

GRAFTON COUNTY COMMISSIONERS' MEETING

Department of Corrections

North Haverhill, NH 03774

October 28, 2025

PRESENT: Commissioners McLeod, Piper, Hedberg, County Administrator Libby, Assistant County Administrator Elsholz, and Administrative Assistant Norcross

OTHERS: Alternative Sentencing Director Mitchell, DoC Superintendent Lethbridge, Maintenance Supt. Oakes, County Attorney Hornick, Alix Olson, Brie Choate, Mary Valliant, Alex Valliant, A. Schaalman – via Teams, Emilie Smith – via Teams, Howard Hatch – via Teams, Sheriff Myers – via Teams, Register Monahan – via Teams, Nick De Mayo – via Teams, Omer C. Ahern Jr. – via Teams, Peter Browne – via Teams.

Commissioner McLeod called the meeting to order at 9:00 am.

Alternative Sentencing Director Mitchell arrived and gave the following report (* see attached)

Opioid Abatement Request – AS Director Mitchell stated that they did not include the cost for work cellphones for their new Certified Recovery Support workers in their original Opioid Abatement Funding request. She is now requesting an additional \$4,500, which will cover three (3) phones for three (3) years.

MOTION: Commissioner Piper moved to spend \$1,500 a year for a total of \$4,500 over a three (3) year period for cell phones for the new CRSWs of Opioid Abatement funding. Commissioner Hedberg seconded the motion, and all were in favor.

DoC Supt. Lethbridge arrived and gave the following report (* see attached)

1. THEIA AI Upgrade Request – Supt. Lethbridge reported that the Commissioners had approved a request to use Opioid Abatement Funds to pay for the THEIA AI upgrade to the Soder RS body scanner. He explained that Soder had given them a cost of \$12,500 per year and that he would not request funding for a second year if the AI tool did not prove to be useful. He stated that Soder did not disclose that the upgrade also required a \$750 one (1) time set up fee and a three (3) year commitment. He stated that they tried to negotiate a one (1) year contract but were not successful. After their evaluation of the upgrade, they have found that it would be a useful tool for intake officers. He stated that he is requesting that use of Opioid Abatement funds for a three (3) year contract.

MOTION: Commissioner Hedberg moved to approve using Opioid Abatement funds for a three (3) year contract for the THEIA AI upgrade to the Soder RS body scanner at a total price of \$38,250.00. Commissioner Piper seconded the motion, and all were in favor.

2. Inmate Supervision and Accountability SOP – Supt. Lethbridge explained that they changed some of the times they conduct inmate counts that match the current Jail Management Software.

He explained that they have added a master roster count, which also verifies that inmates are in the correct bunk.

MOTION: Commissioner Piper moved to approve the Inmate Supervision and Accountability SOP. Commissioner Hedberg seconded the motion, and all were in favor.

3. Request from Coos County – Supt. Lethbridge stated that Coos County requested that Grafton County house an inmate due to a recommendation from the trial court. Several officers from Coos County are listed as witnesses for the prosecution. He spoke with the Superintendent from Coos County, and they agreed that not honoring the request may open an appeal for a lengthy and expensive trial. Coos County will be responsible for all medical expenses and agreed to reimburse Grafton County under the same terms as the contract for housing female inmates at \$60/day.

MOTION: Commissioner Hedberg moved to approve the inmate transfer from Coos County to Grafton County DoC. Commissioner Piper seconded the motion, and all were in favor.

4. Firing Range SOP – Supt. Lethbridge stated that this is a county-wide policy and Supt. Oakes spearheaded getting all the stakeholders together to create the policy. He explained that they worked together as a team to put this policy together. They have a county-wide calendar to schedule when the firing range will be in use, and a Firearms instructor will be required to be present when the firing range is being used. Supt. Oakes installed gates on different approaches to the range, and the gates will be shut with signage when the range is in use. He noted that they have identified another area to move the range, but it would incur significant costs. They have discussed clearing that land during the next scheduled timber cut. Commissioner Hedberg stated that this is a huge improvement from what it was. It is not ideal, but she feels they should take steps to make it better as they move forward.

MOTION: Commissioner Hedberg moved to approve the Firing Range SOP. Commissioner Piper seconded the motion, and all were in favor.

5. Supt. Lethbridge requested a nonpublic session.

MOTION: * 9:43 AM Commissioner Hedberg moved to enter into a non-public session for the purpose of the dismissal, promotion, or compensation of any public employee or the disciplining of such employee, or the investigation of any charges against him or her, unless the employee affected (1) has a right to a meeting and (2) requests that the meeting be open, in which case the request shall be granted according to RSA 91-A: 3, II (a). Commissioner Piper seconded the motion. This motion requires a roll call vote. Commissioner McLeod called the roll. Commissioner Piper said, "Yes", Commissioner Hedberg said, "Yes," and Commissioner McLeod said, "Yes." Commissioner McLeod stated that a majority of the board voted "yes" and would now go into non-public session.

* 9:48 AM Commissioner McLeod declared the meeting back in public session.

MOTION: Commissioner Hedberg moved to uphold the recommendation of the DoC Superintendent for discipline. Commissioner Piper seconded the motion, and all were in favor.

County Attorney Hornick

Atty. Hornick reported that the state budgetary issue has affected them, and they will not have any jury trials in December. There are people in the DoC who have been waiting in pretrial for over a year. She noted that they will be picking a jury next Monday for a non-incarcerated defendant that is a few years old. They will focus on training new attorneys they have during December.

Atty. Hornick reviewed a list of the different types of cases they have been seeing in the office.

Opioid Abatement – Atty. Hornick stated that the Drug Court treatment team is requesting finances to add Blue Heron, a counseling agency, to put a full-time team member to provide mental health assistance. She is going to have a policy meeting to see where they stand in terms of best practices. She wanted to start a conversation with the Commissioners about Opioid Abatement funding. CA Libby stated that there is \$312,000 unobligated in the County's Opioid Abatement Fund and noted that money comes in periodically to that fund. There is funding that the state has as well because it keeps 85% of the proceeds. Some of that is administered through United Way. Commissioner McLeod stated that other departments have put together a proposal for funding and stated that it is reasonable for Atty. Hornick to do the same. Atty. Hornick stated that she will talk with the DoC Supt. Lethbridge and AS Director Mitchell to see if they can come up with a proposal.

Atty. Hornick thanked the Commissioners for providing informational sessions around the County for the proposed courthouse. She stated that she was offended by people not listening and wanting to speak over the Commissioners at the Littleton session. She is grateful for what Supt. Oakes presented and his position, as he has been doing this for years and understands. She understands that people do not want to spend the money, but they will eventually have to and kicking it down the road seems like a foolish thing to do. Atty. Hornick stated that there was a person in the audience who spoke highly of the asbestos in the building and said it would stop a fire from reaching them. There were people who laughed at that comment, and she was offended by that. She apologized for her town and what they had to go through at that meeting.

Commissioner McLeod stated that her biggest concern is people thinking the justice system is not necessary in the County. She asked if Atty. Hornick could explain why it is important to have that in the County. Atty. Hornick explained that they have a large county without a lot of transportation, and it is very rural. There are a lot of areas that people can prey upon those who may have a lack of education or funds to be productive members in their own communities. They sometimes fall prey to the suggestions on the internet, such as drugs. They are charging upwards of 4000 types of charges a year. She stated that if she ran the world, she would make sure families had all of the help and assistance they needed the moment they had kids, schools had the money to do the best jobs they could, but those ideas have gone by the wayside. The reason the justice system is important because mental health courts, drug treatment recovery courts, and the

work that Alternative Sentencing is doing provide options for nonviolent mental health-affected people, rather than jail, but they cannot do that without a justice system that embraces those ideas. They also cannot do that without a Department of Corrections, as there are many dangerous people out there. She stated that the sexual abuse cases in the county are very high as well. The biggest group in her office that focuses on a specific crime is their Sexual Assault Resource Team. She feels very strongly about this system.

Atty. Hornick stated that Detective Sgt. Robert Bruno was a long-time child sex abuse investigator; he passed away, but his family and wife decided to establish an award for an investigation that shows the same drive as he did. This year, the award is going to Bri Gerrior, from Holderness Police Department.

Alexandra Valliant – 287(g) Transparency Request

A. Valliant reviewed the following proposal for a 287 (g) transparency policy with the Commissioners (* see attached)

Commissioner Hedberg stated that one of the sticking points with the Sheriff's position is that she does not need to share any of this. There have been filings of right to know, and they have been declined. This board generally believes in transparency. If there is no information to put out there, they do not have a mechanism to get that information. Commissioner McLeod stated that the majority of the board did not approve of the Sheriff signing the agreement. It should have come before the Commissioners because of the use of County funds. A. Valliant asked the Board of Commissioners to consider this proposal and talk to the Sheriff.

Commissioner McLeod stated that this is well-written, documented, and researched.

Commissioner Piper thanked A. Valliant for her effort and work in presenting this information in a digestible way. She appreciates her comment that the data would show discretion used, and that is an important thing to keep in mind, that their law enforcement uses discretion. Commissioner McLeod encouraged one of her colleagues to reach out to the Sheriff. She has been publicly slandered and ridiculed for trying to reach out to her.

Commissioner Hedberg stated that she sent an email to the Sheriff requesting to meet and received a response that the Sheriff is out of the office this week. She will bring this information with her to meet with the Sheriff.

Supt. Oakes arrived to open bids for the Nursing Home Rear Landscape Project.

Supt. Oakes stated that a site visit was a requirement before submitting a proposal. Two (2) companies came and did the inspection: BreadLoaf and Murray's Market. He stated that Murray's Market decided not to bid after coming, as it would be one of the biggest projects they have taken on. BreadLoaf does work up to \$20 million, and it is a much larger business. The Commissioners received one (1) proposal for the project as follows:

- BreadLoaf - \$1,290,000.

Supt. Oakes stated that the grant they received for this project is \$750,000. This exceeds the funding available. He stated that it would be nice to receive more competition. He would recommend rejecting the bid because it is not in their budget, and he would like to have a conversation with the vendor. He would like to rebid this again, effective today.

MOTION: Commissioner Hedberg moved to reject the bid from BreadLoaf due to it being out of their budget. Commissioner Piper seconded the motion, and all were in favor.

Commissioner McLeod thanked Supt. Oakes for attending the courthouse information sessions and speaking. It was very helpful and informative.

Supt. Oakes requested a nonpublic session.

MOTION: * 11:02 AM Commissioner Hedberg moved to enter into a non-public session for the purpose of consideration of security-related issues bearing on the immediate safety of security personnel or inmates at the county correctional facilities by county correctional superintendents or their designees. according to RSA 91-A: 3, II (g). Commissioner Piper seconded the motion. This motion requires a roll call vote. Commissioner McLeod called the roll. Commissioner Piper said, "Yes", Commissioner Hedberg said, "Yes," and Commissioner McLeod said, "Yes." Commissioner McLeod stated that a majority of the board voted "yes" and would now go into non-public session.

* 11:18 AM Commissioner McLeod declared the meeting back in public session.

Agenda Items:

1. Courthouse Discussion – Review of Public Meetings

CA Libby stated that they have had four (4) public meetings regarding the proposal for the courthouse, and she thinks they heard a lot of good information as well as negative information. They heard information that they can learn from as well. CA Libby stated that before anything goes further, they should have a conversation and see if there is anything different they want to do at this point in time.

Commissioner McLeod added that they heard a lot of good suggestions that were added into the presentations but noted that there were a lot of misconceptions about some of the information. People thought the concept was a finished building plan, as opposed to a concept and what the potential cost would be. Commissioner McLeod thanked CA Libby for pulling the tax impacts together for the presentations.

Commissioner Piper stated that when they say the conceptual model, there were interesting ideas introduced in Lebanon. The Sheriff discussed security and the reconfiguration of the courthouse, which increases the number of staff needed. Right now, the floors are in the same sight line, where the new configuration is not the case. She felt like this was a solid point. She stated that Rep. Corman mentioned the issue of what a building would look like that housed just County

departments. She wonders if the Sheriff's concerns could be corrected at this point. Supt. Oakes explained that no matter if you renovate the existing or build a new building, all the advantages the Sheriff spoke of will go away because, from a life safety standpoint, they cannot have openings between floors and all stairways would be enclosed. Right now, they have three (3) floors, and they do not have people on all floors at all times. CA Libby noted that the important thing to remember is that the county is reimbursed from the state; if they need more court security officers, that will be an increased cost to the state. There has to be more discussion between the Sheriff and the Bureau of Courts. The courts are comfortable being on the second floor, where the Sheriff expressed concerns.

Commissioner Hedberg stated that one (1) of the conversations that occurred was with the buildings close together; they have a secure connection. The architects looked at that, and it was not feasible; there would be some transport different from what it is now, and they understand that. Supt. Oakes stated that the question of Probation and Parole being located here was brought up. He stated that during their meetings with Probation and Parole, they said they would like to have a satellite office in Plymouth, but their hub would still be in North Haverhill. The Sheriff expressed concerns about the space the courts were looking for, as well, that they did not need a jury assembly room.

Supt. Oakes gave an example, had they decided to renovate the existing building, of renting a house to someone, and work needed to be done to the house, would the owner go to the renter and say you need to pay for half of the renovations, as well as increasing their rent. He stated that the County owns the existing building, and had they stayed with renovating the existing building, they would have likely not had these capital cost conversations with the courts.

CA Libby stated that she received an email from Sarah Lineberry stating that the County should have a letter of commitment from the state this week. She noted that the courts have been here for 54 years, and they have renewed many leases during that time. Commissioner McLeod stated that if you add up the state's lease payment over the 54 years, they have more than paid for their share of the building and likely paid more than the cost of the building.

CA Libby stated that they have been very clear in stating that the figures for the bonds and pricing are not set in stone, but there are people who are saying that this is what is happening.

CA Libby stated that the Commissioners voted to approve the conceptual design and move it to the Delegation for a bond vote. She asked if they wanted to continue that process.

Commissioner McLeod stated that they have ARPA funds and asked if they can continue the schematic design. Supt. Oakes stated that if the vote fails, they have a few options. They can downsize by pulling the Register of Deeds from the building, but noted that if they remove Deeds from downstairs, it will have a domino effect upstairs.

Commissioner Piper stated that something that surprised her at one of the meetings was the degree to which members of the public suggested making revisions that pared the expenses back. There might be a few items, Register of Deeds included, that could be trimmed back. She and Commissioner McLeod argued for the Register of Deeds Office being in the courthouse based on

the argument for safety and the chronic safety concerns that have been brought to the Commissioners over the years. They felt a sound argument was made by the current Register. The Register of Deeds has changed her mind, and Commissioner Piper respects that, but it seems as though the public has concerns. Commissioner Piper stated that she feels that taking the Register of Deeds and the Jury Assembly Room out will not get the project to pass.

Commissioner McLeod stated that she thinks they need to talk to the Delegation and asked if they should push this out further. These figures are the 4th quarter 2026 figures. She thinks they have more time to think about what the Delegation is looking for. Commissioner Piper agreed and stated that she thinks that is a good idea, it seems like there might have been some movement in terms of what they want to vote for. Commissioner Hedberg noted that she can see the benefits of that, but she does have concerns about pushing out; if they have a catastrophic failure to the mechanicals, they will be doing this on the fly, as well as trying to find space for everyone. She would be in support of pushing it back, but not indefinitely. CA Libby stated that they can discuss this with the Executive Committee on November 17th and discuss what they need to feel comfortable with this project. Supt. Oakes suggested finding out what people's positions are on the current design, and what they would consider a reasonable way of resolving the issue if they are opposed. He also noted that they have thirteen (13) months left to spend that ARPA money, and they do not want to lose that.

CA Libby stated that they have heard a lot of questions about why they cannot fix the current building room by room or in pieces. There are answers to those questions, and they are not able to do that. She stated that no matter what they do, it is going to cost millions of dollars. Commissioner McLeod added that it will also cost more the longer they put it off. CA Libby stated that if they keep putting it off and something catastrophic happens, they will then have another set of issues. It is important to start the conversations with the Executive Committee and see what they think is the next best approach. She will pass that information on to Chairman Sykes.

Agenda Items:

1. Approval of Minutes – 10/21/25 & 10/21/25 Courthouse Informational Meeting

MOTION: Commissioner Piper moved to approve the minutes from the October 21st Courthouse Informational Meeting as written. Commissioner Hedberg seconded the motion. Commissioner Piper and Commissioner McLeod were in favor. Commissioner Hedberg abstained. With the vote being two (2) in favor and one (1) abstention, the motion passes.

Commissioner McLeod stated that she has not had a chance to read the minutes from the 10/21 Commissioner meeting, so they will not vote on them at this time.

2. The Commissioners signed check registers 1052-1056; 2025-10.24.2025.

3. Request from Extension & Commissioners' Office – Office Closure – CA Libby stated that UNH Extension has requested to close their office on Wednesday, November 26th and Friday,

December 26th. The two (2) county employees will use earned time for those days. CA Libby stated that she would also like to request that the Commissioners' Office be closed on Friday, December 26th as well. Employees will use earned time for the day.

MOTION: Commissioner Piper moved to close the UNH Extension office November 26th and December 26th and close the Commissioner's Office December 26th.

Commissioner Hedberg seconded the motion and all were in favor.

4. Commissioner McLeod signed a CDBG Drawdown – CEDC Micro for \$2,350.

5. DHHS – Rural Health Transformation – EMS Application – Commissioner McLeod reported that the County can submit a proposal for rural EMS. She has been working on this application and has asked Senator Prentiss and Executive Councilor Hill to speak on their behalf with DHHS to move this along. The Commissioners further discussed the application.

MOTION: Commissioner Hedberg moved to submit a Rural Health Transformation grant application for the EMS. Commissioner Piper seconded the motion, and all were in favor.

Public Comment:

1. Emilie Smith stated that she is concerned about the efforts to supply services for EMS for certain towns. They did a survey in Lyman and Lyman said no, they did not want that. In Lyman, they do not have any fire or EMS services. They rely on mutual support but all of their kids grow up volunteering in Lisbon High School and become volunteer firefighters or military service. The Grafton County Commissioners serve all of Grafton County and she does not understand how they can get a grant that services one (1) piece of the county.

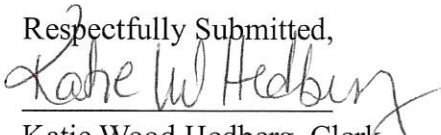
2. Nick De Mayo stated that he does not know why the County Attorney is apologizing for the Littleton meeting. There were 100 people there and only a couple voiced an opinion supporting the new courthouse. He also stated that they are losing Medicare in Grafton County. He discussed his concerns for the high salaries of employees at Grafton County. He stated that revisiting the focus of the courthouse would do them all a great service.

3. The Commissioners conducted their semi-annual inspection of the Department of Corrections with Superintendent Lethbridge and Captain Kendall per RSA 30-B:12.

4. Commissioner McLeod and Commissioner Hedberg worked on the DHHS – Rural Health Transformation – EMS Application.

4:00 PM With no further business, the meeting adjourned.

Respectfully Submitted,



Katie Wood Hedberg, Clerk

Directors Report:

September invited the process of interviewing individuals for the Certified Recovery Support position approved for Alternative Sentencing programs. Three part time staff were hired to work with inmates preparing to be released from the Department of Corrections and with participants of Alternative Sentencing programs. The new staff will work to support community integration and access to services for people working toward or who are in early recovery.

The Intimate Partner Domestic Violence team attended the "Partnering for a Future Without Violence" conference, delivered through the Department of Justice. The conference was helpful in both victim advocacy skills and understanding patterns of behaviors of domestic violence. The conference also helped build awareness of the importance of victim reporting and methods of obtaining professional help from the therapeutic and criminal justice systems.

The Mental Health Court team has been receiving training on a new database that will allow the State of NH to track data for treatment courts with a goal of providing funding to mental health court programs in the future. The team will begin utilizing this database by the end of October.

In September, Alternative Sentencing spent \$2,600.00 from the Opioid Abatement Funds. \$850.00 was used from the Local Assistance and Tribal Consistency Fund in September.

Census:

Alternative Sentencing and Mental Health Court had 43 active participants, 0 completions from any programs. There are 13 referrals pending for Alternative Sentencing programs, 18 referrals for Mental Health Court, plus 15 *actively supported* applicants for Mental Health Court that have not pled in yet.

**Actively supported meaning, the applicant is being provided intensive case management by the Mental Health Court team before pleading into the program. This is often a necessary step to stabilize the individual enough to move to the next step.*

*Alternative Sentencing Programs:

Juvenile Restorative Justice

Adult Felony and Misdemeanor Diversion

C.A.R.E & C.A.R.E+

Intimate Partner Domestic Violence Program: Emerge

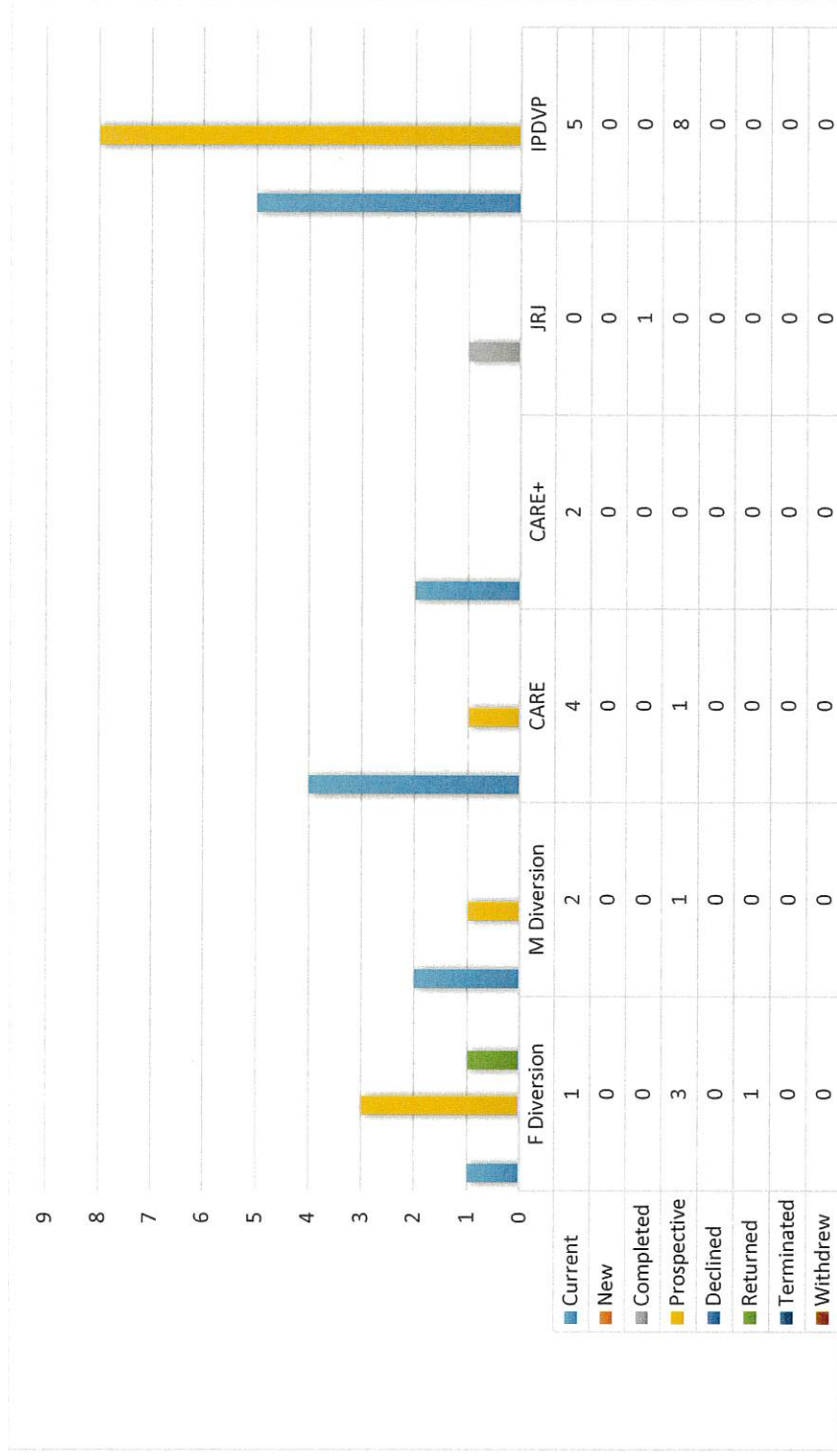
Mental Health Court

Anger Management Assessment and Programming

Life Skills Group

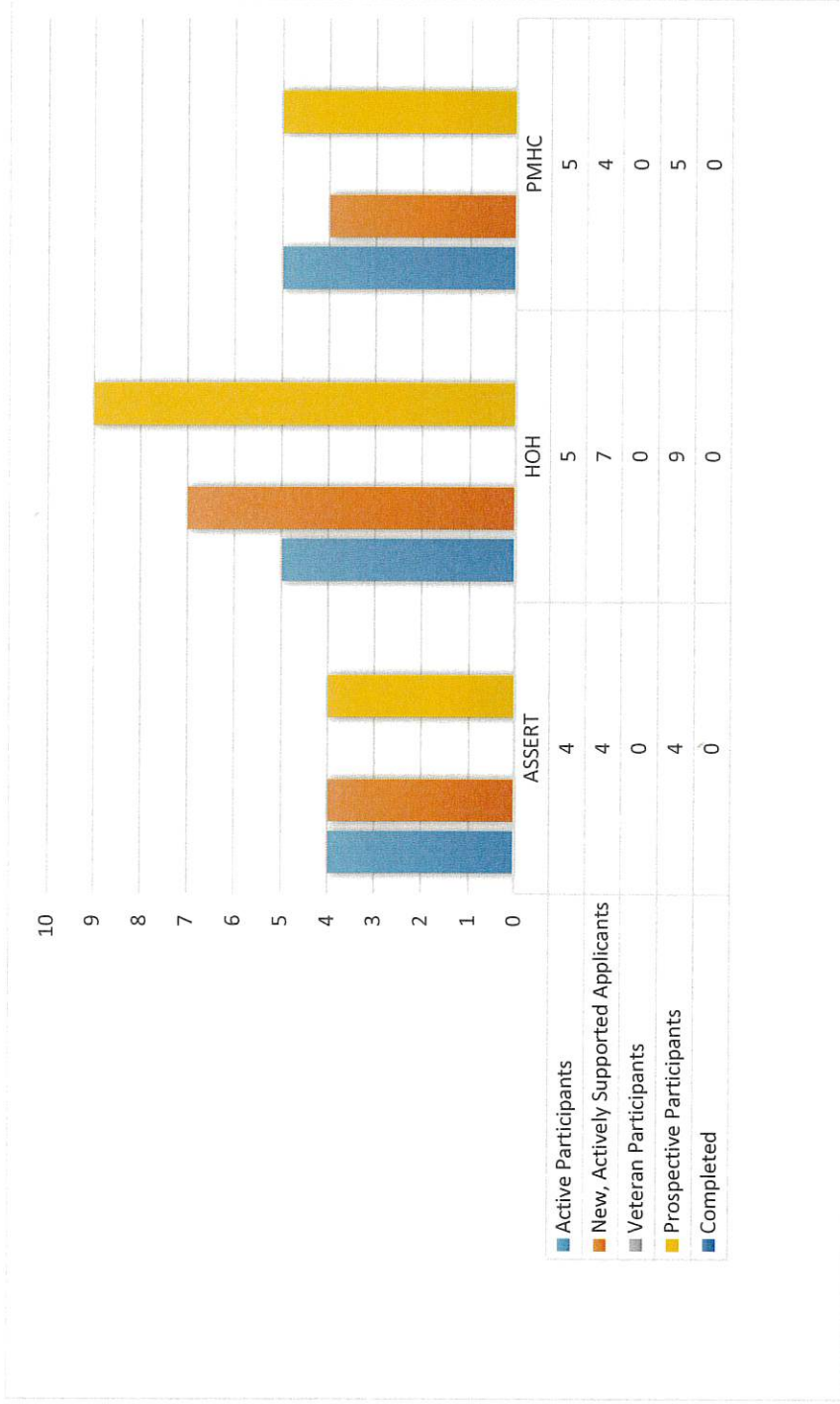
Alternative Sentencing Programs

SEPTEMBER 2025

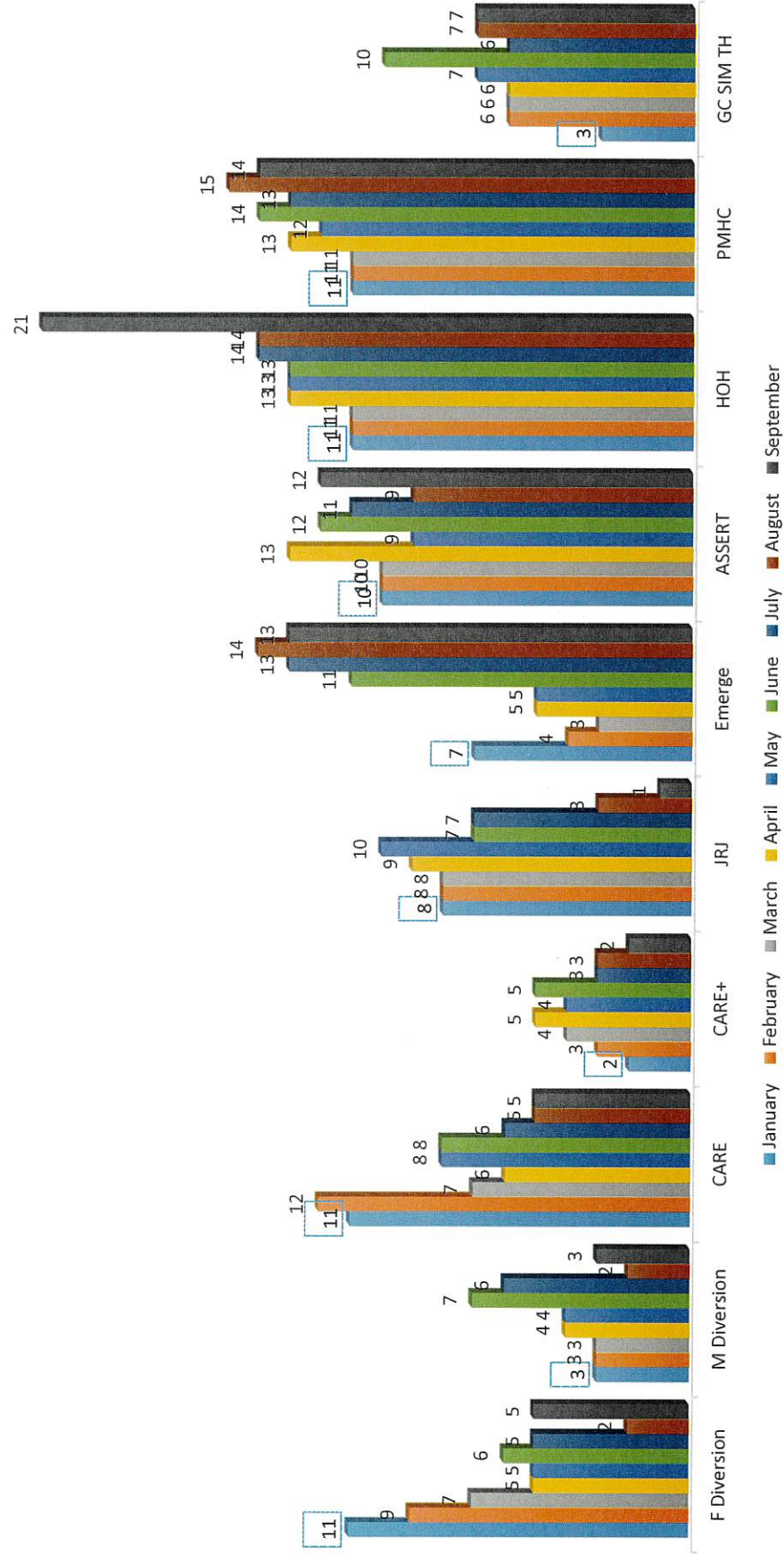


Mental Health Court

SEPTEMBER 2025



Annual Numbers



	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
JRJ												
AD	\$90.50	\$90	\$100	\$230	\$288	\$363	\$44		\$250			
MISSED												
LATE												
+ UA's												
Anger Management	\$35		\$50	\$110				\$50				
Emerge	\$250	\$403	\$100	\$575	\$575.25	\$525	\$350	\$625	\$350			
CARE						\$75			\$10			
MISSED												
+ UA's												
BDAS	\$1628.81	\$1901.42	\$1682.31	\$3270.02	\$3184.34	\$3676.78	\$3288.68	\$2616.79	\$2185.57			
Totals	\$1969.31	\$2394.92	\$1882.31	\$4,185.02	\$4047.59	\$4639.78	\$3682.68	\$3291.79	\$2795.57			
Grand Total	<u>\$3598.12</u>	<u>\$5993.04</u>	<u>\$7962.35</u>	<u>\$10357.27</u>	<u>\$12239.58</u>	<u>\$16,424.60</u>	<u>\$20,472.19</u>	<u>\$25,111.97</u>	<u>\$28,794.65</u>			

Monthly Department of Corrections Activity Report

September 2025



Major Incidents:

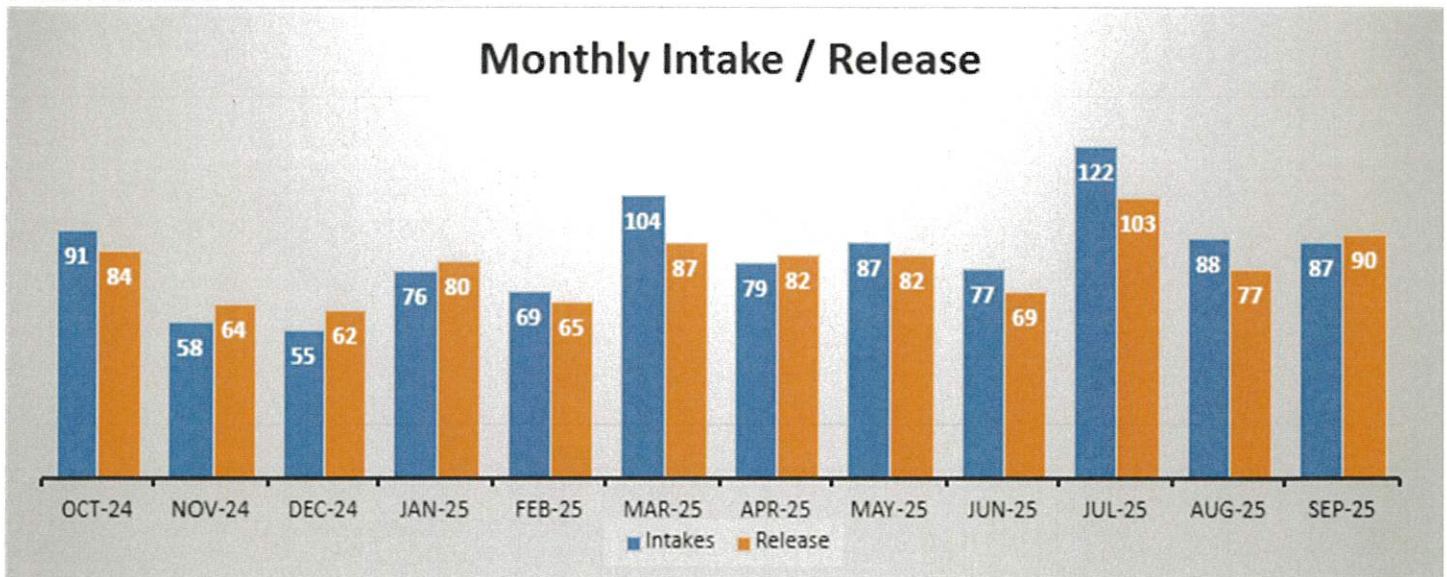
There were no major incidents, aside from the medical incidents below, in September.

Population Data:

Total Intakes for the Month: **82** (Coos County Females:5)

Total Releases for the Month: **87**

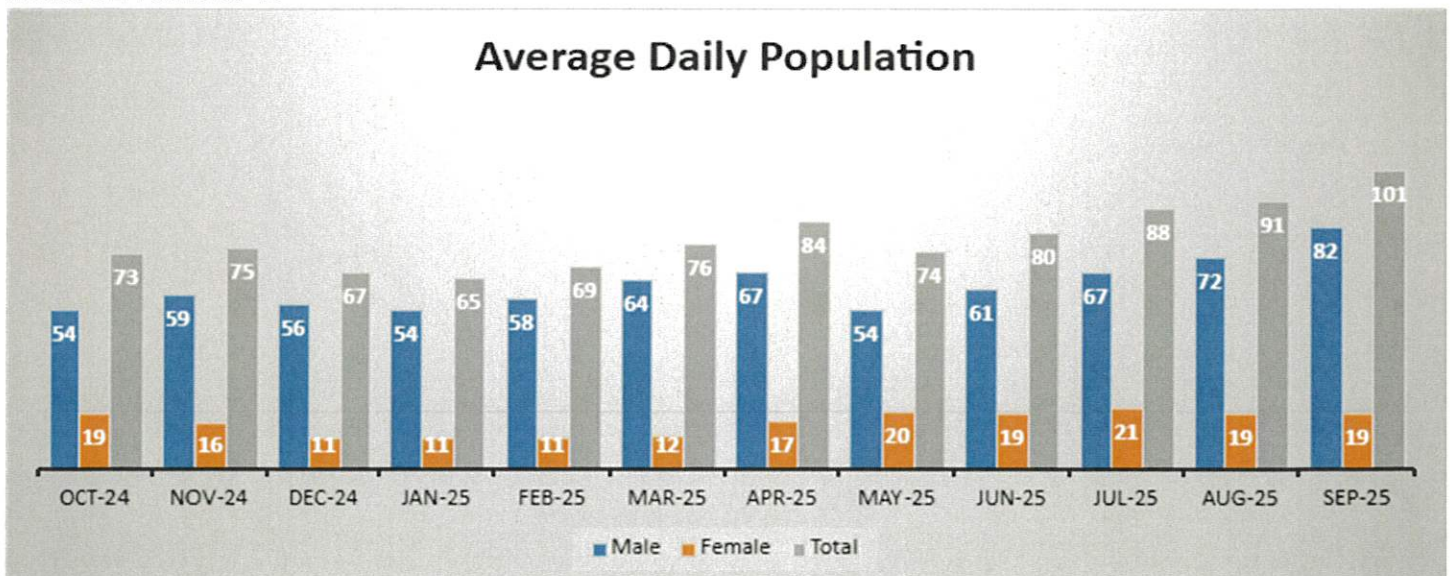
Monthly Intake / Release



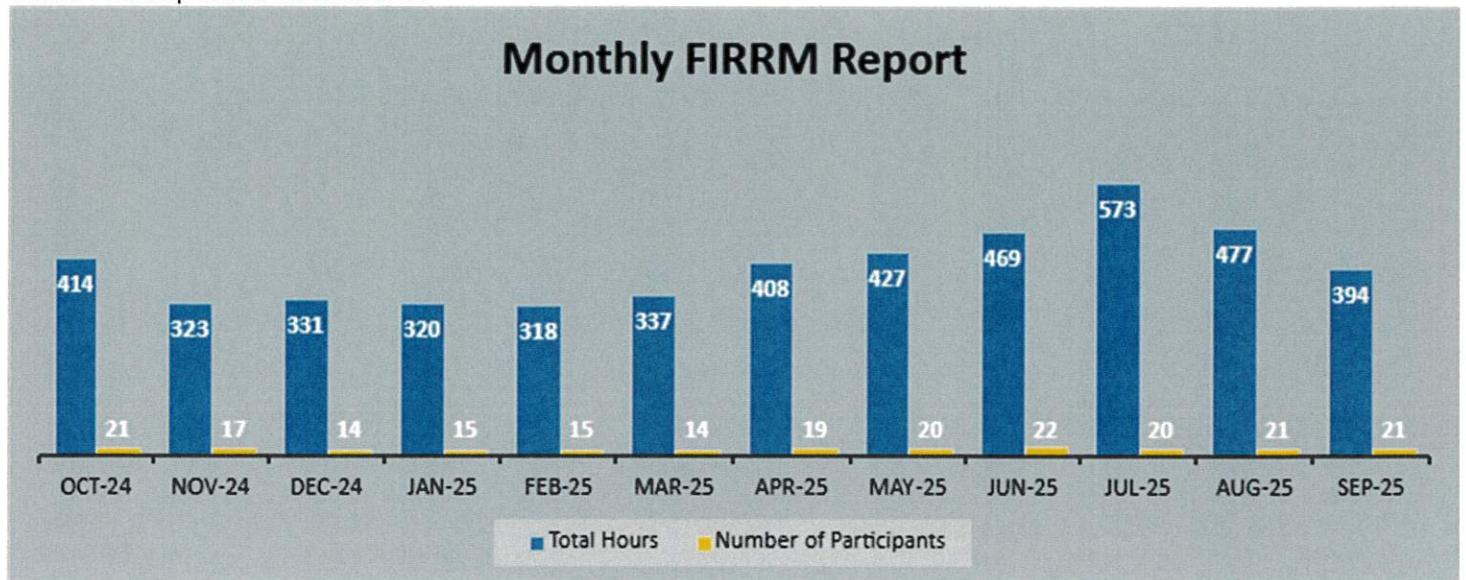
In House Average Daily Population for the Month: **101**

Male: **82** Female: **19**

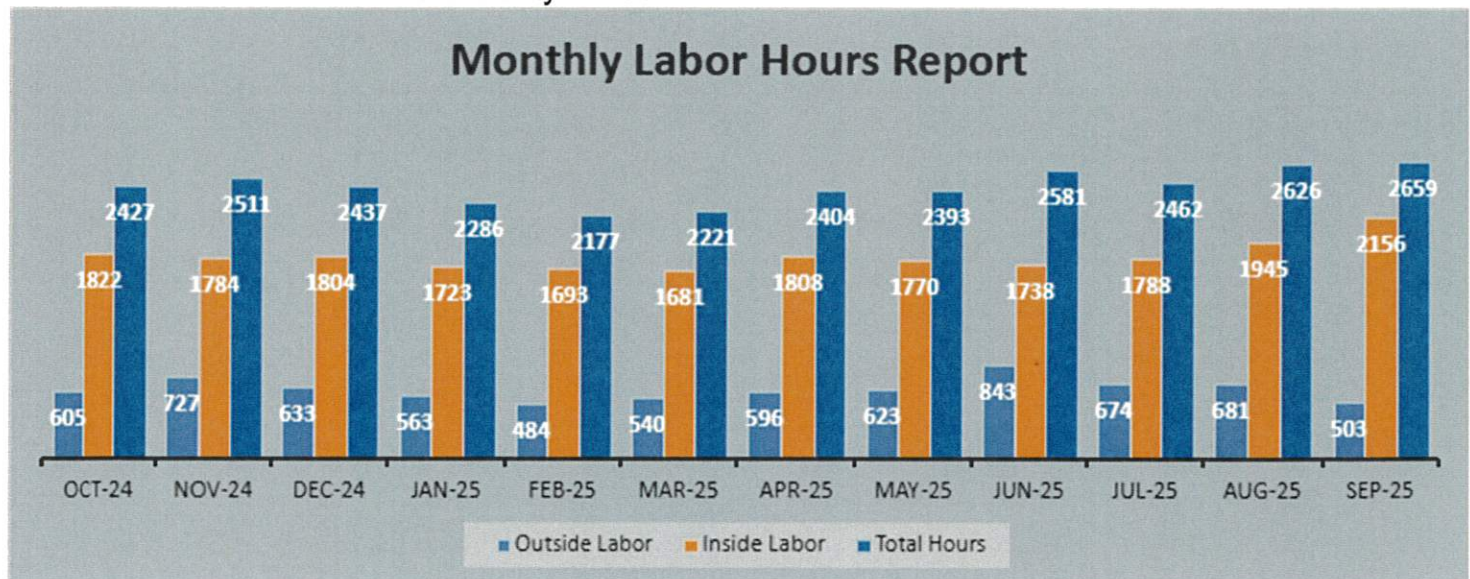
Average Daily Population



Inmates participating in FIRRM program during the month: **21**
 Total Participation Hours: **394**



Hours of inmate labor outside the facility: **503**
 Hours of inmate labor inside the facility: **2156**



Food Service:

Average per meal cost to feed each inmate: \$1.85

The cost per meal was up \$.03 from September. 8417 inmate meals were served during the month of October, for a total food expenditure of \$15,531. The DOC received 3,585 pounds of butternut squash from the County Farm, which was processed and stored in September.

Medical:

A newly arrested inmate was brought to the jail on a fugitive from justice warrant originating in Massachusetts. The inmate was homeless and reported consuming unknown drugs prior to his arrest. Within six hours of arriving at the facility, the inmate began having seizures. Officers and nursing staff responded immediately, gave medical aid, and the inmate was transported to Cottage Hospital and then immediately transferred to Dartmouth Hitchcock. This resulted in a multi-day hospital detail. The bill for initial treatment of this one inmate, pre-admission, exceeded \$25,000.

A pregnant inmate was booked into the jail at the end of the month and was transported to the hospital due to opioid use disorder and a high-risk pregnancy, resulting in a twelve-day hospital stay that carried into October.

These were the most significant hospital details during the month, and two other inmates were transported to the hospital for shorter durations. These hospital details are tremendously expensive, as officers must come in on overtime shifts to maintain custody of one inmate at the hospital, in addition to the medical expenses themselves. Caanan PD also requested assistance from the jail with an arrest they had transported to the hospital prior to coming to the jail who was also admitted; at the same time the DOC was already staffing two hospital details. Capt. Kendall and Lt. Allaire covered hospital shifts in September due to the DOC running out of officers.

With the bail reform changes, judges appear less willing to place a personal recognizance bond for medical reasons. Medical and overtime cost centers are being depleted at an unsustainable rate for the approved budget. The jail census currently includes several medically fragile individuals with significant charges; the cost of outside medical care will likely remain high for the remainder of the budget year.

Significant Developments and Achievements:

Officer Ben Balch and Officer Bell graduated from the NHAC Corrections Academy in September.

New Hampshire began requiring jail to complete an annual Race and Ethnicity report last year. The Department of Corrections compiled statistics to submit this report to the Chief Justice, Attorney General, Senate Judicial Committee, and House Criminal Justice Committee. A copy of the submitted report is attached for the Commissioners to review; no action is required on it.

The Department of Corrections is developing policy regarding the Anti-Sanctuary bill that passed this summer and will take effect January 01. The statutory changes apply to individuals with ICE detainers who were brought to the DOC on state criminal charges and who would be eligible for release from the facility on the state charges.

The criminal trial of Max Fornier has been scheduled for November. Numerous DOC staff are subpoenaed on this case, which will have another large impact on the overtime budget.

Two unrelated defense attorneys contacted the DOC this month to express their appreciation for how easy the staff are to work with and how well the jail operation runs from their perspective; one stated

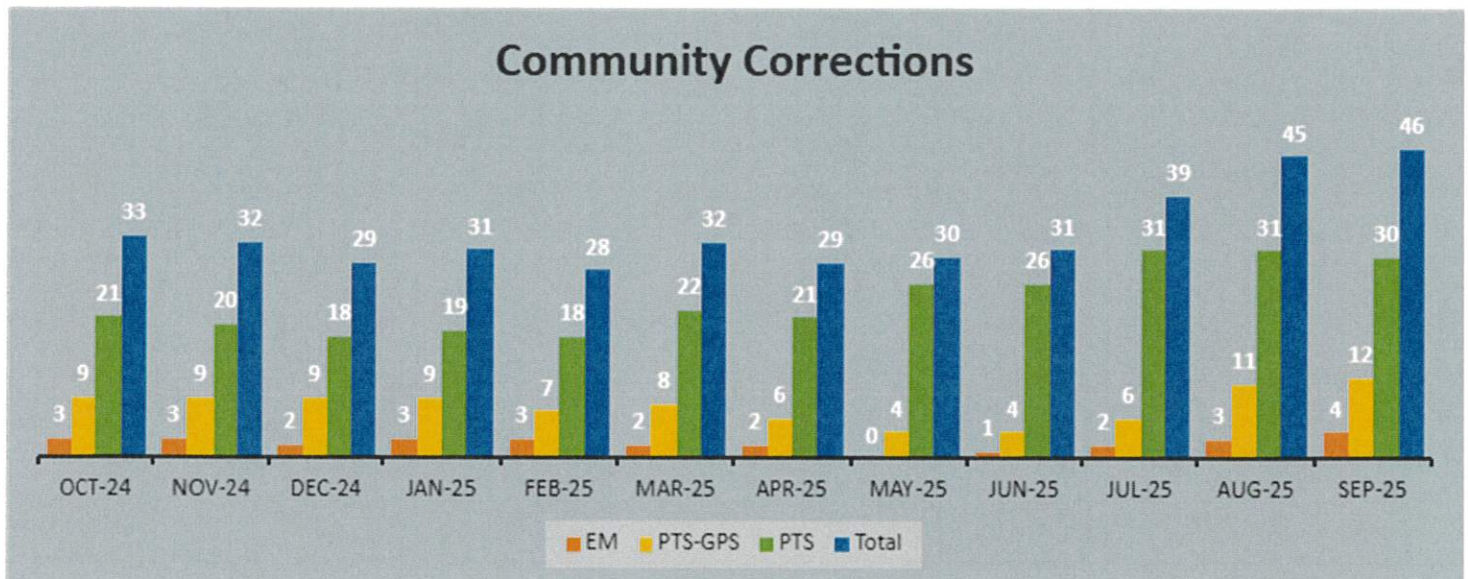
it was the best jail in the state. I am appreciative and proud of the officers and line supervisors whose daily diligent work earned this praise.

Community Corrections:

Inmates supervised on Electronic Monitoring: 4

Inmates on Pre-Trial Services with GPS: 12

Inmates on Pre-Trial Services supervised and checked by Community Corrections: 30



Community Corrections continues to supervise a large caseload of defendants and inmates in the community.

Staff:

New officer hires during the month: 0

New officer/supervisor vacancies during the month: 0

Total vacant officer positions at the end of the month (including supervisory rank): 3

Promotions during the month: 0

Significant Problems:

There were no significant problem incidents at the GCDoc in September. The continually growing census and associated inmate medical issues are a significant concern. The census continues to trend upwards and has already exceeded budget estimates. If the growth continues at the current rate, the GCDoc will have a fiscal crisis before the end of the budget year. The leadership team is working to minimize overtime, Medical is working to minimize out of the facility trips, and the Doc is cautious and conservative with all spending. However, the Doc has always been fiscally conservative and neither supervising inmates nor addressing medical emergencies are optional activities.

GRAFTON COUNTY PUBLIC SAFETY TRANSPARENCY INITIATIVE

Second Draft Packet – October 2025

Prepared and submitted by Alexandra Valliant – Woodsville, NH

Disclaimer: This packet is submitted for informational and public record purposes only. It is not intended as legal advice, nor does it represent binding policy. All citations, references, and attachments are drawn from publicly available materials as of October 2025.

EXECUTIVE SUMMARY

This packet is the second draft of the Grafton County Public Safety Transparency Initiative proposal, expanding on the original proposal for voluntary public reporting related to the Grafton County Sheriff's Office 287(g) Task Force Model agreement with ICE. It includes new documentation from DHS and ICE.gov outlining monetary incentives for participating agencies, a verified timeline compiled from Grafton County meeting minutes, sample data tables accompanying data methodology, additional figures, quick reference terms, operational flow charts and a transcript of the speech delivered before the Board on October 28, 2025. **The goal of this initiative remains unchanged: to establish a clear, cooperative framework for sharing non-identifiable, aggregate data and financial information related to Grafton County's 287(g) participation — promoting transparency, trust, and accountability.** This packet is submitted for public record and for consideration by the Grafton County Commissioners to review and potentially adopt the enclosed draft resolution and MOU as a framework for voluntary data transparency.

CONTENTS

Title Page 1

Legal Disclaimer 1

Executive Summary 2

Contents 3

Section I – Purpose and Context 4

Section II – Legal Context, County and State Structure 5

Section III – Public Access and Implementation Chronology 6-8

Section IV – Supporting Documentation ([DHS.gov](https://www.dhs.gov) / [ICE.gov](https://www.ice.dhs.gov)) 9-11

Appendix A – Draft Framework for Public Safety MOU 12

Appendix B – Proposed Resolution: Support of Public Safety Transparency Initiative 13

Appendix C – Full Speech Transcript 14-17

Appendix D – References and Source Citations 17

Appendix E – Sample Aggregate Data Tables 19-22

Appendix F – Data Methodology, Additional Notes, and Figures 22-28

SECTION I – PURPOSE AND CONTEXT

The purpose of this initiative is to promote clarity, trust, and accountability surrounding Grafton County's participation in the federal 287(g) program. **This effort does not seek to challenge GCSO's authority or operations**, but rather ensure that the public has access to clear, factual and non-identifiable data related to the program.

While the 287(g) agreement remains a point of concern for many residents, it is pertinent that public safety information be grounded in accurate information, rather than assumption or rumor. Establishing a cooperative framework for transparency allows the County and the Sheriff's Office to find common ground – balancing the community's right to know with law enforcement's need for operational discretion.

As a lifelong Grafton County resident, I believe that preserving fair transport times for our neighbors, securing training hours for our deputies and maintaining public trust are not opposing goals. This initiative reflects the understanding that transparency is an act of safety; when residents understand what their law enforcement is doing, they can better support and engage with them. Transparent aggregate reporting allows the County to address public concern, reduce rumor-driven fear, and demonstrate responsible administrative oversight without compromising active operations. By voluntarily releasing non-identifiable data and financial information (permitted under Section XIII of the 287(g) MOA,) **Grafton County can serve as a state leader in open, responsible, and cooperative public safety policy.**

SECTION II – LEGAL CONTEXT, COUNTY AND STATE STRUCTURE

Legal Context

Section XIII of the 287(g) MOA explicitly allows local agencies to communicate the substance of the agreement and share non-identifiable aggregate data. New Hampshire's SB 62(2025) prohibits local governments from restricting 287(g) participation, but it does not restrict voluntary public transparency. Aggregate reporting (totals, not identities) fully complies with DHS ICE 4300A privacy standards.

County Structure

New Hampshire sheriffs are independently elected; county commissioners manage fiscal and administrative oversight. A joint transparency initiative respects both jurisdictions by letting the sheriff provide data while the county hosts it publicly.

State Structure

Constitutional Foundation: N.H. Constitution, Part I, Article 8:

“All power residing originally in, and being derived from, the people, all the magistrates and officers of government are their substitutes and agents, and at all times accountable to them. Government, therefore, should be open, accessible, accountable and responsive. To that end, the public’s right of access to governmental proceedings and records shall not be unreasonably restricted.”

(Added by constitutional amendment in 1976; provides the foundational right of access to public records and meetings.)

Statutory Implementation: RSA 91-A:1 — Declaration of Purpose (Public Records and Meetings):

“Openness in the conduct of public business is essential to a democratic society. The purpose of this chapter is to ensure both the greatest possible public access to the actions, discussions and records of all public bodies, and their accountability to the people.”

Together, Part I, Article 8 of the New Hampshire Constitution and RSA 91-A:1 establish the legal basis for the public’s right to know, including access to aggregate governmental data, so long as disclosure does not violate statutory exemptions (e.g., personal privacy, security, or active investigations).

SECTION III – PUBLIC ACCESS AND IMPLEMENTATION CHRONOLOGY

KEY MILESTONES IN 287(g) ROLLOUT

On 1/8/25, Sheriff Myers is sworn in. January 8, 2025, Grafton County Commissioners Meeting Minutes Archives, p. 1 — <https://graffton-county.com/wp-content/uploads/2025/01/1.8.25.pdf>

On 1/14/25 Sheriff Myers is listed as “others”. January 14, 2025, Grafton County Commissioners Meeting Minutes Archives, p. 1 — <https://graffton-county.com/wp-content/uploads/2025/01/1.14.25.pdf>

On 1/21/25, “Sheriff Myers reported that they have been very proactive in the last nine (9) days she's been in office. The deputies are spending much more time on the road helping other towns, trying to mend relationships, and working on local partnerships.” No mention of federal partnerships underway. January 21, 2025, Grafton County Commissioners Meeting Minutes Archives, p. 2 — <https://graffton-county.com/wp-content/uploads/2025/01/1.21.25.pdf>

On 1/28/25, “Sheriff Myers discussed her thoughts on the funds and stated that she was looking at the possibility of hosting a drug trends training, as she has no training budget left. The Department of Corrections would be included, which could include outside agencies within the County. Supt. Lethbridge added that his training room at the DoC could accommodate at least 30 people for that type of training. Sheriff Myers noted she will be attending a meeting in a couple of weeks, and she could touch base with members of the FBI and others to discuss training opportunities to host at the County. Sheriff Myers stated that she is also looking to destroy drugs from their evidence room. There is a cost of roughly \$300 associated with that and she is not sure if these funds could be used for that.” No mention of 287(g). January 28, 2025, Grafton County Commissioners Meeting Minutes Archives, p. 3 — <https://graffton-county.com/wp-content/uploads/2025/02/1.28.25.pdf>

On 2/11/25, Sheriff is not listed as “others”. February 11, 2025, Grafton County Commissioners Meeting Minutes Archives, p. 1 — <https://graffton-county.com/wp-content/uploads/2025/02/2.11.25.pdf>

On 2/12/25, The MOA that GCSO signed was revised for the last time. Sheriff Myers had been in office for a little more than a month. February 12, 2025, Grafton County Commissioners Meeting Minutes Archives, p. 1 — <https://graffton-county.com/wp-content/uploads/2025/02/2.12.25.pdf>

On 2/18/25, “Sheriff Myers stated that she hopes to fill administrative positions by the month's end. She also reported that the Drug Task Force Program was cut from the proposed state budget. Grafton County has one (1) officer in the Drug Task Force, and that position will no longer be available at the end of June if that budget passes. She noted that there is talk of starting a new Northern Allegiance project for drug intervention, and there is \$2.5 million in the budget for that program, which includes Grafton County, Coos County, Sullivan County, and Carroll County. Sheriff Myers stated she is hosting her first Chief's meeting this morning and plans to discuss this with them.” No mention of 287(g). February 18, 2025, Grafton County Commissioners Meeting Minutes Archives, p. 2 — <https://graffton-county.com/wp-content/uploads/2025/02/2.18.25.pdf>

On 2/25/25, Sheriff is not listed as “others”. February 25, 2025, Grafton County Commissioners Meeting Minutes Archives, p. 1 — <https://graffton-county.com/wp-content/uploads/2025/03/2.25.25.pdf>

On 3/4/25, Sheriff is not listed as “others”. March 4, 2025, Grafton County Commissioners Meeting Minutes Archives, p. 1 — <https://graffton-county.com/wp-content/uploads/2025/03/3.4.25.pdf>

On 3/5/25, Sheriff Myers signed the MOA. March 5, 2025, ICE 287(g) MOA — Grafton County Sheriff's Office (Task Force Model), p. 9 — https://www.ice.gov/doclib/287gMOA/GraftonCoNH_TFM_MOA_03.07.2025.pdf

On 3/7/25, ICE Acting Director Caleb Vitello signed the MOA. March 7, 2025, ICE 287(g) MOA — Grafton County Sheriff's Office (Task Force Model), p. 9 — https://www.ice.gov/doclib/287gMOA/GraftonCoNH_TFM_MOA_03.07.2025.pdf

On 3/11/25, Sheriff is not listed as "others". March 11, 2025, Grafton County Commissioners Meeting Minutes Archives, p. 1 — <https://grafton-county.com/wp-content/uploads/2025/03/3.11.25.pdf>

On 3/18/25, After news breaks on NH Public radio that Sheriff Myers had signed the MOA; Meeting minutes recount that Commissioner Piper states:

"Sheriff Myers feels she lacks adequate training funding and is happy to have her deputies receive any additional training she can get. ...because it will help them meet their state standards for in-service training, which is not in their budget. Commissioner McLeod stated the Commissioners did know about the training needs and no one asked them for additional funding. CA Libby stated that they could have addressed the issue of training money." March 18, 2025, Grafton County Commissioners Meeting Minutes Archives, p. 2 — <https://grafton-county.com/wp-content/uploads/2025/03/3.18.25.pdf>

"... these are allegedly justice-involved people the Sheriff's Department encounters during their normal process. Safety is also important for Sheriff Myers, which is why she wants the training for her Deputies; the length of time someone is detained is also important to her. The Sheriff's Department will not be aggressively going out searching for immigrants." March 18, 2025, Grafton County Commissioners Meeting Minutes Archives, p. 3 — <https://grafton-county.com/wp-content/uploads/2025/03/3.18.25.pdf>

On 3/20/25, The Sheriff presents the GCSO budget, and answers direct questions about 287:

"Commissioner Hedberg... asked if Sheriff Myers had considered the costs associated with that agreement. Sheriff Myers stated that she signed this contract so that her staff would be trained in case an event does happen with an undocumented person. She does not anticipate any additional expense... Sheriff Myers explained that she is not trying to take people. ICE is going to come in regardless, and this contract will allow them to be involved and receive training on how ICE operates if they do come into our area." March 20, 2025, Grafton County Commissioners Meeting Minutes Archives, p. 2 — <https://grafton-county.com/wp-content/uploads/2025/03/3.20.25.pdf>

On 3/25/25, "Commissioner Piper stated that she is authentically seeking factual information so she can represent her constituents. She noted that the overwhelming majority of constituents she heard from are members of the party to which she belongs, but she represents all residents of Lebanon, Hanover, and Enfield. She understands the frustration, and she is sorry for it. She appreciates Commissioner Hedberg's efforts to find information." March 25, 2025, Grafton County Commissioners Meeting Minutes Archives, p. 3 — <https://grafton-county.com/wp-content/uploads/2025/04/3.25.25.pdf>

"Sheriff Myers stated that the ICE incidents that are shown on the news are giving them a bad reputation. She stated that they may be able to help correct that reputation by participating in this program." March 25, 2025, Grafton County Commissioners Meeting Minutes Archives, p. 4 — <https://grafton-county.com/wp-content/uploads/2025/04/3.25.25.pdf>

"Sheriff Myers further stated that she understands that people see this as a negative thing for the County. They are doing it from a law enforcement standpoint and not a party line. They are doing it because they are the County asset, when another law enforcement agency needs their help. They are going to do what is right and not violate any civil rights." March 25, 2025, Grafton County Commissioners Meeting Minutes Archives, p.

4 — <https://graffon-county.com/wp-content/uploads/2025/04/3.25.25.pdf>

On 4/24/25, “CA Libby stated that she learned that SB62 passed the Senate and yesterday passed the House Criminal Justice Committee. The bill states that neither the State or County, municipalities or other political subdivision of the state shall prohibit or impede any State, County or local law enforcement agency from applying for entry or entering into agreement with the United States Immigration and Customs Enforcement to participate in the federal 287:g program. Commissioner McLeod stated that she wished they would have known this before they agreed on the budget or she would have pushed again to reduce the Sheriff’s budget by the amount it costs to participate in the MOA. CA Libby stated that if the bill passes there is nothing the Commissioners can do with the contract. Commissioner McLeod asked CA Libby to check with legal counsel and ask if the Commissioners cannot prohibit the contract, do they have to fund it.

Commissioner Piper stated that it seems dangerous to not adequately fund the Sheriff’s Department.” April 24, 2025, Grafton County Commissioners Meeting Minutes Archives, p. 4 — <https://graffon-county.com/wp-content/uploads/2025/05/4.24.25-Budget.pdf>

SECTION IV – SUPPORTING DOCUMENTATION (DHS / ICE.GOV)

287(g)

Benefits



**U.S. Immigration
and Customs
Enforcement**

Your Agency + Federal Law Enforcement = SAFER COMMUNITIES

ICE's **287(g) Program** empowers your law enforcement agency to enforce some aspects of U.S. immigration law to make your community safer. Under this program's designated authorities, your agency can:

- ▶ **Identify** and process removable aliens with pending or active criminal charges.
- ▶ **Enforce** limited immigration law with ICE oversight during routine duties.
- ▶ **Serve** and execute administrative warrants on aliens in your jail.

287(g) Benefits:

- ▶ Enhanced public safety
- ▶ Free training
- ▶ Possible eligibility for federal payments through a DOJ program

How to Sign Up for the 287(g) Program:

- ▶ Complete a signed letter of interest.
- ▶ Fill out a memorandum of agreement for the program model you want to use.
- ▶ Submit your letter of interest and memorandum of agreement to **ERO287g@ICE.dhs.gov**.

3 WAYS Your Agency Can Join Forces With ICE

Jail Enforcement Model	Task Force Model	Warrant Service Officer Program
Allows your officers to identify and process removable aliens who have pending or active criminal charges.	Allows your officers to identify and report suspected aliens not charged with crimes (under ICE oversight) and exercise limited immigration authority on ICE-led task forces.	Allows your officers to serve and execute administrative warrants on aliens in your custody.

▶ These programs are only available to officers and agencies with signed MOAs with ICE.

Task Force Model Reimbursement Plan Benefits

If LEAs sign the TFM MOA before Oct 1, 2025, they will receive:

- ▶ \$7,500 for equipment per trained TFO
- ▶ \$100,000 for new vehicles per MOA
- ▶ Salary and benefits reimbursed per trained TFO
- ▶ Overtime funds up to 25% of salary



Figure 2. U.S. Immigration and Customs Enforcement – 287(g) Program Models and Benefits Overview. (September 2025).

Reproduced directly from U.S. Immigration and Customs Enforcement (ICE.gov) for public informational use.

Starting **October 1, 2025**, participating law enforcement will have these reimbursement opportunities:

- ICE will fully reimburse participating agencies for the **annual salary and benefits** of each eligible trained 287(g) officer, including overtime coverage up to 25% of the officer's annual salary.
- **Law enforcement agencies** will be eligible for quarterly monetary performance awards based on the successful location of illegal aliens provided by ICE and overall assistance to further ICE's mission to Defend the Homeland:
 - 90% - 100% - \$1,000 per eligible task force officer
 - 80% - 89% - \$750 per eligible task force officer
 - 70% - 79% - \$500 per eligible task force officer

Figure 1. Department of Homeland Security – 287(g) Incentive & Reimbursement Overview (October 2025).

Reproduced directly from the Department of Homeland Security (DHS.gov) for public informational use.

“TRANSPARENCY AT THE DEPARTMENT OF HOMELAND SECURITY”

“SUPPORTING INCREASED PUBLIC ACCESS TO THE RESULTS OF RESEARCH”

“DHS recognizes that increased access to research data and information can encourage research collaboration and help successfully address the nation’s constantly evolving homeland security challenges. Increased access to releasable results of DHS research promotes development of a Homeland Security-related industrial base, increases the credibility of associated program managers, subject matter experts, researchers, contracted developers, sponsors and stakeholders in the scientific community.” U.S. Department of Homeland Security. *Transparency | Supporting Increased Public Access to the Results of Research*. Retrieved from <https://www.dhs.gov/transparency>

APPENDIX A – DRAFT FRAMEWORK FOR PUBLIC SAFETY MOU

Between the Grafton County Board of Commissioners and the Grafton County Sheriff's Office

Purpose:

To formalize a voluntary, cooperative agreement to share non-identifiable, aggregate public safety data and program information related to Grafton County's participation in the federal 287(g) Task Force Model with Immigration and Customs Enforcement (ICE).

Framework:

- The Sheriff's Office retains full operational control of all data provided.
- The County's role is limited to hosting, maintaining, and publishing information that is non-identifiable and compliant with Section XIII of the 287(g) MOA.
- The shared information shall include:
 - The 287(g) MOA and related documents;
 - Plain-language fact sheets and program descriptions, and;
 - Quarterly totals of, but not limited to:
 - ICE transfers, non citizen detentions, and/or reimbursements;
 - Monetary incentives or reimbursements received through DHS or ICE;
 - Notations of any data categories declined by the Sheriff's Office; and
 - Aggregate data on all non-citizen detentions, arrests, and transfers prior to 287(g).

Conditions:

- All shared data shall be strictly aggregate and non-identifiable.
- The Sheriff's Office may withdraw or modify participation at any time.
- The Commissioners' Office shall ensure that published materials accurately reflect data as reported by GCSO, with no interpretive commentary.
- Both parties agree to maintain ongoing communication to ensure transparency, accuracy, and compliance.

Duration:

This Memorandum shall take effect upon signature by both parties and remain in effect until amended or withdrawn by mutual consent.

Signatures:

_____ Sheriff, Grafton County Sheriff's Office
Chair, Grafton County Board of Commissioners
Date

APPENDIX B – PROPOSED RESOLUTION: SUPPORT OF PUBLIC SAFETY TRANSPARENCY INITIATIVE

GRAFTON COUNTY BOARD OF COMMISSIONERS

Resolution No. 2025-XX

Establishing the Grafton County Public Safety Transparency Initiative

WHEREAS, the Grafton County Sheriff's Office entered into a 287(g) Task Force Model Memorandum of Agreement with Immigration and Customs Enforcement on March 7, 2025; and

WHEREAS, Section XIII of that federal MOA permits local law enforcement agencies to communicate the substance of the agreement and share non-identifiable, aggregate data with the public; and

WHEREAS, transparency and public access to information are essential to maintaining trust, accountability, and integrity in law enforcement; and

WHEREAS, the Sheriff's Office and the Board of Commissioners share a common commitment to accuracy, clarity, and public understanding regarding county participation in federal programs; and

NOW, THEREFORE, BE IT RESOLVED, that the Grafton County Board of Commissioners hereby establishes a voluntary Public Safety Transparency Initiative, in cooperation with the Grafton County Sheriff's Office, to publish non-identifiable, aggregate data and program information related to the 287(g) agreement; and

BE IT FURTHER RESOLVED, that this initiative shall include:

- Public posting of the 287(g) MOA and plain-language explanations of the program,
 - Routine publication of aggregate statistics (ICE transfers, detentions, and reimbursements),
 - Disclosure of any monetary incentives or reimbursements received through DHS or ICE, and
 - Aggregate data on all non-citizen arrests, detentions or transfers prior to 287(g); and
- Notation of any data categories declined for release by the Sheriff's Office; and

BE IT FINALLY RESOLVED, that Grafton County shall serve as a model for transparency and cooperative governance in the State of New Hampshire by voluntarily providing factual, aggregate data to residents in accordance with all applicable laws, policies, and ethical standards of public service.

Adopted this ____ day of _____, 2025, by the Grafton County Board of Commissioners.

Chair, Grafton County Board of Commissioners

Commissioner

Commissioner

Sheriff, Grafton County Sheriff's Office

APPENDIX C – FULL SPEECH TRANSCRIPT

1. Opening (introduce yourself)

So, that is a little bit about why I am here, but who am I? I am a local from Haverhill, I've lived in Woodsville my whole life. About a year and a half ago, I started work in the field of Applied Behavior Analytics, but I've spent the last 11 years bartending in the North Country.

Working between Woodsville, NH, Littleton, NH and Bradford, VT, I have listened to a lot of folks who like to talk politics at the bar — a topic any seasoned bartender avoids like the plague. However, while I bartended at the 99 in Littleton, when Sheriff Myers' campaign would come up in conversation, as it did because of her time as a Littleton officer, I would always make an exception to my rule by adding that, "I think she is a great choice. She will be tough, but she will do a good job." And I just want to make sure the Commissioners and the Sheriff know, I do genuinely believe that to be true before I go on.

Now, I want to fast forward from her campaign to news breaking of the 287(g) agreement. Signed behind closed doors. Less than one hundred days into the new term. It immediately raised concern.

After combing through meeting minutes and lists of 287(g) participating agencies, I finally uncovered the MOA and learned GCSO signed on to the ICE Task Force Model. The final revision of the MOA occurred only a little more than one month after the Sheriff was sworn in. Additionally, 36 days — and 5 Commissioner's meetings, pass between the last revision of the MOA on February 12th, and the first time meeting minutes reference it on March 18th. One week later, on March 25th, 14 out of 17 people who spoke on public record had questions about, or outright disavowed, the MOA.

Kate Plumley Stewart, of Enfield, asked:

"(6) what Grafton County data supports the need to sign on to 287(g)?

(7) How frequently do you detain and report any party to the federal government?

(12) Why should you not establish an internal policy to standby to ensure the safety of Grafton County locals?

(13) Why did the Sheriff's office sign on so early? I see no logic or data that Grafton County should be an early adopter." Grafton County Board of Commissioners. (2025, March 25). Meeting minutes (pp. 7–8). North Haverhill, NH: Author. Retrieved from the Minutes Archives.

Seven months later, these questions still go unanswered.

Since GCSO signed the MOA, Dartmouth College has come under pressure from this administration to sign the Compact for Academic Excellence. As of 10 days ago, they officially turned it down. As of a few days ago, our neighbors across the Connecticut River have been denied federal aid for flood relief. The twin states, and Grafton County specifically, are now under federal scrutiny. Given the retaliatory practices the federal government has demonstrated under this administration, I'm here today to speak about public transparency regarding Grafton County's participation in the federal 287(g) program with ICE."

JM

2. Define the issue

As of right now, there's no public information on either GCSO website, or the County website, about this agreement, what it entails, financial incentives, or what kind of non-identifiable data is collected. Residents who want to understand how this partnership operates have no clear place to look, and that creates

unnecessary confusion and fear — especially when the program itself allows local agencies to share aggregate data.



3. Reference the 287(g) MOA

Section XIII of the MOA explicitly states that a local law-enforcement agency may communicate the substance of the agreement to the media or public. It also allows sharing of non-identifiable statistics — such as the monthly total of non-citizens detained or transferred to ICE; and does not prohibit routine sharing of financial incentives awarded through DHS and ICE. So, in other words, the MOA explicitly permits the kind of transparency this proposal encourages.



4. Offer your solution

I'm here today proposing a joint Public Safety Transparency Initiative — a simple webpage hosted by the County that routinely publishes that data. A totally voluntary sharing of non-identifiable data.

The Sheriff's Office would retain full operational control of numbers and statistics provided, at their discretion, as is their right; the County would simply host the information in a way that's accessible to the public. This portal will not include data on pending investigations or active enforcement operations.

This kind of transparency benefits everyone — it builds trust, reduces rumors, and demonstrates accountability. It is my recommendation that the final draft memorandum be explicit — the public should have easy access to information and non-identifiable, aggregate data relating to 287(g), such as:

1. the MOA, plain language fact brochures, program incentives and;
2. aggregate data totals including, but not necessarily limited to: ICE transfers, non-citizen arrests and/or detentions (if totals are 0 or less than 1, the graphs and/or tables represent that accurately) and;
3. monetary incentives, bonuses, payouts, and/or reimbursements through 287(g) updated, quarterly and/or annually (if \$0, the graphs and/or tables represent that accurately) and;
4. accurate historical aggregate data about non-citizen detentions, arrests, and transfers prior to the MOA, and;
5. should the Sheriff decline any data set, as is their right, the graphs and/or tables denote these actions plainly.

Through cooperative collaboration, the public can glean necessary safety information about ICE's mission in Grafton County, without violating the MOA. As of October 1st, DHS awards quarterly monetary incentives — hundreds per eligible officer — for the "successful location of illegal aliens provided by ICE and overall assistance to further ICE's mission"

90% - 100% - \$1,000 per eligible task force officer
80% - 89% - \$750 per eligible task force officer
70% - 79% - \$500 per eligible task force officer

Figure 3. Department of Homeland Security – 287(g) Incentive & Reimbursement Overview (October 2025).

I want to clarify that I am not recommending the Sheriff's office provide their own overall assistance rate; I am simply requesting the dollar amount awarded, if any, be public knowledge.

3M

5. Reference your materials

Next, I want to draw your attention to the initial 3 page summary I provided you with.

I will mention the correction to the precedent listed on page 2 of that summary. I would like to go on record today, that I do not think there is clear precedent for this framework. On a national scale, maybe some agencies are publishing their own data. However, I could only easily locate third-party summary data. This is not made clear in my first draft or revision.

Moreover, I could not locate any public data for New Hampshire. This information should not be hard to find, and it is all of our right to electively come together for the sake of greater public safety transparency. That is the whole point here. After considering SB62 and the MOA, I simply think this framework is permissible. As we have all heard, these are unprecedented times. My hope is Grafton County can lead the state in upholding our constitutional values by setting a clear, factual model for transparency around immigration-related cooperation.

Moving on to the more in depth second draft; you find plain language documentation from DHS and ICE websites about the 287(g) program; a timeline of events corroborated via meeting minutes; sources; a transcript of this speech, and; a sample data table, supplemented with notes. You will also find a sample Memorandum of Understanding and a companion Resolution that outline how the Commissioners and Sheriff could formalize this collaboration. This proposal is simply a draft, offering a potential framework for a public safety initiative. I'm not a lawyer, or a lawmaker; I would expect the next step of this proposal, if it were to move forward, could include changes to the draft MOU that the Commissioners and GCSO see fit, and hopefully, the recommendations I have listed today.

3M

6. Make your ask

The Sheriff has told me, there have not been any ICE arrests in Grafton County, and she would update her website to include the MOA and any arrests, should any arise. I commend her willingness, and timely response. However, it is unlikely that the 88,000 residents of Grafton county have the time or ability to deep dive into the complex jargon of this MOA. At the beginning of the year, GCSO introduced a quarterly reporting framework; this initiative ties easily into the already established routine sharing of some aggregate data, unrelated to 287(g).

Opponents will protest: "the extent of this initiative is overkill." However, this framework costs the county nothing, uses existing data already compiled under ICE reporting protocols, and requires no additional labor beyond periodic data upload. The time to adopt a voluntary and collaborative public safety initiative is now, while the data sets are still small and manageable. Furthermore, voluntarily disclosed aggregate data, numbers — not names, will help disarm residents who feel blindsided by this agreement. I am asking that the Commissioners review this proposal and consider adding something like it to a future agenda for discussion

with the Sheriff.

“Commissioner Piper stated that she is authentically seeking factual information so she can represent her constituents... residents of Lebanon, Hanover, and Enfield” March 25, 2025, Grafton County Commissioners Meeting Minutes Archives, p. 3 — <https://graffton-county.com/wp-content/uploads/2025/04/3.25.25.pdf>

“Sheriff Myers stated that the ICE incidents that are shown on the news are giving them a bad reputation. She stated that they may be able to help correct that reputation by participating in this program.” March 25, 2025, Grafton County Commissioners Meeting Minutes Archives, p. 4 — <https://graffton-county.com/wp-content/uploads/2025/04/3.25.25.pdf>

As of October 2025, NH agencies have MOAs and press notices, but I could not find anyone publishing routine aggregate data. This initiative would make Grafton the first in the state.



7. Close

Transparency isn't just about numbers — it's about trust and accountability.

In closing, I would like to remind the group of a few core values, listed on GCSO's homepage:

“Integrity- Holding our co-workers and ourselves in this organization accountable to *high ethical standards* while serving as role models for trust, honesty and respect.

Honor- Being accountable for our values by representing the citizens *and visitors* of Grafton County in a professional and caring manner.

Courage- Standing up to challenges, both physically and morally. Ensuring we *do what is right* to protect the people we swore an oath to protect.”

These values remind me of a poster that was hung on the walls, way back when I was a student at Woodsville High School, “integrity is what you do when no one is looking.” So far, there has been a concerning gap between GCSO's actions with 287(g), and the public's right to know. Please consider these core values when reflecting on this voluntary and collaborative approach to informative immigration policy and public safety.

Thank you very much for your time and for your service to Grafton County residents. I'll provide CA Libby with a digital copy of my speech today, supplemental documentation and references for review, and/or to be added to the public record.

APPENDIX D – REFERENCES AND SOURCE CITATIONS

Grafton County Minutes Archive links (clickable in Timeline):

- 1/8/25 Minutes – <https://graffton-county.com/wp-content/uploads/2025/01/1.8.25.pdf>
- 1/14/25 Minutes – <https://graffton-county.com/wp-content/uploads/2025/01/1.14.25.pdf>
- 1/21/25 Minutes – <https://graffton-county.com/wp-content/uploads/2025/01/1.21.25.pdf>
- 1/28/25 Minutes – <https://graffton-county.com/wp-content/uploads/2025/02/1.28.25.pdf>
- 2/11/25 Minutes – <https://graffton-county.com/wp-content/uploads/2025/02/2.11.25.pdf>
- 2/12/25 (MOA note) – MOA – Grafton County Sheriff's Office (Task Force Model), signed March 5–7, 2025 –

https://www.ice.gov/doclib/287gMOA/GraftonCoNH_TFM_MOA_03.07.2025.pdf

- 2/18/25 Minutes – <https://grafton-county.com/wp-content/uploads/2025/02/2.18.25.pdf>
- 2/25/25 Minutes – <https://grafton-county.com/wp-content/uploads/2025/03/2.25.25.pdf>
- 3/4/25 Minutes – <https://grafton-county.com/wp-content/uploads/2025/03/3.4.25.pdf>
- 3/11/25 Minutes – <https://grafton-county.com/wp-content/uploads/2025/03/3.11.25.pdf>
- 3/18/25 Minutes – <https://grafton-county.com/wp-content/uploads/2025/03/3.18.25.pdf>
- 3/20/25 Minutes – <https://grafton-county.com/wp-content/uploads/2025/03/3.20.25.pdf>
- 3/25/25 Minutes – <https://grafton-county.com/wp-content/uploads/2025/04/3.25.25.pdf>
- 4/24/25 Minutes – <https://grafton-county.com/wp-content/uploads/2025/05/4.24.25-Budget.pdf>

ICE/DHS documents:

- ICE 287(g) - Fact Sheet 287(g) Benefits
<https://www.ice.gov/doclib/about/offices/ero/287g/factsheet287gBenefits.pdf>
- DHS Announcement – 287(g) Reimbursement Opportunities (Oct 1, 2025) – <https://www.dhs.gov>

Disclaimer: This packet is submitted for informational and public record purposes only. It is not intended as legal advice, nor does it represent binding policy. All citations, references, and attachments are drawn from publicly available materials as of October 2025.

APPENDIX E – SAMPLE AGGREGATE DATA TABLES

A. ICE Coordination and Transfers

Reporting Period	GCSO Notifications Issued to ICE	GCSO Transfers Accepted by ICE	GCSO Transfers Declined/Rejected by ICE	Joint ICE Task Force Operations	ICE Requests for Assistance	ICE Requests for Assistance	ICE Requests for Assistance

				(Aggregat e Total)	Received by GCSO	Accepted by GCSO	Declined by GCSO
Q1 FY 2025 (Jan- Mar)							
Q2 FY 2025 (Apr- Jun)							
Q3 FY 2025 (Jul- Sept)							
Q4 FY 2025 (Oct- Dec)							
Annual Total	[sum]						

B. Local Enforcement Data (Non-Citizens)

Reporting Period	Non-Citizen Arrests (Local Jurisdiction)	Non-Citizen Detentions (ICE- related)	Non-Citizen Temporary Holding
Q1 FY 2025 (Jan-Mar)			
Q2 FY 2025 (Apr-Jun)			
Q3 FY 2025 (Jul-Sept)			
Q4 FY 2025 (Oct-Dec)			

C. Case and Outcome Metrics

Reporting Period	Average Detention Duration (Days)	ICE Warrant Assist Events	ICE Verification Queries Submitted	Referrals to Federal Custody	Detainer Request Received
Q1 FY 2025 (Jan-Mar)					
Q2 FY 2025 (Apr-Jun)					
Q3 FY 2025 (Jul-Sept)					
Q4 FY 2025 (Oct-Dec)					

D. Public Safety and Oversight Metrics

Reporting Period	Total Number of Deputies Trained under 287(g)	Training Hours Completed (ICE Sponsorers)	Community Notifications or Outreach Sessions	Civil Rights Complaints Received/Resolved	Data Categories Declined for Publication
Q1 FY 2025 (Jan-Mar)					
Q2 FY 2025 (Apr-Jun)					
Q3 FY 2025 (Jul-Sept)					
Q4 FY 2025 (Oct-Dec)					

E. Historical Aggregate Data- Non- Citizen Arrests, Detentions, and Transfers (Pre-MOA Baseline)

Reporting Period (Year/Quarter)	Non-Citizen Arrests (Local Jurisdiction)	Non-Citizen Detentions (Local Holding)	ICE Notifications/Referrals	ICE Transfer Accepted	ICE Transfers Declined/ No Action
FY 2022 (Jan-Dec)					

FY 2023 (Jan-Dec)					
Q1 FY 2024 (Jan-Mar)					
Q2 FY 2024 (Apr-Jun)					
Q3 FY 2024 (Jul-Sept)					
Q4 FY 2024 (Oct-Dec)					
Pre-MOA Average (FY 2022-FY2024)					

F. Grafton County Sheriff Office 287(g) Financial Incentives and Reimbursements

Reporting Period	Total ICE reimbursements (all categories)	Training Reimbursements	Equipment Reimbursements	Vehicle Reimbursements	Salary Reimbursements	Overtime Reimbursements	Quarterly Officer Incentive Payments	Total Officers Eligible	Reimbursement Source (DHS/ICE)
Q1 FY 2025									
Q2 FY 2025									
Q3 FY 2025									
Q4 FY 2025									
Annual Total 2025									

APPENDIX F – DATA METHODOLOGY AND ADDITIONAL NOTES

A. ICE Coordination and Transfers

1. **GCSO Notifications Issued to ICE** – Refers to informational communications sent by GCSO to U.S. Immigration and Customs Enforcement (ICE) regarding the custody, release, or booking of an individual potentially subject to immigration review. Notifications may occur automatically through DHS databases or manually through ICE contact channels. Includes all informal coordination (phone calls, verbal). Figures represent aggregate, non-identifiable totals of notifications transmitted during the reporting period. No personal identifiers, case details, or active investigations are disclosed. *See Figure 1, end of appendix.*
2. **GCSO Transfers Accepted by ICE** – Refers to instances in which GCSO transferred physical custody of an individual to the U.S. Immigration and Customs Enforcement (ICE) under the 287(g) Task Force Model. A “transfer accepted” is counted when ICE takes custody of an individual following a detainer, referral, or formal handoff request. Figures represent aggregate total of transfers from GCSO to ICE custody during reporting period; excludes pending or declined retainers.
3. **GCSO Transfers Declined/ Rejected by ICE** – Refers to instances where ICE was notified of an individual eligible for transfer but under the 287(g) agreement did not assume custody. A “declined transfer” includes cases where ICE explicitly declined, the hold expired, or no federal warrant or priority match was confirmed. Figures represent aggregate data, non-identifiable totals only.
4. **Joint ICE Task Force Operations (Aggregate Total)** – Refers to total number of joint field *or* enforcement operations conducted in cooperation between GCSO and U.S. Immigration and Customs Enforcement (ICE) under the 287(g) Task Force Model. This is a Multi-Agency Approach that uses information and resource sharing to target criminal networks. This category includes instances where GCSO personnel provided assistance, security, transport, or administrative coordination as part of an ICE-initiated task force activity. Figures represent aggregate, non-identifiable totals only and exclude any operational details that could compromise privacy safety or ongoing investigations.
5. **ICE Requests for Assistance Received by GCSO** – Refers to formal or informal requests made by U.S. Immigration and Customs Enforcement (ICE) to the GCSO for operational, administrative, or informational support under the 287(g) Task Force Model. Requests may include participation in joint operations, warrant assists, transport coordination, or data verification. Figures represent the total aggregate number of requests from ICE for local coordination or information, including both accepted and denied. *See Figure 2, end of appendix.*
6. **ICE Requests for Assistance Accepted by GCSO** – Refers to assistance requests from ICE that GCSO approved and participated in, in whole or in part. Acceptance includes actions such as field deployment, administrative coordination, or information exchange. Figures represent aggregate totals only, excluding operational details or case identifiers.
7. **ICE Requests for Assistance Declined by GCSO** – Refers to assistance requests from ICE that GCSO declined, deferred or did not fulfill. Declinations may occur due to jurisdictional limitations, staffing constraints, or determinations that the request fell outside local authority. Figures represent aggregate totals per reporting period. Declining assistance does not constitute non-compliance under the 287(g) agreement.

A1-7 Sources: U.S. Immigration and Customs Enforcement (ICE), *Delegation of Immigration Authority – Section 287(g) Immigration and Nationality Act*, updated October 1, 2025. [ICE.gov](https://ice.dhs.gov), Congressional Research

Service (CRS), *The 287(g) Program: State and Local Immigration Enforcement, IF11898 (August 12, 2021). [congress.gov](https://www.congress.gov) (operational models, notifications and transfer references.)*

B. Local Enforcement Data (Non-Citizens)

8. **Non-Citizen Arrests (Local Jurisdiction)** – Refers to criminal arrests under New Hampshire or municipal law who were later confirmed as non-citizens. Data includes arrests or detentions initiated by local departments and processed through GCSO systems. Figures exclude ICE-initiated arrests, immigration specific detentions, and any ongoing investigations. Totals are aggregate, non-identifiable and reported retrospectively for transparency under Section XIII of the 287(g) MOA.
9. **Non-Citizen Detentions (ICE Related)** – Refers to extended custody of a non-citizen individual held by GCSO at ICE's request under a detainer (Form I-247A); may last up to 48 hours beyond local release under federal coordination. All totals are aggregate and non-identifiable.
10. **Non-Citizen Temporary Holding** – Refers to temporary custody of a non-citizen individual by the GCSO for administrative or safety reasons, or pending coordination with federal partners. Such holdings are short-term in nature (typically less than 24 hours) and occur *prior* to the issuance of any ICE detainer or transfer request. Figures represent aggregate, non identifiable totals of short-term custody events per reporting period.

B8-10 Sources: ICE, *Delegation of Immigration Authority – Section 287(g)* (updated October 1, 2025), **New Hampshire Revised Statutes § 594:10 (“Arrest Without a Warrant”)RSA 594:11 (“Judge’s Order to Arrest”)** (*Establishes that “non-citizen arrests” refer to criminal, not civil, enforcement.*)

C. Case and Outcome Metrics

11. **Average Detention Duration (Days)** –Average detention duration metrics are derived from GCSO jail custody logs and ICE detainer tracking reports. Reported figures represent mean detention lengths for ICE-related holds and are published in aggregate, non-identifiable form in compliance with Section XIII of the 2025 GCSO-ICE 287(g) MOA.
12. **ICE Warrant Assist Events** – Refers to instances in which the Grafton County Sheriff's Office provided support to U.S. Customs Enforcement (ICE) in the service or execution of a federal administrative or criminal immigration warrant under the 287 (g) Task Force Model. Assistance may include logistical, security, or custody support. Figures represent aggregate, non-identifiable totals per reporting period. No specific dates, locations, or individual information are disclosed. GCSO may disclose the type of support category: logistical/security/custody.
13. **ICE Verification Queries Submitted** – Number of immigration-status checks submitted by GCSO to ICE's Law Enforcement Support Center, or related databases, during the reporting period. Figures are aggregate, non-identifiable, and represent completed administrative queries only. Totals are reported retrospectively on a quarterly basis and exclude any queries tied to ongoing investigations at the time of reporting.
14. **Referrals to Federal Custody** – Refers to instances in which GCSO officially referred (official record) a federal agency – including U.S. Immigration and Customs Enforcement (ICE), the U.S. Marshals Service, or Department of Homeland Security – that an individual in local custody may be eligible for federal detention, removal or prosecution. Figures represent aggregate, non-identifiable totals per

reporting period. These counts include referrals that resulted in transfer as well as those declined, or pending at the time of referral. No identifying details, locations, or ongoing cases are disclosed.

15. **Detainer Requests Received** – Refers to formal written requests (Form I-247A) from U.S. Immigration and Customs Enforcement (ICE) asking GCSO to maintain custody of a non-citizen for up to 48 hours beyond their local release date, to allow ICE to assume custody. Figures represent aggregate, non-identifiable totals of detainer requests received within each reporting period. Outcomes of these requests (honored, declined or expired) are tracked separately. No individual identifiers, arrest details, or active cases are disclosed.

C11-15 Sources: U.S. Immigration and Customs Enforcement, *“Delegation of Immigration Authority – Section 287(g) Immigration and Nationality Act,”* ICE.gov, updated October 1, 2025. ICE ERO Performance Work Statement 2022; 8 C.F.R. § 287.7(d) (*Defines detention-duration and verification procedures.*)

D. Public Safety Oversight Metrics

16. **Total Deputies Trained under 287(g)** – Refers to GCSO deputies who have completed the formal U.S. Immigration and Customs Enforcement (ICE) 287(g) Task Force training and hold certification to perform delegated immigration enforcement functions under federal supervision. No individual names, ranks, or assignment details are disclosed.
17. **Training Hours Completed (ICE-Sponsored)** – Refers to the cumulative total of instructional hours completed by GCSO personnel under U.S. Immigration and Customs Enforcement (ICE) sponsorship as part of the 287(g) Task Force Program. This includes initial certification, annual requalification, civil-rights instruction, database access training, and any other ICE-provided continuing education directly related to delegated immigration functions. Figures represent aggregate, non-identifiable totals of training hours completed within each reporting period.
18. **Community Notifications or Outreach Sessions** – Refers to formal communications, publications, or events conducted by GCSO to inform the public about the 287(g) agreement, related to activities, and community safety issues. This includes official website updates, press releases, informational packets, and public meetings and forums. Figures represent aggregate counts per reporting period; no identifying information about participants is disclosed.
19. **Civil Rights Complaints Received/Resolved** – Refers to formal or informal complaints alleging civil-rights violations connected to GCSO participation in the 287(g) Task Force Model. Complaints may originate from individuals, advocacy groups, or oversight agencies (ICE Office of Professional Responsibility or DHS Office for Civil Rights and Civil Liberties).
20. **Data Declined for Publication** – Refers to total count of any instance where the Sheriff’s Office, under its discretionary authority, elects not to publish or partially redact figures for data categories otherwise included in this transparency framework. These instances are logged by category and reporting period, with notations identifying where aggregate data has been withheld or summarized. All decisions are consistent with the 287(g) MOA and the Sheriff’s retained right to determine data release.

D16-20 Sources: 287(g) MOA § V (Supervision); U.S. Department of Homeland Security, *287(g) Program Memorandum of Agreement (2023)*, § V (“Supervision and Direction”), § VIII (“Communication”), and § XIII (“Public Information and Disclosure”) (*Covers training, complaints, outreach, and data withholding.*)

E. Historical Aggregate Data- Non- Citizen Arrests, Detentions, and Transfers (Pre-MOA Baseline)

21. **Non-Citizen Arrests (Local Jurisdiction)** – Refers to arrests made by the Grafton County Sheriff's Office (GCSO) or other local law-enforcement agencies under local or state criminal authority, in which the arrested individual was later identified as a non-U.S. citizen. These arrests are not immigration enforcement actions and occur independently of ICE direction. Figures represent aggregate, non-identifiable totals per reporting period. Underlying criminal-case records remain withheld under state privacy and law-enforcement-records protections.
22. **Non-Citizen Detention (Local Holding)** – Refers to short-term custody of a non-citizen individual by GCSO for administrative or safety reasons, or pending ICE coordination. Such holdings are brief (typically less than 24 hours) and occur prior to any ICE detainer or transfer request. Figures represent aggregate, non-identifiable totals of short-term local custody events per reporting period. All individual booking and release data remain withheld.
23. **ICE Notifications/ Referrals** – ICE notifications are informational communications from GCSO to the U.S. Immigration and Customs Enforcement (ICE) concerning the custody, booking, or release of an individual who may be a non-U.S. citizen. Notifications provide information only and do not request enforcement or custody action. ICE Referrals are official record communications recommending that ICE evaluate or assume custody of a specific individual following local arrest or case resolution. A referral may: result in an ICE transfer, be declined, or remain pending. Figures represent aggregate, non-identifiable totals per reporting period.
24. **ICE Transfers Accepted** – Refers to instances in which ICE formally assumed custody of an individual from GCSO. A "transfer accepted" is counted when ICE physically takes control of the individual following a detainer, referral, or verified pickup. Figures represent aggregate, non-identifiable totals of completed custody transfers within the reporting period. No case identifiers or locations are disclosed.
25. **ICE Transfer Declined or No Action** – Refers to cases where ICE was notified or referred an individual for potential custody but did not assume control. Includes instances where ICE explicitly declined, where the local hold expired without pickup, or where no enforcement action was taken following review. Figures represent aggregate, non-identifiable totals of uncompleted or declined transfer opportunities per reporting period. All underlying correspondence remains withheld under DHS operational-security policies.
26. **Disclosure Limitations** – All historical data are published as aggregate totals only. No personal identifiers, case details, or ongoing investigations are disclosed. Publication of these figures is voluntary and at the discretion of the Sheriff's Office, in accordance with Section XIII of the 2025 GCSO-ICE 287(g) Memorandum of Agreement.

E21-26 Sources: 287(g) MOA § II & § XIII (Disclosure Limits); N.H. Constitution, Part I, Article 8; RSA 91-A:1 — Declaration of Purpose (Public Records and Meetings)

F. Grafton County Sheriff Office 287(g) Financial Incentives and Reimbursements

27. **Total ICE Reimbursement** – Refers to the aggregate dollar value of all funds, benefits, and in-kind support received from the U.S. Immigration and Customs Enforcement (ICE) under the 287(g)

agreement during the reporting period. Includes salary, overtime, vehicle, equipment, and training reimbursements, as well as any incentive payments. Figures represent total value for the period; underlying invoices and receipts remain withheld under DHS financial-record confidentiality policies.

28. **Training Reimbursement** – Covers reimbursement or direct payment from ICE for deputy or supervisor participation in ICE-sponsored training, travel, lodging, or per-diem. Includes both initial 287(g) certification courses and subsequent refresher or advanced instruction. Reported as the total amount reimbursed or credited for training within the quarter or fiscal year.
29. **Equipment Reimbursement** – Represents the dollar value of equipment or technology supplied or reimbursed by ICE for 287(g) operations. May include computers, radios, protective gear, or software. Reported as total value per period; serial numbers and procurement details remain withheld.
30. **Vehicle Reimbursement** – Refers to ICE-funded or ICE-issued vehicles and related equipment provided to GCSO under the 287(g) Task Force Model. May include one-time vehicle grants (up to \$100,000 per vehicle), fuel support, or maintenance reimbursements. Reported as aggregate total value; individual vehicle identifiers are excluded.
31. **Salary Reimbursement** – Denotes ICE reimbursement for the portion of GCSO personnel salaries attributable to approved 287(g) duties. May include supervisors, field deputies, or administrative support staff. Figures represent total reimbursed salary costs; employee-level data remain confidential.
32. **Overtime Reimbursement** – Covers overtime wages paid to GCSO personnel for work performed in direct support of ICE operations or training. Reported as aggregate totals per reporting period; no individual timesheets or rates are published.
33. **Quarterly Incentive Payments** – Refers to any periodic federal incentive or performance-based payments issued by ICE to participating 287(g) agencies. Such payments are typically tied to program compliance, data submission, or operational participation benchmarks. Reported as the total amount received in each quarter; criteria for issuance are defined by ICE and may vary annually.
34. **Total Number of Officer Eligible** – The number of GCSO deputies certified or authorized under the 287(9) agreement to perform immigration-related functions or to receive program-linked reimbursements. Reported as a headcount per quarter or year; no names or assignments are disclosed.
35. **Reimbursement Source** – Identifies the federal funding channel through which payments are issued, such as the ICE Office of Enforcement and Removal Operations (ERO), the Office of Professional Responsibility (OPR) for training funds, or the DHS Finance Center for vehicle/equipment transfers. Reported in general terms only (e.g., "ICE ERO 287(g) Program Funds"); specific budget codes remain withheld as Sensitive But Unclassified (SBU) information.
36. **Disclosure Limitations** – All financial data are reported in aggregate, non-identifiable form. Itemized invoices, purchase orders, and payroll records are withheld pursuant to DHS Financial Management Directive 0540.3 and Section XIII of the 2025 GCSO-ICE 287(g) MOA. Publication of any dollar value remains voluntary and subject to the Sheriff's discretion.

F27-36 Sources: U.S. Department of Homeland Security (DHS), "DHS Announces New Reimbursement Opportunities for State and Local Law Enforcement Partnering with ICE" — dated September 2, 2025. *(Defines reimbursements and incentive categories.)*

Disclaimer: This packet is submitted for informational and public record purposes only. It is not intended as legal advice, nor does it represent binding policy. All citations, references, and attachments are drawn from publicly available materials as of October 2025.

A1-A3 GCSO Notification Process (GCSO sends Notice):

Stage	System / Agency	Process	Possible Outcome
1. Local Activity	Grafton County Sheriff's Office (GCSO)	• Arrest or booking event • Vehicle tag or license check	Initiates data query through state systems
2. State Access Point	NH Criminal Justice Information System (CJIS) / NH DMV	Pulls driver or registration data; interfaces with state criminal databases	Data returned to GCSO or passed to Nlets if out-of-state
3. National Interface	Nlets (National Law Enforcement Telecom System)	Routes interstate vehicle and driver queries	Links to NCIC for warrants/stolen property
4. Federal Systems	FBI NCIC; DHS ICE Law Enforcement Support Center (LESC)	• NCIC hit: stolen vehicle / wanted person • ICE notification: immigration-related flag	May trigger federal follow-up or detainer verification
5. Post-Arrest Verification	FBI IAFIS / NGI	Fingerprint or biometric identity check after arrest	Confirms identity or prior record
6. Reporting Level	ICE / GCSO Aggregate Reporting	Aggregate data of notifications or detainer outcomes	Reported in non-identifiable quarterly totals

Figure 4: Information flow pathway illustrating how local law-enforcement activity (arrest or tag check) can route through state and federal systems.

A5-A7 ICE Request Process (GCSO Receives Notice):

Stage	Actor / System	Action	Outcome
1. Subject Identification	ICE (Enforcement and Removal Operations)	ICE identifies a person of interest through database review, detainer, or ongoing investigation.	Triggers request initiation.
2. Request Initiation	ICE → GCSO	Contact is made via fax, email, or phone to confirm whether the subject is in GCSO custody or otherwise located within county jurisdiction.	GCSO receives request for verification.
3. Local Verification	GCSO	Reviews custody status, confirms identification, and verifies details.	Confirms if the person is or has been in GCSO custody.
4. Determine Request Type	GCSO + ICE	GCSO determines which action applies: • Notify ICE of release (Form I-247N / verbal) • Hold for pickup (Form I-247A) • Provide field assistance (Task Force / 287(g) model)	Appropriate notification or action pathway selected.
5. Logging and Communication	GCSO	Records date, contact method, and action taken in agency logs or case management system.	Ensures audit trail and compliance with MOA documentation.
6. Federal Record Update	ICE	Updates detainer or case record in the ICE Enforcement Integrated Database (EID).	Finalizes federal case status; may appear in aggregate reporting totals.

Figure 5: Information-flow summary of the ICE Request Process (A5–A7). Illustrates how ICE requests are initiated, verified, and logged through county channels under the 287(g) framework.