Dear James C. Smith

We are writing to express concerns and seek urgent clarifications regarding your companies’ contractual relationships with United States immigration authorities.

As you will be aware, the US government’s “zero tolerance” immigration policy has recently received widespread and international condemnation. In the past 2 months, over 2000 children have been forcibly separated from their parents. The American Academy of Pediatrics has said\(^1\) that such “sweeping cruelty” causes “irreparable harm” which can “carry lifelong consequences for children”; the United Nations High Commissioner for Human Rights has called the policy “unconscionable.”\(^2\)

In addition to the policy’s clear moral failure, it is also in violation of the US’s international commitments. The US is a signatory to the International Covenant on Civil and Political Rights, which protects families from unnecessary interference by the government. Separating families at the US border is cruel, arbitrary, disproportionate, and a clear contravention of the Article 17 rights of thousands of children and parents.

President Trump’s Executive Order signed on 20 June 2018 will not end the “zero tolerance” approach; indeed, it remains unclear if families will continue to be separated or whether those already separated will be reunited, and it still foresees that families will be detained in detention centres indefinitely, including in military facilities.\(^3\)

We are concerned that a number of the products and services sold by Thomson Reuters Corporation are being used by US immigration enforcement authorities. Federal procurement documents show that US Immigration and Customs Enforcement (ICE) has contracts\(^4\):

With Thomson Reuters Special Services for a contract worth over $6.7 million in February 2018 to provide its Detention Compliance and Removal office with “subscription data services” (attached). Other documentation shows\(^5\) that the contract is for a “continuous monitoring and alert system to track 500,000 identities per month” which is “able to securely process and return aliens’ information and addresses using the following types of specified data: FBI numbers; State Identification Numbers; real time jail booking data; credit history; insurance claims; phone number account information; wireless phone accounts; wire transfer data; driver’s license information; vehicle registration information; property information; pay day loan information; public court records; incarceration data; employment address data; Individual Taxpayer Identification Number (ITIN) data; and employer records.”

With West Publishing Corporation, a Thomson Reuters subsidiary, providing it with access to the Consolidated Lead Evaluation and Reporting (CLEAR) system as part of a contract value worth over $20 million (attached). The CLEAR system allows ICE access\(^6\) to a “vast collection of public and proprietary records” including phone records, consumer and credit bureau data, healthcare provider content, utilities data, DMV records, World-Check listing, business data, data from social networks and chatrooms, and “live access to more than 7 billion license plate detections”\(^7\).

With West Publishing Corporation providing its Detention Compliance and Removal office with “access to license plate reader database” as part of a contract value worth over $6 million in December 2017 (attached).

We are concerned about the provision of these services and products to an agency enforcing cruel, arbitrary, and disproportionate measures in violation of the US’ international commitments.

We are writing therefore to ask:

- Whether any of the company’s or company subsidiaries’ products or services are being or have been used by US authorities to identify families for immigration enforcement purposes, including parents potentially separated from their children
- What human rights impact assessments of the company’s or company subsidiaries’ products or services have been completed, if any
- Whether Thomson Reuters Corporation will commit to not providing products or services to US immigration agencies which may be used to enforce such cruel, arbitrary, and disproportionate measures
- Whether Thomson Reuters Corporation will commit to not providing products or services to agencies worldwide which may be used to enforce cruel, arbitrary, and disproportionate measures

Thomson Reuters Corporation through its public commitment to corporate responsibility and inclusion, and foundation have shown a commitment to do business in ways that respect, protect, and benefit its customers, employees, communities, suppliers and environment. We therefore look forward to your quick response.

Yours sincerely

Edin Omanovic
Privacy International

\(^5\) https://www.fbo.gov/index?s=opportunity&mode=form&id=71911de5fa638ed0a39101f520c0e2a&tab=core\&_cview=1


\(^7\) https://legalsolutions.thomsonreuters.com/law-products/solutions/clear-investigation-software/law-enforcement
Transaction Information

Award Type: Delivery/Task Order  Prepared Date: 01/19/2017 09:27:27  Prepared User: TRACY.RILEY@ICE.DHS.GOV
Award Status: Final  Last Modified Date: 01/19/2017 09:36:50  Last Modified User: TRACY.RILEY@ICE.DHS.GOV
Closed Status: No  Closed Status Date: 

Document Information

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<th>Modification No</th>
<th>Trans No</th>
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Treasury Account Symbol: 70 0540 

Dates

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<td>Fee Paid for Use of IDV</td>
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Purchaser Information

Contracting Office Agency ID: 7012  Contracting Office Agency Name: U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT
Contracting Office ID: 70CMSD  Contracting Office Name: MISSION SUPPORT DALLAS
Funding Agency ID: 7012  Funding Agency Name: U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT
Funding Office ID: 70CDV5  Funding Office Name: HOMELAND SECURITY INVEST - HQ DIV 5
Foreign Funding: Not Applicable

Contractor Information

SAM Exception: 

DUNS No: 148508286  Vendor Name: WEST PUBLISHING CORPORATION
DBAN: 610 OPPERMAN DR  Street: SAINT PAUL
City: MN  Zip: 551231340
Country: UNITED STATES  Phone: (651) 244-3819
Fax No: (800) 704-9378  Congressional District: MINNESOTA 02

Business Category

Organization Type: CORPORATE NOT TAX EXE  Business Types

Number of Employees: 6085  Line Of Business

State of Incorporation: MN  Relationship With Federal Government

Country of Incorporation: USA  All Awards

Annual Revenue: $3,332,000,000  For Profit Organization

Contract Data

Type of Contract: Firm Fixed Price  Inherently Governmental Functions:

Multiyear Contract: 

Major Program: 

National Interest Action: None

Cost Or Pricing Data: 

Purchase Card Used As Payment Method: 

Undefinitized Action: 

Performance Based Service Acquisition: 

* FY 2004 and prior; 80% or more specified as performance requirement

* FY 2005 and later; 50% or more specified as performance requirement

Contingency Humanitarian Peacekeeping Operation: Not Applicable
Contract Financing: Select One
Cost Accounting Standards Clause: Select One
Consolidated Contract: No
Number Of Actions: 1

Legislative Mandates
Clinger-Cohen Act: Not Applicable
Service Contract Act: Not Applicable
Walsh-Healey Act: Not Applicable
Davis Bacon Act: Not Applicable
Interagency Contracting Authority: Not Applicable
Other Interagency Contracting Statutory Authority: (1000 characters)

Principal Place of Performance
Principal Place Of Performance Code: MD
Principal Place Of Performance County Name: MONTGOMERY
Principal Place Of Performance City Name: ROCKVILLE
Congressional District Place Of Performance: 08
Place Of Performance Zip Code(+4): 20850 - 1728

Product Or Service Information
Product/Service Code: D317
Description: IT AND TELECOM- WEB-BASED SUBSCRIPTION
Principal NAICS Code: 519130
Description: INTERNET PUBLISHING AND BROADCASTING AND WEB SEARCH
Bundled Contract: Not a Bundled Requirement
DOD Acquisition Program: Select One
Country of Product or Service Origin: USA UNITED STATES
Place of Manufacture: U.S. Owned Business
Domestic or Foreign Entity: Not a manufactured end product
Recovered Materials/Sustainability: OMB Policy on Sustainable Acquisition
InfoTech Commercial Item Category: Select One
Claimant Program Code: Select One
Sea Transportation: Not Required
GFP Provided Under This Action: Transaction does not use GFP
Use Of EPA Designated Products: Not Required
Description Of Requirement: IGF::CT::IGF CONSOLIDATED LEAD EVALUATION AND REPORTING (CLEAR) SYSTEM ACCESS/SUBSCRIPTION

Competition Information
Extent Competed For Referenced IDV: Full and Open Competition
Extent Competed: Full and Open Competition
Solicitation Procedures: Subject to Multiple Award Fair Opportunity
Type Of Set Aside: No set aside used.
Evaluated Preference: No Preference used
SBIR/STTR: Select One
Fair Opportunity/Limited Sources: Only One Source - Other
Other Than Full And Open Competition: Select One
Local Area Set Aside: No
FedBizOpps: Select One
A76 Action: Select One
Commercial Item Acquisition Procedures: Commercial Item
Number Of Offers Received: 1
Small Business Competitiveness Demonstration Program: Commercial Item Test Program: Preference Programs / Other Data
Contracting Officer's Business Size Selection: Other than Small Business
Subcontract Plan: Select One
Price Evaluation Percent Difference: %
**Transaction Information**

- **Award Type:** Purchase Order
- **Prepared Date:** 02/14/2018 11:46:44
- **Prepared User:** MICHELLE.BRITTON@ICE.DHS.GOV
- **Award Status:** Final
- **Last Modified Date:** 02/28/2018 12:06:09
- **Last Modified User:** BENJAMIN.SHIH@ICE.DHS.GOV
- **Closed Status:** No
- **Closed Status Date:**
- **Closed By:**

**Document Information**

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- **Procurement Identifier:** 70CDCR18P00000048
- **Modification No:** 0
- **Trans No:** 0
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- **Procurement Identifier:**
- **Modification No:**
- **Trans No:**

**Date Signed (mm/dd/yyyy):** 02/27/2018

**Effective Date (mm/dd/yyyy):** 02/27/2018

**Completion Date (mm/dd/yyyy):** 02/28/2019

**Est. Ultimate Completion Date (mm/dd/yyyy):** 02/28/2023

**Solicitation Date (mm/dd/yyyy):**

**Dates**

**Amounts**

- **Action Obligation:** $1,279,008.00
- **Base And Exercised Options Value:** $1,279,008.00
- **Base and All Options Value (Total Contract Value):** $6,790,488.00
- **Fee Paid for Use of IDV:** $0.00

**Contracting Office Information**

- **Agency:** U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT
- **Procurement Identifier:**
- **Modification No:**
- **Trans No:**

**Funding Agency Information**

- **Agency:** U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT
- **Procurement Identifier:**
- **Modification No:**
- **Trans No:**

**Contractor Information**

- **Vendor Name:** THOMSON REUTERS SPECIAL SERVICES LLC
- **DBAN:**
- **Cage Code:** SBDA7
- **Street:** 1410 SPRING HILL ROAD
- **City:** MCLEAN
- **State:** VA
- **Zip:** 221023058
- **Country:** UNITED STATES
- **Phone:** (571) 405-3202
- **Fax No:** (703) 219-2500
- **Congressional District:** VIRGINIA 11

**Business Category**

- **Organization Type:** OTHER
- **Number of Employees:** 8000
- **State of Incorporation:** VA
- **Country of Incorporation:** USA
- **Annual Revenue:** $300,000,000

**Type of Contract:** Firm Fixed Price

**Inherently Governmental Functions:** Other Functions

**Multiyear Contract:**

**Major Program:**

**National Interest Action:**

**Cost Or Pricing Data:**

**Purchase Card Used As Payment Method:**

**Undefinitized Action:**

**Relationship With Federal Government**

- All Awards
- For Profit Organization
- Limited Liability Corporation

**Performance Based Service Acquisition:**
Contingency Humanitarian Peacekeeping Operation: Not Applicable

Contract Financing: Select One

Cost Accounting Standards Clause: Select One

Consolidated Contract: Not Consolidated

Number Of Actions: 1

Legislative Mandates

Clinger-Cohen Act: Not Applicable

Labor Standards: Not Applicable

Materials, Supplies, Articles, and Equipment: Not Applicable

Construction Wage Rate Requirements: Select One

Additional Reporting: None of the Above

Interagency Contracting Authority: Not Applicable

Other Interagency Contracting Statutory Authority: (1000 characters)

Principal Place of Performance

Principal Place Of Performance Code: VA

Principal Place Of Performance County Name: FAIRFAX

Principal Place Of Performance City Name: MCLEAN

Congressional District Place Of Performance: 11

Place Of Performance Zip Code(+4): 22102 - 3058

Product Or Service Information

Product/Service Code: R611

Description: SUPPORT- ADMINISTRATIVE: CREDIT REPORTING

Principal NAICS Code: 541511

Description: CUSTOM COMPUTER PROGRAMMING SERVICES

Bundled Contract: Not Bundled

DOD Acquisition Program: Select One

Country of Product or Service Origin: USA UNITED STATES

Place of Manufacture: Not a manufactured end product

Domestic or Foreign Entity: U.S. Owned Business

Recovered Materials/Sustainability: No Clauses Included and No Sustainability Included

InfoTech Commercial Item Category: Select One

Claimant Program Code: Select One

Sea Transportation: Select One

GFP Provided Under This Action: Transaction does not use GFP

Use Of EPA Designated Products: Not Required

Description Of Requirement: (4000 characters)

IGF:ct:IGF

SUBSCRIPTION DATA SERVICES

Competition Information

Extent Competed For Referenced IDV: Not Competed

Extent Competed: Not Competed

Solicitation Procedures: Only One Source

IDV Type Of Set Aside: No set aside used

Type Of Set Aside: This Action

Type Of Set Aside Source: This Action

Evaluated Preference: No Preference used

SBIR/STTR: Select One

Fair Opportunity/Limited Sources: Select One

Other Than Full And Open Competition: Only One Source-Other (FAR 6.302-1 other)

Local Area Set Aside: No

FedBizOpps: No

A76 Action: No

Commercial Item Acquisition Procedures: Commercial Item

IDV Number of Offers:
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<tr>
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<tbody>
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<td>Simplified Procedures for Certain Commercial Items:</td>
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<tr>
<td>Preference Programs / Other Data</td>
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<tr>
<td>Contracting Officer's Business Size Selection:</td>
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<td>Subcontract Plan:</td>
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Performance Based Service Acquisition:
* FY 2004 and prior: 85% or more specified as performance requirement
* FY 2005 and later: 50% or more specified as performance requirement

Contingency Humanitarian Peacekeeping Operation:
Not Applicable

Contract Financing:
Select One

Cost Accounting Standards Clause:
Select One

Consolidated Contract:
Not Consolidated

Number Of Actions:
1

Legislative Mandates
Clinger-Cohen Act:
Not Applicable

Labor Standards:
Not Applicable

Materials, Supplies, Articles, and Equip:
Not Applicable

Construction Wage Rate Requirements:
Not Applicable

Additional Reporting:
Select One or More Options
Service Contract Inventory
None of the Above

Interagency Contracting Authority:
Not Applicable

Other Interagency Contracting Statutory Authority:
(1000 characters)

Principal Place Of Performance
Principal Place Of Performance Code:
DC USA

Principal Place Of Performance County Name:
DISTRICT OF COLUMBIA

Principal Place Of Performance City Name:
WASHINGTON

Congressional District Place Of Performance:
00

Place Of Performance Zip Code(+4):
20024 6121 USPS ZIP Codes

Product Or Service Information
Product/Service Code:
D317
Description: IT AND TELECOM- WEB-BASED SUBSCRIPTION

Principal NAICS Code:
519190
Description: ALL OTHER INFORMATION SERVICES

Bundled Contract:
Not Bundled

DOD Acquisition Program:
USA UNITED STATES

Country of Product or Service Origin:
Not a manufactured end product

Place of Manufacture:
Foreign-Owned Business Incorporated in the U.S.

Domestic or Foreign Entity:
Not Applicable

Recovered Materials/Sustainability:
No Clauses Included and No Sustainability Included

InfoTech Commercial Item Category:
Select One

Claimant Program Code:
Description:

Sea Transportation:
Not Required

GFP Provided Under This Action:
Transaction does not use GFP

Use Of EPA Designated Products:
Not Required

Description Of Requirement:
IGF::CL::IGF ACCESS TO LICENSE PLATE READER DATABASE

Competition Information
Extent Competed For Referenced IDV:
Not Competed under SAP

Extent Competed:
Simplified Acquisition

Solicitation Procedures:

IDV Type Of Set Aside:
No set aside used.

Type Of Set Aside:
This Action

Type Of Set Aside Source:
Select One

Evaluated Preference:
No Preference used

SBIR/STTR:
Select One

Fair Opportunity/Limited Sources:
SAP Non-Competition (FAR 13)

Other Than Full And Open Competition:
No

Local Area Set Aside:
FedBizOpps:

A76 Action:
No

Commercial Item Acquisition Procedures:
Commercial Item

IDV Number Of Offers:

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**Preference Programs / Other Data**

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<td><strong>Price Evaluation Percent Difference:</strong></td>
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