

Attorney General of Missouri Andrew Bailey

August 2, 2024

Mayor Quinton Lucas 414 E. 12th Street Kansas City, MO 64106 Sent via mail and emailed to: mayorg@kcmo.org

Dear Mayor Lucas:

It has come to my attention that the Biden Administration has been conducting undisclosed flights to bring thousands of aliens, many of them illegal, into the United States, completely ignoring federal immigration laws or undermining them by allowing widespread fraud among applications for the program. Evidence has surfaced that some of these flights were to Kansas City. The citizens of our state deserve to know whether any city officials were aware of or were complicit in this activity, which may have violated state law.

By way of background, in addition to the millions of illegal aliens who have been released by the Customs and Border Patrol or are classified as "got-aways", it has been reported that the Biden Administration has admitted over 400,000 people (and quite possibly many more) from four particular countries into the United States as part of a special program.

There is also evidence that the Biden Administration has transported or participated in the transportation of illegal aliens into the United States. Reportedly, these individuals have been secretly flown to previously undisclosed locations within the interior of the country. It now appears that Kansas City was one such destination.

As state and local leaders, we are obligated to protect our citizens and uphold the law, even if federal authorities actively work to undermine it. My office is currently in litigation on this matter as we seek information from the federal government about its covert flights program and it is of utmost importance that the citizens of this state know the full extent of this off-the-books operation.

Therefore under Missouri's Sunshine Law codified in Chapter 610, RSMo., please produce the following public records:

- 1. All communications between any City employee and the email domain @dhs.gov between August 1, 2022 up through and including the date of this letter.
- 2. All communications between any City employee and the email domain @cbp.dhs.gov between August 1, 2022 up through and including the date of this letter.
- 3. All communications between any City employee and the email domain @ice.dhs.gov between August 1, 2022 up through and including the date of this letter.
- 4. The communications described in Paragraphs 1 − 3 above may be further limited to only those that relate to flights (including chartered flights or military flights) by which non-citizens have been flown into the greater Kansas City metropolitan area that include at least one of the following terms¹:
 - "flights";
 - "ghost flights";
 - "approved for travel";
 - "advance travel authorizations";
 - "got-aways";
 - "family-unification program";
 - "CBP One App";
 - "parole";
 - "Nicaragua";
 - "Cuba":
 - "Haiti";
 - "Venezuela"; or
 - "CHNV".
- 5. Any communications otherwise described by Paragraphs 1 through 4 above between employees of the mayor's office, whether or not a federal official or agency is included.

¹ These terms are inclusive of both their singular or plural forms.

The term "communications" used in these requests should be viewed as broadly as possible under the definition of "public record" in Chapter 610, RSMo, and include documents, electronic messages, emails, email attachments, text messages on official City phones, letters, memoranda, and any drafts of documents.

This request qualifies for a fee waiver because I am submitting it on behalf of a government agency, and all records requested are in the public interest so that the Attorney General's Office and the public can better understand the operations of the City and its relationship with the federal government. These records will contribute significantly to the public's understanding of these important issues. There is no commercial or profit motive for this request. Therefore, I request that all fees be waived. I also request that all documents be provided in electronic format.

I expect a production of documents or a compliant response under Section 610.023, RSMo, within three business days.

Sincerely,

JAMES S. ATKINS

First Assistant

Missouri Attorney General's Office



Attorney General of Missouri Andrew Bailey

August 2, 2024

Dr. Sam Page
41 South Central
Clayton, MO 63105
Sent via mail &email to: cecomments@stlouiscountymo.gov

Dear Dr. Page:

It has come to my attention that the Biden Administration has been conducting undisclosed flights to bring thousands of aliens, many of them illegal, into the United States, completely ignoring federal immigration laws or undermining them by allowing widespread fraud among applications for the program. Evidence has surfaced that some of these flights were to St. Louis County. The citizens of our state deserve to know whether any county officials were aware of or were complicit in this activity, which may have violated state law.

By way of background, in addition to the millions of illegal aliens who have been released by the Customs and Border Patrol or are classified as "got-aways", it has been reported that the Biden Administration has admitted over 400,000 people (and quite possibly many more) from four particular countries into the United States as part of a special program.

There is also evidence that the Biden Administration has transported or participated in the transportation of illegal aliens into the United States. Reportedly, these individuals have been secretly flown to previously undisclosed locations within the interior of the country. It now appears that St. Louis County was one such destination.

As state and local leaders, we are obligated to protect our citizens and uphold the law, even if federal authorities actively work to undermine it. My office is currently in litigation on this matter as we seek information from the federal government about its covert flights program and it is of utmost importance that the citizens of this state know the full extent of this off-the-books operation.

Therefore under Missouri's Sunshine Law codified in Chapter 610, RSMo., please produce the following public records:

- 1. All communications between any County employee and the email domain @dhs.gov between August 1, 2022 up through and including the date of this letter.
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- 3. All communications between any County employee and the email domain @ice.dhs.gov between August 1, 2022 up through and including the date of this letter.
- 4. The communications described in Paragraphs 1-3 above may be further limited to only those that relate to flights (including chartered flights or military flights) by which non-citizens have been flown into St. Louis County that include at least one of the following terms¹:
 - "flights";
 - "ghost flights";
 - "approved for travel";
 - "advance travel authorizations";
 - "got-aways";
 - "family-unification program";
 - "CBP One App";
 - "parole";
 - "Nicaragua";
 - "Cuba";
 - "Haiti";
 - "Venezuela"; or
 - "CHNV".
- 5. Any communications otherwise described by Paragraphs 1 through 4 above between employees of the County, whether or not a federal official or agency is included.

¹ These terms are inclusive of both their singular or plural forms.

The term "communications" used in these requests should be viewed as broadly as possible under the definition of "public record" in Chapter 610, RSMo, and include documents, electronic messages, emails, email attachments, text messages on official County phones, letters, memoranda, and any drafts of documents.

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JAMES S. ATKINS

First Assistant

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