PRIVACY INTERNATIONAL

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James C. Smith
President and Chief Executive Officer
Thomson Reuters Corporation
3 Times Square
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 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]:

[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&region=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 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 identity 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

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[5] https://www.fbo.gov/index?s=opportunity&mode=form&id=71911de5fa638ed0a391f01f520c0e2a&tab=core&_cview=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

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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:				

	Agency Identifier	*Main Account*	*Sub Account*	*Initiative*
Treasury Account Symbol:	70	0540		Select One

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: Remove 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 Show Details

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

Legislative Mandates

Clinger-Cohen Act: No
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: *State Location Country* MD USA
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 USPS ZIP Codes

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 P
Bundled Contract: Not a bundled requirement
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 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: Yes
A76 Action: No
Commercial Item Acquisition Procedures: Commercial Item
Number Of Offers Received: 1
Small Business Competitiveness Demonstration Program: ☐
Commercial Item Test Program: No

Preference Programs / Other Data

Contracting Officer's Business Size Selection: Other than Small Business
Subcontract Plan: Select One
Price Evaluation Percent Difference: %

New | Save Draft | Validate | Approve | Correct | Modify | Save Tmplt | Delete | Print | Close Out | Help

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:				

	Agency Identifier	*Main Account*	*Sub Account*	*Initiative*
Treasury Account Symbol:	70	0540		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:	Not Applicable		

Contractor Information

SAM Exception: Remove 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 Show Details

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:	Firm Fixed Price
Inherently Governmental Functions:	Other Functions
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:	

** 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: No
Materials, Supplies, Articles, and Equip: Not Applicable
Construction Wage Rate Requirements: No
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

	State	Location	Country
Principal Place Of Performance Code:	VA		USA

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 USPS ZIP Codes

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:	1	**Number of Offers Source:**	This Action
Small Business Competitiveness Demonstration Program:	☐		
Simplified Procedures for Certain Commercial Items:	No		

Preference Programs / Other Data

Contracting Officer's Business Size Selection:	Other than Small Business
Subcontract Plan:	Plan Not Required
Price Evaluation Percent Difference:	%

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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			

	Agency Identifier	*Main Account*	*Sub Account*	*Initiative*
Treasury Account Symbol:	70	0540		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:	Not Applicable		

Contractor Information

SAM Exception: Remove 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 Show Details

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:	Firm Fixed Price
Inherently Governmental Functions:	Closely Associated
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: 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)

Principal Place of Performance

	State	*Location*	*Country*
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: **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:

Extent Competed: Not Competed under SAP

Solicitation Procedures: Simplified Acquisition

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:

Number Of Offers Received:	1	**Number of Offers Source:**	This Action
Small Business Competitiveness Demonstration Program:	☐		
Simplified Procedures for Certain Commercial Items:	Yes		

Preference Programs / Other Data

Contracting Officer's Business Size Selection:	Other than Small Business
Subcontract Plan:	Plan Not Included - No Subcontracting Possibilities
Price Evaluation Percent Difference:	%