

In the United States Court of Federal Claims

BID PROTEST

(Filed: December 30, 2025)

Redacted Version

CSI AVIATION, INC.,

Plaintiff,

v.

THE UNITED STATES,

Defendant,

and

SALUS WORLDWIDE SOLUTIONS
CORPORATION,

Defendant-Intervenor.

Case No. 25-1338C

Judge Solomson



Declaration of Richard D. DeLucia

I, Richard D. DeLucia, hereby declare as follows:

1. I am over eighteen years of age and legally competent to give this Declaration.
2. I am currently the Senior Vice President – Government Services at CSI Aviation, Inc. (“CSI”).
3. My role within CSI is to oversee all Government Services activities for CSI’s Government Services Division. My background in expeditionary airlift operations began in 1993 in the U.S. Air Force in logistical airlift operations worldwide. I bring over 32 years of airlift experience and solving complex air logistics solutions for the U.S. Government. I have served in U.S. Transportation Command supporting joint airlift operations worldwide from Antarctica, South Pole, North Pole, Presidential Airlift, Africa, Middle East and the Pacific. As a contractor, I have established commercial operations in support of the U.S. Government since 2012 in the same challenging locations.
4. Presently, my primary focus is managing CSI’s twenty-three (23) U.S. Government Airlift Support contracts. CSI provides a diverse range of complex airlift solutions to the U.S. Government, with our primary customers being the Department of War (DOW), Department of Homeland Security (DHS), and Department of Energy (DOE).

A. CSI Aviation

5. CSI is the largest and most diverse NAICS 481211 charter passenger services U.S. contractor, airlifting 700k–1.2 million government passengers per year. CSI utilizes our owned-and-operated aircraft under FAA Part 135 and 121 passenger operations, and CSI recently acquired a large Part 121 air carrier, adding over 50 aircraft to support our diverse customer base. Additionally, CSI subcontracts a wide variety of aircraft when our own aircraft are not available, which gives the U.S. Government a single-source solution for chartering 9–400 seat aircraft worldwide. The composite annual flight hours CSI Aviation manages exceed 40,000 per year across commercial and government flight operations.

6. CSI, as a prime contractor, integrates a wide variety of solutions for our clients and has a long history of providing high-level support to the U.S. Government for over four decades. As a private veteran-owned small business established in 1979, our team is expeditionary-minded and answers the call to all our customers when they call.

7. For U.S. Special Operations, we have provided 24/7 rescue operations in [REDACTED] [REDACTED] for over two years. Our commercial Air Medical Division provides 24/7 critical care airlift services throughout the U.S. southern region, operating over 3,000 missions per year.

8. For the Department of War, CSI is trusted with high-level national security information on a regular basis. CSI is a Top Secret Cleared company and [REDACTED]. We have several personnel holding active Top Secret and Secret clearances to support U.S. Government national security needs.

9. CSI has invested millions in developing past performance and building our business around supporting U.S. Government customers. Strong aviation past performance and prior corporate experience are the foundation of any U.S. Government aviation requirement; without it, the Government is at high risk for accidents and liability when mistakes are made.

10. As an example of the expeditionary nature of CSI, on February 8, 2023, USAID and the U.S. Department of State (DOS) had an urgent need to airlift 222 political prisoners from Nicaragua. This mission was highly sensitive and needed to be evacuated under the cover of darkness, in addition to needing critical care nurses onboard to provide immediate medical care upon arrival in the country. CSI worked closely with U.S. Customs and Border Protection (CBP), Airport Authorities on both sides, and U.S. Embassy personnel to accomplish this urgent mission. CSI accomplished this mission while successfully managing complex coordination across multiple agencies and commercial entities. This is the type of work CSI excels at, and our unprecedented, prior corporate experience and exceptional CPARS past performance shows why CSI is the top DHS aviation contractor.

11. Within DHS, CSI is one of the top 10 largest contractors and the top aviation contractor. CSI is actively supporting several DHS agencies, the U.S. Coast Guard, the Federal Emergency Management Administration (FEMA), CBP, and Immigration and Customs Enforcement (ICE).

12. CSI's work with DHS includes serving as the prime contractor for ICE Air operations under ICE Blanket Purchase Agreement No. 70CDCR24A00000001, awarded against CSI's GSA Schedule contract, for Daily Schedule Large Aircraft (DSLAA) and Special High-Risk Charter (SHRC) flight services ("ICE Air Contract"). This contract supports ICE's involuntary removal operations; the parallel operations to the voluntary removal operations under DHS's Comprehensive Support for Removal Operations (CSRO) program. CSI's ICE Air Contract requires the coordination of world-wide flight operations, medical and security support, scheduling support, passenger management, collection and reporting of flight data to Government personnel, and the coordination of travel documents, licenses, and permits required to operate flights both domestically and internationally.

13. Through my 32 years of experience with complex air logistics, I have developed an understanding of the requirements associated with providing commercial aviation services to the U.S. Government, which are highly restrictive due to multiple aviation accidents involving commercial aircraft back into the 1980s.

14. All federal agencies are required to have a Commercial Air Services (CAS) safety and quality management program. For example, the Department of Interior (DOI) has an aviation division that audits and approves every air carrier, aircraft, and each pilot individually annually. Department of War (DOW) uses the Commercial Airlift Review Board (CARB), each carrier is audited every year and onsite every two years. Department of State (DOS) also has similar aviation safety programs. The Department of Homeland Security (DHS) has never had an enterprise-level aviation safety program for contract aviation; only agency-specific aviation safety programs for the U.S. Customs and Border Protection (CBP) Air and Marine Operations (AMO) and the U.S. Coast Guard (USCG) Aviation. These DHS air programs are specific to government-owned and operated specialty aircraft and not a robust Commercial Air Services safety program designed to audit and evaluate commercial air carriers such as DOI, DOS and DOW programs.

15. Agencies that do not have an established and approved CAS program utilize the GSA Multiple Award Schedule (MAS). GSA has an approved aviation program which allows all agencies access to compliant charter aviation services via the GSA eBuy enterprise system.

16. DHS has never established a compliant CAS program and does not have the oversight capability at this time to self-support charter aviation without GSA MAS or an approved audit program such as DOI or DOW.

17. ICE Air does not have an established and approved CAS program. Consequently, CSI's ICE Air contract supporting involuntary removal operations was awarded against CSI's GSA MAS contract because ICE Air needed to rely on the GSA-approved aviation program.

18. For the ICE Air Contract, CSI operates a fleet of over 30 aircraft operating 7-days a week, 365 days per year. We currently airlift [REDACTED] million passengers per year for DHS ICE. We have developed airlift solutions for DHS to support over 5 million passengers per year with efficient airlift operations mirrored only by major US air carriers such as American Airlines. CSI's current ICE Air operations perform at a 99% mission completion rate. To ensure that domestic and international flight operations are conducted safely, we have inflight security, medical,

communications, standard operating procedures, safety/quality oversight, and a robust flight management system to keep operations in order.

B. CSRO Solicitation

19. CSI was not given the opportunity to respond to the DHS CSRO RFP. However, based on what CSI knows about the procurement from the draft Industry Day slides, Draft Statement of Work, and the May 15, 2025 version of the RFP, CSI is fully capable of meeting all DHS’s requirements for this procurement.

20. If given the opportunity to respond to the DHS CSRO RFP, CSI would have highlighted our aviation experience and depth of experience in immigration proceedings, and teamed with partners including the [REDACTED]. Together, CSI’s composite team would have developed a strong offer with competitive pricing.

21. The responsibility of each team member would be as follows:

CSRO Core Requirement	Responsibility
Flight Coordination & Management	CSI Aviation
International Staging Areas	[REDACTED]
Facilities Management	[REDACTED]
Security Management	[REDACTED]
Healthcare Provisions	CSI Aviation Medical [REDACTED]
Logistics and Administrative Support	CSI Aviation

22. CSI has 300+ employees, among these personnel are 19 full-time employees with backgrounds from immigration components. These experienced personnel are mostly recent retirees from ICE and CBP, they manage pre-mission through post mission coordination with ICE, CBP, Detention Centers and Immigration paperwork verification for all migrant domestic transfers and international removal missions. They hold security clearances and are fully authorized to review and process deportation and removal activities. These personnel bring decades of specialized experience in immigration processing and embassy coordination for the reception of inbound migrants returning to their origins. CSI has a strong foundation of former ICE Senior Deportation Detention Officers (SDDO), Deportation Detention Officers (DDO), and ICE liaisons with partner nation experience worldwide. We pride ourselves on hiring the best ICE personnel after they have left active duty to continue to bring a high level of continuity to our deportation system. These personnel are ready to provide support to the DHS Technical and Advisory Teams (DTAT) deployed in designated host countries with administrative and logistics operations.

23. CSI has several options to provide commercial-grade travel logistics for migrant travel domestically and internationally. Flight Crews and support personnel pre-position daily to meet mission requirements. Additionally, CSI has an entire organic medical capability—providing Medical oversight, Nurses, Paramedics, training, equipment, DEA approval for narcotics and medicine, etc.—that currently support ICE with over 3,000 CSI personnel traveling each week in support of ICE Air flight schedules. CSI, together with its partners, have experience providing support for return operations, including initial screening and eligibility for return, medical screening, supporting the receipt of travel documents in coordination with DHS and other stakeholders, translation services, management of resettlement stipends, and data integration.

24. Coordinating travel has been a core competency for CSI Aviation for several decades as a primary travel services company. CSI has been an IATA Accredited Travel Agency for several years, and our IATA number is 32540303. This allows CSI to seamlessly coordinate the purchase of travel and commercial tickets for escorted and unescorted returns. In 2025, CSI utilizes robust enterprise-level travel systems to schedule, pay, and track flights, hotels, and travel logistics in real time. This would translate well into supporting the CSRO program's needs for several thousand commercial air tickets per week. The data integrate components of our system are compatible with secure API data links to DHS immigration systems such as T8 and Unified Immigration Portal (UIP) data systems.

25. Upon arrival at their country of origin, CSI would use a variety of digital financial transfer methods to securely transfer stipend funds to volunteer removal passengers. Depending on DHS requirements, international financial regulations, and applicable compliance parameters, CSI can provide this service with full accountability and redundancies for anti-fraud protections. There are several methods we can utilize such as Western Union, Venmo, Apple Pay, Wire Transfers, and any other US Government approved method to authenticate and transfer funds to migrants after they arrive at the host nation. Pre-departure medical and eligibility screening are daily activities CSI is currently engaged in with our ICE air operations. Our personnel have full access to ICE's data systems to input data and verify manifests on every mission. Engaging with DHS DTAT and host nations is common practice in ICE Air operations in 2025. The current program has evolved to capture more administrative functions for ICE ERO and to unburden ICE Officers so they can continue field operations. As a result, CSI has significant experience capturing and reporting data on return actions and providing that data in a useful format to the Government.

26. CSI excels at program management support and regularly provides briefings, support, reports, and communications on operations in support of its contracts with the Government and consistently provides this same type of program management support under the ICE Air Contract. CSI has been to the DHS HQ office's Elizabeth Campus for coordination with stakeholders on the efficient execution of ICE air operations, and can attend meetings, collaboration sessions, and other in-person events as requested.

27. CSI's partners at [REDACTED] are well-versed in secured ground transportation and detention centers. Working inside immigration detention centers is an area of expertise [REDACTED] [REDACTED] has excelled at for many years, and CSI would work with [REDACTED] to coordinate escorted and unescorted movements for volunteer removals on commercial or chartered aircraft.

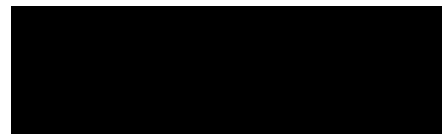
28. Should DHS require additional staging facilities in host nations, CSI would provide these via our partners such as [REDACTED]. If the host nations need a soft-sided or leased space, we can provide temporary shelters on or near airports for receiving passengers on a large scale or tailored to meet the desired throughput at each destination. If it's a non-detention center, then [REDACTED], an expeditionary facilities provider, would establish these arrival centers in existing or temporary structures. This would include full life support, food service, and/or security as needed to provide a high level of support and safety to the migrant population. If these centers are to be developed for detention-style facilities in compliance with US detention standards, CSI's partners at [REDACTED] provides world class detention centers, operating several dozen facilities worldwide. If the host nations need further vehicles or provisions for increasing immigration and border security, CSI can facilitate this with full accountability for how funds are spent and accounted for at each destination.

29. Accordingly, CSI has the breadth and depth of experience to accomplish all of DHS's requirements for the CSRO contract. Had CSI been given the opportunity to respond to the DHS CSRO RFP, or Industry Day, CSI would have bid on the solicitation and amply demonstrated its ability to perform the full scope of work.

30. Had CSI been able to compete for and been selected for the CSRO contract, the procurement would have represented a significant opportunity to leverage CSI's strengths and experience to facilitate material growth in its logistical airlift operations worldwide. CSI, with its well-established team members and expansive network of service providers, would have been able to provide a sustainable and seamlessly coordinated approach to facilitating removal operations against proven CAS safety and quality management standards. Due to the Agency's categorical decision to exclude ICE Air contractors from the procurement, CSI lost the opportunity to fairly compete for the CSRO contract, suffered economic harm, and was denied the chance to meaningfully develop and grow its operations.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 30, 2025



Richard D. DeLucia