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5  
 6 **IN THE UNITED STATES COURT OF APPEALS  
 FOR THE NINTH CIRCUIT**

7 UNITED STATES OF AMERICA, ) Appeal from the United  
 8 ) States District Court for  
 9 *Plaintiffs-Appellee,* ) the District of Arizona  
 ) Arizona  
 )  
 10 vs. )  
 )  
 11 STATE OF ARIZONA; and Janice K. ) No.: **No. 10-16645**  
 BREWER, Governor of the State of ) Date: **09/30/10**  
 12 Arizona, in her official capacity. )  
 ) D.C. No.: **CIV-10-1061-SRB**  
 13 *Defendants-Appellants.* )  
 )  
 14 \_\_\_\_\_ )

15 **NOW COMES**, *Amicus Curiae* named below, by and through undersigned  
 16 counsel, and hereby requests leave of this Court to submit a brief in  
 17 support of the Plaintiff's cause of action in the above-entitled  
 18 matter.

19 **I. STATEMENT OF INTEREST OF AMICUS**

20 The American Immigration Lawyers Association ("AILA") is a  
 21 national association of over 12,000 attorneys and law school  
 22 professors who practice and teach in the field of immigration law.  
 23 AILA's objectives are to advance the administration of law pertaining  
 24 to immigration, nationality, naturalization; to promote reforms in the  
 25 laws; to facilitate the administration of justice; and to elevate the  
 26 standard of integrity, honor, and courtesy of those appearing in a  
 27

1 representative capacity in immigration, nationality and nationality  
2 matters.

3 AILA's members practice regularly before the United States  
4 Citizenship and Immigration Services, the Executive Office for  
5 Immigration Review, as well as, the United States District Courts,  
6 Circuit Courts of Appeals, and the Supreme Court of the United States.  
7 The issue presented herein is one of exceptional importance for the  
8 numerous individuals living in Arizona and the United States. The  
9 Arizona Senate Bill 1070 impacts the implementation of federal  
10 immigration law in Arizona and across the country. Its scope,  
11 application, and interpretation directly implicate the efficient and  
12 orderly administration of the nation's immigration laws. AILA's  
13 special expertise on immigration law may be helpful to the court in  
14 resolving the issues before it.

15 Accordingly, Amicus requests leave to submit a brief in support  
16 of Plaintiffs cause of action.

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18 **II. STATEMENT OF PURPOSE**

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20 As more fully set forth in the accompanying brief, *Amicus Curiae*,  
21 respectfully submits that the Arizona legislation Senate Bill 1070  
22 ("SB 1070") attempt to create Arizona-specific laws and enforcement  
23 mechanisms relating to immigration is an impermissible attempt to  
24 regulate immigration. Moreover, SB 1070's legal immigration regime  
25 also fundamentally conflicts with federal immigration law and  
26 legislates in fields already occupied by such law. The federal  
27 government has exclusive power over immigration matters. The U.S.

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1 Constitution grants the federal government the power to “establish a  
2 uniform Rule of Naturalization,” U.S. Const. art. I, § 8, cl. 4, and  
3 to “regulate Commerce with foreign Nations,” U.S. Const. art. I, § 8,  
4 cl. 3. In addition, the Supreme Court has held that the Federal  
5 government’s power to control immigration is inherent in the nation’s  
6 sovereignty. Moreover, The U.S. Congress has created a comprehensive  
7 system of federal laws regulating and enforcing immigration in the  
8 INA. See 8 U.S.C. § 1101 *et seq.* This extensive statutory scheme  
9 leaves no room for supplemental state laws.

10 SB 1070, as amended, compels police officers to make immigration  
11 status determinations and to detain individuals based on a “reasonable  
12 suspicion” standard that is unworkable and cannot be applied by state  
13 and local officers; that requires impermissible reliance on race,  
14 national origin, appearance, and language; and that impermissibly  
15 burdens and interferes with the rights of lawful permanent resident  
16 immigrants and citizens in the state of Arizona.

17 Section 2 of SB 1070 imposes a standard that is unworkable and  
18 preempted by federal law. The law requires state or local officers to  
19 attempt to determine immigration status, which must be determined  
20 through a federal administrative system applying complex federal  
21 statutes and regulations, and which is based upon historical facts  
22 about an individual that are not observable by an officer in the  
23 field. This is especially problematic insofar as determining whether  
24 or not a person is a citizen of the United States can be a complex and  
25 counterintuitive process. U.S. citizens are not required to carry  
26 documentary proof of their citizenship. There is no national database  
27 that contains information on every U.S. citizen. Some people are

1 actually unaware of their U.S. citizenship because they may have  
2 acquired U.S. citizenship at birth by operation of law due to their  
3 parents' citizenship, despite not being born in the United States.  
4 See, e.g., INA § 322, 8 U.S.C. § 1433. Others automatically obtained  
5 citizenship when their parents became naturalized U.S. citizens. See,  
6 e.g., INA § 320, 8 U.S.C. § 1431.

7       Significantly, SB 1070, section 2 impermissibly vests in police  
8 officers unbridled discretion to base their "reasonable suspicion"  
9 that a "person is an alien and is unlawfully present" on the content  
10 of the person's expressive conduct. Nothing in Section 2 forbids a  
11 police officer from developing a "reasonable suspicion" that a person  
12 "is an alien" and/or "is unlawfully present" based solely on that  
13 person's gestures, language, accent, clothing, English-word  
14 selection, failure to communicate in English, and/or other expressive  
15 conduct—all of which is pure speech protected by the First Amendment.  
16 In this regard, SB 1070, section 2 permits a police officer to decide  
17 a person is "an alien" because the person "acts" foreign or fails to  
18 "act" American—or to decide that a person is "unlawfully present"  
19 because the person "acts" as if from a country the officer believes  
20 to be a source of "unlawfully present" immigrants. Accordingly, SB  
21 1070 permits warrantless seizures of individuals without probable  
22 cause that they have committed crimes.

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### **III. CONCLUSION**

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Because the Arizona Legislature has ignored applicable  
27 precedential decisions of the Supreme Court, the U.S. Court of Appeals

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1 for the Ninth Circuit, its sister circuits, and the protections  
2 guaranteed by the U.S. Constitution, *Amicus Curiae* suggests  
3 respectfully request that the Court grant leave to appear in this  
4 matter. Because the case involves a question of exceptional  
5 importance due to the potential impact on thousands of persons present  
6 in the state of Arizona, including U.S. citizens, lawful residents,  
7 and undocumented individuals, who could be improperly and unlawfully  
8 stopped and seized, because the Arizona law permits impermissible  
9 "racial profiling," and whereas the Arizona law conflicts with  
10 Congress' plenary power over immigration and is pre-empted by the  
11 federal scheme under the Immigration & Nationality Act, *Amicus Curiae*  
12 further requests participation in this action.

13 Finally, *Amicus* expresses no position as to the merits of the  
14 individual claims; *amicus'* interest lies rather with the legal issues  
15 involved.

16 Respectfully submitted,

17 \_\_\_\_\_  
/s/

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