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16 *Application for admission forthcoming

17 **UNITED STATES DISTRICT COURT**
18 **EASTERN DISTRICT OF CALIFORNIA**

19 THE UNITED STATES OF AMERICA,

20 Plaintiff,

21 v.

22 THE STATE OF CALIFORNIA; EDMUND
23 GERALD BROWN JR., Governor of California,
24 in his Official Capacity; and XAVIER
25 BECERRA, Attorney General of California, in
26 his Official Capacity,

27 Defendants.

Case No. 18-cv-00490-JAM-KJN

**UNOPPOSED MOTION OF
NATIONAL IMMIGRATION LAW
CENTER AND 79 OTHER
ORGANIZATIONS FOR LEAVE TO
FILE BRIEF AS *AMICI CURIAE* IN
SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFF'S
MOTION FOR A PRELIMINARY
INJUNCTION**

Date: June 20, 2018

Time: 10:00 a.m.

Judge: Hon. John A. Mendez

1 Pursuant to the Court’s Orders of March 27 and March 29, 2018 (Docket Nos. 37, 41),
2 the National Immigration Law Center and 79 other organizations seek leave to file a brief as
3 *amici curiae*. All parties have consented to the brief being filed.

4 The *amici* organizations advocate for the rights of immigrants and their families and
5 work on related issues. In the attached brief, *amici* go beyond California’s showing of why the
6 Court should deny the federal government’s request for a preliminary injunction against portions
7 of three California laws – SB 54, AB 450, and AB 103. Part I of this brief uses experiences,
8 stories, and reports to demonstrate why the public interest supports the three laws, and in
9 particular how the laws advance public safety, prevent the mistreatment of undocumented
10 individuals, protect workers and workplace standards, and protect the health and safety of
11 immigrant detainees. Part II of the brief addresses legislation in state and local jurisdictions
12 outside of California, and shows that the ramifications of this Court’s decision will extend
13 nationwide.

14 *Amici* bring significant expertise and interest to the case. The following briefly describes
15 each organization:

16 The National Immigration Law Center (“NILC”) is the primary national organization in
17 the United States exclusively dedicated to defending and advancing the rights and opportunities
18 of low-income immigrants and their families. Over the past 35 years, NILC has won landmark
19 legal decisions protecting fundamental rights, and has advanced policies that reinforce the values
20 of equality, opportunity, and justice. A major concern of the organization has been federal
21 preemption and state and local authority to adopt policies that promote the wellbeing and sense
22 of inclusion of all community members.

23 The California Immigrant Policy Center (“Policy Center”) is the premiere immigrant
24 rights institution in the state that promotes and protects safety, health and public benefits and
25 integration programs for immigrants, and one of the few organizations that effectively combines
26 legislative and policy advocacy, strategy communications, organizing and capacity building to
27 pursue its mission. The organization has championed local and statewide efforts to disentangle
28 local police from the deportation system, helping to secure passage of the TRUST, TRUTH, and

1 CA Values Acts, and is committed to building upon and expanding these protections. The Policy
2 Center is a constituent-based statewide immigrant rights organization with member organizations
3 that work with directly impacted communities across the state.

4 The Alabama Coalition for Immigrant Justice is a grassroots, statewide network of
5 individuals and organizations that works to advance and defend the rights of immigrants in
6 Alabama. The coalition consists of six non-profit organizations, 14 grassroots immigrant
7 community organizations, and hundreds of individual members. The coalition is leading
8 Alabama to a more equitable and just multi-ethnic, multi-lingual future – building a better
9 Alabama for everyone, from the ground up.

10 Alliance San Diego works to empower diverse people and organizations to engage more
11 effectively in our communities and civic process to create a San Diego where all people can
12 achieve their full potential in an environment of harmony, safety, equality and justice. Alliance
13 San Diego stands in strong support of the California Values Act.

14 The American-Arab Anti-Discrimination Committee (“ADC”) is a nonprofit, grassroots
15 civil rights organization committed to defending the rights of people of Arab descent and
16 promoting their rich cultural heritage. Founded in 1980 by U.S. Senator James Abourezk, ADC
17 is non-sectarian and non-partisan. With members from all fifty states and chapters nationwide,
18 ADC is the largest Arab-American grassroots civil rights organization in the United States.
19 ADC protects the Arab-American and immigrant community against discrimination, racism, and
20 stereotyping, and it vigorously advocates for immigrant rights and civil rights. ADC’s
21 immigration policy work focuses on counteracting the criminalization of immigrants and law
22 enforcement activities that target immigrant populations.

23 Americans for Immigrant Justice (“AIJ”) is a non-profit law firm dedicated to promoting
24 and protecting the basic rights of immigrants. Since its founding in 1996, AIJ has served over
25 100,000 immigrants from all over the world. Its clients are unaccompanied immigrant children;
26 survivors of domestic violence, sexual assault, and human trafficking and their children;
27 immigrants who are detained and facing removal proceedings; as well as immigrants seeking
28 assistance with work permits, legal permanent residence, asylum, and citizenship. Part of AIJ’s

1 mission is to ensure that immigrants are treated justly, and to help bring about a society in which
2 the contributions of immigrants are valued and encouraged. In Florida and on a national level,
3 AIJ champions the rights of immigrants, serves as a watchdog on immigration detention
4 practices and policies, and speaks for immigrants with compelling claims to justice.

5 The Arizona Dream Act Coalition (“ADAC”) is an immigrant youth led organization in
6 Phoenix. It is the mission of ADAC to advocate for the rights of undocumented immigrant
7 communities by fostering leadership, and promoting civic engagement and access to higher
8 education for immigrant youth. ADAC provides services that advance the integration of
9 immigrant youth and their families through values of equity, opportunity, and justice.

10 Asian Services In Action, Inc. (“ASIA”) was founded in 1995 by four women who
11 sought to improve the quality of life for Asians in Northeast Ohio. ASIA’s mission is to
12 empower and advocate for Asian Americans and Pacific Islanders; and to provide them and other
13 communities access to quality culturally and linguistically appropriate information, health, and
14 social services. Serving as the only Asian American and Pacific Islander focused health and
15 social services 501(c)(3) organization in the State of Ohio, ASIA has taken on the most
16 challenging tasks to help the underserved, low-income and immigrant communities across the
17 state. ASIA is invested in ensuring the safety and well-being of local communities from federal
18 government overreach in breaking up families and targeting immigrants.

19 The Asian American Legal Defense and Education Fund (“AALDEF”), founded in 1974,
20 is a national organization that protects and promotes the civil rights of Asian Americans. By
21 combining litigation, advocacy, education, and organizing, AALDEF works with Asian
22 American communities across the country to secure human rights for all. The rights of
23 immigrants in this country are central to AALDEF’s mission.

24 The Asian Law Alliance (“ALA”) is a non-profit law office founded in 1977 by law
25 students from Santa Clara University School of Law. ALA’s mission is to provide equal access
26 to the justice system to Asian and Pacific Islanders and low-income residents of Santa Clara
27 County. ALA provides legal services in the areas of public benefits, civil rights, domestic
28

1 violence, landlord and tenant law, and immigration law. Asian Law Alliance has advocated for
2 the rights of immigrants for more than 41 years.

3 Bet Tzedek – Hebrew for the “House of Justice” – was established in 1974 and provides
4 free legal services to Los Angeles County residents. Bet Tzedek’s Employment Rights Project
5 assists low wage and immigrant workers through a combination of individual representation
6 before the California Labor Commissioner, litigation, legislative advocacy, and community
7 education. Bet Tzedek has taken a leading role in advocating for the rights of immigrant workers
8 in California, including by submitting *amicus* briefs and letters on such issues of broad
9 importance to California employees as those presented in the instant case.

10 The California Employment Lawyers Association (“CELA”) is an organization of over
11 1,300 California attorneys whose members primarily represent employees in a wide range of
12 employment cases, including individual, class actions, and representative actions to enforce
13 California’s employment laws and ensure the vindication of the public policies embodied in
14 California employment law. CELA members also recommend, draft, edit, and support
15 legislation which benefits working men and women. In the experience of CELA’s membership,
16 a large portion of law-wage workers in California is comprised of immigrants or those perceived
17 to be immigrants. Such workers have little bargaining power in the employment relationship and
18 are thus susceptible to intimidation, threats, and retaliation should they pursue their legal rights
19 in the workplace.

20 Canal Alliance is a Marin County, California, nonprofit champion of immigrants who are
21 challenged by a lack of resources and an unfamiliar environment. Canal Alliance’s goal is to
22 break the cycle of poverty, by offering immigration services, family services, and various
23 education programs. Canal Alliance serves a mainly Latino low-income population. Canal
24 Alliance has been around for over 30 years fighting and advocating for its community.

25 CASA is the foremost Latino and immigrant organization in the mid-Atlantic region and
26 a national leader in supporting immigrant families and ensuring that all individuals have the core
27 supports necessary for full participation in society. CASA was founded in 1985 and its mission
28 is to create a more just society by building power and improving the quality of life in working

1 class and immigrant communities. Over its 32-year history, CASA has won the deep trust of the
2 immigrant community and established itself as a strong national leader in innovations for
3 immigrant-focused services, as well as a backbone organization for collective impact involving
4 community-based, government, and private partners. A core part of CASA’s work is
5 encouraging state and local governments to build trust with their immigrant residents and enact
6 policies that ensure family unity and prosperity for all, free from federal overreach and
7 interference.

8 Catholic Charities of Oregon Immigration Legal Services provides legal services to low-
9 income immigrants throughout the state of Oregon. A major part of its practice includes
10 providing services to immigrants who are victims of crime. Laws such as California’s SB 54 and
11 similar legislation in Oregon encourage immigrant crime victims to get needed help from law
12 enforcement and facilitate the protection of their rights.

13 Causa is Oregon’s Latino immigrant rights organization. Causa was founded in 1995 by
14 farmworkers, Latinos, immigrants, and allies to defeat ballot measures that would have
15 negatively impacted the lives of Latino families in Oregon. Causa works at the state and national
16 levels to advance issues that impact the daily lives of Latino immigrant families. Some of these
17 issues include immigration reform, driver licenses, access to higher education, economic justice,
18 and health equity. A primary concern of Causa is the preservation of common sense protections
19 for immigrant workers and families.

20 Center for Employment Training Immigration and Citizenship Program (“CET-ICP”)
21 provides high quality immigration and citizenship services in Santa Clara County and beyond,
22 and promotes and strengthens civic involvement among the immigrant population. CET-ICP
23 supports local policies that promote the safety, inclusion and empowerment of all community
24 members.

25 The Center for Popular Democracy is a national organization that works to advance
26 progressive policy change on a wide range of issues through grassroots organizing and advocacy.
27 Since its founding, the organization has fought for the equal rights of non-citizens, and has led
28 campaigns in over 20 cities, counties, and states to enact laws and policies that will mitigate the

1 impact of mass deportation on immigrant communities. The legal grounding for many of the
2 victories the organization has won is at issue in this case, and the stakes for its grassroots
3 affiliates in this litigation are extremely high.

4 The Central Coast Alliance United for a Sustainable Economy (“CAUSE”) dedicates
5 itself to building grassroots power to advance social, economic, and environmental justice for
6 people of California’s Central Coast Region. CAUSE has a vision that together we can create a
7 global community where we all contribute to, and benefit from, a sustainable economy that is
8 just, prosperous, and environmentally healthy. For this reason, CAUSE supports states and
9 localities adopting policies that benefit and include all community members.

10 The Central Coast Immigrant Rights Coalition (“CCIRC”) unites organizations to
11 educate and organize immigrants and allies, and to advocate for humane and just policies that
12 advance the rights of all immigrants. CCIRC envisions a central coast region in which
13 immigrants are self-empowered, celebrated, safe from the fear of criminalization, raids, and
14 deportation, and are fully afforded the rights and responsibilities of civic sustainable policies that
15 uphold the human rights of immigrants.

16 The Central Valley Immigrant Integration Collaborative (“CVIIC”) serves as the leading
17 immigrant integration organization in the Central Valley, dedicated to ensuring full participation
18 of immigrants in building strong, vibrant, inclusive communities. CVIIC’s priorities include
19 support for policies that uphold the American tradition of being a nation of immigrants, promote
20 the full (economic, social, civic) integration of immigrant families, and ensure due process.

21 Centro de los Derechos del Migrante, Inc. (“CDM” or the “Center for Migrant Rights”) is
22 a U.S. section 501(c)(3) migrant workers’ rights organization with offices in Baltimore,
23 Maryland; Mexico City; and Oaxaca, Mexico. CDM’s mission is to improve the working
24 conditions of low-wage workers throughout the U.S. and to ensure the U.S.-Mexico border is not
25 a barrier to access to justice. The foreign-born communities CDM serves are frequently
26 subjected to labor, civil rights, and constitutional violations. CDM therefore has a significant
27 interest in preserving the protections provided under the California laws at issue in this case.

28

1 Centro Laboral de Graton organizes with day laborers and domestic workers for their
2 rights and dignity as workers and immigrants. The organization’s mission is to advance and
3 protect the human, labor, and civil rights of day laborers, domestic workers, and their families by
4 promoting participatory democratic leadership and worker solidarity, to develop greater
5 opportunities for employment, health, education, and civic participation.

6 Centro Legal de la Raza (“Centro Legal”), founded in 1969, is a comprehensive legal
7 services agency protecting and advancing the rights of immigrant, low-income, and Latino
8 communities through bilingual legal representation, education, and advocacy. By combining
9 quality legal services with know-your-rights education and youth development, Centro Legal
10 promotes access to justice for thousands of individuals and families each year throughout
11 Northern and Central California. The three California laws at stake in this case are critical to
12 promoting the well-being and security of the communities Centro Legal serves.

13 The Coalition for Humane Immigrant Rights (“CHIRLA”) is a nonprofit organization
14 whose mission is to create a just society fully inclusive of immigrants. CHIRLA organizes
15 thousands of immigrants and their families to engage in programs that include organizing, legal
16 services, civic engagement, and policy advocacy.

17 Communities for a Better Environment (“CBE”) is an environmental justice organization
18 that provides community organizing, and technical and legal support to low-income communities
19 of color in the Los Angeles and Bay areas. Established in 1978 in California, CBE works to
20 empower communities, including immigrant communities, to exercise their rights around social
21 change. CBE’s members rely on California’s protections so they can safely advocate for a
22 healthy environment where they live, work, play, and pray.

23 Community Legal Services in East Palo Alto (“CLSEPA”) provides transformative legal
24 services to low-income immigrants in and around East Palo Alto, California, where two-thirds of
25 the population is Latino or Pacific Islander. CLSEPA’s practice areas include immigration,
26 housing, and economic advancement. It recently established an Immigrants’ Rights Project in
27 part to ensure that the constitutional rights of immigrants are upheld through litigation and policy
28 advocacy, and to secure and protect immigrant friendly policies.

1 The Council on American-Islamic Relations, California (CAIR-CA), is a chapter of the
2 nation’s largest American Muslim civil rights and advocacy organization. CAIR-CA’s mission
3 is to enhance understanding of Islam, protect civil rights, promote justice, and empower
4 American Muslims. As part of its legal services efforts, CAIR-CA provides immigration legal
5 services through each of its four local offices, working to empower and protect non-citizens.
6 CAIR-CA is dedicated to providing services to individuals whose immigration status and daily
7 lives will be impacted by the injunction the federal government seeks.

8 Dolores Street Community Services (“DSCS”) nurtures individual wellness and
9 cultivates collective power among low-income and immigrant communities to create a more just
10 society. DSCS’s Deportation Defense and Legal Advocacy Program provides legal services to
11 immigrants in San Francisco, specializing in complex removal defense cases and particularly
12 vulnerable clients, including those in immigration detention and immigrant survivors of crime.
13 DSCS’s Workers’ Rights programs focus on uniting, empowering, and organizing immigrant
14 workers for dignified work and fair wages. As an organization, DSCS has witnessed the toll
15 taken by local law enforcement’s entanglement with federal immigration enforcement, and has
16 been particularly concerned about the conditions in which its detained clients are held.

17 Esperanza Community Housing Corporation (“Esperanza”) is a social justice non-profit
18 dedicated to the equitable development and the protection of human rights in South Central Los
19 Angeles. Low-income residents of all ages and backgrounds are the foundation of Esperanza’s
20 grassroots work. Esperanza creates opportunities for growth, security, inclusion, and
21 participation. Esperanza develops and preserves affordable housing; promotes health equity and
22 access to care; celebrates involvement in the arts and culture; pursues economic development;
23 ensures inclusion for all residents; and advocates for progressive public policy and human rights.
24 Esperanza believes that all community members have a right to live in an environment that
25 protects their individual and collective safety; prevents mistreatment of individuals based on
26 their perceived ethnicity, and resulting from xenophobia and racial profiling; and protects their
27 health and well-being, regardless of their circumstances.

28

1 GLBTQ Legal Advocates & Defenders (“GLAD”), through strategic litigation, public
2 policy advocacy, and education, works in New England and nationally to create a just society
3 free of discrimination based on gender identity and expression, HIV status, and sexual
4 orientation. GLAD has litigated widely in both state and federal courts in all areas of the law to
5 protect and advance the rights of lesbians, gay men, bisexuals, transgender individuals, and
6 people living with HIV and AIDS. GLAD has an enduring interest in ensuring that our
7 government treats every individual in this country equally and with dignity and respect.

8 The Illinois Coalition for Immigrant and Refugee Rights (“ICIRR”) is dedicated to
9 promoting the rights of immigrants and refugees to full and equal participation in the civic,
10 cultural, social, and political life of our diverse society. In partnership with member
11 organizations, the Coalition educates and organizes immigrant and refugee communities to assert
12 their rights; promotes citizenship and civic participation; monitors, analyzes, and advocates on
13 immigrant-related issues; and, informs the general public about the contributions of immigrants
14 and refugees. ICIRR has successfully advocated for state and local policies that respect
15 immigrants and support their ability to seek police protection, education, health care, and other
16 services, and has opposed policies (including expansion of immigration detention) that seek to
17 separate immigrant families and undermine immigrant communities.

18 Immigrant Defenders Law Center (“ImmDef”) is an independent, non-profit law firm
19 dedicated to advancing social justice for Southern California’s most marginalized immigrant
20 communities through legal services, community empowerment, and advocacy for adults and
21 children in federal immigration custody. ImmDef strives to ensure every noncitizen in removal
22 proceedings is guaranteed due process through access to counsel. Through its representation
23 programs, ImmDef provides pro bono representation to over 700 immigrants in deportation
24 proceedings. To ensure due process, ImmDef’s present and future clients will benefit from the
25 protection of California laws that can protect them and their families from indiscriminate and
26 inhumane immigration enforcement actions.

27 The Immigration Center for Women and Children (“ICWC”) is a state-wide organization
28 in California dedicated to providing affordable immigration services to children who are abused,

1 abandoned, or neglected, and for immigrants who are victims of domestic violence, sexual
2 assault, and other violent crimes. Over the past 14 years, ICWC has provided security and
3 stability to immigrants seeking a safer path forward. ICWC helps an average of 1,000 crime
4 victims annually apply for the U visa, which is immigration relief for victims of crime who have
5 cooperated with law enforcement. Our communities are safer when California laws can protect
6 immigrants' ability to live, work, and report crime to law enforcement.

7 The Innovation Law Lab ("the Law Lab") is a nonprofit organization established to
8 promote, improve, and strengthen due process rights for immigrants and their communities. The
9 Law Lab uses empirical analysis, technology, and litigation to ensure the fair and just
10 administration of our laws. The Law Lab has a direct interest in promoting rule-of-law
11 principles in federal immigration enforcement and in furthering local efforts to promote
12 immigrant-inclusive resolutions and policies.

13 The International Service Center ("ISC") is a community-based nonprofit organization
14 established in 1976 for the purpose of promoting, supporting, and implementing educational,
15 cultural, social, and economic development programs to serve the disadvantaged and
16 underprivileged people, to enable them to become self-supporting and productive members of
17 our society. Over the past 42 years, ISC has been providing a variety of essential services and
18 needed opportunities to newly arrived refugees and immigrants to help them successfully
19 integrate in their new homeland.

20 The Korean Resource Center ("KRC") is a non-profit community organization
21 empowering low-income, immigrants, Asian American and Pacific Islander, and people of color
22 communities in Southern California. Using a holistic approach, KRC integrates services,
23 education, culture, organizing, and coalition building. KRC stands with the immigrant
24 community and support the efforts of state and local authorities to embrace policies that protect
25 and includes all community members.

26 La Raza Centro Legal is a multicultural public interest law and social justice center that
27 was founded in 1973 and is based in the Mission District of San Francisco. Its mission is to
28 create a more just and inclusive society in the interests of the Latino, indigenous, immigrant and

1 low-income people of San Francisco and the greater Bay Area. Through its programs in legal
2 services and community empowerment, the organization seeks to enable people to know and
3 exercise their own legal rights, confront injustice, increase self-sufficiency, and advocate for
4 themselves.

5 LatinoJustice PRLDEF (“LatinoJustice”), founded in 1972 as the Puerto Rican Legal
6 Defense and Education Fund, champions an equitable society. Using the power of the law
7 together with advocacy and education, LatinoJustice seeks to protect opportunities for all Latinos
8 to succeed in school and work, fulfill their dreams, and sustain their families and communities.
9 LatinoJustice has litigated numerous landmark cases addressing issues enabling Latinos to secure
10 equal opportunities in their communities and workplaces.

11 The Legal Aid Justice Center (“LAJC”) is a statewide non-profit legal aid organization in
12 Virginia that provides legal advice, referrals, and direct representation to thousands of low-
13 income immigrant children and adults each year who cannot afford private counsel. Through its
14 legal and community organizing work with immigrant communities around Virginia, LAJC has
15 learned that communities are safer when immigrants and state/local law enforcement work
16 together from a position of trust, keeping federal immigration enforcement concerns out of local
17 policing. This is why LAJC started the “De-ICE Virginia” campaign: to keep local law
18 enforcement out of the business of breaking up immigrant families and dividing immigrant
19 communities.

20 The Legal Aid Society of San Mateo County provides legal services to San Mateo
21 County’s low-income residents. Through the Linking Immigrants to Benefits, Resources &
22 Education (“LIBRE”) program, the Legal Aid Society of San Mateo County collaborates with
23 community partners to educate the immigrant community about safety net services and provide
24 accurate information concerning their immigration opportunities.

25 Legal Services for Children (“LSC”) provides free representation to children and youth
26 who require legal assistance to stabilize their lives and realize their full potential. Through a
27 holistic team approach utilizing legal advocacy and social work services, its goal is to empower
28 clients and actively involve them in the critical decisions that impact their lives. LSC uses this

1 model to achieve safety and stability at home; educational success; and freedom from detention
2 and deportation for its clients. LSC believes that it is critical to the wellness of all California
3 children that every family, regardless of status, feels safe accessing essential services including
4 education services, health services, and law enforcement.

5 The Long Beach Immigrant Rights Coalition is a grassroots network of community
6 organizations and individuals working for just immigration policies and practices that respect
7 human rights and the dignity of immigrants, through education, services, and advocacy. The
8 Coalition envisions a state that serves as a model for a country where all, regardless of
9 immigration status, are guaranteed a fulfilling and prosperous political, economic, and social life.

10 The Los Angeles Center for Law and Justice (“LACLJ”) is a Los Angeles-based non-
11 profit organization that has been providing culturally competent free legal services to low-
12 income residents of Los Angeles and their families for over 40 years. LACLJ’s mission is to
13 fight for the rights of vulnerable families and advocate for a more just legal system. LACLJ has
14 represented hundreds of individuals who have applied for immigration relief based on having
15 survived domestic violence, sexual assault, human trafficking, and/or other violent crimes.
16 LACLJ can thus speak to heightened levels of fear in the immigrant community and how critical
17 it is for immigrant survivors in particular, and the entire immigrant community in general, to
18 continue to have access to protections that ensure their ability to safely report crime and access
19 the courts, along with other vital services.

20 The Lowcountry Immigration Coalition provides a forum for the establishment of a group
21 of individuals, representing the Lowcountry of South Carolina and related communities, in
22 supporting efforts toward comprehensive immigration reform policies in the community,
23 statewide, and nationally. The Coalition seeks to educate, inform, communicate, and advocate in
24 support of immigration policies to advance a human rights agenda, including the protection of
25 civil liberties, prevention of discrimination, and education on cultural awareness. The Coalition
26 supports legal mechanisms locally and nationwide that limit the adverse effect of policies
27 deleterious to the Hispanic and Latino communities wherever they may occur.
28

1 The Maintenance Cooperation Trust Fund (“MCTF”) is a California statewide watchdog
2 organization working to abolish illegal and unfair business practices in the janitorial industry.
3 The MCTF exposes unlawful operations, encourages accountability, promotes responsible
4 business practices, and helps level the playing field in the interest of clients, employers, workers,
5 and the general public. Many of the workers the MCTF has assisted are immigrant workers who
6 are unfamiliar with their rights and protections as workers in the state of California, and who
7 face retaliation from employers for reporting a wage and hour violation, an injury, or a health
8 hazard at work. Many times, the retaliation is in the form of a threat to report them or a family
9 member to Immigration Customs Enforcement or to re-verify their immigration status. The
10 MCTF is interested in supporting policies that promote the enforcement of the rights of
11 immigrant workers, as well as their well-being and sense of inclusion as community members.

12 Michigan Migrant Legal Assistance Project Inc. (“MMLAP”) is a civil legal aid program
13 devoted to protecting indigent migrant and seasonal farmworker rights through litigation and
14 advocacy. During the course of 44 years, MMLAP’s legal victories have established important
15 legal precedents in published cases and advanced the labor and civil rights of migrant workers in
16 Michigan. MMLAP’s work is greatly enhanced by state and local policies that promote equality
17 and inclusion of all community members, regardless of their national origin.

18 The Miguel Contreras Foundation (“MCF”) is the program partner of the Los Angeles
19 County Federation of Labor, AFL-CIO, with a mission to empower working Angelinos –
20 especially immigrants and communities of color – by advancing greater equity through access to
21 good quality jobs and livable communities. MCF’s programs seek to ensure that Los Angeles
22 County supports underserved workers who are the backbone of our thriving economy and an
23 essential part of the rich fabric of our society. All workers, regardless of immigration status, are
24 entitled to the dignity of honest pay for an honest day’s work, safe working conditions, and their
25 basic rights to fair treatment and collective organizing in the workplace and beyond. MCF seeks
26 to uplift the millions of immigrant workers who co-powered California into the world’s fifth
27 largest economy.

28

1 The National Employment Law Project (“NELP”) is a non-profit legal organization with
2 over 45 years of experience advocating for the employment and labor rights of low-wage
3 workers. NELP seeks to ensure that all workers, especially the most vulnerable ones, receive the
4 full protection of labor and employment laws, regardless of immigration status. NELP has
5 litigated and participated as *amicus* in numerous cases addressing the rights of workers.

6 The National Immigrant Justice Center (“NIJC”) is a program of Heartland Alliance,
7 headquartered in Chicago, Illinois. NIJC, through its staff of attorneys, paralegals, and a
8 network of over 1,500 pro bono attorneys, provides free or low-cost legal services to immigrants,
9 including detained non-citizens. NIJC’s direct representation, as well as its immigration advisals
10 to criminal defense attorneys, has informed its strategic policy and litigation work around the
11 myriad legal and policy problems of entangling local law enforcement in civil immigration
12 enforcement.

13 The New York Immigration Coalition (“NYIC”) represents over 200 organizational
14 members and partners working on behalf of immigrants throughout New York State. The NYIC
15 envisions a New York State that is stronger because all people are welcome, treated fairly, and
16 given the chance to pursue their dreams. NYIC achieves this by representing the collective
17 interests of New York’s diverse immigrant communities and organizations and devising
18 solutions to advance them; advocating for laws, policies, and programs that lead to justice and
19 opportunity for all immigrant groups; and building the power of immigrants and the
20 organizations that serve them to ensure their sustainability, to improve people’s lives and to
21 strengthen New York State.

22 The Northwest Health Foundation works to advance the health of the people of Oregon
23 and Southwest Washington. The Foundation recognizes, and the data show, that health and
24 wellbeing is determined by many factors including a sense of inclusion.

25 The Northwest Immigrant Rights Project (“NWIRP”) is a nationally-recognized legal
26 services organization based in Washington State. Each year, NWIRP provides direct legal
27 assistance in immigration matters to over 10,000 low-income people from over 140 countries,
28 speaking over 60 different languages and dialects. NWIRP also strives to achieve systemic

1 change to policies and practices affecting immigrants through impact litigation, public policy
2 work, and community education. Founded in 1984, NWIRP serves the community from four
3 offices in Washington State. NWIRP has a deep interest in the subject of this litigation because
4 it advocates for policies at the state and local level that will promote the well-being of all
5 residents of our communities and is therefore concerned with federal preemption arguments that
6 may limit the ability of state and local jurisdiction to enact such policies.

7 OneAmerica is the largest immigrant and refugee organizing, civic engagement, and
8 advocacy organization in Washington State. OneAmerica was founded as a community response
9 to the backlash against Muslims, Sikhs, undocumented immigrants, and refugees following the
10 9/11 terrorist attacks. OneAmerica's mission is to build the power of immigrant and refugee
11 communities with key allies to advance the fundamental principles of justice and democracy.
12 OneAmerica has successfully advocated for administrative and legislative policy changes at the
13 state and local level to prevent immigrant and refugee families from being separated by
14 immigration enforcement actions. Ensuring that state and local governments have the authority
15 to adopt and implement policies that promote the wellbeing and belonging of all communities is
16 an organizational priority consistent with OneAmerica's mission and purpose.

17 OneJustice is a statewide legal services organization working to bring life-changing legal
18 help to those in need by transforming the civil justice system. Since 1979, OneJustice has
19 worked with civil justice nonprofits, law firms, corporations, and law schools to strengthen and
20 expand California's legal services delivery system serving immigrants, veterans, seniors, and
21 families. OneJustice coordinates the California Immigration Pro Bono Network, engaging the
22 private sector in ensuring pro bono immigration services in partnership with local legal services
23 and social services nonprofits and immigrant communities throughout the state.

24 The Oregon Interfaith Movement for Immigrant Justice, a member of Oregon Ready, is
25 an organization made up of diverse faith communities, faith leaders, and individuals called by
26 conscience to respond actively and publicly to the suffering of our immigrant brothers and sisters
27 in the U.S. Through advocacy, accompaniment, and organizing, the organization exposes the
28 injustices current immigration policies inflict on the entire community and take radical action for

1 the transformation of power, providing real opportunities to take action for change. Just as we
2 open our hearts to provide welcome and accompaniment to people facing persecution and
3 oppression, the Oregon Interfaith Movement for Immigrant Justice opens our doors to offer
4 sanctuary for immigrants faced with family separation, detention, or deportation.

5 The Oregon Justice Resource Center (“OJRC”) is a Portland based, non-profit
6 organization founded in 2011. OJRC works to promote civil rights and improve legal
7 representation to traditionally underserved communities, including non-citizens. OJRC serves
8 this mission by focusing on the principle that our justice system should be founded on fairness,
9 accountability, and evidence-based practices. The OJRC’s Immigrant Rights Project provides
10 personalized advice to public defense providers regarding the immigration consequences of pleas
11 and convictions for non-citizens.

12 Pangea Legal Services (“Pangea”) is a non-profit organization based in San Francisco
13 and Santa Clara County, California, that provides low-cost and free legal services to immigrants
14 in removal proceedings. In addition to direct legal services, Pangea also advocates on behalf of
15 the immigrant community through policy advocacy, education, and legal empowerment efforts.
16 Pangea represents detained and non-detained immigrants who have an interest in exposing illegal
17 conditions in ICE detention facilities and preventing the enmeshment of local police with
18 immigration enforcement.

19 Presente Action is the nation’s largest online Latinx organizing group, with 500,000
20 registered member volunteers nationwide, and advances social justice with technology, media,
21 and culture. Since 2009, Presente Action has worked to protect the fundamental human rights,
22 safety, and livelihoods of millions of immigrants by helping to organize public support for
23 DREAMers (recipients of Deferred Action for Childhood Arrivals (“DACA”)) and Temporary
24 Protected Status (TPS) holders and by strengthening nationwide public responses to attacks on
25 our communities. Presente Action is deeply concerned that federal preemption of California
26 laws, like SB 54, will erode necessary and legal protections for immigrants and instill a culture
27 of fear, which has dramatic effects on health, safety, and well-being.

28

1 Public Advocates Inc. is one of the oldest public interest law firms in the nation.
2 Founded in 1971 to challenge the persistent, underlying causes and effects of poverty and
3 discrimination and to work for the empowerment of the poor and people of color by raising a
4 voice for social justice in government, corporate, and other institutions, Public Advocates has
5 represented immigrants in protecting their rights under California law to public education as well
6 as prenatal care and emergency health care regardless of documentation status. Through
7 litigation and policy advocacy, Public Advocates has worked to expand educational opportunities
8 and achievement for English Learners and children of immigrants generally in California's
9 public schools, and to provide immigrant families and residents with access to affordable
10 housing and public transportation opportunities.

11 Public Counsel, based in Los Angeles, California, represents indigent immigrants from
12 around the world in their claims for immigration relief. Public Counsel has provided legal
13 services to thousands of immigrants detained by the Department of Homeland Security,
14 including through legal orientations, pro se assistance, direct representation, and impact
15 litigation. Public Counsel is committed to advancing transparency, equality, and justice in our
16 nation's immigration system.

17 The Public Justice Center is a civil rights and poverty law legal advocacy organization
18 with a longstanding commitment to immigrants' rights. Through its race equity and immigrants'
19 rights projects, it seeks to achieve economic equity, work with dignity, safety, access to health
20 care, and other elements of the American quality of life for all.

21 The Refugee and Immigrant Center for Education and Legal Services ("RAICES") is a
22 non-profit legal services and refugee resettlement agency with seven offices throughout Texas.
23 RAICES seeks justice for immigrants through a combination of legal and social services,
24 advocacy, policy, and litigation. In 2017, RAICES provided legal services to over 20,000
25 immigrants and refugees. As one of the largest immigration legal services providers in Texas,
26 the population that RAICES serves is directly impacted by federal, state, and local policies,
27 decisions, and activities that affect the safety, security, and sense of community of immigrants
28 and refugees, such as those that are the subject of this suit.

1 The San Diego Chapter of the American Immigration Lawyers Association (“AILA San
2 Diego”) is the regional chapter of the national association of attorneys who practice and teach
3 immigration law in San Diego and Imperial Counties. The immigration lawyers who practice in
4 the border region know first-hand how imperative it is to have systems in place to counteract the
5 far-reaching nature of unjust immigration enforcement. AILA San Diego attorneys are proud to
6 stand with their clients and colleagues in defense of these essential state laws.

7 The San Diego Immigrant Rights Consortium is a coalition of over 50 organizations
8 across San Diego County. Since 2007, the San Diego Immigrant Rights Consortium has brought
9 together faith, labor, legal, and community groups to advance the rights of immigrants. The
10 Consortium stands in strong support of the California Values Act.

11 The San Diego LGBT Community Center is one of the oldest and largest LGBT
12 community centers in the nation. Functioning as the LGBT community’s anchor organization
13 since 1972, The Center is led by a 12-member board of directors, employs over 50 paid staff, and
14 utilizes more than 1,200 community volunteers to achieve its mission to enhance and sustain the
15 health and well-being of the lesbian, gay, bisexual, transgender, and HIV communities by
16 providing activities, programs, and services that create community; empower community
17 members; provide essential resources; advocate for civil and human rights; and embrace,
18 promote, and support our cultural diversity.

19 Services, Immigrant Rights, and Education Network (“SIREN”) is a leading grassroots
20 organization serving the immigrant and refugee communities in Northern and Central California.
21 For over 30 years, SIREN has provided immigration legal services, engaged in community
22 organizing and civic engagement, and conducted policy advocacy on issues affecting these
23 communities. SIREN works directly with community members who have benefited from state
24 and local policies that limit entanglement between federal immigration agencies and local
25 governments and those who have been affected by immigration enforcement at worksites and
26 being held in detention.

27 The Sierra Club is a national nonprofit organization of approximately 825,000 members,
28 roughly 180,000 of whom live in California, dedicated to exploring, enjoying, and protecting the

1 wild places of the earth; to practicing and promoting the responsible use of the earth's
2 ecosystems and resources; to educating and encouraging humanity to protect and restore the
3 quality of the natural and human environment; and to using all lawful means to carry out these
4 objectives. To protect clean air and water and prevent the disruption of our climate, the Sierra
5 Club recognizes that we must ensure that those who are most disenfranchised and most
6 threatened by pollution within our borders have the voice to fight polluters and advocate for
7 climate solutions without fear. The Sierra Club has taken various actions to support and stand in
8 solidarity with immigrants – the struggles to protect our communities and our environment
9 cannot be separated. The Sierra Club has supported and participated in passage of SB 54, one of
10 the bills under attack, out of the strongly-held belief that the federal government's growing focus
11 on identifying and deporting long-time residents from other countries undercuts our
12 environmental work.

13 Sin Barreras-Without Borders, Inc. is a volunteer non-governmental organization in
14 Charlottesville, Virginia, dedicated to defending and advancing the rights and opportunities of
15 low-income immigrants and their families. Over the past six years, the organization has worked
16 to address Hispanic rights through workshops, one-on-one legal and immigration services, and
17 advocacy with like-minded organizations in Central Virginia. The organization supports state
18 and local policies that promote the wellbeing and sense of inclusion of all community members.

19 South Bay People Power is a grassroots organization that promotes social justice by
20 nonpartisan civic engagement. Over the past year and a half, the organization has successfully
21 advocated for enactment of a series of local policies to ensure the rights of immigrants. The
22 organization is concerned about the ability of the state and localities to take action to protect
23 community members living in the border region of San Diego County.

24 The Southern CA Coalition for Occupational Safety & Health (“SoCalCOSH”) is a
25 grassroots membership organization of workers, unions, community-based groups, workers’
26 rights activists, and health and safety professionals. Based in Los Angeles, it is part of a national
27 network of workers, worker centers, labor unions, university centers, legal aid groups, and allies
28 who discuss, apply analysis, and mobilize toward achieving a fair and just relationship between

1 workers' safety and health and their employers. As an advocate for workers, SoCalCOSH is
2 concerned that the atmosphere of fear around immigration enforcement, stoked by the federal
3 government's attack on California's immigration laws and immigrant communities, dissuades
4 workers from exercising their rights and reporting dangerous health and safety conditions,
5 workplace injuries, or wage theft.

6 St. John's Well Child and Family Center is a network of nonprofit federally qualified
7 health centers providing medical, dental, and mental health services to more than 350,000 patient
8 visits each year in Los Angeles County. As the largest provider of healthcare services to
9 undocumented immigrants in the country, St. John's believes that everyone has a fundamental
10 right to health.

11 Student Action with Farmworkers ("SAF") is an organization whose mission is to bring
12 students and farmworkers together to learn about each other's lives, share resources and skills,
13 improve conditions for farmworkers, and build diverse coalitions for social change. As an
14 organization that has been around for twenty-five years, SAF has witnessed and heard
15 farmworkers and their families testify about the experiences they have had in the fields and in
16 their communities. SAF wishes to support legislation that promotes a feeling of safety within
17 farmworker and immigrant communities as found in SB 54, AB 450, and AB 103.

18 T.R.U.S.T. South LA (Tenemos que Rescatar y Unidos Salvar la Tierra) is a non-profit
19 organization that works with low-income and immigrant community residents to transform the
20 built environment and social conditions in South Los Angeles by serving as a steward for
21 community-controlled land; being a catalyst for values-driven, community-serving development;
22 building awareness and community leadership in issues of housing, transportation, and
23 recreation; and creating programs and initiatives that encourage community building and
24 economic opportunity.

25 UnidosUS (formerly the National Council of La Raza) is the nation's largest Latino civil
26 rights and advocacy organization. Through its unique combination of research, advocacy,
27 programs, and a national network of nearly 300 community-based Affiliate organizations across
28 the country (56 of them in California), UnidosUS simultaneously challenges the social,

1 economic, and political barriers that affect Latinos in the United States. UnidosUS supports
2 policies that advance the public safety of all residents, protect all workers, and create
3 opportunities to integrate newcomers. UnidosUS has learned from experience that without
4 measures like the ones passed in California, trust between residents and law enforcement breaks
5 down, communities report fewer crimes, and law enforcement’s job to keep everyone safe is a lot
6 more difficult.

7 The United Farm Workers Foundation is the fastest-growing, non-profit immigration
8 legal services provider with the largest number of Office of Legal Access Programs Accredited
9 Representatives (“OLAP”) in California. The Foundation has been able to assist with more than
10 13,000 legal immigration direct services and educate more than 160,000 community members on
11 Naturalization, DACA, Know Your Rights, Heat Illness Prevention, and Public Benefit
12 eligibility throughout Coastal and Central California. The Foundation’s mission is to empower
13 communities to ensure human dignity, and it envisions a clear path to social integration and civic
14 participation for immigrants and their children.

15 The Washington Defender Association’s Immigration Project is part of the Washington
16 Defender Association (“WDA”). WDA is a statewide non-profit organization whose members
17 are public defender agencies, indigent defenders, and those working to improve the quality of
18 indigent defense in Washington State. WDA provides support for high quality legal
19 representation by advocating for change, educating defenders, and collaborating with the
20 community and justice system stakeholders to bring about just solutions. In 1999, WDA created
21 the Immigration Project to defend and advance the rights of noncitizens within the Washington
22 State criminal justice system and noncitizens facing the immigration consequences of crimes.

23 White People 4 Black Lives (“WP4BL”) is a white anti-racist collective and activist
24 project of the Alliance of White Anti-Racists Everywhere (“AWARE”). The organization also
25 operates within a national network of white anti-racists called Showing Up for Racial Justice
26 (“SURJ”). WP4BL is concerned with the impact of national and local policies and practices that
27 predominantly target low-income communities of color. These primarily involve harmful
28

1 policing and detention practices that separate families and undermine community safety,
2 security, and wellbeing.

3 The Worker Justice Center of New York (“WJCNY”) has, since 1981, pursued justice for
4 those denied human rights with a focus on agricultural and other low-wage workers, through
5 legal representation, community empowerment, and advocacy for institutional change. WJCNY
6 strongly believes that the positions of the attached brief advance public safety, prevent the
7 mistreatment of undocumented individuals (and others who are believed to be undocumented),
8 protect workers and workplace standards, and protect the health and safety of immigrant
9 detainees.

10 Worksafe, Inc., is a California-based non-profit organization dedicated to promoting
11 occupational safety and health through education, training, and advocacy. Worksafe advocates
12 for protective worker health and safety laws and effective remedies for injured workers through
13 the legislature and courts. Worksafe is also a Legal Support Center funded by the State Bar
14 Legal Services Trust Fund Program to provide advocacy, technical and legal assistance, and
15 training to the legal services projects throughout California that directly serve California’s most
16 vulnerable low-wage workers. Worksafe has an interest in the outcome of this case as it
17 determines the validity of important legislation to workers.

18 *Amici* have a significant stake in this case, and their brief brings to bear their collective
19 wisdom on the issues before the Court.

20 For the reasons stated above, *amici* respectfully request that the Court grant their motion
21 to file a brief as *amici curiae*.

22 Dated: May 18, 2018

Respectfully submitted,

23 /s/ Jonathan Weissglass

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