May 3, 2021

Alejandro Mayorkas Secretary U.S. Department of Homeland Security 301 7th Street SW Washington, DC 20528

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Re: Request for Withdrawal and Reevaluation of DHS Records Schedules Authorizing Destruction of Records of Abuse, Neglect, and Misconduct

Dear Messrs. Mayorkas, Johnson, Miller, and Ferriero, and Ms. Moran:

Since 2017, the National Archives and Records Administration ("NARA") has approved three records disposition schedules authorizing U.S. Immigration and Customs Enforcement ("ICE") to destroy records documenting abuse, neglect, misconduct, and civil rights violations of people in ICE detention. NARA is also currently considering a proposed records disposition schedule covering similar records of U.S. Customs and Border Protection ("CBP").

The undersigned organizations—a diverse coalition of more than 80 immigrant and civil rights advocates, government watchdogs, historians, media organizations, archivists, and researchers—write to urge the Biden administration and NARA to immediately withdraw and reevaluate each of these records disposition schedules for two reasons. First, a recent ruling by a federal judge calls into question the government's overall approach to appraising the archival value of records reflecting abuse and neglect in the U.S. immigration system. Second, since the records at issue were initially appraised, several alarming reports of ICE and CBP abuse have come to light, particularly following the outbreak of COVID-19. These recent developments provide ample reason for the government to comprehensively reappraise the records at issue to determine whether they "have sufficient administrative, legal, research, or other value to warrant

their continued preservation by the Government."¹ As 27 members of Congress recently wrote in a letter to DHS and NARA, these events have only confirmed that "records documenting serious abuse, neglect, and misconduct in our immigration system should be preserved, not destroyed."²

Secretary Mayorkas has often stressed his commitment to making DHS "open, transparent, and accountable."³ We are calling on the Biden administration to follow through on this commitment by ensuring that critical documentary evidence is not erased from history.

I. Background

A. The ICE and CBP Records Schedules At Issue

DHS and its components ICE and CBP were established in 2003,⁴ and have since obtained NARA's approval of disposition schedules covering a variety of agency records.⁵ Among them are three disposition schedules authorizing ICE to destroy records documenting abuse, neglect, misconduct, and civil rights violations of people in ICE detention:

- Civil Rights Records, DAA-0567-2015-0010 (approved May 31, 2017), https://bit.ly/3x50VUB (providing temporary retention periods for Detainee Medical Complaint Records, Civil Rights and Civil Liberties Complaint Records, and Detention Site Complaint Records, among other records)
- Detainee Records, DAA-567-2015-0013 (approved December 11, 2019), <u>https://bit.ly/3n1HPdt</u> (providing temporary retention periods for Detainee Sexual Abuse and Assault Files, Enforcement and Removal Operations ("ERO") Detainee Death Review Files, Detention Monitoring Reports, Detention Reporting Information Line ("DRIL") Records, and Detainee Segregation Reports, among other records)
- Office of Professional Responsibility, DAA-0567-2015-0012 (approved March 16, 2020), <u>https://bit.ly/2P1SFUh</u> (providing temporary retention periods for Internal Affairs Routine Misconduct Investigative Case Files, Mismanagement Inquiry and Allegation Files, and Office of Detention Oversight Inspection Files, among other records)

¹44 U.S.C. § 3303a(a); *see* Appraisal Policy of the National Archives § 10, Sept. 2007, <u>https://bit.ly/390upse</u> ("NARA will reappraise records when there is compelling evidence that earlier appraisal decisions require review.").

² Letter from 27 Members of Congress to DHS, ICE, CBP, and NARA, Apr. 13, 2021, <u>https://bit.ly/3egK881</u>; Press Release, <u>Reps. Tlaib & Johnson Lead Colleagues in Demanding Critical Immigration Abuse, Misconduct Records be Preserved</u>, Rep. Rashida Tlaib, Apr. 15, 2021, <u>https://bit.ly/3anAvDE</u>.

³ DHS, Message from Secretary Alejandro N. Mayorkas, Feb. 2, 2021, <u>https://bit.ly/3eVDc2t</u>.

⁴ Chad C. Haddal, *Border Security: Key Agencies and Their Missions*, Congressional Research Service, Jan. 26, 2010, <u>https://bit.ly/3bYjb9I</u>.

⁵ See NARA, RG-0563: General Records of the Department of Homeland Security, <u>https://bit.ly/3cMYNaS</u>; NARA, RG-0567: U.S. Immigration and Customs Enforcement, <u>https://bit.ly/3s2EBId</u>; NARA, RG-0568: U.S. Customs and Border Protection, <u>https://bit.ly/390dvdg</u>.

In addition to these approved ICE schedules, NARA is also currently considering the following proposed CBP records schedule:

• Administrative and Management Records: Internal Investigation Records, DAA-568-2018-0001 (submitted May 10, 2018), <u>https://bit.ly/32sbNhg</u> (proposing temporary retention periods for Civil Rights and Civil Liberties Case Files, Misconduct Files, and Prison Rape Elimination Act Allegation Tracking Records)

Numerous organizations, including many of the undersigned, submitted public comments opposing the proposed CBP records schedule.⁶

B. Recent Legal and Factual Developments

1. The CREW v. NARA Decision

On March 12, 2021, the U.S. District Court for the District of Columbia vacated in part NARA's approval of ICE's "Detainee Records" disposition schedule, holding that "as to the Sexual Abuse and Assault Files, ERO Death Review Files, Detainee Segregation Case Files, Detention Monitoring Reports, and DRIL Records, NARA's approval of the Disposition Schedule was arbitrary and capricious because it failed to consider an important factor—the research value of the records—and failed to adequately respond to comments pointing out that it had failed to consider that factor."⁷

The *CREW* decision provides an in-depth analysis of NARA's obligations under the disposal provisions of the Federal Records Act, NARA's Appraisal Policy, and the Administrative Procedure Act. The court explained that "NARA was required by both the governing statutes and the agency's Appraisal Policy to consider the research value of the records in ICE's Disposition Schedule," but "failed to meaningfully do so."⁸ Specifically, the administrative record did "not reveal that NARA considered current research use or made inferences about the anticipated use of the documents in future research," even though these considerations are "at the forefront of the Appraisal Policy."⁹ "Rather than grapple with" commenters' "significant points" regarding the ICE records' research value, "NARA summarily answered that the records' 'anticipated research use will be more contemporary rather than many years into the future," without providing any "insight into *how* the agency determined that the records had contemporary rather than long-term research value."¹⁰

⁶ See Letter from 103 Organizations to NARA re: CBP Document Destruction Proposal, Sept. 30, 2020, <u>https://bit.ly/3x2YHFr</u>; Letter from Eight Organizations to NARA re: DHS Document Destruction Proposal, Sept. 29, 2020, <u>https://bit.ly/3swzwHR</u>; see also Alice Speri, <u>Homeland Security Wants to Erase its History of Misconduct</u>, *The Intercept*, Oct. 6, 2020, <u>https://bit.ly/3anP6PE</u>.

⁷ CREW v. NARA, 2021 WL 950142, at *8 (D.D.C. Mar. 12, 2021).

⁸ Id.

⁹ Id.

¹⁰ Id.

The *CREW* court also noted "two additional considerations that motivate[d] its decision."¹¹ First, NARA itself has recognized that it "previously underestimated the research value of important immigration records" of ICE's predecessor agency, the Immigration and Naturalization Service, archived in NARA's "Record Group 85."¹² In particular, a 2018 NARA report lamented that many of these records were destroyed because they were erroneously "thought by some to have little or no future value fifty years ago," even though they are "now considered priceless by historians, social scientists, and genealogists."¹³ The court explained that the "lessons of Record Group 85 provide all the more reason for NARA to carefully consider the future research value of the records listed in ICE's Disposition Schedule."¹⁴ Second, insofar as NARA justified temporary retention of certain records "on the basis that information contained in those records is '[c]aptured elsewhere' in long-term temporary or permanent records," the court explained that NARA needed to "weigh the research value of any information that is preserved in primary sources but is *not* captured by secondary summaries or other documents that are permanently preserved."¹⁵

2. Recent Reports of ICE and CBP Abuse, Neglect, and Misconduct

Since NARA approved the latest of the records schedules at issue here in March 2020, several disturbing reports of ICE and CBP abuse, neglect, and misconduct have come to light—particularly following the outbreak of COVID-19.

A February 2021 report found that ICE detention centers have had "some of the worst [COVID-19] outbreaks in the country," and that "clear inaction by ICE and its (for-profit) subcontractors has allowed the virus to run rampant."¹⁶ ICE has "withheld protective equipment; transferred detainees needlessly between facilities; ignored detainees' medical needs; and physically and mentally abused detainees with fists, pepper spray, and solitary confinement for seeking medical care."¹⁷ The agency has adopted policies that "significantly differ" from those established by the Centers for Disease Control and Prevention ("CDC"),¹⁸ drawing sharp criticism from public health experts.¹⁹ ICE has also come under scrutiny for failing to notify health officials and nonprofits when individuals have tested positive for COVID-19 and been released from facilities.²⁰ As of March 12, 2021, ICE still had no agencywide plan for providing

¹⁷ Id.

¹⁸ Id.

¹¹ Id. at *9.

¹² Id.

¹³ Id.

¹⁴ Id.

¹⁵ *Id.* (emphasis added).

¹⁶ Eli M. Cahan, <u>America's Immigration System Is a COVID Superspreader</u>, *Scientific American*, Feb. 26, 2021, <u>https://bit.ly/3sbemzD</u>.

¹⁹ John J. Openshaw and Mark A. Travassos, <u>COVID-19 Outbreaks in US Immigrant Detention Centers: The Urgent</u> <u>Need to Adopt CDC Guidelines for Prevention and Evaluation</u>, 72:1 *Clinical Infectious Diseases* 153, January 2021, <u>https://bit.ly/3IGSEkg</u>.

²⁰ Jon Gerberg and Maria Sacchetti, <u>A border community, ICE at odds over release of detainees with covid</u>, *The Washington Post*, Mar. 14, 2021, <u>https://wapo.st/3cFHCJw</u>.

COVID-19 vaccines to detained people, nor could it say how many detained people had been vaccinated.²¹ And on March 30, 2021, the DHS OIG issued a report identifying widespread mistreatment of immigrants detained at La Palma Correctional Center in Arizona, ranging from inadequate medical care to excessive punishment for peacefully protesting lax COVID-19 mitigation efforts.²²

Alarming revelations of abuse at particular ICE detention facilities have also emerged in the past year. A September 2020 whistleblower complaint provided a horrific account of a doctor performing invasive gynecological procedures on detained women without their consent at an ICE detention center in Georgia.²³ The whistleblower further alleged "jarring medical neglect" at the facility, including "refusal to test detained immigrants for COVID-19 who have been exposed to the virus and are symptomatic, shredding of medical requests submitted by detained immigrants, and fabricating medical records."²⁴ 173 members of Congress called for an OIG investigation of the whistleblower's claims, noting that they hearken back to the "shameful history of sterilization in the United States, in particular sterilization of people of color and incarcerated people."²⁵ Separately, an August 2020 complaint claimed that guards at an ICE detention center in Texas "sexually assaulted and harassed inmates in a 'pattern and practice' of abuse."²⁶ And an October 2020 complaint described alarming reports that officials at an ICE detention center in Mississippi violently coerced detained immigrants into signing their own deportation documents, including through the use of "physical abuse and pepper spray."²⁷

CBP's response to the pandemic also has been extremely troubling. In response to a CDC order suspending the introduction of certain people from "Coronavirus Impacted Areas,"²⁸ CBP began "expelling" individuals arriving at the U.S.-Mexico border from the United States on March 20, 2021, without giving them the opportunity to apply for asylum.²⁹ In addition to turning away asylum seekers, CBP used this order to turn away and expel nearly 13,000

²¹ Maria Sacchetti, <u>ICE has no clear plan for vaccinating thousands of detained immigrants fighting deportation</u>, *Washington Post*, Mar. 12, 2021, <u>https://wapo.st/3tLBAwE</u>.

²² DHS OIG Report, *Violations of Detention Standards amid COVID-19 Outbreak at La Palma Correctional Center in Eloy, AZ*, OIG-21-30, Mar. 30, 2021, <u>https://bit.ly/3dvmNkl</u>.

 ²³ Letter from Project South to DHS OIG, Sept. 14, 2020, <u>https://bit.ly/2Ph6LAO</u>.
²⁴ Id.

²⁵ Letter from 173 Members of Congress to DHS OIG, Sept. 15, 2020, <u>https://bit.ly/3960zTo</u>.

²⁶ Lomi Kriel, <u>ICE Guards "Systematically" Sexually Assault Detainees in an El Paso Detention Center, Lawyers</u> <u>Say</u>, *ProPublica*, Aug. 14, 2020, <u>https://bit.ly/32wrdBO</u>.

²⁷ Letter from Southern Poverty Law Center and Freedom For Immigrants to ICE and DHS, Oct. 7, 2020, <u>https://static1.squarespace.com/static/5a33042eb078691c386e7bce/t/5f7f17f39e044f47175204fb/1602164723244/R</u> <u>e+CRCL+Complaint+ICE%27s+Use+of+Torture+to+Coerce+Immigrants+to+Sign+Immigration+Documents+at+A</u> <u>dams+County+Correctional+Facility.pdf</u>.

²⁸ CDC, Notice of Order Under Sections 362 and 365 of the Public Health Service Act Suspending Introduction of Certain Persons From Countries Where a Communicable Disease Exists, 85 Fed. Reg. 17,060 (Mar. 26, 2020), https://bit.ly/3tloeML.

²⁹ Dara Lind, <u>Leaked Border Patrol Memo Tells Agents to Send Migrants Back Immediately — Ignoring Asylum</u> <u>Law</u>, *ProPublica*, Apr. 2, 2020, <u>https://bit.ly/39RV9f6</u>.

unaccompanied children,³⁰ despite provisions of the Trafficking Victims Protection Act that require the government to protect children who arrive at the border without a parent or legal guardian.³¹

CBP has been widely criticized in the past year for its abusive and unlawful conduct at the southern border, including by DHS oversight bodies. In January of this year, the DHS OIG published a scathing review of two programs designed to expeditiously process asylum seekers at the border.³² DHS did not concur with five out of six recommendations from the Inspector General, including one that objected to the programs' prolonged detention of individuals in violation of CBP's own detention standards.³³ In 2020, multiple accounts were submitted to DHS documenting horrific mistreatment of detained pregnant individuals in CBP custody.³⁴ The treatment of pregnant individuals in these cases illustrate violations of CBP's own policies and standards regarding this vulnerable population, including detaining pregnant individuals in "short-term" facilities far longer than the 72-hour limit memorialized in CBP policy. These facilities usually lack beds, showers, or full-time medical care staff, making them woefully inadequate to hold pregnant people and putting them at risk for adverse health outcomes, including miscarriages.³⁵

A Freedom of Information Act request uncovered a DHS Office for Civil Rights and Civil Liberties ("CRCL") spreadsheet documenting 42 cases with allegations that CBP mistreated pregnant individuals.³⁶ The document includes accounts of pregnant persons subjected to CBP harassment such as verbal abuse, denial or significant delay in medical care, family separation, and CBP misconduct during searches.³⁷ The allegations arose in multiple settings, including but not limited to detention.³⁸ The most recent supplement to these complaints is an account of a pregnant woman held in DHS custody for 10 days in September 2020 who suffered inhumane conditions, was denied her prenatal vitamins, and was traumatically separated from her husband.³⁹

³³ Id.

³⁸ Id.

³⁰ Hamed Aleaziz, <u>Border Officials Turned Away Unaccompanied Immigrant Children More Than 13,000 Times</u> <u>Under Trump's Pandemic Policy</u>, *Buzzfeed News*, Oct. 28, 2020, <u>https://bit.ly/3t1KENI</u>.

³¹ See 8 U.S.C. § 1232.

³² DHS OIG, *DHS Has Not Effectively Implemented the Prompt Asylum Pilot Programs*, OIG-21-16, Jan. 25, 2021, <u>https://bit.ly/3uxW0cy</u>.

³⁴ Letter from ACLU Foundation of San Diego & Imperial Counties and ACLU Border Rights Center to DHS OIG, Oct. 30, 2020, at 122-32, <u>https://bit.ly/3uW1VZg</u> (the second addendum to a January 2020 complaint regarding CBP mistreatment of detained pregnant people. The March 2020 and October 2020 addenda respectively detail 42 cases known to DHS Office for Civil Rights and Civil Liberties and the account of Ms. Doe, a pregnant person separated from her husband and subjected to harsh conditions in CBP custody).

³⁵ Letter from ACLU Foundation of San Diego & Imperial Counties and ACLU Border Rights Center to DHS OIG, Jan. 22, 2020, at 76, 79, <u>https://bit.ly/2Qx0xxn</u>.

³⁶ Letter from ACLU Foundation of San Diego & Imperial Counties, ACLU Border Rights Center, and ACLU National Prison Project to DHS OIG, Mar. 4, 2020, at 88-91, <u>https://bit.ly/3xaecuW</u>.

³⁷ *Id*. at 89.

³⁹ ACLU, *supra* note 36, at 123-25.

Within the past year, CBP vehicle pursuits have involved dangerous tactics that have resulted in death and serious injuries. In June 2020, a Border Patrol vehicle pursuit ended in a crash that killed seven people in El Paso, TX.⁴⁰ The crash occurred in the same area as another fatal wreck in January 2020 following a Border Patrol chase.⁴¹ In July 2020, a Border Patrol agent ran over a migrant with a CBP vehicle while pursuing a group who was on foot.⁴² CBP has not made their vehicle pursuit policy publicly available, further hindering efforts to hold the agency and its personnel accountable.⁴³

CBP's recent abuses have not been limited to the southern border. Last summer, CBP was mired in controversy after it deployed personnel to several U.S. cities to respond to racial justice protests. CBP agents from the specialized, militarized Border Patrol Tactical Unit were sent to Portland, Oregon, where they engaged in disturbing tactics such as "sweep[ing] people off the street into unmarked vehicles."⁴⁴ The Oregon Attorney General subsequently sued CBP and other federal agencies, alleging that they "engaged in unlawful law enforcement in violation of the civil rights of Oregonians by seizing and detaining them without probable cause."⁴⁵

CBP also continues to flout internal oversight and reform efforts. The situation has grown so dire that CRCL staff went to the press in August 2020 to reveal that CBP was ignoring CRCL's "concerns about the development of a new use-of-force policy," including plans to use "chemical deterrents against people" at the border.⁴⁶

II. Request for Comprehensive Reappraisal of ICE and CBP Records Reflecting Abuse, Neglect, or Misconduct

Section 10 of NARA's Appraisal Policy provides that "NARA will reappraise records when there is compelling evidence that earlier appraisal decisions require review. In such circumstances, NARA will seek Federal agency and public involvement in the reappraisal process."⁴⁷

Here, the recent developments described above constitute "compelling evidence that earlier appraisal decisions require review." In *CREW v. NARA*, the court identified deficiencies with how the government evaluated the archival value of records reflecting abuse, neglect, and

⁴⁰ René Kladzyk, Witnesses say Border Patrol chased car moments before it crashed, killing 7, *El Paso Matters*, July 1, 2020, <u>https://bit.ly/3x7plN8</u>.

⁴⁶ Julia Ainsley and Laura Strickler, <u>DHS staffers say Trump appointees Wolf, Cuccinelli ignoring input on protests, immigration policy</u>, *NBC News*, Aug. 7, 2020, <u>https://nbcnews.to/3v1ioLR</u>.

⁴¹ Debbie Nathan, <u>Border Patrol Agent Speaks Out About a High-Speed Chase That Ended in an Immigrant's</u> <u>Death</u>, *The Intercept*, Feb. 28, 2020, <u>https://bit.ly/3apNXaf</u>.

⁴² Kladzyk, *supra* note 42.

 ⁴³ Letter from ACLU of Texas Border Rights Center to DHS OIG, July 20, 2020, at 204-07, <u>https://bit.ly/2QdqOko</u>.
⁴⁴ Ben Fox, For racial justice protests, US taps tactical border squads, *Associated Press*, July 25, 2020,

https://bit.ly/32q9iMf.

⁴⁵ Press Release, Attorney General Rosenblum Files Lawsuit Against U. S. Homeland Security; Announces Criminal Investigation, Oregon Dep't of Justice, July 17, 2020, <u>https://bit.ly/3n2eXSn</u>.

⁴⁷ Appraisal Policy of the National Archives § 10, Sept. 2007, <u>https://bit.ly/390upse</u>.

misconduct in our immigration system, and provided specific guidance on how NARA should conduct that analysis going forward. The court's guidance is equally applicable to similar records of DHS components that were not addressed in *CREW*, but that may have comparable long-term value for legal, research, historical, or accountability purposes. The government should thus utilize the reappraisal process to apply *CREW*'s teachings in a comprehensive manner to *all* similar DHS component records, not just the ICE records at issue in that case.

Extensive overlap in the appraisal decisions at issue underscores the need for a comprehensive reappraisal effort. For instance, the NARA appraisal memorandum for the proposed CBP records schedule justified temporary retention based partly on the fact that "[s]imilar records" had previously been approved as temporary, including records covered by the ICE "Detainee Records" schedule invalidated in *CREW*.⁴⁸ Insofar as NARA's analysis of the CBP schedule relied on aspects of the ICE records schedule that were later invalidated, that reasoning must be reexamined. Similarly, the NARA appraiser recommended approving destruction of several categories of CBP records on the grounds that some unspecified information from those records is "[c]aptured elsewhere in permanent records."⁴⁹ As noted above, NARA provided similar reasoning for approving the ICE schedule addressed in *CREW*, and the court responded by instructing NARA on remand to specifically "weigh the research value of any information that is . . . *not* captured" in "other documents that are permanently preserved."⁵⁰ Here again, the court's guidance is relevant not only to the records schedule at issue in *CREW*, but also to other similar records schedules of DHS components.

The recent reports of ICE and CBP abuse discussed above—all of which came to light *after* the government rendered the pertinent appraisal decisions—provide further grounds for reappraisal. To take just one example, the reports of rampant medical abuse and neglect at ICE facilities during the COVID-19 pandemic provide compelling grounds to reevaluate the short three-year retention period that NARA approved for ICE "Detainee Medical Complaint Records" in 2017.⁵¹ Such records are likely to shed light on how ICE responded (or failed to respond) to an unprecedented public health crisis and its impact on immigrants in ICE custody, and may therefore have considerable long-term "legal, research, or other value" that was not apparent when NARA approved temporary retention of the records in 2017.⁵²

III. Conclusion

The Biden administration has repeatedly stressed its commitment to bringing accountability and transparency to DHS. In keeping with these statements, we urge DHS and NARA to immediately withdraw the ICE and CBP records schedules described above and to comprehensively reappraise the records at issue pursuant to Section 10 of NARA's Appraisal Policy. Per that policy, we further implore NARA to "seek . . . public involvement in the

⁴⁸ NARA Appraisal Memorandum, CBP Records Schedule DAA-568-2018-0001, July 9, 2020, <u>https://bit.ly/3c4fejX.</u>

⁴⁹ Id.

⁵⁰ *CREW*, 2021 WL 950142, at *9 (emphasis added).

⁵¹ See Civil Rights Records, DAA-0567-2015-0010 (approved May 31, 2017), <u>https://bit.ly/3x50VUB</u>.

⁵² See 44 U.S.C. § 3303a(a).

reappraisal process." Your prompt action is necessary to ensure that critical evidence of abuse and misconduct in our immigration system is not erased from history.

Thank you for your attention to this matter.

Respectfully submitted,

American Civil Liberties Union American Friends Service Committee American Historical Association American Immigration Council American Oversight American-Arab Anti-Discrimination Committee Archivists Round Table of Metropolitan New York Ascension Lutheran Church Asylum Seeker Advocacy Project BuzzFeed, Inc. Center for Comparative Immigration Studies Center for Constitutional Rights Center for Inter-American and Border Studies, University of Texas at El Paso Center for LGBTO Economic Advancement & Research Church World Service Citizens for Responsibility and Ethics in Washington **Civil Rights Education and Enforcement Center** Concerned Archivists Alliance Defending Rights & Dissent Deportation Research Clinic, Buffett Institute for Global Affairs, Northwestern University Equality California Fight for the Future FORGE, Inc. Free Government Information Government Accountability Project **Government Information Watch** Human Rights Initiative of North Texas Human Rights Watch Immigrant Legal Resource Center Immigration and Ethnic History Society Immigration History Research Center, University of Minnesota Institute for Immigration Research, George Mason University Interfaith Coalition on Immigration MN Interfaith Welcome Coalition Inter-university Consortium for Political and Social Research, University of Michigan

> Just Detention International Just Futures Law Laredo Immigrant Alliance League of Women Voters of the United States Legal Aid Justice Center Lyndale United Church of Christ Migrant Center for Human Rights Minnesota Interfaith Coalition on Immigration MuckRock National Center for Transgender Equality National Coalition Against Censorship National Freedom of Information Coalition National Immigrant Justice Center National Immigration Law Center National Immigration Litigation Alliance National Immigration Project National LGBTQ Task Force National Network for Immigrant and Refugee Rights National Security Archive National Security Counselors Network in Solidarity with the People of Guatemala New Mexico Immigrant Law Center NJ Work Environment Council Open the Government **PFLAG** National Planned Parenthood Federation of America **Project South** Protect Democracy RAICES RCHP-AHC Still Waters Anti-Trafficking Program **Reclaim Democracy! Refugees International Restore The Fourth** Sage Information Services Sanctuary and Resistance to Injustice Sanctuary DMV Silver State Equality-Nevada Society for Historians of American Foreign Relations Society of Professional Journalists Southern Border Communities Coalition Transparency International - U.S. Office UndocuBlack Network UnLocal

> Valley Community Presbyterian Church Valley Community Presbyterian Church Immigration Task Force Valley Community Presbyterian Church Mission Team Valley Screen Printing Whitman-Walker Institute Woodhull Freedom Foundation