8...
Good afternoon,

I am also free between 10-3 on Tuesday.

Respectfully,

[Name]
Privacy Analyst
DHS Privacy Office

I am pretty full on Monday. At this moment, I am free 10-3 on Tuesday.

Thanks for coordinating!

[Name]
Senior Director, Privacy Compliance
DHS Privacy Office

epic.org  EPIC-20-03-06-ICE-FOIA-20211015-9th-Interim-Production  001435
2021-ICLI-00005  1435
Good Afternoon Everyone,

Tom C3 has been able to set up a Clearview demo for either next Monday or Tuesday. I was hoping to gauge everyone’s availability for the two days. Also please let me know if anybody else needs to be in on demo. Thanks!

Best,

Privacy Analyst, J.D., CIPP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-
Mobile: 202-8-
Main: 202-732-3300
Thanks for making the edits here. At this point, I'd recommend accepting all changes and submitting to (even though we know it won't be adjudicated). Do you mind copying me as well when you submit?

Best,

Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-1811
Mobile: 202-732-3300
Hi

Just a couple final questions on this one before we submit. However, I know that DHS will not adjudicate this in the near future.

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-
Mobile: 202-70_
Main: 202-732-3300

Find enclosed my responses. CEIU says they are ready to draft up some policy documents (ROBs, SOPs, etc) for using Clearview. I didn't know if you wanted to wait until after your meeting with DHS so we can get their requirements as well.

Best,

My edits and comments are attached. Let me know if you have any questions.

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-
Mobile: 202-70_
Good Morning

Find enclosed the Clearview PTA for your review, as reviewed and edited the PTA.

Best,

Privacy Analyst, J.D., CIPP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732
Mobile: 202-8
Main: 202-732-3300
No worries. I just wanted to make sure you were briefed in case DHS sets a meeting on the subject soon.

Best,

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-3300
Mobile: 202-732-3300

Good Morning,

Find enclosed the Clearview PTA for your review. It was reviewed and edited the PTA.

Best,

Privacy Analyst, J.D., CIPP/US/G
Good day.

Really appreciate your acknowledging receipt as well as your consideration of questions posed.

Thank you for reaching out to the vendor. I plan on reading the answers shortly.

Best,

Good morning.

Thanks for the turnaround. You have some questions that I can't answer, and will have to go back to the vendor which may take awhile. Here's the rest of the answers in the meantime.

Best,

Mobile: 202-870

Good afternoon Kameron,

Thank you for the draft ClearView PTA and for the background materials.

The PTA looks good. Many comments are conversational – aiming to better understand PII data flow-life cycle. I can think of a few other items to “flag,” however, they would not be applicable until the drafting of a PIA.

A demo would probably help a lot (understand one may not be feasible given this time turnaround). The “Clearview AI Inc.Sept. 9” document (in the share drive) has screen shots which are comparable to a demo—helpful. Have not reviewed all the procurement documents in the interest of time – but I will do so, as needed. Agree with you that background materials feel one-sided, or promotional. It is hard to believe that a 100% accuracy could be achieved.
Let me know if you have any questions, or if you would like to briefly talk through ClearView further.

Thanks!

---

Sent: Thursday, December 12, 2019 3:48 PM

Good Afternoon

Privacy Analyst, J.D., CIPP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-
Mobile: 202-87-
Main: 202-732-3300
Sorry for the delay, I thought that we had answered all of the follow up questions.

I have asked to take a look and work on getting those answers to you.

Good Morning All,

DHS Privacy has heard ICE is using Clearview and wants to be briefed. Any chance I could get your responses to the PTA back this week? I've attached the previous version just in case.

Best,

Good Afternoon Everyone,

I wanted to check on the status of this. Let me know if you have any questions or I can help with anything. Thanks.

Best,
Good Afternoon All,

I’m still working with [b](6); (b)(7)(C) to figure out if Clearview is covered by an ICE security boundary (or if it even needs to be) but I figure I can add that in later. Find enclosed some of my edits and questions based on our conversation the other day. Please edit for accuracy. Thanks again.

Best,

Privacy Analyst, J.D., CIPP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-[b](6); (b)(7)(C)
Mobile: 202-87-[b](6); (b)(7)(C)
Main: 202-732-3300
Best,

Mobile: 202-870-6868

Sent with BlackBerry Work
(www.blackberry.com)
To: [REDACTED]  
Subject: RE: Clearview software

So do you know if it’s currently in use? I don’t know if we ever actually approved the procurement.

Sent with BlackBerry Work  
(www.blackberry.com)

From: [REDACTED]  
Date: Wednesday, Sep 25, 2019, 3:30 PM  
To: [REDACTED]  
Subject: RE: Clearview software

Hey,

Best,

[REDACTED]

Mobile: 202-870 [REDACTED]

From: [REDACTED]  
Sent: Wednesday, September 25, 2019 3:24 PM  
To: [REDACTED]  
Subject: FW: Clearview software

Do we already have an adjudicated PTA on this? I remember reviewing one a little while back.

Also, how did today’s training go?

Sent with BlackBerry Work  
(www.blackberry.com)

From: [REDACTED]  
Date: Wednesday, Sep 25, 2019, 3:16 PM  
To: [REDACTED]  
Subject: Clearview software
You guys use this?

Looks creepy as hell. Scans social media and open source pictures to find subjects.
Sorry, I thought today was Tuesday. I'll be available all day tomorrow to work on it.

Sent with BlackBerry Work
(www.blackberry.com)

Hi [b](6);

Find enclosed a cleaner version of the PIA. It's still very much a rough draft and there are some mitigators I haven't fleshed out yet. When we get closer to a final product we will also need to task it out to HSI to make sure the safeguards/workflows I've proposed in the PIA are feasible.

Best,
[b](6);

Mobile: 202-87t
Hi [b](6); (b)(7)(C)

Do you think it's realistic to have a draft FR PIA to me by next week at the latest? It looks like getting this done is going to be a Director's Office priority given the Clearview information. Happy to take some of it off your hands, specifically in the risk/mitigation section.
Sure thing.

Best,

Mobile: 202-87

Thanks very much for the write-up. Could you make a few small changes and re-send to me by 3pm tomorrow?

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732
Mobile: 202-7
Main: 202-732-3300
Best,

Privacy Analyst, J.D., CIPP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-5(b)(6);
Mobile: 202-87(b)(7)(C)
Main: 202-732-3300
(o)(6)
42 See DHS/ICE-009 External Investigations, 75 FR 404 (January 5, 2010). This SORN is currently in the process of being updated.
Good morning team,

I came across a couple articles today on IAPP that might be of interest to you. See below:


https://www.buzzfeednews.com/article/ryanmac/clearview-ai-no-facial-recognition-private-companies


Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-
Mobile: 202-7
Good morning team,

I hope everyone had a relaxing and enjoyable Super Bowl weekend! Just a few quick items for you today, and please let me know if you have any questions. Also, if you have any items you'd like me to include for next week's update, please let me know.

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732
Mobile: 202-732
Main: 202-732-3300
From: [Redacted]
Sent: Thu, 27 Feb 2020 18:01:16 +0000
To: [Redacted]
Subject: procurement authorizor
Attachments: ITSР stamp Clearview AI SEP19.pdf

Requestor - [Redacted]
Card Holder - [Redacted]
Approved by - [Redacted]

Privacy Analyst, J.D., CIPP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-[Redacted]
Mobile: 202-8-[Redacted]
Main: 202-732-3300
Good morning,

I hope all is well. I heard that USSS and ICE might be using this technology. Is that the case? If so, we should probably talk.

Thanks,

All e-mail to/from this account is subject to official review and is for official use only. Action may be taken in response to any inappropriate use of the Secret Service's e-mail system. This e-mail may contain information that is privileged, law enforcement sensitive, or subject to other disclosure limitations. Such information is loaned to you and should not be further disseminated without the permission of the Secret Service. If you have received this e-mail in error, do not keep, use, disclose, or copy it; notify the sender immediately and delete it.
Thanks. See you tomorrow.

Section Chief
Cyber Crimes Center (C3) | Child Exploitation Investigations Unit (CEIU)
DHS - ICE | Homeland Security Investigations | Victim Identification Program
Cell: (503) 209-209-

Yes they do! I'll try to get something set up.

Best,

Mobile: 202-87-

I think we are planning on doing it on teams. Does everyone have access?

Section Chief
Cyber Crimes Center (C3) | Child Exploitation Investigations Unit (CEIU)
DHS - ICE | Homeland Security Investigations | Victim Identification Program
Cell: (503) 209-209-

Do you have the details for the call in on the demo? I can put it into the meeting invite for tomorrow.
Thanks again!

Do you have the details for the call in on the demo? I can put it into the meeting invite for tomorrow.
Thanks again!
Privacy Analyst, J.D., CIPP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-(b)(6), (b)(7)(C)
Mobile: 202-8---
Main: 202-732-3300
RE: ClearView for the WAR report

Best,

Mobile: 202-8

RE: ClearView for the WAR report

This is all I want to say in the WAR:

But, as played below, I want to add more.

So, here is one suggestion, but please feel free to add/edit.

Thoughts?
From: [b](6); [b](7); [c]
dhs.gov>
Sent: Friday, February 14, 2020 11:47 AM
To: [b](6); [b](7); [c] dhs.gov>
Subject: ClearView for the WAR report

Hey [b](6); [b](7); [c]  

Best,  
[b](6); [b](7); [c]
Never mind got it

On Mon, Dec 23, 2019 at 3:02 PM clearview.ai wrote:
Can someone share the dial-in info with me?

On Mon, Dec 23, 2019 at 11:55 AM @ice.dhs.gov wrote:
I’m in.

Sent with BlackBerry Work
(www.blackberry.com)
Hello everyone,

Can we do a call at, let's say, 3pm? I'm happy to talk to you all then. I'm also happy to do after Jan. 6 if that works better for you.

On Mon, Dec 23, 2019 at 10:36 AM @ice.dhs.gov> wrote:

Good Morning

It looks like we are available anytime between 2:30 and 4. If that doesn’t work for you it looks like we may need to push the call until the week of Jan 6.

Thanks,

Mobile: 202-870

From:

Sent: Monday, December 23, 2019 10:19 AM

To:

Cc:

Subject: Re: Clearview Legal questions
A call on this afternoon would be good. We can also talk sometime after Christmas. What
time works best for you?

On Fri, Dec 20, 2019 at 10:30 AM @ice.dhs.gov> wrote:

Good Morning

Thanks for your help,

Mobile: 202-870-6060
Sent with BlackBerry Work
(www.blackberry.com)

From: cleareview.ai>
Date: Thursday, Dec 19, 2019, 1:04 PM
To: cleareview.ai>
Subject: Re: Clearview Legal questions

Yes
And to (copied)

On Dec 19, 2019, at 2:53 PM, ice.dhs.gov> wrote:

You want me to refer him to you?

From: ice.dhs.gov>
Sent: Thursday, December 19, 2019 4:35 AM
To: ice.dhs.gov>
Subject: Clearview Legal questions

Good Morning

Best,
-- Regards,
(b)(5), (b)(7)(C)

Clearview AI
clearview.ai
949-278(b)(5)

-- Regards,
(b)(5), (b)(7)(C)

Clearview AI
clearview.ai
949-278(b)(5)
Thanks, We’ll take a look and let you know Monday if we need any edits.

Good afternoon -

(202) 733-8977
(202) 897-3777
Thank you sir!

Good Afternoon

Best,

Privacy Analyst, J.D., CIPP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-3300
Mobile: 202-8
Main: 202-732-3300
From: [redacted]
Sent: Thu, 7 May 2020 19:51:46 +0000
To: [redacted]
Subject: RE: GAO Questionnaire for Face Recognition Technology (103705)
Attachments: GAO_Main Questionnaire (KC 05 07 20).pdf

Best,
[redacted]

Mobile: 202-87[redacted]

From: [redacted]@ice.dhs.gov>
Sent: Tuesday, May 5, 2020 8:17 AM
To: [redacted]@ice.dhs.gov>
Subject: RE: GAO Questionnaire for Face Recognition Technology (103705)

Thanks, I think everything looks good for the most part, but happy to walk through it by phone. My schedule today is a little tough, but I think I’m free Thursday anytime 3pm onwards. If you find a time earlier (either today or tomorrow), feel free to send an invite. My calendar should be up to date.

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-[redacted]
Mobile: 202-70-[redacted]

From: [redacted]@ice.dhs.gov>
Sent: Monday, May 4, 2020 2:17 PM
To: [redacted]@ice.dhs.gov>
Subject: RE: GAO Questionnaire for Face Recognition Technology (103705)

Best,
From: ice.dhs.gov> Sent: Monday, May 4, 2020 11:15 AM
To: ice.dhs.gov>
Cc: ice.dhs.gov; ice.dhs.gov;
Subject: RE: GAO Questionnaire for Face Recognition Technology (103705)

Thanks given that, I think we can get you what you need by May 12. I'll be in touch closer to the deadline if that changes.

Do you also know which personnel in HSI received this task?

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-
Mobile: 202-7

From: ice.dhs.gov> Sent: Monday, May 4, 2020 11:07 AM
To: ice.dhs.gov>
Cc: ice.dhs.gov; ice.dhs.gov; ice.dhs.gov;
Subject: RE: GAO Questionnaire for Face Recognition Technology (103705)

Good morning

Thanks for taking my call this morning. Per our conversation, HSI already has the questionnaire and we only need IGP's perspective on the questionnaire. Given that information, do you believe IGP would need a deadline extension?

Thank you.

Management and Program Analyst
Audit Liaison Unit
Office of Assurance and Compliance, OCFO
(202) 794-2021-ICLI-00005

From: ice.dhs.gov> Sent: Monday, May 4, 2020 10:37 AM
To: ice.dhs.gov>
Subject: RE: GAO Questionnaire for Face Recognition Technology (103705)

Thanks. We’re working to also send to HSI as an Exec Sec tasker since they will be the main content provider. Is there any flexibility on the deadline?

Privacy Officer  
Office of Information Governance and Privacy  
U.S. Immigration and Customs Enforcement  
Desk: 202-732-  
Mobile: 202-7

From:  
Sent: Friday, May 1, 2020 4:42 PM  
To:  
Cc:  
Subject: GAO Questionnaire for Face Recognition Technology (103705)

Good afternoon,

We received this questionnaire from GAO regarding an ongoing audit about Face Recognition Technology. You participated in a meeting last October and provided GAO with information related to privacy concerns and assessments. The three PDFs attached are GAO’s questionnaire and two fillable forms to use for documenting photos and face recognition technology. The Word document attached is the response IGP provided to GAO in October documenting some of the systems that ICE uses.

Please let me know if you have any questions. GAO has requested responses by May 12.

Thank you and have a good weekend.

Management and Program Analyst  
Audit Liaison Unit  
Office of Assurance and Compliance, OCFO  
(202) 794-  
(cell)  
@ice.dhs.gov
Thanks. Let’s keep the PTA to only CEIU, but I’m going to pass off all this information (including our draft PTA) to OPLA for awareness.

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-1811
Mobile: 202-759-3300
Main: 202-732-3300

FYSA. Some HSI offices appear to be using the free licenses as well

Best,

Mobile: 202-876-3234

We recently became aware that agents and analysts in the field were using the tool. We sent a tasking to the field to identify all of the users and whether they have paid for licenses or are using a free trial.

I will have a better idea of how many people are using it ensuring they are following the protocols outlined in our assessment. Once I have all the get-backs I will make sure you are filled in.
Thank you!

Do you know of any other HSI offices that were using the free licenses? We are only aware of CEIU using Clearview presently.

Best,

Mobile: 202-87

Thanks everyone!

Best,

Mobile: 202-87
IF we get any additional information we will make sure to forward on.

Thanks
Find enclosed suggested responses.

Best,

[Redacted]

---

Do you want to take a shot at making some edits in regards to [Redacted] questions? I would ignore the one for now about the Clearview lawsuit and just focus on the ICE use portion.

[Redacted]

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: [Redacted]
Mobile: [Redacted]

Good morning. Like the format. Just added a few comments/questions. I don’t need to see this again after you an [Redacted] finish. Thanks.

Ph.D.
Chief Data Officer/Assistant Director
U.S. Immigration and Customs Enforcement
(202) 73[Redacted] (Office)
(202) 44[Redacted] (Cell)
Good morning (b)(7)(C)

Based on the template provided and the information that Staci is looking for, I've drafted some background language in the attached White Paper template, which is consistent with what we've written in the PIA. Let me know if you'd like to make any edits before we send to (b)(6);

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732
Mobile: 202-

Per our discussion, attached is a basic template you can use. I don't think for this purpose that you need the definition and purpose/background sections, but you can adapt as appropriate.

Thanks

I will relay the message to DHS – it shouldn’t be an issue. I’m reaching out to the Innovation Lab team to see if they’ve completed their review.

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement


From: Barrera, Staci A [b](6); (b)(7)(C) ice.dhs.gov>
Sent: Thursday, April 30, 2020 7:29 AM
To: [b](6); (b)(7)(C) ice.dhs.gov>
Cc: [b](6); (b)(7)(C) ice.dhs.gov>
Subject: RE: PIA for Clearview/Facial Recognition - IGP Bullets - 29 Apr 20

Thanks. We need this final to provide to OPA and OCR before DHS publishes the PIA on DHS website today. Was expecting a final product last night. Can we check with IGP on whether or not DHS Privacy can delay posting until this is final. HSI clearance should be the priority.

Sent with BlackBerry Work
(www.blackberry.com)

From: [b](6); (b)(7)(C) dhs.gov>
Date: Thursday, Apr 30, 2020 7:17 AM
To: Barrera, Staci A [b](6); (b)(7)(C) ice.dhs.gov>
Cc: [b](6); (b)(7)(C) ice.dhs.gov>
Subject: FW: PIA for Clearview/Facial Recognition - IGP Bullets - 29 Apr 20

Staci,

Attached are the bullets that IGP prepared per AD1s request at yesterday’s Principals Meeting regarding the PIA on Clearview/Facial Recognition.

It looks like they are still awaiting final clearance from HSI and OPA. I have asked IGP to let us know once this is fully cleared.
As requested by Staci, attached are the IGP Clearview – Facial Recognition Bullets that have been cleared by AD. Set forth below is the current activity (as of this evening) status with respect to personnel who have reviewed/cleared the PIA.

Please direct your questions to Privacy Officer

V/R

Chief of Staff
Information Governance and Privacy
HQ Immigration and Customs Enforcement
(202) 73 __Office__
(202) 42 __Cell__
Subject: PIA for Clearview/Facial Recognition
Importance: High

Before the PIA gets published for Clearview/Facial Recognition, AD1 has asked that we have talking points regarding the initiative that OPA and OCR can use for media/congressional inquiries.

I can call you as soon as I finish the meeting I am in but wanted to give you a heads up.

Thanks
Staci
I will get you what we have. Since this was a trial purchase, we have limited procurement documents, but I will gather up what we have and get them to you.

Best,

Can you provide some more details on the type of documents you are looking for?
I just wanted to check back in on this. Do you have the SOW or CONOPS or any other documents we might be able to use to assist us in our review? Is there a vendor contact we might be able to reach out to?

Best,

Mobile: 202-870-...

Thanks for the legal analysis and may come in handy for us. Do you know where I might be able to get the procurement docs for ClearView?

Best,

Mobile: 202-870-...

Please read the attached memorandum written by the former Solicitor General of the United States. I think it will answer all of your questions.
Good Morning

My apologies on the delay in getting back to you, but I wanted to check in with the ICE Privacy Officer about this. This service touches on a lot of hot button issues in privacy right now (facial recognition and social media use) and we've been getting a lot of pushback from DHS Privacy on using similar technologies and services.

Could you send us over the procurement documentation for Clearview? And any other material the vendor may have given you? We'd like to get more into detail of how the service works and any potential privacy issues that might arise. It might also be helpful to have a call/meeting to discuss the service further, just to avoid a lot of back and forth with the PTA document.

Best,

Please see the attached form with comments added. Please let us know if there is anything else we need to do to move this forward.

Thanks

Section Chief

Cyber Crimes Center (C3) | Child Exploitation Investigations Unit (CEIU) 
DHS - ICE | Homeland Security Investigations | Victim Identification Program
Cell: (503) 202-87d(b)(6); (b)(7)(C)
Any image

Sent with BlackBerry Work
(www.blackberry.com)

Best,

Mobile: 202-870...

Sent with BlackBerry Work
(www.blackberry.com)

Sent with BlackBerry Work
(www.blackberry.com)
Best,

Mobile: 202-870

From: ice.dhs.gov>
Sent: Wednesday, December 11, 2019 5:14 PM
To: ice.dhs.gov>
Subject: Updated Clearview PTA

Please find the attached updated PTA and an accuracy report you asked for.

Special Agent
Homeland Security Investigations
No updates on LPR at this time.

Thanks,
The above is what [b][8]. reported on Friday. Please email me any updates since Friday for 1:00 PM meeting.

Thanks,

(202) 739-8900 (desk)
(202) 897-6100 (Cell)
From: [redacted]
Sent: Fri, 13 Mar 2020 15:29:51 +0000
To: [redacted]
Subject: RE: Changes to your work since last Fri

See below in red

Best,
[redacted]

Mobile: 202-87[redacted]

From: [redacted]@ice.dhs.gov>
Sent: Friday, March 13, 2020 11:24 AM
To: [redacted]@ice.dhs.gov>
Subject: RE: Changes to your work since last Fri

Med War Crimes Hunter PIA

![Table]

One more.

From: [redacted]@ice.dhs.gov>
Sent: Friday, March 13, 2020 10:57 AM
To: [redacted]@ice.dhs.gov>
Subject: RE: Changes to your work since last Fri

Hi [redacted],

See below, in red.

Please edit the following for the IGP tracker to reflect changes since last Friday. Much appreciated if you could do it by Noon today. Thanks.

![Table]
<table>
<thead>
<tr>
<th>External Investigations SORN</th>
<th>Late June</th>
</tr>
</thead>
<tbody>
<tr>
<td>(b)(6); (b)(7)(C)</td>
<td></td>
</tr>
<tr>
<td>(202) 732 (desk)</td>
<td></td>
</tr>
<tr>
<td>(202) 897 (Cell)</td>
<td></td>
</tr>
<tr>
<td>(b)(5)</td>
<td></td>
</tr>
</tbody>
</table>
Thanks, these are points you can raise now with C3 or when we meet with them the week of 23 March.

Ph.D.
Assistant Director
Information Governance and Privacy
U.S. Immigration and Customs Enforcement
(202) 732-(b)(6) (Office)
(202) 440-(b)(7) (Cell)

Thanks,
Good afternoon Gentlemen,

Please see the attached document for an overview on Clearview AI.

Thank you,

[Signature]

Chief of Staff

Operational Technology and Cyber
Homeland Security Investigations, ICE

WARNING: THIS DOCUMENT IS FOR OFFICIAL USE ONLY (FOUO). It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 552). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information and is not to be released to the public or other personnel who do not have a valid "need-to-know" without prior approval of an authorized DHS official.
Thanks, I won’t be able to attend but please let me know what results from the meeting. I appreciate you organizing this.

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-7023
Mobile: 202-702-7023
Main: 202-732-3300

-----Original Appointment-----
From: dhs.gov
Sent: Monday, October 7, 2019 2:07 PM
To: OAS-Privacy-Conference-Scheduler
Subject: FW: Clearview AI Privacy Discussion

When: Monday, October 7, 2019 3:30 PM-4:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: 1-866-650-7023

Looks like you may have a meeting then, but just in case.

-----Original Appointment-----
From: dhs.gov
Sent: Monday, October 7, 2019 2:06 PM
To: OAS-Privacy-Conference-Scheduler
Subject: Clearview AI Privacy Discussion

When: Monday, October 7, 2019 3:30 PM-4:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: 1-866-650-7023

Call to discuss CEIU use of Cleaview AI and privacy implications in preparation for the GAO meeting 10/16
Sorry about the delay in getting back to you on this one again. I check with the team and they confirmed that this will not be part of the boundary So I’m sure a security boundary wouldn’t be necessary.

If you have any further questions, I’d be happy to schedule a phone call.

V/r,

CISSP, CAP

I just wanted to double back on this. Is a security boundary necessary for Clearview? Thanks again for your help.

Best,

Mobile: 202-879-
Good morning. I wanted to follow up on the voicemail I left for you yesterday. Is C3’s use of Clearview AI under a security boundary? I need to check the box for the PTA. Thanks!

Best,
Got it.

Good afternoon.
Let me know if you have any questions, and happy to touch base prior to Thursday if we can coordinate schedules. I have to head back to class soon, but feel free to text me if you need anything.

rb)(6); (b)(7)(C)

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732 (b)(6)
Mobile: 202-7 (b)(?)(C)
Main: 202-732-3300
RE: ClearView for the WAR report

Best,

Mobile: 202-877-7104

FW: ClearView for the WAR report

This is all I want to say in the WAR:

Thoughts?
From: (b)(6); (b)(7)(C)

Sent: Friday, February 14, 2020 11:47 AM

To: (b)(6); (b)(7)(C)

Subject: ClearView for the WAR report

Hey (b)(6); (b)(7)(C)

Best,

(b)(6); (b)(7)(C)
Never mind got it

On Mon, Dec 23, 2019 at 3:02 PM viewed wrote:
Can someone share the dial-in info with me?

On Mon, Dec 23, 2019 at 11:55 AM @ice.dhs.gov wrote:
I'm in.

Sent with BlackBerry Work
(www.blackberry.com)

3pm works for the privacy team. Unless from HSI have any objections I'll send a meeting invite with the call in information. Thanks!

Best,

Mobile: 202-870-1210
Subject: Re: Clearview Legal questions

Hello everyone,

Can we do a call at, let's say, 3pm? I'm happy to talk to you all then. I'm also happy to do after Jan. 6 if that works better for you.

On Mon, Dec 23, 2019 at 10:36 AM @ice.dhs.gov wrote:

Good Morning!

It looks like we are available anytime between 2:30 and 4. If that doesn’t work for you it looks like we may need to push the call until the week of Jan 6.

Thanks,

Mobile: 202-87

From: clearview.ai>
Sent: Monday, December 23, 2019 10:19 AM
To: @ice.dhs.gov>
Cc: clearview.ai>
Subject: Re: Clearview Legal questions

Hello
A call on this afternoon would be good. We can also talk sometime after Christmas. What time works best for you?

On Fri, Dec 20, 2019 at 10:30 AM Cox, l(b)(6); (b)(7)(C) c@ice.dhs.gov> wrote:

Good Morning l(b)(6); (b)(7)(C)

Thanks for your help,

Mobile: 202-870 l(b)(6); (b)(7)(C)

From: l(b)(6); (b)(7)(C) ice.dhs.gov>
Sent: Thursday, December 19, 2019 4:05 PM
To: l(b)(6); (b)(7)(C)learnview.ai> l(b)(6); learnview.ai
Cc: l(b)(6); (b)(7)(C) ice.dhs.gov>; l(b)(6); (b)(7)(C)
Sent with BlackBerry Work
(www.blackberry.com)

Date: Thursday, Dec 19, 2019, 1:04 PM

Subject: Re: Clearview Legal questions

Yes

And

On Dec 19, 2019, at 2:53 PM @ice.dhs.gov> wrote:

You want me to refer him to you?

From: @ice.dhs.gov>
Sent: Thursday, December 19, 2019 4:35 AM
To: @ice.dhs.gov>

Subject: Clearview Legal questions

Good Morning

Best,
Thanks, We’ll take a look and let you know Monday if we need any edits. -

Good afternoon -
Thank you sir!

Good Afternoon,

Best,

Privacy Analyst, J.D., CIPP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-
Mobile: 202-8
Main: 202-732-3300
RE: GAO Questionnaire for Face Recognition Technology (103705)

GAO_Main Questionnaire (KC 05 07 20).pdf

Hi,

Best,

Mobile: 202-87...

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-730...
Mobile: 202-70...

From: ice.dhs.gov
Sent: Tuesday, May 5, 2020 8:17 AM
To: ice.dhs.gov
Subject: RE: GAO Questionnaire for Face Recognition Technology (103705)

I went through the main questionnaire pretty methodically. A lot of these questions are a bit of a judgement call. I explained my judgement calls at the very end section of the document. There’s a question about amazon recognition. I think we had them run a couple photos as part of a sales pitch/industry day, but I didn’t think I should count it. Happy to talk this through over the phone with you after you review.

Best,
Thanks. Given that, I think we can get you what you need by May 12. I'll be in touch closer to the deadline if that changes.

Do you also know which personnel in HSI received this task?

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-9971
Mobile: 202-770-9000

Good morning.

Thank you.

Management and Program Analyst
Audit Liaison Unit
Office of Assurance and Compliance, OCFO
(202) 794-9971 (cell)
Good afternoon,

Thank you and have a good weekend.

Management and Program Analyst
Audit Liaison Unit
Office of Assurance and Compliance, OCFO
(202) 794-
Thanks. Let’s keep the PTA to only CEIU, but I’m going to pass off all this information (including our draft PTA) to OPLA for awareness.

FYSA. Some HSI offices appear to be using the free licenses as well.
Subject: RE: Investigation Notification: Publish SEN - (Unconfirmed) - INV-2020-02-6274307 - Potential Privacy Spill

Thanks!

Do you know of any other HSI offices that were using the free licenses? We are only aware of CEIU using Clearview presently.

Best,

Mobile: 202-8...

Subject: RE: Investigation Notification: Publish SEN - (Unconfirmed) - INV-2020-02-6274307 - Potential Privacy Spill

Thanks everyone!

Best,

Mobile: 202-8...
Thanks

Section Chief

Cyber Crimes Center (C3) | Child Exploitation Investigations Unit (CEIU)
DHS – ICE | Homeland Security Investigations | Victim Identification Program

From: [b](6); (b)(7)(C) <ice.dhs.gov>
Sent: Friday, February 28, 2020 8:36 AM
To: (b)(6); (b)(7)(C) <ice.dhs.gov> (b)(7)(C) CTR
Cc: (b)(6); (b)(7)(C) <ice.dhs.gov>
Subject: RE: Investigation Notification: Publish SEN - (Unconfirmed) - INV-2020-02-6274307 - Potential Privacy Spill

[b](6); (b)(7)(C)

[b](5)

From: (b)(6); (b)(7)(C) <ice.dhs.gov>
Sent: Friday, February 28, 2020 5:29 AM
To: (b)(6); (b)(7)(C) <ice.dhs.gov> (b)(7)(C) CTR
Cc: (b)(6); (b)(7)(C) <ice.dhs.gov>
Subject: RE: Investigation Notification: Publish SEN - (Unconfirmed) - INV-2020-02-6274307 - Potential Privacy Spill
Find enclosed suggested responses.

Best,

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732
Mobile: 202-7

Good morning. Like the format. Just added a few comments/questions. I don’t need to see this again after you and finish. Thanks.

Chief Data Officer/Assistant Director
U.S. Immigration and Customs Enforcement
(202) 732 (Office)
(202) 440 (Cell)
Good morning,

Based on the template provided and the information that the sender is looking for, I've drafted some background language in the attached White Paper template, which is consistent with what we've written in the PIA. Let me know if you'd like to make any edits before we send to the Privacy Officer.

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-...
Mobile: 202-7...

Per our discussion, attached is a basic template you can use. I don't think for this purpose that you need the definition and purpose/background sections, but you can adapt as appropriate.

Thanks,

I will relay the message to DHS – it shouldn’t be an issue. I’m reaching out to the Innovation Lab team to see if they’ve completed their review.

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
See below from Staci. Can we see if DHS Privacy can delay posting the PIA until the bullets are final?

Thanks,

From: Barrera, Staci A <barrera_staci@dhs.gov>
Sent: Thursday, April 30, 2020 7:29 AM
To: Barrera, Staci A <barrera_staci@dhs.gov>
Cc: 

Subject: RE: PIA for Clearview/Facial Recognition - IGP Bullets - 29 Apr 20

Thanks. We need this final to provide to OPA and OCR before DHS publishes the PIA on DHS website today. Was expecting a final product last night. Can we check with IGP on whether or not DHS Privacy can delay posting until this is final. HSI clearance should be the priority.

Sent with BlackBerry Work
(www.blackberry.com)

From: Barrera, Staci A <barrera_staci@dhs.gov>
Sent: Thursday, April 30, 2020 7:17 AM
To: Barrera, Staci A <barrera_staci@dhs.gov>
Cc: 

Subject: FW: PIA for Clearview/Facial Recognition - IGP Bullets - 29 Apr 20

Staci,

Attached are the bullets that IGP prepared per AD1s request at yesterday’s Principals Meeting regarding the PIA on Clearview/Facial Recognition.

It looks like they are still awaiting final clearance from HSI and OPA. I have asked IGP to let us know once this is fully cleared.
From: Sharon
Sent: Wednesday, April 29, 2020 8:37 PM
To: #MASTAFF
Cc: Information Governance and Privacy

Subject: PIA for Clearview/Facial Recognition - IGP Bullets - 29 Apr 20

Please direct your questions to Privacy Officer.

V/R

Chief of Staff
Information Governance and Privacy
HQ Immigration and Customs Enforcement
(202) 732-Office
(202) 424-Cell

From: Sharon
Sent: Wednesday, April 29, 2020 8:37 PM
To: ice.dhs.gov
Cc: Aguilar, Max
dhs.gov; h@ice.dhs.gov

Subject: PIA for Clearview/Facial Recognition
Importance: High

Before the PIA gets published for Clearview/Facial Recognition, AD1 has asked that we have talking points regarding the initiative that OPA and OCR can use for media/congressional inquiries.

I can call you as soon as I finish the meeting I am in but wanted to give you a heads up.

Thanks
Staci
I will get you what we have. Since this was a trial Peard purchase, we have limited procurement documents, but I will gather up what we have and get them to you.

Hi,

Anything that discusses C3s proposed uses of the technology in its workflow, any deliverables it expects from the vendor, and anything the vendor may have promised in regards to safeguards. Also any vendor briefing documents or any other documents where they are selling the product that would give us a perspective on how they operate.

Best,

Can you provide some more details on the type of documents you are looking for?
Good Morning

I just wanted to check back in on this. Do you have the SOW or CONOPS or any other documents we might be able to use to assist us in our review? Is there a vendor contact we might be able to reach out to?

Best,

Mobile: 202-871-7795

Thanks for this.

It’s a very good legal analysis and may come in handy for us. Do you know where I might be able to get the procurement docs for ClearView?

Best,

Mobile: 202-871-7795

Please read the attached memorandum written by former Solicitor General of the United States. I think it will answer all of your questions.
From: ice.dhs.gov
Sent: Wednesday, September 4, 2019 10:07 AM
To: ice.dhs.gov
Cc: ice.dhs.gov
Subject: RE: PTA ICE- Clearview (KC 6.27.19)

Good Morning

Best,

Mobile: 202-871

From: ice.dhs.gov
Sent: Wednesday, August 21, 2019 3:28 PM
To: ice.dhs.gov
Cc: ice.dhs.gov
Subject: PTA ICE- Clearview (KC 6.27.19)

Please see the attached form with comments added. Please let us know if there is anything else we need to do to move this forward.

Thanks

Section Chief

Cyber Crimes Center (C3) | Child Exploitation Investigations Unit (CEIU)
DHS-ICE | Homeland Security Investigations | Victim Identification Program
Cell: (503)
From:
Sent: Thu, 12 Dec 2019 20:14:49 +0000
To: RE: Updated Clearview PTA
Subject: RE: Updated Clearview PTA

Any image

Sent with BlackBerry Work (www.blackberry.com)

From: ICE@ice.dhs.gov
Date: Thursday, Dec 12, 2019, 12:03 PM
To: ICE@ice.dhs.gov
Subject: RE: Updated Clearview PTA

Best,

Mobile: 202-87

Sent with BlackBerry Work (www.blackberry.com)

From: ICE@ice.dhs.gov
Sent: Thursday, December 12, 2019 3:00 PM
To: ICE@ice.dhs.gov
Subject: RE: Updated Clearview PTA

Sent with BlackBerry Work (www.blackberry.com)

From: ICE@ice.dhs.gov
Date: Thursday, Dec 12, 2019, 11:47 AM
To: ICE@ice.dhs.gov
Subject: RE: Updated Clearview PTA
Best,

Mobile: 202-870-....

From: [redacted]

Sent: Wednesday, December 11, 2019 5:14 PM

To: [redacted]

Subject: Updated Clearview PTA

Please find the attached updated PTA and an accuracy report you asked for.

Special Agent
Homeland Security Investigations
Thanks, these are points you can raise now with C3 or when we meet with them the week of 23 March.

Ph.D.
Assistant Director
Information Governance and Privacy
U.S. Immigration and Customs Enforcement
(202) 732- (Office)
(202) 440- (Cell)

I'm copying my team on this.
Good afternoon Gentlemen,

Please see the attached document for an overview on Clearview AI.

Thank you,

Chief of Staff

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Thanks, I won’t be able to attend but please let me know what results from the meeting. I appreciate you organizing this.

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-1000
Mobile: 202-782-3060
Main: 202-732-3300

Looks like you may have a meeting then, but just in case.
Hey,

Sorry about the delay in getting back to you on this one again. I check with the team and they confirmed that this will not be part of the boundary of C3 GSS. So I’m sure a security boundary wouldn’t be necessary.

If you have any further questions, I’d be happy to schedule a phone call.

V/r,

CISSP, CAP

ISSE | SteamPunk, Inc.
Information Assurance Division (IAD)
Office of the Chief Information Officer (OCIO)
Supporting Homeland Security Investigations (HSI)
Immigration and Customs Enforcement (ICE)
Department of Homeland Security (DHS)
Cell: (703) 407-

I just wanted to double back on this. Is a security boundary necessary for Clearview? Thanks again for your help.

Best,

Mobile: 202-870-

I just wanted to double back on this. Is a security boundary necessary for Clearview? Thanks again for your help.

Best,
No worries on the delay submitted the PTA. I’ve discussed with her, and she’s unsure of the security boundary as well. Clearview is a vendor owned web-portal, but I don’t know if that matters. Thanks for tracking it down for me!

Best,

CISSP, CAP

From: [Redacted]
Sent: Thursday, October 10, 2019 8:28 AM
To: [Redacted]
Subject: RE: Clearview AI security boundary

Good morning,

V/r,

CISSP, CAP

From: [Redacted]
Sent: Thursday, October 10, 2019 8:07 AM
To: [Redacted]
Subject: Clearview AI security boundary

Good Morning,

I wanted to follow up on the voicemail I left for you yesterday. Is C3’s use of Clearview AI under a security boundary? I need to check the box for the PTA. Thanks!

Best,
b)(6), b)(7)(C)
Privacy Analyst, J.D., CIPP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-[~li~lcc)
Mobile: 202-8?
Main: 202-732-3300
Good afternoon,

Thanks for letting me know about the Clearview conference call this coming Thursday. While I won’t be able to attend, I wanted to convey a few points that I’d like you to bring up:

[Text content]

From: 
Sent: Tuesday, March 10, 2020 1:40 PM 
To: 
Subject: RE: Clearview Call
[b](5)

[b](8), [b](7)(C)

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732- [b](8)
Mobile: 202-7 [b](7)(C)
Main: 202-732-3300
Thanks. See you tomorrow.

Section Chief
Cyber Crimes Center (C3) | Child Exploitation Investigations Unit (CEIU)
DHS - ICE | Homeland Security Investigations | Victim Identification Program
Cell: (503) 209-6655
ice.dhs.gov

Yes they do! I'll try to get something set up.

Best
Mobile: 202-870-

I think we are planning on doing it on teams. Does everyone have access?

Section Chief
Cyber Crimes Center (C3) | Child Exploitation Investigations Unit (CEIU)
DHS - ICE | Homeland Security Investigations | Victim Identification Program
Cell: (503) 209-6655
ice.dhs.gov

Hi
Do you have the details for the call in on the demo? I can put it into the meeting invite for tomorrow.

Thanks again!
Privacy Analyst, J.D., CIPP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732 (b)(6)
Mobile: 202-8 (b)(7)(C)
Main: 202-732-3300
Subject: Daily podcast ClearView

I just checked and saw that you were the POC for the ClearView PTA. I don't know if you’ve seen this already, but NY Times podcast The Daily did an episode yesterday on ClearView. I recommend a listen, it’s very privacy focused.

Best,

[redacted]

---

From: [redacted]
Sent: Tue, 11 Feb 2020 17:51:25 -0500
To: [redacted]
Subject: Daily podcast ClearView

I just checked and saw that you were the POC for the ClearView PTA. I don't know if you’ve seen this already, but NY Times podcast The Daily did an episode yesterday on ClearView. I recommend a listen, it’s very privacy focused.

Best,

[redacted]
Thanks! I'll review these first thing next week.

Best,

Mobile: 202-870-

I reached out to Clearview and they already have some of the documents that you asked me about. See attached.

Attached:

* Code of Conduct
* Search tips (please give feedback, in progress)

Thanks
Thanks, I think it's ready to go back up.

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-4
Mobile: 202-701
Main: 202-732-3300

Find enclosed the External Investigations SORN with response to comment on BITMAP and the inclusion of victim biometrics like we discussed (to cover Clearview and potentially NCVIS).

Best,

Mobile: 202-870

Can you take a look at comments and we can try to get it back to them next week?

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732-4
Mobile: 202-701
Main: 202-732-3300.
From: [redacted]
Sent: Wednesday, November 13, 2019 1:50 PM
To: [redacted]
Cc: PIA <PIA@HQ.DHS.GOV>
Subject: External Investigations SORN

Please find attached the External Investigations SORN with feedback from [redacted]. She had some light edits and one question about routine uses and BITMAP. If it is possible to turn this around quickly then I will be able to get it to Jonathan tomorrow.

Respectfully,

[redacted]

Privacy Analyst
DHS Privacy Office
Desk: (202) 34
Cell: (202) 503
Email: [redacted]
Subject: Clearview Question

Hi

Privacy Officer
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
Desk: 202-732
Mobile: 202-7
Main: 202-732-3300
Hey,

Do you mind if I check in with CBP and see if they are doing anything with Clearview?

Best,

Mobile: 202-879-7474

From:
Sent: Wednesday, September 25, 2019 3:30 PM
To: dhs.gov
Subject: RE: Clearview software

Hey,

Do we already have an adjudicated PTA on this? I remember reviewing one a little while back.

Also, how did today's training go?

Sent with BlackBerry Work
(www.blackberry.com)
You guys use this?

Looks creepy as hell. Scans social media and open source pictures to find subjects.
Can you let me know if my bullet about Clearview in the attached document is accurate? Feel free to edit accordingly.

Privacy Officer  
Office of Information Governance and Privacy  
U.S. Immigration and Customs Enforcement  
Desk: 202-732-4714  
Mobile: 202-732-7777  
Main: 202-732-3300
Sorry for the mass of emails but this was a linked article. The client list was leaked to buzzfeed and ICE is mentioned in the headline.


FYSA

Privacy Analyst, J.D., CIPP/US/G
Office of Information Governance and Privacy
U.S. Immigration and Customs Enforcement
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That would be great. Also, do you have a list of POCs who can appropriately discuss the use of facial recognition technologies? I’m going to forward the invite as needed. Ideally HSI personnel, but if there’s anyone in OPLA they’ve been working with that would also help.

Can do. Deadline Oct 4? That way you can review it and I’ll have enough time to run down any questions of yours prior to the call.

Best,
On October 16, I have a call with GAO about ICE's use of facial recognition technologies. Could you put together a 1-2 page summary of the various tools that HSI uses that entail facial recognition? Please call or email me tomorrow if you have questions. I'm assuming this will cover things like War Crimes Hunter, GOST, possibly Clearview (to the extent it's actually being used), etc.
Good Morning

Find enclosed the Facial Recognition Report, with updates to include CART and additional details on Clearview AI.

Best,

Mobile: 202-87

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Thanks very much for the write-up. Could you make a few small changes and re-send to me by 3pm tomorrow?

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Privacy Officer
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U.S. Immigration and Customs Enforcement
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Hey

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Best,

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of the Freedom of Information and Privacy Act
Withheld pursuant to exemption
(b)(5); WIF Draft
of the Freedom of Information and Privacy Act
Withheld pursuant to exemption (b)(5); WIF Draft of the Freedom of Information and Privacy Act
Responses enclosed!

Best,
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As promised, the FR PIA. Some language about the approval process for an FRS may change. Let me know if you have any questions.
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