

PRIVACY INTERNATIONAL

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James C. Smith
President and Chief Executive Officer
Thomson Reuters Corporation
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New York, NY 10036
USA

Cc by email: david.crundwell@thomsonreuters.com; david.girardin@thomsonreuters.com

21 June 2018

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 said¹ 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 contracts⁴:

¹ <https://www.aap.org/en-us/about-the-aap/aap-press-room/Pages/StatementOpposingSeparationofChildrenandParents.aspx>

² <https://news.un.org/en/story/2018/06/1012382>

³ <https://www.nytimes.com/2018/06/20/us/politics/family-separation-executive-order.html?hp&action=click&pgtype=Homepage&clickSource=story-heading&module=b-lede-package-region®ion=top-news&WT.nav=top-news>

⁴ <https://annual-report.thomsonreuters.com/downloads/annual-report-2017-thomson-reuters.pdf>

- 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 shows⁵ 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 access⁶ 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=71911de5fa638ed0a391f01f520c0e2a&tab=core&_cvview=1

⁶ <https://www.thomsonreuters.com/content/dam/openweb/documents/pdf/legal/fact-sheet/clear-brochure.pdf>

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:** **Closed By:**

Document Information

	Agency	Procurement Identifier	Modification No	Trans No					
Award ID:	7012	HSCEMD17F00008	0	0					
Referenced IDV ID:	473	GS02F026DA	0						
Reason For Modification:									
Solicitation ID:									
Treasury Account Symbol:	<table border="0"> <tr> <td>Agency Identifier</td> <td>Main Account</td> <td>Sub Account</td> </tr> <tr> <td>70</td> <td>0540</td> <td></td> </tr> </table>	Agency Identifier	Main Account	Sub Account	70	0540		Initiative (Select One)	
Agency Identifier	Main Account	Sub Account							
70	0540								

Dates

Date Signed (mm/dd/yyyy) : 01/19/2017
Effective Date (mm/dd/yyyy) : 01/19/2017
Completion Date (mm/dd/yyyy) : 03/31/2021
Est. Ultimate Completion Date (mm/dd/yyyy) : 03/31/2021

Amounts

Action Obligation: \$2,395,146.85
Base And Exercised Options Value: \$5,246,890.68
Base and All Options Value (Total Contract Value): \$20,486,416.32
Fee Paid for Use of IDV: \$0.00

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	Street: 610 OPPERMAN DR
Vendor Name: WEST PUBLISHING CORPORATION	Street2:
DBAN:	City: SAINT PAUL
	State: 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
Number of Employees: 6085
State of Incorporation: MN
Country of Incorporation: USA
Annual Revenue: \$3,332,000,000

Business Types

- Corporate Entity, Not Tax Exempt
- Line Of Business**
- Manufacturer of Goods
- Relationship With Federal Government**
- All Awards
- Organization Factors**
- For Profit Organization

Contract Data

Type of Contract: Firm-Fixed Price
Inherently Governmental Functions: CT
Multiyear Contract: (Select One)
Major Program:
National Interest Action: None
Cost Or Pricing Data: (Select One)
Purchase Card Used As Payment Method: No
Undefinitized Action: No
Performance Based Service Acquisition: (No - Service where PBA is not used.)
** 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:

Contract Financing:

Cost Accounting Standards Clause:

Consolidated Contract:

Number Of Actions:

Legislative Mandates

Clinger-Cohen Act:

Service Contract Act:

Walsh-Healey Act:

Davis Bacon Act:

Interagency Contracting Authority:

Other Interagency Contracting Statutory Authority:
(1000 characters)

Principal Place of Performance

Principal Place Of Performance Code:

Principal Place Of Performance County Name:

Principal Place Of Performance City Name:

Congressional District Place Of Performance:

Place Of Performance Zip Code(+4): -

Product Or Service Information

Product/Service Code: Description:

Principal NAICS Code: Description:

Bundled Contract:

DOD Acquisition Program: Description:

Country of Product or Service Origin: UNITED STATES

Place of Manufacture:

Domestic or Foreign Entity:

Recovered Materials/Sustainability: OMB Policy on Sustainable Acquisition

InfoTech Commercial Item Category:

Claimant Program Code: Description:

Sea Transportation:

GFP Provided Under This Action:

Use Of EPA Designated Products:

Description Of Requirement:
(4000 characters)

IGF::CT::IGF CONSOLIDATED LEAD EVALUATION AND REPORTING (CLEAR) SYSTEM ACCESS/SUBSCRIPTION

Competition Information

Extent Competed For Referenced IDV:

Extent Competed:

Solicitation Procedures:

Type Of Set Aside:

Evaluated Preference:

SBIR/STTR:

Fair Opportunity/Limited Sources:

Other Than Full And Open Competition:

Local Area Set Aside:

FedBizOpps:

A76 Action:

Commercial Item Acquisition Procedures:

Number Of Offers Received:

Small Business Competitiveness Demonstration Program:

Commercial Item Test Program:

Preference Programs / Other Data

Contracting Officer's Business Size Selection:

Subcontract Plan:

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

	Agency	Procurement Identifier	Modification No	Trans No
Award ID:	7012	70CDCR18P00000048	0	0
Referenced IDV ID:				
Reason For Modification:				
Solicitation ID:				
Treasury Account Symbol:	Agency Identifier: 70 Main Account: 0540 Sub Account:		Initiative: <input type="text" value="Select One"/>	

Dates

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) :

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

Purchaser Information

Contracting Office Agency ID: 7012	Contracting Office Agency Name: U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT
Contracting Office ID: 70CDCR	Contracting Office Name: DETENTION COMPLIANCE AND REMOVALS
Funding Agency ID: 7012	Funding Agency Name: U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT
Funding Office ID: 70CCED	Funding Office Name: ENFORCMNTREMOVL OPNS HQ COMPLIANCE
Foreign Funding: <input type="text" value="Not Applicable"/>	

Contractor Information

SAM Exception:

DUNS No: 827821757	Street: 1410 SPRING HILL ROAD
Vendor Name: THOMSON REUTERS SPECIAL SERVICES LLC	Street2:
DBAN:	City: MCLEAN
Cage Code: 5BDA7	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

Relationship With Federal Government

- All Awards
- Organization Factors
- For Profit Organization
- Limited Liability Corporation

Contract Data

Type of Contract:
Inherently Governmental Functions:
Multiyear Contract:
Major Program:
National Interest Action:
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:

No - Service where PBA is not used.

Contract Financing:

Not Applicable

Cost Accounting Standards Clause:

Select One

Consolidated Contract:

Select One

Number Of Actions:

Not Consolidated

1

Legislative Mandates

Principal Place of Performance

Clinger-Cohen Act:

No

Principal Place Of Performance Code:

State Location Country

Labor Standards:

No

VA USA

Materials, Supplies, Articles, and Equip:

Not Applicable

Principal Place Of Performance County Name:

FAIRFAX

Construction Wage Rate Requirements:

No

Principal Place Of Performance City Name:

MCLEAN

Additional Reporting:

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

Congressional District Place Of Performance:

11

Interagency Contracting Authority:

Not Applicable

Place Of Performance Zip Code(+4):

22102 - 3058 USPS ZIP Codes

Other Interagency Contracting Statutory Authority:

(1000 characters)

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:

Description:

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 OMB Policy on Sustainable Acquisition

InfoTech Commercial Item Category:

Select One

Claimant Program Code:

Description:

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:

Extent Competed:

Not Competed

Solicitation Procedures:

Only One Source

IDV Type Of Set Aside:

Type Of Set Aside:

No set aside used.

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:

Number Of Offers Received:	<input type="text" value="1"/>	Number of Offers Source:	<input type="text" value="This Action"/>
Small Business Competitiveness Demonstration Program:	<input type="checkbox"/>		
Simplified Procedures for Certain Commercial Items:	<input type="text" value="No"/>		
Preference Programs / Other Data			
Contracting Officer's Business Size Selection:	<input type="text" value="Other than Small Business"/>		
Subcontract Plan:	<input type="text" value="Plan Not Required"/>		
Price Evaluation Percent Difference:	<input type="text"/>	%	

Transaction Information

Award Type: Purchase Order **Prepared Date:** 12/21/2017 19:04:49 **Prepared User:** WILLIAM.QUIGLEY1@DHS.GOV
Award Status: Final **Last Modified Date:** 12/22/2017 16:11:30 **Last Modified User:** WILLIAM.QUIGLEY1@DHS.GOV
Closed Status: No **Closed Status Date:** **Closed By:**

Document Information

	Agency	Procurement Identifier	Modification No	Trans No
Award ID:	7012	70CDCR18P00000017	0	0
Referenced IDV ID:				
Reason For Modification:				
Solicitation ID:	70CDCR18Q00000005			
Treasury Account Symbol:	Agency Identifier: 70	Main Account: 0540	Sub Account:	Initiative: <input type="button" value="Select One"/>

Dates

Date Signed (mm/dd/yyyy) : 12/22/2017
Effective Date (mm/dd/yyyy) : 12/22/2017
Completion Date (mm/dd/yyyy) : 09/21/2020
Est. Ultimate Completion Date (mm/dd/yyyy) : 09/30/2020
Solicitation Date (mm/dd/yyyy) :

Amounts

Action Obligation: \$525,000.00
Base And Exercised Options Value: \$525,000.00
Base and All Options Value (Total Contract Value): \$6,373,488.00
Fee Paid for Use of IDV: \$0.00

Purchaser Information

Contracting Office Agency ID: 7012	Contracting Office Agency Name: U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT
Contracting Office ID: 70CDCR	Contracting Office Name: DETENTION COMPLIANCE AND REMOVALS
Funding Agency ID: 7012	Funding Agency Name: U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT
Funding Office ID: 70CCED	Funding Office Name: ENFORCMNTREMOVL OPNS HQ COMPLIANCE
Foreign Funding: <input type="button" value="Not Applicable"/>	

Contractor Information

SAM Exception:

DUNS No: 148508286	Street: 610 OPPERMAN DR
Vendor Name: WEST PUBLISHING CORPORATION	Street2:
DBAN:	City: EAGAN
Cage Code: 89101	State: 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
Number of Employees: 1508
State of Incorporation: MN
Country of Incorporation: USA
Annual Revenue: \$3,332,000,000

Business Types
 Corporate Entity, Not Tax Exempt
Line Of Business
 Manufacturer of Goods
Relationship With Federal Government
 All Awards
Organization Factors
 For Profit Organization
 Foreign Owned

Contract Data

Type of Contract:
Inherently Governmental Functions:
Multiyear Contract:
Major Program:
National Interest Action:
Cost Or Pricing Data:
Purchase Card Used As Payment Method:
Unfinalized 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

No - Service where PBA is not used.

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:

No

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)

Empty text box for Other Interagency Contracting Statutory Authority.

Principal Place of Performance

Principal Place Of Performance Code:

State Location Country
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:

Description:

Country of Product or Service Origin:

USA UNITED STATES

Place of Manufacture:

Not a manufactured end product

Domestic or Foreign Entity:

Foreign-Owned Business Incorporated in the U.S.

Recovered Materials/Sustainability:

No Clauses Included and No Sustainability Included OMB Policy on Sustainable Acquisition

InfoTech Commercial Item Category:

Select One

Claimant Program Code:

Description:

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::CL::IGF ACCESS TO LICENSE PLATE READER DATABASE

Competition Information

Extent Competed For Referenced IDV:

Empty text box for Extent Competed For Referenced IDV.

Extent Competed:

Not Competed under SAP

Solicitation Procedures:

Simplified Acquisition

IDV Type Of Set Aside:

Empty text box for IDV Type Of Set Aside.

Type Of Set Aside:

No set aside used.

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:

SAP Non-Competition (FAR 13)

Local Area Set Aside:

No

FedBizOpps:

Yes

A76 Action:

No

Commercial Item Acquisition Procedures:

Commercial Item

IDV Number of Offers:

Empty text box for IDV Number of Offers.

Number Of Offers Received:	<input type="text" value="1"/>	Number of Offers Source:	<input type="text" value="This Action"/>
Small Business Competitiveness Demonstration Program:	<input type="checkbox"/>		
Simplified Procedures for Certain Commercial Items:	<input type="text" value="Yes"/>		
Preference Programs / Other Data			
Contracting Officer's Business Size Selection:	<input type="text" value="Other than Small Business"/>		
Subcontract Plan:	<input type="text" value="Plan Not Included - No Subcontracting Possibilities"/>		
Price Evaluation Percent Difference:	<input type="text"/>	%	