

# Exhibit 34

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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

Case No. 2:18-cv-00939

STATE OF WASHINGTON, et al.,

*Plaintiffs,*

v.

THE UNITED STATES OF AMERICA, et al.,

*Defendants.*

**DECLARATION OF JENNIFER  
PODKUL IN SUPPORT OF  
COMPLAINT FOR  
DECLARATORY AND  
INJUNCTIVE RELIEF**

I, Jennifer Podkul, Esq., make the following declaration based on my personal knowledge, and declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am the director of policy at Kids in Need of Defense (KIND). KIND is a national non-profit organization with ten field offices providing free legal services to unaccompanied immigrant children who face removal proceedings in Immigration Court. Since 2009, KIND has received referrals for over 15,800 children from 70 countries, and has partnered with pro bono counsel at over 500 law firms, corporations, law schools, and bar associations. KIND also advocates for changes in law, policy,

and practice to enhance protections for unaccompanied children. Since 2010, KIND has also run a return and reintegration program for children who return to their country of origin.

2. KIND has served children who arrived in the United States with parents from whom they were separated by federal officials.

1 3. During interviews with children, KIND staff seek to determine whether children entered  
2 the country with parents from whom they were separated, and will inquire into the  
3 circumstances.

4 4. Several children have reported experiencing distress and confusion at being separated  
5 from parents. For example, a seven-year-old girl reported crying throughout two days  
6 spent in a Border Patrol holding facility, and asking to be reunited with her mother. Other  
7 children have reported worrying about their parents, because they did not know what  
8 happened to them after the separation.  
9

10 5. Through our work representing the children in legal proceedings, as well as supporting  
11 those who return to the country of origin, it is evident to KIND that there is no consistent  
12 policy for ensuring communication among separated children and parents. Some  
13 children served by KIND were allowed to communicate with parents by telephone after  
14 separation. In other cases, children reported that the government did not allow any  
15 communication with a parent while the child was in detention, or that children did not  
16 know the whereabouts of their parents.  
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19 6. In order to provide adequate legal representation to children in removal proceedings, it is  
20 important for the attorney to have a thorough understanding of the child's situation in the

country of origin. Attorneys must ask difficult questions about abuse, abandonment, neglect, violence, persecution, or other harms suffered by children and their families in the country of origin. Children may qualify for humanitarian protection on several grounds, and past harm to the child or to family members may support eligibility for legal relief. A child may have limited memory and understanding of complex or violent situations, making it important for the attorney to speak with members of a child's family who may corroborate information, fill in gaps, and provide additional facts the child might not know or comprehend.

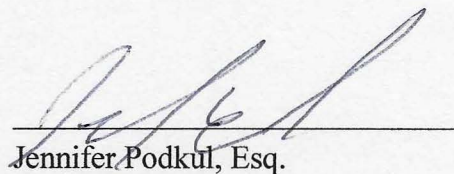
7. Children who were separated from their parents following DHS apprehension may not know where the parent is or how to contact them. Parents of KIND clients may be held in the custody of Immigration and Customs Enforcement or the U.S. Marshall, or may even be back in the country of origin before the child begins working with an attorney.
8. Separation from parents makes it harder for the child to provide the evidence necessary to prove their defense from removal. Many times, the parent has important paperwork, such as notarized affidavits, birth certificates, or police records. Obtaining these documents from a parent who is detained or deported is difficult and resource-intensive.
9. KIND's Return and Reintegration Project has worked with several children who were separated from their parents following apprehension, and sought voluntary departure from the Immigration Judge in order to reunite with a parent and return together to their country of origin. In several such cases, the government was unable to coordinate the return of the parent and child, and the children had to face the return journey alone.

Several of these cases involved very young children.

10. When a child is separated from a parent and rendered unaccompanied, the child's legal case is generally severed from the parent's. Under the Trafficking Victims Protection Reauthorization Act of 2008, unaccompanied alien children are entitled to be heard in removal proceedings before an Immigration Judge. A separated child has his or her own removal case, separate from the parent's matter, which may be expedited and may not be referred to the Immigration Court. Thus, the child's and parent's cases may proceed as two separate matters, often in different tribunals and on very different schedules, although the family members may share in common underlying facts, claims for relief, and evidence.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed in Washington, D.C., on June 30, 2018.



Jennifer Podkul, Esq.  
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jpodkul@supportkind.org

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PODKUL DECLARATION  
2:18-CV-00939

# Exhibit 35

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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

THE UNITED STATES OF  
AMERICA, et al.,

Defendants.

NO. 2:18-cv-00939

DECLARATION OF CHARLES  
ALBERT DUTCH  
RUPPERSBERGER III IN SUPPORT  
OF PLAINTIFF STATES

I, Charles Albert Dutch Ruppensberger III, declare as follows:

1. I am over the age of 18 and have personal knowledge of all the facts stated herein.
2. On June 19, 2018, I visited the Ordinance Road Detention Center in Glen Burnie, Maryland, which contracts with U.S. Immigration and Customs Enforcement to hold detained immigrants, most of whom are awaiting court proceedings or deportation. I made the visit with Rep. Donald Beyer, a colleague of mine in the House of Representatives. Our visit was reported by the Washington Post and other news outlets. *See, e.g.*, Patricia Sullivan, Md., Va. congressmen hear stories of family separation, Wash. Post, June 21, 2018, at B4, available at [https://www.washingtonpost.com/local/immigration/md-va-congressmen-hear-stories-of-family-separation/2018/06/20/af3fe0ae-74aa-11e8-b4b7-308400242c2e\\_story.html?noredirect=on&utm\\_term=.fa6d5bb19919](https://www.washingtonpost.com/local/immigration/md-va-congressmen-hear-stories-of-family-separation/2018/06/20/af3fe0ae-74aa-11e8-b4b7-308400242c2e_story.html?noredirect=on&utm_term=.fa6d5bb19919).



1           3. During our visit, I met two men who had had their children taken from them by federal  
2 immigration officials under the Trump Administration’s family separation policy. Both had to  
3 wait for weeks to hear from their children again.

4           4. One man—whom the Washington Post referred to as Carlos—fled Honduras after gang  
5 violence in that country threatened his life and that of his 7-year-old son. Carlos fled with his  
6 son by train and was arrested by federal officers on March 10, 2018, when they crossed the U.S.  
7 border into El Paso, Texas. Carlos told me that he sought asylum and yet was held in leg irons  
8 for several days, with his son by his side. Then his son was removed. Three months passed  
9 before Carlos was able to speak to his son again. At that time, his son was being housed in a  
10 care facility located in Michigan.

11           5. Carlos had the foresight to make his son memorize a relative’s phone number before they  
12 left Honduras. As a result, his son was able to contact the relative, who connected him to another  
13 family member in the United States. Carlos still did not know when he would be able to see his  
14 son again.

15           6. The second man—whom the Washington Post referred to as Mario—also fled Honduras,  
16 by bus, accompanied by his sister and his 5-year-old daughter. Mario told me that his sister was  
17 a victim of domestic violence committed by a police officer in Honduras. When the family  
18 attempted to press charges, a gang beat Mario up.

19           7. Mario, his daughter, and his sister surrendered to U.S. Customs and Border Patrol on  
20 April 20. Mario told me that he and his sister had both sought asylum. According to Mario, his  
21 sister was ultimately granted asylum, but he and his daughter were placed in an ICE holding  
22 facility. Conditions in the facility were difficult; the room in which they were kept was frigid  
23 and little more than a prison cell. After three days, Mario told us, an officer approached him and  
24 told him to give up his daughter or she would be taken away. Mario told us that his 5-year-old  
25 girl was dragged away from him crying and screaming, which was the last he saw her. Mario  
26

1 told us that he finally heard from his daughter in mid-June but he still did not know where she  
2 was being held.

3 8. Mario and Carlos both told us that they were seeking asylum in the United States and  
4 that they had entered the country through legitimate points of entry. Neither knew where in the  
5 asylum process their cases stood.

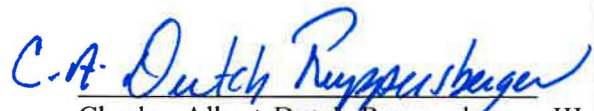
6 9. Both men visibly struggled to maintain their composure while recounting the trauma that  
7 they experienced since coming to the United States and ultimately broke down into tears. Our  
8 interpreter too broke down into tears, finding their stories too painful to bear.

9 10. Carlos and Mario told us that a third man who had been separated from his children under  
10 the Trump Administration's policy was also being held in the facility but we were not able to  
11 speak with him during my visit. In response to our questions, ICE officials indicated that they  
12 did not know how many parents they were holding who had been separated from their children  
13 under the Administration's policy.

14 11. I have asked ICE officials whether detainees or children were being held in Maryland.  
15 ICE officials have confirmed that parents and children separated from one another pursuant to  
16 the Trump Administration's family separation policy are being kept in child care and detention  
17 centers in Maryland.

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

19 Executed on this 29 day of June, 2018 at Washington, D.C.

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21   
22 Charles Albert Dutch Ruppertsberger III  
23 U.S. Representative for Maryland's 2nd  
24 Congressional District  
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# Exhibit 36

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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON, et al.

Plaintiff,

v.

THE UNITED STATES OF AMERICA,  
et al.,

Defendants.

NO. 2:18-CV-00939

DECLARATION OF FRANCISCO  
SERRANO IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
EXPEDITED DISCOVERY

I, Francisco Serrano, declare as follows:

1. I am over the age of 18 and have personal knowledge of the facts herein. If called as a witness, I could and would testify competently to the matters set forth below.
2. I reside in the District of Columbia. I live with my wife, my mother, and my two children who are fifteen- and seventeen-years-old.
3. In May 2018, my niece Maria called me to tell me that she had traveled from El Salvador with a caravan, that she was at the Mexico-United States border and that she was going to cross the border by San Ysidro. She also told me that she was traveling with her two children, M. who is 7 years old and N. who is 2 years old.
4. Approximately a week later I received a call from a shelter indicating that the children were going to be separated from Maria, that they were on their way to New York, that Maria had designated me as a sponsor and asking me whether I was willing to be the sponsor. I

1 told the person that I would be the sponsor and then the person told me that I would be able to  
2 talk to the children twice a week. Attached hereto as Exhibits 1 and 2 are the forms I was told  
3 to complete in early May 2018 so that I could receive Maria's two sons.

4 5. I have spoken with the seven-year-old on several occasions since the family  
5 arrived. He told me that officials told him that he and his baby brother were being taken to a  
6 detention center in Washington, D.C. to be closer to me, their uncle. I received a phone call from  
7 the seven-year-old who thought he was in Washington, D.C., but he was not. He was in New  
8 York. I was told by a social worker that the two young boys are in Lutheran Youth Hostel of  
9 New York.

10 6. To become the sponsor the social worker told me that I had to provide: 1) Maria's  
11 mother's birth certificate, 2) Maria's birth certificate, 3) the kids' birth certificates, and 4) my  
12 birth certificate, driver's license, passport and proof of citizenship. In addition to completing the  
13 paperwork, I had to provide copies of my identification and police record. I did not have copies  
14 of Maria's mother's, Maria's or the kids' birth certificates so I had to ask persons in El Salvador  
15 to send them to me. This process took 5 days because a friend was in El Salvador and was able  
16 to help me, otherwise the process would have taken 15 to 20 days.

17 7. The social worker who was working with the kids told me that once I submitted  
18 the documents she would get approval within 36 hours and the children would be released within  
19 24 hours after that. I did not hear from them within 36 hours, but I assumed that everything was  
20 valid because I had completed all of the forms and followed all of the instructions.

21 8. Approximately one week after I provided the paperwork I was told that I had to  
22 be fingerprinted. The next day I took time off work and got fingerprinted.

23 9. After I submitted all the requested documents the social worker told me that she  
24 was very sorry but that she had only been able to get one of the approvals she needed to approve  
25 the paperwork. She said that she did everything she could but it was out of her hands.  
26

1           10.     In late May 2018, I received a power of attorney from my niece Maria giving me  
2 the authorization to care for her two minor sons. A copy of the notarized power of attorney is  
3 attached hereto as Exhibit 3. I provided a copy of this power of attorney to the social worker in  
4 early June 2018.

5           11.     About a week later I was asked to complete a certified form for a further  
6 background check. On June 1, 2018, I completed the additional form that Lutheran Social  
7 Services had provided to me to get authorization to receive Maria's two sons. I had to have the  
8 form notarized. A copy of that form is attached hereto as Exhibit 4.

9           12.     Then I was informed that I passed the background check but they needed one  
10 more week to release the kids to me. The seven-year-old boy called me and told me that  
11 officials had told him that he and his brother would be released to me in a week.

12           13.     But then, I was told that they needed to perform a DNA test to confirm that  
13 Maria is the children's mom. Recently, the social worker told me that a few days ago a  
14 government employee went to Otay Mesa where Maria was detained to conduct the DNA test  
15 but that Maria was not there. Later, when I spoke to Maria she said that she had been at Otay  
16 Mesa the entire time.

17           14.     Several weeks after I submitted all of the paperwork, on June 22, 2018, I was  
18 told that the paperwork I submitted was wrong, the power of attorney was not valid, and the  
19 boys would not be released to me. The social worker said that we will have to start the  
20 sponsorship process again because the rules changed. She said that there were new forms we  
21 had to complete, but she did not send me the forms until Friday, June 29, 2018. Those forms  
22 are attached hereto as Exhibits 5 and 6.

23           15.     On June 27 after borrowing money from family members, I was able to gather  
24 \$10,000 to post Maria's bond. An immigration agent told me that Maria would come out on  
25 June 28, 2018 and that she would be taken to the bus station so she could take the bus to  
26 Washington, D.C. So Maria's bus ticket was for June 28. But immigration released her on

1 June 27 and Maria called me because the agents left her in a McDonald's and she did not have  
2 any place to go or to sleep. She had to look for someone to take her in for one night and now  
3 she in on the way to Washington, D.C.

4 16. On June 28, 2018, I talked to the social worker who told me that we will have to  
5 start the sponsorship process again and that Maria will have to fill the application and request  
6 the children because she already was released from immigration detention.

7 17. I am concerned that now the process for Maria's children to be reunited with my  
8 family will have to start all over again. Everyone in my home, including my 78-year-old  
9 mother, will have to submit fingerprints, police records, and identification, and we will have to  
10 complete a new application form. Because of my mother's age, it is difficult to get her  
11 fingerprints, and immigration officials previously told her that she would not have to submit  
12 fingerprints again. I was told that my niece Maria will also have to be fingerprinted and will  
13 have to submit all the documentation, as well. I am concerned that Maria will not be able to  
14 produce the right paperwork to be reunited with her sons. Maria does not have a passport, and  
15 all she has is an ID card from El Salvador.

16 18. All this process has been very difficult for my family:

17 a. At first when I would talk to M., the 7-year-old, he was very talkative and  
18 excited because the social worker told him he would be out within a week. When the time came  
19 that M. expected to be released and nothing happened he sounded depressed, he would not say  
20 much and wanted to cry. M. asked me why I had not picked him up yet. The social worker told  
21 me that M. is depressed and asked me for words of encouragement to cheer him up. Yesterday,  
22 June 28, I spoke with him and he is glad because he thinks that soon he is going to be reunited  
23 with his mother. I am worried about M.'s mental health when he learns that we have to start the  
24 process again and that he is not going to be released soon.

25 b. Because I am only able to speak on the phone and N. is too young, I have  
26 not been able to speak with him at all. M. told me that N. cries all the time, and that the only

1 time that the kids see each other is at night. M. told me that they let N. stay with him at night  
2 because he is the only one with whom N. won't cry.

3 c. When I speak with Maria she asks for an update about the children and is  
4 speechless when I tell her that I am still waiting for approval. She cries. She has only been able  
5 to speak with the kids a few times.

6 d. The most affected person by all this is my mother. She raised Maria after  
7 her mother died when Maria was 8 months old. At first, I did not want to tell my mom what was  
8 happening because she is 78 years old and I was concerned that the news would adversely impact  
9 her health. I only told her that Maria and the kids had crossed the border but were detained.  
10 After watching news, my mom demanded I tell her what was happening. My mom became ill  
11 when I told her that the kids had been separated from Maria. Ever since my mom found out  
12 about the family separation, she has had an intense headache and I had to take her to see a doctor.  
13 I am really concerned about my mom's health. For Maria, the separation from her kids repeats  
14 the story as when she lost her mother.

15 e. On my part, this process has been very depressive and frustrating. When  
16 I finally thought that they were going to give me the children they tell me no. I have also had to  
17 take time off work to do all that has been asked of me.

18 19. I am hopeful that Maria, M. and N. will be reunited soon.

19  
20 I declare under penalty of perjury under the laws of the State of California and the laws  
21 of the United States that the foregoing is true and correct.

22 Dated this 30th day of June 2018 in Washington D.C.

23  
24 [Signature]  
FRANCISCO SERRANO



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DECLARATION OF FRANCISCO  
SERRANO IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
EXPEDITED DISCOVERY

OFFICE OF THE ATTORNEY GENERAL  
STATE OF CALIFORNIA  
1300 I Street  
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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON, et al.,

Plaintiff,

v.

THE UNITED STATES OF AMERICA, et  
al.,

Defendants.

NO. 2:18-CV-00939

DECLARACIÓN DE FRANCISCO  
SERRANO EN APOYO A PETICIÓN  
DE LOS DEMANDANTES PARA  
EXHIBICIÓN DE PRUEBAS  
ACELERADA

Yo, Francisco Serrano, declaro lo siguiente:

1. Tengo más de 18 años de edad y tengo conocimiento personal de los hechos en este documento. Si se me llamara como testigo, podría y testificaría de manera competente a las cuestiones que se exponen a continuación.

2. Yo resido en el Distrito de Columbia. Vivo con mi esposa, mi mamá, y mis dos hijos que tienen quince y diecisiete años de edad.

3. En mayo de 2018, mi sobrina María me llamó para decirme que había viajado desde El Salvador con una caravana, que estaba en la frontera de México y los Estados Unidos, y que iba a cruzar la frontera por San Ysidro. También me dijo que estaba viajando con sus dos niños, M. de 7 años de edad y N. de 2 años de edad.

4. Aproximadamente una semana después recibí una llamada de un albergue diciéndome que los niños iban a ser separados de María, que iban rumbo a Nueva York, que

1 María me había designado como patrocinador y preguntándome que si yo estaba dispuesto a  
2 ser el patrocinador. Yo le dije a la persona que sería el patrocinador y la persona me dijo que  
3 yo podría hablar con los niños dos veces por semana. Adjunto los Documentos 1 y 2 son los  
4 formularios que me dijeron que completara a principios de mayo para que pudiera recibir a los  
5 niños de María.

6 5. Yo he hablado con el niño de 7 años en varias ocasiones desde que la familia  
7 llegó. Él me dijo que oficiales le dijeron que a él y a su hermanito los iban a llevar a un centro  
8 de detención en Washington, D.C. para estar más cerca de mí, sus tío. Recibí una llamada del  
9 niño de siete años quien pensaba que estaba en Washington, D.C., pero no era así. Él estaba en  
10 Nueva York. Una trabajadora social me dijo que los dos niños están Lutheran Youth Hostel en  
11 Nueva York.

12 6. Para ser el patrocinador la trabajadora social me dijo que tenía que proveer: 1) el  
13 acta de nacimiento de la mamá de María, 2) el acta de nacimiento de María, 3) las actas de  
14 nacimiento de los niños, y 4) mi acta de nacimiento, licencia de conducir, pasaporte y pruebas  
15 de ciudadanía. Además de completar el papeleo, tuve que proporcionar copias de mi  
16 identificación y registro policial. Yo no tenía copias de las actas de nacimiento de la mamá de  
17 María, de María o de los niños así es que tuve que contactar a personas en El Salvador para que  
18 me las enviaran. Este proceso tomo 5 días porque un amigo estaba en El Salvador y me pudo  
19 ayudar, si no, el proceso hubiera durado de 15 a 20 días.

20 7. La trabajadora social que estaba trabajando con los niños me dijo que cuando yo  
21 entregara los documentos ella obtendría aprobación en 36 horas y los niños saldrían 24 horas  
22 después de eso. No escuché de ellos en las próximas 36 horas, pero asumí que todo era válido  
23 porque ya había completado todos los formularios y seguido todas las instrucciones.

24 8. Aproximadamente una semana después que proporcione el papeleo me dijeron  
25 que me tenían que tomar la huellas. El día siguiente pedí tiempo en mi trabajo y me tomaron las  
26 huellas.

1           9.       Después de que entregué los documentos que me pidieron la trabajadora social  
2 me dijo que lo sentía mucho pero que solo había obtenido una de las aprobaciones que necesitaba  
3 para aprobar el papeleo. Ella dijo que hizo todo lo posible pero que estaba fuera de sus manos.

4           10.       A finales de mayo, recibí un poder legal de mi sobrina María dándome la  
5 autorización para cuidar de sus dos niños menores. Una copia del poder legal notariado esta  
6 adjunta como Documento 3. Yo proporcioné el poder legal a la trabajadora social a principios  
7 de junio.

8           11.       Aproximadamente una semana después me pidieron que completara una forma  
9 certificada para una verificación de antecedentes adicional. El primero de junio de 2018, yo  
10 completé el formulario que me proporciono Lutheran Social Services para obtener la  
11 autorización de recibir a los dos hijos de María. Tuve que certificar el formulario por notario.  
12 Una copia del formulario esta adjunto como Documento 4.

13           12.       Luego me informaron que pasé la verificación de antecedentes, pero necesitaban  
14 una semana más para entregarme a los niños. Hablé con el niño de siete años y me dijo que los  
15 oficiales le dijeron que a él y su hermano me los iban a entregar en una semana.

16           13.       Pero luego me dijeron que necesitaban hacer una prueba de ADN para confirmar  
17 que María es la mamá de los niños. Recientemente, la trabajadora social me dijo que hace unos  
18 días un empleado del gobierno fue a Otay Mesa donde María estaba detenida para tomarle la  
19 prueba de ADN pero María no estaba ahí. Después, cuando hablé con María ella dijo que había  
20 estado en Otay Mesa todo el tiempo.

21           14.       El 22 de junio, varias semanas después que entregué todo el papeleo me dijeron  
22 que el papeleo que entregué estaba equivocado, que el poder legal no era válido, y que no me  
23 iban a entregar a los niños. Ella dijo que hay formularios nuevos que tenemos que completar,  
24 pero no me envió los formularios hasta el viernes, 29 de junio de 2018. Esos formularios están  
25 adjuntos como Documentos 5 y 6.

26

1           15.    El 27 de junio después de pedir dinero prestado a miembros de mi familia, pude  
2 recolectar \$10,000 y pagué la fianza de María. Un agente de inmigración me dijo que María  
3 saldría el 28 de junio de 2018 y que la llevarían a estación de autobús para que ella pudiera tomar  
4 el autobús a Washington D.C. Así es que el boleto de autobús de María estaba para la fecha del  
5 28 de junio. Pero inmigración liberó a María el 27 de junio y María me llamó porque los agentes  
6 la dejaron en un McDonald's y ella no tenía a donde ir ni dormir. Ella tuvo que buscar a alguien  
7 que la alojara una noche y ahora está en camino hacia Washington D.C.

8           16.    El 28 de junio de 2018, hablé con la trabajadora social quien me dijo que  
9 tendremos que empezar el proceso de y que María tendrá que llenar la aplicación y pedir a los  
10 niños porque ya salió de detención de inmigración.

11           17.    Estoy preocupado que ahora tendremos que empezar de nuevo el proceso para  
12 reunir a los niños de María con mi familia. Todos en mi casa, incluyendo mi mamá de 78 años  
13 de edad, tendrán que someter huellas, registro policial, e identificación, y tendremos que  
14 completar un nuevo formulario. Debido a la edad de mi mamá, es difícil tomarle las huellas, y  
15 oficiales de inmigración me dijeron anteriormente que ella no tendría que someterse a las huellas  
16 de nuevo. También me informaron que María tendrá que tomarse las huellas y tendrá que  
17 presentar toda la documentación. Estoy preocupado de que María no pueda producir el papeleo  
18 necesario para poder reunirse con sus dos hijos. María no tiene pasaporte, y todo lo que tiene es  
19 tu tarjeta de identificación de El Salvador.

20           18.    Todo este proceso ha sido muy difícil para mi familia:

21           a.     Al principio cuando hablaba con M., el niño de 7 años, él estaba muy  
22 platicador y estaba emocionado porque la trabajadora social le dijo que saldría en una semana.  
23 Cuando el tiempo cuando M. esperaba salir llegó y nada pasó, él se escuchaba depresivo, no  
24 decía mucho y quería llorar. Me preguntó por qué no he venido por él todavía. La trabajadora  
25 social me dijo que M. estaba depresivo y me pidió palabras para animarlo. El 28 de junio hablé  
26 con él y está contento porque piensa que pronto va a reunirse con su mamá. Estoy más

1 preocupado por la salud mental de M. cuando se entere que tendremos que empezar el proceso  
2 de nuevo y que no va a salir pronto.

3 b. Porque solo puedo hablar por teléfono y N. es muy pequeño no he podido  
4 hablar con él. M. me dijo que N. llora todo el tiempo, y el único momento en que los dos niños  
5 se ven es en la noche. M. dijo que dejan que N. se quede con M. por la noche porque es lo único  
6 que hará que N. deje de llorar

7 c. Cuando hablo con María ella me pregunta que está pasando con los niños  
8 y se queda sin palabras cuando le digo que todavía estoy esperando la aprobación. Ella llora.  
9 Ella solamente ha podido hablar con los niños pocas veces.

10 d. La más afectada por todo esto es mi mamá. Ella crio a María después que  
11 su mamá murió cuando María tenía 8 meses de edad. Al principio, yo no quería decirle a mi  
12 mamá lo que estaba pasando porque ella tiene 78 años de edad y estaba preocupado que si le  
13 decía se iba a poner mal de salud. Yo solo le dije que María y los niños habían cruzado la  
14 frontera, pero estaban detenidos. Después de ver las noticias, mi mamá exigió que le dijera que  
15 estaba pasando. Mi mamá se puso mal de salud cuando le dije que los niños habían sido  
16 separados de María. Desde que mi mamá se enteró de la separación familiar ha tenido un dolor  
17 de cabeza intenso y yo tuve que llevarla al doctor. Estoy muy preocupado por la salud de mi  
18 mamá. Para María, la separación de sus niños repite la historia de cuando ella perdió a su mamá.

19 e. Por mi parte, este proceso ha sido muy depresivo y frustrante. Cuando al  
20 fin pensaba que me iban a dar los niños me dicen que siempre no. También he tenido que  
21 descansar de mi trabajo para hacer todo lo que me han pedido que haga.

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19. Tengo la esperanza que María, M., y N. se reunirán pronto.

Declaro bajo pena de perjurio bajo las leyes del Estado de California y las leyes de los Estados Unidos que lo anterior es verdadero y correcto.

Fecha este 30 día de Junio de 2018 en Washington D.C.



FRANCISCO SERRANO

# **EXHIBIT 1**





U.S. Department of Health and Human Services

Office of Refugee Resettlement  
Sponsor Care Agreement, Rev. 04/30/2012

**OFICINA DE REUBICACIÓN DE REFUGIADOS**  
División de Servicios de Niños  
**ACUERDO DE CUIDADO DEL PATROCINADOR**

Nombre del menor: M. A. M. S. Número del menor A: \_\_\_\_\_  
Alias (si los tuviera): \_\_\_\_\_ Fecha de nacimiento del menor: \_\_\_\_\_/10  
Nombre del patrocinador: Francisco de Jesús Serrano Fecha: 05/10/18

Le solicitó a la Oficina de Reubicación de Refugiados (Office of Refugee Resettlement, ORR) patrocinar a un niño extranjero no acompañado en el cuidado y la custodia del gobierno federal conforme al acuerdo extrajudicial estipulado *Flores v. Reno*, número 85-4544-RJK (Px) (C.D. Cal., 17 de enero de 1997), sección 462 del Homeland Security Act de 2002 y la sección 235 del William Wilberforce Trafficking Victims Protection Reauthorization Act de 2008. Si se aprueba la solicitud de patrocinio, recibirá un formulario de *Verificación de liberación* de ORR y se celebrará un acuerdo de custodia con el gobierno federal en el cual acepta cumplir con las siguientes disposiciones mientras el menor esté en su cuidado:

- Proporcionar el bienestar mental y físico del menor, que incluye, entre otros, alimentos, refugio, vestimenta, educación, atención médica y otros servicios según sea necesario.
- Si no es el tutor legal ni el padre o la madre del menor, haga los mejores esfuerzos por establecer una custodia legal con el tribunal local dentro de un tiempo razonable.
- Asistir a un programa de orientación legal proporcionado por el Departamento de Justicia (Department of Justice, DOJ), o programa de orientación legal para custodios (patrocinadores) de la Oficina Ejecutiva para la Revisión de la Inmigración (Executive Office for Immigration Review, EOIR), si está disponible en el lugar donde reside.
- Según dónde esté pendiente el caso de inmigración del menor, notificar al Tribunal de Inmigración o al Tribunal de Apelaciones de Inmigración local en un período de cinco (5) días de todo cambio de dirección o número de teléfono del menor, usando el formulario de cambio de dirección de extranjeros (formulario EOIR-33). Además, si es necesario, presentar una petición de cambio de competencia territorial a nombre del menor. La petición de cambio de competencia territorial debe contener información especificada por el Tribunal de Inmigración. Tenga en cuenta que la petición de cambio de competencia territorial puede requerir la ayuda de un abogado. Para obtener asesoramiento sobre la "petición de cambio de competencia territorial", consulte el Manual de práctica del Tribunal de Inmigración en <http://1.usa.gov/e0H9zL>. Para obtener información sobre casos de inmigración, comuníquese con el sistema de información de casos de inmigración de EOIR llamando al 1-800-898-7180. Visite el sitio web de EOIR para obtener información adicional en: <http://www.justice.gov/eoir/formslist.htm>.
- Notificar al Departamento de Seguridad del Territorio Nacional (Department of Homeland Security, DHS) o a Servicios de Ciudadanía e Inmigración de los Estados Unidos (U.S. Citizenship and Immigration Services) en un período de diez (10) días de todo cambio de dirección, presentando la Tarjeta de Cambio de Dirección de Extranjero (AR-11) o de manera electrónica en <http://1.usa.gov/Ac5MP>.
- Asegurar la presencia del menor en todos los procedimientos futuros ante DHS o Inmigración y Seguridad de Aduanas (Immigration and Customs Enforcement, ICE) y el Departamento de Justicia (Department of Justice, DOJ) o EOIR. Para obtener información sobre casos de inmigración, comuníquese con el sistema de información de casos de EOIR llamando al: 1-800-898-7180.
- Asegurar que el menor se presente ante ICB para la expulsión de los Estados Unidos si un juez de inmigración emite una orden de expulsión o una orden de salida voluntaria. Se asigna al menor un oficial de deportación para los procedimientos de expulsión.

13. ¿Alguno de los ocupantes de su hogar sufre de alguna enfermedad grave y contagiosa (p. ej., TB, SIDA, hepatitis)? Si así fuera, por favor, explíquelo: *NO*

14(a). ¿Usted o alguno de los ocupantes de su hogar han sido acusados o condenados por un delito (que no sea una infracción menor de tránsito, p. ej., velocidad excesiva, multa por mal estacionamiento)?

NO  SÍ

14(b). ¿Usted o alguna persona en su hogar han sido investigados por abuso físico, sexual, descuido o abandono de un menor?

NO  SÍ

Si usted respondió "SÍ" a cualquiera de las preguntas 14 (a) o 14(b), sírvase adjuntar una lista a este formulario con la siguiente información para cada cargo/condena:

- (1) Nombre de la persona involucrada; (2) lugar y fecha del incidente; (3) descripción del incidente;
- (4) Resolución sobre el incidente (p. ej., desestimación de cargos, multado, encarcelado, período de prueba); (5) Copia del(de los) registro(s) judicial(es), registro(s) policial(es), y/o registro(s) de la agencia de servicio social gubernamental relacionado(s) con el(las) incidente(s)

15. Si existiese la posibilidad que usted deba salir de los Estados Unidos, o ser incapaz de cuidar al menor, ¿quién supervisaría al menor en su ausencia?:

Nombre del posible cuidador adulto: *Martini del Carayan Velasquez*

Fecha de nacimiento del posible cuidador adulto: *1/80*

Información de contacto (dirección y número de teléfono) del posible cuidador adulto: *Washington DC*

Relación con el menor, si hay alguna: *tia politica por ser la pareja del tío*

Resuma su plan de cuidado en caso de que usted tenga que salir de los Estados Unidos o sea incapaz de cuidar al menor:

*dejar los billetes pagados como renta o mortgage como suficiente dinero por cual quita emergencia etc*

Declaro y afirmo bajo pena de perjurio que la información contenida en esta solicitud es verdadera y precisa, según mi leal saber y entender. Doy fe de que todos los documentos que presento o las copias de dichos documentos están libres de error y de fraude.

Doy fe además que me atenderé a las instrucciones contenidas en el Acuerdo del Patrocinador sobre el Cuidado. Velaré por el bienestar físico y mental del menor. También cumpliré con las leyes de mi estado respecto del cuidado de este menor, lo que incluye la inscripción del menor en la escuela, la provisión de atención médica cuando sea necesaria, la protección del menor contra el abuso, descuido y abandono, y cualquier otro requisito no contenido en el presente.

SU FIRMA: *[Signature]*

FECHA: *05/10/18*



**OFICINA DE REUBICACIÓN DE REFUGIADOS**  
**División de servicios para niños**  
**SOLICITUD DE REUNIFICACIÓN FAMILIAR**

1. Nombre del menor: M [redacted] A [redacted] M [redacted] S [redacted]	2. Su relación con el menor: TIO
3. Su nombre (de usted): Francisco de Jesus Serrano	4. Cualquier otro nombre que usted haya utilizado:
5. Su país de origen (de usted): El Salvador	6. Su fecha de nacimiento (de usted): [redacted] / 7A
7. Número(s) de teléfono donde nos podemos comunicar con usted: [redacted]	8. Su correo electrónico (si lo tiene) o número de fax: [redacted]
9. El domicilio donde residirán usted y el menor: [redacted] Washington, D.C. [redacted]	10. ¿Qué idiomas habla?: español y un poco inglés

11. Información de los ocupantes del hogar. (Si necesita más espacio, sírvase adjuntar una lista de los ocupantes del hogar a este formulario)

Nombre	Fecha de Nacimiento	Relación con el menor (p. ej., madre, padre)	Relación con usted (el patrocinador)
Francisco Serrano	[redacted] / 7A	Tio	soy el patrocinador
Marleni Velazquez	[redacted] / 80	Tia politica	esposa
Marcos Serrano	[redacted] / 10	tía Abuela	Mamá
J [redacted] S [redacted]	[redacted] / 01	Prima	hija
K [redacted] S [redacted]	[redacted] / 03	Primo	hijo

12. Información financiera: Sírvase explicar cómo va a mantener financieramente al menor:

tanto la vivienda como los alimentos  
salud medica Escuela  
Sera igual que mis propios hijos  
Amor, cariño atención etc



**OFICINA DE REUBICACIÓN DE REFUGIADOS**  
**División de Servicios para Niños**  
**LISTA DE VERIFICACIÓN FAMILIAR PARA PATROCINADORES**

**Formularios que deberán ser completados, firmados y devueltos a su trabajador social**

- He completado y firmado la Autorización para la Divulgación de Información
- He completado y firmado la Solicitud para la reunificación familiar

**Formularios que deberán ser leídos y mantenidos en su poder**

- He leído la Carta introductoria del Paquete para la Reunificación Familiar
- He leído el Acuerdo de Cuidado del Patrocinador
- He leído la Lista de Verificación para Patrocinadores
- He leído el Programa General de Orientación Legal para Custodios
- He leído el Manual para el Patrocinador
- He leído las Instrucciones para la toma de huellas digitales por si tienen que ser sometidas.
- Carta de Designación del Cuidado de un Menor para el patrocinador que NO es uno de los padres del menor ni su tutor legal.

**Documentos probatorios**

Por favor proporcione una copia de los siguientes documentos que figuran a continuación. Por favor tome en cuenta que tanto la Oficina de Reubicación de Refugiados (Office of Refugee Resettlement, ORR) como la División de Servicios de Niños no Acompañados (Division of Children's Services, DCS) pueden rechazar su solicitud como patrocinador si falta cualquier elemento de la información solicitada o si esa misma está incompleta o no es correcta. En el caso de que no pueda proveer los documentos requeridos, adjunte una explicación, junto con la Solicitud de Reunificación Familiar, en la que indique qué tipo de documentación de respaldo no puede presentar y la razón. Tenga en cuenta que su explicación sobre cualquier documentación faltante quedará sujeta a la aceptación de ORR/DCS.

**1. Prueba de su identidad:**

- Una copia de una identificación emitida por el gobierno, tal como:
  - a. Licencia de conducir o tarjeta de identificación emitida por el estado
  - b. Documento de identidad (con foto) de su país de origen (p. ej., cédula)
  - c. Pasaporte

Y

- Una copia de su certificado de nacimiento

**2. Prueba de la identidad del menor:**

- Una copia del certificado de nacimiento del menor

**3. Prueba de Parentesco:**

- Entregue copias de certificados de nacimiento, de matrimonio, registros judiciales, registros de la tutoría u otros documentos, a fin de aportar evidencia de la relación entre usted y el menor.

**4. Registros Legales (si corresponde)**

Si usted respondió "SI" a las preguntas 14(a) y/o 14(b) en la *Solicitud de Reunificación Familiar*, aporte registros judiciales, policiales, y/o de los servicios sociales gubernamentales relacionados con el/ los incidente(s).

**5. Si usted NO es uno de los padres o el tutor legal de este menor, por favor proporcione de uno de los siguientes documentos como comprobante de domicilio. Si usted SI es el padre o el tutor legal del menor, no es necesario que entregue un comprobante de domicilio.**

- a. Una copia de su renta actual
- b. Una copia del estado de cuenta actual de su hipoteca
- c. Carta del propietario, en la que se confirme su domicilio.
- d. Una copia de su correspondencia, preferiblemente una factura de servicio público dirigida a usted, correspondiendo a los últimos dos meses.

**OFICINA DE REUBICACIÓN DE REFUGIADOS**  
**División de Servicios de Niños**  
**AUTORIZACIÓN PARA LA DIVULGACIÓN DE INFORMACIÓN**

**INFORMACIÓN REQUERIDA PARA LA INVESTIGACIÓN DE ANTECEDENTES**

NOMBRE DEL MENOR: <b>M A M S</b>				FECHA DE NACIMIENTO DEL MENOR: <b>2010</b>					
<b>INFORMACIÓN DEL PATROCINADOR:</b>						<b>FECHA DE NACIMIENTO</b>			
Apellido <b>Serrano</b>		Primer nombre <b>FRANCISCO</b>		Nombre del medio (sufrido) <b>DE JESUS</b>		Mes	Día	Año <b>1974</b>	
SEXO: <input checked="" type="checkbox"/> MASC. <input type="checkbox"/> FEM		Raza <b>Latino Americano</b>		Color de ojos <b>Cafe</b>		NÚMERO DE SEGURO SOCIAL (opcional)			
Altura <b>5-03</b>		Peso <b>131</b>		Color de pelo <b>NEGRO</b>					
<b>LUGAR DE NACIMIENTO:</b> (Use el código de dos letras para el estado)									
Ciudad <b>Nueva San Salvador</b>		Condado <b>Santa Tecla</b>		Estado <b>La Libertad</b>		País <b>El Salvador</b>			
<b>OTROS NOMBRES UTILIZADOS Y SUS FECHAS DE USO:</b>									
Nombre		Desde: Mes Año		Hasta: Mes Año		Nombre		Desde: Mes Año	Hasta: Mes Año
<b>RESIDENCIAS EN LOS ÚLTIMOS 5 AÑOS:</b>									
DESDE: Mes/Año <b>03/2004</b>		HASTA: Mes/Año <b>Presente</b>		Apartamento nro.		Ciudad (condado) <b>Washington</b>		Estado <b>D.C.</b>	Código postal
DESDE: Mes/Año		HASTA: Mes/Año		Apartamento nro.		Ciudad (condado)		Estado	Código postal
DESDE: Mes/Año		HASTA: Mes/Año		Apartamento nro.		Ciudad (condado)		Estado	Código postal
DESDE: Mes/Año		HASTA: Mes/Año		Apartamento nro.		Ciudad (condado)		Estado	Código postal
<b>CIUDADANÍA DE LOS ESTADOS UNIDOS</b> Si el patrocinador es ciudadano estadounidense, pero no nació en los EE. UU., brinde información acerca de una o más de las siguientes pruebas de ciudadanía.									
<b>Certificado de naturalización</b>									
Tribunal <b>Supreme Court</b>		Ciudad <b>Washington</b>		Estado <b>DC</b>		Número de certificado		Mes/Día/Año de emisión <b>11/15/16</b>	
<b>Certificado de ciudadanía (¿Dónde se emitió el certificado?)</b>									
Ciudad <b>A</b>				Estado <b>A</b>		Número de certificado <b>A</b>		Mes/Día/Año de emisión <b>A</b>	
<b>Formulario 240 del Departamento de Estado: Informe del nacimiento en el extranjero de un ciudadano de los Estados Unidos</b>									
Indique la fecha en que se preparó el formulario y brinde una explicación si fuese necesario.		Mes/Día/Año		Explicación					
<b>Pasaporte de los EE. UU.</b>									
Puede ser tanto un pasaporte de los EE. UU. actual como anterior.				Número de pasaporte		Mes/Día/Año de emisión <b>09/03/2017</b>			
<b>DOBLE CIUDADANÍA:</b> Si el sujeto tiene (o tuvo) doble ciudadanía, de los Estados Unidos y de otro país, indique el nombre de dicho país en el espacio de la derecha.						País <b>El Salvador</b>			
<b>EXTRANJERO</b> Si el sujeto es extranjero, indique la siguiente información:									
Lugar de entrada a los Estados Unidos		Ciudad		Estado		Fecha de entrada a los EE. UU. Mes Día Año		Número de registro del extranjero	País de ciudadanía

\* No es obligatorio indicar el número de Seguro Social. Sin embargo, si no lo indica, es posible que la ORR no pueda realizar la investigación de antecedentes necesaria para el procedimiento de reunificación.

**OFICINA DE REUBICACIÓN DE REFUGIADOS**  
**División de Servicios de Niños**  
**AUTORIZACIÓN PARA LA DIVULGACIÓN DE INFORMACIÓN**

*Lea cuidadosamente esta autorización, luego firmela y féchela con tinta negra.*

Autorizo a cualquier investigador, agente especial, empleado, contratista, cesionario u otro representante debidamente autorizado que trabaje en nombre de la Oficina de Reubicación de Refugiados (Office of Refugee Resettlement) que esté llevando a cabo la investigación de mis antecedentes y la evaluación de patrocinio a obtener información a fin de evaluar mi capacidad para brindarle el debido cuidado y lugar a un menor y para proveerle los servicios posteriores a su liberación, según sea necesario. Autorizo a cualquier agencia de justicia penal federal, estatal o local; agencia para el bienestar infantil federal, estatal, local o privada; agencia federal de inmigración o cualquier otra fuente de información, tal como escuelas, tribunales, proveedores de tratamiento, funcionarios de libertad condicional/bajo palabra, profesionales de la salud mental u otras referencias, a divulgar, tanto verbalmente como por escrito, información acerca de todo historial delictivo, cargos o dudas sobre abuso y descuido infantil, situación migratoria pasada y presente, problemas de salud mental, abuso de sustancias, violencia doméstica o cualquier otra información psicosocial recopilada acerca de mi persona.

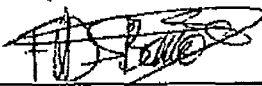
Autorizo a los custodios de los registros y fuentes de la información sobre mi persona, a divulgar tal información ante la solicitud del investigador, agente especial, empleado, contratista, cesionario u otro representante debidamente acreditado de la Oficina de Reubicación de Refugiados.

Entiendo que la información divulgada por cualquier custodio de mis registros y otras fuentes de la información acerca de mi persona es para uso oficial por parte del gobierno de los EE. UU., sus empleados, cesionarios, contratistas y otro personal delegado para los fines expresados más arriba y que puede ser revelada por el gobierno de los EE. UU. solamente en la forma autorizada por la ley.

Entiendo que esta información se convertirá en propiedad de la Oficina de Reubicación de Refugiados y que puede ser revisada por sus empleados, cesionarios, contratistas y delegados. También entiendo que la Oficina de Reubicación de Refugiados puede compartir esta información con los empleados y contratistas de otras agencias federales.

Por el presente renuncio a cualquier reclamo o derecho en virtud de las leyes de los Estados Unidos contra el gobierno federal, sus empleados, cesionarios, contratistas o delegados por usar legalmente cualquier información recopilada durante la búsqueda de mi historial delictivo, información relativa al bienestar infantil, situación migratoria pasada o presente, cualquier información contenida en mi solicitud de patrocinio y en la documentación de respaldo y la información recopilada de cualquier otra fuente, en forma oral o escrita, relacionada con esta solicitud de patrocinio. Por el presente renuncio a toda demanda o acuerdo previo con cualquier agencia federal estatal, local o privada que pudiera impedirle al delegado oficial de la Oficina de Reubicación de Refugiados obtener la información solicitada.

Las copias de esta autorización que contengan mi firma son tan válidas como el original. Esta autorización es válida por un (1) año a partir de la fecha de su firma.

Firma (firmar con tinta) 	Nombre completo (a máquina o en letra de imprenta legible) Francisco de Jesus Serrano	Fecha de la firma 05/10/18
Otros nombres que usted haya usado (alias)	Fecha de nac. del patrocinador [redacted] / 1974	Número del Seguro Social (opcional)* [redacted]
Domicilio actual [redacted] Washington	Estado D.C.	Código postal [redacted]
Nro. de teléfono de su hogar (incluya el código de área) [redacted]		

\*No es obligatorio indicar su número de Seguro Social. Sin embargo, si no lo indica, es posible que la ORR no pueda realizar la investigación de antecedentes necesaria para el procedimiento de reunificación.

# **EXHIBIT 2**



U.S. Department of Health and Human Services

Office of Refugee Resettlement  
Sponsor Care Agreement, Rev. 04/30/2012

**OFICINA DE REUBICACIÓN DE REFUGIADOS**  
División de Servicios de Niños  
**ACUERDO DE CUIDADO DEL PATROCINADOR**

Nombre del menor: N. A. G. Número del menor A: 115  
Alias (si los tuviera): \_\_\_\_\_ Fecha de nacimiento del menor: \_\_\_\_\_  
Nombre del patrocinador: Francisco de Jesus Serrano Fecha: 05/10/18

Le solicitó a la Oficina de Reubicación de Refugiados (Office of Refugee Resettlement, ORR) patrocinar a un niño extranjero no acompañado en el cuidado y la custodia del gobierno federal conforme al acuerdo extrajudicial estipulado Flores v. Reno, número 85-4544-RJK (Px) (C.D. Cal., 17 de enero de 1997), sección 462 del Homeland Security Act de 2002 y la sección 235 del William Wilberforce Trafficking Victims Protection Reauthorization Act de 2008. Si se aprueba la solicitud de patrocinio, recibirá un formulario de *Verificación de liberación* de ORR y se celebrará un acuerdo de custodia con el gobierno federal en el cual acepta cumplir con las siguientes disposiciones mientras el menor esté en su cuidado:

- Proporcionar el bienestar mental y físico del menor, que incluye, entre otros, alimentos, refugio, vestimenta, educación, atención médica y otros servicios según sea necesario.
- Si no es el tutor legal ni el padre o la madre del menor, haga los mejores esfuerzos por establecer una custodia legal con el tribunal local dentro de un tiempo razonable.
- Asistir a un programa de orientación legal proporcionado por el Departamento de Justicia (Department of Justice, DOJ), o programa de orientación legal para custodios (patrocinadores) de la Oficina Ejecutiva para la Revisión de la Inmigración (Executive Office for Immigration Review, EOIR), si está disponible en el lugar donde reside.
- Según dónde esté pendiente el caso de inmigración del menor, notificar al Tribunal de Inmigración o al Tribunal de Apelaciones de Inmigración local en un período de cinco (5) días de todo cambio de dirección o número de teléfono del menor, usando el formulario de cambio de dirección de extranjeros (formulario EOIR-33). Además, si es necesario, presentar una petición de cambio de competencia territorial a nombre del menor. La petición de cambio de competencia territorial debe contener información especificada por el Tribunal de Inmigración. Tenga en cuenta que la petición de cambio de competencia territorial puede requerir la ayuda de un abogado. Para obtener asesoramiento sobre la "petición de cambio de competencia territorial", consulte el Manual de práctica del Tribunal de Inmigración en <http://1.usa.gov/e0119z1>. Para obtener información sobre casos de inmigración, comuníquese con el sistema de información de casos de inmigración de EOIR llamando al 1-800-898-7180. Visite el sitio web de EOIR para obtener información adicional en: <http://www.justice.gov/eoir/forms.html>.
- Notificar al Departamento de Seguridad del Territorio Nacional (Department of Homeland Security, DHS) o a Servicios de Ciudadanía e Inmigración de los Estados Unidos (U.S. Citizenship and Immigration Services) en un período de diez (10) días de todo cambio de dirección, presentando la Tarjeta de Cambio de Dirección de Extranjero (AR-11) o de manera electrónica en <http://1.usa.gov/Ac5MP>.
- Asegurar la presencia del menor en todos los procedimientos futuros ante DHS o Inmigración y Seguridad de Aduanas (Immigration and Customs Enforcement, ICE) y el Departamento de Justicia (Department of Justice, DOJ) o EOIR. Para obtener información sobre casos de inmigración, comuníquese con el sistema de información de casos de EOIR llamando al: 1-800-898-7180.
- Asegurar que el menor se presente ante ICE para la expulsión de los Estados Unidos si un juez de inmigración emite una orden de expulsión o una orden de salida voluntaria. Se asigna al menor un oficial de deportación para los procedimientos de expulsión.





**OFICINA DE REUBICACIÓN DE REFUGIADOS**  
**División de servicios para niños**  
**SOLICITUD DE REUNIFICACIÓN FAMILIAR**

1. Nombre del menor: M [redacted] A [redacted] G [redacted] S [redacted]	2. Su relación con el menor: Hijo
3. Su nombre (de usted): Francisco de Jesus Serrano	4. Cualquier otro nombre que usted haya utilizado:
5. Su país de origen (de usted): El Salvador	6. Su fecha de nacimiento (de usted): [redacted] / 1976
7. Número(s) de teléfono donde nos podemos comunicar con usted: [redacted]	8. Su correo electrónico (si lo tiene) o número de fax: [redacted]
9. El domicilio donde residirán usted y el menor: Washington D.C. [redacted]	10. ¿Qué idiomas habla?: Español y un poco ingles

11. Información de los ocupantes del hogar. (Si necesita más espacio, sírvase adjuntar una lista de los ocupantes del hogar a este formulario)

Nombre	Fecha de Nacimiento	Relación con el menor (p. ej., madre, padre)	Relación con usted (el patrocinador)
Martina Velasquez	[redacted] / 80	Tía política	es posca
Marcos Serrano	[redacted] / 80	bisa Abuela	Mama
J [redacted] S [redacted]	[redacted] / 01	Prima	hija
F [redacted] S [redacted]	[redacted] / 03	Primo	hijo

12. Información financiera: Sírvase explicar cómo va a mantener financieramente al menor:

tanto la beveruda como los Alimentos  
Salud medica Escuela  
Será Igual que mis propios hijos  
Amor, cariño Atencion etc.

13. ¿Alguno de los ocupantes de su hogar sufre de alguna enfermedad grave y contagiosa (p. ej., TB, SIDA, hepatitis)? Si así fuera, por favor, explíquelo:

NO

14(a). ¿Usted o alguno de los ocupantes de su hogar han sido acusados o condenados por un delito (que no sea una infracción menor de tránsito, p. ej., velocidad excesiva, multa por mal estacionamiento)?

NO  SÍ

14(b). ¿Usted o alguna persona en su hogar han sido investigados por abuso físico, sexual, descuido o abandono de un menor?

NO  SÍ

Si usted respondió "SÍ" a cualquiera de las preguntas 14 (a) o 14(b), sírvase adjuntar una lista a este formulario con la siguiente información para cada cargo/condena:

- (1) Nombre de la persona involucrada;
- (2) lugar y fecha del incidente;
- (3) descripción del incidente;
- (4) Resolución sobre el incidente (p. ej., desestimación de cargos, multado, encarcelado, período de prueba);
- (5) Copia del(de los) registro(s) judicial(es), registro(s) policial(es), y/o registro(s) de la agencia de servicio social gubernamental relacionado(s) con el(los) incidente(s)

15. Si existiese la posibilidad que usted deba salir de los Estados Unidos, o ser incapaz de cuidar al menor, ¿quién supervisaría al menor en su ausencia?:

Nombre del posible cuidador adulto: *Marlene del Carmen Velasquez*

Fecha de nacimiento del posible cuidador adulto: *[redacted] / 80*

Información de contacto (dirección y número de teléfono) del posible cuidador adulto:

Relación con el menor, si hay alguna: *Tía política por ser la pareja del tío*

Resuma su plan de cuidado en caso de que usted tenga que salir de los Estados Unidos o sea incapaz de cuidar al menor:

*dejar los billes pagados como renta o mortgage comida suficiente  
dinero por cualquier emergencia e.t.c.*

Declaro y afirmo bajo pena de perjurio que la información contenida en esta solicitud es verdadera y precisa, según mi leal saber y entender. Doy fe de que todos los documentos que presento o las copias de dichos documentos están libres de error y de fraude.

Doy fe además que me atenderé a las instrucciones contenidas en el Acuerdo del Patrocinador sobre el Cuidado. Velaré por el bienestar físico y mental del menor. También cumpliré con las leyes de mi estado respecto del cuidado de este menor, lo que incluye la inscripción del menor en la escuela, la provisión de atención médica cuando sea necesaria, la protección del menor contra el abuso, descuido y abandono, y cualquier otro requisito no contenido en el presente.

SU FIRMA: *[Signature]*

FECHA: *05/10/18*



**OFICINA DE REUBICACIÓN DE REFUGIADOS**  
**División de Servicios para Niños**  
**LISTA DE VERIFICACIÓN FAMILIAR PARA PATROCINADORES**

**Formularios que deberán ser completados, firmados y devueltos a su trabajador social**

- He completado y firmado la Autorización para la Divulgación de Información
- He completado y firmado la Solicitud para la reunificación familiar

**Formularios que deberán ser leídos y mantenidos en su poder**

- He leído la Carta introductoria del Paquete para la Reunificación Familiar
- He leído el Acuerdo de Cuidado del Patrocinador
- He leído la Lista de Verificación para Patrocinadores
- He leído el Programa General de Orientación Legal para Custodios
- He leído el Manual para el Patrocinador
- He leído las Instrucciones para la toma de huellas digitales por si tienen que ser sometidas.
- Carta de Designación del Cuidado de un Menor para el patrocinador que NO es uno de los padres del menor ni su tutor legal.

**Documentos probatorios**

Por favor proporcione una copia de los siguientes documentos que figuran a continuación. Por favor tome en cuenta que tanto la Oficina de Reubicación de Refugiados (Office of Refugee Resettlement, ORR) como la División de Servicios de Niños no Acompañados (Division of Children's Services, DCS) pueden rechazar su solicitud como patrocinador si falta cualquier elemento de la información solicitada o si esa misma está incompleta o no es correcta. En el caso de que no pueda proveer los documentos requeridos, adjunte una explicación, junto con la Solicitud de Reunificación Familiar, en la que indique qué tipo de documentación de respaldo no puede presentar y la razón. Tenga en cuenta que su explicación sobre cualquier documentación faltante quedará sujeta a la aceptación de ORR/DCS.

**1. Prueba de su Identidad:**

- Una copia de una identificación emitida por el gobierno, tal como:
  - a. Licencia de conducir o tarjeta de identificación emitida por el estado
  - b. Documento de identidad (con foto) de su país de origen (p. ej., cédula)
  - c. Pasaporte

**Y**

- Una copia de su certificado de nacimiento

**2. Prueba de la identidad del menor:**

- Una copia del certificado de nacimiento del menor

**3. Prueba de Parentesco:**

- Entregue copias de certificados de nacimiento, de matrimonio, registros judiciales, registros de la tutoría u otros documentos, a fin de aportar evidencia de la relación entre usted y el menor.

**4. Registros Legales (si corresponde)**

Si usted respondió "SI" a las preguntas 14(a) y/o 14(b) en la *Solicitud de Reunificación Familiar*, aporte registros judiciales, policiales, y/o de los servicios sociales gubernamentales relacionados con el/ los incidente(s).

**5. Si usted NO es uno de los padres o el tutor legal de este menor, por favor proporcione de uno de los siguientes documentos como comprobante de domicilio. Si usted SI es el padre o el tutor legal del menor, no es necesario que entregue un comprobante de domicilio.**

- a. Una copia de su renta actual
- b. Una copia del estado de cuenta actual de su hipoteca
- c. Carta del propietario, en la que se confirme su domicilio.
- d. Una copia de su correspondencia, preferiblemente una factura de servicio público dirigida a usted, correspondiendo a los últimos dos meses.

**OFICINA DE REUBICACIÓN DE REFUGIADOS**  
**División de Servicios de Niños**  
**AUTORIZACIÓN PARA LA DIVULGACIÓN DE INFORMACIÓN**

**INFORMACIÓN REQUERIDA PARA LA INVESTIGACIÓN DE ANTECEDENTES**

<b>NOMBRE DEL MENOR:</b> N A S		<b>FECHA DE NACIMIENTO DEL MENOR:</b> /2015				
<b>INFORMACIÓN DEL PATROCINADOR:</b>			<b>FECHA DE NACIMIENTO</b>			
Apellido <b>Serrano</b>	Primer nombre <b>Francisco</b>	Nombre del medio (sufijo) <b>de Jesús</b>	Mes <input type="checkbox"/> Año <b>1976</b>			
SEXO: <input checked="" type="checkbox"/> MASC. <input type="checkbox"/> FEM.	Raza <b>latino Americano</b>	Color de ojos <b>Cafes</b>	<b>NÚMERO DE SEGURO SOCIAL (opcional)*</b>			
Altura <b>5-03</b>	Peso <b>131</b>	Color de pelo <b>negro</b>				
<b>LUGAR DE NACIMIENTO:</b> (Use el código de dos letras para el estado)						
Ciudad <b>Nueva San Salvador</b>	Condado <b>San Rafael</b>	Estado <b>la libertad</b>	País <b>El Salvador</b>			
<b>OTROS NOMBRES UTILIZADOS Y SUS FECHAS DE USO:</b>						
Nombre	Desde: Mes Año	Hasta: Mes Año	Nombre	Desde: Mes Año	Hasta: Mes Año	
<b>RESIDENCIAS EN LOS ÚLTIMOS 5 AÑOS:</b>						
DESDE: Mes/Año <b>03/2007</b>	HASTA: Mes/Año <b>Presente</b>	Domicilio	Apartamento nro.	Ciudad (condado) <b>Washington</b>	Estado <b>D.C.</b>	Código postal
DESDE: Mes/Año	HASTA: Mes/Año	Domicilio	Apartamento nro.	Ciudad (condado)	Estado	Código postal
DESDE: Mes/Año	HASTA: Mes/Año	Domicilio	Apartamento nro.	Ciudad (condado)	Estado	Código postal
DESDE: Mes/Año	HASTA: Mes/Año	Domicilio	Apartamento nro.	Ciudad (condado)	Estado	Código postal
<b>CIUDADANÍA DE LOS ESTADOS UNIDOS</b> Si el patrocinador es ciudadano estadounidense, pero no nació en los EE. UU., brinde información acerca de una o más de las siguientes pruebas de ciudadanía.						
<b>Certificado de naturalización</b>						
Tribunal	Ciudad	Estado	Número de certificado	Mes/Día/Año de emisión		
<b>Certificado de ciudadanía (¿Dónde se emitió el certificado?)</b>						
Ciudad <b>Supreme Court Washington</b>	Estado <b>D.C.</b>	Número de certificado	Mes/Día/Año de emisión			
<b>Formulario 240 del Departamento de Estado: Informe del nacimiento en el extranjero de un ciudadano de los Estados Unidos</b>						
Indique la fecha en que se preparó el formulario y brinde una explicación si fuese necesario.	Mes/Día/Año	Explicación				
<b>Pasaporte de los EE. UU.</b>						
Puede ser tanto un pasaporte de los EE. UU. actual como anterior.			Número de pasaporte	Mes/Día/Año de emisión <b>09/03/2017</b>		
<b>DOBLE CIUDADANÍA:</b> Si el sujeto tiene (o tuvo) doble ciudadanía, de los Estados Unidos y de otro país, indique el nombre de dicho país en el espacio de la derecha.				País <b>El Salvador</b>		
<b>EXTRANJERO</b> Si el sujeto es extranjero, indique la siguiente información:						
Lugar de entrada a los Estados Unidos	Ciudad	Estado	Fecha de entrada a los EE. UU. Mes Día Año	Número de registro del extranjero	País de ciudadanía	

\* No es obligatorio indicar el número de Seguro Social. Sin embargo, si no lo indica, es posible que la ORR no pueda realizar la investigación de antecedentes necesaria para el procedimiento de reunificación.

**OFICINA DE REUBICACIÓN DE REFUGIADOS**  
**División de Servicios de Niños**  
**AUTORIZACIÓN PARA LA DIVULGACIÓN DE INFORMACIÓN**

*Lea cuidadosamente esta autorización, luego fírmela y féchela con tinta negra.*

Autorizo a cualquier investigador, agente especial, empleado, contratista, cesionario u otro representante debidamente autorizado que trabaje en nombre de la Oficina de Reubicación de Refugiados (Office of Refugee Resettlement) que esté llevando a cabo la investigación de mis antecedentes y la evaluación de patrocinio a obtener información a fin de evaluar mi capacidad para brindarle el debido cuidado y lugar a un menor y para proveerle los servicios posteriores a su liberación, según sea necesario. Autorizo a cualquier agencia de justicia penal federal, estatal o local; agencia para el bienestar infantil federal, estatal, local o privada; agencia federal de inmigración o cualquier otra fuente de información, tal como escuelas, tribunales, proveedores de tratamiento, funcionarios de libertad condicional/bajo palabra, profesionales de la salud mental u otras referencias, a divulgar, tanto verbalmente como por escrito, información acerca de todo historial delictivo, cargos o dudas sobre abuso y descuido infantil, situación migratoria pasada y presente, problemas de salud mental, abuso de sustancias, violencia doméstica o cualquier otra información psicosocial recopilada acerca de mi persona.

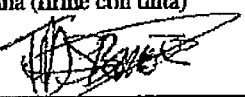
Autorizo a los custodios de los registros y fuentes de la información sobre mi persona, a divulgar tal información ante la solicitud del investigador, agente especial, empleado, contratista, cesionario u otro representante debidamente acreditado de la Oficina de Reubicación de Refugiados.

Entiendo que la información divulgada por cualquier custodio de mis registros y otras fuentes de la información acerca de mi persona es para uso oficial por parte del gobierno de los EE. UU., sus empleados, cesionarios, contratistas y otro personal delegado para los fines expresados más arriba y que puede ser revelada por el gobierno de los EE. UU. solamente en la forma autorizada por la ley.

Entiendo que esta información se convertirá en propiedad de la Oficina de Reubicación de Refugiados y que puede ser revisada por sus empleados, cesionarios, contratistas y delegados. También entiendo que la Oficina de Reubicación de Refugiados puede compartir esta información con los empleados y contratistas de otras agencias federales.

Por el presente renuncio a cualquier reclamo o derecho en virtud de las leyes de los Estados Unidos contra el gobierno federal, sus empleados, cesionarios, contratistas o delegados por usar legalmente cualquier información recopilada durante la búsqueda de mi historial delictivo, información relativa al bienestar infantil, situación migratoria pasada o presente, cualquier información contenida en mi solicitud de patrocinio y en la documentación de respaldo y la información recopilada de cualquier otra fuente, en forma oral o escrita, relacionada con esta solicitud de patrocinio. Por el presente renuncio a toda demanda o acuerdo previo con cualquier agencia federal estatal, local o privada que pudiera impedirle al delegado oficial de la Oficina de Reubicación de Refugiados obtener la información solicitada.

Las copias de esta autorización que contengan mi firma son tan válidas como el original. Esta autorización es válida por un (1) año a partir de la fecha de su firma.

Firma (firme con tinta) 		Nombre completo (a máquina o en letra de imprenta legible) Francisco de Jesus Serrano		Fecha de la firma 05/10/18
Otros nombres que usted haya usado (alias)		Fecha de nac. del patrocinador [redacted] / 1974		Número del Seguro Social (opcional) [redacted]
Domicilio actual [redacted] Washington		Estado D.C.	Código postal [redacted]	Nro. de teléfono de su hogar (incluya el código de área) [redacted]

No es obligatorio indicar su número de Seguro Social. Sin embargo, si no lo indica, es posible que la ORR no pueda realizar la investigación de antecedentes necesaria para el procedimiento de reunificación.

# **EXHIBIT 3**

# UNIFORM STATUTORY FORM POWER OF ATTORNEY

(California Probate Code Section 401)

Notice: The powers granted by this document are broad and sweeping. They are explained in the Uniform Statutory Form Power of Attorney Act (California Probate Code Sections 4400-4465). If you have any questions about those powers, obtain competent legal advice. This document does not authorize anyone to make medical or other health care decisions for you. You may revoke this power of attorney if you later wish to do so.

SANTA MONICA

MARCELO DE LA FUENTE

SAN DIEGO, CALIFORNIA 92134

(Your name and address)

AGENTE FINANCIERO DE JESUS SERAÑO BARRON

WASHINGTON DC

(Name and address of the person appointed or of each person appointed if you want to designate more than one)

- By this power of attorney, I do hereby authorize in any lawful way with respect to the following initialed subjects:
- To grant all of the following powers, initial the line in front of (H) and ignore the lines in front of the other powers,
  - To grant one or more, but fewer than all, of the following powers, initial the line in front of each power you are granting,
  - To withhold a power, do not initial the line in front of it. You may but need not cross out each power withheld.

## INITIAL INITIAL

(A) Real property transactions.

(B) Tangible personal property transactions.

(C) Motor and boat transactions.

(D) Voluntary and optional transactions.

(E) Banking and other financial institution transactions.

(F) Insurance transactions.

(G) Powers from and other beneficiary transactions.

(H) Claims and litigation.

(I) Personal and family maintenance.

(J) Benefits from social security, Medicare, Medicaid, or other governmental programs, or civil or military service.

(K) Retirement plan transactions.

(L) Tax matters.

(M) ALL OF THE POWERS LISTED ABOVE.

You need not initial any other lines if you initial line(N)

## SPECIAL INSTRUCTIONS:

(If the following lines you may give special instructions limiting or extending the powers granted to your agent)

Authorized to carry on (medical, dental, school, financial or any act necessary) for my children:

[Redacted]

(D.O.B. [Redacted] 2010)

[Redacted]

(D.O.B. [Redacted] 2015)

This power of attorney shall be effective immediately and will continue until Revoked

This power of attorney will continue to be effective even though I become incapacitated.

(Strike the preceding sentence if you do not want this power of attorney to continue if you become incapacitated)

## EVERY ONE OF POWER OF ATTORNEY WHERE MORE THAN ONE AGENT DESIGNATED

If I have designated more than one agent, the agents are to act \_\_\_\_\_

If you sign this document, you are giving your name and you want each agent to be able to act alone without the other agent's signature. Write the word "jointly" in the blank space above. If you do not insert any word in the blank space or if you insert the word "jointly", then all of your agents must act or sign together.

I agree that any third party who receives a copy of this document may act under it. Revocation of the power of attorney is not effective as to a third party until the third party has actual knowledge of the revocation. I agree to indemnify the third party for any claims that arise against the third party because of reliance on this power of attorney.

Signed this 11th day of May, 2018

[Signature]  
(Your signature)

[Redacted]  
(Your social security number)

State of California County of San Diego

BY ACCEPTING OR ACTING UNDER THE APPOINTMENT, THE AGENT ASSUMES THE FIDUCIARY AND OTHER LEGAL RESPONSIBILITIES OF AN AGENT.

CERTIFICATE OF ACKNOWLEDGEMENT OF NOTARY PUBLIC

STATE OF CALIFORNIA  
COUNTY OF SAN DIEGO

On this 11th day of May, 2018 before me, K. V. FAY

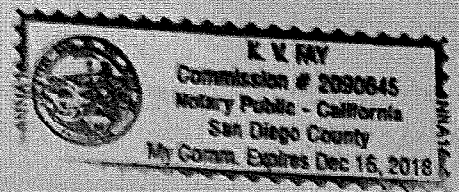
Notary Public personally appeared: MARIA SERRANO

Personally known to me (or proved to me on the basis of satisfactory evidence) to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

K. V. FAY  
(SIGNATURE OF NOTARY)



(Seal)



# **EXHIBIT 4**



STATE OF WASHINGTON  
 DEPARTMENT OF SOCIAL AND HEALTH SERVICES  
 CHILDREN'S ADMINISTRATION  
 PO Box 45710  
 Olympia WA 98504-5710

**Washington State Child Abuse and Neglect  
 Founded Findings Request from Another State**

The information provided through this service is limited to the existence of founded findings (substantiated findings) of allegations of child abuse and neglect, and complies with the Adult Welfare Child Protection and Safety Act of 1991 for purposes of supporting a prospective adoptive or foster parent. Follow the steps below.

This form must be typewritten and signed. Any handwritten or incomplete forms will be returned for correction.

1. Complete one form for each individual for whom a child abuse/neglect findings request is being requested.
2. Include a check or money order in the amount of \$20.00, per individual inquiry, made payable to DSHS Children's Admin.
3. Mail completed requests to: DSHS Children's Administration ATTN: Fiscal  
 PO Box 45710  
 Olympia WA 98504-5710
4. See "instructions" for ICPC requests. Call 1-800-562-5624 or email: [adoption@dcyf.wa.gov](mailto:adoption@dcyf.wa.gov) with any questions.

**A. Requestor Information**

NAME, LAST <b>Ramos</b>	FIRST <b>Cynthia</b>	TITLE <b>Supervisor</b>	WASHINGTON STATE CASE NUMBER (ICPC 1001)
AGENCY OR BUSINESS NAME <b>Health and Human Services</b>		CITY <b>Hockville</b>	STATE ZIP CODE <b>WA 98027</b>
MAILING ADDRESS <b>5600 Fishers Lane Parklawn Rd #02E70</b>		TELEPHONE NUMBER (WITH AREA CODE) <b>301-443-7047</b>	FAX NUMBER (WITH AREA CODE) <b>301-480-0292</b>
TELEPHONE NUMBER (WITH AREA CODE)		E MAIL ADDRESS <b>cramos@dcyf.wa.gov</b>	

**B. Signature of Requestor**

REQUESTED BY (SIGNATURE)	DATE SIGNED
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**C. Subject of Records Requested**

NAME, LAST <b>Serrano</b>	FIRST <b>Francisco</b>	MIDDLE <b>de Jesus</b>	DATE OF BIRTH [REDACTED]
PREVIOUS NAMES USED (AKA, ALIASES OR MAIDEN) <b>[REDACTED]</b>			SEX <b>MALE</b>
LAST WASHINGTON STATE MAILING STREET ADDRESS <b>[REDACTED]</b>		CITY <b>Washington</b>	STATE ZIP CODE <b>DC 20004</b>

**D. Authorization BY Subject of Records Requested**

By signing below, I authorize the State of Washington Department of Social and Health Services to release (unredacted information) about me regarding any founded findings of child abuse or neglect to the requesting individual or agency identified above.

SIGNATURE <i>[Signature]</i>	DATE SIGNED <b>06/19/18</b>
---------------------------------	--------------------------------

**Response by the Washington State Dept's Children's Administration**

The result of a search of the Children's Administration child welfare records, pursuant to the data provided above is as follows:

Our records do not indicate that the person identified in your inquiry request has been named as a subject in a founded finding of abuse or neglect.

Our records indicate that one or more founded findings exist in which the person identified in your inquiry request was the subject.

CHECK NUMBER
FISCAL INITIALS
DATE COMPLETED
STATE INITIALS

# **EXHIBIT 5**



## Administración para los niños y la familia Oficina de Reubicación de Refugiados

# Solicitud de reunificación familiar

## Cómo completar esta solicitud

**IMPORTANTE:** Si no puede completar estos pasos en el lapso de siete (7) días, infórmese al Administrador de su caso.

### Paso 1

Si todavía no lo ha hecho, debe firmar y devolver de inmediato al Administrador de su caso el formulario de **Autorización de divulgación de información** y una copia de su identificación (ID) con foto emitida por el gobierno.

Si se le pide que presente huellas dactilares, el Administrador de su caso lo ayudará a programar una cita para presentar sus huellas dactilares en el lapso de tres (3) días. Comuníquese con el Administrador de su caso si tiene preguntas.

### Paso 2

Lea el **Manual del patrocinador** y el **Acuerdo del patrocinador sobre el cuidado** que incluye otra información importante que debe saber acerca de patrocinar a un menor en nuestro programa.

### Paso 3

Complete y firme la **Solicitud de reunificación familiar** (páginas 3 a 7 de este paquete).

### Paso 4

Reúna los documentos necesarios que se enumeran en la sección **Documentos probatorios** (páginas 8 a 10 de este paquete).

### Paso 5

Presente la **Solicitud de reunificación familiar** (esta solicitud) y los documentos probatorios necesarios al Administrador de su caso.

# Solicitud de reunificación familiar

## Oficina de Reubicación de Refugiados

### Preguntas frecuentes

#### ¿Puedo patrocinar a mi hijo si no tengo documentos?

Sí. La Oficina de Reubicación de Refugiados (ORR, Office of Refugee Resettlement)/División de Servicios de Niños No-Acompañados (Division of Unaccompanied Children's Services, DUCS) prefiere entregar un niño a su madre, padre o tutor legal sin importar la situación migratoria.

#### ¿Tiene un costo patrocinar a un niño?

No. No se exigen cargos para completar los requisitos para patrocinar a un niño. Sin embargo, usted puede ser responsable de los costos de viaje y como acompañante del niño.

#### ¿Necesito un abogado para patrocinar a un niño?

No. No necesita un abogado para completar los requisitos para patrocinar a un niño. Si necesita ayuda para completar los requisitos, el Administrador de su caso lo puede ayudar. Si busca atención adicional, tenga en cuenta que no hay ningún cargo por completar los requisitos para patrocinar a un niño.

#### ¿Por qué tengo que presentar mis huellas dactilares?

ORR/DUCS requiere investigaciones de antecedentes para garantizar la seguridad del niño. Si se le pide que presente huellas dactilares, el Administrador de su caso lo ayudará a programar una cita para presentar sus huellas dactilares en el lapso de tres (3) días. Comuníquese con el Administrador de su caso si tiene preguntas.

#### ¿Qué información debo proporcionar?

Debe completar la Solicitud de reunificación familiar y los documentos probatorios. También debe responder preguntas del Administrador de su caso sobre su hogar, la relación con el niño y su capacidad de cuidar el bienestar físico y mental del niño. Debe proporcionar prueba de su identidad.

#### ¿Cuándo tengo que entregarle estos documentos al Administrador de mi caso?

Debe presentar toda la información necesaria en el lapso de siete (7) días o antes, si es posible. Cuanto antes presente todos los documentos necesarios, con más rapidez ORR tomará una decisión sobre la liberación del niño para su custodia. ORR le informará de inmediato la decisión sobre la liberación del niño para su custodia o le notificará si se necesita una evaluación o información adicional.

¿Necesita ayuda? Comuníquese con el  
Administrador de su caso.

ORR UAC/FRP-3s [Rev. 05/14/2018]  
OMB 0970-0278 [válida hasta el 10/31/2018]

La LEY DE SIMPLIFICACIÓN DE TRÁMITES DE 1995 (Pub. L. 104-13). Se estima que el promedio de las declaraciones públicas obligatorias de esta solicitud de información es de 30 minutos por respuesta, incluido el tiempo para revisar las instrucciones, recolectar y mantener los datos necesarios y revisar la solicitud de información. Una agencia no puede dirigir ni patrocinar y no es necesario que una persona responda a una recopilación de información, a menos que muestre un número de control válido y actual de la Oficina de Administración y Presupuesto (Office of Management and Budget, OMB) Consulte el aviso de privacidad adjunto/Declaración de la Ley de Privacidad para obtener un análisis acerca de (1) la autoridad de la solicitud de información y acerca de si la divulgación es obligatoria o voluntaria, (2) los propósitos principales para los cuales la información está dirigida, (3) otros usos autorizados para los cuales se puede usar la información y (4) los efectos, si los hay, de no brindar toda o parte de la información solicitada

Página 2 de 10

# Solicitud de reunificación familiar

## Oficina de Reubicación de Refugiados

### Acerca de usted, el patrocinador y el (los) menor(es)

**1) Nombre(s) del (de los) menor(es)**

Enumere los nombres de todos los niños que solicita patrocinar


**2) Su relación con el (los) menor(es)**

p. ej. madre, tío, amigo de la familia


**3) Su nombre**

--

**4) Cualquier otro nombre que usted haya utilizado**

Enumere otros nombres que haya usado, como su nombre antes de casarse o sus apellidos maternos (sepárelos con comas)

--

**5) Su país de origen (de usted)**

Dónde nació

--

**6) Su fecha de nacimiento (de usted)**

p. ej., 12/31/1979

--

**7) Números de teléfono**

p. ej., 210-555-1234

Teléfono principal

--

Teléfono secundario

--

**8) Su dirección de correo electrónico o número de fax**

--

**9) Idioma(s) que habla**

--

¿Necesita ayuda? Comuníquese con el Administrador de su caso.

## Solicitud de reunificación familiar

### Oficina de Reubicación de Refugiados

### ¿Dónde vivirán usted y el (los) menor(es)?

**10) Domicilio**

Domicilio  
(+ número de departamento, si  
corresponde)

Ciudad

Estado

Código postal

**11) ¿Quién vive actualmente en este domicilio?**

Nombre del miembro del hogar	Fecha de nacimiento	Relación con usted (el patrocinador)	Relación con el menor
<i>(EJEMPLO) Miguel Perez</i>	<i>12/31/1985</i>	<i>Hermano</i>	<i>Tío</i>

¿Necesita ayuda? Comuníquese con el Administrador de su caso.

## Solicitud de reunificación familiar Oficina de Reubicación de Refugiados

### Adulto que se hará cargo del (de los) menor(es) si usted no puede hacerlo

En el caso de que tenga que irse de los Estados Unidos o no pueda hacerse cargo del (de los) menor(es), ¿quién se hará cargo del (de los) menor(es)?

12a) Nombre del posible encargado adulto

12b) Fecha de nacimiento del posible encargado adulto

12c) Información de contacto del posible encargado adulto

Número de teléfono

Domicilio  
(+ número de departamento, si corresponde)

Ciudad

Estado

Código postal

12d) ¿Cuál es su relación con el (los) menor(es)?  
(abuelo, tía, hermano mayor de 18 años, etc.)

12e) ¿Cuál es su relación con usted, el patrocinador?

12f) ¿Cómo se cuidará al (a los) menor(es) en el caso de que usted se tenga que ir de los Estados Unidos o no pueda cuidarlo(s)?

¿Necesita ayuda? Comuníquese con el  
Administrador de su caso.

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Página 5 de 10



# Solicitud de reunificación familiar

## Oficina de Reubicación de Refugiados

### Información económica

#### 13) ¿Cómo mantendrá económicamente al (a los) menor(es)?

Incluya todas las fuentes y los montos de su ingreso (por ejemplo, cuánto le pagan por semana) y explique cualquier apoyo económico que reciba de otros que lo ayudarán a mantener económicamente al (a los) menor(es).

### Información médica

#### 14a) ¿Alguno de los ocupantes de su hogar sufre de alguna enfermedad grave y contagiosa (tuberculosis [TB], síndrome de inmunodeficiencia adquirida [SIDA], hepatitis, etc.)? Si así fuera, explíquelo:

#### 14b) ¿Sabe de alguna afección médica que el (los) menor(es) pueda(n) tener (discapacidades, alergias, enfermedades, etc.)? Si así fuera, explíquelo:

¿Necesita ayuda? Comuníquese con el Administrador de su caso.

ORR UAC/FRP-3s [Rev. 05/14/2018]  
OMB 0970-0278 [válida hasta el 10/31/2018]

Página 6 de 10

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## Solicitud de reunificación familiar Oficina de Reubicación de Refugiados

### Antecedentes penales

Si responde "Sí" a cualquiera de estas preguntas, tendrá que brindar más información. Consulte la página de Documentos probatorios (página 9 de este paquete) para obtener más información.

**15a) ¿Usted o alguno de los ocupantes de su hogar han sido acusados o condenados por un delito alguna vez (que no sea una infracción menor de tránsito, p. ej., velocidad excesiva, multa por mal estacionamiento, etc.)?**

Sí  No

**15b) ¿Usted o alguna persona en su hogar han sido investigados por abuso físico, sexual, descuido o abandono de un menor alguna vez?**

Sí  No

### Firma y fecha de la solicitud

Declaro y afirmo bajo pena de perjurio que la información contenida en esta solicitud es verdadera y precisa, según mi leal saber y entender.

Doy fe de que todos los documentos que presento o las copias de dichos documentos están libres de error y de fraude.

Doy fe además que me atenderé a las instrucciones contenidas en el *Acuerdo del Patrocinador sobre el Cuidado*.

Velaré por el bienestar físico y mental del (de los) menor(es). También cumpliré con las leyes de mi estado respecto del cuidado de este menor, lo que incluye:

- la inscripción de (de los) menor(es) en la escuela;
- la provisión de atención médica cuando sea necesaria;
- la protección del (de los) menor(es) contra el abuso, descuido y abandono;
- y cualquier otro requisito no contenido en el presente.

SU FIRMA

FECHA

¿Necesita ayuda? Comuníquese con el  
Administrador de su caso.

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Página 7 de 10

# Solicitud de reunificación familiar

## Oficina de Reubicación de Refugiados

### Documentos probatorios

Sírvase proveer una copia de los siguientes documentos que figuran a continuación. Si no puede proporcionar los documentos que solicitamos, explique el motivo. Tenga en cuenta que podemos rechazar su solicitud si falta cualquier elemento de la información solicitada, si esta se encuentra incompleta o no es correcta.

#### 1) Prueba de identidad de usted y de los miembros del hogar

Una copia de una identificación emitida por el gobierno. Puede presentar una opción de la Lista A o dos o más opciones de la Lista B. Si presenta opciones de la Lista B, al menos una opción debe contar con una fotografía. Se aceptan documentos vencidos.

Lista A
Pasaporte de los EE. UU o tarjeta pasaporte de los EE. UU.
Pasaporte extranjero que contenga una fotografía
Tarjeta de residente permanente o tarjeta de registro de extranjero (Formulario I-551)
Documento de Autorización de Empleo que contenga una fotografía (Formulario I-766)
Licencia de conducir o tarjeta de identificación de los EE. UU.

Lista B
Certificado de naturalización de los EE. UU.
Tarjeta de identificación militar de los EE. UU.
Partida de nacimiento
Certificado de matrimonio
Orden judicial para el cambio de nombre
Tarjeta de identificación de extranjero
Recibo de renovación del pasaporte del consulado que contenga una fotografía
Tarjeta de identificación del consulado de México
Licencia de conducir extranjera que contenga una fotografía
Tarjeta del registro de votantes extranjeros que contenga una fotografía
Tarjeta de cruce fronterizo de Canadá que contenga una fotografía
Tarjeta de cruce fronterizo de México que contenga una fotografía con el formulario I-94 válido
Documento de viaje del refugiado que contenga una fotografía
Otros documentos del gobierno similares

¿Necesita ayuda? Comuníquese con el Administrador de su caso.

Página 8 de 10

ORR UAC/FRP-3s [Rev. 05/14/2018]

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## Solicitud de reunificación familiar

### Oficina de Reubicación de Refugiados

#### 2) Prueba de la identidad del menor

Una copia del certificado de nacimiento del menor

#### 3) Prueba del parentesco

Copias de los documentos para brindar pruebas de una relación entre usted y el menor. Se aceptan documentos vencidos.

Su relación con el menor	Documentos aceptables
Padre/madre	<ul style="list-style-type: none"> <li>● Partidas de nacimiento</li> <li>● Registros judiciales</li> <li>● Identificación con fotografía del padre/madre emitida por el gobierno</li> </ul>
Padrastro/madrastra Adoptó legalmente al menor	<ul style="list-style-type: none"> <li>● Partidas de nacimiento</li> <li>● Identificación con fotografía del padre/madre emitida por el gobierno</li> <li>● Identificación con fotografía del padrastro/madrastra emitida por el gobierno</li> <li>● Certificado de matrimonio</li> <li>● Documentos de una orden judicial que confirman que se estableció la adopción o la tutoría legal</li> </ul>
Tutor legal	<ul style="list-style-type: none"> <li>● Documentos de una orden judicial que confirman que se estableció la adopción o la tutoría legal</li> <li>● Partidas de nacimiento</li> <li>● Identificación con fotografía del tutor legal emitida por el gobierno</li> <li>● Registros de la tutoría</li> <li>● Certificados de defunción</li> <li>● Registros hospitalarios</li> </ul>
Miembro de la familia	<ul style="list-style-type: none"> <li>● Partidas de nacimiento</li> <li>● Rastro de certificados de defunción y/o partidas de nacimiento de los familiares que muestren que usted y el menor tienen un parentesco</li> <li>● Certificados de matrimonio</li> <li>● Registros hospitalarios</li> <li>● Registros judiciales</li> <li>● Registros de la tutoría</li> <li>● Certificado de bautismo</li> </ul>
No tiene parentesco con el menor	Comuníquese con el Administrador de su caso

¿Necesita ayuda? Comuníquese con el Administrador de su caso.

Página 9 de 10

ORR UAC/FRP-3s [Rev. 05/14/2018]

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#### 4) Registros legales (si corresponde)

Si usted respondió "Sí" a cualquiera de las preguntas 15(a) o 15(b) de este formulario, proporcione la siguiente información para cada cargo/condena:

- Nombre de la persona implicada
- Lugar y fecha del incidente
- Explicación del incidente
- Pronunciamiento del incidente (p. ej., retiro de cargos, aplicación de multa, detención, libertad condicional)
- Copia del (de los) registro(s) judicial(es), registro(s) policial(es), y/o registro(s) de la agencia de servicio social gubernamental relacionado(s) con el (los) incidente(s)

#### 5) Evidencia del domicilio

Una copia de al menos un tipo de documentación que verifique su domicilio actual. Los tipos de documentación aceptables incluyen los siguientes:

- Su renta actual con su nombre, y con fecha en los últimos dos meses
- Su estado de cuenta actual con su nombre, y con fecha en los últimos dos meses
- Su estado de cuenta bancario, con fecha en los últimos dos meses
- Su empleador emite un recibo de sueldo oficial, con fecha en los últimos dos meses
- Su ID del estado válida y vigente con su fotografía y domicilio actual
- Correspondencia, en lo posible una factura de servicio público o liquidación de seguros, dirigida a usted a su domicilio actual, con fecha en los últimos dos meses
- Carta de su locador, certificada por notario público, en la que se confirme su domicilio y que contenga su nombre, la fecha en la cual se mudó, la cantidad de dormitorios y la fecha de vencimiento de la renta
- Otros documentos similares que indiquen, de manera confiable, que vive en su domicilio actual, con fecha en los últimos dos meses

¿Necesita ayuda? Comuníquese con el  
Administrador de su caso.

Página 10 de 10

ORR UAC/FRP-3e [Rev. 05/14/2018]

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## Sponsor Care Agreement

Office of Refugee Resettlement

Le solicitó a la Oficina de Reubicación de Refugiados (Office of Refugee Resettlement, ORR) patrocinar a un niño extranjero no acompañado en el cuidado y la custodia del gobierno federal conforme al acuerdo extrajudicial estipulado Flores v. Reno, número 85-4544-RJK (Px) (C.D. Cal., 17 de enero de 1997), sección 462 del Homeland Security Act de 2002 y la sección 235 del William Wilberforce Trafficking Victims Protection Reauthorization Act de 2008. Si se aprueba la solicitud de patrocinio, recibirá un formulario de *Verificación de liberación* de ORR y se celebrará un acuerdo de custodia con el gobierno federal en el cual acepta cumplir con las siguientes disposiciones mientras el menor esté en su cuidado:

- Proporcionar el bienestar mental y físico del menor, que incluye, entre otros, alimentos, refugio, vestimenta, educación, atención médica y otros servicios según sea necesario.
- Si no es el tutor legal ni el padre o la madre del menor, haga los mejores esfuerzos por establecer una custodia legal con el tribunal local dentro de un tiempo razonable.
- Asistir a un programa de orientación legal proporcionado por el Departamento de Justicia (Department of Justice, DOJ), o programa de orientación legal para custodios (patrocinadores) de la Oficina Ejecutiva para la Revisión de la Inmigración (Executive Office for Immigration Review, EOIR), si está disponible en el lugar donde reside.
- Según dónde esté pendiente el caso de inmigración del menor, notificar al Tribunal de Inmigración o al Tribunal de Apelaciones de Inmigración local en un período de cinco (5) días de todo cambio de dirección o número de teléfono del menor, usando el formulario de cambio de dirección de extranjeros (formulario EOIR-33). Además, si es necesario, presentar una petición de cambio de competencia territorial a nombre del menor. La petición de cambio de competencia territorial debe contener información especificada por el Tribunal de Inmigración. Tenga en cuenta que la petición de cambio de competencia territorial puede requerir la ayuda de un abogado. Para obtener asesoramiento sobre la "petición de cambio de competencia territorial", consulte el Manual de práctica del Tribunal de Inmigración en [http://www.justice.gov/eoir/vi/OCLIPracManual/ocij\\_page1.htm](http://www.justice.gov/eoir/vi/OCLIPracManual/ocij_page1.htm). Para obtener información sobre casos de inmigración, comuníquese con el sistema de información de casos de inmigración de EOIR llamando al 1-800-898-7180. Visite el sitio web de EOIR para obtener información adicional en: <http://www.justice.gov/eoir/formlist.htm>.
- Notificar al Departamento de Seguridad del Territorio Nacional (Department of Homeland Security, DHS) o a Servicios de Ciudadanía e Inmigración de los Estados Unidos (U.S. Citizenship and Immigration Services) en un período de diez (10) días de todo cambio de dirección, presentando la Tarjeta de Cambio de Dirección de Extranjero (AR-11) o de manera electrónica en <http://i.usa.gov/Ac5MP>.
- Asegurar la presencia del menor en todos los procedimientos futuros ante DHS o Inmigración y Seguridad de Aduanas (Immigration and Customs Enforcement, ICE) y el Departamento de Justicia (Department of Justice, DOJ) o EOIR. Para obtener información

sobre casos de inmigración, comuníquese con el sistema de información de casos de EOIR llamando al: 1-800-898-7180.

- Asegurar que el menor se presente ante ICE para la expulsión de los Estados Unidos si un juez de inmigración emite una orden de expulsión o una orden de salida voluntaria. Se asigna al menor un oficial de deportación para los procedimientos de expulsión.
- Notificar a la autoridad policial local o a los Servicios de Protección Infantil local o estatal si el menor estuvo o está en riesgo de estar sujeto a abuso, abandono, descuido o maltrato o si se entera de que el menor ha sido amenazado, abusado o agredido sexual o físicamente, o ha desaparecido. Se debe notificar ni bien sea posible o antes de las 24 horas después de ocurrido el acontecimiento, o después de tener conocimiento del riesgo o la amenaza.
- Notificar al Centro Nacional para Niños Perdidos y Explotados (National Center for Missing and Exploited Children) al 1-800-843-5678 si el menor desaparece, fue secuestrado o se escapa. Se debe notificar ni bien sea posible o antes de las 24 horas después de enterarse de la desaparición del menor.
- Notificar a ICE si algún individuo que se crea que represente un sindicato de contrabando de extranjeros, crimen organizado o una organización de tráfico de seres humanos se comunica de alguna forma con el menor. Notificar lo antes posible o antes de las 24 horas después de conocer esta información. Puede llamar a ICE al 1-866-347-2423.

*términos de este Acuerdo de cuidado del patrocinador.*

- Si no es el tutor legal ni el padre o madre del niño, en caso de que ya no pueda y no esté dispuesto a cuidar al menor y no pueda transferir de manera temporal la custodia física y el menor reúna los requisitos de la definición de niño extranjero no acompañado, debe notificar a ORR al 1-800-203-7001.
- La liberación del menor mencionado anteriormente de la Oficina de Reubicación de Refugiados para su cuidado no le otorga al menor ningún estado de inmigración legal y el menor debe presentarse a los procedimientos del tribunal de Inmigración.



## **Declaración del patrocinador**

### **Oficina de Reubicación de Refugiados**

Declaro y afirmo, bajo pena de perjurio, que soy el patrocinador propuesto para el menor y que mi *Solicitud de reunificación familiar* y los documentos usados como respaldo a la solicitud funcionan como evidencia de que tengo la plena intención de proporcionarle cuidado al menor que pretendo patrocinar. Asimismo, no me presento como patrocinador para no tener a un menor a mi cuidado y luego transferir ese menor a otra persona, en incumplimiento de la política de la Oficina de Reubicación de Refugiados (Office of Refugee Resettlement, ORR) y las leyes federales.

Solo puedo transferir a un menor al cuidado de otra persona en las siguientes situaciones:

- (1) a los padres biológicos del menor, en caso de que al hacerlo no exponga al niño a un peligro inmediato y que no haya una finalización de los derechos parentales;
- (2) en el caso de que no pueda o no desee continuar el patrocinio debido a una dificultad inesperada o en el caso de que deje inminentemente los Estados Unidos, transferiré el cuidado del menor a un cuidador alternativo (y únicamente al cuidador alternativo) identificado en mi respuesta a las Preguntas 12a-e de mi *Solicitud de reunificación familiar*, conforme a lo aprobado por la ORR en mi *Plan de cuidado del patrocinador*, si al hacerlo no expongo al menor a un peligro inmediato;
- (3) a funcionarios encargados del cumplimiento de las leyes locales, estatales o federales o funcionarios del Servicio de Protección de Menores (Child Protective Service, CPS), o a las personas designadas del gobierno local o estatal.

Antes de intentar transferir a un menor, debo notificar al Centro de Atención Telefónica Nacional (National Call Center, NCC) de la ORR al 1-800-203-7001. La Oficina de Reubicación de Refugiados puede requerir más información antes de que pueda realizar una transferencia de cuidado o puede requerir una medida correctiva antes de aprobar una transferencia.

Si no notifico a la Oficina de Reubicación de Refugiados sobre una transferencia o si transfiero al menor a una persona no autorizada, entiendo que el gobierno federal puede procesarme por perjurio, fraude, trata de personas u otros delitos penales establecidos en la ley federal, según corresponda.

Comprendo que la conspiración o la cooperación en la comisión de cualquiera de los siguientes actos constituye un delito:

- (1) ingresar o intentar ingresar a un extranjero a los Estados Unidos por un lugar que no sea el puerto de entrada designado u otro lugar designado por el Departamento de Seguridad Nacional (Department of Homeland Security, DHS);
- (2) transportar o mover, o intentar transportar y mover, a un extranjero que no tiene una condición legal dentro de los Estados Unidos para apoyar una violación de la ley;
- (3) alojar u ocultar, o intentar alojar y ocultar, a un extranjero que no tiene una condición legal dentro de los Estados Unidos; o



(4) incentivar o inducir a un extranjero para que venga a los Estados Unidos si su residencia es o será una violación a la ley.

Además, puedo estar sujeto a tener que asumir una responsabilidad civil derivada de una transferencia del cuidado de un menor a una persona no autorizada de forma negligente o imprudente. La Oficina de Reubicación de Refugiados coopera plenamente con las autoridades encargadas del cumplimiento de las leyes locales, estatales y federales, incluidas las autoridades de inmigración federales o las autoridades de bienestar de menores, para poner en práctica fielmente las leyes que involucran la divulgación de mi información personal en el caso de que un menor sea transferido de una manera no autorizada.

Además, entiendo que, si no soy un ciudadano estadounidense, una transferencia no autorizada de un menor puede afectar mi capacidad de permanecer en los Estados Unidos, independientemente de mi condición legal de inmigración.

Afirmo o certifico que entiendo la advertencia proporcionada en esta declaración.

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**Nombre del patrocinador**

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**Fecha**

## Please wait...

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# **EXHIBIT 6**

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
Child and Family Services Agency



**Request for a Child Protection Register (CPR) Check**

The purpose of the Child Protection Register is to protect children and to ensure their safety by maintaining an index of perpetrators of child abuse and neglect in the District of Columbia. This confidential index includes the names of individuals with substantiated and/or inconclusive findings from the investigative reports of the Child Protective Services Unit of the Child and Family Services Agency. Authorized individuals may request background checks to establish whether an individual has a record of substantiated abuse or neglect of a child that occurred in the District of Columbia.

- ▶ To request a local police clearance for the District of Columbia, please visit <https://mpdc.dc.gov/node/187552>.
- ▶ For information about the Sex Offender Registry, visit: <https://mpdc.dc.gov/service/sex-offender-registry>.
- ▶ If you are making a request on behalf of a state child welfare agency outside of the District of Columbia and need the history of a family previously living in the District of Columbia, you may call 202-671-SAFE.
- ▶ For other questions, call the CPR Unit at 202-727-8885 between 8:30 am and 4:30 pm Monday through Friday.

**Read all instructions – incomplete, incorrect or illegible forms will be returned and your request may be delayed**

- Do not complete an old version of the form; get the latest form at <https://cfsa.dc.gov/service/background-checks>.
- Mail or deliver original application (no photocopies); no faxed, emailed, or scanned applications accepted.

**Part I**

- Schools (other than DCPS), child care facilities, private foster care agencies, and other private, community-based organizations should select “Non-Government Organization” as the Requestor Type.
- CPR check results are not transferrable and cannot be shared from one agency or employer to another.

**Part II**

- If you have no middle name write “no middle name” or if a middle name is an initial, indicate “initial only.”
- If the answer to any question is none, write “N/A”.

**Part III**

- An individual must sign the form to provide consent for CFSA to release information to an authorized requestor.
- The form must be signed in blue ink; electronic signatures are not permitted.
- An employment request allows access to substantiated reports of child maltreatment, to chief executive officers or directors of day care centers, schools, or any public or private organization working directly with children, for the purpose of making employment decisions.

**Part IV**

- Forms shall be returned if not notarized (*Note: applications for prospective and current CFSA resource parents and kin caregivers need not be notarized, but photo ID must be provided and the form must be signed in the presence of a CFSA employee*).

**Part V**

- Self-check applications must be submitted in person, not by mail.
- Individuals requesting a self-check and CFSA resource parents and kin caregivers must present **one** non-expired, government-issued, photo identification: e.g., driver’s license, state identification card, passport, “green card”.
- Results of CPR self-checks may not be used for employment purposes. Employers must directly request CPR clearances for prospective or current employees.

<p><b>MAIL or HAND DELIVER completed forms to:</b></p>	<p>Attn: Child Protection Register Unit Child and Family Services Agency 200 I Street SE, 3rd Floor Washington, DC 20003</p>	<p><b>Applications accepted between 8:30 am and 4:30 pm Monday through Friday</b></p>
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Please **type** or **print** clearly. Sign the form in **blue** ink, and date where indicated. Thoroughly review and submit to the CFSA CPR office. **Allow up to 30 business days** for results to be processed. Expedited requests will be considered on a case-by-case basis. **Forms will be returned** if incomplete, incorrect, or illegible resulting in a delayed response.

**PART I: Requesting Organization/Employer Information**

Request Date		Corrected Application Re-submission Date	
<b>Requestor Type</b>			
<input type="checkbox"/> Court	<input type="checkbox"/> Government Agency	<input type="checkbox"/> Non-Government Organization	<input type="checkbox"/> Self ( <i>personal use only</i> )
<b>Purpose</b>			
<input type="checkbox"/> Adoption	<input type="checkbox"/> Court Request	<input type="checkbox"/> Foster/Adoption Licensing	<input type="checkbox"/> Kinship Licensing
<input type="checkbox"/> Visitation	<input type="checkbox"/> Current Employee/Volunteer	<input type="checkbox"/> New Hire/Volunteer	<input type="checkbox"/> Other:
<b>Requesting Organization/Employer Contact Information</b> (results cannot be mailed to a P.O. Box)			
Requesting Organization	U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES, PROGRAM SUPPORT CENTER, DIVISION OF CHILDREN'S SERVICES		
Attention To	Cynthia Ramos		
Requestor Address	5600 FISHERS LANE, ROOM 02E70, ROCKVILLE, MD 20857		
Phone Number	(301) 443-7047	Fax Number	(301) 480-0292
Preferred method to return CPR check results to the requesting organization		<input type="checkbox"/> By Mail	<input checked="" type="checkbox"/> By Fax

**PART II: Applicant Information**

Last Name (include suffix if applicable)	First Name	Full Middle Name (write "no middle name" if there is none)	
Date of Birth (MM/DD/YYYY)	Social Security Number (or USCIS/Alien Registration #)	Gender (on birth certificate)	
		<input type="checkbox"/> Male	<input type="checkbox"/> Female
Other Names Used (nicknames, alias, maiden name, previous married name, legal name change, etc.)			

**Household Information.** List all persons living at the current address with the applicant (including students away at college).

Name (first name, middle name, last name)	Date of Birth	Relationship to Applicant

**Previous Residency Information.** List all addresses (excluding zip code) and the start and end dates, to the best of your ability. Indicate L, W or M in the first column (L = lived, W = worked, M = received mail).

- Applicants for employment or volunteer purposes must include all addresses of residence and where mail was received for the last five (5) years.
- Applicants for adoption, foster care, and kinship care must provide addresses for residency, receipt of mail and employment from the age of 18, per Title 29 DCMR Chapter 60 § 6009.1.
- To calculate the starting date for the previous addresses, add 18 years to the date of birth (e.g., If you were born in 1970, add 18 so addresses going back to 1988 must be provided).
- To help obtain previous addresses, check the credit report bureaus (Equifax, Experian, TransUnion).

Current Address (include Street #, Apt #, Quadrant if applicable)		City		State	Zip
L W M	Previous Address (Include Street # and Apt #)	City	State	Start – End Dates (MM/YYYY – MM/YYYY)	

**PART III: Applicant Consent**

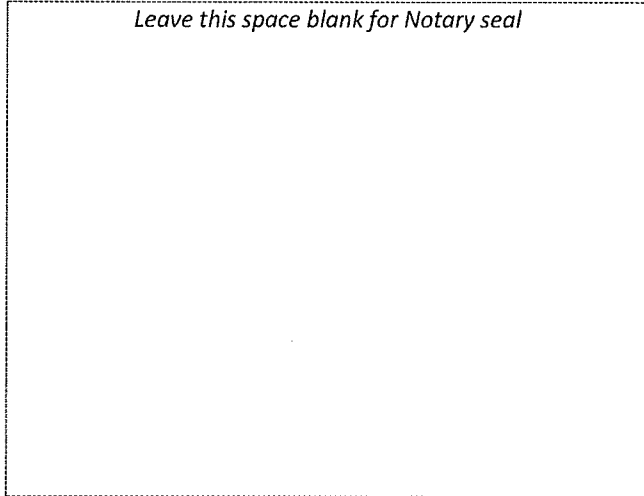
I hereby consent and authorize the D.C. Child and Family Services Agency to provide the Requestor (noted in Part I) information concerning me that is contained in the Child Protection Register ("CPR").

Printed Name: \_\_\_\_\_

Signature: \_\_\_\_\_  
*Must be signed in blue ink; electronic signatures not permitted*

Date: \_\_\_\_\_

**PART IV: Certificate of Acknowledgement of the Applicant before a Notary Public**



\_\_\_\_\_  
 Applicant Name  
 (Printed)

\_\_\_\_\_  
 Applicant Signature  
 (must be signed in the presence of a Notary)

\_\_\_\_\_  
 Date

Subscribed and affirmed or sworn to me, in my presence, on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

Signature of Notary Public: \_\_\_\_\_ in the state of, \_\_\_\_\_

My commission expires on \_\_\_\_/\_\_\_\_/\_\_\_\_

**PART V: Self Check, CFSA Resource Parent, and CFSA Kinship Caregiver Verification**

**CFSA USE ONLY:** Identification has been shown to me that I have deemed satisfactorily identifies the applicant:

Type of ID		ID #	
CFSA Employee Name (print)			
CFSA Employee Title (print)			
CFSA Employee Signature			

# Exhibit 37



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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON,  
  
Plaintiff,  
  
v.  
  
DONALD TRUMP in his official capacity  
as President of the United States, et al.,  
  
Defendants.

NO. 2:18-cv-00939-RAJ

DECLARATION OF \_\_\_\_\_  
RICHARD AUSTRIA

I, Richard Austria, declare as follows:

1. I am over the age of 18 and have personal knowledge of all the facts stated herein.
2. I am an investigator for the Oregon Department of Justice.
3. I have made several calls to request access to the Sheridan Federal Prison for the purpose of interviewing immigration detainees who had been separated from their children. I have not received a single return call from any of the messages I left.
4. On June 15, 2018, at 2:54pm, I called the Sheridan Federal Prison identifying myself as working for the Oregon Attorney General's office and seeking access to the detainees. I specifically left message to have Shawn Price or any person able to allow access to call me back. To date, I have not received a return call.



# Exhibit 38

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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON, et al.,

Plaintiff,

v.

DONALD TRUMP in his official capacity  
as President of the United States, et al.,

Defendants.

NO. 18-cv-00939

DECLARATION OF LAURA VELEZ

I, Laura Velez, declare as follows:

1. I am over the age of 18 and have personal knowledge of all the facts stated herein.
2. I am the Deputy Commissioner in charge of the Bureau of Child Welfare and Community Services (CWCS) of the New York State Office of Children and Family Services (OCFS).

**A. OCFS's Interest in Promoting Family Unity**

3. The mission of OCFS is to promote the safety, permanency, and well-being of children, families, and communities in New York State. OCFS is dedicated to overseeing integrated services for New York's children, youth, families, and other vulnerable populations. OCFS is also dedicated to promoting the growth and development of these groups as well as protecting these groups from trauma, violence, neglect, abuse, and abandonment.

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4. OCFS is dedicated to keeping families together whenever possible. Our policies are driven by the well-accepted notion that family unity is the most desired outcome for children. Indeed, it is the long-established policy and practice of OCFS to prioritize keeping a child with his or her parents. Thus, our first obligation is to provide families with “preventive services” aimed at preventing families from breaking apart. When separation is unfortunately necessary, it is the primary goal of the agency to quickly and safely reunite children with their parents. *See* N.Y. Serv. Law § 384-b(1); N.Y. Exec. Law § 990.

5. The prioritization of family unity is set forth in the legislative findings accompanying Section 384-b(1)(a) of the Social Services Law, which concerns guardianship and custody of destitute or dependent children. For example, the legislature found that:

a. “It is desirable for children to grow up with a normal family in a permanent home and that such circumstances offer the best opportunity for children to develop and thrive,” *id.* § 384-b(1)(a)(i);

b. “It is generally desirable for the child to remain with or be returned to the birth parent because the child’s need for a normal family life will usually best be met in the home of the birth parent, and that parents are entitled to bring up their own children unless the best interests of the child would thereby be endangered,” *id.* § 384-b(1)(a)(ii);

c. “The state’s first obligation is to help the family with services to prevent its break-up or to reunite it if the child has already left home,” *id.* § 384-b(1)(a)(iii);

d. “When it is clear that the birth parent cannot or will not provide a normal family home for the child and when continued foster care is not an appropriate plan for the child, then a permanent alternative home should be sought for the child,” *id.* § 384-b(1)(a)(iv).

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6. OCFS also operates under a principle of non-discrimination. To that end, OCFS promulgates regulatory standards that expressly prohibit discrimination or harassment of adults or children involved in child welfare programs and services based on race, creed, color, national origin, age, sex, religion, sexual orientation, gender identity or expression, marital status or disability. N.Y. Comp. Codes R. & Regs. Tit. 18 §§ 421.3, 423.4, 441.24.

**B. OCFS’s Licensing and Oversight Responsibilities**

7. OCFS regulates and supervises the child welfare activities of each local department of social services (LDSS) in each New York State county. N.Y. Soc. Serv. Law §§ 20, 34. In addition, OCFS regulates, licenses, inspects, and supervises residential programs that care for foster children in New York State. *Id.* §§ 460-b, 460-c, 462-a. OCFS certifies facilities that provide residential care for foster children and also sets standards for certification and approval of foster family boarding homes through regulation. *Id.* §§ 20, 34, 378 and 460-b.

8. OCFS issues operating certificates to voluntary authorized agencies in New York State that care for children placed in the Unaccompanied Alien Children (UAC) program (UACs), which now includes children who have been separated from their parents at the Southwestern border. A voluntary authorized agency, as defined in N.Y. Soc. Serv. Law § 371(10)(a), is a not-for-profit corporation organized under the laws of the State of New York and approved by OCFS to “care for” (i.e., operate residential programs), “place out” (i.e., operate an adoption program) or “board out” (i.e., operate a foster family boarding home program). Depending on the operating authority of the voluntary agency and the contract with the Office of Refugee Resettlement (ORR), some voluntary agencies provide residential care to UACs, some place them in federal foster family homes, and some do both. The voluntary agency may also work with ORR to find

1 appropriate sponsors (i.e., family members) and facilitate the children moving to reside  
2 with the sponsors who are then responsible to care for the children.

3 9. Although these voluntary agencies contract with ORR, which pays these  
4 voluntary agencies to provide care to children in the UAC program, OCFS remains the  
5 licensing agency for children's residential programs in New York State. As such, OCFS  
6 retains authority over the voluntary agencies, including the programs that serve UAC  
7 children. Specifically, OCFS retains the authority to conduct building, equipment, fire,  
8 and safety inspections of these facilities. OCFS also has the authority to establish  
9 regulatory standards for the certification or approval of all foster homes in New York  
10 State. N.Y. Soc. Serv. Law §§ 20, 34, 378, 460-a; N.Y. Not-for-Profit Corp. Law §  
11 404(b).

12 10. ORR currently contracts with eleven voluntary agencies in New York State to  
13 provide care to the children ORR moves into the UAC program in New York State:  
14 Abbott House; Catholic Family Center; Catholic Guardian Services; Cayuga Home for  
15 Children; Children's Home of Kingston; Children's Village; Jewish Child Care  
16 Association of New York; Rising Ground (formerly Leake and Watts Services); Lincoln  
17 Hall; Lutheran Social Services of New York; and MercyFirst.

18 **C. Children Separated From Their Families at the Southwestern Border.**

19 11. In response to New York State's request for information, HHS represented that  
20 on June 18, 2018, there were at least 1,292 children in the UAC program in the care of  
21 nine agencies in New York State. However, HHS did not inform New York State what  
22 subset of these 1,292 children had been separated from their families at the Southwestern  
23 border. Additionally, the 1,292 number was an undercount because HHS failed to  
24 account for children in the care of two providers licensed by New York State to serve  
25 children in the UAC program.  
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12. Moreover, the 1,292 number does not provide the full picture of the children who have been sent to New York State by HHS as part of the UAC program. First, that number is a point-of-time snapshot; it does not tell us the total number of children who were separated from their parents and placed in the UAC program in New York State over time since the “zero tolerance” policy was put into effect in April 2018. Second, it does not reflect the number of children who were placed with New York State sponsor families. Because of these and other limitations regarding the information provided by HHS, New York State decided to conduct further investigation.

13. Specifically, based on OCFS’s investigation, the agency estimated that on June 22, 2018, 321 of the children in the UAC program in New York State had separated from their parents at the Southwestern border. Again, OCFS’s investigation was limited to children in the UAC program on that date. This point-in-time snapshot does not include any separated children who had been transferred out of the UAC program to sponsor homes in (or outside of) New York State, or children who entered the UAC program after June 22, 2018. Nor does it reflect the total number of separated children who have been sent to New York State since the inception of the separation policy.

14. OCFS staff have visited all eleven agencies to review records, confirm that medical and mental-health assessments are being performed, and to confirm that the agencies are otherwise in compliance. In the course of OCFS’ visits, we determined that the majority of children who had been separated from their parents were between the ages of five and thirteen. Although the children appear to be physically well and properly cared for by the agencies, some children were able to clearly express their sadness and how very much they missed their mothers, fathers, siblings and other family members.



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**D. State Protections for Parents and Children**

14. New York State goes to great lengths to provide significant due process protections for both parents and children when families are separated because of government action. When a child is placed in foster care in New York, state statutes and regulations afford both the parent and the child a range of rights, including the right of visitation. Indeed, the child's family service plan must include a plan for regular visitation between the parents and child. N.Y. Soc. Serv. Law § 409-e; N.Y. Comp. Codes R. & Regs. Tit. 18 § 428.6. *See also* N.Y. Fam. Ct. Act § 1030(a) (providing that a parent has a right of regular and reasonable visitation with a child in foster care unless otherwise prohibited by court order).

15. Parents have a right to regular visitation even when they are incarcerated in prison or jail. In that situation, the child welfare agency must make suitable arrangements with the correctional facility for a parent to visit with the child, unless the visit would be harmful to the child or visitation is prohibited by court order. 11 OCFS-ADM-07; *see also* N.Y. Fam. Ct. Act § 1030(a). Moreover, parents who are incarcerated are entitled to participate in the planning for their child in foster care by participating in family court proceedings and periodic family service plan reviews. *See* N.Y. Comp. Codes R. & Regs. Tit. 18 § 428.9. To protect these vital rights, state law provides that the parent of a child in foster care has a right to counsel assigned by the court where such parent is financially unable to obtain one. N.Y. Family Court Act § 262. Such rules are premised on the importance of the parent-child bond, and a recognition of the parent's critical, indispensable role in assuring that the needs of his or her child are met.

16. The parents and children whom Defendants have separated at the border have not been afforded these visitation procedures, nor has there been any process to recognize or protect their rights. Defendants' disregard for the rights of these children and families is

1 deeply harmful to these children, undermines OCFS's ability to provide for their health,  
2 safety and well-being, and results in these children being treated differently than other  
3 children that are similarly in the state's care.

4 **E. Post-Placement Services**

5 17. Once a child in the UAC program is placed with a sponsor in New York State,  
6 the child is no longer considered to be in federal custody. At that point, the child is  
7 entitled to a variety of services funded by the state, including educational services, early  
8 intervention services, and access to healthcare, among others. New York State makes  
9 these services available to such children, often at the states' expense, in support of the  
10 state's interest in providing for the health, safety, and well-being of all residents.

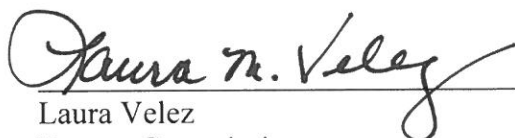
11 18. A child's placements with a sponsor may be disrupted for a variety of reasons. If  
12 the child becomes at risk of entering foster care—for example, because of allegations of  
13 abuse or neglect by the person now legally responsible for the child—the child welfare  
14 system will provide preventive services to attempt to keep the child safely in the new  
15 home; such services are funded, in part, by New York State. If those services are  
16 unsuccessful and the child must be removed from the sponsor's home, New York State  
17 will also partly fund the child's placement in a new foster home and needed services  
18 while in the foster care system.

19 19. New York State announced that it would make additional services available for  
20 unaccompanied minor children, including children who had been separated from their  
21 parents at the border. Among other assistance, the State will (a) dispatch personnel,  
22 resources, and services to foster care providers that are caring for these children; (b)  
23 provide funding for targeted, community-based services, including, but not limited to  
24 mental health and trauma-informed care, accessing and navigating the healthcare and  
25 public education systems, and other integration-related services for immigrant children  
26

1 discharged from foster care facilities to sponsor family members; (c) take actions to  
2 support family reunification, including working with consulates at foster care facilities  
3 to provide immediate support for identifying family units; (d) provide group and  
4 individual counseling to children, sponsors, and reunited families; and (e) provide  
5 information and referral services to assist families with their needs. The State will also  
6 expand services under the Liberty Defense Project to provide the children with access to  
7 legal representation. The services will be provided in collaboration with the New York  
8 State Office of New Americans Opportunity Centers.

9 I declare under penalty of perjury under the laws of the State of Washington and the  
10 United States of America that the foregoing is true and correct.

11  
12 DATED this 29<sup>th</sup> day of June, 2018 at Albany, New York.

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16 Laura Velez  
17 Deputy Commissioner  
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# Exhibit 39

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7 **UNITED STATES DISTRICT COURT**  
8 **WESTERN DISTRICT OF WASHINGTON**

9 STATE OF WASHINGTON,

10 Plaintiff,

11 v.

12 DONALD TRUMP in his official capacity  
as President of the United States, et al.,

13 Defendants.

NO. 2:18-cv-00939-RAJ

DECLARATION MARGARITA  
JOSE FRANCISCO

14  
15 I, Margarita Jose Francisco, declare as follows:

- 16 1. I am over the age of 18 and have personal knowledge of all the facts stated  
17 herein.
- 18 2. I am permanent resident of the United States and live in the state of Oregon.
- 19 3. My eight year-old great-nephew, Agosto Manuel Manuel Perez, has been  
20 detained by the United States government in Mesa, Arizona and has been separated from his  
21 father, Andres Manuel Jose, who is being held in New Mexico at the Otero County Processing  
22 Center. They came together from Guatemala to the United States and were separated at the  
23 border approximately one month ago. They want to obtain asylum in this county. Their  
24 mother, Magdalena Perez Silvestre, stayed in Guatemala.

25  
26 DECLARATION MARGARITA JOSE  
FRANCISCO

1

Oregon Department of Justice  
100 SW Market St  
Portland, OR 97201  
Tel: (971) 673-1880 / Fax: (971) 673-5000  
**AutoText entry not defined.**

1           4.       Andres has not seen or been able to speak to his son, although I have deposited  
2 money in Andres' account at the Otero County facility so that he can make phone calls. I have  
3 been able to talk to Andres. I learned from him that Andres was recently told by immigration  
4 officials that if he voluntarily left and returned to Guatemala, he would be immediately  
5 released. Andres declined the offer since he was told he would not be reunited with his son  
6 prior to being released. Andres decided to stay to continue with the asylum process because he  
7 was not going to leave his son.

8           5.       Agosto's mother, Madgalena, has been able to speak with her son on the phone.  
9 When she last spoke to Agosto, approximately ten days ago, Agosto said that he was feeling ill.  
10 She has not been able to speak with him since. Magdelana is very worried about Agosto, as  
11 am I.

12           6.       Magdalena has been contacted by someone in the United States, regarding her  
13 son. I believe they were from Southwest Key Casa Kokopelli. Magdalena cannot read or write  
14 and therefore cannot use this information or communicate it to me.

15           7.       Magdalena did send me legal papers from Guatemala making me Agosto's  
16 guardian. I have contacted ORR five times over the last two weeks to explain that I am his  
17 guardian and to ask that he be released to me so he can stay with me in Oregon. My friend,  
18 Emily Fanjoy at the Tillamook Women's Center, helped on these calls with English and  
19 Spanish. No one at ORR would give us information about Agosto. They instructed me to wait  
20 for Agosto's case manager from the child detention facility to call me. ORR explained that the  
21 center was responsible for sending us the resettlement paperwork. ORR also explained that  
22 they were only permitted to send one contact to the facility every 3 days, and therefore we  
23 should only call every three days. One person said I needed to talk to Agosto's case worker,  
24 but stated that had no way to know who that was, and that they would contact us directly. If  
25 that information was sent to Magdelena, she has been unable to get it to me. I am very  
26

1 frustrated by this process and extremely worried about Agosto and his health and well being. I  
2 just want my great nephew to be with his family where any eight year old child belongs.

3 8. I do not read English or Spanish or my first language, Q'anjob'al, which is a  
4 Mayan language. Therefore, Emily Fanjoy has read this declaration to me. I understand  
5 everything in this declaration and understand the importance of telling the truth. Everything I  
6 say here is true.

7  
8 **I declare under penalty of perjury under the laws of Oregon, Washington and the**  
9 **United States that the foregoing is true and correct.**

10 DATED this 29 day of June, 2018 at Tillamook, Oregon

11  
12 Marta Jose Francisco  
13 Margarita Jose Francisco

# Exhibit 40



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7 **UNITED STATES DISTRICT COURT**  
8 **WESTERN DISTRICT OF WASHINGTON**

9 STATE OF WASHINGTON,

10 Plaintiff,

11 v.

12 DONALD TRUMP in his official capacity  
as President of the United States, et al.,

13 Defendants.

NO. 2:18-cv-00939-RAJ

DECLARATION OF EMILY  
FANJOY REGARDING  
DECLARATION OF MARGARITA  
JOSE FRANCISCO

14  
15 I, Emily Fanjoy, declare as follows:

16 1. I am over the age of 18 and have personal knowledge of all the facts stated  
17 herein.


18 2. I am the Health Programs Coordinator for the Tillamook County Women's  
19 Resource Center. I met Margarita Jose Francisco as a social service provider several years ago,  
20 and have continued to assist her with various needs over the years.

21 3. I am a fluent Spanish speaker and, because I served in the Peace Corps in  
22 Guatemala, I speak some Q'anjob'al, a Mayan language, that is Ms. Francisco's first language.  
23 Ms. Francisco does not read or write in English, Spanish or Q'anjob'al.

1 4. I truthfully and accurately read Ms. Francisco's declaration to her Spanish,  
2 supplementing with Q'anjob'a to the extent necessary. Ms. Francisco confirmed to me that the  
3 declaration was true and accurate and she signed it in my presence.

4 **I declare under penalty of perjury under the laws of Oregon, Washington and the**  
5 **United States that the foregoing is true and correct.**

6 DATED this 29 day of June, 2018 at Tillamook, Oregon

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Emily Fanjoy

# Exhibit 41

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7 **UNITED STATES DISTRICT COURT**  
8 **WESTERN DISTRICT OF WASHINGTON**

9 STATE OF WASHINGTON, et al.,

NO. 18-cv-00939

10 Plaintiff,

DECLARATION OF  
EMARY C. ARONSON

11 v.

12 DONALD TRUMP in his official capacity  
as President of the United States, et al.,

13 Defendants.

14 I, Emary C. Aronson, declare as follows:

15 1. I am over the age of eighteen and have personal knowledge of all the facts stated  
16 herein.

17 2. I am Chief Program Officer for Robin Hood. I oversee Robin Hood's grant-  
18 making efforts to support nonprofit and social services in New York City. I have been employed  
19 by Robin Hood since 1999.

20 3. Robin Hood is one of New York City's largest poverty-fighting organizations.  
21 Since its founding in 1988, Robin Hood has raised more than \$2.5 billion in dollars, goods and  
22 services to provide for hundreds of the most effective early childhood development programs,  
23 schools, legal services nonprofits, healthcare clinics, homeless shelters and other vital services  
24 in our city. Robin Hood's mission is to ensure that New York's neediest children and families  
25 have the tools they need to build better lives. Our work is based on a rigorous set of metrics that  
26

1 measures the relationship between the cost of an intervention and the economic and social  
2 benefits it produces for the individual being served.

3 4. Consistent with our mission is the belief that **all children** present in New York  
4 City, regardless of nativity or immigration status, have the right to safety, to grow up in a  
5 nurturing environment with their parent or guardian, to be educated, to enjoy their childhood,  
6 and to receive due process in immigration proceedings.

7 5. Robin Hood invests more than \$30 million annually to support programs that  
8 promote early childhood development, including initiatives focused on the crucial first 1,000  
9 days of life. More than 50 years of research demonstrates that the lack of nurturing care from a  
10 parent or committed caregiver, social interaction, appropriate stimulation, and psychological  
11 comfort lead to a number of deleterious impacts that have lifelong consequences for children<sup>1,2</sup>.  
12 These include serious impairments to healthy development leading to cognitive delays and  
13 emotional dysregulation. Moreover, adverse childhood experiences, including even the brief  
14 separation of children from their parents, are directly correlated with increased risk of  
15 depression, suicidality, long-term physical health problems, substance abuse disorders, and other  
16 social ills<sup>3</sup>.

17 6. Robin Hood also invests more than \$5 million annually in programs that provide  
18 immigration legal services. In 2013, we launched Immigrant Justice Corps, the country's first  
19 legal fellowship program focused on immigration services. That program has now served more  
20 than 40,000 immigrants in four states. In 2014, we also helped establish the ICARE Coalition,  
21

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22 <sup>1</sup> National Scientific Council on the Developing Child. (2012). *The Science of Neglect: The Persistent*  
23 *Absence of Responsive Care Disrupts the Developing Brain: Working Paper 12.*  
<http://www.developingchild.harvard.edu>

24 <sup>2</sup> Nelson, C.A, Fox, N.A., & Zeanah, C.H. (2014). *Romania's Abandoned Children*. Cambridge, MA:  
Harvard University Press.

25 <sup>3</sup> Felitti, V.J., et al. (1998). Relationship of childhood abuse and household dysfunction to many of the  
26 leading causes of death in adults. The Adverse Childhood Experiences (ACE) Study. *American Journal of*  
*Preventative Medicine*, 14(4), 245-258.

1 which has provided legal counsel to nearly 1,500 Central American unaccompanied minors in  
2 New York City. We make these investments because attaining legal status provides a long-term  
3 pathway out of poverty for immigrants in our city. Data from the Transactional Records Access  
4 Clearinghouse at Syracuse University demonstrate that legal representation in immigration  
5 proceedings increases the probability of a grant of legal status by at least 400 percent. However,  
6 the federal government does not appoint counsel in immigration proceedings, thereby  
7 endangering immigrant children’s right to due process, diminishing the likelihood they will  
8 attain legal status and permanent work authorization, and constraining their ability to contribute  
9 to our society and our economy into adulthood.

10 7. Robin Hood funds more than 200 nonprofit organizations every year. Through  
11 our work, we have an intimate knowledge of the impact that shifts in federal policy can have on  
12 local nonprofit operations. Without clear planning, communications, and transparent data  
13 sharing in the implementation of new policies at the federal level, local social services are  
14 severely disrupted. Nonprofit executives, attorneys, social workers and clinicians can be pulled  
15 away from serving their regular clients to coordinate and respond to emergency needs.

16 8. We have learned that at least 300 children who were forcibly separated from their  
17 parents are currently in New York City as a result of the “zero-tolerance policy.” We have been  
18 in contact with more than two dozen agencies involved in mounting a local emergency response  
19 to the situation. This outreach has included federal officials, state and local government  
20 agencies, foster care agencies caring for these children, nonprofit legal services providers,  
21 experts on the health and mental health of young children, and national and local philanthropic  
22 organizations.

23 9. We know that organizations in New York City involved in this effort are  
24 operating at the highest levels of professionalism and care for these vulnerable children.  
25 However, the current situation resulting from the “zero-tolerance policy” has demanded a far  
26 greater volume and type of service than historically they have been funded to provide. We have

1 learned that these children, in being separated from their parents, have experienced severe  
2 trauma, compounded as they have faced difficulty in contacting or being reunited with their  
3 parents or caregivers. Nonprofit legal services providers do not have sufficient staffing or space  
4 to provide counsel to all those in need and are having to quickly gain new expertise to be able to  
5 serve children who are pre-verbal. Translation services are also lacking, particularly for those  
6 who children speak indigenous Central American languages. Immigrant children are now  
7 spending twice as long in foster care as they have historically, as potential sponsor families are  
8 reluctant to come forward due to increased immigration enforcement activities nationwide. As  
9 a result, local governments and philanthropic institutions will likely need to divert millions of  
10 dollars to ensure an effective and humane response to the situation on the ground.

11 10. We firmly believe that preserving the rights of asylum seekers, including young  
12 children, as already enshrined in our laws, is vital to the fair administration of justice, to the  
13 alleviation of poverty, and to our country's economic prosperity.

14 11. The "zero-tolerance policy" instituted at our border, which directly led to the  
15 separation of children and parents, has caused irreparable social and emotional trauma to the  
16 hundreds of children now in our city as well as to their families detained across the country. This  
17 is not a political issue. This policy has denied them and their families their fundamental right to  
18 due process, overburdened local nonprofit services providers, and increased the likelihood that  
19 these vulnerable children will live their lives in poverty.

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I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

DATED this 29th day of June, 2018 at New York, New York.



Emary C. Aronson  
Chief Program Officer  
Robin Hood



# Exhibit 42

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7 **UNITED STATES DISTRICT COURT**  
8 **WESTERN DISTRICT OF WASHINGTON**

9 STATE OF WASHINGTON, et al.

10 Plaintiff,

11 v.

12 THE UNITED STATES OF AMERICA,  
et al.,

13 Defendants.

NO. 2:18-CV-00939

DECLARATION OF TOM K. WONG  
IN SUPPORT OF PLAINTIFFS'  
MOTION FOR EXPEDITED  
DISCOVERY

14 I, Tom K. Wong, declare as follows:

15 1. I am over the age of 18 and have personal knowledge of all the facts stated herein.

16 If called as a witness, I could and would testify competently to the matters set forth below.

17 2. I am an Associate Professor with tenure at the University of California, San  
18 Diego (UCSD). I work in the political science department, which is consistently ranked by U.S.  
19 News & World Report as one of the top ten political science departments nationally. I am also  
20 the Director of the International Migration Studies Program Minor at UCSD.

21 3. I am an expert on immigration. I have written two peer-reviewed books and  
22 several peer-reviewed journal articles, book chapters, and reports on this subject. My most recent  
23 book analyzes 31,193 roll call votes on immigration-related legislation in Congress from 2005  
24 to present, which makes it the most comprehensive analysis to date on contemporary  
25 immigration policies in the United States.  
26

1           4.       I received a Ph.D. in political science at the end of the 2010-2011 academic year.  
2 I was a post-doctoral research fellow during the 2011-2012 academic year. I joined the political  
3 science department at UCSD during the 2012-2013 academic year. I served as an advisor to the  
4 White House Initiative on Asian Americans and Pacific Islanders (WHIAAPI), where I worked  
5 on the immigration portfolio, during the 2015-2016 academic year. I was promoted to the rank  
6 of Associate Professor with tenure at UCSD during the 2016-2017 academic year.

7           5.       I have attached a true and complete copy of my curriculum vitae as Exhibit A to  
8 this Declaration.

9           6.       Data on the monthly number of U.S. Border Patrol apprehensions of family units  
10 at the Southwest border show that recent policies intended to deter families from attempting to  
11 enter the U.S. without authorization have not had their desired deterrent effects. The data show  
12 that the expanded use of family detention is not statistically significantly related to decreases in  
13 the monthly number of U.S. Border Patrol apprehensions of family units at the Southwest border.  
14 The data also show that the use of family separation is not statistically significantly related to  
15 decreases in the monthly number of U.S. Border Patrol apprehensions of family units at the  
16 Southwest border; instead, U.S. Border Patrol apprehensions of family units at the Southwest  
17 border have increased following the current administration’s “zero tolerance” pilot. Moreover,  
18 the data show that U.S. Border Patrol apprehensions of family units at the Southwest border have  
19 followed seasonal trends, wherein the monthly number of apprehensions increases beginning  
20 late Winter (February and March) and continues to increase through Spring (April, May, and  
21 June) before declining at the start Summer (July).

22           7.       In my first set of analyses, I evaluate changes over time in the monthly number  
23 of U.S. Border Patrol apprehensions of family units at the Southwest border from October 2012  
24 to May 2018.<sup>1</sup> To the best of my knowledge, these data represent the range of publicly available  
25

26           <sup>1</sup> Data for Fiscal Year 2012 are available at (last accessed June 28, 2018):  
<https://www.cbp.gov/newsroom/stats/southwest-border-unaccompanied-children/fy-2016>. Data for Fiscal Year

1 data from U.S. Customs and Border Protection on the monthly number of U.S. Border Patrol  
2 apprehensions of family units at the Southwest border.

3 8. The method used to analyze these data is interrupted times series analysis  
4 (ITSA).<sup>2</sup> ITSA is a quasi-experimental research design, meaning a research design that evaluates  
5 causal effects using observational data, that is, data that do not come from experimental research  
6 that makes use of random assignment to control and treatment conditions. ITSA is used to  
7 evaluate trends before, immediately following, and during the period after an intervention, such  
8 as a policy change. ITSA estimates three main parameters:  $\beta_1$  is the slope or trajectory of the  
9 outcome variable before the start of the policy change;  $\beta_2$  is the change in the level of the outcome  
10 variable in the period immediately following the start of the policy change; and  $\beta_3$  is the effect of  
11 the policy change over time.

12 9. In response to the increase in the number of arrivals of Central American families  
13 and unaccompanied children at the Southwest border in 2014, the Karnes County Residential  
14 Center was converted from a civil detention facility to a family detention facility in July 2014.<sup>3</sup>  
15 During this time, families were also detained at a temporary facility in Artesia, New Mexico  
16 before the South Texas Family Residential Center in Dilley, Texas opened in December 2014.  
17 The conversion of the Karnes County Residential Center and the opening of the South Texas  
18 Family Residential Center represented major shifts, as the use of family detention had been  
19 largely abandoned by the Obama administration prior to 2014.<sup>4</sup> When delivering remarks at the  
20

21 2013 to Fiscal Year 2017 are available at (last accessed June 28, 2018):  
22 [https://www.cbp.gov/sites/default/files/assets/documents/2017-  
23 Dec/BP%20Total%20Monthly%20Family%20Units%20by%20Sector%2C%20FY13-FY17.pdf](https://www.cbp.gov/sites/default/files/assets/documents/2017-Dec/BP%20Total%20Monthly%20Family%20Units%20by%20Sector%2C%20FY13-FY17.pdf). Data for Fiscal  
24 Year 2018 are available at (last accessed June 28, 2018): [https://www.cbp.gov/newsroom/stats/sw-border-  
25 migration](https://www.cbp.gov/newsroom/stats/sw-border-migration).

26 <sup>2</sup> Linden, Ariel. 2015. "Conducting interrupted time-series analysis for single- and multiple-group  
comparisons." *The Stata Journal* 15(2): 480-500.

<sup>3</sup> Available at (last accessed June 28, 2018): <https://www.geogroup.com/FacilityDetail/FacilityID/58>.  
The Karnes County Residential Center is managed by GEO Group, Inc. under an intergovernmental service  
agreement with Immigration and Customs Enforcement (ICE).

<sup>4</sup> For example, see (last accessed June 28, 2018): [https://www.aclu.org/files/field\\_document/ACLU%20-  
%20Family%20Detention.pdf](https://www.aclu.org/files/field_document/ACLU%20-%20Family%20Detention.pdf).

1 opening of the South Texas Family Residential Center, then Secretary Jeh Johnson stated, “I  
2 believe this is an effective deterrent.”<sup>5</sup>

3 10. Using ITSA, I analyze the potential deterrent effect of the expanded use of family  
4 detention on the monthly number of U.S. Border Patrol apprehensions of family units at the  
5 Southwest border.

6 11. The results are reported in Table 1 below.<sup>6</sup> Model 1 estimates the relationship  
7 between the expanded use of family detention, measured by the conversion of the Karnes County  
8 Residential Center in July 2014 ( $\beta_2$ ) and each subsequent month thereafter ( $\beta_3$ ), and the monthly  
9 number of U.S. Border Patrol apprehensions of family units at the Southwest border. If the  
10 expanded use of family detention has a deterrent effect, we would expect  $\beta_2$  and  $\beta_3$  to be negative  
11 and statistically significant, meaning the monthly number of U.S. Border Patrol apprehensions  
12 of family units at the Southwest border decreases with the expanded use of family detention.

13 12. In Model 1, the  $\beta_1$  coefficient is positive and statistically significant, which  
14 affirms that the monthly number of U.S. Border Patrol apprehensions of family units at the  
15 Southwest border was increasing before July 2014. However, both the  $\beta_2$  and  $\beta_3$  coefficients are  
16 statistically insignificant, which suggests that the expanded use of family detention is not  
17 statistically significantly related to an immediate decrease or longer-term decreases in the  
18 monthly number of U.S. Border Patrol apprehensions of family units at the Southwest border.  
19 Otherwise put, the data do not provide evidence to suggest that family detention has a deterrent  
20 effect, as the monthly number of U.S. Border Patrol apprehensions of family units at the  
21 Southwest border was increasing before July 2014, and apprehensions did not decrease in a  
22 statistically significant way after July 2014.

23  
24  
25 <sup>5</sup> Available at (last accessed June 28, 2018): <http://nytimes.com/2014/12/16/us/homeland-security-chief-opens-largest-immigration-detention-center-in-us.html>.

26 <sup>6</sup> An autoregressive model AR(1) is specified and Newey-West standard errors are used to address autocorrelation.

Table 1

	Model 1
$\beta_1$ Pre July 2014	227.9** (88.27)
$\beta_2$ July 2014	-2,708.1 (2,002.46)
$\beta_3$ Post July 2014	-140.5 (97.38)
$\beta_0$ Constant	-1,179.1 (1,037.25)
Observations	80

Note: eight additional models were run specifying eight different pseudo-interventions, which all produce qualitatively similar results. \* significant at the .05 level; \*\* significant at the .01 level; \*\*\* significant at the .001 level.

13. Moreover, eight additional models were run specifying eight different pseudo-interventions, meaning different start dates for the expanded use of family detention. These pseudo-interventions address the possibility that policy changes need time to take effect. The pseudo-interventions analyzed include the months shortly after the conversion of the Karnes County Residential Center, the month of the opening of the South Texas Family Residential Center, and the three months after the opening of the South Texas Family Residential Center.<sup>7</sup> These models produce qualitatively similar results, wherein the expanded use of family detention is not statistically significantly related to decreases in the monthly number of U.S. Border Patrol apprehensions of family units at the Southwest border.

14. Recent events provide a second intervention to test. Beginning in July 2017, as reported by the *New York Times*<sup>8</sup> and by *Vox*,<sup>9</sup> the Trump administration piloted a zero tolerance policy, wherein all persons caught attempting to enter the U.S. without authorization are referred to the Department of Justice for prosecution, including parents who are apprehended with their

<sup>7</sup> These models specify the intervention as August 2014, or September 2014, or October 2014, or November 2014, or December 2014, or January 2015, or February 2015, or March 2015.

<sup>8</sup> Available at (last accessed June 28, 2018): <https://www.nytimes.com/2018/04/20/us/immigrant-children-separation-ice.html>.

<sup>9</sup> Available at (last accessed June 28, 2018): <https://www.vox.com/policy-and-politics/2018/5/8/17327512/sessions-illegal-immigration-border-asylum-families>.

1 children. As it relates to family units, in prosecuting all persons caught attempting to enter the  
2 U.S. without authorization, children have been separated from their parents. Whereas the Obama  
3 administration used family detention in response to Central American families and  
4 unaccompanied children arriving at the Southwest border, the Trump administration has used  
5 family separation. In March 2017, in response to the question of whether the Trump  
6 administration was going to separate children from their parents, current White House Chief of  
7 Staff and then Department of Homeland Security Secretary John F. Kelly stated, “Yes, I am  
8 considering, in order to deter more movement along this terribly dangerous network [migrating  
9 from Central America through Mexico to the U.S.], I am considering exactly that.”<sup>10</sup> As recently  
10 as June 2018, Attorney General Jeff Sessions reiterated the administration’s belief in the  
11 deterrent effect of family separation stating, “We cannot and will not encourage people to bring  
12 their children or other children to the country unlawfully by giving them immunity in the  
13 process.”<sup>11</sup>

14 15. Using ITSA, I analyze the deterrent effect of family separation on the monthly  
15 number of U.S. Border Patrol apprehensions of family units at the Southwest border.

16 16. The results are reported in Table 2 below.<sup>12</sup> Model 2 estimates the relationship  
17 between the use of family separation, measured by the beginning of the zero tolerance pilot in  
18 July 2017 ( $\beta_4$ ) and each subsequent month thereafter ( $\beta_5$ ), and the monthly number of U.S.  
19 Border Patrol apprehensions of family units at the Southwest border while controlling for the  
20 expanded use of family detention in July 2014.

21  
22 <sup>10</sup> Available at (last accessed June 28, 2018):

23 [https://twitter.com/CNNSitRoom/status/838877868453064704?ref\\_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwtterm%5E838877868453064704&ref\\_url=http%3A%2F%2Fwww.businessinsider.com%2Fkelly-proposed-family-separation-to-deter-illegal-immigration-in-2017-2018-6](https://twitter.com/CNNSitRoom/status/838877868453064704?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwtterm%5E838877868453064704&ref_url=http%3A%2F%2Fwww.businessinsider.com%2Fkelly-proposed-family-separation-to-deter-illegal-immigration-in-2017-2018-6).

24 <sup>11</sup> Available at (last accessed June 28, 2018):

25 [https://twitter.com/NBCNews/status/1008736238495559680?ref\\_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwtterm%5E1008736238495559680&ref\\_url=http%3A%2F%2Fthehill.com%2Fhomenews%2Fadministration%2F392785-sessions-on-separating-families-if-we-build-a-wall-and-pass](https://twitter.com/NBCNews/status/1008736238495559680?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwtterm%5E1008736238495559680&ref_url=http%3A%2F%2Fthehill.com%2Fhomenews%2Fadministration%2F392785-sessions-on-separating-families-if-we-build-a-wall-and-pass).

26 <sup>12</sup> An autoregressive model AR(1) is specified and Newey-West standard errors are used to address autocorrelation.

1 17. In Model 2, the  $\beta_1$  coefficient remains positive and statistically significant, again  
2 affirming that the monthly number of U.S. Border Patrol apprehensions of family units at the  
3 Southwest border was increasing before July 2014. Both the  $\beta_2$  and  $\beta_3$  coefficients remain  
4 statistically insignificant, also affirming the results in Model 1. The  $\beta_4$  coefficient is statistically  
5 insignificant, which suggests that family separation is not statistically significantly related to an  
6 immediate decrease in the monthly number of U.S. Border Patrol apprehensions of family units  
7 at the Southwest border. Unexpectedly, the  $\beta_5$  coefficient is positive and highly statistically  
8 significant, which means that instead of a deterrent effect, the monthly number of U.S. Border  
9 Patrol apprehensions of family units at the Southwest border has increased significantly after  
10 July 2017. Otherwise put, the data do not provide evidence to suggest that family separation has  
11 a deterrent effect, as the monthly number of U.S. Border Patrol apprehensions of family units at  
12 the Southwest border has increased after July 2017, not decreased.

13 Table 2

	Model 2
$\beta_1$ Pre July 2014	227.9** (88.27)
$\beta_2$ July 2014	-3,090.3 (2,165.09)
$\beta_3$ Post July 2014	-105.83 (134.39)
$\beta_4$ July 2017	-4,093.9 (2,469.00)
$\beta_5$ Post July 2017	464.6*** (115.03)
$\beta_0$ Constant	-1,179.1 (1,051.17)
Observations	80

14 Note: seven additional models were run specifying seven different pseudo-interventions, which all  
15 produce qualitatively similar results. \* significant at the .05 level; \*\* significant at the .01 level; \*\*\*  
16 significant at the .001 level.

17 18. Moreover, seven additional models were run specifying seven different pseudo-  
18 interventions. To recall, these pseudo-interventions address the possibility that policy changes  
19  
20  
21  
22  
23  
24  
25  
26



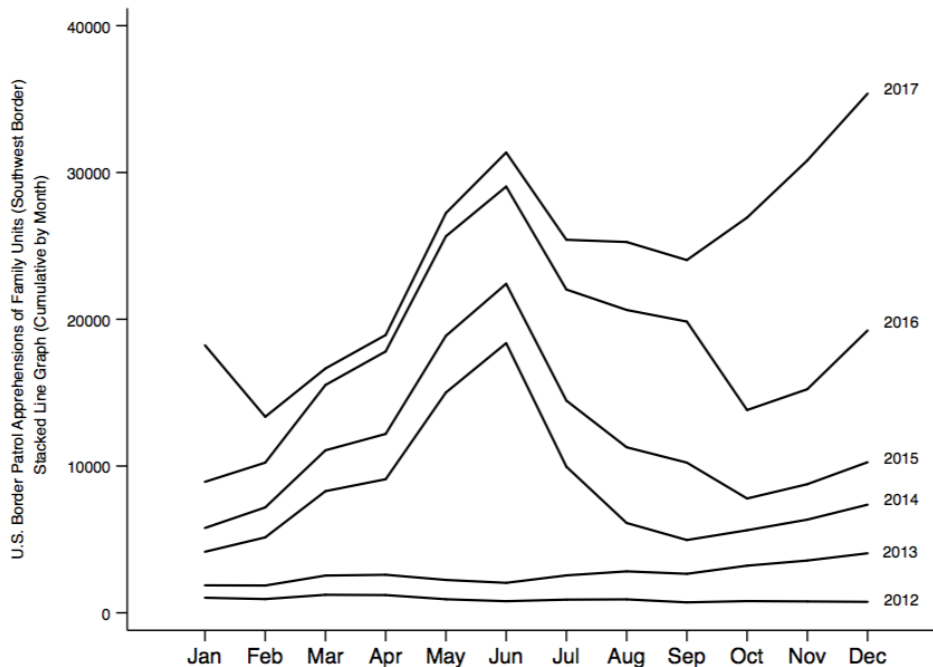
1 need time to take effect. The pseudo-interventions analyzed include the months during the zero  
2 tolerance pilot after July 2017 (August 2017 to November 2017), as well as the three months  
3 after the zero tolerance pilot.<sup>13</sup> These models produce qualitatively similar results, wherein  
4 instead of a deterrent effect, the monthly number of U.S. Border Patrol apprehensions of family  
5 units at the Southwest border has increased significantly after the zero tolerance pilot, not  
6 decreased.

7  
8 19. In my last set of analyses, I turn to the more rigorous Autoregressive Integrated  
9 Moving Average (ARIMA) interrupted time series method. ARIMA is the primary method of  
10 analyzing quasi-experimental time series data. The ARIMA interrupted time series method  
11 removes time trends (the “noise”) in order to isolate the impact of an intervention, such as a  
12 policy change (the “signal”). ARIMA modeling begins by identifying and removing noise,  
13 meaning the extent to which the data in a time series can be accurately predicted by time itself  
14 (for example, addressing the extent to which the number of U.S. Border Patrol apprehensions of  
15 family units at the Southwest border in one month can be accurately predicted by the number of  
16 apprehensions during the previous month [autocorrelation] or the extent to which the number of  
17 U.S. Border Patrol apprehensions of family units at the Southwest border in one month can be  
18 accurately predicted by the number of apprehensions during the same month in a previous year  
19 [seasonality]). After identifying and removing noise, this allows us to evaluate the extent to  
20 which an intervention has an effect on our outcome of interest that is independent from  
21 underlying time trends. Otherwise put, this allows us to evaluate whether policy changes such as  
22 the expanded use of family detention or the use of family separation more accurately predict the  
23 monthly number of U.S. Border Patrol apprehensions of family units at the Southwest border  
24 than seasonal patterns or other time trends.

25  
26 <sup>13</sup> These models specify the intervention as August 2017, or September 2017, or October 2017, or  
November 2017, or December 2017, or January 2018, or February 2018.

20. ARIMA modeling is important for our purposes here given the data on the monthly number of U.S. Border Patrol apprehensions of family units at the Southwest border exhibit seasonal trends. The figure below is a stacked line graph that shows the cumulative number of U.S. Border Patrol apprehensions of family units at the Southwest border by month from 2012 to 2017.<sup>14</sup> As the figure shows, a strong seasonal trend emerges in 2014, wherein the monthly number of U.S. Border Patrol apprehensions of family units at the Southwest border increases beginning late-Winter (February and March) and continues to increase through Spring (April, May, and June) before declining at the start Summer (July). The figure also shows that a second peak may be emerging in Fall (October, November, December), however, it is too soon to tell if this trend will hold given 2017 was the first year in the time series that we saw large numbers of U.S. Border Patrol apprehensions of family units during these months.

Figure 1



<sup>14</sup> These are the years in the time series for which monthly data on U.S. Border Patrol apprehensions of family units at the Southwest border are available for all of the months in the year.

21. Table 3 reports the results of the ARIMA interrupted times series analysis. Model 3 shows that after identifying and removing time trends,<sup>15</sup> there is no statistically significant relationship between the expanded use of family detention, measured by the conversion of the Karnes County Residential Center in July 2014, and the monthly number of U.S. Border Patrol apprehensions of family units at the Southwest border. Model 4 shows that after identifying and removing time trends,<sup>16</sup> there is no statistically significant relationship between family separations, measured by the beginning of the zero tolerance pilot in July 2017, and the monthly number of U.S. Border Patrol apprehensions of family units at the Southwest border. Model 5, which includes both interventions, produces qualitatively similar results.<sup>17</sup>

Table 3

	Model 3	Model 4	Model 5
	ARIMA(1,1,0)	ARIMA(1,1,0)	ARIMA(1,1,0)
July 2014	-.135 (.135)		-.173 (.135)
July 2017		.101 (.197)	.178 (.196)
Observations	79	79	79

Note: fifteen additional models were run specifying fifteen different pseudo-interventions, which all produce qualitatively similar results.

### Conclusion

22. Altogether, data on the monthly number of U.S. Border Patrol apprehensions of family units at the Southwest border shows that recent policies intended to deter families from attempting to enter the U.S. without authorization have not had their desired deterrent effects.

- As the data show, the expanded use of family detention is not statistically significantly related to decreases in the monthly number of U.S. Border Patrol apprehensions of family units at the Southwest border. This result is robust when

<sup>15</sup> The dependent variable in Model 3 is the first order difference of the natural log of the monthly number of U.S. Border Patrol apprehensions of family units at the Southwest border.

<sup>16</sup> The dependent variable in Model 4 is also the first order difference of the natural log of the monthly number of U.S. Border Patrol apprehensions of family units at the Southwest border.

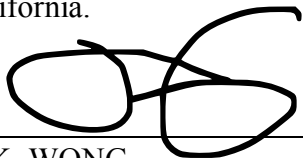
<sup>17</sup> These results are also robust when testing the range of pseudo-interventions described above.

1 testing eight pseudo-interventions and when using ARIMA interrupted time series  
2 analysis.

- 3
- 4 • As the data also show, the use of family separation is not statistically significantly  
5 related to decreases in the monthly number of U.S. Border Patrol apprehensions of  
6 family units at the Southwest border; instead, U.S. Border Patrol apprehensions of  
7 family units at the Southwest border have increased following the zero tolerance  
8 pilot. This result is robust when testing seven pseudo-interventions and when using  
9 ARIMA interrupted time series analysis.
  - 10 • Moreover, the data show that U.S. Border Patrol apprehensions of family units at the  
11 Southwest border has followed seasonal trends, wherein the monthly number of  
12 apprehensions increases beginning late Winter (February and March) and continues  
13 to increase through Spring (April, May, and June) before declining at the start  
14 Summer (July).

15 I declare under penalty of perjury under the laws of the State of California and the United  
16 States of America that the foregoing is true and correct.

17 DATED this 29<sup>th</sup> day of June, 2018 at San Diego, California.

18   
19 \_\_\_\_\_  
20 TOM K. WONG

# EXHIBIT A

**TOM K. WONG, PH.D.**

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Website: www.tomwongphd.com | bit.ly/tomkwong\_citations

**ACADEMIC APPOINTMENTS**

---

- 2017 - **ASSOCIATE PROFESSOR, POLITICAL SCIENCE**  
University of California, San Diego
- 2012 - 2017 **ASSISTANT PROFESSOR, POLITICAL SCIENCE**  
University of California, San Diego

**OTHER POSITIONS**

---

- 2013 - **DIRECTOR, INTERNATIONAL MIGRATION STUDIES PROGRAM MINOR**  
University of California, San Diego
- 2016 **ADVISOR, IMMIGRATION PORTFOLIO**  
**WHITE HOUSE INITIATIVE ON ASIAN AMERICANS AND PACIFIC ISLANDERS**

**EDUCATION**

---

- 2011 **PH.D. IN POLITICAL SCIENCE**  
University of California, Riverside  
Focus in Comparative Politics, International Relations, and Research Methods  
Dissertation: *Immigration Control in the Age of Migration*
- 2005 **B.A. IN POLITICAL SCIENCE**  
University of California, Riverside  
Focus in International Relations  
*Magna Cum Laude*

**BOOKS**

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- (2) Tom K. Wong. 2017. *The Politics of Immigration: Partisanship, Changing Demographics, and American National Identity*. Oxford University Press.  
[NPR](#), [ABC News/Yahoo.com](#), [LA Times](#), [Univision](#), [Monkey Cage](#)
- (1) Tom K. Wong. 2015. *Rights, Deportation, and Detention in the Age of Immigration Control*. Stanford University Press. [Oxford Law blog](#)

**JOURNAL ARTICLES**

---

- (7) Tom K. Wong, Angela Garcia, and Carolina Valdivia. 2018. "The Political Incorporation of Undocumented Youth," *Social Problems*.
- (6) Tom K. Wong and Hillary Kosnac. 2017. "Does the Legalization of Undocumented Immigrants in the US Encourage Unauthorized Immigration from Mexico? An Empirical Analysis of the Moral Hazard of Legalization," *International Migration* vol. 55 no. 2: 159-173.

- (5) Tom K. Wong and Angela Garcia. 2016. "Does Where I Live Affect Whether I Apply? The Contextual Determinants of Applying for Deferred Action for Childhood Arrivals (DACA)," *International Migration Review* vol. 50 no. 3: 699-727.  
[C-Span](#), [Associated Press](#)
- (4) Tom K. Wong, Donald Kerwin, Jeanne M. Atkinson, and Mary Meg McCarthy. 2014. "Paths to Lawful Immigration Status: Results and Implications from the PERSON Survey," *Journal of Migration and Human Security* vol. 2 no 4: 287-304.  
[NBC News.com](#)
- (3) Tom K. Wong. 2014. "The Politics of Interior Immigration Enforcement," *California Journal of Politics and Policy* vol. 6 no 3: 381-399.
- (2) Tom K. Wong and Justin Gest. 2013. "Organizing Disorder: Indexing Migrants' Rights and International Migration Policy," *Georgetown Immigration Law Journal* vol. 28 no 1: 257-269.
- (1) Tom K. Wong. 2012. "The Politics of Interior Immigration Control in the United States: Explaining Local Cooperation with Federal Immigration Authorities," *Journal of Ethnic and Migration Studies* vol. 38 no. 5: 737-756.

#### BOOK CHAPTERS

---

- (4) Tom K. Wong. 2014. "Conceptual Challenges and Contemporary Trends in Immigration Control." In *Controlling Immigration: A Global Perspective* (3<sup>rd</sup> edition), edited by James F. Hollifield, Philip Martin, and Pia Orrenius. Stanford University Press.
- (3) Tom K. Wong. 2014. "Nation of Immigrants or Deportation Nation? Analyzing Deportations and Returns in the United States, 1892-2010." In *The Nation and Its Peoples: Citizens, Denizens, and Migrants*, edited by John S.W. Park and Shannon Gleeson. Routledge.
- (2) James F. Hollifield and Tom K. Wong. 2014. "The Politics of International Migration: How Can We 'Bring the State Back In'?" In *Migration Theory: Talking Across Disciplines* (3<sup>rd</sup> edition), edited by Caroline B. Brettell and James F. Hollifield. Routledge.
- (1) Karthick Ramakrishnan and Tom K. Wong. 2010. "Partisanship, Not Spanish: Explaining Municipal Ordinances Affecting Undocumented Immigrants." In *Taking Local Control: Immigration Policy Activism in U.S. Cities and States*, edited by Monica W. Varsanyi. Stanford University Press.

#### WORKS UNDER REVIEW/IN PROGRESS (SELECTED LIST)

---

- Tom K. Wong and Justin Gest. "Looks Skin Deep: Do Immigrant Legislators Better Represent Immigrant Interests?"
- Tom K. Wong and Carolina Valdivia. "In Their Own Words: A Nationwide Survey of Undocumented Millennials," Working Paper 191, Center for Comparative Immigration Studies.  
[New York Times](#), [Washington Post](#), [The Hill](#), [La Opinión](#), [Univision](#), [NBC News.com](#)
- Tom K. Wong. "President Obama's Executive Actions on Immigration and the 2016 Presidential Election." This project uses a nationally representative survey of Latinos ( $n = 820$ ) and Asians ( $n = 950$ ) fielded in late to analyze how knowing someone who is undocumented and potentially eligible for legal

status via programs like DAPA affects the civic engagement of Latino and Asian citizens. The survey was fielded by GfK and commissioned w/Dan Hopkins and Efren Perez.

Tom K. Wong. “Mobilizing Low-Propensity Voters of Color” and “Governing Diversity.” These projects examine how demographic changes are reshaping the American electorate and how policymakers are responding. The former project includes multiple voter mobilization experiments utilizing direct voter contact run during the 2016 presidential cycle. These experiments analyze interventions designed to convey the urgency of voting to Latino, Asian, and immigrant-origin voters using political discourse around immigration policy and refugee admissions.

w/Justin Gest. “International Migrants Bill of Rights.” This project aims to create cross-national indicators on government respect for and recognition of the human rights of migrants. Funding from the World Bank (obtained by Gest) will be used to pilot a 58 item index across 5 countries.

## REPORTS

---

Tom K. Wong et al. 2017. *DACA Recipients’ Economic and Educational Gains Continue to Grow*. Washington, D.C.: Center for American Progress.

Tom K. Wong. 2017. *The Effects of Sanctuary Policies on Crime and the Economy*. Washington, D.C.: Center for American Progress.

Tom K. Wong et al. 2016. *New Study of DACA Beneficiaries Shows Positive Economic and Educational Outcomes*. Washington, D.C.: Center for American Progress.

Tom K. Wong et al. 2015. *Results from a Nationwide Survey of DACA Recipients Illustrate the Program’s Impact*. Washington, D.C.: Center for American Progress.

Tom K. Wong. 2014. *Statistical Analysis Shows that Violence, Not Deferred Action, Is Behind the Surge of Unaccompanied Children Crossing the Border*. Washington, D.C.: Center for American Progress.

Tom K. Wong et al. 2013. *Undocumented No More: A Nationwide Analysis of Deferred Action for Childhood Arrivals (DACA)*. Washington, D.C.: Center for American Progress.  
[C-Span](#), [Associated Press](#)

## OTHER PUBLICATIONS

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Tom K. Wong. 2017. “The Effects of Sanctuary Policies on Crime and the Economy,” *Migration and Citizenship: Newsletter of the American Political Science Association Organized Section on Migration and Citizenship* vol. 5 no. 2.

James F. Hollifield and Tom K. Wong. 2012/2013. “International Migration: Cause or Consequence of Political Change,” *Migration and Citizenship: Newsletter of the American Political Science Association Organized Section on Migration and Citizenship* vol. 1 no. 1.

Tom K. Wong. 2012. “The Commission on Wartime Relocation and Internment of Civilians.” In *The Encyclopedia of Transitional Justice*, edited by Lavina Stan and Nadya Nedelsky. Cambridge University Press.

Karthick Ramakrishnan, Dino Bozonelos, Louise Hendrickson, and Tom K. Wong. 2008. “Inland Gaps: Civic Inequalities in a High Growth Region,” *Policy Matters* vol 2 no 1.



Karthick Ramakrishnan and Tom K. Wong. 2007. "Immigration Policies Go Local: The Varying Responses of Local Governments to Undocumented Immigration." Chief Justice Earl Warren Institute on Race, Ethnicity, and Diversity. Working Paper Series on Immigration.

## RESEARCH GRANTS (AS A FACULTY MEMBER)

---

- \$341,127, Multiple Funders, "U.S. Immigration Policy in the 21<sup>st</sup> Century," 2017-2019
- \$22,500, UCSD USMEX Fellowship, 2016-2017
- \$16,000, UCLA Institute for Research on Labor and Employment, 2015-2016
- \$365,000, MacArthur Foundation, 2015-2017 (partially awarded, terminated after the DAPA program was enjoined by the Supreme Court)
- \$25,000, UCSD Frontiers of Innovation Scholars Program Grant, 2015-2016
- \$15,000, UCSD Faculty Career Development Program Grant, 2014-2015
- \$30,000, Unbound Philanthropy, 2014
- \$100,000, Department of Homeland Security, 2013
- \$30,000, Center for American Progress, 2013
- \$10,000, UCSD Center for International, Comparative, and Area Studies Grant, 2013
- \$10,000, UCSD Academic Senate, 2013
- \$1,500, UCSD Diversity, Equity, and Inclusion Grant, 2013

## TEACHING AT UCSD

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- Diversity, Equity, and Inclusion Teaching Award, 2014-2015
- The Politics of Immigration (upper-division, 280 students)
- International Human Rights Law: Rights of Migrants (upper-division, 200 students)
- The Politics of Multiculturalism (upper-division, 100 students)
- Immigration Politics and Policy (graduate seminar, 4 students)
- Undergraduate Honors Seminar (upper-division, 15 students)

## INVITED PRESENTATIONS (SELECTED)

---

- 2018 | "Surveying Undocumented Immigrants." UC Berkeley, June 12, 2018.
- "The Integration of DACA Recipients." Scripps College, May 3, 2018.
- "The Impact of the Trump Administration's Immigration Policies on Undocumented Immigrants: Evidence from Survey Experiments." Race, Ethnicity, and Politics Workshop, Northwestern University, April 13, 2018.
- "Immigrant Political Incorporation." UC Migration Conference, UCSD, March 2, 2018.
- "The Future of DACA." Columbia University, February 22, 2018.
- "Immigration and DACA in the Age of Uncertainty, Middlebury College, February 20, 2018.

- 2017** | “The Future of U.S. Immigration Policy in the Age of Trump.” Citizenship and Equality Colloquium, University of Colorado, November 16, 2017.
- “The Determinants and Effects of Sanctuary Policies.” Cornell University, November 9-10, 2017.
- “The Determinants and Effects of Sanctuary Policies.” Presentation at the 2017 APPAM Fall Research Conference, Chicago, IL, November 2-4, 2017.
- “Immigration and the U.S. Constitution.” Seminar at the Robert H. Smith Center for the Constitution at James Madison’s Montpelier, Orange, VA, July 31-August 2, 2017.
- “The Determinants of U.S. Immigration Policy.” University of California, Santa Barbara, June 1, 2017.
- “Paths to Legal Status for Undocumented Immigrants.” Presentation at the CLINIC annual conference, Atlanta, GA, May 25, 2017.
- “The Effects of Sanctuary Policies on Crime and the Economy.” Presentation at the Sanctuary Cities Convening, New York City Council, New York, NY, March 27-28, 2017.
- “The Future of U.S. Immigration Policy in the Age of Trump.” Yankelovich Center for Social Science Research, University of California, San Diego, March 15, 2017.
- “Child Migration.” World Migration Report workshop, International Organization for Migration (IOM) Geneva, Switzerland, March 9-10, 2017.
- “The Politics of Immigration.” American Academy of Arts and Sciences, San Diego Program Committee, University of California, San Diego, February 9, 2017.
- 2016** | “Post-Election Panel.” Center for Comparative Immigration Studies (CCIS), University of California, San Diego, November 21, 2016.
- “Mobilizing Immigrant Communities in the Age of Trump.” Tulane University, October 14, 2016.
- “Immigrant Integration and the Obama Administration: DACA, DAPA, and Implications for the 2016 Presidential Election.” Institute for Research on Labor and Employment, UCLA, April 28, 2016.
- “Mobilizing Low-Propensity Voters of Color: Towards an Electorate That Reflects a Changing America.” Presentation at the Asian Americans Advancing Justice conference, Los Angeles, CA, March 31, 2016.
- “Immigrants in American Society.” Presentation at KPBS, San Diego, CA, March 21, 2016.
- “Immigration Policy.” Presentation to Mi Familia Vota, Riverside, CA, January 14, 2016.
- 2015** | “The European Refugee Crisis.” Center for Comparative Immigration Studies (CCIS), the European Studies Program, the Lifelong Learning Program of the EU, and the Scholars Strategy Network (SSN), University of California, San Diego, October 27, 2015.

“U.S. Immigration Politics and the 2016 Presidential Election.” Presentation at the Wilson Center, Washington DC, October 26, 2015.

“The Political Incorporation of Undocumented Youth.” Presentation at the “Challenging Borders” conference, University of California, Riverside, October 23, 2015.

“The Consequences of Inequality: Why Does it Matter and How.” Symposium on Capital in the 21st Century with Thomas Piketty, University of California, San Diego, October 22, 2015.

“U.S. Immigration Politics and Policy.” Presentation at the U.S. Consulate in Tijuana, October 13, 2015.

“UC National Summit on Undocumented Students.” University of California Office of the President, May 7-8, 2015.

“Irregular Migration.” Presentation at the “Politics and Policies of International Migration: Europe and the U.S.” conference, Université Libre de Bruxelles, Belgium, April 28-29, 2015.

“Opportunities and Limits of the Executive Actions Proposed by President Obama.” Presentation at the Mexican Ministry of Foreign Affairs, Mexico City, Mexico, April 13-14, 2015.

“Administrative Relief Implementation and Impact Project.” Presentation at the Center for Migration Studies (CMS), New York, NY, March 25, 2015.

“Research Roundtable.” Presentation at the “Ready America: Implementing Immigration Action” conference, Washington DC, February 9-11, 2015.

**2014 |**

“Insights from Implementing DACA for Administrative Relief.” Presentation at the National Immigrant Integration Conference, Los Angeles, CA, December 16, 2014.

“Deferred Action for Childhood Arrivals.” American Immigration Council (AIC), Washington, D.C., November 7, 2014.

“Immigration Policy and the November 2014 Midterm Elections.” California Immigrant Policy Center (CIPC), October 29, 2014.

“The Many Paths to Legal Status: Results and Implications from the PERSON Survey.” Presentation to the Center for Migration Studies (CMS), New York, NY, September 29, 2014.

“The Congressional Politics of Interior Immigration Enforcement.” Presentation at the “Migration During Economic Downturns” workshop, German Historical Institute, Washington, DC, April 4-5, 2014.

“Mapping DACA Renewals.” Presentation to U.S. Citizenship and Immigration Services (USCIS), March 13, 2014.

“Latino Politics: Left, Right, or Down the Middle?” Presentation at the Hispanic Radio annual conference, San Diego, CA, March 10, 2014.

- 2013** | “Undocumented No More: A Nationwide Analysis of Deferred Action for Childhood Arrivals.” Center for Comparative Immigration Studies (CCIS), University of California, San Diego, October 2, 2013.
- “DACA Turns 1.” Presentation at the Center for American Progress, Washington, DC, August 15, 2013. **[Televised on CSPAN]**
- “The Prospects for Comprehensive Immigration Reform.” Presentation at the Mexican Ministry of Foreign Affairs, Mexico City, Mexico, August 12, 2013.
- “A Look at the Stats: How Will Congressional Representatives Vote on Comprehensive Immigration Reform?” Presentation at the “Changing Face of America” conference, University of California, Berkeley, May 3, 2013.
- “Will Comprehensive Immigration Reform Pass? Predicting Legislative Support and Opposition to CIR.” Center for Comparative Immigration Studies (CCIS), University of California, San Diego, April 29, 2013.
- “Race, Ethnicity, the 2012 Elections, and the Politics of Comprehensive Immigration Reform.” Presentation at the *Beyond the Headlines* speaker series, UCLA, February 26, 2013.
- “International Migrants Bill of Rights (IMBR) Initiative.” Georgetown Law School, Washington, DC, February 8-9, 2013.
- 2012** | “Immigration Policy After the 2012 Elections.” Center for the Study of International Migration, UCLA, November 16, 2012.
- “PBS Need to Know 2012 Election Special: America by the Numbers.” Presentation for KPBS at the Jo and Vi Jacobs Center, San Diego, CA, October 10, 2012.
- “Immigrants in American Society.” Presentation at the U.S. Citizenship and Immigration Services (USCIS) field office, Dallas, TX, March 6, 2012.
- 2011** | “The Radical Right and the Politics of Immigration Control in Europe.” University of Neuchâtel, Switzerland, June 16-17, 2011.
- “Conceptual Challenges and Contemporary Trends in Immigration Control.” Presentation at the “Immigration Policy in an Era of Globalization” conference at the Federal Reserve Bank of Dallas, TX, May 18-20, 2011.
- “Enforcing Like a State: A Mixed-Methods Study of the Politics of Immigration Control.” Presentation at the University of California Center for New Racial Studies conference, UCLA, April 21, 2011.
- “Immigration Enforcement in the Age of Obama.” Center for Ideas and Society, University of California, Riverside, March 8, 2011.
- 2010** | “The Politics and Determinants of Immigration Control: Evidence from 25 Immigrant-Receiving Democracies.” Department of Political Science and the Center for Research on Immigration, Population, and Public Policy, University of California, Irvine, December 1, 2010.

“States, Irregular Migrants, and a Theory of Selective Immigration Control: Evidence from European Gateway Cities.” Presentation at the “Beyond Arizona: Laws Targeting Immigrants in the US and Europe” conference at the Warren Institute on Race, Ethnicity, and Diversity, University of California, Berkeley, October 25, 2010.

2009 | “Immigration Control in Industrialized Democracies: What Explains Their Variations.” Presentation at Metropolis, an initiative of Citizenship and Immigration Canada, Ottawa, Canada, December 2, 2009.

## PROFESSIONAL ACTIVITIES

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- Reviewer: *American Journal of Political Science*, *American Politics Research*, *Du Bois Review*, *International Migration*, *International Migration Review*, *International Studies Quarterly*, *Journal of Ethnic & Migration Studies*, *Journal of Politics*, *Journal of Race, Ethnicity, and Politics*, *Law & Social Inquiry*, *National Science Foundation*, *Political Research Quarterly*, *Russell Sage Foundation*, *Social Identities*, *Social Problems*
- Advisory Board, Center for Comparative Immigration Studies (CCIS), 2012-present
- Advisory Board, Integrated Voter Engagement study, 2016-present
- Advisory Board, Unbound Philanthropy, 2015-2017
- APSA, Executive Committee, Migration and Citizenship Section, Treasurer, 2012-2015
- APSA, Migration and Citizenship Section Program Co-Chair, 2018
- Editorial Board, *Journal of Migration and Human Security* (JMHS), 2014-present
- Editorial Board, *Politics, Groups, and Identities* (PGI), 2016-present
- Executive Committee, Center for Comparative Immigration Studies (CCIS), 2015-present
- Member, California Census Complete Count Committee, 2018-present
- MPSA, International Relations and Domestic Politics Section Program Chair, 2016
- WPSA, (Im)Migration and Citizenship Section Program Chair, 2015, 2017
- WPSA, Dissertation award committee, 2016

# Exhibit 43

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5 **UNITED STATES DISTRICT COURT**  
6 **WESTERN DISTRICT OF WASHINGTON**

7 STATE OF WASHINGTON, STATE OF  
8 CALIFORNIA, et al.

9 Plaintiffs,

10 v.

11 THE UNITED STATES OF AMERICA,  
12 et al.,

Defendants.

NO. 2:18-CV-00939

DECLARATION OF MARK  
GREENBERG IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
EXPEDITED DISCOVERY

13 I, Mark Greenberg, declare as follows:

14 1. I am over the age of 18 and have personal knowledge of all the facts stated  
15 herein. I joined the Migration Policy Institute (MPI) as a Senior Fellow in July 2017. My work  
16 focuses on the intersections of migration policy with human services and social welfare  
17 policies. From 2009-17, I worked at the Administration for Children and Families (ACF) in the  
18 U.S. Department of Health and Human Services. I served as ACF Deputy Assistant Secretary  
19 for Policy from 2009-13; Acting Commissioner for the Administration for Children, Youth,  
20 and Families from 2013-15; and Acting Assistant Secretary from 2013-17. ACF includes the  
21 Office of Refugee Resettlement (ORR), which has responsibility for the refugee resettlement  
22 and unaccompanied children program. Previously, I was Executive Director of the Georgetown  
23 Center on Poverty, Inequality, and Public Policy, a joint initiative of the Georgetown Law  
24 Center and Georgetown Public Policy Institute. In addition, I was Executive Director of the  
25 Center for American Progress' Task Force on Poverty, and the Director of Policy for the  
26 Center for Law and Social Policy (CLASP). I am a graduate of Harvard College and Harvard

1 Law School. If called as a witness, I could and would testify competently to the matters set  
2 forth below.

3 2. MPI is an independent, nonpartisan, nonprofit think tank in Washington, DC  
4 dedicated to analysis of the movement of people worldwide. MPI provides analysis,  
5 development, and evaluation of migration and refugee policies at local, national, and  
6 international levels. It aims to meet the demand for pragmatic and thoughtful responses to the  
7 challenges and opportunities that large-scale migration, whether voluntary or forced, presents  
8 to communities and institutions in an increasingly integrated world.

9 3. During the time that I was Acting Assistant Secretary of the Administration for  
10 Children and Families (ACF), from October 2013-January 2017, I worked very closely with  
11 the Office of Refugee Resettlement (ORR) on many issues concerning the Unaccompanied  
12 Alien Children Program. I worked with both ORR leadership and staff on issues of program  
13 administration and policy development and met with ORR leadership on a weekly or biweekly  
14 basis and frequently talked or corresponded with program leadership or staff numerous times  
15 each day. To the best of my recollection, I visited the Border at least five times during this  
16 period, visiting shelters and talking with shelter staff, program staff, and children. In addition  
17 to visiting shelters in Texas, I also visited shelters in California and New York while at ACF. I  
18 frequently met with colleagues from Customs and Border Protection (CBP) and Immigration  
19 and Customs Enforcement (ICE) and other parts of the Department of Homeland Security,  
20 along with colleagues from the Department of Defense and other federal agencies on aspects of  
21 inter-agency coordination. I testified before Senate Committees or Subcommittees four times  
22 concerning the Unaccompanied Alien Children Program during my time as Acting Assistant  
23 Secretary.

24 4. Throughout my tenure as ACF Acting Assistant Secretary, it was always my  
25 understanding, and I repeatedly stated, that the Unaccompanied Alien Children Program at  
26



1 ORR was a program designed to provide shelter and services to children who arrived at the  
2 border unaccompanied by a parent or guardian. It is a program with detailed policies to  
3 address the circumstances and needs of children arriving unaccompanied. However, to my  
4 knowledge, the program has no policies or procedures to address the distinct needs and  
5 circumstances or reunification procedures for children who the U.S. government has separated  
6 from their parents, because that was not a purpose of the program before the Zero Tolerance  
7 policy was established.

8           5. In the ordinary operation of the Unaccompanied Alien Children Program,  
9 children who arrive at the border unaccompanied are apprehended by CBP and placed in CBP  
10 custody until they can be transported to a shelter of a grantee or contractor of the Office of  
11 Refugee Resettlement. When they arrive at an ORR shelter, they receive a medical screening  
12 and a set of services, including health, mental health, education, case management, recreation,  
13 legal screenings, access to religious observances, and other services in accordance with the  
14 requirements of the Flores v. Reno consent agreement. While at the shelter, efforts are made to  
15 determine if the child has a parent, relative or family friend – referred to as a sponsor - with  
16 whom the child can live while awaiting their immigration proceedings. In accordance with  
17 applicable law, efforts are made to place the child in the least restrictive setting in the best  
18 interest of the child, giving consideration to risk of danger to self or others and risk of flight.

19           6. The policies governing the sponsorship process have historically sought to  
20 strike an appropriate balance between the importance of ensuring that sponsor placements are  
21 safe and appropriate, and the need to help children move from a shelter to a parent, relative or  
22 family friend as rapidly as is prudent, in light of both requirements of the law and the  
23 recognition that the best interest of children is to be with their parent, and if that is not possible  
24 with a relative or if necessary a family friend who can care for them in a non-institutional  
25 setting.  
26

1           7.       Like millions of Americans, I was deeply concerned when I learned about the  
2 US Government policy of separating parents and children and sending the children to ORR  
3 custody. In addition, I was concerned about the use of ORR Unaccompanied Alien Children  
4 shelters for this purpose, because as the former Assistant Secretary, based on my experience, I  
5 believe that using the shelters to facilitate family separation is antithetical to the basic goals  
6 and mission of the program. In addition to causing pain for separated families and children, I  
7 believe this is likely to create highly stressful work environments for staff in shelters, insofar as  
8 they are being asked to perform a function that is virtually the opposite of their customary role  
9 of working to reunify children with parents, relatives, and family friends. Moreover, staff are  
10 being required to respond to the needs of young and in some instances very young children  
11 who are likely to be disconsolate because they do not know where their parent is and why their  
12 parent is not with them. I believe the stressful environment is likely to be detrimental to the  
13 basic operation of the shelters. The shelters are under additional pressures because of the large  
14 numbers of separated children referred to ORR custody within a short period of time.

15           8.       From multiple media accounts, it is my understanding that in many cases,  
16 parents do not know where their child is, and children do not know where their parent is. I am  
17 frankly baffled as to how such a situation has come to be. I do not know the details of the  
18 current internal planning process for the Office of Refugee Resettlement, but I do understand  
19 that when a child is referred to ORR by CBP, there is normally narrative information provided  
20 at that time concerning the circumstances of the child's apprehension. If this information  
21 included the statement that the parent and child were separated, it should then have been a  
22 straightforward matter for ORR to communicate back to CBP and ICE providing information  
23 about the location of the child.

24           9.       I have also seen multiple media accounts of difficulties parents are having  
25 communicating with their child. I am aware that under the ORR Policy Guide, available at  
26

1 [https://www.acf.hhs.gov/orr/resource/children-entering-the-united-states-unaccompanied-](https://www.acf.hhs.gov/orr/resource/children-entering-the-united-states-unaccompanied-section-3#3.3.10)  
2 [section-3#3.3.10](https://www.acf.hhs.gov/orr/resource/children-entering-the-united-states-unaccompanied-section-3#3.3.10), shelters must allow children a minimum of two ten minute calls a week to  
3 parents or other family members. That is a minimum, and I believe there is nothing in  
4 published ORR policy that would prevent allowing more contact.

5  
6 10. I am aware that under the joint DHS-HHS Policy Statement entitled Zero  
7 Tolerance Prosecution and Family Reunion, dated June 23, 2018, text indicates that parents  
8 seeking reunification may proceed to utilize the sponsorship process generally applicable to  
9 any prospective sponsor. I was troubled to read this because the ordinary sponsorship process  
10 seems highly inappropriate for parents who have recently been forcibly separated from their  
11 children.

12 11. The ordinary process for approving a sponsor for an unaccompanied alien child,  
13 is described in Section 2 of the ORR Policy Guide, available at  
14 [https://www.acf.hhs.gov/orr/resource/children-entering-the-united-states-unaccompanied-](https://www.acf.hhs.gov/orr/resource/children-entering-the-united-states-unaccompanied-section-2#2.1)  
15 [section-2#2.1](https://www.acf.hhs.gov/orr/resource/children-entering-the-united-states-unaccompanied-section-2#2.1). Under the Policy Guide requirements, a potential sponsor must submit an  
16 application, available at  
17 [https://www.acf.hhs.gov/sites/default/files/orr/frp\\_3\\_family\\_reunification\\_application\\_05\\_14\\_](https://www.acf.hhs.gov/sites/default/files/orr/frp_3_family_reunification_application_05_14_18.pdf)  
18 [18.pdf](https://www.acf.hhs.gov/sites/default/files/orr/frp_3_family_reunification_application_05_14_18.pdf), be subject to fingerprinting for herself and all adult household members, and then be  
19 subject to criminal records checks, immigration checks, and a sex abuse registry check. The  
20 approval process would also involve an assessment which would include making inquiries such  
21 as the sponsor's motivation for wanting to sponsor the child or youth; the sponsor's  
22 understanding of the unaccompanied alien child's needs, as identified by ORR and the care  
23 provider; the sponsor's plan to provide adequate care, supervision, access to community  
24 resources, and housing; and the sponsor's strengths, resources, and mitigating factors in  
25 relation to any risks or special concerns of the child. Assessment areas of inquiry are described  
26 in Section 2.4.1 of the Policy Guide, available at

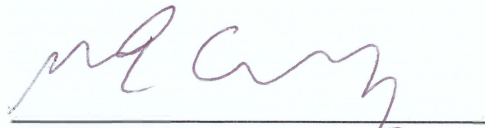
1 [https://www.acf.hhs.gov/orr/resource/children-entering-the-united-states-unaccompanied-](https://www.acf.hhs.gov/orr/resource/children-entering-the-united-states-unaccompanied-section-2#2.4.1)  
2 [section-2#2.4.1.](https://www.acf.hhs.gov/orr/resource/children-entering-the-united-states-unaccompanied-section-2#2.4.1)

3  
4 12. While such an inquiry may be appropriate for a relative, family friend or parent  
5 who has not resided with a child in many years, I believe it is wholly inappropriate for a child  
6 who has recently been forcibly separated from her parent by the US Government. Moreover,  
7 in my experience, it is a process that may take weeks or months to complete. Because the  
8 ORR Policy Guide is simply a statement of policy, not a promulgated rule, I am aware of no  
9 reason why ORR could not simply publish revised policy to provide for a streamlined and  
10 expedited reunification process.

11 13. Moreover, under ORR policy, [https://www.acf.hhs.gov/orr/resource/children-](https://www.acf.hhs.gov/orr/resource/children-entering-the-united-states-unaccompanied-section-2#2.8.2)  
12 [entering-the-united-states-unaccompanied-section-2#2.8.2](https://www.acf.hhs.gov/orr/resource/children-entering-the-united-states-unaccompanied-section-2#2.8.2), if a child is being released to a  
13 sponsor and the sponsor cannot come to the facility to receive the child, the sponsor must pay  
14 for the cost of transportation for the child, including the cost for a care provider escort if one is  
15 needed. During the Obama Administration in periods of significant spikes in numbers of  
16 unaccompanied children in ORR care, the Administration waived this requirement as a  
17 mechanism to speed up reunited unaccompanied children with the sponsors in the U.S. To my  
18 knowledge, the current Administration has not stated that this policy would be waived or  
19 modified for children in ORR care due to the family separation policy.

20 I declare under penalty of perjury under the laws of the State of California and the  
21 United States of America that the foregoing is true and correct.

22 Executed on this 29<sup>th</sup> day of June, 2018 in Washington, D.C.

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24   
25 Mark Greenberg  
26 Senior Fellow  
Migration Policy Institute

# Exhibit 44

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7 **UNITED STATES DISTRICT COURT**  
8 **WESTERN DISTRICT OF WASHINGTON**  
9 **AT SEATTLE**

10 STATE OF WASHINGTON, *et al.*,

11 Plaintiffs,

12 v.

13 DONALD TRUMP in his official capacity  
14 as President of the United States, *et al.*,

Defendants.

NO. 2:18-cv-00939 - MJP

DECLARATION OF  
LINDSAY LENNOX

15 I, Lindsay Lennox, declare as follows:

16 1. I am over the age of 18 and have personal knowledge of all the facts stated herein.

17 2. I am an attorney with the Northwest Immigrant Rights Project (NWIRP). I have  
18 been with NWIRP for almost three and a half years, and before I joined NWIRP I was a public  
19 defender for King County (King County Office of Public Defense/Northwest Defenders  
20 Division, formerly Northwest Defenders Association) for over eight years.

21 3. The majority of my current legal practice involves representing non-citizen  
22 children under the age of 21 in pending immigration proceedings. In the past 3 years and  
23 approximately 5 months, I have handled approximately 80 such cases. I have represented  
24 immigrant youth in counties in the State of Washington including King, Pierce, Thurston, Skagit,  
25 Mason, Whatcom, Kitsap, and Snohomish counties.

1           4.       My clients often reside with Washington sponsors. These sponsors are individual  
2 Washington residents and families who have taken responsibility for the care of my immigrant  
3 youth clients while they pursue their immigration cases. Unaccompanied children who are  
4 awaiting immigration proceedings (for example the adjudication of an asylum application, visa  
5 approval or adjustment of status), are entitled to access many state-funded programs. For  
6 example, my clients use Washington courts. Many of my clients are eligible to apply for Special  
7 Immigrant Juvenile Status (SIJS). The federal immigration system relies on the expertise of state  
8 courts in making determinations regarding a child's welfare for purposes of entering the  
9 predicate findings for SIJS. Thus, SIJS-eligible children may seek SIJS predicate findings from  
10 a state's juvenile court, where the judge determines whether the child qualifies for protection  
11 under state child welfare laws. Under statutes and regulations promulgated by the federal  
12 government, my clients *must* obtain an order from state court with these predicate findings before  
13 they can pursue that form of congressionally authorized immigration relief.

14           5.       Clients I have represented have accessed state courts in counties including King,  
15 Pierce, Skagit, Kitsap, Snohomish, Mason, and Whatcom. It is my experience that in some  
16 counties, probation officers must first determine that a dependency petition is reasonably  
17 justifiable before the petition may be filed. It is also my experience that Guardians Ad Litem  
18 (GALs) are sometimes appointed by the court to appear in dependency cases. Also, in  
19 dependency cases, parents are appointed a public defender to represent them. My understanding  
20 is that the appearance of GALs and public defenders in the cases relating to immigrant youth are  
21 funded with state resources, as are the court facilities and personnel.

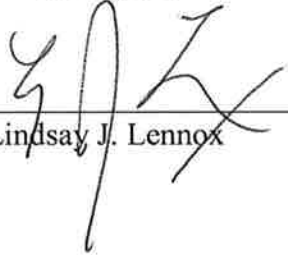
22           6.       My clients are often eligible for Medicaid through the Apple Health program. My  
23 clients often receive medical and mental health care coverage through the State of Washington,  
24 and I often encourage them to apply for Medicaid if they are eligible and not otherwise receiving  
25 care.

1           6.     My clients are often eligible for Medicaid through the Apple Health program.  
2 My clients often receive medical and mental health care coverage through the State of  
3 Washington, and I often encourage them to apply for Medicaid if they are eligible and not  
4 otherwise receiving care.

5           7.     My clients go to Washington State public schools. For example, my clients  
6 have attended schools in the Seattle Public Schools System as well as in the Highline School  
7 District. Depending on their individual needs, my clients may access additional state education  
8 services, such as ESL programs, special education, mental health services, and other programs  
9 delivered within the school district. It is my understanding that such programs are funded in  
10 part through local levy funds and state dollars.

11           I declare under penalty of perjury under the laws of the State of Washington and the  
12 United States of America that the foregoing is true and correct.

13           DATED this 2<sup>nd</sup> day of July, 2018 at Seattle, Washington.

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17 Lindsay J. Lennox  
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# Exhibit 45

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7 **UNITED STATES DISTRICT COURT**  
8 **WESTERN DISTRICT OF WASHINGTON**

9 STATE OF WASHINGTON,  
10  
11 Plaintiff,

NO. 2:18-cv-00939-RAJ

DECLARATION OF JONI KIMOTO

12 v.

13 DONALD TRUMP in his official  
14 capacity as President of the United  
States, et al.,

Defendants.

15 I, Joni Kimoto, declare as follows:

16 1. I am over the age of 18 and have personal knowledge of all the facts stated  
17 herein.

18 2. I was born in Portland, Oregon on November 19, 1938. I have lived in the  
19 United States my entire life, and I have lived in Portland for the past 54 years. My  
20 grandparents immigrated to this county in the early 1900s to seek a better life, and they settled  
21 in Portland. My mother was born in Portland, and my father was born in Seattle.

22 3. I was 3 years old when World War II started. In January 1942, the government  
23 imposed curfews and travel bans on Japanese Americans, including my family. The FBI came  
24 to my home and interrogated me and my parents. One FBI agent asked me whether there were  
25 any guns in the home. I responded that there were, and showed him two toy pistols. The FBI  
26

1 seized my father's camera, binoculars, and radio because they believed them to be evidence  
2 that my family posed a threat to national security.

3 4. In the spring of 1942, my parents were given 10 days to sell their store and pack  
4 all of our belongings into three suitcases. We were first taken to the Portland Livestock  
5 Exhibition Center, renamed Portland Assembly Center, and housed where animals were  
6 previously exhibited and slept on hay mattresses. To this day, I still remember the smell of  
7 feces, hay, and livestock.

8 5. In the Fall of 1942, we were put on trains. The curtains on the trains were shut  
9 so that we could not see where we were being taken. When we arrived, we were greeted by the  
10 military, who escorted us into an encampment with uninsulated barracks. I distinctly  
11 remember being surrounded by barbed wire and sentries with guns, and my mother warning me  
12 not to get close to the wires because it was not safe.

13 6. During the summer of 1944, we were photographed and fingerprinted like  
14 criminals. Only after that were we issued indefinite release cards that allowed us to travel  
15 outside of the encampment. My family left on July 9, 1944. I still have a copy of my release  
16 card, which has my photograph and fingerprint.

17 7. The policy of separating children from their parents at the border has resonated  
18 with me on a deeply personal level, even more so since I understand that fathers are being  
19 detained in my home state of Oregon and there may even be children here separated from their  
20 parents. It reminds me of my experiences of being taken from my home and put in an  
21 incarceration camp, causing me to experience psychological distress. In both situations, the  
22 government is imprisoning people without due process. The only difference is that, in my  
23 situation, I had my parents to comfort me. I can only imagine the trauma these children must  
24 be experiencing upon separation from their parents. It is heart breaking and frightening to  
25 think about.  
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8. I understand that now the federal government is planning to detain people in military camps, just as my family and I were imprisoned in camps that were guarded by the army. It makes me wonder, how is it possible that we did not learn from what we did to Japanese Americans in World War II? I feel a lot of despair because it is happening again.

I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

DATED this 26 day of June, 2018 at Portland, Oregon.

  
\_\_\_\_\_  
Joni Kimoto

# Exhibit 46

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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON,

Plaintiff,

v.

DONALD TRUMP in his official  
capacity as President of the United  
States, et al.,

Defendants.

NO. 2:18-cv-00939-RAJ

DECLARATION OF EVELYN  
BANKO

I, Evelyn Banko, declare as follows:

1. I am over the age of 18 and have personal knowledge of all the facts stated herein.

2. As an Oregon resident, survivor of the Nazi Holocaust, and former child refugee, I provide this declaration to explain how the federal government's family-separation policy affects me and other people in Oregon who survived the Holocaust.

3. I was born in Vienna, Austria, in January 1936. My mother at that time was a housewife and my father was a trained engineer who owned an auto-part import business.

4. One day in the spring of 1938, my father received a tip that he should not go home that night, because the Nazis had recently invaded Austria and were entering neighborhoods to round up and deport Jews.

1           5.       My parents were forced to liquidate their business and make plans to flee the  
2 country. Because we did not have an "affidavit of support" from an American citizen, we were  
3 unable to travel immediately to the United States.

4           6.       Although we were in fact refugees, we were forced to use a tourist visa in order  
5 to flee the country. We traveled to Riga, Latvia, as if on vacation. We stayed there for two  
6 years while my parents learned new job skills in order to support our family.

7           7.       Many of my relatives were not able to escape the Nazis. For example, in the  
8 early 1940s, my mother's younger brother fled to Vichy France, but he was detained there in a  
9 concentration camp. He was sent from there to Auschwitz and then to Buchenwald, where he  
10 died. My father's sister, her husband, and several of my cousins fled to Yugoslavia, but they  
11 were detained and sent to Jasenovac, where they died. My grandparents fled to  
12 Czechoslovakia, but they were deported from there to a concentration camp in Poland, where  
13 they died.

14          8.       My family ultimately obtained the necessary documentation to leave Latvia in  
15 1939, via one of the Nordic states. However, the Nazis bombed Norway and the sea was full  
16 of German U-Boats, so we were unable to leave.

17          9.       Later in 1939, my family attempted again to flee Latvia, this time through Italy.  
18 But by then, the United Kingdom had declared war on Germany, and Italy was allied with  
19 Germany, so we were unable to travel through Italy.

20          10.      By 1940, the Russians had occupied Latvia. For whatever reason, the Russian  
21 authorities allowed my family to leave.

22          11.      In September of 1940, we boarded a train and traveled across the trans-siberian  
23 railway to Manchuria—a journey that took many weeks. From Manchuria, we traveled to  
24 Japan.  
25  
26

1           12.     About a month after fleeing Latvia, we were able to travel by sea to Seattle.  
2 The voyage was very rough. We were stuck in the bottom of the boat, sailed through a  
3 typhoon, and I contracted whooping cough. I spent much of the trip bedridden, calling out for  
4 my father.

5           13.     Our first stop in North America after crossing the Pacific Ocean was in  
6 Vancouver, British Columbia. We were unable to leave the ship though because the United  
7 Kingdom was at war with Germany and we had German passports.

8           14.     We finally landed in Seattle on September 24, 1940. However, we were told  
9 that we could not stay in Seattle because the city's "quota" for Jewish immigrants was "full."

10          15.     Fortunately, we were given the options of traveling to Portland or San  
11 Francisco. My parents decided that we should settle in Portland because it was a smaller city  
12 and they thought that they could have more luck finding employment. They also loved the  
13 mountains in the Pacific Northwest, which reminded them of our native Austria.

14          16.     We settled in Portland as planned, where my mother got a job sewing sports  
15 clothes. My father began working 14 to 16-hour days at a service station, six days per week, to  
16 support our family.

17          17.     I then grew up in Portland like any American child, attending preschool,  
18 elementary school, and then high school. I went to college at the University of Oregon and  
19 became a teacher. I later obtained my Masters in Education at Lewis and Clark College.

20          18.     I was a teacher in the Portland-area for 33 years. After I retired from teaching, I  
21 began volunteering my time to speak about my experiences in World War II. I have been  
22 speaking about those experiences for 25 years now, often at organizations such as the Oregon  
23 Jewish Museum & Center for Holocaust Education in Portland.



1           19.     As a survivor of the Holocaust and former child refugee, I find the actions of the  
2 federal government—in particular, the policy of separating children from their parents at the  
3 border—to be very frightening.

4           20.     The federal government’s family-separation policy, especially when viewed in  
5 combination with President Trump’s hateful rhetoric about immigrants, reminds me of what  
6 was happening in Europe when I was a child.

7           21.     I grew up thinking of America as a welcoming country. I believed in the words  
8 inscribed on the Statue of Liberty. But now I ask myself, what sort of country separates  
9 children from their parents? The policy is heartless, cruel, and undemocratic.

10          22.     The separation policy is particularly distressing to me as a Holocaust survivor  
11 because I have personally known many survivors who were separated from their parents by the  
12 Nazis, never to see their parents again.

13          23.     Even if parents and children are eventually reunited, I know, as a Holocaust  
14 survivor, that the pain of separation can be life-long. For example, I have learned of one  
15 survivor who was forced to give up her very young child to another woman when the Nazis  
16 were advancing. Although the woman and her child were reunited after the war, the child did  
17 not remember the mother, and did not want to go with her. There was always a disconnect  
18 between them after that. The damage had been done and could not be repaired.

19          24.     The things I see in the news remind me of such painful stories. For example,  
20 another Portland-area survivor named Miriam Greenstein—who only recently passed away—  
21 was separated from her family at Auschwitz and never saw her parents again. She was able to  
22 settle in the United States after the war because she happened to have memorized the telephone  
23 number of an American relative. I heard on the news recently about a child who was separated  
24 from her family at the border, but who also had memorized the telephone number of a relative.  
25 When I hear stories such as these, the parallels between what the federal government is doing  
26 and what the Nazis did to children become impossible to ignore.

1           25.     The policy also makes me very distressed when I hear President Trump  
2 describe immigrants as “criminals.” This sort of rhetoric is ridiculous. Because of my own  
3 experience fleeing the Nazis, I know what it takes for a family to make the long and difficult  
4 journey to escape persecution and violence. The people at the border are coming here to seek  
5 asylum. They are not criminals but refugees—just like I was. The idea that a family would go  
6 through something so difficult just to come here and commit crimes is absurd, and reeks of the  
7 propaganda employed by the Nazi regime.

8           26.     The profound distress that I feel these days is not unique to me. I grew up in a  
9 community of Jewish refugees here in Portland. Among those who are still alive today, such  
10 fear, pain, and disbelief are widespread.

11          27.     We Holocaust survivors feel this pain because we see the similarities between  
12 what is happening now and what was happening in the early stages of Nazi Germany, with the  
13 passage of the Nuremberg Laws in the 1930s.

14          28.     I know that prejudice always exists, in some people, under the surface. But the  
15 Trump Administration is making it okay to hate again. And that is what is so frightening to  
16 me.

17          29.     The actions of the Trump Administration—including the family-separation  
18 policy—have given people permission to hate openly. Spontaneous expressions of hatred have  
19 become accepted. At best, the Administration tolerates such expressions. At worst, the  
20 Administration actively encourages them. And the people are beginning to tolerate or  
21 encourage such hatred, as well. I know all too well that this is how it starts—the normalization  
22 of hatred and brutality.

23          30.     Frankly, it is hard for me to see a significant difference between the actions of  
24 the Administration and the early actions of the Nazis—to say nothing of the parallels between  
25 the federal government’s family-separation policy and the separation of children from their  
26 parents in the Nazi death camps.



# Exhibit 47

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7 **UNITED STATES DISTRICT COURT**  
8 **WESTERN DISTRICT OF WASHINGTON**

9 STATE OF WASHINGTON,

10 Plaintiff,

11 v.

12 DONALD TRUMP in his official  
13 capacity as President of the United  
14 States, et al.,

Defendants.

NO. 2:18-cv-00939-RAJ

DECLARATION OF JUDY  
MARGLES

15 I, Judy Margles, declare as follows:

16 1. I am over the age of 18 and have personal knowledge of the facts stated herein.

17 2. I am the Director of the Oregon Jewish Museum and Center for Holocaust  
18 Education (OJMCHE), a non-profit museum and educational institution in Portland, Oregon.  
19 In that capacity, I manage the exhibitions, educational resources, public programs, finances,  
20 and the archives and collections of the museum. I also have a Master's Degree in history and a  
21 graduate certificate in museum studies from New York University.

22 3. The mission of OJMCHE is to explore the legacy of the Jewish experience in  
23 Oregon and to teach the universal lessons of the Holocaust. Through exhibitions, programs,  
24 educational resources, and opportunities for intercultural conversation, OJMCHE challenges its  
25 visitors to resist indifference and discrimination and to envision a just and inclusive world.  
26

1           4.       As stewards of the Oregon Holocaust Memorial in Portland's Washington Park,  
2 OJMCHE also brings thousands of school children to both the Memorial and to the Museum.  
3 We believe that the Holocaust provides one of the most effective subjects for examining basic  
4 moral concerns, because it simultaneously addresses universal issues of intolerance and the  
5 dangers of denying diversity. For many young Oregonians, an OJMCHE program has been  
6 their first encounter with the history of the Holocaust.

7           5.       The Nazi practice of separating children from their parents at concentration  
8 camps—or, perhaps most infamously, at extermination camps such as Auschwitz—is painfully  
9 well-known to history and requires little elaboration here. The practice resulted in the  
10 separation of many thousands of families during the war, many of whom were never reunited.

11          6.       OJMCHE and its predecessor institutions have worked closely with many  
12 Holocaust survivors in Oregon. For example, it is common for children on school trips to visit  
13 the Museum, specific exhibitions, the Memorial, or public workshops in our auditorium.  
14 Indeed, approximately 12,000 such students have visited our facilities this year alone. When  
15 the children arrive, they are greeted by a docent—often a Holocaust survivor or a descendent  
16 of a survivor.

17          7.       OJMCHE also maintains a Holocaust Speakers Bureau. Through this bureau,  
18 we send Holocaust survivors or survivor-descendants to schools throughout the Pacific  
19 Northwest region, to speak about their stories.

20          8.       I have personally known and worked with many survivors through my work at  
21 OJMCHE.

1           9.       As far back as the 2016 presidential campaign, people were making  
2 comparisons in the news and other avenues of public discourse between the rhetoric employed  
3 by then-candidate Trump and that employed by Nazi Germany. Although we recognized the  
4 parallels, we actually resisted the comparison quite strongly and for quite some time. In part,  
5 we were aware that comparisons to Nazi Germany are likely to be dismissed out of hand as  
6 hyperbolic or offensive.

7           10.      That said, from my perspective as Director of OJMCHS, we are witnessing the  
8 federal government adopt and pursue a policy of slow dehumanization of others that has  
9 chilling parallels to the early years of the Nazi regime. In fact, between 1933 and 1945, the  
10 Nazis enacted approximately 450 laws intended to dehumanize Jews.

11          11.      Similarly, I see the Administration pursuing practices and policies and using  
12 language aimed at dehumanizing people. The separation of children from their families is  
13 dehumanizing. The President and his Administration's rhetoric about immigrants is  
14 dehumanizing. To be clear, it is not my intent to appear to be predicting some form of  
15 genocide in America. However, as Director of an institution dedicated to historical memory, I  
16 believe we must learn from history so as not to repeat it. This requires us to work against the  
17 ways in which oppression manifests, even in its earliest forms.

18          12.      The parallels that I perceive, and the distress that I feel personally as a result of  
19 those parallels, is shared among the Holocaust survivor and survivor-descendant community in  
20 Oregon. There is a pervasive sense of despair and a profound anxiety in our community.

21          13.      Particularly among survivors who were separated from their parents in the  
22 camps, there is much grief and heartache. Such survivors have never forgotten, and, in my  
23 experience, have never truly healed from the experience of family separation despite the  
24 decades that have passed.

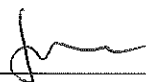
1           14.       Such survivors who learn of children separated from their parents at our  
2 Southwestern border are sickened by what they are seeing. They understand that the pain and  
3 terror felt by these children is the same pain and terror that they felt during World War II. This  
4 causes them profound stress and anxiety.

5           15.       In one recent discussion with a survivor who was separated from her family in  
6 the camps, the survivor referred to the federal government's family-separation policy as an  
7 "awful inhumanity" and "like a repetition of history." This survivor was seven years old when  
8 she was separated from her mother. Even though she was one of the lucky ones who was  
9 reunited with her mother after the war, she has never forgotten what it was like to have been  
10 separated from her mother and she is grief-stricken when she thinks about what the federal  
11 government is doing. She maintains that the suffering and anxiety that she endured as a child  
12 has never left her—indeed, that is what she tells people when they ask her how it is that she  
13 can remember something that happened to her when she was only seven. Her husband, who  
14 was 15 years old when he was separated from his mother in the camps, was not one of the  
15 lucky ones; he never saw his mother again. This couple has been discussing the family-  
16 separation policy in recent days and the experience for them is very painful.

17           16.       I feel an urgent necessity to speak out, to prevent the repetition of history, and it  
18 is in that spirit that I provide this declaration to the Court.

19           **I declare under penalty of perjury under the laws of the States of Oregon and**  
20 **Washington and the United States of America that the foregoing is true and correct.**

21           DATED this 28 day of June, 2018 at Portland, Oregon.

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25 \_\_\_\_\_  
26 Judy Margles



# Exhibit 48

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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON,  
Plaintiff,

v.

DONALD TRUMP in his official  
capacity as President of the United States,  
et al.,  
Defendants.

NO.

DECLARATION OF LAURA  
BRIGGS IN SUPPORT OF THE  
STATE OF WASHINGTON

I, Laura Briggs, declare as follows:


1. I am over the age of 18 and have personal knowledge of all the facts stated herein.
2. I am a professor and chair of Women, Gender, Sexuality Studies at the University of Massachusetts. I hold a Ph.D. in American Civilization from Brown University. My curriculum vitae, a true and correct copy of which is attached as Exhibit A, further details my qualifications and lists all of the publications I have authored in the previous 10 years.
3. A true, correct, and complete statement of my opinions, the bases and reasons for them, and the facts and data I considered in forming them is attached as Exhibit B.

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4. I am being paid \$1,000 for my study and testimony in this case.

I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

DATED this \_\_19\_\_ day of June, 2018 at Northampton, Massachusetts, United States.

  
\_\_\_\_\_  
LAURA BRIGGS

## Exhibit A: Briggs CV

**LAURA BRIGGS**  
Chair and Professor  
Department of Women, Gender, Sexuality Studies  
University of Massachusetts Amherst  
208 Bartlett Hall  
130 Hicks Way  
Amherst, MA 01003  
413.545.5330

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### **Education**

Brown University, Ph.D., American Civilization, 1998.  
Harvard University, M.T.S., Theology and Secondary Education, 1989.  
Mount Holyoke College, A.B., Women's Studies, 1986

### **Employment**

Chair and Professor, Department of Women, Gender, Sexuality Studies, University of Massachusetts Amherst, August 2011-present.  
Associate Dean, Social and Behavioral Sciences, University of Arizona, March 2010-July 2011.  
Head, Department of Gender and Women's Studies, University of Arizona, 2006-07, 2008-2010  
Women's Studies and Anthropology, University of Arizona, 1997-2011.

### **Honors, Awards, Fellowships**

Nominee, Distinguished Teaching Award, 2016s  
James A. Rawley Prize for Best Book in the History of US Race Relations, Organization of American Historians, 2013.  
Inter-American Foundation Award for travel to Mexico,  
UA Magellan Circle Faculty Award for Research, 2009.  
UA Magellan Circle Award for Excellence in Graduate Teaching, 2009.  
Comparative Ethnic Studies Prize, American Studies Association, 2007.  
Tanner Humanities Center Fellow, University of Utah 2007-08.  
University of Michigan Eisenberg Institute for Historical Studies Fellow, Oct.-Nov., 2007.  
UA Social and Behavioral Sciences Research Institute Professorship, 2007 (declined).  
UA SBSRI Research Professorship, Spring 2004.  
AACU Science Education for New Civic Engagements and Responsibilities Model Course, 2002  
Constance A. Rourke Prize, American Studies Association, 2002.  
Harvard University, Warren Center Fellowship, Fall 1999.

## Publications/Creative Activity

### Scholarly Books and Monographs

*How All Politics Became Reproductive Politics: From Welfare Reform to Foreclosure to Trump* (Berkeley: University of California Press, 2017).

*Somebody's Children: The Politics of Transnational and Transracial Adoption.* (Durham: Duke University Press, 2012).

Diana Marre and Laura Briggs, eds. *International Adoption: Global Inequalities and the Circulation of Children* (New York: NYU Press, 2009).

*Reproducing Empire: Race, Sex, Science and U.S. Imperialism in Puerto Rico* (University of California Press, American Crossroads Series, December 2002).

### Journal Articles

"Adoption, from Private to Public: Intimate Economies," *Adoption and Culture* 6:1 (2018). Special Issue: Critical Adoption Studies.

"Central American Child Migration: Militarization and Tourism," Special Issue on Militarism and Tourism *American Quarterly* 68:3 (September 2016): 573-582.

"Imperialism as a Way of Life: Thinking Sex and Gender in American Empire," *Radical History Review* Special Issue: Sexing Empire 123 (October 2015).

with Maylei Blackwell and Minnie Chiu, "Roundtable: Transnational Feminism," in *Frontiers* 36:3 (Spring 2015): 1-24.

"Making Race, Making Sex: Theorizing Torture" *International Feminist Journal of Politics* 16:1 (2014): 1-20.

"Wither Women's Studies in the Current Crisis in Higher Education?" *Feminist Studies* 39:2 (2013): 1-5.

With Faye Ginsburg, Elena Gutiérrez, Rosalind Petchesky, Rayna Rapp, Andrea Smith, and Chikako Takeshita, "Roundtable: Reproductive Technologies and Reproductive Justice," *Frontiers* 34:3 (December 2013): 102-25.

"Biopolitics of Adoption," *Scholar and the Feminist Online* 11:3 (Summer 2013).  
<http://sfoonline.barnard.edu/life-un-ltd-feminism-bioscience-race/>

"Notes from Antigua Naval Base," *American Quarterly* 65:2 (June 2013): 303-08.

Briggs and Karen Dubinsky, "The Politics of History and the History of Politics." In *American Indian Quarterly* Special issue: Native Adoption in Canada, the United States, New Zealand, and Australia 37: 2 (Spring 2013): 129-35.

"La economía política de la adopción: La neoliberalización del bienestar infantil," *Scripta Nova* special issue: *El principio del 'interés superior' de niñez: Adopción, políticas de acogimiento y otras intervenciones. Perspectivas espaciales y disciplinares comparativas.* 16 (Spring 2012).

"Feminism and Transnational Adoption: Politics, Precarity, and the Politics of Raising (Other People's?) Children." *Feminist Theory* 13.1 (April 2012): 81-100.

"Reproductive Technology: Of Labor and Markets" *Feminist Studies* 36:2 (Summer 2010): 359-374.

"Somebody's Children," *Utah Law Review* 2 (Fall 2009): 421-454.

"Adoption, Immigration, and Privatization: Transnational Transformations in Family,"

S&F Online 7.3 (Summer 2009):

[http://www.barnard.edu/sfonline/sexecon/briggs\\_01.htm](http://www.barnard.edu/sfonline/sexecon/briggs_01.htm)

“Activisms and Epistemologies,” *Social Text* 26:4 97 (Winter 2008): 79-95.  
(with J.T. Way and Gladys McCormick), “Transnationalism: A Category of Analysis,”  
*American Quarterly* 60:3 (September 2008): 625-648. (Entire issue won the 2009  
award for Best Special Issue from the Council of Editors of Learned Journals).  
Reprinted in David Gutierrez and Pierrette Hondagneu-Sotelo, eds. *Nation and  
Migration* (Baltimore: Johns Hopkins University Press, 2009).

### **Book Chapters Presenting Original Research**

“Foreign and Domestic: Adoption, Neoliberalism, Immigration” in Eileen Boris and  
Rhacel Salazar Parreñas, eds. *Intimate Labors: Cultures, Technologies, and the  
Politics of Care* (Stanford University Press, 2010): 49-62.  
“The Pill” in Puerto Rico and the Mainland United States: Negotiating Discourses of Risk  
and Decolonization,” in Lori Reed and Paula Saukko, eds. *Governing the Female  
Body* (SUNY Press, 2010): 159-185  
“Becoming Welfare Island: Reforming Children in the Puerto Rican 1970s,” in Anita  
Casavantes Bradford and James Schrader, eds. *Little Nations: Childhood, Family, and the State  
in Cold War Latin America* (accepted).  
“Reproductive Politics,” in Christopher Nichols, Andrew Preston, Elizabeth Borgwardt, eds.,  
*Rethinking Grand Strategy* (New York: Oxford University Press, accepted).

### **Book Chapters Reviewing the State of the Field**

“Transnational” *Oxford Handbook of Feminist Theory*, ed. Mary Hawkesworth and Jane  
Disch. (New York: Oxford University Press, 2016), pp. 999-1009.  
“State of the Field: Gender and U.S. Imperialism,” in Vicki Ruiz, Eileen Boris, Jay  
Kleinberg, eds. *The Practice of U.S. Women's History: Narratives, Intersections, and Dialogues*.  
(Rutgers, 2007): 146-160.

### **Book Reviews and Short Articles**

Amrita Pande, *Wombs in Labor*; Sharmilla Rudrappa, *Discounted Life*; Marcia Inhorn, *Cosmopolitan  
Conceptions*. In *Signs: Journal of Women in Culture and Society* 42:4 (Summer 2017): 1042-  
1047.  
Kathryn Joyce, *The Child Catchers*. In *Ms. Magazine* (Spring 2013).  
Margaret Ward, *Missing Mila, Finding Family: An International Adoption in the Shadow  
of the Salvadoran Civil War*. In *Hispanic American Historical Review* 93:1  
(February 2013): 151-53.  
Karen Dubinsky, *Babies Without Borders: Adoption and Migration across the Americas*  
for *Canadian Journal of Ethnic Studies* 43:1 (2011): 289-92.  
Michele Bratcher Goodwin, *Baby Markets*, for *International Journal of Sociology of the  
Family* 37: 1 (Spring 2011): 173-175.  
Of Lesbians and Technosperm, *Queering Reproduction* by Laura Mamo, *GLQ: A  
Journal of Lesbian and Gay Studies* 15.2 (2009): 335-337.

Adoption History (web site) by Ellen Herman. *Journal of American History* (March 2008): 5.

## **Invited Seminars, Colloquia, Lectures**

### International

Seminar on *How All Politics Became Reproductive Politics: From Welfare Reform to Foreclosure to Trump*, Reproductive Sociology Research Group, Cambridge University, September 26, 2017.

“Gender and North America” Gendering Modern World History, Jesus College, Cambridge University, September 27-30.

Keynote, “The Intimate Politics of Race and Globalization: Transracial and Transnational Adoption in the United States.” *Designing Modern Families: International Perspectives on Intercountry and Transracial Adoptions*. November 17-18, 2017, Universität Kassel, Kassel, Germany.

Keynote, “Where Did Trump Come From? Reproduction, Whiteness, and Neoliberalism,” for *Reproductive Politics from the Welfare Reform to the Trump Era*, November 16, 2017, Adopción, Familias, Infancias Research group, Universitat Autònoma de Barcelona, Barcelona, Spain.

Transborder Reproductive Surrogacy and Adoption, International Forum on Inter-Country Adoption and Global Surrogacy, 11-13 August 2014, The Hague, The Netherlands. Published at <http://repub.eur.nl/res/col/9760/>

Human Rights, the Hague Convention, and Guatemala. *Encontro circulação de crianças*, Universidade do Estado do Rio de Janeiro, June 11-13, 2009.

Keynote, “Making Race, Making Sex: Theorizing Science in a Moment of Torture, War, and (Re)Productive Uncertainty,” BIOSEX conference, Department of Philosophy, Université Paris Sorbonne, May 29, 2009.

### National

Where Did Trump Come From? Reproductive Politics, Whiteness, and Neoliberalism, April 12, 2018, University of Southern California, Department of American Studies.

Where Did Trump Come From? Reproductive Politics, Whiteness, and Neoliberalism, History Department, April 10, 2018, Pomona College.

Gay Family Values, Vern and Bonnie Bullough Distinguished Lecture, History Department, University of Utah, March 2018.

Where Did Trump Come From? Reproductive Politics, Whiteness, and Neoliberalism. WGSS, UConn Stamford. February 28, 2018.

Where Did Trump Come From? Reproductive Politics, Whiteness, and Neoliberalism, Women and Gender Studies, Distinguished lecture, Gender and Women’s Studies, UT/Austin, February 8-11, 2018.

Where Did Trump Come From? Reproductive Politics, Whiteness, and Neoliberalism, Brown University, Center for the Study of Race and Ethnicity, December 14, 2017.

Organizer, Critical Transnational Feminisms Seminar, Institute for Research on Women and Gender, University of Michigan, March 2017.

“Fertility, Infertility, Race: Of ARTs and Infant Mortality,” Yale History of Medicine,

February 20, 2017.

“All Politics are Reproductive Politics,” Keynote, Annual Roe v. Wade Dinner, University of Vermont Law School, April 15, 2016.

Roundtable participant, “Transnationalism,” Transnational Feminisms Summer Institute, Ohio State University, July 7-14, 2014.

“Transnational and Transracial Adoption: The Intimate Politics of Race and Empire.” NYU, Social and Critical Analysis, April 3, 2014.

“From Baby Veronica to CHIFF: Questions of Power, Race, and Justice in Transracial and Transnational Adoption,” Keynote at Adoption and Culture Conference, Tallahassee, FL, March 27-30, 2014.

“Imperialism as a Way of Life,” Keynote at American Empire conference, Notre Dame, South Bend, IN, March 21-22.

Keynote at Sleeping Giants in Adoption: Power, Privilege, Class Conference. St. John’s College, Queens, May 29, 2014.

Reproductive Politics, SUNY Stonybrook, March 2013.

Eugenic Legacies and Infrastructures of Reproduction. UCLA Center for the Study of Women Roundtable. October 11, 2013.

“Reproductive Governance,” SUNY Stonybrook, September 2012

“Reclaiming a Useable Past: Identifying an Anti-Racist, Anti-Imperialist Feminist Tradition before 1984.” Brown University, April 2012.

Keynote, Reimagining the Child and the Place of Child Studies in the Academy, Dartmouth College, May 1, 2012.

Plenary Speaker on Immigration and Women’s Studies, National Women’s Studies Association, November 2011.

Gay adoption and Organ Theft: The limits of human rights and reproductive rights, National Library of Medicine, June 8, 2010.

Transnationalizing American Studies seminar, Brown University, February 24, 2010.

Guatemalan Family Values: The Christian Right, International Adoption, and the Transnationalization of the Culture Wars, Brown University, February 24, 2010.

Adoption, Immigration, and Privatization. 34<sup>th</sup> Annual Scholar & Feminist Conference, The Politics of Reproduction: New Technologies of Life, Barnard College, Barnard Center for Research on Women, New York, NY, February 28, 2009.

Adoption, Immigration, and Reproductive Labor. Institute for Humanities Research, Arizona State University, April 16, 2008.

### Conferences

2016 “Gay Married, with Children,” National Women’s Studies Association Quebec City, Quebec, November.

“The Problem with Thinking Through the Nation: The Case of Central American Child Migrants,” American Studies Association Annual Meeting, Denver, CO

“Disposable Children: Theorizing Futurity, Queer and Otherwise, in the Americas” Tepoztlán Institute for Transnational History. Tepoztlán, Morelos, Mexico, July.

The United States in a Caribbean World. Invited Panel, Organization of American q Historians. Providence, RI



- 2015 ASA  
NWSA  
Comment. "Género en movimientos y diásporas indígenas. Tepoztlán Institute for Transnational History. Tepoztlán, Morelos, Mexico, July 2015.
- 2014 "Accumulation by Dispossession: Finance, Foreclosure, and the High Cost of Reproduction in Puerto Rico," National Women's Studies Association, San Juan, Puerto Rico, November 13-16, 2014.  
"Transnational Feminism," National Women's Studies Association, San Juan, Puerto Rico, November 13-16, 2014.  
"Lessons Learned from the Transnational Feminisms Summer Institute," National Women's Studies Association, San Juan, Puerto Rico, November 13-16, 2014.  
Comment, The Politics of Need and Desire in Neoliberal Culture, American Studies Association, November 5-8, Los Angeles, CA.  
"Nannied out: Reproductive Stratification, Migration, and Long-Distance Motherhood," Berkshire Conference on the History of Women, Toronto, ON May 22-25, 2014.  
Roundtable participant, Radical Texts & Political Acts: Forty Years of Reading Margaret Randall, Berkshire Conference on the History of Women, Toronto, ON May 22-25, 2014.
- 2013 From Cold War Latin America to Occupy Student Debt: Forty Years of Structural Adjustment. American Studies Association Annual Meeting. Washington, DC, November 20-24.  
All Politics are Reproductive Politics, National Women's Studies Association Annual Meeting, Cincinnati, OH, November 7-10.  
Comment, Brave New Worlds: Race, Capital, Reproduction, Rethinking Marxism Conference, Amherst, September 19-22.  
With Christie Barcelo, Eve Ng, Banu Subramaniam, and Julie Russo, "Digital Feminisms." At Mediating Public Spheres," Five College Women's Resource Center. May 2013.
- 2012 "Overpopulation Revisited: The Globalization of Evangelical Christian "Family Values," Adoption, and the New Fight Over What to Do About 'Their' Children," American Studies Association, invited panel on Global Health and Empire, San Juan, Puerto Rico, November 15-18.  
"Reproductive Technologies and Social Justice," National Women's Studies Association Annual meeting, Oakland, CA November 8-11.
- 2011 Comment, Gender and Indigenous Adoption, Berkshire Conference on the History of Women, Amherst, MA June 7-12.
- 2010 Comment, World Hunger and the Politics of Poverty: A Dialogue among Historians of Africa, Latin America, and the United States, American Historical Association, San Diego, January 7-10.
- 2009 Puerto Rican Women and Sterilization: The Problem of Agency and the Politics of Reproductive Justice. American Anthropological Association. Philadelphia, PA, December 3-6.  
"Foreign and Domestic: Stratified Reproduction, Adoption, Migration," American Studies Association Annual Meeting, Washington, DC, November 5-8.  
"Picturing the Sad-eyed Child: Producing Orphans, Producing U.S. Foreign

- Policy,” Feeling Photography Conference, Toronto, October 16-17. (Invited)
- “Children of Guatemala’s Civil War: Disappearances, Human Rights, and Adoption,” Tepoztlán Institute for the Transnational History of the Americas Meeting July 22-29.
- “The Political Economy of Adoption: The Neoliberalization of Child Welfare,” Unequal Childhoods II: Adoption and Fostering, LASA Conference, June 11-14.
- 2008 “Transnationalism and Diaspora in the History of Race and Medicine,” Making Race, Making Health: Historical Approaches to Race, Medicine and Public Health, University of Texas at Austin, Austin, TX, November 13-15. (Invited)
- Transracial Adoption and the Multiracial Family, 1950–2000: Pinko Queer Revolt or Neoliberal Wet Dream? American Studies Association Conference, Albuquerque, NM October 16-19.
- “From Billy Graham to Pedro Pan: Evangelicals, Anticommunism, and Immigration Law in Transnational Adoption to the U.S.,” Organization of American Historians, New York, NY, March 28-31.
- Roundtable, Toward a Transnational History of Disability, American Historical Association, Washington D.C., January 3-6.

**Grants**

State

Arizona Humanities Council, Faculty Mentors for Youth (\$3000), 2002-03.

University

2012-2013	Digital Feminism	\$15,000	Co-PI	Five College Inc. Digital Humanities
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Provost’s Author Support Fund, University of Arizona (\$1000), 2008.

Faculty Research Development Grant, University of Arizona (\$500), 2008.

Faculty Research Development Grant, University of Arizona (\$500), 2006.

**TEACHING**

**Courses** (last 10 years)

Semester	Number	Course name	Enrollment
Fall 2017	187	Gender, Sexuality and Culture	94
Spring 2017	691B	Issues in Feminist Research	15
Fall 2016	230	Politics of Reproduction	28
Spring 2016	285	Intro to Biology Of Difference	52
Fall 2015	295M	Politics of Reproduction	24

		and Mothering	
Spring 2015	695A	Transnational	14
Fall 2014	295M	Feminisms Politics of Reproduction and Mothering	29
Spring 2014	285	Bio of Difference	25
Fall 2013	791B	Feminist Theory	17
Spring 2013	WOMENST 285	Bio of Difference	45
Fall 2012	695A	Transnational Feminisms	8
Spring 2012	WOMENST 285	Bio of Difference	60
Fall 2011	WOMENST 392G	Race/Gender: Genealogies, Formations, Politics	7
Spring 2011	GWS 240-1 GWS 240-2	Gender in a Transnational World	98
Fall 2010	GWS 639	Feminist and Related Social Movements	7
Spring 2010	GWS 240-1 GWS 240-2	Gender in a Transnational World	96
Fall 2009	GWS 639	Feminist and Related Social Movements	8
Spring 2009	WS/ANTH 586	Transnational Feminisms	18
Fall 2008	Course release per terms of Dept. Head offer		

### Teaching Awards and Grants

ABOR Learner-Centered Education Grant, ““Developing a Library of Online Course Materials for Gender and Women’s Studies” (\$7,918.45), 2010.  
 UA Magellan Circle Award for Excellence in Graduate Teaching, 2009.  
 UA Magellan Circle Award for Excellence in Graduate Teaching, 2009.

### Departmental Sponsor

Aviva Richardson  
Maria Bastos-Stanek  
Paige Smith-Hogan  
Carrie Nagle  
Stephanie

#### **Undergraduate Internship Supervisor (last five years)**

WGSS Digital Presence, 2012.  
Planned Parenthood, 2009.  
Women in Science and Engineering High School Mentoring, 2009.  
ASUA Women's Resource Center 2007, 2008, 2009.  
Aurora Foundation, Summer 2006.  
EO/AA Office, University of Arizona, Fall 2006.  
Arizona's List (2), Fall 2006.  
Planned Parenthood, Spring 2005.  
Jewish Community Nursing Home, Spring 2005.

#### **Undergraduate Independent Studies**

Maribel Morales, Div III exam, Hampshire College, 2013-2015  
Madeleine Burrows, Div III exam, Hampshire College, 2012-13.  
Digitizing the Public Sphere, 2012.  
Eugenics (3), Fall 2008.  
McNair Program Student Advisor, Summer 2007.  
Summer Research Institute Student Advisor, Summer 2007.  
Histories of U.S. State Repression from the Red Scare to the Patriot Act, Spring, 2003.  
Cloning, Abortion, and Breast Cancer Research, Spring, 2002.  
Cloning and Stem Cell Research, Fall 2001.  
Postcolonial and Critical Race Feminisms, Fall, 2000.  
Race in the United States, Spring, 2000.  
Gender and Science, Spring, 1999.

#### **Undergraduate Honors Theses**

Naomi Mastico, WGSS, Honors Thesis 2015-16  
Megan Lieff, 2012-13  
Sara Tankersley, "Guatemala: A Baby Factory?" 2008-09.  
Naomi Mastico, 2015-16

#### **Graduate Reading Groups**

Central America 2016-17  
Jose Muñoz Queer Theory Reading Group, 2014  
Critical Hermeneutics, Spring 2010.  
Globalizations/Transnationalism Reading Group, Spring, 2006.

#### **Dissertations, Committee Member, Current**

Faune Albert, English, UMass  
Kevin Henderson, Political Science, UMass  
Julieta Chaparro, UMass Anthropology  
Martha Balaguera, Political Science, UMass  
Eli Bromberg, English, UMass  
Ana Maria Ospina Pedraza, Political Science  
Joy Jansen, English

**Grad Certificate Projects, present**

Katty Alhayek  
Ana Ospina  
Julieta Chaparro  
Kevin Henderson  
Woori Han

**Comprehensive Exams, Present**

Joy Jansen, English, UMass

**Comprehensive Exams, past**

Berra Topcu, UMass Anthropology  
Julieta Chaparro, Anthropology

**Dissertations, Directed, Past**

Maria Galup, Gender and Women's Studies, UA  
Erin Durban, "Postcolonial Homophobia: United States Imperialism in Haiti and the Transnational Circulation of Anti-Gay Sexual Politics." Gender and Women's Studies, UA. \*\*2015 Winner of the prestigious Ralph Henry Gabriel Prize from the American Studies Association and the NWSA-University of Illinois First Book Prize\*\*  
Ronit Fainman-Frenkel, "On the Fringes of Dreamtime...': South African Indian Literature and the Instability of Post-Apartheid Racial Taxonomies," Comparative Cultural and Literary Studies.  
Jodi Kelber-Kaye, "Straighten Up and Breed White: The Representation of Race and Sexuality in Films About Reproductive Technologies" Comparative Cultural and Literary Studies.

**Dissertations, Committee Member, Past**

Eva Payne, Harvard University, American Studies  
Chris Barcelos, Public Health  
Sara Matthiessen, Brown University, American Studies  
Kelly Grey, UMass Higher Ed  
Amy Grey, History, UA  
Jamie Wilson, Spanish and Portuguese, UA  
Wendy Vogt, Anthropology  
Eva Romero, Spanish and Portuguese

Lucy Lee Blaney, Spanish and Portuguese  
Lee Blouin, English  
Karin Fredrichs, Anthropology.  
Lauren Carruth, Anthropology  
Araceli Masterson, Spanish & Portuguese, "Producing Space and Cultural  
Cartographies: Ecuadorian Migrants in Madrid, Spain." (2009)  
Angela Ross, English, "The Princess Production: Locating Pocahantas in Time  
and Place" (2008).  
Kate Goldade, Anthropology, "South-to-South Migration, Reproduction, and  
Medical Citizenship: The Paradoxes of Proximity for Nicaraguan Labor  
Migrant Women in Costa Rica" (2008).

**Grad Certificate Projects, past**

Faune Albert, English  
Seda Saluk, Anthro  
Martha Balaguera  
Jennifer Zenovich  
Erika Arthur, UMass History

**MA Theses, Directed**

Angela Stoutenburgh, GWS  
Adrian Flores, GWS  
Heather Fukunaga, Women's Studies.  
Jonna Lopez, Women's Studies.  
Lucas Whitman, Latin American Studies.  
Ellis Ogburn, Women's Studies.  
Jean Li, Women's Studies.  
Shefali Desai, Women's Studies and Law.  
Adrienne Crump, Women's Studies.  
Natalie Josef, Women's Studies.  
Yasuko Doguchi, Women's Studies.  
Jennifer Tersigni, Women's Studies.

**MA Theses, Committee Member**

Erin Durban, Women's Studies  
Mari Galup, GWS  
Carly Thomsen, Women's Studies.  
Jeanette Silleck, Women's Studies.  
Dylan Simosko, Women's Studies.  
Miluska Martinez, Latin American Studies.  
Lucas Whitman, Latin American Studies.  
Laura Belous, Mexican American Studies.  
Alexa Priddy, Women's Studies.  
Lucy Lea Blaney, Latin American Studies.

Darcy Alexandra, Language Reading & Culture.  
Heather Mikolaj, American Indian Studies.  
Lisa Knisely, Women's Studies.  
Kate Goldade, Anthropology.  
Erika Giesen, Women's Studies.  
Sarah Arvey, Latin American Studies.

### **Development and Scholarly activity supporting teaching articles**

Interviewed in Diana Turk et al., *Teaching U.S. History: Dialogues among Social Studies Teachers and Historians* (Rutgers: Rutgers University Press, 2010).  
(with Jen Croissant, Sharla Fett, and Marta Civil) "Gender and Science across the Curriculum: Students Respond," Caryn McTighe Musil, ed., *Gender, Science, and the Undergraduate Curriculum: Building Two-Way Streets* (Washington, AAC&U, 2001).  
"New Technologies and Education," in *Women's Review of Books* (February, 2001).

### **Service/Outreach**

#### Articles for a Popular Audience

"Little Bug Wants a Doll," in Lori Rotskoff and Laura Lovett, eds. *When We Were Free to Be: Looking Back at a Children's Classic and the Difference it Made*. (Charlotte, NC: University of North Carolina Press, 2012).  
"Women's History Month," *OAH Newsletter* 36: 1 (February 2008): 1, 6.

#### **Service to the Profession**

##### External Reviewer for Tenure/Promotion

New York University  
The Ohio State University  
Boston College  
Notre Dame  
City University of New York (3)  
University of California, Santa Barbara  
University of California, San Diego  
University of North Texas  
Washington State University  
University of Michigan (2)  
University of Texas  
Drake University

##### External Program Reviewer

University of California/Santa Cruz

Vanderbilt University  
Wesleyan College  
Williams College

Manuscript Reviewer

*University of California Press*  
*Duke University Press*  
*New York University Press*  
*Rowman and Littlefield*  
*Rutgers University Press*  
*American Quarterly*  
*Centro de Estudios Puertorriqueños Bulletin*  
*Signs*  
*Comparative Studies in Society and History*  
*Critical Sociology*  
*Gender and History*  
*Gender and Society*  
*GLQ*  
*Journal of American History*  
*Journal of Women's History*  
*National Endowment for the Humanities*  
*NWSA Journal*  
*Social Forces*  
*Meridians*  
*Social Problems*  
*Reproductive Biomedicine and Society*

Professional Service

Rourke Prize Committee, American Studies Association, 2004, 2015, 2016.  
International Committee, American Studies Association, 2014-2017.  
National Council, American Studies Association, 2014-2017.  
International Committee, American Studies Association.  
Book Review editor, *American Quarterly*, 2014-18.  
Co-chair, Transnational Feminisms Task Force, National Women's Studies Association, 2014.  
ADVANCE PAID panel member, National Science Foundation, January 2013  
Organizing Committee, Transnational Feminisms conference, Summer 2014.  
LGBTQ History Task Force, Organization of American Historians, 2011-2012.  
Editorial Committee, American Crossroads Series, University of California Press, 2009-  
Editorial Board, Reproductive Justice Series, University of California Press, 2016-present  
Tepoztlán Institute for Transnational History, collective member, 2004-2010; co-  
director, 2009-2010.  
Committee on the Status of Women in the Historical Profession, Organization of  
American Historians, 2005-09; Chair, 2007-08.



### **Service to the University**

Joint Task Force Resource Allocation, UMass, 2014-2016.  
Program Review Committee, Stonewall Center, Fall 2014.  
Search Committee, Endowed Chair in Nonviolence Studies, 2013.  
Academic Matters Committee, Faculty Senate, UMass, 2013.  
Sherill Creative Teaching Awards Committee, UA, Spring 2010, 2011.  
Search Committee, VP for Legal Affairs/Office of the General Counsel, 2009.  
Search Committee, Dean of Social and Behavioral Sciences, 2009.  
SBS Scholarship Selection Committee, Spring 2009.  
Elected Representative, Dept. Head's Advisory Committee to UA President Shelton,  
2008-2010.

### **Service to Communities**

#### Community Boards/Advisory Committees

Women's Studies Advisory Committee, 2008-10.  
Women's Plaza of Honor Board, Publicity Committee 2008-10.  
Elizabeth Lapovsky Kennedy Graduate Fellowship fundraising committee, 2008-10.  
Voices: Community Stories, Past and Present (youth magazine), 2000-04.  
Faith-based Immigration Groups: Guatemala Project, Samaritans, Humane Borders,  
2003-2007.

#### Member

National Organization for Women, Tucson, 2008-2011.  
Arizona List, 2006-2012.  
YWCA, Tucson, 2008-2011.

#### Public/Community Talks

"Feminism" for Social Justice Week, Northampton High School, May 18, 2015.  
Panelist, Screening of "The Response" (on torture), ACLU, September 29, 2009.  
Panelist, Politics of Birth Control, ASUA Women's Resource Center, March 12, 2009.  
Panelist, Women and Politics: The 2008 Election, ASUA Women's Resource Center  
and Arizona List, October 28, 2008.  
Societal Implications of Genetic Research, Panelist. University of Arizona Genetics and  
Society Roundtable, Tucson, September 19, 2008.

### **AFFILIATIONS**

American Studies Association  
Organization of American Historians  
American Historical Association  
Latin American Studies Association  
National Women's Studies Association

**Exhibit B: The History of Child Separation in order to Deter Actions by Parents  
with Respect to Native Children in the United States and Purported Leftists in Latin  
America**

1. The current policy of separating children from their parents in order to deter border crossers is not the first time that the U.S. federal government has separated children from their parents in order to achieve a political goal. It also separated Native American children from their parents as a strategy to end the Indian Wars of the nineteenth century. Child separation was also the policy of a number of Latin American dictators and paramilitaries in the mid-twentieth century, which sought to terrorize communities thought to be involved in insurgencies and to avoid the raising of another generation of “reds.”
2. In each of these instances, people of conscience found these policies abhorrent, and activists and government policy-makers reformed them.

**Native American Child Separation**

3. Beginning in the late 1870s, separating Native children from their families and communities was foundational to federal policy to “civilize” the savage, to teach children English, and to extinguish traditional religions, tribal organization, and ways of life.
4. On July 20, 1867, during a pause in the Indian Wars, Congress established the Indian Peace Commission to negotiate with Plains Indian tribes who were warring with the United States in order to secure frontier settlements, land for agriculture, mining and mineral rights, and to allow for the building of the railroads. The Peace Commission met in St. Louis, Missouri, on August 6, 1867,

- and traveled throughout the contested lands, from Missouri to the Dakotas to California. The Commissioners argued that lasting peace was contingent upon separating Indians regarded as "hostile" from those regarded as friendly, removing all Indian tribes onto reservations away from the routes of U.S. westward expansion, and making provision for their maintenance.<sup>1</sup>
5. The official report of the Commission to the President of the United States, dated January 7, 1868, described numerous social and legal injustices to Indians, repeated violations of numerous treaties, including settlement on their land, acts of corruption by many of the local agents, and culpability of Congress in failing to fulfill certain legal obligations. Members of the Commission charged that employees of the railroad were shooting down Indians "in wonton cruelty."
  6. The purpose of detailing these depredations by whites was to inaugurate a new policy: of civilizing the Indians in order to secure their lands, build new settlement, expand agriculture and mining. The Commission said that beyond the dishonesty, massacres, and unkindness of whites, the problem was also "the tribal or clannish organization" of Native people, and their failure to speak English. And so the Commission proposed the following plan:  
  
 "Agriculture and manufactures should be introduced among them as rapidly as possible; schools should be established which children should be required to attend; their barbarous dialects should be blotted out and the English language substituted...The object of greatest solicitude should be to break down the

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<sup>1</sup> "Report to the President by the Indian Peace Commission" (January 7, 1868), in *Annual Report of the Commissioner of Indian Affairs for the Year 1868*, (Washington, D.C.: Government Printing Office, 1868).

- prejudices of tribe among the Indians; to blot out the boundary lines which divide them into distinct nations, and fuse them into one homogeneous mass. Uniformity of language will do this -- nothing else will.”<sup>2</sup>
7. The proposal of the Peace Commission, in short, was to shift Native economies to those that would integrate well with the United States and require a much smaller land base (and one that could be held by individuals, rather than tribes, making it easier for whites to buy or take the land), through boarding school education. This was, ultimately, exactly what happened as a result of the Dawes Act and boarding school policy. It is estimated that the land base of Indian country was depleted from 138 million acres of treaty land in 1887 to a mere 48 million acres when allotment was finally halted in 1934, of which 20 million of the remaining land was desert or semi-desert.<sup>3</sup>
  8. The shift from warfare to schools that could exterminate “barbarous dialects” and teach children to farm, however, was not fully taken up for nearly another decade, until after open warfare between the Sioux (or Dakota/Lakota) and the US Cavalry flared again in a dispute over mining in the Black Hills, sacred to the Lakota, in a war that included the defeat of the 7<sup>th</sup> Cavalry at the Battle of Little Bighorn (“Custer’s last stand.”). U. S. Grant annexed the Black Hills in 1877, after a military “surge” and great loss of life on both sides, including the culmination of an effort to starve Native peoples through the slaughter of buffalo

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<sup>2</sup> Francis Paul Prucha, ed., *Documents of United States Indian Policy*, 2nd Edition ed. (Lincoln: University of Nebraska Press, 1990)., p. 107.

<sup>3</sup> William C. Canby, Jr., *American Indian Law in a Nutshell*. 4th ed. Nutshell Series. St. Paul, MN: West, 2004.

and demoralize them through assaults on women and children. Various chiefs of the Sioux federation sought peace, including Red Cloud (Oglala) and Spotted Tail (Sicangu), though the Sioux never ceded the Black Hills (even when the US carved presidents' faces in them and renamed one the Mount Rushmore National Monument).<sup>4</sup>

9. When it became clear that final military victory would remain elusive, the US federal government finally substituted boarding schools for the Cavalry. In 1878, the War Department ordered Lieutenant Richard Pratt to go Dakota Territory to begin the work of Indian education, specifically contacting “friendly” chiefs, Red Cloud and Spotted Tail, and taking children as “hostages for the good behavior of their people.”<sup>5</sup> Pratt was chosen because of his experience commanding a Black Cavalry regiment in Oklahoma (“Buffalo soldiers”), and experiments in the education and discipline of Indian prisoners from the Red Hills War at Fort Marion in St. Augustine, Florida, and at Hampton Institute. The Fort Marion prisoners were considered singularly uncivilized and hostile, and Pratt had succeeded by mixing tribes, having Indians of different tribes guard and discipline each other, cutting their hair, teaching them English, compelling them to clean and cook, and instituting military drills and tribunals (in which some prisoners sent others to the dungeon) and forcing prisoners to attend church. (He also

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<sup>4</sup> James C. Olson, *Red Cloud and the Sioux Problem* (Lincoln: University of Nebraska Press, 1968); David Humphreys Miller, *Ghost Dance* (Lincoln: University of Nebraska Press, 1985).

<sup>5</sup> Linda F. Witmer, *The Indian Industrial School, Carlisle, Pennsylvania, 1879–1918* (Carlisle, PA: Cumberland County Historical Society, 1993), p. 31.

participated in torturing and killing some of them.)<sup>6</sup> In 1879, while still on active duty, he opened the Carlisle Indian School, using many of these same practices and taking Dakota children far away to Pennsylvania and teaching them English, farming, and Anglo-American ways of living. Children were prevented from returning home during the summer months, because of concerns that they would revert to “savagery,” and were instead distributed to local households—girls to do housework, boys to farm. Pratt relied on military-style drills, corporal punishment, and capture and incarceration of runaways to enforce his educational methods. Epidemics of cholera, influenza, and tuberculosis devastated children’s numbers there, and many were buried in a cemetery on the grounds. Pratt’s goal, he said, was to “kill the Indian to save the man”—eliminate children’s “Indian-ness” as an alternative to warfare and extermination.<sup>7</sup>

10. Following the success of Pratt and the War Department, Christian missionaries and civil society “Friends of the Indian” groups began opening larger numbers of boarding schools in the 1880s to “civilize” indigenous peoples. In 1881, Congress declared school attendance for Indian children compulsory, and authorized the Indian Bureau to deny benefits guaranteed by treaty right if children failed to attend; they were to “withhold rations, clothing, and other articles from those parents who resisted sending their children to school.”<sup>8</sup> Indian boarding schools

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<sup>6</sup> Richard Henry Pratt, *Battlefield and Classroom: Four Decades with the American Indian, 1867-1904*, ed. Robert Marshall Utley (New Haven: Yale University Press, 1964).

<sup>7</sup> Hayes Peter Mauro, *The Art of Americanization at the Carlisle Indian School* (Albuquerque: University of New Mexico Press, 2011).

<sup>8</sup> Theodore Fischbacher, *A Study of the Role of the Federal Government in the Education of the American Indian*, cited in David Wallace Adams, “Fundamental Considerations:

spread through the West and Midwest. “Before and after” photos were popular throughout the United States to show the process of “civilizing” Indian children. Boarding school photos circulated like trophies among whites. As American Indian Studies scholar K. Tsianina Lomawaima writes, “The famous ‘before and after’ pictures of Carlisle students are as much a part of American iconography as the images of Custer’s Last Stand. ‘Savages’ shed buckskin, feathers, robes, and moccasins; long black hair was shorn or bobbed or twisted into identical, “manageable” styles; pinafores, stiff starched collars, stockings, and black oxfords signified the ‘new woman.’”<sup>9</sup>

11. The process of separating Native children from their parents was often violent and involved children as young as five or six. One witness, writing in 1930, reported on conditions on the Navajo (Diné) reservation. “In the fall the government stockmen, farmers, and other employees go out into the back country with trucks and bring in the children to school...the wild Navajos, far back in the mountains, hide their children at the sound of a truck. So stockmen, Indian police, and other mounted men are sent ahead to round them up. The children are caught, often roped like cattle, and taken away from their parents, many times never to return... I have heard too many stories of cowboys running down children and bringing them hogtied to town to think it is all an accident... They are transferred from school to school, given white people's names, forbidden to speak their own

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The Deep Meaning of Native American Schooling, 1880–1900.” *Harvard Educational Review* 58, no. 1 (1988): 1–28.

<sup>9</sup> K. Tsianina Lomawaima, “Domesticity in the Federal Indian Schools: The Power of Authority of Mind and Body,” *American Ethnologist* 20, no. 2 (1993).

tongue, and when sent to distant schools are not taken home for three years.”

Some, especially children who ran away, would be taken across the country and did not return until they were 16 or 18.<sup>10</sup>

12. Tribes, and occasionally even white lawyers and courts, were shocked by the violence of the Pratt system of Indian education and the removal of Indian children. In 1899, a federal district court granted a writ of habeas corpus to an Iowa tribe that demanded the return of Native child from a boarding school in 1899, suggesting an alternative trajectory that might have ended boarding schools much sooner had it been followed. It found that tribes had to consent to the removal of a child.<sup>11</sup>
13. Nevertheless, federal agents and missionaries ignored this court order and continued to promote compulsory off-reservation boarding schools, in some places until the late 1970s,<sup>12</sup> arguing that it was essentially to the civilization process. Few Native children attended day schools or lived at home. Living on the reservation, especially with their parents, meant that children would revert to “savagery” by night, undoing the good work of the school’s civilizing mission by day.<sup>13</sup> Visits home were also seen to impede the assimilation process, and were

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<sup>10</sup> Dane Coolidge, "'Kid Catching' on the Navajo Reservation: 1930," in *The Destruction of American Indian Families*, ed. Steven Unger (New York: Association on American Indian Affairs, 1977)., pp. 18-21.

<sup>11</sup> In re Lelah-Puc-Ka-Chee 98 F. 429 (N.D. Iowa 1899).

<sup>12</sup> Unsigned, "Historic School Victory," *Indian Family Defense: Bulletin of the Association on American Indian Affairs, Inc.* 1976.

<sup>13</sup> *Annual Report of the Commissioner of Indian Affairs*, 1880, cited in David Wallace Adams, "Fundamental Considerations: The Deep Meaning of Native American Schooling, 1880-1900," *Harvard Educational Review* 58, no. 1 (1988). P. 13.



discouraged as a matter of policy.<sup>14</sup> Instead, children across the country were “farmed out” in the summers, boys working as ranch hands and farm laborers, girls doing domestic labor.<sup>15</sup>

14. Scholars agree that the regimens at boarding schools were harsh. Children were punished, often beaten, for speaking indigenous languages; dress was carefully monitored and checked by staff.<sup>16</sup> Some scholars have suggested that sexual abuse of both girls and boys was rife in boarding schools; an investigation into sexual abuse in boarding schools in Canada in the 1970s resulted in 3,400 complaints of sexual abuse. No similar investigation took place in the United States, although some have argued that any full inquiry into the crimes in U.S. Indian boarding schools would find not only starvation, but also medical experimentation, involuntary sterilization of girls, and physical punishment that amounted to torture.<sup>17</sup> A recent survey of boarding school attendees found that nearly 30% reported that they had been sexually abused there.<sup>18</sup>

15. Yet there was one official inquiry into boarding schools in the United States.

Throughout the 1920s, Indian policy reform advocates ran ever-more vociferous

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<sup>14</sup>Brenda Child, "Runaway Boys, Resistant Girls: Rebellion at Flandreau and Haskell, 1900-1940," *Journal of American Indian Education* 35 (1996).

<sup>15</sup> Margaret Archuleta et al., *Away from Home: American Indian Boarding School Experiences, 1879-2000* (Phoenix, Ariz.; Santa Fe: Heard Museum; Distributed by Museum of New Mexico Press, 2000).

<sup>16</sup> *Ibid.*

<sup>17</sup> Andrea Smith, *Conquest: Sexual Violence and American Indian Genocide* (Cambridge, MA: South End Press, 2005).

<sup>18</sup> T. Evans-Campbell, Walters, K. L., Pearson, C. R., & Campbell, C. D. (2012). “Indian Boarding School Experience, Substance Use, and Mental Health among Urban Two-Spirit American Indian/Alaska Natives.” *The American Journal of Drug and Alcohol Abuse*, 38(5), 421–427.

campaigns about the horrors of Indian policy, including ongoing land-theft, detribalization, and the suppression of Native culture, language, and religious practices, and insisting that child-separation and boarding school policies were a keystone. As a result of this public pressure, Hubert Work, the Secretary of the Interior commissioned an independent report by the Institute for Government Research, aiming to prove that the public campaign was rank exaggeration. The 1928 report, *The Problem of Indian Administration*, (better-known as the Meriam Report, for its author), suggested that things were, if anything, worse than the press accounts had had it, with special reference to boarding schools. It described children living in overcrowded dormitories, without even adequate toilet facilities at times, subsisting on a vastly inadequate diet, subject to terrible health conditions, ill-clad. Boarding schools “operated below any reasonable standard of health and decency,” as Lewis Meriam wrote. Children suffered high rates of illness and death, and were subject to a curriculum of little value; the report noted continued high rates of illiteracy. They had virtually no leisure time, and were forced to do manual labor to support the school (in apparent violation of child labor laws, the report noted). It urgently recommended that children be returned to their parents and communities. “The continued policy of removing Indian children from the home and placing them for years in boarding schools largely disintegrates the family and interferes with developing normal family life.”<sup>19</sup>

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<sup>19</sup> See e.g., John. Collier, “American Congo.” *Survey*, August 1, 1923; “America’s Treatment of Her Indians.” *Current History* (August 1923): 771–78. Kenneth R. Philp, *John Collier’s Crusade for Indian Reform, 1920–1954*. Tucson: University of Arizona Press, 1977. Institute for Government Research, *The Problem of Indian Administration; Report of a Survey Made at the Request of Honorable Hubert Work, Secretary of the*

16. The report's effect was electric. President Hoover immediately and publicly increased the allocation to boarding schools for food and clothing for children. Within a few years, a leader of the reform campaign, John Collier, was heading up the Bureau of Indian Affairs, and introduced significant changes designed to recognize tribal organization and Native religion and culture, halt the reduction of the land base of Indian Country, and close boarding schools in favor of day schools.<sup>20</sup>
17. The effects of boarding schools on children and Native communities was devastating. Mortality rates among children were very high. Those children who did return had often forgotten their native language and sometimes had no language in common with their parents. As one agent with the Indian Service, Dane Coolidge, noted, "Back in the hogans of their people the returned school[children] are quite unfitted for their life... They start in all over again to learn to spin and weave and handle their sheep and goats."<sup>21</sup> Many attribute high rates of violence, family dysfunction, alcoholism, and drug abuse among some Native communities to the legacies of the boarding school experience, and the fact that for years, few Indian children were raised by their parents. One scholar wrote, "I have attended several Native wellness workshops in which participants are asked to draw a family tree that shows the generation in their family in which

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*Interior, and Submitted to Him, February 21, 1928.* (Washington: Brookings Institute, 1928). Quotes at pp. 348, 15.

<sup>20</sup> Philp, *Collier's Crusade*.

<sup>21</sup> Dane Coolidge, "'Kid Catching' on the Navajo Reservation: 1930," in *The Destruction of American Indian Families*, ed. Steven Unger (New York: Association on American Indian Affairs, 1977).

violence, substance abuse, and other related problems develop. Almost invariably, these problems began with the generation that first went to boarding school.”<sup>22</sup> In the 1970s, the American Psychiatric Association published an influential editorial that called boarding schools “a hazard to mental health.”<sup>23</sup> In 1977, psychiatrist Joseph Westermeyer testified before Congress that the American Indian family was in “crisis” as a result of the “ravages” of boarding schools and other familial separations, citing alcoholism and suicide attempts by parents who lost their children.<sup>24</sup>

18. The legacy of boarding schools lives in people who are currently alive and among us. Although day schools became more common in the 1930s, and boarding schools were largely phased out in the 1970s, the harm of being separated from parents at a young age continues into the present. In 1974, a survey by the American Association of Indian Affairs found one in three Native children separated from their parents, either in boarding school, foster care, or adoptions.<sup>25</sup> That number had actually risen by 1987, when another survey found even higher

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<sup>22</sup> Smith, *Conquest*, p. 44.

<sup>23</sup> "A Hazard to Mental Health: Indian Boarding Schools." *American Journal of Psychiatry*, 131(3), pp. 305–306.

<sup>24</sup> Select Committee on Indian Affairs, *Indian Child Welfare Statistical Survey, July 1976, Appendix G*, First Session on S. 1214, To establish standards for the placement of Indian children in foster or adoptive homes, to prevent the breakup of Indian families, and for other purposes, 4 August 1977; Select Committee on Indian Affairs, *Indian Child Welfare Act of 1977: Hearing*, First Session on S. 1214, To establish standards for the placement of Indian children in foster or adoptive homes, to prevent the breakup of Indian families, and for other purposes, 4 August 1977.

<sup>25</sup> Joseph A. Myers, *They Are Young Once but Indian Forever: A Summary and Analysis of Investigative Hearings on Indian Child Welfare, April 1980* (Oakland, Calif.: American Indian Lawyer Training Program, 1981), 92-93. Pp. 92-93.

rates of children separated from their Indian parents.<sup>26</sup> Scholars, mental health professionals, and activists may debate the proportions in which this is a legacy of policy—the habit of and deeply ingrained belief in separating Native children from parents--or familial pain in the aftermath of the trauma of the boarding school experience. Regardless, it is amply clear that Indian families continue to suffer as a result of federal policy that separated children from parents, even many generations later.

19. When children who had been separated at early ages from their parents grew into adults, they passed their trauma to their own children. In 2006, mental health professionals who surveyed nearly 500 Native American adults and youth found not only that the boarding school attendees in the group had much-elevated rates of suicide attempts, alcoholism, and drug abuse, but that children raised by boarding school attendees “are significantly more likely to have a general anxiety disorder, experience posttraumatic stress disorder symptoms, and have suicidal thoughts in their lifetime compared to others.”<sup>27</sup>

### **Latin America’s Child Separation Policies**

20. Right-wing dictatorships in Latin America in the 1970s, 80s, and 90s also kidnapped children and placed them in adoptions in the context of civil wars.

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<sup>26</sup> Margaret Plantz, *Indian Child Welfare: A Status Report: Final Report of the Survey of Indian Child Welfare and Implementation of the Indian Child Welfare Act and Section 428 of the Adoption Assistance and Child Welfare Act of 1980* (Washington, D.C.: U. S. Department of the Interior, 1988.)

<sup>27</sup> T. Evans-Campbell, K. L. Walters, C. R. Pearson, and C. D. Campbell, “Indian Boarding School Experience, Substance Use, and Mental Health among Urban Two-Spirit American Indian/Alaska Natives,” *The American Journal of Drug and Alcohol Abuse*, 38:5 (2012): 421–427.

These governments received backing from the United States, although it is unclear whether there was also support for the deliberate separation of children. Ultimately, however, human rights activists uncovered—and continue to uncover—these practices and reunified children with their parents and biological relatives. In Argentina, activists have found 117 of the estimated 500 children who were taken from their leftist parents during the military dictatorship from 1976-1983—separated either at the time of left activists’ murder or incarceration, or later, after the rape and torture of women prisoners had resulted in the birth of a child. Members of the military described the goals of the program in two ways, either as a desire to prevent the children from learning to be “subversives” from their parents, or to frighten leftists into desisting.<sup>28</sup> The actions of the Madres de Plaza de Mayo and the Abuelas de Plaza de Mayo (mothers and grandmothers of the Central Square in Argentina) has resulted in the creation of a DNA database that has, in many cases, helped identify these children (in adulthood) and restore some relationship to their natal family. The harm of the adoption has generally been found to have been greater than learning the truth, but the experience has been deeply traumatizing. As geneticists Victor B. Penchaszadeh wrote, “The emotional shock experienced by the children when learning that the adults who were raising them had been, at a minimum, accomplices in the disappearance and murder of their parents, was of great magnitude in all cases. Initial disbelief and

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<sup>28</sup> Abuelas de la Plaza de Mayo, "Abuelas de la Plaza de Mayo," <http://www.abuelas.org.ar/>. Rita Arditti, *Searching for Life: The Grandmothers of the Plaza de Mayo and the Disappeared Children of Argentina* (Berkeley: University of California Press, 1999).

feelings of despair led some older children and adolescents initially to resist.”<sup>29</sup>

All but a few, however, have reignited ties with their natal parents’ surviving family.

21. In Central America’s Northern Triangle (Guatemala, El Salvador, Honduras), there is a significant history of militaries and paramilitaries punishing civilians for their actions or beliefs (or purported beliefs) through murder and terror. The US-backed Guatemalan and Salvadoran right-wing governments’ government’s policy of “disappearing” civilians in the 1970s, 80s, and 90s is well-known. Between 1954 and 1968, during the Guatemalan Civil War, an estimated 40,000 to 50,000 people were disappeared by the government, accused of backing leftist insurgents. (Many of these people were undoubtedly innocent, guilty of nothing more than belonging to certain indigenous groups, as the actual insurgency was quite small.) In Salvador, right-wing death squads killed as many as 35,000 civilians between 1980-83.<sup>30</sup> Honduras’ death squad from the 1980s, Battalion 316, killed or disappeared hundreds. It is widely believed to be operating again today in the aftermath of the 2009 (and 2017) coups d’état.<sup>31</sup>

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<sup>29</sup> Victor B. Penchaszadeh, “Ethical, Legal and Social Issues in Restoring Genetic Identity after Forced Disappearance and Suppression of Identity in Argentina.” *Journal of Community Genetics* 6.3 (2015): 207–213.

<sup>30</sup> Cynthia J. Arnson, "Window on the Past: A Declassified History of Death Squads in El Salvador," in Bruce Campbell and Arthur Brenner, eds, *Death Squads in Global Perspective: Murder with Deniability* (New York: St. Martin’s Press, 2000), p. 88.

<sup>31</sup> Gary Cohn and Ginger Thompson, "When a Wave of Torture and Murder Staggered a Small U.S. Ally, Truth was a Casualty," *The Baltimore Sun*. (11 June 1995). Available at <http://www.baltimoresun.com/news/maryland/bal-negroponte1a-story.html>. Nina Lakhani, “Did Hillary Clinton Stand By As Honduran Coup Ushered in Era of Violence?” *The Guardian* (31 August 2016). Available at <https://www.theguardian.com/world/2016/aug/31/hillary-clinton-honduras-violence-manuel-zelaya-berta-caceres>. Sarah Kinoshian, “Crisis of Honduras Democracy Has Roots

22. Less well-documented but increasingly important to international publics is the story of *children* disappeared in Guatemala and Salvador during the armed internal conflicts. Some were smuggled into international adoptions. Over time, documentation, identification, and sometimes reunions of Central American children disappeared during the war has grown steadily. In Guatemala, for example, a very multilingual country where many indigenous communities were wiped out and where distant mountainous communities were often unconnected to cities, the documentation process has been slow. In 1998, the official Truth Commission took testimony about 183 children kidnapped by militaries and paramilitaries during the war, but believed there were many more that the government should search for.<sup>32</sup> The Archbishop's Commission on Human Rights initially documented 216 disappeared children, then, in a later report, 444.<sup>33</sup> When the government continued to refuse to search for children disappeared, a number of NGOs came together to document cases, forming a single group, *Todos por el Reencuentro* (All for Reunification) which found 650 cases, arranged for 200 people to meet the families from which they had been separated, and estimated the total numbers of cases to be numbered in the thousands.<sup>34</sup>

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in US Tacit Support for 2009 Coup,” *The Guardian* (7 December 2017). Available at <https://www.theguardian.com/world/2017/dec/07/crisis-of-honduras-democracy-has-roots-in-us-tacit-support-for-2009-coup>

<sup>32</sup>Comisión para el Esclarecimiento Histórico (Guatemala) [CEH], *Guatemala, Memoria del Silencio = Tz'inil Na'tab'al*, vol. 12 v. ([Guatemala, Guatemala]: CEH, 1998)., capitol de recomendaciones, p. 66 (my translation)

<sup>33</sup> Oficina de Derechos Humanos de Arzobispado de Guatemala [ODHAG], *Hasta Encontrarte: Niñez Desaparecida Por el Conflicto Armado Interno en Guatemala*, 3rd ed. (Guatemala, Guatemala: ODHAG, 2005 [2000])., p. 60.

<sup>34</sup>Maco Garavito, personal communication, May 21 2008.



23. Human rights groups in El Salvador and Guatemala have collected testimony of survivors, such as the follow story from Jacinto Guzmán in Guatemala. He told

*Todos:*

“In 1983, because of the armed conflict and the scorched earth policy that General Efraín Ríos Montt directed against the population of Nebaj, soldiers captured me at the Sumal Grande mountain. At that time I was nine years old... During the years I was separated from my family I suffered a lot because the person who adopted me treated me very badly. I wasn’t given food, I was beaten for every little thing, I was discriminated against because I didn’t understand or speak Spanish...it was a lot of suffering that I lived through. I couldn’t stand all that mistreatment.”<sup>35</sup>

Guzmán did not see his family again for 19 years, until he was 28.

24. His mother, Petrona Santiago, also provided testimony about the “acts of genocide” against indigenous people, including the taking of children:

“Before the war we lived in the village of Vijolom. There we had a little ranch, our cornfield and some animals. In 1982 the soldiers came among us and began to kill the people, burned the house, destroyed the crops with a machete, killed and stole the animals. We were terrified and for that reason we fled to the mountain, we hid ourselves, but the soldiers stayed a long time in that place. Afterward we went further, into the mountain of Sumal Grande, but our tortillas ran out, we had no food, we had no salt, now all we ate was grass with the children. For this

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<sup>35</sup> Liga Guatemalteca de Higiéne Mental, *Corazones en Fiesta: Historias de Familias Reunidas Despues del Conflicto Armado* (Guatemala: Magna Terra Editoriales, 2005)., p. 53.

reason one day in the morning, my late husband told me that he was going to go look for potatoes to eat, because if he did not go the children were going to die of hunger. I remember that that day Jacinto left with his father to help him, but, according to my late husband, there was a lot of fog and he didn't see that the soldiers were hidden in the mountains. They came out and grabbed him and Jacinto, who was nine, and then they didn't come back. From that moment on, I cried constantly. Suddenly, after four days, my late husband came back alone and I asked him where Jacinto was, and he said that he had stayed with the soldiers, that they didn't want to release him. I only remember that I became very sad and began to cry for my son. There were times when I thought maybe they were going to let him go and I was going to wait for him; but my Jacinto never came back. Thus they took my Jacinto."<sup>36</sup>

25. In the decade after 2000, *Todos* published three books of testimony about disappeared, adopted, and (sometimes) reunited children.<sup>37</sup> For example, a father who lost his children in 1984, Tomás Choc relates:

“The army surprised us when we were in Guacamayas, Uspantán. It was a day in which the army surprised the [community's] look-outs, and when we knew what was happening, there were soldiers throughout the camp. Bullets flew everywhere. The only thing we could do was to go out running. When we

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<sup>36</sup> *Ibid.*, p. 55.

<sup>37</sup> Liga Guatemalteca de Higiéne Mental, *De Barro y de Hierro: Familiares de Niñez Desaparecido en el Conflicto Armado Interno en Guatemala* (Guatemala: Liga Guatemalteca de Higiéne Mental, 2002); *Corazones*; "Todos Por el Reencuentro," <http://www.ligatpr.org/>; Murillo Estrada and Liga Guatemalteca de Higiéne Mental, *A Voz en Grito: Contra el Olvido y el Silencio*.

succeeded in liberating ourselves from the danger of the soldiers, we started to look for our children. After a few hours I ran into the terrible surprise that the children were not with my wife. She didn't have more than one of our four children. We looked for them all night and all the next day, but nothing... We spent several weeks looking for them but failed. Sometimes it was me who gave up hope and cried, and when she saw me, my wife also collapsed. Other times it was her; she would cry and her sorrow was contagious to me.<sup>38</sup>

Years later, he would find one daughter, Ana, married to a soldier; the children had been adopted by families in other indigenous highlands communities. But it was not until 2001, and with the help of *Todos*, that he would learn the fates of all of them. The youngest, he learned from the adoptive family, had sickened and died. The two other daughters, they found.

26. Choc's story points up one of the features that made the Guatemalan experience of losing children so painful: even if they could be found, not only were they grown strangers, but almost always they had lost their mother tongue, and adopted the identity of a different indigenous or ethnic group. "The experience of being reunited with my daughter made me realize the harm the war did to the whole family. In addition to the death of my wife, [my children] Magdalena and Jose, this violence changed us, made us different from each other. Today my children have other [indigenous or ethnic] identities: Ana is Ladina [Spanish/mestizo], Julia is Q'eqchi, Catarina is Kiché," said Choc, who is Ixil.<sup>39</sup> His children, like

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<sup>38</sup> Liga Guatemalteca de Higiéne Mental, *Corazones*.p. 45.

<sup>39</sup> *Ibid.*, p. 49.

many found by *Todos por el Reencuentro*, had been kidnapped by members of the paramilitary civil patrols (PACs).<sup>40</sup>

27. Another Maya-Ixil man, Pedro Santiago, told of trying to reconstruct a relationship with his daughter in the aftermath of her forced disappearance. In 1984, he and his three-year old daughter Rosa were wounded by the same bullet as he carried her on his back and they were caught in a shower of bullets from soldiers. Both were taken to the hospital, but separately. Rosa was picked up by the military and left in another hospital, while her father searched for her in the first, and she was subsequently adopted by a family from Aguacatán, Huehuetenango. It was twenty-one years before Pedro Santiago saw her again, and she arrived for the reunion with her parents wearing the traditional clothing [traje] of another indigenous group. For Santiago, seeing his daughter in the “wrong” *traje* was an event invested with significance.

“The day that they were coming, early in the morning some of our brothers from the evangelical church came, and all morning we had a musical group and a religious service to give thanks to God for the life of our daughter. My wife and other women from the community started making little tamales really early. I think that they had made a thousand tamales, maybe more. They killed a chicken and made a stew. At about noon three cars arrived. Then we lit fireworks and went to meet Rosa. She arrive wearing *traje* from Aguacatán and her three daughters with *traje* from Cobán. When I saw her...my eyes filled with water and she hugged me. After that my wife received her and her husband. It was a really

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<sup>40</sup>*Ibid.*p. 46.

happy thing and it brought tears from us. Then we began the activities...[they prayed, told stories about their lives]. Afterward, my wife took Rosa inside the house and together with other women they dressed her as an Ixil. For us it is very important that one day little Rosa returns to her traje from Nebaj and I hope that she can learn to speak our language, because now she can't.<sup>41</sup>

28. When Rosa narrated the story from her point of view, she too dwelt on the *traje*, the symbol of her lost Ixil identity.

“When we got there, there were like two hundred people in my parents’ house, they had arranged everything for me. Later I understood that many were my family members. My family sure is big! Many people spoke; my father spoke to everybody in Ixil and Don Pedro [from *Todos*] was translating for us so I could understand; my father told how they shot at us both, but the best was to realize that my family had always loved me and that they too had suffered because of the war. They dressed me in Ixil *traje*; I was nervous but I liked it...in front of everyone they put a wide ribbon through my hair. After that, many of the people who were there came by and greeted me and gave me money, gifts, food. I was very emotional.”<sup>42</sup>

However, distance, poverty, and differences of language prevented them from seeing each other again after that day.

29. In El Salvador, the Catholic Church was actively involved in searching for and documenting, the disappearance of children. In 1989, six Jesuit priests were killed

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<sup>41</sup> Liga Guatemalteca de Higiéne Mental, *Corazones.*, 40-41.

<sup>42</sup> *Ibid.*, pp. 43-44.

in the middle of the night by the military with their with their housekeeper and daughter, were killed. One member of that community, Father Jon Cortina, was away on a pastoral visit to a community, and survived. He went on, five years later, to found *Pro Búsqueda de Niñas y Niños Desaparecidos*, a search group for the children disappeared by the military during the war.<sup>43</sup>

30. With help from the orphanage director, the human rights commission, and members of the Catholic Church, parents and children—mostly grown or in their final years of high school—met again after eleven and a half years. One of the children, Andrea, described that meeting:

“When the children arrived in a microbus at the plaza [in Guarjila] there was a big group of people waiting for us. We got out and, in that moment, the shouting and the hugging began. A tall man hugged [two of the orphanage children] Marta and Angelica so impetuously that his hat fell off. They started weeping too. [Another child] Juan Carolos disappeared into a group of women who all hugged him at the same time.

31. “I didn’t see anybody I knew, and nobody came over to me. Maybe my family had not come after all. I started to feel worried when someone told me that my family had come in [to the plaza] from the street. I don’t remember if it was Father Jon [Cortina], the priest of Guarjila, who told me: “Those are your parents.” I walked toward them. My parents came

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<sup>43</sup> Juan Hernández Pico, "Child Adoption: Another Form of Violence." *Revista Envío*, November 2008 2008. Laura Briggs, "Interview with Jon Cortina, Founder of Pro Búsqueda." San Salvador, El Salvador, July 19, 2005. Asociación pro Búsqueda de Niñas y Niños Desaparecidos, *El Día Mas Esperado* (San Salvador: UCA Editores, 2001).

into the middle [of the plaza] and around them were walking so many children, big and small, who had to be my brothers and sisters. When I saw how much one of my little brothers looked like me, I could not contain my tears. We met at the edge of the little plaza and started to hug.<sup>44</sup>

32. News of the meeting—and that disappeared children had been found alive—spread through rural communities like wildfire. A few months later, in August 1994, families and Cortina founded *Pro Búsqueda* [For Searching]. Within a few years, with the help of DNA testing through groups like Physicians for Human Rights and the hard, slow, sifting and matching of newspaper stories and the archival records of orphanages, *Pro Búsqueda* began finding lost children—in adoptive families in France, in Spain, in the United States.<sup>45</sup>

33. For the “found” children, as well as their families, integrating their experiences and renewing their relationships was frustratingly difficult. After more than a decade of waiting, worrying, and wondering, it was hard to learn that relationships did not just start over where they had left off; often, there was unresolvable pain about how the disappearances themselves had taken place. In Central America in the eighties, militaries and paramilitaries targeted entire

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<sup>44</sup> Pro Búsqueda, *El Día Mas Esperado*, p. 39.

<sup>45</sup> Dalton, "Cicatrices No Cerradas de la Guerra."; Dina Coloma, "El Salvador/Guatemala: ¿Dónde Están Los Niños?" (Where Are the Children?)," Amnesty International, <http://news.amnesty.org/index/ENGAMR020012004>; Andrew Buncombe, "El Salvador's War Children Return to Their Roots," *The Independent*, July 17 2006; Joseph Kahn, "War Child Who 'Disappeared' Finds Her Way Back: Mass. Woman Sees El Salvador Family," *Boston Globe*, April 5 2007; Larry Rohter, "El Salvador's Stolen Children Face a War's Darkest Secret," *New York Times*, August 5 1996; Pro Búsqueda, *El Día Mas Esperado*.

communities, resulting in scenes of murder, mayhem, and anguished flight. As Andrea understood her story, from her parents and her own memory, he disappearances began with event know as the *Guinda de Mayo* (the flight in May [1982]):

“[When the people got to a place called] Los Alvarenga, they couldn’t get out. There were a ton of people, maybe a thousand, hidden in the vegetation of a tiny hill. It was only a question of time before the soldiers found us. Thus, they said that they were going to try to break through the wall [of the military]. The *guerillas* [who were trying to escort the people past the military] started to shoot and the people to run. In order to organize its ambushes, the army had hidden in place where they believed the people would pass. My father had to pass through the middle of the shooting, running with me against his chest and [her sister] Carmen in his arms. My mother ran with [another child] Argelia in her arms and Arturo [the oldest son, ran] with my brother Luis, but with all the people they could not follow my father. The people ran, terrified. The dead fell before them and behind them. The wounded on the ground shouted, “Kill me, please!” because they did not want to continue suffering. In the road, you could see only the dead and wounded and the uproar of the people who fled, while the soldier shot at them. Following an avalanche, my father came to a huge cliff. But the helicopters had arrived. Now they were shooting from the hills and from the air. The people were throwing themselves off the cliff, a fall of many meters. They were falling on top of



each other, hitting each other, shouting in pain. At the edge of cliff, around my father, the dead and the wounded were piled up. Others threw themselves without even looking, as if they didn't realize there was a cliff in front of them. My father thought that if he threw himself holding both girls, we would surely all three die. In this moment, he decided to leave me. He lay me down under a tree [she had been seriously wounded days before by a rocket attack on their community, and couldn't stand] at the edge of the bank, gave me a final kiss, and jumped with my sister in his arms...My father was the one who suffered the most from my loss. He spent months crying and lamenting for having left me. He felt very guilty. Personally, I think he made the correct decision. Nevertheless, it is a decision that no one, no human being, ever should be forced to make, a decision of life or death, save one or the other.”<sup>46</sup>

34. On a practical level, reunion did not resolve loss. Parents' and children's lives had developed trajectories that were not overlapping. Andrea, for example, intended to go to college with help from the orphanage. Although she and her parents and siblings took great pleasure from their meetings, and their subsequent connections, none of the children went to live with their parents again. Seeing each other continued to be important, but finding each other did not heal all the wounds; their lives had taken separate paths for more than a decade. In birth

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<sup>46</sup> Ralph Sprenkels and the Asociación Pro Búsqueda de Niñas y Niños Desaparecidos, eds., *Historias Para Tener Presente: Los Relatos Extraordinarios de Cinco Jóvenes Que Perdieron a Sus Familias y Que, Luego de la Guerra, Las Volvieron a Encontrar* (San Salvador: UCA Editores, 2002), pp. 56-57.

families, new children had been born, sometimes a mother or father had died and the surviving partner had remarried. As *Pro Búsqueda* grew, there was mutual support but also friction and resentment when some families found their children and others did not. All—children, parents of found children, parents of lost children—had been through tremendous upheaval, loss, and trauma. Some had lost children as a result of guerrilla forces, while the majority had lost their children to the army. The strength of pro-Búsqueda, though, was that it simultaneously emphasized political and mental health approaches, and in fact did not see the two as that different from each other. In support groups, participants would try to sort out the political context that gave rise to their own, and others, actions and feelings. Responding to critics who wanted to know why Pro-Búsqueda couldn't just leave the question of lost children alone, so many years after the kidnapping, Jon Cortina spoke in terms of wounds that parents, children, and the society as a whole carried that could not heal until people knew the truth, and justice was done.<sup>47</sup>

35. On March 1, 2005, *pro-Búsqueda* won a significant legal victory in seeing the military held responsible for the kidnapping of children. The military had long insisted that it had only acted in humanitarian ways, picking up lost children and taking them to the Red Cross; under unusual circumstances, raising war orphans

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<sup>47</sup> Dalton, "Cicatrices No Cerradas de la Guerra."; Rosa América Láinez Vilaherrera, Gianina Hasbún Alvarenga, and Asociación pro Búsqueda de Niñas y Niños Desaparecidos, *Tejiendo Nuestra Identidad: Sistematización de la Experiencia del Equipo de Psicología de Pro-Búsqueda* (San Salvador: UCA Editores, 2004).

in military barracks and teaching them skills.<sup>48</sup> In 2005, though, the Inter-American Court of Human Rights issued a decision condemning the Salvadoran government in the case of the Serrano Cruz sisters, Ernestina and Erlinda, who at the ages of 2 and 7 were taken from their family at gunpoint during the military's "Operacion Limpieza" (Operation Clean-Up) in 1982. As they watched, family members said, soldiers took the little girls into a military helicopter, which flew away and disappeared. The girls have never been found, nor have the individuals responsible been identified. Their mother initiated the case, but did not live to see its fruition, but their sister, Suyapa, was able to testify in her stead. The Salvadoran government, for its defense, suggested that the girls never existed—the logical culmination of the process of "disappearance." The court ordered the Salvadoran government to apologize to the family, to make monetary restitution, to open the military archives to searchers, and to develop a state-level organization to find Salvador's lost children.<sup>49</sup> The government ignored the court order.

36. Most of the leadership of the Guatemalan and Salvadoran militaries in these decades were trained by the U.S. military and intelligence in counterinsurgency.<sup>50</sup>

There is no clear evidence on way or another about whether this was a tactic

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<sup>48</sup> Rohter, "Salvador's Stolen Children."

<sup>49</sup> Juan José Dalton, "Ante la Corte Interamericana," *Proceso*, 22 marzo 2005; Dalton, "Cicatrices," *Proceso*, 25 October 2003; Juan José Dalton, "El Salvador: La Deuda Con Los Niños Desaparecidos," *Proceso*, 8 March 2003; Marcelo Izquierdo, "Abuelas de la Plaza de Mayo: 25 Años de Búsqueda," *Proceso*, 25 October 2002.

<sup>50</sup> Greg Grandin, *Empire's Workshop: Latin America, the United States, and the Rise of the New Imperialism* (New York: Metropolitan, 2006).

promoted by the United States, and hence whether it was directly modeled on boarding school policy, or only copied.

37. The children that lived through the Guatemalan and Salvadoran governments' policy of child separation were born in the 1970s and eighties. They are the generation of the parents and grandparents of children currently being separated at the United States border.

# Exhibit 49

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7 **UNITED STATES DISTRICT COURT**  
8 **WESTERN DISTRICT OF WASHINGTON**  
9 **AT SEATTLE**

10 STATE OF WASHINGTON, *et al.*,

11 Plaintiffs,

12 v.

13 DONALD TRUMP in his official capacity  
14 as President of the United States, *et al.*,

Defendants.

NO. 2:18-cv-00939 - MJP

DECLARATION OF  
MARTHA S. JONES

15 I, Martha S. Jones, declare as follows:

16 1. I am over the age of 18 and have personal knowledge of all the facts stated herein.

17 2. I joined the Johns Hopkins University Krieger School of Arts and Sciences  
18 Department of History on June 1, 2017 as the Society of Black Alumni Presidential Professor  
19 and Professor of History. I came from the University of Michigan College of Literature, Science,  
20 and the Arts where I was a Presidential Bicentennial Professor, Professor of History and  
21 Afroamerican and African Studies. I was a founding director of the Michigan Law School  
22 Program in Race, Law & History and a senior fellow in the Michigan Society of Fellows. I hold  
23 a Ph.D. in history from Columbia University and a J.D. from the City University of New York  
24 School of Law. My curriculum vitae, a true and correct copy of which is attached as Exhibit A,  
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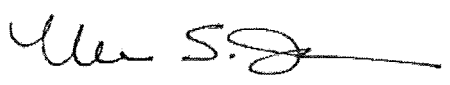
further details my qualifications and lists all of the publications I have authored in the previous 10 years.

3. A true, correct and complete statement of my opinions, the bases and reasons for them, and the facts and data I considered in forming them is attached as Exhibit B.

4. I am being paid \$1,000 for my study and testimony in this case.

I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

DATED this 2nd day of July, 2018 at Paris, France.

  
\_\_\_\_\_  
Martha S. Jones

# Exhibit A



**MARTHA S. JONES**

Society of Black Alumni Presidential Professor  
Professor of History  
Johns Hopkins University  
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410-516-7575. msjonz@jhu.edu  
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ACADEMIC APPOINTMENTS

Johns Hopkins University, Krieger School of Arts and Sciences. Baltimore, Maryland.  
SOBA (Society of Black Alumni) Professor of History. 2017-present.  
Gilder-Lehrman Institute of American History, Summer Teacher's Institute, NY. 2002-present.  
Instructor, Reconstruction: America's Unfinished Revolution (with Eric Foner).  
University of Michigan, College of Literature, Science and Arts. Ann Arbor, MI. 2001- 2017.  
Presidential Bicentennial Professor. 2016-2017.  
Arthur F. Thurnau Professor. 2013-2017.  
Professor of History and Afroamerican and African Studies. 2015-2017.  
Associate Professor of History and Afroamerican and African Studies. 2007-2015.  
Assistant Professor of History and Afroamerican and African Studies. 2001-2007.  
University of Michigan Law School, Ann Arbor, MI. 2004-2017.  
Affiliated LSA Faculty. 2010-2017.  
Visiting Professor of Law. 2008-2017.  
Visiting Assistant Professor of Law. 2004-2007.  
École des Hautes Études en Sciences Sociales (EHESS), Paris, France. 2006, 2007 & 2009.  
Directrice d'Études Invitée.  
Barnard College. New York, NY. 2000-2001.  
Visiting Assistant Professor of History.  
New School University, Eugene Lang College. New York, NY. 1997-2001  
Adjunct Lecturer.

EDUCATION

COLUMBIA UNIVERSITY, New York, NY  
Ph.D. History 2001; M. Phil. History 1998; M.A. History 1997.  
CITY UNIVERSITY OF NEW YORK (CUNY) SCHOOL OF LAW, Queens, NY  
J.D. 1987.  
HUNTER COLLEGE, New York, NY  
B.A. 1984.

HONORS AND AWARDS (selected)

Berkshire Conference of Women Historians. Co-President. 2017-present.  
Organization of American Historians. Executive Committee. 2017-present.

William L. Clements Library. Board of Governors. Member. 2018-present.  
Organization of American Historians. Distinguished Lecturer. 2010-present.  
Princeton University. Program in Law and Public Affairs. Fellow. 2017-18. (declined.)  
Harvard University. Radcliffe Institute for Advanced Study. Fellow. 2016-17. (declined.)  
University of Michigan. Presidential Bicentennial Professor. 2016-2017.  
Michigan Society of Fellows. Senior Fellow. 2015-2017.  
National Humanities Center. William C. and Ida Friday Fellow. 2013-14.  
American Council of Learned Societies. Fellow. 2013-14  
University of Michigan. Arthur F. Thurnau Professorship. 2013-2017.  
University of Michigan. Harold R. Johnson Diversity Service Award. 2011.  
University of Michigan. Office of the Vice President for Research. Michigan Humanities Award. 2010-11.  
Columbia University. Center for the Critical Analysis of Social Difference. Visiting Fellow. 2009-11.  
University of Michigan. Eisenberg Institute for Historical Studies. Faculty Fellow. 2009-2010.  
University of Pennsylvania Law School and the National Constitution Center. Visiting Scholar. 2008.  
Gilder-Lehrman Institute Fellowship in American History. Research Fellowship. 2003-04.  
The Library Company of Philadelphia and Historical Society of Pennsylvania. Research Fellowship. 2003-04.  
University of Michigan. Institute for the Humanities. Michigan Faculty Fellowship. 2003-04.

## BOOKS

*Birthright Citizens: A History of Race and Rights in Antebellum America* (New York: Cambridge University Press, 2018.)  
*All Bound Up Together: The Woman Question in African-American Public Culture, 1830-1900* (University of North Carolina Press, 2007.)

## EDITED VOLUMES

Editor. *Toward an Intellectual History of Black Women*, eds. Mia Bay, Farah J. Griffin, Martha S. Jones and Barbara D. Savage. (University of North Carolina Press, 2015.)  
Guest editor. *Proclaiming Emancipation. Journal of the Civil War Era*. 3, no. 4 (December 2013.)  
Editor. *Women & Performance: A Journal of Feminist Theory. Special Issue: Pass\*ing*. Co-editor, with John L. Jackson, Jr. 29, no. 1 (Fall 2005.)

## ARTICLES (selected)

“Navigating Free Black Citizenship: Port City Encounters from Baltimore to Rio de Janeiro,” in Whitney Stewart and John Marks, eds. *Race and Nation in the Age of Emancipations* (University of Georgia Press, 2018.)  
“Forgetting the Abolition of the Slave Trade in the United States: How History Troubled Memory in 2008.” *Distant Ripples of the British Abolitionist Wave? Africa, the Americas and Asia*, eds. Myriam Cottias and Marie Jeanne Rossignol (Trenton, NJ: Africa World Press Tubman Institute Series, 2018.)  
“Birthright Citizenship and Reconstruction’s Unfinished Revolution,” in Forum: The Future of Reconstruction Studies, *Journal of the Civil War Era* 7, no. 1 (March 2017): 10.  
“False Starts, Missed Opportunities, and a Pioneering Historian,” *The Quarto* 46 (Fall-Winter 2016.)  
“First the Streets, Then the Archives,” *American Journal of Legal History* 56, no. 1 (March 2016): 92-96.

- “Marin et citoyen : être noir et libre à bord des navires états-uniens avant la Guerre civile.” *Le Mouvement Social* 3 (2015): 93-112.
- “Histories, Fictions, and Black Womanhood Bodies: Rethinking Race, Gender, and Politics in the Twenty-First Century.” *Toward an Intellectual History of Black Women*, eds. Mia Bay, Farah Griffin, Martha S. Jones and Barbara D. Savage (University of North Carolina Press, 2015.)
- “History and Commemoration: The Emancipation Proclamation at 150.” *Journal of the Civil War Era*, 3, no. 4 (December 2013): 452-457.
- “Emancipation’s Encounters: Seeing the Proclamation Through Soldiers’ Sketchbooks.” *Journal of the Civil War Era*, 3, no. 4 (December 2013): 533-548.
- “*Hughes v. Jackson*: Race and Rights Beyond *Dred Scott*.” 91, no. 5 *North Carolina Law Review* (June 2013): 1757-1783.
- “The Case of *Jean Baptiste, un Créole de Saint-Domingue*: Narrating Slavery, Freedom, and the Haitian Revolution in Baltimore City.” Chapter 5 in *The American South and the Atlantic World* eds. Brian Ward, Martin Bone, and William A. Link (Gainesville: University Press of Florida, 2013): 104-128.
- “Historians’ Forum: The Emancipation Proclamation.” (with Kate Masur, Louis Masur, James Oakes, and Manisha Sinha.) 59, no. 1 *Civil War History* (March 2013.)
- “Time, Space, and Jurisdiction in Atlantic World Slavery: The Volunbrun Household in Gradual Emancipation New York.” *Law and History Review* 29, no 4 (November 2011): 1031-1060.
- “Overthrowing the ‘Monopoly of the Pulpit’: Race and the Rights of Churchwomen in Nineteenth Century America.” *No Permanent Waves: Recasting Histories of U.S. Feminism*, ed. Nancy Hewitt (New Brunswick, NJ: Rutgers University Press, 2010.)
- “Leave of Court: African-American Legal Claims Making In the Era of *Dred Scott v. Sandford*.” *Contested Democracy: Politics, Ideology and Race in American History*, eds. Manisha Sinha and Penny Von Eschen (New York: Columbia University Press, 2007.)
- “Make us a Power”: African-American Methodists Debate the Rights of Women, 1870-1900.” *Women and Religion in the African Diaspora*, eds. R. Marie Griffith and Barbara D. Savage. (Baltimore, MD: Johns Hopkins University Press, 2006).
- “Perspectives on Teaching Women’s History: Views from the Classroom, the Library, and the Internet,” *Journal of Women’s History* 16, no. 2 (Fall 2004): 143-176.

#### ESSAYS and COMMENTARY (selected)

- “I Had a Dream About You Last Night – A Sexual Dream?: Women Have Heard It All,” *Chronicle of Higher Education*. April 2018.
- “Trump Said Protesting NFL Players ‘Shouldn’t Be in This Country,’” *Washington Post*, May 2018.
- “Demoting ‘Maryland, My Maryland’ Ends a Struggle Begun by Black Baltimoreans in 1863,” *History News Network*, April 1, 2018.
- “Michelle Obama and the Black Women of the White House,” *Washington Post*. February 2018.
- “The Blood is in the Details: When Scars of Slavery are Markers of Freedom.” *Muster: The Blog of the Journal of the Civil War Era*. December 1, 2017.
- “Why Calling Elizabeth Warren ‘Pocahontas’ is a Slur Against All Mixed-Race Americans.” *Washington Post*. November 29, 2017.
- “What Mark Lilla Gets Wrong About Students.” *The Chronicle Review*. August 2017.
- “The 14th Amendment Solved One Citizenship Crisis, but it Created a New One.” *Washington Post*. July 2017.

“Before Frederick Douglass: William Watkins Speaks for Black Americans on Independence Day. July 4, 1831.” Medium. July 4, 2017.

“At the University of Michigan, Confronting Controversy to Move Forward.” Detroit Free Press. April 2017.

“Ava Duvernay’s 13<sup>th</sup>: It’s About Hope, Not History.” Medium. October 30, 2016.

“Are There New Lives for Old Objects at the National Museum of African American History and Culture?” Muster: The Blog of the Journal of the Civil War Era. October 2016.

“Thurgood Marshall and His Hometown Courthouse.” We’re History. July 2016.

“The Color of History.” Color Code: The Exhibition Catalog (Ann Arbor: University of Michigan Department of Afroamerican and African Studies, 2016.)

“Julian Bond’s Great-Grandmother a “Slave Mistress?: How the New York Times Got it Wrong.” History News Network. August 2015.

“We Are the Intellectuals.” Roundtable: Toward an Intellectual History of Black Women.” African-American Intellectual History Society Blog. June 5, 2015.

“On The Cherokee Rose, Historical Fiction, and Silences in the Archives.” Process: The Blog of the Organization of American Historians. May 26, 2015.

“Who Here is a Negro?” Michigan Quarterly Review. 53, no. 1 (Winter 2014): 23-28.

“Why We Still Need “Black History Month, Even Though #28DaysAreNotEnough.” CNN. February 25, 2015.

“From Michael Stewart to Michael Brown: A Reflection on #FergusonOctober.” *Huffington Post*. November 14, 2014.

“Supreme Court Ruling Upholds America's Mixed View.” CNN. April 24, 2014.

“Who Here is a Negro?” *Michigan Quarterly Review*. 53, no. 1 (Winter 2014): 23-28.

“When it Comes to Diversity, Who Counts?” *Huffington Post*. March 26, 2014.

“What’s in a Name? Mixed, Biracial, Black.” CNN. February 19, 2014.

“Biracial, and also Black.” CNN. February 12, 2014.

“History, Myth and the Emancipation Proclamation.” *Proclaiming Emancipation: The Exhibition Catalogue* (Ann Arbor, MI: The William L. Clements Library, 2013.)

“Turning Back the Time of Racism.” *Huffington Post*. February 12, 2013.

“Understanding Race.” *Huffington Post*. February 5, 2013.

“A Bellwether: Phil Lapsansky at the Library Company of Philadelphia.” *Phil Lapsansky: Appreciations* (Philadelphia, PA: Library Company of Philadelphia, 2012.)

“Edward Clay’s Life in Philadelphia.” *An Americana Sampler: Essays on Selections from the William L. Clements Library*, eds. Brian Leigh Dunnigan and J. Kevin Graffagnino (Ann Arbor, MI: The William L. Clements Library, 2011).

“Reflections of an Archive Rat.” (Ann Arbor, MI: The William L. Clements Library, 2009.)

“Reframing the Color Line.” *Reframing the Color Line: The Exhibition Catalog* (Ann Arbor, MI: The William L. Clements Library, 2009.)

“Learning a Pedagogy of Love: Thomas Merton.” *Living Legacies at Columbia*, ed, Wm. Theodore de Bary (New York: Columbia University Press, 2006.)

“Mining Our Collective Memory: Beyond the Academic-Activist Divide in Black Studies,” *Souls: A Critical Journal of Black Politics, Culture, and Society*. 6, no. 3/4 (October 2004): 71-76.

## CURATORIAL EXPERIENCE

- “Stumbling Blocks.” University of Michigan President’s Bicentennial Colloquium on the Future University Community. May 2017. Creator and curator.
- “The Arabella Chapman Project.” [www.arabellachapman.com](http://www.arabellachapman.com). June 2015.
- “Proclaiming Emancipation.” The William L. Clements Library. Ann Arbor, Michigan. October 2012-February 2013. Co-curator, with Clayton Lewis.
- “Revolution: The Atlantic World Reborn.” New-York Historical Society. November 2011-April 2012. Historical advisor.
- “Reframing the Color Line: Race and the Visual Culture of the Atlantic World.” The William L. Clements Library. Ann Arbor, Michigan. October 2009 –February 2010. Co-curator, with Clayton Lewis.
- “And Still We Rise” (permanent exhibition.) The Charles H. Wright Museum of African American History. Detroit, Michigan. 2003. Historical advisor.

## BOOK REVIEWS

- “Review of *Redemption Songs: Singing for Freedom before Dred Scott* by Lea Vandervelde, in *Law & History Review* 33, no. 4 (November 2015): 1009-1011.
- “Review of *Encountering Revolution: Haiti and the Making of the Early Republic* by Ashli White,” in *Slavery & Abolition* 33, no 1 (March 2012): 187-189.
- “Review of *What Blood Won’t Tell: A History of Race on Trial* by Ariela J. Gross,” in *Law & Society Review* 44, no. 3-4 (September/December 2010): 877-79.
- “Review of *Sarah Johnson’s Mount Vernon: The Forgotten History of an American Shrine* by Scott E. Casper,” in *The American Historical Review*, 114, no. 5 (December 2009).
- “Review of *‘We Are Coming’: The Persuasive Discourse of Nineteenth-Century Black Women* by Shirley Wilson Logan,” in *Gender & History*. 16, no. 1 (April 2004).
- “Review of *Disciples of Liberty: The African Methodist Episcopal Church in the Age of Imperialism, 1884-1916* by Lawrence Little.” *The North Star: A Journal of African-American Religious History*, 7, no. 2 (Spring 2004).
- “Review of *Come Shouting to Zion: African American Protestantism in the American South and British Caribbean To 1830* by Sylvia Frey and Betty Wood,” in *The North Star: A Journal of African-American Religious History*, I, no. 2 (Spring 1998).

## INVITED PRESENTATIONS (selected)

### 2018

- “Belonging.” Commencement Address. University of Michigan, Flint. May.
- “A New History of the 14<sup>th</sup> Amendment: Birthright Citizens.” National Constitutional Center. April.
- “Birthright Citizens.” University of Connecticut. April.
- “George Hackett’s Journey to Birthright Citizenship.” University of Texas, Dallas. Dallas, TX. April.
- “Citizenship: Race, Gender, and Foreignness.” Radcliffe Institute, Harvard University. Cambridge, MA. April.
- “Walking Roger Taney’s Walk: Memory and the Notorious.” Duke University. Durham, NC. March.
- “Slavery and Memory: Remembering and Forgetting Enslavement in Popular Culture, Law, and the University: Comment.” International Association of Inter-American Studies. Coimbra, Portugal. March.

“Which Marriage is a “Black” Marriage: Rethinking the Color Line in Tera Hunter’s *Bound in Wedlock*,” Red Emma’s Bookstore. Baltimore, MD. March.

“Birthright Citizens.” University of Georgia. Athens, GA. February.

“Who Are We? Who Might We Want to Become as Historians?” Yale University. New Haven, CT. February.

“History, Memory, and a Pseudo-Confederate Past: Taking Down Monuments in Baltimore City,” Roger William School of Law. Bristol, RI. January.

## 2017

“Confederates, Monuments, and the Curious Case of Baltimore’s Roger B. Taney.” Ecole des Hautes Etudes en Sciences Sociales. December.

“Birthright Citizens: Winner and Losers in the Long History of the 14<sup>th</sup> Amendment.” Notre Dame Law School. November.

“The Power of History; The Urgency of Now.” Yale University, Gilder-Lehrman Center for the Study of Slavery, Resistance, and Abolition,” November.

“What is Justice in the Case of Celia, A Slave?” Historians Against Slavery UK. October.

“Confederates, Monuments, and the Curious Case of Baltimore’s Roger B. Taney.” Duke University, Center for Scholars and Publics. September.

“The Changing Face of Higher Education.” National Association of College and University Business Officers Annual Meeting. August.

“Toward an Intellectual History of Black Women...and Back.” Keynote. Conservative/Progressive Summit. Hauenstein Center, Grand Valley State University. May.

“Threats of Removal.” University of Miami School of Law. April.

“Writing Black Women’s Intellectual History.” Tulane University. March.

“Toward an Intellectual History of Black Women.” With Tiya Miles and Megan Sweeney. Institute for Research on Women and Gender. University of Michigan. January.

“Threats of Removal.” Rutgers School of Law. January.

## 2016

“Threats of Removal.” University of Virginia Law School. November.

“Finding William Yates.” History Department. University of Pennsylvania. November.

“To See and be Seen: A Tribute to Mary Frances Berry,” Plenary. Association for the Student of African American Life and History. October.

“Threat of Removal,” History Department. Johns Hopkins University. October.

“A History of the South: Colonization, Birthright and the Rights of Black Americans.” History Department. University of North Carolina, Chapel Hill. September.

“Wade in the Water,” Bennett College. September.

“Fugitivity, Irredeemability, and the Law of Black Boyhood,” Law and Humanities Junior Scholar Workshop. UCLA School of Law. June.

“Seeing Slavery in the Juridical Archive: Signatures and Signs.” Le Centre de Recherches sur le Brésil Colonial et Contemporain. École des Hautes Études en Sciences Sociales (EHESS), Paris. May.

“Birthright Citizens: Race and Rights in Antebellum America.” Centre international de recherches sur les esclavages. École des Hautes Études en Sciences Sociales (EHESS). Paris, France. May.

“The Color of History.” Marking Race, Making History: A Conference in Celebration of the Career of Thomas Hot. University of Chicago. April.

"Birthright Citizens: Race and Rights in Antebellum America." University of Wisconsin Law School. March.  
 "The Children of Loving v. Virginia: Law and Mixed Race Identity." Sciences Po (Paris.) March.  
 "Celia, A Slave: The History and Memory of Slavery and Sexual Violence." William Woods College. March.  
 "#SayHerName: Celia and the History of Slavery and Sexual Violence." University of Missouri. March.  
 "The Children of Loving v. Virginia: Law and Mixed Race Identity." University of Southern California (USC) Program in Law, Culture and the Humanities. March.  
 "Birthright Citizens: A History of Race and Rights in Antebellum America." University of Southern California Law School. March.  
 "Birthright Citizens: Race and Rights in Antebellum America." University of Detroit Mercy. February.  
 "The Criminalization of Poverty: An Origins Story." University of Michigan Law School. February.  
 "The Cherokee Rose: A Conversation with Tiya Miles." University of Michigan Library. January.

#### 2015

"What is the Color of History?" Multiracial in a Monoracial World, University of Michigan Library. 2015.  
 "Red, White and Black: Writing a History of Mixed Race Identity." John Hope Franklin at 100. Duke University. November.  
 "Showdown & Thurgood Marshall." With Will Haygood. Literati Booksellers. October.  
 "Landmark Cases: Dred Scott v. Sanford." CSPAN. October.  
 "Comment on Tomlins Freedom Bound." North American Labor History Annual Conference. 2015.  
 "Overturning Dred Scott." Association for the Study of Afroamerican Life and History Annual Meeting. September.  
 "The Children of Loving v. Virginia." Franklin College. Franklin, Indiana. September.  
 "The Arabella Chapman Project." University of Michigan EIHS. September.  
 "Toward an Intellectual History of Black Women." Vineyard Haven Public Library. August.  
 "Toward an Intellectual History of Black Women." CIRES (Paris.) June.  
 "Birthright Citizens." Columbia University Reid Hall (Paris.) June.  
 "Comment on Elijah Anderson's The Cosmopolitan Canopy." CNRS Pouchet (Paris.) June.  
 "Family, History, and Writing the Past of Mixed-Race Identity." Organization of American Historians. April.  
 "Silence and Slavery's Shards. Allure of the Judicial Archives." University of Michigan Law School. April.  
 "Reparation: A Conversation with Ta-Nehisi Coates." Duke University. March.  
 "Love and the Ethics of Law Practice". Keynote. Juan Tienda Dinner. University of Michigan Law School. March.  
 "Navigating Free Black Citizenship: Port City Encounters from Baltimore to Rio de Janeiro." Keynote. Reperiodizing Latin America's Nineteenth Century. Yale University. New Haven, CT. February.  
 "Black Women, Law, and the Politics of Pleasure." Shondaland Symposium. Duke University. January.  
 "Children of Loving v. Virginia: Living at the Intersection of Law and Mixed-Race Identity." Martin Luther King, Jr. Day Address. University of Michigan Law School. January.

#### 2014

"The State of Missouri v. Celia, a Slave: A History of Slavery and Sexual Violence." CSPAN American History TV. October 2014.  
 "Navigating Free Black Citizenship: From Baltimore to Valparaiso." Circulation des Catégories Juridiques et des Catégories Racial dans l'Espace Atlantique. École des Hautes Études en Sciences Sociales (EHESS), Paris, France. June.

“The Slaves’ Emancipation: How Lincoln’s Proclamation Became Law.” City College of New York. New York, NY. June.

“Rights that Cannot be Annulled”: Travel, Guns, and the Possibilities of Black Laws in Baltimore City.” American Bar Foundation. Chicago, IL. May.

“Reading Kara Walker as Historian.” St. Louis Museum of Art. St. Louis, MO. May.

“Rights that Cannot be Annulled”: Travel, Guns, and the Possibilities of Black Laws in Baltimore City.” Johns Hopkins University Department of History. Baltimore, MD. April.

““One hand upon the Constitution and the other upon the Discipline of the Church”: Church, State, and Citizenship in Antebellum Baltimore.” Duke University Law School. Durham, NC. March.

“The Politics of Privacy: Black Women and the Culture of Dissemblance.” University of Michigan. Honors Convocation. March.

“Civil Rights 2014.” Black History Month Keynote. Bennett College for Women. Greensboro, NC. February.

“Navigating Free Black Citizenship: Port City Encounters from Baltimore to Rio de Janeiro.” Race and Nation in the Age of Emancipation. Rice University, Houston, TX. February.

### 2013

“Hughes v. Jackson: Race and Rights Beyond Dred Scott.” Duke University Law School. Durham, NC. November.

Citizenship Before Birthright: The Puzzle of Free African Americans Prior to the 14th Amendment.” National Humanities Center. Durham, NC. November.

“Emancipation as Translation: How Lincoln’s Proclamation Became Law.” Center for the Study of Slavery and Justice. Brown University. Providence, RI. November.

“Overturning Dred Scott: Race, Rights, and Citizenship in Antebellum America.” Triangle Legal History Seminar. Research Triangle Park, NC. October.

“The Illogics of Race and Law in the Nineteenth Century United States.” University of Nantes (France.) June.

“Popote: A Life History of Slavery and Law and the Haitian Diaspora.” École des Hautes Études en Sciences Sociales. May.

“Governing the Free Black Family: Reflections on Scenes from Antebellum Baltimore.” Center for African American Studies. Princeton University. April.

“One hand upon the Constitution and the other upon the Discipline of the Church”: Church, State, and Citizenship in Antebellum Baltimore Religion Department. Princeton University. February.

### 2012

“The Illogics of Race and Law in the Nineteenth Century United States.” Systèmes de castes et systèmes esclavagistes, Fondation Maison des Sciences de l’Homme (FMSH,) Paris. France. December.

“Hughes v. Jackson: Race and Rights Beyond Dred Scott.” Race Law Trials. University of North Carolina Law School. October.

“Leave of Court: Race and the Right to Interstate Travel in the Era of Dred Scott.” Borders and Belonging Sawyer Seminar. Rutgers University. October.

“Emancipation’s Encounters: Seeing the Proclamation Through Soldiers’ Sketchbooks.” Proclaiming Emancipation. University of Michigan. October.



- “Popote: A Life History of Slavery and Law and the Haitian Diaspora.” Early American Biographies. The Omohundro Institute and the University of Southern California-Huntington Library Early Modern Studies Institute. The Huntington Library. Los Angeles, CA. June 2012.
- “Re-enslavement and the Saint-Domingue Diaspora.” Duke University Haiti Lab. Durham, NC. March 2012.
- “The Right to Travel: From the Baltimore City Courthouse to the US Supreme Court.” Black History Month Meeting. Library Company of the Baltimore Bar. Baltimore, MD. February 2012.

#### 2011

- “Slave or Free?: Tracing Generations Through the Diaspora of Saint-Domingue/Haiti.” Keynote Address. Berkshire Conference on the History of Women. Amherst, MA. June.
- “Mulattoes and Other Tragedies in a Post-Obama America.” University of Nottingham Law School. March.
- “Writing the History of Slavery From the Artifacts of Law: A Perspective From the Local Courthouse.” Représentations de l’escalvage dans les Amériques (1763-1865.) UFR d’Études Anglophones, Université Paris-Diderot. February.
- “Reframing the Color Line: Race and Visual Culture in the Atlantic World.” École des Hautes Études en Sciences Sociales (EHESS.) February.
- “Court House Stories: The Everyday Life of Freedom.” With Liberty and Justice for All Martin Luther King, Jr. Day Lecture. Henry Ford Museum. January.

#### 2010

- “Rituals of Rights in the Discharge of Debts: Overturning Dred Scott v. Sandford in Baltimore City.” Faculty Workshop. University of Southern California Law School. October.
- “Bearing Arms in Baltimore City: From Claims-making to Citizenship in the Era of Dred Scott.” Center for Law, History and Culture, University of Southern California Law School. October.
- “Time, Space, and Jurisdiction in Atlantic World Slavery: Freeing “French Negroes” in New York’s Era of Gradual Emancipation,” Department of History. University of Southern California. October.
- “The Case of *Jean Baptiste, un Créole de Saint-Domingue*: Narrating Slavery, Freedom, and the Haitian Revolution in Baltimore City.” “W[h]ither the Atlantic World?: Understanding the American South in Transatlantic Context.” Understanding the South, Understanding America Network. Clare College. Cambridge University. May.
- “I was born in... Croix-des-Bouquets”: Time, Space, and Jurisdiction in Gradual Emancipation New York.” Haiti and History. Center for History and Economics. Harvard University. May.
- “The Case of *Jean Baptiste, un Créole de Saint-Domingue*: Narrating Slavery, Freedom, and the Haitian Revolution In Baltimore City.” Legal History Colloquium. New York University School of Law. April.
- “Arming Black America: Race and Citizenship in the Era of *Dred Scott v. Sandford*.” Remaking Heritage Series. Institute for the Humanities. University of Michigan. February.
- “Rituals of Rights in the Discharge of Debts.” New York University, Department of History. New York, NY. January.
- “Rituals of Rights in the Discharge of Debts.” Legal Theory Workshop. University of Michigan Law School. January.
- “Remembering Lincoln in African American Visual Culture.” Lincoln in American Culture's Collective Memory. The Ginsberg Center Arts of Citizenship Program and the University Musical Society. University of Michigan. January.
- “Race and National Memory in the Era of Barack Obama.” 23<sup>rd</sup> Annual Martin Luther King Day Celebration. University of Michigan. January.

## 2009

- “Rituals of Rights and the Discharge of Debts.” Washington University in St. Louis School of Law. St. Louis, MO. November.
- “I was born in...Croix-des-Bouquets”: Time, Space, and Jurisdiction in Gradual Emancipation New York.” Legal History Workshop. University of Michigan Law School. September.
- “I was born in...Croix-des-Bouquets”: Time, Space, and Jurisdiction in Gradual Emancipation New York.” American History Workshop. New York University. September.
- “Overthrowing the ‘Monopoly of the Pulpit’: Race and the Rights of Churchwomen in Nineteenth Century America.” Transregional Perspectives on Religion, Race, and Gender in History. University of Erfurt, Erfurt, Germany. June.
- “Confessions of an ‘Archive Rat’: The Many Histories of a Library.” Founder’s Day. The William L. Clements Library. University of Michigan. Ann Arbor, MI. April.
- “I was born in...Croix-des-Bouquets”: Space, Time, and Jurisdiction in Atlantic World Slavery.” Department of History. Emory University. March.
- “From Toussaint to Soulouque: Envisioning Haiti in Civil War-Era America.” Museum of Southern History Symposium on Southern History: The South and the World in the Civil War Era. Rice University, Houston, TX. February 2009.

## 2008

- “The Politics of Reconstruction: The Intersections of Race and Gender, Then and Now.” The National Constitution Center. Philadelphia, PA. November.
- “I was born in...Croix-des-Bouquets”: Space, Time, and Jurisdiction in Atlantic World Slavery.” Department of History. University of Maryland. November.
- “Overturning *Dred Scott v. Sandford*: Everyday Histories of Race and Rights in American Legal Culture.” University of Pennsylvania Law School. September.

## 2007

- “La Question des Femmes dan la Culture Afroaméricaine.” Colloque Procréation et Démocratie: Grande-Bretagne, États-Unis, France.” UFR d’Études Anglophones – LARCA. Université Paris 7-Denis Diderot. December.
- “The Case of *Jean Baptiste, Créole de Saint-Domingue*: Writing the History of Slaves from the Artifacts of Law.” Histoire(s) atlantique(s) : L’Atlantique des Français, des Espagnols et des Américains. Université Paris 7-Denis Diderot. June.
- “Right Is Of No Sex”: 1848 and the African American Framing of Women's Rights.” Sociohistoire des Pratiques Culturelles (XVI-XVIII siècle.) École des Hautes Études en Sciences Sociales (EHESS.) May.
- “The Case of Jean Baptiste, un Créole de Saint-Domingue: Writing the History of Slaves from the Artifacts of Law. Micro-Histoire et Histoires de Vie d’Esclaves. RTP-Esclavages. Paris, France. May.
- “The Haitian Revolution in History and Memory: Surrogation, from Habitation Drouillard to Project Drouillard.” Law and Political Development in Modern America. University of Pennsylvania Law School and University of Chicago. Legal History Consortium. February.
- “Finding the Juridical Agency of the Enslaved: The Case of *Jean Baptiste, Créole de Saint-Domingue*.” Columbia University, Department of History. January.

## CONFERENCE PRESENTATIONS (selected)

### 2018

- “Black Women Rewrite the History of Women’s Suffrage.” Organization of American Historians. Sacramento, CA. April 2018.
- “Birthright Citizens.” American Association of Law Schools (AALS), Constitutional Law and Legal History Sections Keynote. San Diego, CA. January.
- “History, Fiction, and the Space in Between: Writing Histories of the Self.” American Historical Association. Washington, DC. January.

### 2017

- “Reading Cooper’s Beyond Respectability.” National Women’s Studies Association. November 2017.
- “Reflections on Brophy’s Court, University, and Slave.” Southern Historical Association. November 2017.
- “Slavery and Film: The Long Shadow of Birth of a Nation.” Society for Cinema and Media Studies. March 2017.
- “Comment: Biography: An Evolving and Innovative Methodology for African American Intellectual History.” African American Intellectual History Society. Vanderbilt University. Nashville, TN. March 2017.
- “Comment: African American Intellectuals in the Atlantic World: Challenging Social, Political, and Intellectual Boundaries.” African American Intellectual History Society. Vanderbilt University, Nashville, TN. March 2017.
- “The Two Stories of William Yates.” Emancipation Proclamations. CUNY Graduate Center and University of Pennsylvania McNeil Center. February 2017.

### 2016

- “Citizenship During Emergency: Birthright in the 19<sup>th</sup> Century United States. American Society for Legal History. November.

### 2015

- "Shards and Silence in Slavery's Archive." American Society for Legal History. November.
- "Abigail's Story: Slavery, History and Memory in France and the US." Association for the Study of Afroamerican Life and History. September.
- "Enslaved Women Waging Law in the Nineteenth-Century American South." SHEAR Annual Meeting. July.
- "We Are the Intellectuals." CAAR Bi-Annual Meeting, Liverpool. June.
- “Beyond Mulatto: How to Write the History of Our Mixed-Race Past, and Present.” Organization of American Historians. St. Louis, MO. April.
- “The Children of Loving v. Virginia: Living at the Intersection of Law and Mixed-Race Identity.” Martin Luther King, Jr. Day Lecture. University of Michigan Law School. Ann Arbor, MI. January.
- “Finding Our Truths in the Judicial Archive.” American Historical Association. New York, NY. January.
- “No Straight Line: Reflections on the JD-PhD Track.” American Historical Association. New York, NY. January.

## 2014

- “Beyond the Bi-Racial South: How to Re-Tell Our Mixed-Race Past.” Southern Historical Association. Atlanta, GA. November.
- “Writing the History of Race and Citizenship: Who Wrote Yates’ *Rights of Colored Men*, and Why Does it Matter?” Black Historians and the Writing of History in the 19th and early 20th centuries: What Legacy? University Paris Diderot. Paris, France. June.

## 2013

- “Proclaiming Emancipation: Interpreting Slavery’s Abolition through Visual Culture.” Law and Society Association Annual Meeting. Boston, MA. June.
- “Writing and Rewriting a Past: Lost Histories of Free People of Color in New Orleans.” (comment.) American Historical Association Annual Meeting. New Orleans, LA. January.
- “Law, Geography, and the Limits of Imperial Jurisdiction in the Colonial Caribbean.” (comment.) American Historical Association Annual Meeting. New Orleans, LA. January.

## 2012

- “Transforming American Advocacy: Race, Gender, and Local Courts in the Twentieth Century.” (comment.) American Society for Legal History. St. Louis, MO. November.
- “Popote: A Life History of Slavery and Law and the Haitian Diaspora.” Organization of American Historians Annual Meeting. April.

## 2011

- “A Tragedy of Metissage? Mulattoes in US Law and Culture.” (comment.) American Studies Association. Baltimore, MD. October.
- “Citizenship as Contestation in the Era of Dred Scott.” Association for the Study of Law, Culture and the Humanities. Las Vegas, NV. March.

## 2010

- “Representing African American Womanhood in the Early Republic.” President’s Plenary. Society for Early American History. Rochester, NY. June.
- “Race, Servitude and Family.” (comment.) *Ab Initio*: Law in Early America. University of Pennsylvania Law School. June.
- “Reflections on Becoming a Research Subject: Or, Can an Activist Lawyer Write the History of Law.” CAAS 40<sup>th</sup> Anniversary Conference. University of Michigan. March.

## 2009

- “Overturning *Dred Scott v. Sandford*: African American Citizenship in the Antebellum City.” American Society for Legal History. Dallas, TX. November.
- “I was born in... Croix-des-Bouquets”: Time, Space, and Jurisdiction in Gradual Emancipation New York.”
- “Ambiguous Conditions: Law, Slavery and Freedom in the Atlantic World,” Universidade Estadual de Campinas (UNICAMP), Brazil. November.
- “Trans-Atlantic Visions: The Case of Haiti’s Faustin Soulouque.” Reframing the Color Line: Race and the Visual Culture of the Atlantic World. Clements Library, University of Michigan. October.

“Meaning, Memory, and the Banning of the Slave Trade in 1808 and 2008: A View from the United States.”

Les Effets de l’Abolition de la Traite par la Grande Bretagne sur les Discourse Nationaux. Institut Charles V & École des Hautes Études en Sciences Sociales (EHESS.) Paris, France. June.

“Eglise, Pratiques Culturelles de la Sphere Publique et Libres de Couleur aux Etats-Unis/Church, Public Culture and Free People of Color in Early America.” Affranchis et Descendants d’Affranchis dans le Monde Atlantique: Statuts Juridiques, Insertions Sociales et Identites Culturelles. Musee d’Aquitaine. Bordeaux, France. May.

“Still “Pivoting the Center”: From African-American Women’s History to the History of the Atlantic World.” Organization of American Historians Annual Meeting. Seattle, WA. March.

#### 2008

“Haiti Re-Enslaved: Saint-Domingue Refugees and American Law in the Slave Markets in New Orleans.” Southern Historical Association Annual Meeting. New Orleans, LA. October.

“Slavery and Naming in Gradual Emancipation New York City.” Naming Practices in Brazilian and Caribbean History. Center for Latin American and Caribbean Studies. University of Michigan. September.

“I was born in... Croix-des-Bouquets”: Space, Time, and Jurisdiction in Atlantic World Slavery.” Atlantic Emancipations. The McNeil Center for Early American Studies. University of Pennsylvania. April.

#### 2007

“From Croix-des-Bouquets to Baltimore: Reasserting and Resisting Mastery.” American Historical Association. Washington, DC. January.

“Gender and the “Black Founders”: Looking for Black Women in the History of the Early Republic.” Society for the History of the Early American Republic (SHEAR). Worcester, Mass. July.

“*Baptiste v. de Volunbrun*: Law, History, and the Re-Making of the Haitian Revolution.” French Colonial Historical Society/Société d’Histoire Coloniale Française. LaRochelle. France. June.

#### PROFESSIONAL ACTIVITIES, AND SERVICE (selected)

Berkshire Conference of Women Historians. Co-President. June 2017-

Organization of American Historians. Executive Committee. 2017-present.

Society of Historians of the Early American Republic. Book prize committee. Member. 2015-present.

*Journal of the Early Republic*. Editorial Board Member. 2016-present.

*Law & Social Inquiry*. Editorial Board Member. 2015-present.

*Slavery & Abolition*. Editorial Board Member. 2015-present.

*Souls: A Critical Journal of Black Politics, Culture and Society*. Editorial Board Member. 2008-present.

American Society for Legal History. Nominations Committee. 2014-2017.

Organization of American Historians. Mary Jurich Nickliss Prize in U.S. Women's and/or Gender History Committee. Member. 2016-17.

American Society for Legal History. Program Committee 2015 Co-Chair. 2014-2015.

*Journal of Women’s History*. Article Prize Committee. 2013-14.

Law and Society Association. J. Willard Hurst Prize Committee. 2012-13.

American Society for Legal History. Publications Committee. 2011-14.

Organization of American Historians. Merle Curti Award Committee. 2012-13.

Organization of American Historians. Darlene Clark Hine Award Committee. 2011-12.

*Journal of Women's History*. Editorial Board Member. 2006-2014.

Columbia University Center for the Critical Analysis of Social Difference. *Toward an Intellectual History of Black Women*. Co-director. 2008-2011.

American Society for Legal History. Member, Board of Directors, 2009-2011.

Organization of American Historians. 2011 Annual Meeting Program Committee, 2009-2011.

Berkshire Conference of Women Historians. 2005 Conference Program Committee. 2004-2005.

*American Quarterly*, *Journal of Social History*, *Journal of Women's History*, *Gender & History*, *Law and History Review*, *Law & Social Inquiry*, *Slavery and Abolition*, *Word & Image*, Harvard University Press, Oxford University Press, University of Georgia Press, University of Michigan Press, University of Illinois Press, University of North Carolina Press, NYU Press, University of Pennsylvania Press, and Palgrave/MacMillan.  
Manuscript reviewer. 2003-present.

At Johns Hopkins University

Agora Institute. Director search. 2017-present.

At the University of Michigan (selected):

Program in Race, Law & History. University of Michigan Law School. Co-director (with William J. Novak and Rebecca J. Scott.) 2011-2017.

William L. Clements Library. Committee of Management. 2012-2017.

Rackham Graduate School. MORE Committee Member. 2015-1027.

The Law in Slavery and Freedom Project. Director (with Rebecca J. Scott and Jean Hébrard.) 2002-present.

Center for Research on Learning and Teaching (CRLT.) Advisory Board Member. 2014-2016.

Associate Chair of Afroamerican and African Studies, 2012-2013, 2014-2016.

Understanding Race Theme Semester. College of Literature, Science and the Arts. Co-chair. 2011-2013.

William Clements Library. University of Michigan. Price Fellowship Review Committee. Member. 2004-09.

# Exhibit B

## Introduction

I am the Society of Black Alumni Presidential Professor and Professor of History at Johns Hopkins University. Prior to joining the Johns Hopkins University faculty, I was the Presidential Bicentennial Professor at the University of Michigan, Ann Arbor, where I was a member of the faculties in law, history, and African American Studies. I hold a PhD in history from Columbia University and a JD from the City University of New York School of Law. I am an internationally recognized expert in the history of slavery, race, and law in United States History. I am author of *All Bound Up Together: The Woman Question in African American Public Culture, 1830-1900* (2007), and *Birthright Citizens: A History of Race and Rights in Antebellum America* (2018), and a co-editor of *Toward an Intellectual History of Black Women* (2015), as well as author of numerous articles and essay. I am a member of the executive board of the Organization of American Historians and a President of the Berkshire Conference of Women Historians.

The report was prepared at the request of the Washington State Attorney General's Office. It was produced by way of a review of the scholarly historical literature on the subject of slavery in British North America and the United States, with an emphasis on the antebellum (or pre-Civil War) decades of 1830-1860.



## Overview: Slavery in British North America

In the United States, slavery was an institution premised upon the notion of property in persons. Historians have adopted this phrase to express how enslaved people were regarded simultaneously as human beings and as property. Enslaved children, like adults, were viewed as property: investments, collateral, commodities, and bound laborers. They were also recognized as persons, exercising will, acquiring knowledge and skills, and constructing communities and intimate relations. They could be bought and sold on the courthouse steps and also be held culpable for their bad acts in a courtroom. What set this form of coerced labor apart from others, including indentured servitude, was the ever-present possibility of individuals being sold, often termed the chattel principle.<sup>1</sup>

Slavery was a fundamental component of North American economic, legal, and political structures from the 17<sup>th</sup> century forward. The documented presence of Africans pre-dates this period, but it was in the 1600s with European settlement that British colonial officials began to regulate those held as slaves, including their family lives. By a 1662 Act, for example, the colonial legislature of Virginia determined that the status of an enslaved woman's children would follow her condition, thus also becoming slaves: "Children got by an Englishman upon a Negro woman shall be bond or free according to the condition of the mother...." This principle – *partus sequitur ventrem* – would come to govern throughout the British North American colonies

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<sup>1</sup> On persons as property and the chattel principle, see Walter Johnson, *Soul by Soul: Life Inside the Antebellum Slave Market* (Cambridge, MA: Harvard University Press, 1999).

and later the United States. This was a departure from English common law, which deemed that children followed the status of their fathers.<sup>2</sup>

The regulation of slavery was not limited to any one region in North America, and extended up and down the Atlantic seaboard, from what today we would term north to south. In 1690, people of African descent comprised less than 15% of the populations of Virginia and Maryland. That changed between 1690 and 1710, when the numbers of enslaved people being imported into those states doubled. By 1770, people of African descent comprised 40 percent of the population in Georgia. In the mid-18<sup>th</sup> century North, slaves were just over 9 percent of Rhode Island's population, 7.5 percent in New Jersey, and over 12 percent of the overall population in New York. In the wake of the American Revolution, most northern states would set in place gradual abolition schemes. Still, enslaved people continued to be held in that region up until the Civil War in New Jersey.<sup>3</sup> At the time of the first federal census in 1790, the number of enslaved

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<sup>2</sup> A. Leon Higginbotham, *In the Matter of Color: Race and the American Legal Process, The Colonial Period* (New York: Oxford University Press, 1978.) Jennifer L. Morgan, "Partus Sequitur Ventrum: Law, Race, and Reproduction in Colonial Slavery," *Small Axe* 22, No. 1 (2018): 1-17.

<sup>3</sup> Stanley L. Engerman, Richard Sutch, and Gavin Wright, "Slavery for Historical Statistics of the United States," University of California Project on the Historical Statistics of the United States, March 2003.

people in the US totaled 29,264, or just over 35 percent of the overall population, with the largest numbers of slaves held in Maryland, Virginia and North Carolina.<sup>4</sup>

Parent-child relations among enslaved people were not merely regulated, they were at risk. By the mid-17<sup>th</sup> century, the separation of children from parents was commonplace in the New England colonies. In Wethersfield, Connecticut, for example, youngsters were “given away or sold in order to enhance an owner’s wealth, settle debts, or simply in exchange for a more desirable commodity.”<sup>5</sup> Courts frequently encountered questions about how to regard enslaved families in the context of estate proceedings, both testate and intestate. Practice varied as courts worked through questions about whether slaves were real or personal property. But overall, interpretations strongly favored the right of inheritance, such that enslaved families were frequently separated, or “portioned,” without restriction.<sup>6</sup> It was possible even to bequeath an

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<sup>4</sup> *Return of the Whole Number of Persons Within the Several Districts of the United States* (Philadelphia, PA: J. Phillips, 1793).

<sup>5</sup> Peter Benes, “Slavery in Boston Households, 1647-1770,” *Dublin Seminar for New England Folklife Annual Proceedings* 28 (July 2003): 12-30.

<sup>6</sup> Thomas D. Morris, *Southern Slavery and the Law, 1619-1860* (Chapel Hill, NC: University of North Carolina Press, 1999.) On the frequency, durability, and resistance of enslaved families, see Tera W. Hunter, *Bound in Wedlock: Slave and Free Black Marriage in the Nineteenth Century* (Cambridge, MA: Harvard University Press, 2017).

enslaved woman's future children to a party other than the woman's owner, anticipating the separation of parent from child.<sup>7</sup>

### Slavery in the Antebellum United States.

This report principally concerns the experiences of enslaved families – including the separation of parents and children -- in the era after the American Revolution, with an emphasis on the three decades preceding the American Civil War (also known as the antebellum or prewar era.) This period also followed Congress's 1808 ban on the international slave trade, which barred the importation of enslaved people from beyond the nation's' borders into the US. In this period, slavery generated prosperity owing to the market success of slave-produced staple crops, including cotton and sugar. Simultaneously, slavery was subject to a sustained challenge, with the emergence of an abolitionist movement that called for slavery's immediate end.

The pressures on enslaved families and also on single enslaved women to reproduce a workforce grew in this period. The close of the international trade meant that future enslaved workers would no longer be imported from Africa or the Caribbean, and instead they would be drawn from a so-called natural increase in the domestic slave population. The reproductive labor of enslaved women, whose children were deemed to follow their mother's status, was now the sole source of future bound laborers. The value of such children as workers increased as access to imported slaves was closed. At the same time, a new sort of slave trade emerged, a domestic one

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<sup>7</sup> Thomas D. Morris, *Southern Slavery and the Law, 1619-1860* (Chapel Hill, NC: University of North Carolina Press, 1999.)

— buying and selling enslaved people strictly within the US — that forced the relocation of what are estimated to have been between one to two million slaves. This trade relocated enslaved people from upper South states such as Maryland and Virginia, where soil had been depleted and the economy had shifted to a reliance upon wage laborers, to cotton, rice and sugar producing regions further south. The related sales further disrupted the bonds of enslaved families.<sup>8</sup>

In antebellum America, between 1820 and 1860, two out of every five slaves were younger than fifteen and one-third was younger than ten.<sup>9</sup> The lives of enslaved children were especially precarious. Rates of “mortality, morbidity, and injury” were high, with sickness and death being commonplace. Slaveholders generally neglected the health of enslaved children, even at the risk of losing valuable property. The capacities of enslaved parents to care for their children were limited by the demands of work and the scarcity of resources. Slaveholders came between parents and children in everyday ways, assigning work responsibilities and meting out punishments. Still, the day-to-day rearing of children was generally left to enslaved parents and their communities. Historians do not agree about the degree to which such parents could ensure

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<sup>8</sup> Steven Deyle, *Carry Me Black: The Domestic Slave Trade in American Life* (New York: NY: Oxford University Press, 2005); Daina Ramey Berry, *The Price for Their Pound of Flesh: The Value of the Enslaved, from Womb to Grave, in the Building of a Nation* (Beacon Press, 2017).

<sup>9</sup> Historian Wilma King makes the point that age is only one criterion by which to determine who is a child. As her the title of her 1997 book suggests, enslaved young people had much of the childhoods “stolen,” by the demands placed upon them by slaveholders. Wilma King, *Stolen Childhood: Slave Youth in Nineteenth-Century America* (Bloomington, IN: Indiana University Press, 1997).

the well being of children. We do know that adults negotiated with slaveholders, trading their labor and general deference for an owner's special consideration for children and the granting of parental autonomy over the care and raising of children. This was a delicate bargain enacted between unequal parties, with slave owners holding the balance of power and enslaved parents having no legally enforceable rights. These were frequently negotiations conducted in the context of the ultimate threat: the separation of children from their parents.<sup>10</sup>

### Slavery and Law.

Slavery was an institution rooted in and dependent upon law. From constitutions and statutes to high courts and clerks' offices, slavery was built upon the premise of property in persons. This was no metaphor. Slaveholders and those who traded in or otherwise profited from the institution depended upon law to formalize their interests, resolve their disputes, and generally ensure that owners could premise their economic lives upon the future control of bound labor.

The US Constitution of 1787 was a proslavery document. Of course, slavery pre-dated its ratification. Still, as the framers crafted a new governing text for the nation, they also ensured that slavery would be part of that founding fabric. The Constitution shielded the international slave trade from Congressional interference. (Article 1, section 9.) Slavery determined to an

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<sup>10</sup> Marie Jenkins Schwartz, "Ill and Injured Children on Antebellum Slave Plantations: A Dangerous Childhood," *Southern Quarterly* 53, no 3/4 (Spring/Summer 2016): 56-69; Marie Jenkins Schwartz, *Born in Bondage: Growing Up Enslaved in the Antebellum South* (Cambridge, MA: Harvard University Press, 2000).

important degree how representation in Congress and taxes would be determined, by way of the 3/5ths clause which granted slave holding states enhanced representation in Congress based upon unfree persons who did not themselves exercise political rights. (Article 1, section 2.) The fugitive slave clause authorized Congress to aid slaveholders who sought to recover fugitive slaves by way of a “militia” that would “suppress insurrections,” a provision that had putting down slave uprisings in mind. (Article 4, section 2.) A casual reading of the 1787 Constitution might miss its pro-slavery character. This is because the framers employed coded language – referring to slaves as, for example, “all other persons”—to shield the document from direct criticism. Still, reading of the slim notes from the constitutional convention itself and the robust ratification debates that followed, make plain that the framers knew they were helping to guarantee slavery’s future.<sup>11</sup>

The US Supreme Court did not play a major role in the furtherance and protection of slavery. As discussed below, largely state law governed the institution. Important exceptions are worth noting, however, the most notorious being the decision in *Dred Scott v. Sandford*.<sup>12</sup> Asked to review a lower court decision that had deemed Scott a slave, the high court reached beyond that issue to deny the authority of federal courts to hear freedom suits brought by enslaved people

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<sup>11</sup> James Oakes, “The Compromising Expedient: Justifying a Proslavery Constitution,” *Cardozo Law Review* 17 (1995-1996): 2023; David Waldstreicher, *Slavery’s Constitution: From Revolution to Ratification* (New York: Macmillan, 2010); and, Paul Finkelman, “Affirmative Action for the Master Class: The Creation of the Proslavery Constitution,” *Akron Law Review* 32, no. 3 (1999): 423-470.

<sup>12</sup> *Scott v Sandford*, 60 US 393 (1857).

altogether. Scott was as a black person, the decision opined, was not a citizen of the United States. He was thus without standing to bring suit in federal court under diversity jurisdiction. The court went on to conclude that no person of African descent, enslaved or free, could be a citizen of the United States. As for slavery more broadly, the court deemed the Missouri Compromise of 1820, which had emanated from Congress's assumed authority to regulate slavery in US territories, unconstitutional thus invalidating Congress's power to govern slavery there. Subsequent opposition to *Dred Scott* compromised the court's reputation and its decision was in essence superseded by the 13<sup>th</sup> and 14<sup>th</sup> Amendments, in 1865 and 1868 respectively.

Slavery was however, in the parlance of the period, a domestic institution, meaning that state legislatures and courts largely regulated slavery. As discussed above, individual colonies had early on governed slavery by positive law. This continued into the antebellum period as individual states regulated the institution. There were those that abolished slavery in the North. In the southern slaveholding states, state law governed slavery by way of public law, including criminal codes that provided a unique set of charges and sanctions for enslaved offenders. Private law too was extensively involved in regulating slavery, especially in the areas of contract and trusts and estate. Few states governed by way of comprehensive codes, with Louisiana being the exception. State legislatures and high courts were busy throughout the antebellum period setting forth statutes and common law principles that managed nearly all aspects of slavery. While only a small subset of enslaved people would ever be party to or the subject of court



proceedings, slaveholders relied upon the ever-available terms of state law, court, judges, and clerks to organize and exert their power over bonds people.<sup>13</sup>

The separation of enslaved parent from their children was facilitated by the very same state laws, and enforced by courts through otherwise ordinary proceedings. This was a widespread practice, though precisely how far it is difficult to quantify. As important as the fact of separation was, separation of families was also an ever-present threat. Slavery was not an institution governed merely by the lash. Law was an essential instrument for slaveholders who looked to maximize the profits of property in persons. But much of slavery's day-to-day regulation was informal, characterized by a persistent struggle between slaveholders and those hold in bondage.

Among the tools of coercion employed by slaveholders, as they sought to render enslaved people compliant, was the threat of separating families. Historians of slavery emphasize that no threat — not the lash, or degraded working conditions, or the curtailment of modest privileges — was more potent and more feared than the threat that reluctant, resistant, or otherwise non-compliant slaves would be sold. Instilling the fear of separation might be used as a weapon. But even in slaveholding households where no such explicit threats were leveled, enslaved people knew that

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<sup>13</sup> Ariela J. Gross, *Double Character: Slavery and Mastery in the Antebellum Southern Courtroom* (Princeton, NJ: Princeton University Press, 2000.) Thomas D. Morris, *Southern Slavery and the Law, 1619-1860* (Chapel Hill, NC: University of North Carolina Press, 1999.)

an owner's death, bankruptcy, or other change of circumstances could result in the redistribution of property in persons and hence separate enslaved parents from children.<sup>14</sup>

Enslaved people wrote with great feeling about the experience of being separated from their families. Enslaved poet Phillis Wheatley survived the middle passage as a captive, in a journey that took her from West African to Boston, Massachusetts. The year was 1761 and Wheatley was just seven or eight years of age. Wheatley went on, under the tutelage of her owner, to publish her poetry to critical acclaim. In her writings, Wheatley expressed her longings for Africa and her parents whom she would never see again. Frederick Douglass is among the best remembered of the antebellum period's fugitive slaves, going on to a career as an anti-slavery activist, journalist, orator, and statesman. Douglass published his first memoir in 1845, explaining his life as an enslaved boy. In the opening chapter, he recounted how forced separations blunted his feelings: "I never saw my mother, to know her as such, more than four or five times in my life; and each of these times was very short in duration, and at night. ... She died when I was about seven years old, on one of my master's farms. ... Never having enjoyed, to any considerable

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<sup>14</sup> Walter Johnson, *Soul by Soul: Life Inside the Antebellum Slave Market* (Cambridge, MA: Harvard University Press, 2001) and, Marie Jenkins Schwartz, *Born in Bondage: Growing Up Enslaved in the Antebellum South* (Cambridge, MA: Harvard University Press, 2000).

extent, her soothing presence, her tender and watchful care, I received the tidings of her death with much the same emotions I should have probably felt at the death of a stranger.”<sup>15</sup>

Sojourner Truth, the anti slavery and women’s rights orator, recounted how she was forcibly separated from her son during her time as a slave in upstate New York. It was a story of how slaveholders traded young enslaved people within white families, without regard for the bonds among slaves themselves. Truth’s “old master ... had sold her child, a boy of five years, to a Dr. Gedney, who took him with him as far as New York city, on his way to England; but finding the boy too small for his service, he sent him back to his brother, Solomon Gedney. This man disposed of him to his sister's husband, a wealthy planter, by the name of Fowler, who took him to his own home in Alabama. This illegal and fraudulent transaction had been perpetrated some months before [Truth] knew of it.”<sup>16</sup>

The story of Matthew Matthews suggests that while some white Americans might act as allies to enslaved people, slaveholder’s property interests were nearly always paramount. Originally from Virginia, Matthews purchased his own freedom with the intent of also purchasing his children in

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<sup>15</sup> Vincent Carretta, *Phillis Wheatley: Biography of a Genius in Bondage* (Athens, GA: University of Georgia Press, 2011); Frederick Douglass, *Narrative of the Life of Frederick Douglass, An America Slave, Written by Himself* (Boston, MA: Anti-Slavery Office, 1845).

<sup>16</sup> Sojourner Truth with Olive Gilbert. *Narrative of Sojourner Truth, a Northern Slave, Emancipated from Bodily Servitude by the State of New York, in 1828* (Boston: J. B. Yerrinton and Son, 1850), 44.

1835. He was only partially successful, gaining legal custody of one child while being faced with the threat that the owner of his remaining children, who faced hard financial times, might be forced to sell his children at public auction and beyond their father's reach. Matthew's letters suggest that he was dogged, ingenious, and had the capacity to enlist the support of other African Americans, who loaned him money, and influential whites who interceded on his behalf.<sup>17</sup>

The dislocations of the Civil War only continued the problem of children being separated from parents. They also gave enslaved people unprecedented opportunity to challenge and even rectify the separation of parent from child. Rose Herera's owners sought to avoid the incursion of Union troops into the slaveholding city of New Orleans, Louisiana in 1862. They fled to Cuba, taking with them three of Herera's four children – aged two, four and six. It appeared that Herera and her husband, a free man of color, had no recourse because the children were property, following the status of their mother. But Herera neither forgot her children nor her desire to be reunited with them. After the war's end, three years later in 1865, Herera appeared before a local magistrate to complain that her children had been kidnapped. What followed were months of legal wrangling that resulted in a hard-won reunion. Still, Herera, her husband, and their children endured years of separation and uncertainty in the interim.<sup>18</sup>

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<sup>17</sup> "Masters-Taylor-Wilbur Papers, 1796-1857," The William L. Clements Library, University of Michigan, Ann Arbor, MI.

<sup>18</sup> Adam Rothman, *Beyond Freedom's Reach: A Kidnapping in the Twilight of Slavery* (Cambridge, MA: Harvard University Press, 2015). See also, Georgena Duncan, "'One negro, Sarah ... one horse named Collier, one cow and calf named Pink': Slave Records from the Arkansas River Valley," *Arkansas Historical Quarterly* 69, no. 4 (Winter 2010): 325-345. Gail

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S. Terry, “Sustaining the bonds of kinship in a trans-Appalachian migration, 1790-1811” *The Cabell-Breckinridge Slaves Move West*, *Virginia Magazine of History & Biography* 102 (October 1994): 455-476, and Laurence J. Kotlikoff, “The Structure of Slave Prices in New Orleans, 1804-1862,” *Economic Inquiry* 17, no. 4 (October 1979): 496 – 518.

## The Antislavery Critique of Separating Families

The abolitionist movement documented the separation of children from parents, and made this a cornerstone in their case for the end of slavery. Families were central, sacred, and the bedrock of American society, they argued. Slavery's violence, injustice, and contradictions were revealed nowhere more plainly than in those many instances in which families were broken up. The movement relied to an important degree upon what was termed "moral suasion." Among abolitionists were those who believe that only by transforming the hearts and minds of white Americans to the anti slavery cause, would the institution end. They utilized the podium, newspaper and pamphlets – the media of the day – with great effectiveness. Eventually experienced teams of speakers — black and white – were touring the US and Great Britain seeking new subscribers to the movement. Their training included pamphlet such as La Roy Sunderland 1837 *Antislavery Manual*.<sup>19</sup>

Sunderland armed anti slavery advocates with two points of view on the separation of children from parents. The first was comparative. "Unlike American slavery," what he termed "Jewish Servitude" had be a more benign institution that respected domestic relations such that parents and children could not be separated and when a woman was freed, her children remained with her. His second point came in the form a story, borrowed from the narrative of a former slave, Charles Ball. Ball had describe in poignant detail the day he was separated from his mother: "My poor mother, when she saw me leaving her for the last time, ran after me, took me down from the horse, clasped me in her arms, and wept loudly and bitterly over me. ... The slave-driver who

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<sup>19</sup> La Roy Sunderland, *Anti-Slavery Manual* (New York, NY: Piercy & Reed, 1837).

had first bought her, came running in pursuit of her with a raw hide in his hand. When he overtook us, he told her was her master now, and ordered her to give that little negro to its owner, and come back to him.” My mother then turned to him and cried “Oh, master, do not take me from my child!” “I never again heard the voice of my poor mother,” Ball wrote. Ball’s story went on to suggest how such scenes might be repeated in one individual’s lifetime. He went on to make his own family, only to be sold away from his wife and children.”<sup>20</sup>

No one piece of anti slavery literature had more influence than did Harriet Beecher Stowe’s novel *Uncle Tom’s Cabin*. It was widely read in its own time, credited by Abraham Lincoln with having helped start the Civil War, and was retold in newspaper installments, books, and also stage productions. Stowe convincingly taught thousands upon thousands of Americans about the evils of slavery, and first among those evil was the separation of children from parents: *Uncle Tom’s Cabin* is an ambitious novel with many characters and plot-lines, but at its heart are stories of three enslaved people whose lives were defined by family separations. Eliza and George Harris learn that their son Harry is going to be sold away from them and run away. The title character Tom Shelby is sold away from his wife and children, and spends the rest of the novel trying to find his way back to them. *Uncle Tom’s Cabin* rested upon artful fiction, but its success was attributable to how true Stowe’s story was in the lives of many unnamed enslaved people. Northern sentiment arrived at a consensus that condemned the separation of children from parents as among slavery’s most abhorrent practices.<sup>21</sup>

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<sup>20</sup> La Roy Sunderland, *Anti-Slavery Manual* (New York, NY: Piercy & Reed, 1837).

<sup>21</sup> Ben Railton, “Considering History: Uncle Tom’s Cabin and Imagining Slavery’s Family Separations,” *The Saturday Evening Post*, June 20, 2018. Henry Louis Gates, Jr. and Hollis

### Critique Emerges in Proslavery Circles

The testimony of former slaves along with Stowe's powerful narrative appear to have led southern lawmakers to develop their own critique of separating children from parents. By the 1850s, individual states were revising their laws to place gentle but real curbs upon such practices by slaveholders. There was of course a self-serving dimension to such reforms. Proslavery lawmakers hoped to deflect broader criticisms by implementing modest changes. At the same time, the decision to put in place reforms on precisely the question of family integrity was linked to how widespread and compelling a critique there was.

There emerged a modest willingness to permit abolitionist criticism to enter law and policy. In Georgia, for example, a new 1854 statute prohibited executors and administrators from selling children under the age of five; they were to be placed together with their mothers. But there was a caveat: "Unless such division cannot in any wise be affected without such separation." The right of inheritance outweighed even this effort to limit the horrors that slaves lived with because of an inheritance.<sup>22</sup> The Maryland Supreme Court in *Homes v. Mitchell* introduced the view that there were limits to how enslaved children could be disposed of, and they were moral limits:

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Robbins, *The Annotated Uncle Tom's Cabin by Harriet Beecher Stowe* (New York: W. W. Norton, 2007.)

<sup>22</sup> Thomas D. Morris, *Southern Slavery and the Law, 1619-1860* (Chapel Hill, NC: University of North Carolina Press, 1999): 83.



“The infant cannot be torn from its mother and sold or transferred to the complainant. No one would buy, and humanity would cry out against it.”<sup>23</sup>

The Alabama code of 1852 critiqued separating young children from parents in a provision that barred removing enslaved children under ten from their mothers.<sup>24</sup> The state’s Governor explained the underlying reasoning, and while he was in no sense an abolitionist, his ideas were consistent with the critique that both enslaved people and anti slavery activists had long leveled. The new law left slaveholders an out if keeping families together was impractical and the Governor urged a stricter law: “The Code very properly provides that slave children of tender years shall, at judicial and some other sales, be offered with their mothers.... These provisions, in my judgment, should be absolute, at least as it respects mothers, and children of ten years of age and under, and husband and wife, where the latter relation is admitted by the owner of the slaves. These relations which moral duty requires us to respect, and it can be no violation of policy to confirm municipal law to good morals. It is universally conceded that slaves are reasonable beings – with the moral feelings, it is true, often obtuse, but susceptible of improvement. The husband and wife generally cherish affection for each other, and the mutual attachment of mother and child is usually strong. The mother is not always wise counselor, but she must be presumed to be the most constant and sincere the child has. Let, then, the latter enjoy this parental oversight during childhood, that it may be the better prepared by good principles and industrious habits act its part afterwards.” Proslavery thought in some cases adapted to the

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<sup>23</sup> *Scott v. Dobson*, 1 Har. and McH. 160 (Md., 1852.)

<sup>24</sup> *The Code of Alabama* (Brittan and De Wolf, 1852), 392.

view that separating young children from parents went too far, even in a system that openly sanctioned the holding of persons as property.”<sup>25</sup>

Criticism of how slavery separated families was reflected in Congress’s debates as it contemplated the abolition of slavery. Republican Senator James Harlan of Iowa spoke in support of the 13<sup>th</sup> Amendment, explaining that the failure to abolish slavery would leave in place unnecessary evils. First, Harlan decried how slavery had abrogated the “conjugal relations of enslaved people.” He then went on to make plain how slavery had tragically severed the relations between family and child: “Another incident is the abolition practically of the parental relation, robbing the offspring of the care and attention of his parents, severing a relation which is universally cited as the emblem of the relation sustained by the creator to the human family. And yet, according to the matured judgment of these slave States, this guardianship of the parent over his own children must be abrogated to secure the perpetuity of slavery.”<sup>26</sup>

## Legacies

The legacy of separating families during slavery extended well into the 20<sup>th</sup> century. Enslaved people themselves left poignant records that reveal the immediate cost and the long term consequences of separating children from parents under slavery. Their stories, many of them told

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<sup>25</sup> *Journal of the Fourth Biennial Session of the Senate of the State of Alabama. Session of 1853-54* (Montgomery, AL: Birttan & Blue, 1854).

<sup>26</sup> *Congressional Globe*. 38<sup>th</sup> Congress, 1<sup>st</sup> Session (1864).

years after slavery was abolished, are a testament to how vital family was to enslaved people and about how their experience of loss was not ever set aside or forgotten.

First hand accounts of former slaves, were collected by the Federal Writer's Project of the Works Progress Administration in the 1930s. The "WPA narratives," as they are commonly termed, were produced by anthropologists, folklorists, and historians traveling the country to record the life stories of former slaves. This set of 2000 interviews conducted across 17 states, paints a vivid picture of life for children under slavery. Very elderly when the interviews were taken, the men and women studied had been young people in the years just prior to emancipation. They invariably tell stories of losing family members to sale, trade, and the vagaries of the market in persons. We learn that even many decades later, late in life, former slaves recalled and mourned the irretrievable loss of family members. These losses were still being felt well into the 20<sup>th</sup> century.<sup>27</sup>

No evidence is more arresting than that of the advertisements that former slaves placed in newspapers following emancipation. There, in columns with titles such as "Information Wanted," freed people searched across time and space hoping to be reunited with loved ones from whom they had been separated

"The Atlanta Constitution. August 19, 1917. Mr. and Mrs. Johnnie Dillard, of Lynchburg, Va., wish to find their nine children, Mollie, Daniel, John, Tommy, Malinda, Jimmie, Mauncy and

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<sup>27</sup> Heather Andrea Williams, *Help Me to Find My People: The African American Search for Family Lost in Slavery* (Chapel Hill, NC: University of North Carolina Press, 2012).

Margaret Jane (all colored), who when last heard of were sold by negro traders. Write information to Mamie Stuart, rear of 355 Walnut Street, Atlanta, Ga. Will pay all expenses.”

These ads continued to be published into the early 20<sup>th</sup> century, a half century after slavery had been abolished. Mothers searched for sons, fathers for daughters, children for parent and for siblings. Husband searched for wives. Slavery may have most often been indifferent to the kinship bonds of slaves, and slavery certainly ensured that those bonds would be strained. Still, the thousands of ads placed by former slaves in search of loved ones make plain that in many cases such bonds were not broken.<sup>28</sup>

## Conclusion

The separation of enslaved children from their parents was a regular and even commonplace dimension of slavery in the United States. By sale or gift, estate division or to satisfy a debt, enslaved families lived under the ever-present threat they would be separated. Fugitive slaves testified to the experience of being separated from loved ones, and abolitionists held the destruction of the enslaved family up as one of the institution’s most egregious practices. By the 1850s, even pro-slavery lawmakers recognized that separating young children from mothers was contrary to both morality and policy, and put modest curbs against the practice in place. With slavery’s abolition in 1865, a new era opened up, a half-century during which family members

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<sup>28</sup> Heather Andrea Williams, *Help Me to Find My People: The African American Search for Family Lost in Slavery* (Chapel Hill, NC: University of North Carolina Press, 2012).

separated by slavery searched for one another. The legacy of separating enslaved families was thus felt into the 20<sup>st</sup> century

# Exhibit 50



1           5.     The potential crises for public health from the FLETC barracks housing  
2 contributed to the case for closure of the facility.

3           6.     Even though mothers and their babies were not separated in the FLETC facility  
4 in 2014 and instead were housed together with other immigrant families, their lives were  
5 endangered because of institutionalization without adequate inoculation to prevent the spread  
6 of communicable diseases.

7           7.     In addition to the health traumas from the spread of infectious diseases, the  
8 population at the FLETC facility suffered psychological and emotional damage from the  
9 trauma of incarceration and their uncertain physical circumstances.

10          8.     It is well-known that psychological trauma feeds stress and emotional  
11 breakdowns as clearly as lack of inoculation feeds infectious physical diseases.

12          9.     There is no reason to expect that facilities constructed at the four military bases  
13 under President Trump's executive order reversing the family separation policy will be able to  
14 prevent the common physical, emotional and psychological problems triggered by the housing  
15 of immigrants in barracks in 2014.

16          10.    I am concerned that the current administration's policies will be implemented  
17 without time or planning to ensure that adequate preventive health care are in place prior to  
18 moving families into close quarters where infectious diseases thrive.

19          11.    For this reason, I declare my opposition to the announced plans to house  
20 immigrant families together pending adjudication in military or other facilities.

21           I declare under penalty of perjury under the laws of the State of Washington and the  
22 United States of America that the foregoing is true and correct.

23           DATED this 22<sup>nd</sup> day of June, 2018 at 11AM, Albuquerque, New  
24 Mexico.

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26 Arnold Lane Lockman MD  
521 Solano Dr NE, Albuquerque, NM  
87108



# Exhibit 51

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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON, STATE OF  
CALIFORNIA, et al.

Plaintiffs,

v.

THE UNITED STATES OF AMERICA,  
et al.,

Defendants.

NO. 2:18-cv-00939

DECLARATION OF SHADI  
HOUSHYAR IN SUPPORT  
OF PLAINTIFFS' MOTION  
FOR EXPEDITED  
DISCOVERY

I, Shadi Houshyar, declare as follows:

I am over the age of 18 and make this declaration based upon my personal experience and my expertise.

1. I recently joined Families USA as Director of Early Childhood and Child Welfare Initiatives. I have over a dozen years of experience working in the nonprofit sector on federal and state child welfare and early childhood policies with a primary focus on childhood trauma, toxic stress, and adverse childhood experiences (ACEs). Before coming to Families USA, I worked at the Washington, D.C.-based Center for the Study of Social Policy (CSSP), an organization that promotes policy solutions and provides technical assistance that allows policymakers and community-based organizations to improve outcomes for vulnerable children and families. At CSSP, I led a project focused on preventing and mitigating the effects of toxic stress on young children and their families while building and sustaining partnerships

1 with national leaders in the early childhood arena. Previously, I spent nearly a decade as Vice  
2 President of Child Welfare Policy at First Focus, where I led federal child welfare policy  
3 efforts, including advocacy on child abuse and neglect prevention, foster care, and health and  
4 behavioral health policies affecting children and their families. I also was founding director of  
5 First Focus's State Policy and Advocacy Reform Center, a national resource center for state-  
6 based advocates aimed at improving outcomes for children and families involved with the  
7 child welfare system by building the capacity of and connections between state child welfare  
8 advocates. I received my Ph.D., M.Phil., and M.S. degrees in Developmental Psychology from  
9 Yale University and my Bachelor of Science degree in Psychology from Kalamazoo College.

10 2. Founded in 1981, Families USA Foundation is a nonprofit, nonpartisan, 501(c)(3)  
11 organization that is dedicated to the achievement of high-quality, comprehensive, and  
12 affordable health care for all Americans. We advance our mission through public policy  
13 analysis, advocacy, and collaboration with partners to promote a patient- and community-  
14 centered health system. We work closely with more than 8,000 consumer leaders and more  
15 than 16,000 grassroots activists in all 50 states. We work closely with other national health  
16 care patient and consumer organizations on Medicaid and private insurance coverage,  
17 community health, and health equity issues. As part of our work, we talk directly with  
18 thousands of individual consumers about their experiences with the health care system. We  
19 help connect these individuals with opportunities to share their experiences publicly and help  
20 to seek improvements in health care.

21 3. Families USA is committed to the belief that separating children from their parents is  
22 harmful to children, traumatic for families, and runs counter to our basic American values.

23 4. The process of separation is itself traumatic. Children forcibly separated from their  
24 parents are placed in a Customs and Border Protection (CBP) facility before being transferred  
25 to the care of the Office of Refugee Resettlement (ORR) within the U.S. Department of Health  
26 and Human Services.

1 5. I am aware of reports of unsafe and poor conditions at CBP facilities, including concrete  
2 floors, fenced enclosures, brutally cold temperatures in holding cells and sheets of foil used as  
3 blankets. I am also aware that CBP's policy is to hold children in its custody for less than 72  
4 hours, but that nearly 300 children in a recent study—half under the age of 12—spent more  
5 than 72 hours.

6 6. Once transferred to ORR, children await placement with a parent, relative, or family  
7 friend. I am aware that ORR has reported that children spend an average of 56 days in its  
8 shelters. ORR is not a child welfare agency and does not have the necessary experience to care  
9 for the thousands of children, and now, a growing number of young children, it houses in a  
10 network of 100 facilities in 14 states. I am aware of reports stating that ORR shelters are  
11 operating at 95% capacity, housing as many as 11,200 children, and that babies and the  
12 youngest children are being sent to separate “tender age” shelters that are not equipped to  
13 adequately care for their needs. These shelters represent a return to the long-discredited  
14 practice of forcibly institutionalizing the very young with devastating consequences for their  
15 short and long-term health and wellbeing.

16 7. Research into early childhood adversity has shown that trauma suffered while young  
17 (adverse childhood experiences or ACEs) can have serious and lasting consequences for later  
18 health outcomes. Robust connections have been shown between ACEs and increased morbidity  
19 and mortality as an adult.<sup>1</sup> ACEs in early childhood have been linked to poor physical health  
20 outcomes<sup>2</sup> and below-average language and math skills and behavior problems in  
21 kindergarten.<sup>3</sup> Children who have suffered ACEs are also more likely to suffer from mental

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22 <sup>1</sup> Felitti VJ, Anda RF, Nordenberg D, Williamson DF, Spitz AM, Edwards V, Koss MP, Marks JS,  
23 “Relationship of childhood abuse and household dysfunction to many of the leading causes of death in adults. The  
24 Adverse Childhood Experiences (ACE) Study,” *American Journal of Preventive Medicine* 14, May 1998.  
Available at <https://www.ncbi.nlm.nih.gov/pubmed/9635069>.

25 <sup>2</sup> Flaherty EG, Thompson R, Litrownik AJ, et al. Effect of early childhood adversity on child health. *Arch Pediatr*  
*Adolesc Med.* 2006;160(12):1232–1238pmid:17146020

26 <sup>3</sup> Jimenez ME, Wade R Jr, Lin Y, Morrow LM, and Reichman NE, “Adverse Experiences in Early  
Childhood and Kindergarten Outcomes,” *Pediatrics* 137:2, February 2016. Available at  
<http://pediatrics.aappublications.org/content/early/2016/01/13/peds.2015-1839>.

1 health problems, chronic medical conditions, and poor social development.<sup>4</sup> These traumas  
2 have been shown to have intergenerational effects, harming the children of those who suffered  
3 ACEs.<sup>5</sup>

4 8. Frequent exposures to strong, frequent, and/or prolonged adversity without adequate  
5 adult support can cause “toxic stress” that leads to physiological effects on a child’s  
6 neuroendocrine and immune systems, stress regulatory system, and brain development.  
7 Children suffering from separation from a parent may show signs similar to those of post-  
8 traumatic stress disorder, including loss of appetite, trouble sleeping, and regressive behaviors.

9 9. Research also indicates that children are resilient, and can overcome adverse experiences  
10 with adequate adult support and a nurturing family environment. The absence of this stable  
11 environment can have lasting consequences for the brain’s recovery. Family separations result  
12 in a double trauma where the initial forced separation is coupled with the ongoing absence of  
13 the child’s primary resource of support or buffer for coping with the separation.

14 10. Federal and state child welfare policy conform to the finding that children do best in  
15 family environments, and that separation of a child from his or her parents should be done only  
16 in extreme cases, not as a standing matter of policy. Early childhood separation in a chaotic  
17 and unfamiliar environment can cause significant distress and is traumatic for children.

18 11. Reports of poor conditions at family detention facilities are common with visitors  
19 describing prison-like conditions with cement floors for sleeping; open toilets; lights on 24  
20 hours a day; inadequate food and water; and limited medical, dental, and mental health  
21 services. Reports by pediatric and mental health advocates following visits to family detention  
22 centers in 2015 and 2016 revealed discrepancies between ICE standards and the actual services

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23 <sup>4</sup> Kerker BD, Zhang J, Nadeem E, Stein REK, Hurlburt MS, Heneghan A, Landsverk J, Horwitz SM,  
24 “Adverse Childhood Experiences and Mental Health, Chronic Medical Conditions, and Development in Young  
25 Children,” *Academic Pediatrics* 15:5, September-October 2015. Available at  
[https://www.academicpediatricsjournal.net/article/S1876-2859\(15\)00173-4/abstract](https://www.academicpediatricsjournal.net/article/S1876-2859(15)00173-4/abstract).

26 <sup>5</sup> Lê-Scherban F, Wang X, Boyle-Steed KH, Pachter LM, “Intergenerational Associations of Parent  
Adverse Childhood Experiences and Child Health Outcomes,” *Pediatrics* 141:6, June 2018. Available at  
<http://pediatrics.aappublications.org/content/141/6/e20174274.long>.

1 provided to families, including reports of inadequate or inappropriate immunizations, delayed  
2 access to medical care, inadequate education services, and limited mental health services.<sup>6</sup>

3 12. The prison-like conditions in detention, including constant surveillance can be  
4 confusing and intimidating for children. Children may feel unsafe in detention which could be  
5 a trigger and re-traumatizing for children who have experienced past trauma.

6 13. The stress of detention can harm a child's developing brain and is associated with  
7 psychological distress and short-term symptoms including eating difficulties and somatic  
8 complaints, sleep problems, depression and anxiety, and long-term health consequences  
9 including developmental delays, post-traumatic stress disorder, anxiety, depression, suicidal  
10 ideation and other behavioral problems.<sup>7 8 9</sup> Children can experience significant distress and  
11 toxic stress in detention conditions.

12 14. Research indicates that a child's wellbeing is closely linked to his or her parent's  
13 stability and that a parent's ability to act as a buffer from toxic stress greatly affects early  
14 development.<sup>10</sup> Detention, even for brief periods of time, can also have adverse consequences  
15 for the health and wellbeing of parents.<sup>11</sup> Detention can exacerbate existing mental health  
16 conditions for parents and compromise a parent's ability – under stress – to respond to the  
17

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18 <sup>6</sup> American Immigration Council, American Immigration Lawyers Association, Catholic Legal Immigration Network  
19 Refugee and Immigrant Center for Education and Legal Services . Letter to Department of Homeland Security Office of  
20 Civil Rights and Civil Liberties re: ICE's continued failure to provide adequate medical care to mothers and children  
detained at the South Texas Family Residential Center. Available at: [www.aiala.org/File/DownloadEmbeddedFile/66149](http://www.aiala.org/File/DownloadEmbeddedFile/66149).

21 <sup>7</sup> Linton, JM, Marsha Griffin, M., Shapiro, AJ. Detention of Immigrant Children. [Policy Statement].  
22 PEDIATRICS, Volume 139, Number 4, April 2017.

23 <sup>8</sup> Lorek, A., Ehntholt, K., Nesbitt, A., Wey, E., Githinji, C., Rossor, E., Wickramasinghe, R., The mental and  
24 physical health difficulties of children held within a British immigration detention center: a pilot study, Child  
25 Abuse Negl. 2009 Sep;33(9):573-85.

26 <sup>9</sup> Keller, As, Rosenfeld, B, Trinh-Shevrin, C., Meserve, C., Sachs, E., Leviss, J.A., Singer, E., Smith, H.,  
Wilkinson, J., Kim, G., Allden, K., Ford, D. Mental health of detained asylum seekers. The Lancet, Volume 362,  
No. 9397, p1721-1723, 22 November 2003.

<sup>10</sup> Shonkoff, JP, Fisher, PA. Rethinking evidence-based practice and two-generation programs to create the future  
of early childhood policy. Developmental Psychopathology, 2013, 25: 1635-1653.

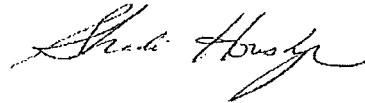
<sup>11</sup> International Detention Coalition (2012). Captured Childhood: Introducing a new model to ensure the rights and  
liberty of refugee, asylum seeker and irregular migrant children affected by migration detention. The report is  
available online at <https://idcoalition.org/wp-content/uploads/2012/03/IDC-Captured-Childhood-Report-Chap-5.pdf>.

1 needs of a child and to support a child's healthy development. Research suggests that longer  
2 periods in detention further compromise the capacity of parents to care for their children.

3 15. Based on my professional experience and background, available research and  
4 testimonials of both families and experts, I can say with certainty that both detention and  
5 family separation - even for short periods of time - are distressing, traumatic and damaging to  
6 the health and wellbeing of children and parents.

7 I declare under penalty of perjury under the laws of the State of California and the United  
8 States of America that the foregoing is true and correct.

9 Executed on this 27 day of June, 2018 in Washington, DC.

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15 Shadi Houshyar  
16 Director of Early Childhood and Child  
17 Welfare Initiatives, Families USA  
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# Exhibit 52



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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON,  
  
Plaintiff,  
  
v.  
  
THE UNITED STATES OF AMERICA, et  
al.,  
  
Defendants.

NO. 2:18-CV-00939  
  
DECLARATION OF MARYLEE  
SHEPPARD IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
EXPEDITED DISCOVERY

I, Marylee Sheppard, declare as follows:

1. I am a resident of the State of California. I am over the age of 18 and have personal knowledge of all the facts stated herein. If called as a witness, I could and would testify competently to the matters set forth below.
2. I obtained a Masters of Social Work in 2006 from California State University, Sacramento and have been a Licensed Clinical Social Worker since 2013.
3. I am currently employed by the California Department of Social Services (CDSS) and have been for 11 years. I currently serve as the Chief of the Child Protection and Family Support Branch (CPFSB), one of five branches within the Children and Family Services Division of the California Department of Social Services. Before assuming my current position, I served as the Bureau Chief for the Resource Development and Training Support Bureau within the CPFSB. Prior to joining the CDSS, I was a child welfare social

1 worker in a few counties in California providing wraparound family services and family  
2 reunification services.

3 4. CDSS is one of sixteen departments and offices within the California Health  
4 and Human Services Agency and is responsible for the oversight and administration of  
5 programs serving California's most vulnerable residents. Our mission is to serve, aid, and  
6 protect needy and vulnerable children and adults in ways that strengthen and preserve families,  
7 encourage personal responsibility, and foster independence. CDSS employs at least 4,200  
8 individuals in 41 offices throughout California.

9 5. The CPFBSB is responsible for pre-placement and in-home services policy  
10 components within child welfare services, including child abuse prevention, as well as  
11 statewide training and staff development activities of public child welfare service workers. In  
12 addition, a wide range of community-based services, including child abuse prevention, and  
13 intervention and treatment services that are designed to increase family strengths and capacity  
14 to provide children with a stable and supportive family environment, are administered in the  
15 Branch.

16 6. My duties as the Branch Chief of CPFBSB include supervising the professional  
17 staff engaged in child abuse prevention programs, and setting policy direction, planning and  
18 goals for the Branch to ensure effective, efficient and equitable management and delivery of  
19 child abuse prevention services. I am also responsible for oversight and development of  
20 California policies related to the integration of child welfare services and mental health,  
21 including the provision of mental health services to screen for and treat trauma in children  
22 involved in the child welfare system. Additionally, my Branch is working with Rady  
23 Children's Hospital to build a trauma informed system of care in California. As a result, my  
24 duties require understanding the effects of trauma children experience due to adverse  
25 childhood experiences.



# Exhibit 53

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7 **UNITED STATES DISTRICT COURT**  
8 **WESTERN DISTRICT OF WASHINGTON**

9 STATE OF WASHINGTON, STATE OF  
10 CALIFORNIA, et al.

11 Plaintiffs,

12 v.

13 UNITED STATES OF AMERICA, et al.,

14 Defendants.

NO. 2:18-CV-00939

DECLARATION OF MAYRA E.  
ALVAREZ IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
EXPEDITED DISCOVERY

15 I, Mayra E. Alvarez, declare as follows:

16 1. I am over the age of 18 and make this declaration based upon my expertise and  
17 personal experiences.

18 2. I am the President of The Children's Partnership (TCP), a nonprofit children's  
19 advocacy organization committed to giving every all children, no matter their background, the  
20 resources and opportunities they need. The work of TCP is dedicated to improving the lives of  
21 underserved children where they live, learn, and play with breakthrough solutions at the  
22 intersection of research, policy, and community engagement. For nearly 25 years, we have  
23 worked to champion policies and offer resources to provide all children with the opportunities  
24 they need to thrive. TCP is a leading voice for children and a critical resource for communities  
25 across California and the nation. We aim to close the opportunity gap confronting too many  
26 children, especially children of color and those living in poverty, by improving health coverage

1 and care and expanding technology tools and opportunities. Our unique approach includes  
2 engaging communities, collaborating with strategic partners, leading with innovative expertise,  
3 and working on research-driven policies.

4           3. I have a decade of experience in public health and health care policy and  
5 community relations. Before coming to TCP, I held several assignments at the U.S.  
6 Department of Health and Human Services (HHS). I served as Director of the State Exchange  
7 Group for the Center for Consumer Information and Insurance Oversight at the Centers for  
8 Medicare and Medicaid Services at the HHS. Prior to this, I served as the Associate Director  
9 for the HHS Office of Minority Health (OMH), where I led the coordination of OMH’s work  
10 related to the Affordable Care Act, community health workers, and language access, and also  
11 served as the Project Director of OMH’s Center for Linguistic and Cultural Competency in  
12 Health Care. Previously, I served as Director of Public Health Policy in the Office of Health  
13 Reform at HHS where I had primary oversight responsibility for coordinated and timely  
14 implementation of the public health, prevention, and health care workforce policy provisions in  
15 the Affordable Care Act. I have served as a bilingual spokesperson on the Affordable Care Act  
16 and other health issues for national and regional broadcast, print and online media,  
17 including *New York Times*, *Washington Post*, *Wall Street Journal*, *Women’s Health*,  
18 *Cosmopolitan*, *Glamour*, National Public Radio, Univision, Telemundo, CNN en Español, and  
19 various state and local outlets. I received my graduate degree from the School of Public Health  
20 at the University of North Carolina at Chapel Hill and my undergraduate degree from the  
21 University of California at Berkeley. New harsh immigration policies and anti-immigrant  
22 rhetoric have instilled a deep and growing fear inside many communities, threatening the  
23 health, security, and well-being of children in immigrant families. Research suggests that  
24 immigration enforcement activities—or the threats associated with immigration enforcement—  
25  
26

1 negatively impact family processes, developmental trajectories, and the social and emotional  
2 development of children.<sup>1</sup>

3 4. Eighteen million children in the U.S.—about a quarter of all children—are part  
4 of an immigrant family. Approximately 88 percent of these children were born in the US while  
5 the other 12 percent were born in a different country.<sup>2</sup> In California, half of all children—4.5  
6 million—are part of an immigrant family. Approximately 92 percent of these children were  
7 born in the US while the other 8 percent were born in a different country.<sup>3</sup> The current anti-  
8 immigrant climate and related policy changes have far-reaching negative impacts, impacting  
9 citizens and noncitizen children alike, many living in fear as to what may happen if their parent  
10 is deported or detained.

11 5. Most recently, the troubling “zero tolerance” policy, which imposes criminal  
12 penalties meant to deter immigrant families from coming to our country seeking asylum,  
13 provides another example of the federal administration’s attack on children. Thousands of  
14 children, some as young as a few months old, have been separated from their parents at the  
15 border because of this new policy. The zero tolerance policy, announced in April by U.S.  
16 Attorney General Jeff Sessions, calls for the Department of Homeland Security to separate any  
17 child crossing the U.S.-Mexico border between ports of entry from the adults with them before  
18 those adults are prosecuted. Once separated from their parent, the conditions at the  
19 immigration detention centers are nothing a child should experience.

22 \_\_\_\_\_  
23 <sup>1</sup> “U.S. Citizen Children Impacted by Immigration Enforcement.” American Immigration Council. June 04, 2018.  
24 Accessed June 29, 2018. [https://www.americanimmigrationcouncil.org/research/us-citizen-children-impacted-](https://www.americanimmigrationcouncil.org/research/us-citizen-children-impacted-immigration-enforcement)  
25 [immigration-enforcement](https://www.americanimmigrationcouncil.org/research/us-citizen-children-impacted-immigration-enforcement).

26 <sup>2</sup> Zong, Jie, Jeanne Batalova, and Jeffrey Hallock. *Frequently Requested Statistics on Immigrants and*  
*Immigration in the United States*. Report. February 27, 2018. Accessed June 29, 2018. [https://www.migration](https://www.migrationpolicy.org/article/frequently-requested-statistics-immigrants-and-immigration-united-states#Children)  
[policy.org/article/frequently-requested-statistics-immigrants-and-immigration-united-states#Children](https://www.migrationpolicy.org/article/frequently-requested-statistics-immigrants-and-immigration-united-states#Children).

<sup>3</sup> “Foreign-Born Population, by Age Group (Regions of 65,000 Residents or More).” Kidsdata.org. Accessed June  
29, 2018. [https://www.kidsdata.org/topic/346/immigration250/table#fint=464&loc=2&tf=79&ch=938,789,935,](https://www.kidsdata.org/topic/346/immigration250/table#fint=464&loc=2&tf=79&ch=938,789,935,936,937&sortColumnId=0&sortType=asc)  
[936,937&sortColumnId=0&sortType=asc](https://www.kidsdata.org/topic/346/immigration250/table#fint=464&loc=2&tf=79&ch=938,789,935,936,937&sortColumnId=0&sortType=asc).

1           6.       Separating children from their family increases symptoms of depression,  
2 anxiety, and withdrawal resulting in psychological distress, academic difficulties, and  
3 disruptions in their development.<sup>4</sup> In the short term, there are changes to bodily functions.  
4 Research overwhelmingly suggests that the biological effects of stress negatively affects a  
5 child’s ability to concentrate, remember things, and control and focus their own thinking.<sup>5</sup> In  
6 the long term, such trauma and high levels of stress places children at risk of heart disease,  
7 diabetes, and cardiovascular disease.<sup>6</sup>

8           7.       Experts have expressed children that are separated from their families and  
9 placed in detention facilities may experience “toxic stress,” which is defined as a prolonged  
10 exposure to highly stressful situations.<sup>7</sup> Toxic stress can disrupt a child’s brain architecture and  
11 inhibit the development of children’s brains overall.<sup>8</sup> It can also keep them from developing  
12 language and social, emotional bonds, and gross motor skills, and the development that they  
13 could possibly have.<sup>9</sup>

14           8.       For the children directly impacted by the separations and the millions of  
15 children in immigrant families across the country, the damage is done. TCP conducted a survey  
16 of health providers in California and found that nearly 90 percent of providers reported an  
17 increase of children in immigrant families experiencing anxiety and fear, which are symptoms  
18

19 \_\_\_\_\_  
20 <sup>4</sup> “Statement of APA President Regarding Executive Order Rescinding Immigrant Family Separation Policy.”  
21 Monitor on Psychology. June 20, 2018. Accessed June 29, 2018. [http://www.apa.org/news/press/releases/  
22 2018/06/family-separation-policy.aspx](http://www.apa.org/news/press/releases/2018/06/family-separation-policy.aspx).

23 <sup>5</sup> Thompson, Ross A. "Stress and Child Development." *The Future of Children* 24, no. 1 (2014): 41-59. Accessed  
24 June 29, 2018. doi:10.1353/foc.2014.0004.

25 <sup>6</sup> “Stress Has Lasting Effect on Child's Development.” February 15, 2012. Accessed June 29, 2018.  
26 <http://www.urbanchildinstitute.org/articles/editorials/stress-has-lasting-effect-on-childs-development>.

<sup>7</sup> National Scientific Council on the Developing Child. (2005/2014). *Excessive Stress Disrupts the Architecture of  
the Developing Brain: Working Paper 3*. Updated Edition. Accessed June 29, 2018. [http://www.developingchild.  
harvard.edu](http://www.developingchild.harvard.edu)

<sup>8</sup> Ibid.

<sup>9</sup> Wise, Justin. “American Academy of Pediatrics President: Trump Family Separation Policy Is 'child Abuse'.”  
June 18, 2018. Accessed June 29, 2018. [http://thehill.com/latino/392790-american-academy-of-pediatrics-  
president-trumps-family-separation-policy-is-child](http://thehill.com/latino/392790-american-academy-of-pediatrics-president-trumps-family-separation-policy-is-child).



1 of trauma, related to their heightened awareness of the possibility of detention and  
2 deportation.<sup>10</sup> Over 70 percent reported an increase in children experiencing symptoms of  
3 depression, such as feelings of sadness, sleeping problems, loss or gain of appetite, loss of  
4 interest in activities they used to enjoy, and almost half stated that children in immigrant  
5 families are increasingly being diagnosed with mental health conditions such as anxiety and  
6 depression.

7           9. Executive Order 13841, “Affording Congress an Opportunity to Address Family  
8 Separation,” signed June 20, 2018 by President Trump, does not resolve this crisis. First, it  
9 does nothing to address the trauma experienced by more than 2,000 children already separated  
10 from their parents. Second, it implies that imprisoning whole families is an acceptable path  
11 forward when we know family detention has repeatedly been found to be unsuitable for  
12 children.<sup>11</sup> The inhumane conditions that these children face while in detention centers—  
13 caged, as well as physically and emotionally neglected—are devoid of compassion and  
14 decency. This policy simply trades one source of childhood trauma for another.

15           10. Detention negatively impacts the health of parents and children. As the Kaiser  
16 Family Foundation noted in a recent publication on family separation, “global studies show  
17 significant effects for children held in detention, including depression, post-traumatic stress,  
18 suicidal thoughts and behaviors, developmental delays, and behavioral issues.”<sup>12</sup> Rather than  
19

20 \_\_\_\_\_  
21 <sup>10</sup> “Healthy Mind, Healthy Future.” The Children’s Partnership. Accessed June 29, 2018. <http://www.childrens-partnership.org/priorities/healthy-mind-healthy-future/>. (The percentages reflected in the one pager represent surveyed providers agreement with each statement (n=151).

22 <sup>11</sup> *Locking Up Family Values, Again*. Lutheran Immigration & Refugee Service and the Women’s Refugee  
23 Commission. Report. October 2014. Accessed June 29, 2018. [https://www.speakcdn.com/assets/2474/lirswrc\\_lockingupfamilyvaluesagain\\_report\\_141114.pdf](https://www.speakcdn.com/assets/2474/lirswrc_lockingupfamilyvaluesagain_report_141114.pdf).

24 <sup>12</sup> “Key Health Implications of Separation of Families at the Border (as of June 27, 2018).” June 27, 2018.  
25 Accessed June 29, 2018. [https://www.kff.org/disparities-policy/fact-sheet/key-health-implications-of-separation-of-families-at-the-border/?utm\\_campaign=KFF-2018-Disparities-Policy&utm\\_source=hs\\_email&utm\\_medium=email&utm\\_content=64117341&\\_hsenc=p2ANqtz--iChgZOuKLvw1iOk06CZJWR3zL1-BGy5oA0\\_mWVPv-hD33P7EXTOD\\_CyYrParWknG3XovNMGiMJVdHJJobywh0PiBU5pFgjI\\_wGSmMQkFLGgRpZlX8&\\_hsmi=64117341](https://www.kff.org/disparities-policy/fact-sheet/key-health-implications-of-separation-of-families-at-the-border/?utm_campaign=KFF-2018-Disparities-Policy&utm_source=hs_email&utm_medium=email&utm_content=64117341&_hsenc=p2ANqtz--iChgZOuKLvw1iOk06CZJWR3zL1-BGy5oA0_mWVPv-hD33P7EXTOD_CyYrParWknG3XovNMGiMJVdHJJobywh0PiBU5pFgjI_wGSmMQkFLGgRpZlX8&_hsmi=64117341).

1 jailing families who are in deportation proceedings, the government should employ alternatives  
2 to detention proven to be more effective while also limiting the long-term trauma to children  
3 and their families. The Kaiser Family Foundation report also found that detaining families and  
4 children is costlier than utilizing alternative programs, such as community-based supervision  
5 and monitoring programs.<sup>13</sup> These alternatives can be based on an individualized assessment of  
6 each family in order to support the well-being of children and ensure court appearance and  
7 compliance with any final court orders.<sup>14</sup>

8  
9 11. In conclusion, separating children from their families or detaining children in  
10 family prisons is not in the public health interest of the country or its residents.

11 I declare under penalty of perjury under the laws of the State of California and the  
12 United States of America that the foregoing is true and correct.

13 Executed on this twenty-ninth day of June, 2018 in Los Angeles, CA.

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17 \_\_\_\_\_  
18 Mayra E. Alvarez  
19 President  
20 The Children's Partnership

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22 <sup>13</sup> "Key Health Implications of Separation of Families at the Border (as of June 27, 2018)." June 27, 2018.  
23 Accessed June 29, 2018. [https://www.kff.org/disparities-policy/fact-sheet/key-health-implications-of-separation-of-families-at-the-border/?utm\\_campaign=KFF-2018-Disparities-Policy&utm\\_source=hs\\_email&utm\\_medium=email&utm\\_content=64117341&\\_hsenc=p2ANqtz--iChgZOuKLvw1iOk06CZJWR3zL1-BGy5oA0\\_mWVPv-hD33P7EXTOD\\_CyYrParWknG3XovNMGiMJVdHJJobywh0PiBU5pFgjI\\_wGSmMQkFLGgRpZIX8&\\_hsmi=64117341](https://www.kff.org/disparities-policy/fact-sheet/key-health-implications-of-separation-of-families-at-the-border/?utm_campaign=KFF-2018-Disparities-Policy&utm_source=hs_email&utm_medium=email&utm_content=64117341&_hsenc=p2ANqtz--iChgZOuKLvw1iOk06CZJWR3zL1-BGy5oA0_mWVPv-hD33P7EXTOD_CyYrParWknG3XovNMGiMJVdHJJobywh0PiBU5pFgjI_wGSmMQkFLGgRpZIX8&_hsmi=64117341).

24  
25 <sup>14</sup> *Locking Up Family Values, Again*. Lutheran Immigration & Refugee Service and the Women's Refugee  
26 Commission. Report. October 2014. Accessed June 29, 2018. [https://www.speakcdn.com/assets/2474/lirsorc\\_lockingupfamilyvaluesagain\\_report\\_141114.pdf](https://www.speakcdn.com/assets/2474/lirsorc_lockingupfamilyvaluesagain_report_141114.pdf).

# Exhibit 54

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7 **UNITED STATES DISTRICT COURT**  
8 **WESTERN DISTRICT OF WASHINGTON**

9 STATE OF WASHINGTON,

10 Plaintiff,

11 v.

12 DONALD TRUMP in his official capacity  
as President of the United States, et al.,

13 Defendants.

NO.

DECLARATION OF DR. JOSEPH  
GALLEGOS IN SUPPORT OF  
MOTION FOR A PRELIMINARY  
INJUNCTION

14  
15 I, Joseph Gallegos, declare as follows:

16 1. I am over the age of 18 and have personal knowledge of all the facts stated  
17 herein.

18 2. I have a doctorate in social work from the University of Denver, a master's  
19 degree in social work from Portland State University ("PSU"), and a B.S. in psychology from  
20 PSU.

21 3. I am currently a member of the Oregon Commission on Hispanic Affairs. From  
22 2013-2017, I was a member of the Oregon House of Representatives, representing the Hillsboro  
23 area in Washington County, Oregon, an area that has a Latino population of over 20 percent.

24 4. My background is that I was born in San Antonio, Texas. My parents moved to  
25 Portland during WWII to work in shipyards. After the war, the family transitioned to summer  
26

1 farm-work—living in migrant worker camps throughout the Willamette valley and finishing  
2 the season picking hops in Yakima valley. At 17, I spent my last summer working in the  
3 fields. I spent the next ten years working in the Portland shipyards while completing my Viet  
4 Nam era military duty with one year in the regular US Air Force and three years with the  
5 Oregon Air National Guard. While working in the shipyard, I also attended night school at  
6 Portland Community College and then PSU. At PSU, I earned a Bachelor of Science degree in  
7 psychology with a minor in sociology and a certificate in social work. I went directly into the  
8 MSW program at Portland state where my practicum experiences included an internship at the  
9 JD Long Juvenile Detention Center; Family Counseling (with Latino and Native American  
10 families) in NW Portland and community organizing with SE Impact; and as a Teaching  
11 Assistant with a student clinical unit at the Salem mental hospital and finally as an instructor  
12 during my final semester teaching a course on “Chicano Mental Health” to first-year MSW  
13 students.

14 5. In my professional opinion, experience and understanding, the federal  
15 government’s family separation policy has created significant trauma within Oregon’s  
16 immigrant community (and nationwide). My local area in Washington County, Oregon has  
17 experienced a large number of immigration-related family separations when parents are taken  
18 from their children, and the same is very probably occurring with the parents and children who  
19 have been subject to the federal government’s latest policy. This often leads to a toxic stress  
20 reaction on the part of both children and parents. Toxic stress is cumulative and permanent and  
21 affects an individual both physiologically and psychologically.

22 6. Toxic stress from family separations often causes illness in children, causes  
23 them to miss school or to act out at school. It often affects their academic performance. In  
24 Oregon, almost 25 percent of the K-12 school population is Latino, so the effect is felt  
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7. This is also concerning with regard to Oregon's economic future. These students are the future workforce of the state.

I declare under penalty of perjury under the laws of Oregon, Washington and the United states that the foregoing is true and correct.

DATED this 29 day of June, 2018 at Hillsboro, Oregon

  
Dr. Joseph Gallegos

# Exhibit 55

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7 **UNITED STATES DISTRICT COURT**  
8 **WESTERN DISTRICT OF WASHINGTON**

9 STATE OF WASHINGTON,

10 Plaintiff,

11 v.

12 DONALD TRUMP in his official capacity  
as President of the United States, et al.,

13 Defendants.  
14

NO. 2:18-cv-00939-RAJ

DECLARATION OF LINDA  
CASTILLO

15 I, Linda Castillo, declare as follows:

16 1. I am over the age of 18 and have personal knowledge of all the facts stated herein.

17 2. I am the Chair of the Oregon Commission of Hispanic Affairs ("Commission").

18 The Commission was created by the 1983 Oregon Legislative Assembly to work for the  
19 implementation of economic, social, legal, and political equality for Hispanics in Oregon. The  
20 Commission monitors existing programs and legislation to ensure that the needs of Hispanics in  
21 Oregon are met. The Commission researches problems and issues and recommends appropriate  
22 action, maintains a liaison between the Hispanic community and government entities, and  
23 encourages Hispanic representation on state boards and commissions.

24 3. I have an M.S. in Clinical Psychology from the University of San Francisco and  
25 a B.S. in Psychology from the University of Santa Clara. I have worked for 26 years in local  
26



1 government in Clark County, Washington, and Multnomah County, Oregon, as a mental health  
2 consultant, program manager and director and also in nonprofits and in direct service to  
3 communities of color and managing, providing technical assistance to teams working with  
4 diverse communities in the Bay Area, Chicago and the Pacific NW. I have focused in my career  
5 on diversity and equity consulting and mental health cultural issues. In the state of Washington,  
6 I am certified as an Ethnic Minority Mental Health specialist with ethnic minorities but in  
7 particular Latino adults and children. I provide consultation to several Mental Health agencies  
8 in SW Washington. I currently work at the City of Portland in the office of Neighborhood  
9 Involvement's New Portlanders Program whose charge is immigrant and refugee integration.

10 4. My background is that I am a bilingual, bicultural first-generation Latina of  
11 Mexican heritage. My parents are from the Zacatecas and Michoacán. I was born and raised in  
12 Northern California as the eldest daughter of farm workers, I am the first in my family to graduate  
13 from high school, attend college, and complete graduate school with a Masters in Clinical  
14 Psychology. As a seasoned Qualified Mental Health Professional in practice, I provided  
15 culturally specific and bilingual services to Latino families.

16 5. In my professional opinion, experience and understanding, the federal  
17 government policy of separating families and children will likely cause families to experience  
18 toxic stress and perpetuate fatal outcomes. Toxic stress can be either internalized such that a  
19 person, particularly a child, can emotionally and physically shut down and refuse to eat and/or  
20 eat and/or sleep excessively. Toxic stress can also be externalized, as evidenced by extreme,  
21 inconsolable crying, temper tantrums, anxious restlessness, hypervigilance, acting out  
22 aggressively, and even engaging in self-harm (i.e. headbanging, cutting) because no self-  
23 soothing, calming, or comforting opportunities are offered to mitigate the stress the children are  
24 experiencing. Continuous exposure to high levels of stress of the unknown or not knowing what  
25 will happen next when separated from a parent or trusted caretaker affects the child's brain

1 development in a way similar to that experienced by kidnap victims, prisoners of war or sufferers  
2 of PTSD. Unborn children and child brain development is particularly vulnerable to extreme  
3 stress because it is still developing, growing, and it can lead to abnormal neurological  
4 development and overload the brain with stress hormones (neurotransmitters) which  
5 communicate with brain cells and will continue to trigger a stress response and psychical  
6 reactions throughout the body and remain on high alert. Too much toxic stress has an extremely  
7 debilitating effect and at worse be fatal leading to self-harm or suicidal behaviors.

8         6. Children separated from their parents, even when they are ultimately reunited,  
9 can suffer extreme separation anxiety, for example refusing to go to school and be away or out  
10 of sight of from family members. Fear is debilitating. In fact, this effect is also occurring among  
11 immigrant families in Oregon who have not been separated as they are afraid of separation or  
12 that their parent will not be home when they return from school. Parents also are suffering  
13 feelings of excessive hopelessness and helplessness, in some cases leading to symptoms such as  
14 depression, anxiety disorders and retriggering post-traumatic stress disorders. At baseline these  
15 families stress response will be magnifying their reactivity to stress throughout their life time;  
16 leading to considerable health impacts such as increased cardiac conditions, high blood pressure,  
17 diabetes, and increased potential for strokes. Bottom line it alters bodies, it alters brains, and it  
18 negatively alters health.

19         7. The 'Zero Tolerance' policies which separate families are dangerous, cruel,  
20 inhuman and a violation of basic human and legal rights. The Latino culture values and reveres  
21 family as sacred, the centerpiece of our existence. To tear a child away from their parent or  
22 trusted caretaker is akin to driving a stake into the very heart of our Latino communities and  
23 cultural traditions. Let us not return to a mindset that creates polices that institutionalize and  
24 condone genocide of ethnic and cultural communities here in the USA. We are a nation of  
25 nations, that is our strength and that diversity is what makes us stronger, beautiful and brighter.

1 We all deserve an opportunity to pursue the American Dream and not be subjected to the  
2 American nightmare that separates children, babies from their parents and  
3 loved ones. We are better than this.

4  
5 **I declare under penalty of perjury under the laws of Oregon, Washington and the**  
6 **United States that the foregoing is true and correct.**

7 DATED this 29 day of June, 2018 at Portland, Oregon

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Linda Castillo

# Exhibit 56

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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON,

Plaintiff,

v.

DONALD TRUMP in his official capacity as  
President of the United States, et al.,

Defendants.

NO.

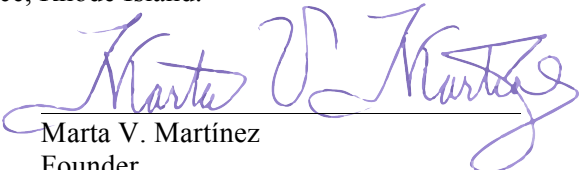
DECLARATION OF MARTA V.  
MARTINEZ IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION

I, Marta V. Martínez, declare as follows:

1. I am over the age of 18 and have personal knowledge of all the facts stated herein.
2. I am the Founder of the Coalition of Advocates for Student Opportunities in Rhode Island.
3. Through my work with members of Rhode Island's immigrant community who are seeking higher education opportunities, I have observed the negative impact that the family separation policy has had on Rhode Island's young people.
4. The family separation policy has caused these children to suffer trauma that will negatively impact their ability to function and succeed in the classroom, and thereby impair their ability to seek higher education opportunities.

I declare under penalty of perjury under the laws of the State of Rhode Island and the United States of America that the foregoing is true and correct.

DATED this 29<sup>th</sup> day of June, 2018 at Providence, Rhode Island.



Marta V. Martínez  
Founder  
Coalition of Advocates for Student  
Opportunities in Rhode Island

# Exhibit 57



1           3.       I have held academic positions for over 30 years, including the following:  
2       Courtesy Clinical Professor, Department of Psychiatry and Behavioral Sciences, University  
3       of Washington (2015-present); Clinical Assistant Professor, Smith College School for Social  
4       Work (2011-2012); Adjunct Professor of Clinical Psychology, Washington School of  
5       Professional Psychology (2006-2009); Professor of Psychology, Washington School of  
6       Professional Psychology (2001-2006); Clinical Professor of Psychology, University of  
7       Washington (1980-1997); Acting Assistant Professor of Psychology, University of  
8       Washington (1978-1980); Assistant Professor of Psychology, Southern Illinois University at  
9       Carbondale (1977-1978).

10           4.       For nearly 40 years, since 1979, I have maintained a private practice of  
11       psychotherapy, expert consultation, and forensic psychology. I also supervised clinical  
12       psychology and social work graduate students, as the Director and Founder of the Fremont  
13       Community Therapy Project, a clinic for low-income individuals, between 2006 and 2015.

14           5.       One of my areas of expertise, and a focus of my clinical, forensic, and  
15       academic work, is the assessment and treatment of the psychological and psychosocial effects  
16       of trauma exposure. My work includes substantial psychological treatment, supervision of  
17       treatment, and expert evaluation of adults with psychological conditions arising from  
18       childhood traumatization (e.g. child abuse and neglect, parent-child separation, sexual abuse  
19       and violence, abuse of authority and institutional betrayal) as well as adults experiencing  
20       harm from recent traumatic events (e.g. domestic violence, rape and other sexual violence,  
21       hostile work environment and harassment at work or at school, abuse in the foster care  
22       system). I have evaluated and treated persons who, as children, were removed from their  
23       parents' home as part of child dependency proceedings and suffered abuse in the foster care  
24       system, as well as immigrant and refugee women fleeing violence who were seeking asylum  
25       or visas to remain in the United States.  
26



1           6.       I am an active member and leader in a number of professional organizations  
2 devoted to trauma and trauma recovery, including the American Psychological Association  
3 Division of Trauma Psychology, of which I am a former President, the International Society  
4 for Traumatic Stress Studies, and the International Society for the Study of Trauma and  
5 Dissociation. I helped to shape and develop best practices and guidelines for the treatment of  
6 Post Traumatic Stress Disorder (PTSD) as a member of the Guidelines Panel of the American  
7 Psychological Association that developed Clinical practice guidelines for the treatment of  
8 PTSD in Adults (February 2017). I have been appointed and served as co-editor of special  
9 issues of two peer-reviewed journals on treatment of PTSD.

10           7.       My academic work includes professional editorial board service on 16  
11 different professional journals since 1980, including the following devoted to trauma: Journal  
12 of Traumatic Stress; Psychological Trauma: Theory, Research, Practice, Policy; and the  
13 Journal of Trauma and Dissociation, for which I am the Associate Editor for Clinical Issues.  
14 I have authored 14 books, and over 150 articles and chapters in professional journals or  
15 books, many of which deal with issues of trauma, including the following:

16 Ellis, A., Simiola, V., Brown, L.S., Courtois, C.A. & Cook, J. M. (2018). Effect of evidence-  
17 based treatment relationships on treatment outcome for adults with trauma: A systematic  
18 review. *Journal of Trauma and Dissociation*, 19, pp. 185-213;

19 Brown, L. S. (2017). Feminist And Multicultural Perspectives In Trauma Psychology. In S.  
20 Gold, C. Dalenberg & J. Cook (Eds). *APA Handbook Of Trauma Psychology* (pp. 501-526).  
21 Washington DC: American Psychological Association;

22 Brown, L.S. (2013). *Treating The Effects Of Psychological Trauma*. In G. Koocher, J.C.  
23 Norcross, and B. Greene (Eds). *Psychologists' Desk Reference (Third Ed.)*(pp. 289-293).  
24 New York NY: Oxford University Press;

1 Brown, L.S. (2009). *Cultural Competence In The Treatment Of Complex Trauma*. In C.  
2 Courtois & J. Ford (Eds.) *Treating Complex Traumatic Stress Disorders: An Evidence-Based*  
3 *Guide*. New York NY: Guilford Press; and

4 the text, *Cultural Competence In Trauma Treatment: Beyond The Flashback*, published in  
5 2008 by the American Psychological Association.

6 In addition, I was chosen by the American Psychological Association to be the therapist  
7 demonstrating trauma treatment for the APA Psychotherapy Video Series in the videos titled  
8 *Treating Women Survivors Of Abuse* and *Treating Men Survivors Of Abuse*.

9  
10 8. I have been recognized with over 30 professional honors, awards, and  
11 fellowships throughout my career, including the Sarah Haley Award for Clinical Excellence  
12 from the International Society for Traumatic Stress Studies, “Fellow” status from the  
13 International Society for the Study of Trauma and Dissociation, and the Lifetime  
14 Achievement Award of the Division of Trauma Psychology of the APA. I have also received  
15 the Social Justice and Distinguished Psychologist Awards of the Washington State  
16 Psychological Association, and the award for Distinguished Professional Contributions to  
17 Public Service from the American Psychological Association.

18 9. I have been qualified as an expert on the topic of psychological trauma in  
19 federal courts as well as in state courts in Washington, Oregon, Alaska, California, and  
20 Illinois. A true and correct copy of my full C.V. is attached as Exhibit A.

21 10. The following opinions and testimony are based upon my education and  
22 experience, and the research and scholarship in the field of trauma psychology, and are  
23 extended on a more probable than not basis to a reasonable degree of psychological certainty.  
24 In forming my opinions, I am also guided by the leadership of my professional organization,  
25 the American Psychological Association, and embrace and incorporate by reference herein  
26 the APA’s policy statement against forcible family separation, as set forth in Exhibit B, as

1 well as the letter written by APA’s President, Dr. Jessica Henderson Daniel to the U.S.  
2 Departments of Justice and Homeland Security expressing her professional opinion on this  
3 matter, as set forth in Exhibit C. The references in this declaration are in short form; the  
4 complete citations are included at the end of the declaration.

5 **II. Forcible Family Separation Causes Short Term and Long Term Damage**

6 11. As set forth in greater detail below, the forcible separation of children from  
7 their good-enough and loving parents, as the United States government is currently doing to  
8 immigrant families on the southern border, hereinafter “Family Separation,” is likely to cause  
9 immediate, acute, harm as well as reasonably foreseeable long-term damage and harm to  
10 both the parents and the children (Rojas-Flores, Clements, Koo, & London, 2017).  
11 Psychological harms are also accruing now to the citizens and legal residents of Washington  
12 and the United States as a result of these actions by the Federal government.

13 **A. Trauma and Its Effects on Psychological and Physical Health**

14 12. Traumatic stressors include a range of experiences that threaten the safety or  
15 life of humans (American Psychiatric Association, 2013, Dalenberg, Straus & Carlson,  
16 2017). Family Separation is, by and of itself, a disruption to the bonds of attachment between  
17 good-enough parents and their children and constitutes a traumatic stressor. Grief and  
18 bereavement can also be traumatic when the circumstances of the loss are unusually painful  
19 and out of control of the persons experiencing loss, as is the case for the parents and children  
20 subject to Family Separation. (Pearlman, Wortman, Feuer, Farber & Rando, 2014). Extensive  
21 research conducted over the past fifty years documents short and long-term effects on  
22 physical and mental health of one-time and repeated trauma exposures in childhood and  
23 adulthood (Gold, Cook, & Dalenberg, 2017). Trauma is a biopsychosocial as well as  
24 spiritual/existential challenge to human beings, and affects its targets on all of those variables  
25 (Brown, 2008).  
26

1           13.     The likely effects and consequences of traumatic stress and trauma exposure,  
2 like Family Separation, include the following: depressed mood, anxiety, panic, terror,  
3 intrusive thoughts, social withdrawal, substance abuse, suicidality, increased risk of acting-  
4 out behaviors, self-harm, complicated grief, problematic relationships, difficulties in  
5 parenting, health problems, hopelessness, helplessness (Gold, Cook & Dalenberg, 2017).  
6 These problems can be long-lasting and at times are disabling and debilitating.

7           14.     If it cannot be prevented, traumatic stress can be effectively treated. The  
8 sooner that treatment is offered, the more likely a person is to recover to their prior level of  
9 functioning. Post-traumatic symptoms that persist over time are less amenable to even the  
10 most effective of treatments and may become disabling. A number of effective treatments are  
11 now available for traumatized people. These include, treatments for children-Trauma-  
12 Focused CBT (TF-CBT) and Eye Movement Desensitization Reprocessing (EMDR) – and  
13 for adults - EMDR, Prolonged Exposure (PE) and Cognitive Processing Therapy (CPT).  
14 EMDR, PE and CPT are utilized by the Veterans’ Administration, for example, in the  
15 treatment of combat veterans with PTSD. These treatments have been developed for  
16 individuals experiencing a one-time trauma exposure, and are not known to be as effective  
17 with people having repeated trauma exposures (American Psychological Association,  
18 Guideline Development Panel for the Treatment of PTSD in Adults (2017 February). *Clinical*  
19 *practice guideline for the treatment of Posttraumatic Stress Disorder (PTSD) in adults.*  
20 Retrieved from: <http://www.apa.org/about/offices/directorates/guidelines/ptsd.pdf>.

21           15.     Under the right conditions, and with the right supports, people can make  
22 substantial recovery from trauma exposures. In addition to appropriate psychotherapeutic  
23 treatments, a number of other important psychosocial factors improve the likelihood of a  
24 person’s recovery to their prior adequate-to-good psychological functional capacities. These  
25 factors include the availability of social and familial support, religion and faith, and an  
26

1 optimistic temperament. Children are particularly dependent upon the family structure, and  
2 on parental love, care, and attachment, to cope with traumatic stress. Normally, parents serve  
3 as a “buffer” and protective force between youth and outside stressors. Under the Family  
4 Separation policy, then good-enough parents are forcibly separated, and made unavailable to  
5 their children, children are doubly harmed: they experience the acute stress of the separation  
6 and also are undermined in their ability to handle and recover from that and other traumas in  
7 their lives. Alternatively, when good-enough parents are available, their presence is a  
8 powerful protective and mitigating factor assisting children in being both resilient in the face  
9 of trauma and recovering from trauma when they have been affected by it (Bolton, Jordan,  
10 Lubin & Litz, 2017).

11           16. Trauma of human origin has long been identified as worse for its targets than  
12 are natural disasters. This is because human agency or neglect in causing or allowing trauma  
13 to occur undermines our necessary human capacities to trust in one another. We rely, as  
14 human beings, on other humans keeping implicit social contracts to care for and protect one  
15 another, based in evolutionary requirements for humans to relate to one another in order to  
16 survive (Figley, Ellis, Reuther & Gold, 2017).

17           17. People also rely on powerful institutions, which stand as proxies for our  
18 relationships to the larger society, to protect us when we come to them for help in our time of  
19 need. When those institutions betray trust, either by failing to protect or by putting people in  
20 the way of more harm, then people suffer from Institutional Betrayal. (Smith & Freyd,  
21 2014). Institutional betrayal is by and of itself a form of trauma. When combined with other  
22 traumatic stressors, it increases the severity of distress felt by the traumatized person and  
23 complicates the process of recovery from trauma. When people witness or observe an  
24 institution betraying other people, their own trust in that institution is affected and they may  
25 experience trauma as well.  
26

1           18.     Until very recently, most people around the world have perceived the U.S. as a  
2 beacon of hope and safety, a potential place of refuge should their country of origin become  
3 too dangerous. The words of The New Colossus, the poem engraved within the Statue of  
4 Liberty, speak to this image of the U.S. People flee here for safety because this is a country  
5 of laws and constitutional protections, of equality of opportunity and care for the vulnerable,  
6 of access to legal redress when injustice has been done. The families impacted by Family  
7 Separation, many of whom report that they are seeking asylum in the U. S., a country in  
8 which they placed their faith and trust, are in my opinion likely experiencing institutional  
9 betrayal at the hands of a government that they had hoped would protect them and at least  
10 would operate consistently with the rule of law. This institutional betrayal adds a layer of  
11 severity and complexity to the trauma of forced Family Separation.

12                   **B. Effects of Forced Family Separation on Children**

13           19.     Family Separation is a traumatic loss for the children who are separated from  
14 their parent, as a result of which they are likely to experience a range of problematic  
15 emotions, including terror, fear, sadness and grief, confusion, and distrust. Even when a  
16 parent has been abusive to a child, separating the child from the parent is perceived as painful  
17 by the child; when the parent is loving and caring, and offers secure attachment, a forced and  
18 sudden separation is a profound trauma and loss for that child. Family Separation is likely to  
19 cause immediate and extreme psychological harm, including post-traumatic symptoms such  
20 as nightmares, and other manifestations of anxiety and depression, all of which are likely to  
21 increase in severity the longer the separation lasts and lead to the potential development of  
22 problematic coping strategies in both the near and long term. It is likely that Family  
23 Separation will cause permanent harm to many of the children who are forcibly separated  
24 from good-enough and loving parents, impairing their psychological, mental, social and  
25 physical development well into their lives, and resulting in long-lasting psychological injury  
26

1 and conditions, including PTSD, and other trauma-related disorders. *See* the well-  
2 documented literature on Adverse Childhood Experiences (ACES)  
3 ([https://www.samhsa.gov/capt/practicing-effective-prevention/prevention-behavioral-](https://www.samhsa.gov/capt/practicing-effective-prevention/prevention-behavioral-health/adverse-childhood-experiences)  
4 [health/adverse-childhood-experiences](https://www.samhsa.gov/capt/practicing-effective-prevention/prevention-behavioral-health/adverse-childhood-experiences), doi June 16<sup>th</sup>, 2018).

5           20. While the separation of a child from a good enough primary adult caregiver is  
6 traumatic in any event, many factors present in the Federal government’s current Family  
7 Separation policy increase the traumatic nature of these separations. These include: the lack  
8 of information available to the children about why they are being separated from their  
9 parents; the suddenness of the separation and lack of opportunity to say goodbye; the lack of  
10 an opportunity to plan for and discuss the separation with their parents; the effect of the  
11 child’s developmental stage on their capacities to make sense of what is occurring, leading to  
12 self-blame, particularly on the part of much younger children; fear about what is happening  
13 to the parent, and, given the circumstances that have led some of these families to leave their  
14 country of origin and seek asylum, fear that the parent may have been taken away to be killed  
15 or disappeared (Rojas-Flores, Clements, Koo, & London, 2017).

16           21. For the children and families who are attempting to escape endemic and  
17 sometimes government-sanctioned violence in their countries of origin, and those who have  
18 been exposed to high levels of violence and trauma prior to this new traumatic event, the  
19 impact of the Family Separation is even more severe (Suárez-Orozco, Bang, & Kim, 2010).

20           22. Taking children from their good-enough parents creates additional risks that  
21 arise during the process of placing children into non-family care. These children are now  
22 being kept in temporary holding spaces, institutional settings, or foster homes of strangers.  
23 Even the very best of institutions and foster homes cannot match the love and care given by a  
24 protective parent; in some instances, sadly, institutions and foster homes become places in  
25 which already-vulnerable children are exposed to physical, emotional, and sexual abuse or  
26

1 neglect. The psychological cost to the children subjected to Family Separation thus can grow  
2 exponentially.

3           23. Studies of other children similarly separated from their families in institutional or  
4 foster homes reveal that they suffer attachment loss and traumatic bereavement, leading to  
5 the development of a wide range of physical and psychological symptoms (Wilt, Maltby &  
6 Cook, 2017, Evans-Campbell, Pearson, Walters & Campbell, 2012). Children subject to  
7 Family Separation are likely to experience deterioration of their mental condition and sense  
8 of well being, and develop psychologically abnormal conditions with diagnoses including:  
9 anxiety, depression, and PTSD. Many of these children are likely to manifest short-term  
10 symptoms of this trauma, including crying, difficulty sleeping, difficulty eating,  
11 aggressiveness/acting out, regression (e.g., losing language abilities or toilet training), or  
12 withdrawal from others. Others may appear stoic, strong, hardened, and brave – especially  
13 in circumstances where they have lost trust in adults, or are surrounded by strangers who may  
14 not speak their language, and thus feel unsafe to expose their vulnerability. It is likely that  
15 this sub-group of Family Separation children are experiencing dissociation, an involuntary  
16 psychological defense against overwhelming and intolerable terror in a situation from which  
17 there is no escape (Steele, Boon, & Van der Hart, 2017). Dissociation at the time of trauma is  
18 a predictor of more persistent and severe post-traumatic symptoms later in life. All children  
19 subject to Family Separation are likely to be experiencing trauma and have had damage done  
20 to their psychological well being, regardless of the coping mechanism they use to address it.  
21 Longitudinal research on traumatized children (Putnam, 1997, Widom, 1999, Widom,  
22 Horan, & Brzustowicz, 2014) has shown that for many such children, trauma has a “sleeper  
23 effect,” with symptoms going underground and not appearing until later in life.

24           24. Children who are separated from good enough parents during critical periods  
25 of child development experience attachment loss at a period that is likely to result in lasting  
26



1 damage to their relationships with their parents, to their social development and their  
2 capacity to develop trusting relationships, to their behavioral development, and to their  
3 physical health. The harm to the children is likely to be greater if the separation is prolonged.  
4 Our best data about the effects of involuntary separation from parents comes from observing  
5 the trajectory of American Indian (Evans-Campbell, Pearson, Walters & Campbell, 2012),  
6 Canadian First Nations (Wilt, Maltby & Cook, 2017), and Australian Aboriginal children  
7 (Aboriginal Legal Services of Western Australia, 1995) who were taken forcibly from their  
8 loving families and placed into institutional care. In these populations of people who were  
9 forcibly separated by a government from loving families and cultures, the rates of a variety of  
10 physical and mental illnesses are very high and higher than in the general population. There  
11 is documented excess occurrence of depression, anxiety, substance abuse disorders and other  
12 compulsive acting-out disorders, PTSD and suicidality. These populations of people also  
13 have much higher rates of illness and premature death than the general population. They are  
14 more likely to serve time in prison, more likely to be homeless, and less likely to complete  
15 their education. The populations of indigenous people who have experienced this kind of  
16 government-caused forcible separation from good enough parents are large enough that these  
17 data are robust and can likely be generalized to our understanding of other groups of children  
18 similarly treated.

19           25. In the present Family Separation situation, similar to what happened to the  
20 indigenous peoples of the U.S., Canada, and Australia, the children are being forcibly  
21 separated from parents, many of whom are loving and protective, and many of whom report  
22 that they were willing to risk much to flee an unsafe situation and get their children to safety.  
23 Even if and when these children are reunited with their parents, the children's sense of safety  
24 and capacity to trust in their parents has now been undermined; this experience is likely to  
25 cause long-term damage and undermine their trust in those parents' ability to be able to  
26

1 protect them in the future (Chaudry, 2011). In my experience, many adults in treatment for  
2 the long-term effects of childhood trauma still struggle to make emotional sense of decisions  
3 and actions of their parents even when they can intellectually comprehend them. These adults  
4 still experience pain and suffering from those decisions. For the children, all of this is simply  
5 inexplicable fear and loss, and is often a source of anger against the parent who they believe  
6 has failed them. It is common for the child to turn its anger on the nearest person, and the  
7 previously most trusted person - the parent –and not the U.S. government.

8  
9 26. The impact of the trauma from Family Separation is worsened by the presence  
10 of institutional betrayal (Smith & Freyd, 2015). In this case, it is the Federal government that  
11 has decided to separate these families. This policy has psychological consequences; it  
12 undermines trust and overall sense of well being, and creates a sense in those directly  
13 affected and those who are observing it, of being at risk, rather than protected, by  
14 government and institutions. We can see this phenomenon in the populations of indigenous  
15 adults who were forcibly separated as children from loving families by governments. U.S.  
16 resident and citizen children who become aware of the Family Separation policy through the  
17 news media are also likely to suffer psychological harm, especially those who previously  
18 immigrated to the United States or those who share an ethnic identity with the children  
19 subjected to forcible separation from their parents via the process of insidious traumatization  
20 (Root, 1992), in which trauma occurring to those who resemble us or remind us of ourselves  
21 can become traumatizing to the observer.

22 27. Forcible separation of a child from a parent, through incarceration or detention  
23 of that parent, constitutes an Adverse Childhood Experience (ACE). As such, Family  
24 Separation constitutes an ACE. Children who experience two or more ACES are more likely  
25 to experience long-term psychological and behavioral problems, such as depression, anxiety,  
26 and substance abuse, as well as chronic physical conditions including heart disease,

1 pregnancy loss, and early death. ACES are a well-documented phenomenon that has been  
2 publicized by the United States Department of Health and Human Services  
3 ([https://www.samhsa.gov/capt/practicing-effective-prevention/prevention-behavioral-  
5 health/adverse-childhood-experiences](https://www.samhsa.gov/capt/practicing-effective-prevention/prevention-behavioral-<br/>4 health/adverse-childhood-experiences) doi June 16 2018). As a result of Family Separation,  
6 the Federal government is causing harm, and aggravating pre-existing vulnerabilities of those  
7 who may already be at risk, by adding at least one ACE (separation from a parent, parental  
8 incarceration) to the lives of the children involved. It is also removing the most potent and  
9 effective protective factor for children at risk, the presence of a protective good enough  
10 parent.

### 11 **C. Effects of Family Separation on Parents**

12 28. Parents who arrive together with their children at the U.S. border, and then are  
13 separated from their children by the U.S. government, are likely to experience immediate and  
14 acute psychological harm and injury as a result of that sudden forced separation. A parent's  
15 foremost duty is to care and protect their child. This duty of care for children is hard-wired  
16 into our DNA by evolution (Schore, 2003). Because humans are born unable to care for  
17 themselves, and thus require care from a parent for many years, it is a survival necessity for  
18 parents to care for and protect their children (Siegel, 2012). When a child is forcibly and  
19 suddenly taken from a parent, the parent is likely to experience that separation as a traumatic  
20 loss, leading to feelings of fear, worry, and terror about their child's safety and well-being,  
21 and to shame and a sense of failure due to this out-of-control inability to care and protect  
22 their child. They are also likely to experience continuing sadness and grief at the separation.  
23 In addition, in the current circumstance of Family Separation, many parents are being  
24 separated from their children suddenly without the chance to prepare the child or even say  
25 goodbye, without knowing where they or their children will be taken, without any guarantee  
26 of reunification, and often without contact with their children or with long gaps in that

1 contact. For those parents who come to the border reporting that they have already suffered  
2 trauma through violence exposures in their countries of origin, and for those reporting that  
3 they have fled to the U.S. in the hope of protecting their children and saving their children's  
4 lives, these forcible separations are a painful and terrifying betrayal by a government.

5         29. These parents are likely to experience deterioration of their mental and  
6 physical health in the aftermath of the forcible separation from their children with symptoms  
7 including: anxiety, depression, PTSD, and other trauma-related disorders. Often they will  
8 show short term symptoms of this harm, including depressed mood, nightmares, intrusive  
9 thoughts, hypervigilance, suicidality, disordered eating, self-harm, substance abuse, and  
10 emotional and social withdrawal. As discussed in the section on children's trauma responses,  
11 some of these parents may appear stoic and strong in the face of this loss. As with their  
12 children, however, that may be evidence that the trauma is so great that the parent has  
13 dissociated from the pain. This dissociation can, in turn, predict greater symptom severity  
14 over time.

15         30. In some cases, parental trauma from separation from their children will  
16 become unbearable because their available coping mechanisms may be overwhelmed by the  
17 sudden loss of the important role of parent and protector of the child. In such cases, it is not  
18 unreasonable to expect some parents to attempt to take their own lives out of terror and  
19 despair. I am aware of media reports of at least two suicides of parents forcibly separated  
20 from their children at the U.S. border. These separations have, in effect, permanently  
21 destroyed these parents' hope that they might some day raise their children in relative safety.

22         31. There is long-term damage to the adults who experience trauma. These  
23 parents have experienced a profound betrayal by the government of the U.S. Their children  
24 have been "disappeared" by the Federal government. In Latin America, children who have  
25 been disappeared by a government have often been killed; thus, the governmental  
26

1 disappearance of a child carries with it a particular form of terror for parents from Latin  
2 America. This forcible separation can undermine the families even once they are reunited, as  
3 both parent and child will be suffering the effects of the separation. The parents will be  
4 impaired in their capacities to parent at a time when the children, also suffering, will be more  
5 than ever in need of their parents' love and care. Research on children of mothers with  
6 depression, which may characterize many of these parents, indicates that their children are at  
7 higher risk for a range of psychological disorders and behavioral problems. These problems  
8 affect children's school functioning, and can lead to conflict and disruption of relationships  
9 within families (Canadian Paediatric Society, 2004). It is reasonable to extrapolate from this  
10 robust body of knowledge about depressed parents in general to the parents suffering Family  
11 Separation, whose depressed mood will thus affect their children's functioning.

12 32. Because of the harms done to psychological and physical well-being by this  
13 forcible separation from their children, and the concurrent loss of positive coping strategies  
14 inherently required for being a parent, these parents are likely to have increased needs for  
15 both mental health and medical treatment. I can predict this given the known biological and  
16 psychological consequences of prolonged traumatic stress, of which this forcible separation  
17 is an example. These parents will need access to trauma-informed psychotherapy. They are  
18 likely to suffer from a number of somatic complaints that are often expressions of post-  
19 traumatic symptoms within their culture of origin, including increased pain of unknown  
20 physical origin, headaches, and gastrointestinal distress. Because prolonged stress leads to  
21 systemic physical inflammation, these parents are also at higher risk over the lifespan to  
22 develop cardiovascular disease, cancer, and auto-immune diseases, given that systemic  
23 inflammation has been implicated in all of these disorders. The health and mental health  
24 burdens imposed by this forced separation on an already vulnerable population of parents  
25 will be large and long-lasting.  
26

1                   **D. Effects of Family Separation on Others**

2                   33.       This Family Separation policy is also causing, and will continue to cause,  
3 harm to the emotional well-being of current legal residents and citizens of Washington State.  
4 Some people will have their own prior traumas of forced separation from parents re-  
5 activated, leading to a resurgence in symptoms. Populations at risk in this way include  
6 indigenous people sent to government schools, survivors of the Holocaust who were  
7 separated from their parents, and many former foster children. These individuals' mental  
8 health is being placed at risk by the policy of forced separation of children and parents at the  
9 U.S. border. Their physical well-being is also likely to be adversely affected, as the medical  
10 consequences of psychosocial stress and trauma will likely be increased for them.

11                  34.       This policy is also likely to be frightening to other immigrants and refugees  
12 currently living in Washington State. This apparent sudden change to how the United States  
13 treats families coming to its borders is likely to evoke feelings of insecurity and instability in  
14 them, and create a sense of institutional betrayal. These immigrant and refugee parents may  
15 begin to fear that they, too, may be forcibly separated from their children, particularly if the  
16 parents' legal status is ambiguous in any way. The apparent unpredictability and fast-  
17 changing nature of US policy on this matter undermines faith and trust in the Federal  
18 government, and creates fear, anxiety, and possible reactivation of prior post-traumatic  
19 symptoms.

20                  35.       Finally, these policies affect many other citizens of Washington State who are  
21 not immigrants, refugees, or persons who have experienced forcible parent-child separation.  
22 Most parents can imagine how they might feel were a government to forcibly remove their  
23 child from their care. Children who are exposed to this news are being made aware that their  
24 relationships with their parents may not be entirely secure, and that a government can decide  
25 to pull children away from parents who are good enough. These other citizens of our state  
26

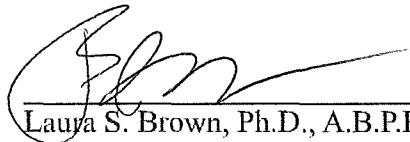
1 and of the U.S. are at risk of emotional harm because they have been made into often-  
2 helpless bystanders to a scenario that frightens and upsets them. Helplessness and feelings of  
3 disempowerment, and governmental actions that reduce trust, undermine people's well-being.

4 **III. Conclusion**

5 36. The Family Separation policy of the Federal government requiring the separation  
6 of certain families who enter the U.S. causes serious and severe harm to the mental health  
7 and well-being of the children and parents who are subjected to it. This policy also causes  
8 harm to current legal residents of the United States, including citizens, legal permanent  
9 residents and immigrants, refugees, and asylum seekers. The costs of being directly or  
10 indirectly subjected to this trauma are likely to be high, not only to the persons directly  
11 affected, but also to the State of Washington and the U.S. society, both now and over time.

12 I declare under penalty of perjury under the laws of the State of Washington and the  
13 United States of America that the foregoing is true and correct.

14 DATED this 19<sup>th</sup> day of June, 2018 at Seattle, Washington.

15  
16  
17   
18 \_\_\_\_\_  
19 Laura S. Brown, Ph.D., A.B.P.P.

1  
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# Exhibit A

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**EDUCATION**

B.A., cum laude, Case Western Reserve University, Cleveland, Ohio. May, 1972. Psychology major.  
M.A., Southern Illinois University, Carbondale, Illinois. May, 1975. Clinical Psychology.  
Ph.D., Southern Illinois University, Carbondale, Illinois. August, 1977. Clinical Psychology.

**HONORARY DEGREE**

Doctor of Humane Letters, Honoris Causa, Massachusetts School of Professional Psychology, 1998.

**PROFESSIONAL AFFILIATIONS**

American Psychological Association: Fellow, 1987. Affiliated with Divisions 9, 12, 29, 35, 42, 43, 44, 45, 46, 56  
Association for Psychological Science: Fellow, 1992  
Washington State Psychological Association  
Association for Women in Psychology  
International Society for Traumatic Stress Studies  
American Board of Professional Psychology  
International Society for the Study of Trauma and Dissociation, Fellow, 2014  
National Academies of Practice

**CURRENT POSITIONS**

Private practice of psychotherapy, consultation and forensic psychology, 1979-present  
Courtesy Clinical Professor, Dept of Psychiatry and Behavioral Sciences, University of Washington, 2015- present

**PROFESSIONAL EDITORSHIPS**

Editorial Board, *Frontiers in the Psychotherapy of Trauma and Dissociation*, 2017-present  
Associate Editor for Clinical Issues, *Journal of Trauma and Dissociation*, 2004-present  
Editorial Board, *Psychological Trauma: Theory, Research, Practice, Policy*, 2009-present  
Editorial Board, *Psychotherapy: Theory, Research, Practice, Training*, 2003-2014.  
Editorial Board, *Psychology, Public Policy and the Law*, 2001-2008.  
Editorial Board, *Journal of Clinical Psychology*, 2002-2016.  
Editorial Board, *Ethics and Behavior*, 1995-present.  
Consulting Editor, *Journal of Traumatic Stress*, 1990-1996  
Editor, *Sage Series on Counseling Women*, 1994-1998  
Editorial Board, *Cultural Diversity and Ethnic Minority Psychology*, 1994-2003  
Book Review Editor and Editorial Board Member, *Women and Therapy*, 1989-1994  
Consulting Editor, *Professional Psychology*, 1987-1994. Editorial reviewer, 1995-present  
Consulting editor, *Psychology of Women Quarterly*, 1980-1988. Editorial reviewer, 1988-present  
Editorial Board, *Counseling and Values*, 1983-1987.  
Consulting Editor, *Journal of Lesbian and Gay Psychotherapy*, 1987-1991.  
Guest reviewer, *Violence and Victims*, *Sex Roles*, *Psychological Reports*, *Journal of Interpersonal Violence*, *American Psychologist*, *Feminism and Psychology*.

## **PAST POSITIONS**

Director and Founder, Fremont Community Therapy Project, 2006-2015  
Clinical Assistant Professor, Smith College School for Social Work, 2011-12  
Adjunct Professor of Clinical Psychology, Washington School of Professional Psychology, 2006-2009  
Professor of psychology, Washington School of Professional Psychology, 2001-2006  
Consulting Psychologist, *Survivor II: The Australian Outback*, 2000.  
Clinical Professor of psychology, University of Washington, Seattle, WA, 1980-1997  
Host, Dr. Laura Brown Show, KVI Radio, Seattle, WA 1981-1982  
Acting assistant professor of psychology, University of Washington, Seattle, WA, 1978-1980  
Assistant professor of psychology, Southern Illinois University at Carbondale, 1977-1978.  
Psychology Intern, Veteran's Administration Medical Center, Seattle, WA 1976- 1977.  
Teaching and research assistant, Dept. of Psychology, Southern Illinois University at Carbondale, 1973-1976.

## **HONORS**

- USPHS Predoctoral Fellow, 1973-1976
- Fellow, American Psychological Association, Divisions 9, 12, 29, 35, 42, 43, 44, 45, 56
- Fellow, Association for Psychological Science
- Fellow, Western Psychological Association
- Fellow, International Society for the Study of Trauma and Dis sociation
- Distinguished Publication Award, Association for Women in Psychology, 1987, 1995.
- Distinguished Contributions Award, American Psychological Association Committee on Lesbian and Gay Concerns, 1989.
- Distinguished Psychologist Award, Washington State Psychological Association, 1989
- Distinguished Professional Contributions Award, APA Division 44, 1990
- Leadership Citation, American Psychological Association Committee on Women in Psychology, 1990
- Invited Participant, American Psychological Association Second Century Assembly
- Cleveland Heights-University Heights High School Alumni Hall of Fame, 1995.
- American Psychological Association Award for Distinguished Professional Contributions to Public Service, 1995.
- International Society for Traumatic Stress Studies Sarah Haley Memorial Award for Clinical Excellence, 1997
- Distinguished Practitioner, National Academy of Pracice in Psychology, Elected 1998
- Heritage Award for Practice, Division of Psychology of Women of the APA, 1998
- Visiting Fellow, British Psychological Society, 2001
- Raymond Fowler Award for Promotion of Student Professional Development, American Psychological Association of Graduate Students, 2003
- Distinguished Contributions Award, Society for the Psychology of Women Section on Lesbian and Bisexual Women's Issues, 2004
- Carolyn Wood Sherif Memorial Award, Society for the Psychology of Women, 2004.
- Psychotherapy With Women Award, Society for the Psychology of Women, 2008.
- Lifetime Award for Distinguished Contributions to Diversity in Practice, Society for Clinical Psychology, 2009.
- Distinguished Psychologist Award, Washington State Psychological Association, 2009
- Presidential Citation, American Psychological Association, 2011
- Outstanding Mentor Award, Division of Psychologists in Independent Practice, 2012
- Elizabeth Hurlock Beckman Award, 2012
- Award for Distinguished Contributions to Teaching and Mentoring, APA Division of Psychotherapy, 2013
- Carolyn Attneave Diversity Award, Society for Family Psychology, 2013
- Washington State Psychological Association Social Issues Award, 2014.
- Lifetime Achievement Award, Division of Trauma Psychology of the APA, 2015.
- Society for Counseling Psychology Section for the Advancement of Women Foremother of the Year, 2018.

## **PUBLICATIONS: Books**

Brown, L.S. (2018). *Feminist therapy (2<sup>nd</sup> Edition)*. Washington DC: American Psychological Association.

- Brown, L.S. (2016). *Not the price of admission: Healthy relationships after childhood trauma*. Seattle WA: Createspace.
- Brown, L. S. (2016). *Essentials of the feminist psychotherapy model of psychotherapy supervision*. Washington DC: American Psychological Association.
- Brown, L.S. (2012) *Your turn for care: Surviving the aging and death of the adults who harmed you*. Seattle WA: Createspace.
- Brown, L.S. (2009). *Feminist therapy*. Washington DC: American Psychological Association.
- Brown, L.S. (2008) *Cultural competence in trauma therapy: Beyond the flashback*. Washington DC: American Psychological Association.
- Quina, K. & Brown, L.S (Eds.) (2007). *Trauma and dissociation in convicted offenders: Issues of gender, science, and treatment*. New York: The Haworth Press.
- Brown, L.S. (Ed.) (2006). *Relational perspectives on trauma treatment*. New York: The Haworth Press.
- Ballou, M & Brown, L.S. (Eds.) (2002). *Rethinking Mental Health and Disorder: Feminist Perspectives*, New York: Guilford.
- Pope.,K.S. & Brown, L.S. (1996). *Recovered memories of abuse: Assessment, therapy, forensics*, Washington DC: American Psychological Association
- Brown, L.S. (1994). *Subversive dialogues: Theory in feminist therapy*. New York: Basic Books.
- Brown, L.S. and Ballou, M. (Eds) (1992). *Personality and psychopathology: Feminist reappraisals*. New York: Guilford Publications.
- Brown, L.S. and Root, M.P.P. (Eds.) (1990). *Diversity and complexity in feminist therapy*, New York: The Haworth Press.
- Brown, L.S. and Rothblum, E.D. (Eds) (1989) *Overcoming fat oppression*. New York: The Haworth Press.

## **PUBLICATIONS: GUIDELINES**

American Psychological Association, Guideline Development Panel for the Treatment of PTSD in Adults (2017 February). *Clinical practice guideline for the treatment of Posttraumatic Stress Disorder (PTSD) in adults*. Retrieved from:<http://www.apa.org/about/offices/directorates/guidelines/ptsd.pdf>. Member of Guidelines Panel

## **PUBLICATIONS: Articles and Chapters in Professional Journals or Books**

- Brown, L. S. (in press). Root, Maria Primitiva Paz. In B. J. Carducci (Editor-in-Chief) & J. S. Mio & R. E. Riggio (Vol. Eds.), *The Wiley-Blackwell encyclopedia of personality and individual differences: Vol. IV. Clinical, applied, and cross-cultural research*. Hoboken, NJ: John Wiley & Sons.
- Ellis, A., Simiola, V., Brown, L.S., Courtois, C.A. & Cook, J. M. (2018). Effect of evidence-based treatment relationships on treatment outcome for adults with trauma: A systematic review. *Journal of Trauma and Dissociation*, 19, pp. 185-213.
- Brown, L.S. (2017). Feminist therapy. In K. Nadal (Ed.). *The SAGE encyclopedia of psychology and gender* (pp. 565-569). Thousand Oaks CA: SAGE Publications.

- Brown, L. S. (2017). Feminist and multicultural perspectives in trauma psychology. In S. Gold, C. Dalenberg & J. Cook (Eds). *APA handbook of trauma psychology* (pp. 501-526). Washington DC: American Psychological Association.
- Comas-Diaz, L. & Brown, L.S. (2016). Multicultural theories. In J. Norcross (Ed). *APA handbook of clinical psychology* (pp. 241-273). Washington DC: American Psychological Association.
- Brown, L.S. (2014). First do no harm: Is it any longer safe to write case reports? *Journal of Interpersonal Violence*, 29, 1-7.
- Brown, L.S. (2014). Looking outside the (voice) box. *Journal of Lesbian Studies*, 18, 43-49.
- Brown, L.S. (2013). Feminist therapy process. In G. Vandenbos, E. Meidenbauer & J. Frank-McNeil (Eds). *Psychotherapy theories and techniques: A reader* (pp. 181-186). Washington DC: American Psychological Association.
- Brown, L.S. (2013). Feminist therapy. In G. Vandenbos, E. Meidenbauer & J. Frank-McNeil (Eds). *Psychotherapy theories and techniques: A reader* (pp. 173-180). Washington DC: American Psychological Association.
- Brown, L.S.(2013). Treating women in psychotherapy. In G. Koocher, J.C. Norcross, and B. Greene (Eds). *Psychologists' Desk Reference (Third Ed)*.(pp. 229-233). New York NY: Oxford University Press.
- Brown, L.S.(2013). Treating the effects of psychological trauma. In G. Koocher, J.C. Norcross, and B. Greene (Eds). *Psychologists' Desk Reference (Third Ed)*.(pp. 289-293). New York NY: Oxford University Press.
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- Brown, L. S. (2012). Compassion amidst oppression: Increasing cultural competence for managing difficult dialogues in therapy. In M. Goldfried, A. Wolf & J.C. Muran (Eds). *Transforming negative reactions to clients: From frustration to compassion* (pp. 139-158). Washington DC: American Psychological Association.
- Brown, L.S. (2012). Feminist therapy as a path to friendship with women. In L. Comas-Diaz and M. Bakur Weiner (Eds). *Women psychotherapists: Journeys in healing*. (pp). New York NY: Jason Aaronson.
- DePrince, A.P, Brown, L.S., Cheit, R.E., Freyd, J.J., Gold, S.N., Pezdek, K. & Quina, K. (2012). Motivated forgetting and misremembering: Perspectives from Betrayal Trauma Theory. In Belli, R. F. (Ed.), *True and False Recovered Memories: Toward a Reconciliation of the Debate (Nebraska Symposium on Motivation 58)* (pp 193-243). New York: Springer.
- Brown, L.S. (2011). A look back at "New Voices, New Visions:" The view from here. *Psychology of Women Quarterly*, 35, 671-75.
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- Brown, L.S. (2004). Memories of childhood abuse: Recovered, discovered, and otherwise. In B.J. Cling (Ed). *Sexualized violence against women and children: A psychology and law perspective* (pp. 188-212). New York: Guilford.
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- Brown, L.S. (2003). Sexuality, Lies, and Loss: Lesbian, Gay, and Bisexual Perspectives on Trauma. *Journal of Trauma Practice*, 2, pp. 55-68.
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- Brown, L.S. (2000). Feminist therapy. In C.R. Snyder and R. Ingram (Eds). *Handbook of psychological change: Psychotherapy process and practices for the 21st Century*. New York: Wiley and Sons.
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- Brown, L.S. (1999). Dangerousness, impotence, silence and invisibility: Heterosexism in the construction of women's sexuality. In C. B. Travis & J. W. White (Eds.) *Sexuality, society, and feminism* (pp. 273-298). Washington DC: American Psychological Association.
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- Gold, S.N. & Brown, L.S. (1999). Assessing survivors of sexual abuse. In Adult Survivors of Sexual Abuse. In R.T. Ammerman & M. Hersen, (Eds.). *Assessment of family violence: A clinical and legal sourcebook (2nd Edition)*. (pp. 390-412). New York: Wiley.
- Brown, L.S. (1999). Reclaiming the sacred in psychotherapy. *Voices: The art and science of psychotherapy, 35*, 7-18.
- Brown, L.S. (1999). All you need is a little respect: What makes feminist therapy effective. *Psychotherapy Bulletin, 34*, 22-27.
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### **PROFESSIONAL TRAINING VIDEOTAPES**

Brown, L.S. (1994). *Feminist therapy*. American Psychological Association Psychotherapy Videotape Series.

Brown, L. S. (1999) *Feminist couples therapy*. International Association of Marriage and Family Counseling Distinguished Presenter Videotape Series.

Brown, L.S. (2005). *Treating women survivors of trauma and abuse*. American Psychological Association Psychotherapy Videotape Series

Brown, L.S. (2006) *Treating male survivors of trauma and abuse*. American Psychological Association Psychotherapy Videotape Series.

Brown, L.S. (2009). *Feminist therapy over time*. American Psychological Association Psychotherapy Videotape Series.

Brown, L. S. (2011). *Cultural competence in trauma treatment*. American Psychological Association Continuing Education On-Line Video Series.

Brown, L.S. (2016). *The feminist approach to therapy supervision*. American Psychological Association Psychotherapy Supervision Videotape Series.

### **ON-LINE TRAINING COURSES**

Brown, L.S. (2015). *Cultural competence in trauma treatment*. APA On-Line Continuing Education Interactive Classroom Program, <http://apa.bizvision.com/category/interactive-classroom-trauma>.

Brown, L.S. (2015). *Becoming a Trauma-Aware Therapist: Definitions and Assessment*. <http://www.continuingcourses.net>

Brown, L.S. (2015). *Treating Trauma: Basic Skills and Specific Treatments*. <http://www.continuingcourses.net>

### **PROFESSIONAL PRESENTATIONS**

Brown, L.S. (2018, February). *Women trauma and psychotherapy: New insights*. Invited keynote address at the conference, Women's Health and Mental Health, Ben Gurion University of the Negev, Beersheva Israel.

Brown, L.S. (2018, February). *Feminist perspectives on the treatment of trauma*. Invited workshop, at the conference, Women's Health and Mental Health, Ben Gurion University of the Negev, Beersheva Israel.

- Brown, L.S. (2017, October). *Cultural competence in trauma practice*. Professional development workshop presented for the Washington State Society for Clinical Social Work, Seattle WA.
- Brown, L.S. (2017, August). *How can we engender healthy relationships in survivors of complex trauma?* Keynote address, EMDR International Association Conference, Bellevue WA.
- Brown, L.S. (2017, April). Panel member in M.B. Donner, (Chair). *When referral is not an option*. Plenary panel, California Psychological Association Annual Meeting, San Francisco CA.
- Brown, L.S. (2017, April). Feminist therapy supervision. In H. Levenson (Chair), *Supervision Revealed: Master Supervisors of Various Orientations Show/Discuss Their Supervision Session Videos*. Symposium presented at the California Psychological Association Annual Meeting, San Francisco CA.
- Brown, L.S. (2017, April). *Ethical and cultural competence in treating trauma survivors: Beyond diagnostic categories*. Pre-Meeting Institute presented at the California Psychological Association Annual Meeting, San Francisco CA.
- Brown, L.S. (2016, September). *Cultural competence in the 21<sup>st</sup> Century*. Invited Keynote Address, Tennessee Association of Mental Health Organizations Annual Conference, Nashville TN.
- Brown, L. S. (2016, August). How can I care for the person who harmed me? Abuse survivors as filial caregivers. In C. Goodheart (Chair) *Trauma and Caregiving: Complicated Situations and Solutions*. Symposium presented at the Annual Convention of the American Psychological Association, Denver CO.
- Brown, L. S. (2016, August). Belief, patience, connection: Relationship above and beyond evidence in trauma treatment in S. Gold (Chair). *Beyond do no harm: The relationship in trauma treatment*. Symposium presented at the Annual Convention of the American Psychological Association, Denver CO
- Brown, L. S. (2016, August). Participant, in C. Courtois (Chair). *Ethics and self-care: Challenges in treating trauma*. Discussion program presented at the Annual Convention of the American Psychological Association, Denver CO
- Brown, L. S. (2016, August). Participant, *Establishing a Clinical Practice in Trauma Psychology*. Discussion Program presented at the Annual Convention of the American Psychological Association, Denver CO
- Brown, L. S. (2016, August). Participant, in J. Cook (Chair) *A past-presidential panel on getting the word out on trauma*. Panel presented at the Annual Convention of the American Psychological Association, Denver CO
- Brown, L. S. (2016, August). Discussant, in S. Gold (Chair). *Forensic practice with vulnerable populations: The victim-victimizer-victim cycle*. Symposium presented at the Annual Convention of the American Psychological Association, Denver CO.
- Brown, L.S. & Slaughter, S. L (2016, June). What feminist psychotherapy supervision looks like. In H. Levenson & A. G. Inman, Chairs, *Master Supervisors and Their Supervisees Show/Discuss Their APA Supervision Videos*. Invited Pre-conference Workshop, Society for the Exploration of Psychotherapy Integration, Dublin, Ireland.
- Brown, L. S. (2016, April). *Assessing trauma in the forensic context*. Invited address, Division of Independent Practice Forensic Conference, Pasadena, CA.
- Brown, L.S. (2016, March). *Cultural competence in trauma treatment*. Invited Advanced Workshop, New South Wales Service for the Treatment and Rehabilitation of Torture and Trauma Survivors, Sydney NSW Australia.
- Brown, L.S. (2016, March). *Complex childhood trauma and relationships: Helping survivors to stop paying the price of admission*. Invited lecture, Queensland University of Technology, Brisbane, QLS Australia.

- Brown, L.S. (2015, August). Feminist therapy with complex trauma: Accompanying a survivor on her hobbit journey. In B. Greene (Chair). *Frodo and Sam enter Mordor: The feminist therapy alliance in complex trauma*. Symposium presented at the 123<sup>rd</sup> Annual Convention of the American Psychological Association, Toronto Ontario Canada.
- Brown, L.S. (2015, August). Relational and countertransference issues in work with complex trauma. In L. Rocchio (Chair). *Ethical and relational issues in complex trauma treatment in independent practice*. Symposium presented at the 123<sup>rd</sup> Annual Convention of the American Psychological Association, Toronto Ontario Canada.
- Brown, L.S. (2015, August). Discussant. In S. Gold (Chair). *A contextual approach to treating dissociation*. Symposium presented at the 123<sup>rd</sup> Annual Convention of the American Psychological Association, Toronto Ontario Canada.
- Brown, L. S. (2015, January). Therapist self-care as a social justice ethic. In B. Greene (Chair), *No easy answers: Ethics and social justice practice*. Symposium presented at the National Multicultural Conference and Summit, Atlanta GA.
- Brown, L.S. (2014, October). *The therapist as person, the person as therapist: The interweave between the two in my development*. Invited lecture, Annual Meeting of the Seattle Psychotherapy Cooperative, Seattle WA.
- Brown, L.S. (2014, August). Empowerment as an ingredient of effective psychotherapy. In R.K. Goodyear (Chair), *How does psychotherapy work? Looking to theory and evidence to identify change mechanisms*. Symposium presented at the 122<sup>nd</sup> Annual Convention of the American Psychological Association, Washington DC
- Brown, L.S. (2014, August). On not quitting the day job. In M. Hoyt, Chair, *Psychotherapist tales of inspiration, passion and renewal*. Symposium presented at the 122<sup>nd</sup> Annual Convention of the American Psychological Association, Washington DC
- Brown, L.S. (2014, August). What empowerment looks like. In J. Magnavita (Chair), *Psychotherapy revealed: A glimpse of eminent psychotherapists in session*. Symposium presented at the 122<sup>nd</sup> Annual Convention of the American Psychological Association, Washington DC
- Brown, L.S., Gold, S.N, and Rocchio, L. (2014, August). *The basics of forensic trauma practice*. Workshop presented at the 122<sup>nd</sup> Annual Convention of the American Psychological Association, Washington DC.
- Brown, L.S. (2014, April). How to publish: The editor's perspective. In J. Till (Chair). *How to publish*. Symposium presented at the 94<sup>th</sup> Annual Convention of the Western Psychological Association, Portland OR.
- Brown, L.S. (2014, April). *With power tools: Lesbian feminists enter marriage*. 20<sup>th</sup> Annual Andrea Carson Coley Memorial Lecture, Institute for Women's Studies, University of Georgia, Athens GA.
- Brown, L. S. (2014, April). *Developing cultural competence: Intersections of therapists' and clients' lives*. Invited keynote address, Our Alaska Lives Conference, Anchorage AK.
- Brown, L.S. (2014, April). *Their turn for care: Supporting clients dealing with the aging and death of abusive elders*. Invited workshop, Our Alaska Lives Conference, Anchorage AK.
- Brown, L.S. (2013, November). *Their turn for care: Assisting survivors in dealing with the aging and death of family member perpetrators*. Workshop presented at the 20<sup>th</sup> Annual Conference of the International Society for the Study of Trauma and Dissociation, Baltimore, MD.
- Brown, L.S. & Steele, K. (2013, November). *Eek, there's dissociation in my office! Supervision and consultation with therapists new to complex trauma and dissociation* Workshop presented at the 20<sup>th</sup> Annual Conference of the International Society for the Study of Trauma and Dissociation, Baltimore, MD.



- Golston, J., Brown, L.S., Courtois, C.A. & Kinsler, P. (2013, November). *Ethics and trauma, working under pressure: A relational perspective*. Workshop presented at the 20<sup>th</sup> Annual Conference of the International Society for the Study of Trauma and Dissociation, Baltimore, MD
- Brown, L.S. (2013, August). Breathing in power: Bringing the body back in feminist practice. In B. Greene (Chair), *Embodied paths toward the future of feminist psychology*. Symposium presented at the Annual Conference of the American Psychological Association, Honolulu HI.
- Brown, L.S. (2013, August). Feminist therapy: What empowerment looks like. In J. Magnavita, (Chair), *Psychotherapy revealed: A glimpse of eminent psychotherapists at work*. Symposium presented at the Annual Conference of the American Psychological Association, Honolulu HI.
- Brown, L.S. (2013, April). *Cultural competence in trauma therapy: A social justice perspective*. Workshop presented at the West Coast Children's Clinic, Oakland CA.
- Brown, L.S. (2013, April). *Supervisory challenges in trauma work: Boundaries, self-care, and reenactments*. Workshop presented at the West Coast Children's Clinic, Oakland CA.
- Brown, L.S. (2013, February). *Twentyfirst Century cultural competence. Cultural competence in trauma treatment*. Workshop presented at the New School for Social Research, New York NY.
- Brown, L. S. (2013, February). *Cultural competence in trauma treatment*. Workshop presented for the Institute for Contemporary Psychotherapy, New York NY.
- Brown, L.S. (2012, October). *Cultural competence in trauma treatment*. Workshop presented for the Nashville Psychotherapy Institute, Nashville TN.
- Brown, L.S. (2012, October). *Increasing cultural competence through mindful self-awareness*. Workshop presented to the Executive Board of the Division of Psychotherapy of the American Psychological Association, Washington DC.
- Brown, L.S. (2012, September). *Vicarious traumatization and self-care*. In-service workshop conducted for the staff of Western State Hospital, Steilacoom WA.
- Brown, L.S. (2012, August). Becoming a culturally competent trauma therapist. In J. Cook (Chair). *Working with adult trauma survivors: What every practitioner should know*. Continuing Education Workshop presented at the 120<sup>th</sup> Annual Convention of the American Psychological Association, Orlando FL.
- Brown, L.S. (2012, August). Becoming a culturally competent trauma therapist. In J. Cook (Chair). *Working with adult trauma survivors: What every practitioner should know*. Continuing Education Workshop presented at the 120<sup>th</sup> Annual Convention of the American Psychological Association, Orlando FL.
- Brown, L.S. (2012, August). Discussant in C. Dalenberg (Chair). *Ethics of case studies*, Symposium presented at the 120<sup>th</sup> Annual Convention of the American Psychological Association, Orlando FL.
- Brown, L.S. (2012, August). We're all women or we're not: Gender and cultural competence. In L. Comas-Diaz (Chair), *Cultural competence in independent practice*, Symposium presented at the 120<sup>th</sup> Annual Convention of the American Psychological Association, Orlando FL.
- Brown, L.S. (2012, August). Feminist supervision: Empowerment all around. In C.E. Watkins (Chair). *Seasoned psychotherapy supervisors' visions of supervision: Abiding practice convictions*. Symposium presented at the 120<sup>th</sup> Annual Convention of the American Psychological Association, Orlando FL.
- Brown, L.S. (2012, July). *Cultural competence in trauma treatment: Self-care for the therapist*. Workshop presented by the Fremont Community Therapy Project, Seattle WA.

- Brown, L.S. (2012, June). *Cultural competence in trauma*. Trauma Talks Conference, Toronto Ontario Canada.
- Brown, L.S. (2012, May). *Cultural competence as the integrating variable: Training the next generation of therapists*. Invited keynote address, Society for the Exploration of Psychotherapy Integration, Evanston IL.
- Brown, L.S. (2012, February). *Ethical and cultural competence in work with trauma survivors*. Invited continuing education workshop, Washington State University, Pullman WA.
- Brown, L. S. (2012, April). *Swimming in murky ethical waters: Self-care and social justices as guides to safer shores*. Invited continuing education workshop, Georgia Society for Clinical Social Work, Atlanta GA.
- Brown, L.S. (2012, February). *Ethical and cultural competence in work with trauma survivors*. Invited continuing education workshop, University of North Texas/Texas Women's University, Denton TX.
- Brown, L. S. (2011, September). *Feminist perspectives on work with trauma survivors*. Invited Continuing Education Workshop presented at the Mariposa Center, Orange CA.
- Brown, L.S. (2011, August). *Trauma and myths of masculinities*. Invited keynote address, Society for the Psychological Study of Men and Masculinity, 119<sup>th</sup> Conference of the American Psychological Association, Washington DC.
- Brown, L. S. (2011, August). You will so be empowered: Feminist therapy with a reluctant participant. In J. Magnativa (Chair). *Eminent psychotherapists revealed: Audiovisual presentation of principles of psychotherapy*. Symposium presented at the 119<sup>th</sup> Conference of the American Psychological Association, Washington DC.
- Brown, L. S. (2011, August). Teaching and supervising feminist therapy in the 21<sup>st</sup> Century. In C. Watkins (Chair), *Teaching and supervising psychotherapies in the 21<sup>st</sup> Century: Pressing needs, impressing possibilities*. Symposium presented at the 119<sup>th</sup> Conference of the American Psychological Association, Washington DC.
- Brown, L.S. (2011, August). *Forensic trauma practice*. Continuing Education Workshop sponsored by the Division of Trauma Psychology, 119<sup>th</sup> Conference of the American Psychological Association, Washington DC.
- Brown, L.S. (2011, August). *Cultural competence in trauma practice*. Continuing Education Workshop sponsored by the Division of Trauma Psychology, 119<sup>th</sup> Conference of the American Psychological Association, Washington DC.
- Brown, L.S. (2011, June). *Feminist perspectives on trauma treatment*. Invited workshop, Adler Graduate School of Professional Psychology, Chicago IL.
- Brown, L.S. (2011, January). Speaker, *A minyan of women*, Discussion program presented at the Sixth National Multicultural Conference and Summit of the APA, Seattle WA.
- Brown, L.S. (2011, January). Panel member and discussant, *Is multicultural psychology ascientific?* Program presented at the Sixth National Multicultural Conference and Summit of the APA, Seattle WA.
- Brown, L.S. (2010, August). *Can we create social justice: Toward an ethic of justice for trauma psychology*. Division of Trauma Psychology Presidential Address, presented at the 118<sup>th</sup> Annual Convention of the American Psychological Association, San Diego CA.
- Brown, L.S. (2010, May). *Establishing and rebutting emotional distress damage claims: The forensic mental health expert's perspective*. Invited speaker, 43<sup>rd</sup> Annual Pacific Coast Labor and Employment Law Conference, Seattle WA.
- Brown, L.S. (2010, April). *Real men don't get terrified: Working with male survivors of trauma*. Invited keynote address at a conference, Counseling Men in Difficult Times. California State University, Fullerton CA.

- Brown, L.S. (2010, February). The Fremont Community Therapy Project: Creating our feminist vision. In L.S. Brown (Chair) *Creating a feminist therapy community training clinic*. Symposium presented at the Annual Conference of the Association for Women in Psychology, Portland OR.
- Brown, L.S. (2010, February). Preventing vicarious traumatization through supervision. In E. Zurbriggen (Chair). *Vicarious traumatization in the clinic, classroom, and laboratory: Caring for ourselves and each other*. Symposium presented at the Annual Conference of the Association for Women in Psychology, Portland OR.
- Brown, L.S. (2009, August). Re-centering margins and marginalizing centers. In B. Greene (Chair). *From margins to center---Feminist psychology discourse and social justice in the Sheriff tradition*. Symposium presented at the 117<sup>th</sup> Annual Convention of the American Psychological Association, Toronto Ontario.
- Brown, L.S. (2009, August). Assessment and climbing on rocks: Psychologist meets reality TV. In S. Ladani (Chair). *Vive la difference: Lessons from psychologists in unusual careers*. Symposium presented at the 117<sup>th</sup> Annual Convention of the American Psychological Association, Toronto Ontario.
- Brown, L.S. (2009, May). *Cultural Competence: A New Way of Thinking about Integration in Therapy*. Invited Keynote Address, Society for the Exploration of Psychology Integration Annual Meeting, Seattle WA.
- Brown, L.S. (2009, May). *Cultural competence for the 21<sup>st</sup> Century*. Invited Workshop, Society for the Exploration of Psychology Integration Annual Meeting, Seattle WA.
- Brown, L.S. (2009, May). *Transferential and countertransferential issues in work with lesbian and bisexual women clients*. Invited Workshop, Center for Women's Health Promotion, Ben Gurion University, Beer Sheva Israel.
- Brown, L.S. (2009, May). *New approaches to working with women and trauma*. Invited Address, , Center for Women's Health Promotion, Ben Gurion University, Beer Sheva Israel.
- Brown, L.S. (2009, May). *Feminist therapy theory*. Invited Workshop, Center for Women's Health Promotion, Ben Gurion University, Beer Sheva Israel.
- Brown, L.S. (2009, May). *Feminist psychotherapy supervision*. Invited Workshop, Center for Women's Health Promotion, Ben Gurion University, Beer Sheva Israel
- Brown, L.S. (2009, April). Panelist in discussion program, *The Great ethics debate: How many "right" solutions can there be?* Convention of the California Psychological Association, Oakland CA.
- Brown, L.S. (2008, October). *Enhancing cultural competence in psychotherapy*. Invited workshop, Pacific University Graduate School of Professional Psychology, Hillsboro OR.
- Brown, L.S. (2008, October). *Cultural competence in trauma therapy: Getting beyond the flashback*. Invited workshop, Womenscare Counseling Center, Evanston IL.
- Brown, L.S. (2007, November). Betrayal trauma and the ethics of diagnosis. In J. Freyd (Chair), *Betrayal trauma: The ethics of diagnosis and treatment*. Symposium presented at the Annual Meeting, International Society for Traumatic Stress Studies, Baltimore MD.
- Brown, L. S. (2007, November). *Cultural competence in response to multiple identities in the context of trauma*. Pre-Meeting Institute presented at the Annual Meeting, International Society for Traumatic Stress Studies, Baltimore MD.
- Brown, L.S. (2007, October). *Developing cultural competence for the 21<sup>st</sup> Century*. Workshop presented for the Diversity Interest Group, Center for the Study of Women in Society, University of Oregon, Eugene OR.
- Brown, L.S. (2007, October). *Treating Bajorans: Epistemologies of cultural competence in trauma treatment*. Invited colloquium lecture, Dept. of Psychology University of Oregon, Eugene OR.

- Brown, L.S. (2007, August). Finding my center: Martial arts on the way to Tikkun Olam. In J.C. Norcross (Chair) *Psychotherapist self-care: Leaving it at the office*. Symposium presented at the 115<sup>th</sup> Annual Convention of the American Psychological Association, San Francisco CA.
- Brown, L. S. (2007, August). Re-centering at the margin: Creating a continuously multicultural feminist therapy. In E. N Williams (Chair). *International perspectives on feminist multicultural psychotherapy: Content and connection*. Symposium presented at the 115<sup>th</sup> Annual Convention of the American Psychological Association, San Francisco CA.
- Brown, L.S. (2007, August). Discussant. In S. Gold, Chair, *Prostitution, trafficking, sexual compulsivity, and trauma*. Symposium presented at the 115<sup>th</sup> Annual Convention of the American Psychological Association, San Francisco CA.
- Ford, L.N., Brown, L.S., Kerr, D. M, and Schwartz, L. (2007, August). *Qualitative study of previously infertile mothers and their experiences*. Poster presented at the 115<sup>th</sup> Annual Convention of the American Psychological Association, San Francisco CA.
- Brown, L.S. (2007, March). *Feminist therapy paradigms for working with complex trauma*. Workshop presented at the Annual Conference of the Association for Women in Psychology, San Francisco CA.
- Brown, L.S. (2006, December). *More Than A Flashback: Existential and Multicultural Issues in Trauma Treatment*. Invited Keynote Address, Annual Conference of the British Columbia Association of Specialized Victim Assistance and Counseling Programs. Vancouver BC Canada.
- Brown, L.S. (2006, December). *Which self am I for: Intersecting identities in feminist trauma practice*. Invited workshop Annual Conference of the British Columbia Association of Specialized Victim Assistance and Counseling Programs. Vancouver BC Canada
- Brown, L.S. (2006, November). *Culturally competent trauma practice*. Invited workshop, Convention of the Minnesota Counseling Association, St. Cloud MN.
- Brown, L.S. (2006, November). *Is it a girl? The importance of gender in psychotherapy*. Keynote workshop, Convention of the Minnesota Counseling Association, St. Cloud MN.
- Brown, L.S. (2006, August). *Swimming as a feminist*. Invited presentation, 114<sup>th</sup> Annual Convention of the American Psychological Association, New Orleans LA.
- Brown, L.S. (2006, June). *Feminist therapy in the context of multiple and conflicting identities*. Invited address, Section on Psychology and Women, Conference of the Canadian Psychological Association, Calgary, Alberta.
- Brown, L.S. (2006, May). *Feminist therapy with difficult and challenging clients*. Invited workshop presented for the Chinese Guidance and Counseling Association, Taipei, Taiwan.
- Brown, L.S. (2006, May). *Working with trauma survivors*. Invited workshop presented at the National Dongwa University, Dongwa, Taiwan.
- Brown, L.S. (2006, May). *Feminist therapy perspectives on trauma treatment*. Invited workshop presented at the National Changua University of Education, Changua Taiwan.
- Brown, L.S. (2006, May). *Working with lesbian, gay and bisexual clients*. Invited workshop presented at the National Changua University of Education, Changua Taiwan.
- Brown, L.S. (2006, March). *If I'm not for myself-but which self? Living in multiple identities*. Invited keynote address, Annual Conference of the Association for Women in Psychology, Ann Arbor MI.

- Brown, L.S. (2005, August). *Still subversive after all these years*. Carolyn Wood Sherif Memorial Award Invited Address, 113<sup>th</sup> Annual Convention of the American Psychological Association, Washington DC.
- Brown, L.S. & Garnets, L. (2005, August). *So these two Jewish lesbians walk into an AWP conference*. Section on Lesbian Issues Invited Address, 113<sup>th</sup> Annual Convention of the American Psychological Association, Washington DC.
- Brown, L.S. (2005, August). Discussant. In L.S. Brown, Chair, *Ethical and pedagogical issues in assigned student self-disclosures*. Symposium presented at the 113<sup>th</sup> Annual Convention of the American Psychological Association, Washington DC.
- Brown, L.S., Antuna, C. & Underwood, B. (2004, November). *Infusing multicultural competence into trauma work*. Workshop presented at the Annual Conference of the International Society for Traumatic Stress Studies, New Orleans LA.
- Brown, L.S. (2004, November). Contextual issues in the assessment of complex trauma. In S. Gold (Chair), *Contextual issues in complex trauma: Assessment and treatment*. Symposium presented at the Annual Conference of the International Society for Traumatic Stress Studies, New Orleans LA.
- Brown, L.S. (2004, August). Teaching about trauma in the professional school setting. In L.S. Brown, (Chair) *Telling the truth about trauma in psychology training*. Symposium presented at the 112<sup>th</sup> Annual Convention of the American Psychological Association, Honolulu Hawai'i.
- Brown, L.S. (2004, August). Discussant. In B. Greene (Chair). *A minyan of women*. Symposium presented at the 112<sup>th</sup> Annual Convention of the American Psychological Association, Honolulu Hawai'i
- Brown, L.S. (2004, May). *Diversity and Clinical Psychology*. Colloquium presented at the Dept. of Psychology, University of Oregon, Eugene OR.
- Brown, L.S. (2004, May). *Self-care and the therapist*. Lecture presented at the Dept. of Psychology, University of Oregon, Eugene OR.
- Brown, L.S. (2004, April). *Trauma memory and treatment: Therapy in a minefield*. Workshop presented at Kansas Wesleyan University, Salina KS.
- Brown, L.S. (2004, March). *Feminist contributions to women's mental health*. Plenary Address presented at the Second International Congress on Women's Mental Health, Washington DC.
- Brown, L.S. (2003, October). True trauma or true drama: Forensic trauma assessment and the challenge of malingering. In L.S. Brown (Chair), *Trauma assessment: Challenges and contexts*. Symposium presented at the 19<sup>th</sup> Annual Meeting of the International Society for Traumatic Stress Studies, Chicago IL.
- Courtois, C.A., Turkus, J. & Brown, L.S. (2003, October). *Risk management in trauma treatment*. Workshop presented at the 19<sup>th</sup> Annual Meeting of the International Society for Traumatic Stress Studies, Chicago IL.
- Brown, L. S. (2003, August). "And my people shall be your people: A Jewish alliance journey." In J. Mio (Chair). *Diversity in allied behavior: From the general to the specific*, Symposium presented at the 111<sup>th</sup> Convention of the American Psychological Association, Toronto Ontario Canada.
- Brown, L. S. (2003, August). When feminist and mainstream ethics collide. In L. Knauss, (Chair). *Feminist Ethics-Practice and Perspective*. Symposium presented at the 111<sup>th</sup> Convention of the American Psychological Association, Toronto Ontario Canada.
- Brown, L. S. (2003, August). From practice to classroom: Creating the next generation. In L. S. Brown and D. Haldeman (Chairs). *Privately out of the closet: Lives and work of LGB therapists*. Symposium presented at the 111<sup>th</sup> Convention of the American Psychological Association, Toronto Ontario Canada.

- Brown, L. S. (2003, August). Advances in practice. In E. Cole, (Chair). *Thirty years of passion and progress- APA Committee on Women in Psychology.* Symposium presented at the 111<sup>th</sup> Convention of the American Psychological Association, Toronto Ontario Canada.
- Brown, L.S. (2003, May). *Deconstructing diagnosis: Thinking beyond the DSM.* Invited keynote workshop, Annual Convention of the Oregon Psychological Association, Eugene OR.
- Brown, L.S. (2003, May). *Diversity: Yours, mine and ours.* Workshop presented at the Annual Convention of the Oregon Psychological Association, Eugene OR.
- Brown, L.S. (2003, February). *Deconstructing diagnosis: How to think diagnostically.* Workshop presented for the Portland Chapter, Association for Women in Psychology, Portland OR.
- Brown, L.S. (2003, January). Panel member in S. Dworkin (Chair). *From Moshe Rabenu to Go Down Moses: A Jewish-African American dialogue.* Third National Multicultural Conference and Summit, Los Angeles CA.
- Brown, L.S. (2002, November). Forensic assessment of complex post-traumatic states in civil litigation. In L.S. Brown (Chair). *Contextual issues in complex trauma.* Symposium presented at the Eighteenth Annual Meeting, International Society for Traumatic Stress Studies, Baltimore MD.
- Brown, L.S. (2002, August). *Can trauma be queer too? LGB issues in the study of trauma, loss, and grief.* Invited lecture presented at the 110<sup>th</sup> Annual Convention of the American Psychological Association, Chicago IL.
- Brown, L.,S. (2002, August) My “family” in psychology”: The people who have taught me. In M. Hoyt (Chair) *Honoring our teachers: Eminent psychologists describe who influenced them and how.* Symposium presented at the 110<sup>th</sup> Annual Convention of the American Psychological Association, Chicago IL.
- Brown, L.S. (2002, August). “Don’t be a sheep”: How this oldest daughter became a feminist therapist. In J. Norcross, (Chair). *Why I (really) became a psychotherapist: Five psychologists speak.* Symposium presented at the 110<sup>th</sup> Annual Convention of the American Psychological Association, Chicago IL.
- Brown, L.S. (2001, August). How I embody feminist therapy. In J. Norcross (Chair) *How do eminent therapist embody their theory of psychotherapy.* Symposium presented at the 109<sup>th</sup> Convention of the American Psychological Association, San Francisco CA.
- Brown, L.S. (2001, August). Will the “Real” Mother Please Stand Up?: Implications of the Troxel Decision for Lesbian and Gay Families. In M. Gottlieb (Chair). *Implications of the US Supreme Court Troxel Decision.* Symposium presented at the 109<sup>th</sup> Convention of the American Psychological Association, San Francisco CA.
- Brown, L.S. (2001, March). *Increasing competency in psychotherapy with lesbian, gay and bisexual clients.* Workshop presented at Birkbeck College, University of London, London England.
- Brown, L.S. (2001, March). A century of psychotherapy with lesbian, gay and bisexual clients: Always patients? In S. Wilkinson, (Chair), *A century of lesbian and gay psychology.* Symposium presented at the Centenary Meeting of the British Psychological Society, Glasgow, Scotland.
- Brown, L.S. (2001, March). *Lesbian and gay paradigm in psychology: Notes for the second stage.* Invited Address presented at the Centenary Meeting of the British Psychological Society, Glasgow, Scotland.
- Brown, L.S. (2001, March). From subversive dialogues to difficult ones: Feminist therapy with highly challenging clients. In L. Moss (Chair), *Advanced Feminist Therapy Institute,* Workshop presented at the Annual Conference of the Association for Women in Psychology, Los Angeles CA.
- Brown, L.S. (2001, January). *Ethical and professional issues in managing overlapping relationships.* Workshop presented for the Oregon State University Counseling Center, Corvallis OR.

- Brown, L.S. (2000, August) Feelings in context: Feminist therapy perspectives on countertransference. In J. Norcross, (Chair) *Six perspectives on countertransference*, Symposium presented at the 108<sup>th</sup> Convention of the American Psychological Association, Washington DC.
- Brown, L.S. (2000, May). *Basic concepts in feminist therapy theory*. Workshop presented for the University of Florida Counseling Center, Gainesville FL.
- Brown, L.S. (2000, May). *Surviving and Thriving in Trauma Work in the 21<sup>st</sup> Century*. Keynote address to the Gainesville Commission on the Status of Women Annual Conference on Sexual Assault, Gainesville FL.
- Brown, L.S. (2000, May). *From subversive dialogues to difficult ones: Challenges in feminist therapy practice*. Workshop presented for the Portland Women's Therapy Project, Portland, OR.
- Brown, L.S. (2000, March). *Welcome to the Gamma quadrant: Forensic survival strategies for trauma therapists*. Workshop presented for the Women's and Children's Center, Boise ID.
- Brown, L.S. (2000, January). *Trauma, memory, and treatment*. Workshop presented for Eastern Washington University Continuing Professional Education Program, Spokane WA.
- Frankel, S., Brown, L.S. & Dalenberg, C. (1999, November). *Forensic assessment of Dissociative Identity Disorder*. Workshop presented at the 15th Annual Meeting of the International Society for Traumatic Stress Studies, Miami FL.
- Brown, L.S. (1999, November). *Finding hope: Surviving as a trauma therapist*. Keynote address and workshop presented at the Ninth Annual Conference of the Renfrew Center Foundation, Philadelphia PA.
- Brown, L.S. (1999, October). *Trauma, memory, and feminist perspectives on trauma treatment*. Workshop presented for Joining Together Against Sexual Abuse, Cleveland OH.
- Brown, L.S. (1999, October). *Forensic concerns for treating therapists*. Workshop presented at the Midwest Conference on Child Sexual Abuse, Madison WI.
- Brown, L.S. (1999, October). *Trauma, memory and treatment*. Workshop presented at the Midwest Conference on Child Sexual Abuse, Madison WI.
- Brown, L.S. (1999, October). Psychological expert testimony in white collar crime cases. In M. Pasano (Chair), *White collar crime*, Symposium presented at the APA-ABA Conference on Psychological Expertise and the Criminal Justice System, Arlington VA.
- Brown, L.S. (1999, August). Coping with "retractor" lawsuits: How to reduce risk. Presented at a symposium, *Therapist misconduct in the next millenium: Trends, legal costs and risk management*. (R. Folman, Chair). 107th Annual Convention of the American Psychological Association, Boston MA.
- Brown, L.S. (1999, August). Participant, roundtable discussion, *Feminist therapy experiences and reflections*. (M. Ballou, Chair). 107th Annual Convention of the American Psychological Association, Boston MA.
- Brown, L.S. (1999, August). Forensic issues in recovered memory cases: An update. Presented at a symposium, *Delayed recall of trauma: An update on clinical and forensic practice*. (C. Courtois, Chair). 107th Annual Convention of the American Psychological Association, Boston MA.
- Brown, L.S. (1999, April). *Feminist therapy with a same-sex couple*. Invited Distinguished Presenter, Annual Meeting, International Association of Marriage and Family Counselors, San Diego CA.
- Brown, L.S. (1999, April). *Forensic issues for trauma therapists*. Invited workshop at a conference, Posttraumatic Stress Disorders Treatment in the Post DSM IV World. US Dept. of Veteran's Affairs, Seattle WA.

- Brown, L.S. (1998, November). *Adventures in the Gamma Quadrant: Surviving as a trauma specialist in the age of "false memory" litigation*. Plenary lecture presented to the Annual Meeting of the International Society for the Study of Dissociation, Seattle WA.
- Brown, L.S. (1998, November). *Forensic concerns for treating therapists*. Workshop presented at the Annual Meeting of the International Society for the Study of Dissociation, Seattle WA.
- Brown, L.S. (1998, October). *Reclaiming the sacred in psychotherapy practice: The challenge of the new millenium*. Keynote Address at the Annual Institute and Conference, American Academy of Psychotherapists, Austin, TX.
- Brown, L.S. (1998, October). *Feminist therapy: Not for women only*. Workshop presented at the Annual Institute and Conference, American Academy of Psychotherapists, Austin, TX.
- Brown, L.S. (1998, September). *Trauma and memory: Cognitive and neuroscience findings as applied to EMDR practice*. Pacific NW EMDR Conference, Seattle WA.
- Brown, L.S. (1998, August). *The recovered memory debate: Where do we stand now?* Invited address, Brief Therapy Conference of the Milton Erickson Foundation, New York NY.
- Brown, L.S. (1998, August). *When your client is a plaintiff: Forensic survival strategies for treating therapists*. Workshop presented at the Brief Therapy Conference of the Milton Erickson Foundation, New York NY.
- Brown, L.S. (1998, August). Forensic assessment issues in delayed recall cases. In C. Courtois (Chair), *Issues in recovered memory: What's the state of the art*, Symposium presented at the 106th Annual Convention of the American Psychological Association, San Francisco CA.
- Brown, L. S. (1998, August). All you need is a little respect: What makes feminist therapy effective. In J. Norcross (Chair). *Three things that make my therapy effective*. Symposium presented at the 106th Annual Convention of the American Psychological Association, San Francisco CA.
- Brown, L. S. (1998, August). *Trauma, memory and treatment: A feminist perspective*. Continuing education workshop presented for the Division of Psychotherapy, 106th Annual Convention of the American Psychological Association, San Francisco CA.
- Brown, L.S. (1998, June). *Making social justice a life focus*. Invited speaker, 1998 Commencement of the Massachusetts School of Professional Psychology, Boston MA.
- Brown, L.S. (1998, April). *False memories or false assumptions: A critical look at the memory debates*. Visiting Scholar Lecture, Kenyon College, Gambier OH.
- Brown, L.S. (1998, April). *Feminist models of ethical decision-making for practice*. Workshop presented for the Interdisciplinary Program in Feminist Practice, University of Michigan, Ann Arbor MI.
- Brown, L.S. (1998, March). Therapists in the courtroom: Probably not, maybe? In W. Foote, chair *An immodest proposal: Therapists should not be allowed in the courtroom*, Syposium presented at the Biennial Meeting, American Psychology-Law Society, Redondo Beach CA.
- Brown, L.S. (1998, February). *Introduction to theory of feminist practice*. Workshop presented at Rollins College, Winter Park FL.
- Brown, L.S. (1998, February). *Ethical dilemmas in feminist forensic practice*. Presented at the Annual Conference, Division of Psychology of Women, Lexington KY.



- Brown, L.S., (1998, January). *Towards subverting despair: Finding the sacred in psychotherapy practice*. Keynote address presented at the Mid-Winter Meeting of the Georgia Psychological Association, Division E, Young Harris GA.
- Brown, L.S. (1998, January). *Who me, spiritual? Recreating meaning in psychotherapy*. Workshop presented at the Mid-Winter Meeting of the Georgia Psychological Association, Division E, Young Harris GA
- Brown, L.S. (1997, November). *Overcoming fear of politics: How embracing diversity can empower you as a therapist*. Invited keynote address, Women and Power Conference, Arbour Health Systems, Boston MA.
- Brown, L.S. (1997, November). Discussant, in M. A. Dutton, (Chair). *Alternative hypotheses in feminist forensic psychology*. Symposium presented at the 13th Annual Meeting of the International Society for Traumatic Stress Studies, Montreal Quebec.
- Brown, L.S. (1997, November). Special topics in forensic assessment of trauma: Gender, race, class, and culture. In A. Pratt (Chair) *Psychological trauma: Forensic evaluation and testimony*. Invited Workshop presented at the 13th Annual Meeting of the International Society for Traumatic Stress Studies, Montreal Quebec.
- Brown, L.S. & Courtois, C. (1997, November). *Delayed memory in the clinical setting: Treatment principals and guidelines*. Invited Workshop presented at the 13th Annual Meeting of the International Society for Traumatic Stress Studies, Montreal Quebec.
- Brown, L.S. (1997, October). *Trauma, memory and treatment: What's the state of the art*. Workshop presented at the Nova Southeastern University School of Professional Psychology, Ft. Lauderdale FL.
- Brown, L.S. (1997, September). *What do gender and sexuality issues have to do with the practice of clinical psychology?* Workshop presented at the San Diego campus, California School of Professional Psychology, San Diego CA.
- Brown, L.S. (1997, August). Discussant, in G. Koocher, Chair, *Scientific and political issues in the recovered memory debate*. Symposium presented at the 105th Annual Convention of the American Psychological Association, Chicago IL
- Brown, L.S. (1997, August). *Giving away feminist psychology: To whom, and how?* Division 35 Presidential Address presented at the 105th Annual Convention of the American Psychological Association, Chicago IL.
- Brown, L.S. (1997, July). *Forensic considerations for EMDR practitioners*. Invited plenary lecture, Second Annual Conference of the EMDR International Association, San Francisco CA.
- Brown, L.S. (1997, June). *Feminist therapy theory and practice*. Workshop presented at the Justice Institute, Vancouver BC.
- Brown, L.S. (1997, April). *The debate over delayed recall of childhood abuse: What do we know now*. Invited lecture presented at the Annual Meeting of the Western Psychological Association, Seattle WA.
- Brown, L.S. & Haldeman, D. (1997, March). *Lesbian and gay issues in professional psychology*. Workshop presented at the Midwinter Conference of Divisions 29, 42, 43, St. Petersburg FL.
- Brown, L.S. (1997, March). *Introduction to Feminist Therapy theory and practice*. Workshop presented for the Psychological Service Center, Pacific University, Forest Grove OR.
- Brown, L.S. (1997, January). *Ethical and legal concerns for therapists in the recovered memory context*. Lecture presented to the Seattle Counselor Association, Seattle WA.
- Brown, L.S. (1996, December). *Core concepts in feminist therapy theory*. Workshop presented at the Brief Therapy Conference of the Milton Erickson Foundation, San Francisco CA.

- Brown, L.S. (1996, December). *Feminist therapy perspectives on diagnosis*. Workshop presented at the Brief Therapy Conference of the Milton Erickson Foundation, San Francisco CA.
- Brown, L.S. (1996, November). Expert testimony and forensic evaluations. In K.S. Pope (Chair) *Recovered memory controversy: Legal trends, expert testimony and clinical implications*. Symposium presented at the 12th Annual Meeting, International Society for Traumatic Stress Studies, San Francisco CA.
- Brown, L.S. (1996, November). Special considerations in forensic evaluations: Multiple vulnerabilities. In M.A. Dutton, (Chair), *Sexual harassment as trauma: The controversy in a forensic context*. Symposium presented at the 12th Annual Meeting, International Society for Traumatic Stress Studies, San Francisco CA.
- Brown, L.S. (1996, November) *PTSD in civil litigation: Forensic evaluation and testimony*. Chair of workshop presented at the 12th Annual Meeting, International Society for Traumatic Stress Studies, San Francisco CA.
- Brown, L.S. (1996, October). *Feminist therapy: Creating the egalitarian relationship*. Invited workshop presented at the American Academy of Psychotherapists Annual Institute and Conference, Atlanta GA.
- Brown, L.S. (1996, October). Ethical and legal considerations for feminist practice with recovered memories. Presented at a symposium, *Feminist psychology and the recovered memory debate*. Annual Conference of the SE Regional Chapter, Association for Women in Psychology, Hilton Head SC.
- Brown, L.S. (1996, October). *The continuing adventure: Inventing and reinventing theory in feminist psychology*. Invited plenary address at the Annual Conference, SE Regional Chapter, Association for Women in Psychology, Hilton Head SC.
- Brown, L.S. (1996, October). *The politics of memory: Whose science, whose history*. Plenary invited lecture at a conference Memory: Authorizing the Twentieth Century, University of Colorado, Boulder CO.
- Brown, L.S. (1996, August). *The private practice of subversion: Psychotherapy as Tikkun Olam*. Awards address presented at the 104th Annual Convention of the American Psychological Association, Toronto Ontario Canada.
- Brown, L.S. (1996, June). *Psychotherapy and assessment in the context of sexual harassment*. Workshop presented at the conference of the Florida Psychological Association, West Palm Beach FL.
- Brown, L. S. (1996, June). *The recovered memory debate: What do we know now*. Workshop presented at the conference of the Florida Psychological Association, West Palm Beach.
- Brown, L.S. (1996, June). Strategies for enhancing client empowerment in cases of recovered memory. In W. Freed (Chair) *The recovered memory debate: Scientific and clinical issues*. Symposium presented at the Second International Conference of the ISTSS, Jerusalem Israel.
- Brown, L.S. (1996, April). *Dissociation as a coping strategy in the face of trauma*. Workshop presented at the Children's Justice Conference, Bellevue WA.
- Brown, L.S. (1996, April). *Healing the traumatized woman: Strategies for effective intervention*. Workshop presented at the 11th Regional Conference on Trauma, Dissociation and Related Disorders, Akron OH.
- Brown, L.S. (1996, April). *An introduction to feminist therapy theory and practice*. Workshop presented at Austin Women's Psychotherapy Project, Austin TX.
- Brown, L.S. (1996, April). *False memories or false issues: What's really happening in therapy?* Lecture presented at Austin Women's Psychotherapy Project, Austin TX.

- Brown, L.S. (1996, March). Supporting clients with containment in the memory recovery process. In S. Gold (Chair) *Alternatives to memory recovery*, Symposium presented at the Mid-Winter Convention of the Divisions of Psychology, Independent Practice, and Family Psychology, Scottsdale AZ.
- Brown, L.S. (1996, March). *Theory in feminist therapy: Where from here?* Invited awards address presented at the 21st Annual Convention, Association for Women in Psychology, Portland OR.
- Brown, L.S. (1996, March). Ethical and legal implications of the delayed memory debate. In K. Quina (Chair). *Making the personal political and theoretical: Feminist perspectives on the delayed memory debate*. Symposium presented at the 21st Annual Convention, Association for Women in Psychology, Portland OR.
- Brown, L.S. (1996, February). *Heterosexism in the construction of women's sexuality*. Presented at the Mid-Winter Conference of the Division of Psychology of Women, Knoxville TN.
- Brown, L.S. (1995, November). The clinicians' critique of the memory scientists. In J. Herman (Chair). *Clinicians' report from the APA Working Group on Memories of Abuse*. Symposium presented at the annual meetings of the International Society for Traumatic Stress Studies, Boston MA.
- Brown, L.S. (1995, October). *Clinical and forensic considerations with the remembering client*. Workshop presented at the Fall Meeting of the Washington State Psychological Association, Tacoma WA.
- Brown, L.S. (1995, October). *Subversive dialogues: Feminist therapy*. Workshop presented at the California Institute of Integral Studies, San Francisco CA.
- Brown, L.S. (1995, September). Evaluating future damages. Presented at a symposium, *Violence: Liability and Damages*, Washington State Trial Lawyers Association, Seattle WA.
- Brown, L.S. (1995, August). Theory-building as feminist practice. In R. Nutt (Chair) *The many faces of feminist practice*, Symposium presented at the 103rd Annual Convention of the American Psychological Association, New York NY.
- Brown, L.S. (1995, August). Feminist issues in evaluation and testimony in recovered memory cases. In L.S. Brown (Chair), *Feminist forensic psychology: An emerging field of feminist practice*. Symposium presented at the 103rd Annual Convention of the American Psychological Association, New York NY.
- Brown, L.S. (1995, June). *Preventing heterosexism in psychotherapy*. Workshop presented at the Vermont Conference on Primary Prevention, Burlington VT.
- Brown, L.S. (1995, April). *Not the Ethics 101 Class: Empowering therapists as ethical decision-makers*. CHASTEN Spring Workshop Series, Toronto Ontario Canada.
- Brown, L.S. (1995, April). *Sexual harassment: Conceptual issues for forensic practitioners*. Presented at the Fifth Annual University of Miami Law School National Symposium: Mental Health and the Law, Ft. Lauderdale FL.
- Brown, L.S. (1995, February). Working with the treating therapist and expert witness. Presented at a symposium, *Representing victims of sexual abuse*, Washington State Trial Lawyers Association, Seattle WA.
- Brown, L.S. (1995, February). Forensic issues for the treating therapist of sexual abuse survivors. Lecture presented at a workshop, *Feminist approaches to trauma treatment*, Center for Community Counseling, Eugene OR.
- Brown, L.S. (1995, February). *Standards for practice after Ramona: Issues for forensic practitioners*. Invited lecture, American Academy of Forensic Sciences Annual Meeting, Seattle WA.
- Brown, L.S. (1994, October). *The recovered memory debate: Issues for clinicians*. Lecture presented at the Fall Convention, Washington State Psychological Association, Bellevue WA.

- Brown, L.S. (1994, October). *When the therapist is a woman: Responding to same-sex abuse in therapy*. Workshop presented at the Third It's Never Okay Conference, Toronto Ontario Canada.
- Brown, L.S. (1994, October). *Mind-rape: Non-sexual abuse and malpractice in therapy*. Workshop presented at the Third It's Never Okay Conference, Toronto Ontario Canada.
- Brown, L.S. (1994, September). *Avoiding heterosexism in psychotherapy and counseling*. Workshop presented at the University of Georgia, Athens GA.
- Brown, L.S. (1994, September). *The lesbian/gay paradigm; Directions for the 21st Century*. Inaugural invited lecture, Andrea Colley Memorial Lecture Series, Women's Studies Program, University of Georgia, Athens GA
- Brown, L.S. (1994, September). *The recovered memory controversy; Facts and realities*. Lecture presented for the East Side Sexual Assault Center Consultation, Bellevue WA.
- Brown, L.S. (1994, August).. *When your patient is the plaintiff: Staying sane as the psychotherapist*. In K.S. Pope, (Chair). *When your patient is the plaintiff: A new look*. Symposium presented at the 102nd Annual Convention of the American Psychological Association, Los Angeles CA.
- Brown, L.S. (1994, August). *Gender issues in lesbian couples*. In R.Scrivner (Chair), *Gender role as a factor in gay male and lesbian couples*. Symposium presented at the 102nd annual Convention of the American Psychological Association, Los Angeles CA.
- Brown, L.S. (1994, August). *The role of the expert witness and treating therapist in sexual harassment cases after Harris v. Forklift*. In J. Goodman (chair), *Sexual harassment after Harris v. Forklift*. Symposium presented at the 102nd Annual Convention of the American Psychological Association, Los Angeles CA.
- Brown, L.S. (1994, August). *The politics of recovered memory*. Discussion hour presented at the 102nd Annual Convention of the American Psychological Association, Los Angeles CA.
- Brown, L.S. (1994, June). *Why you don't have to be afraid of false memory lawsuits*. Presented at a workshop *Avoiding False Memory Syndrome Lawsuits*, Seattle WA.
- Brown, L.S. (1994, April). *New voices, many visions: Theory in feminist therapy*. Workshop presented for Tampa Bay Women Therapists Association and the U. of South Florida, Tampa FL.
- Brown, L.S. (1994, April). *Feminist therapy and health care reform*. Presented at the Northwest Women's Studies Conference, Tacoma WA.
- Brown, L.S. (1994, March). *On being Jewish and feminist*. In L. Obler (Chair). *Jewish feminists in psychology*. Symposium presented at the conference of the Association for Women in Psychology, Oakland CA.
- Brown, L.S. (1994, January). *Subversive dialogues: Theoretical perspectives in feminist therapy*. Workshop presented for the Midwinter Meeting of the Georgia Psychological Association, Asheville NC
- Brown, L.S. (1994, January). *Feminist ethics in psychotherapy: Strategies for decision-making*. Workshop presented at the Midwinter Meeting of the Georgia Psychological Association, Asheville NC
- Brown, L.S. (1993, August). *Feminist therapy theory: Applications to family psychology*. Invited address, Convention of the American Psychological Association, Toronto Ontario Canada.
- Brown, L.S. (1993, August). *The case for therapy*. In E. Rothblum, (Chair), *Can radical lesbian feminism coexist with psychology?* Symposium presented at the Convention of the American Psychological Association, Toronto Ontario Canada.

- Brown, L.S. (1993, April). *The perils of diagnosis*. Keynote Address, Conference on Ending Violence Against Women, University of Western Ontario, London Ontario Canada.
- Brown, L.S. (1993, April). Models of Clinical Supervision. In C. Freeman, (Chair), *The supervisory relationship*. Symposium presented at the Spring Meetings of the Washington State Psychological Association, Seattle WA.
- Brown, L.S. (1993, March). *Dealing with encroaching legalism in the APA Ethics Code*. Workshop presented at the Annual Conference of the Association for Women in Psychology, Atlanta GA.
- Brown, L.S. (1993, March). *Becoming a diplomat: A workshop for feminist therapists*. Presented at the Annual Conference of the Association for Women in Psychology, Atlanta GA.
- Brown, L.S. (1992, October). *Shattered expectations as trauma in therapy abuse*. Workshop presented at the meetings of the International Society for Traumatic Stress Studies, Los Angeles CA.
- Brown, L.S. (1992, August). Anti-domination training as an essential component of diversity in clinical psychology. In L. Comas-Diaz, Chair, *Achieving diversity in clinical psychology*, Symposium presented at the 100th Annual Convention of the American Psychological Association, Washington DC.
- Brown, L.S. (1992, August). *Feminist therapy perspectives on the 1992 APA Ethics Code Revision*. Discussion hour presented at the 100th Annual Convention of the American Psychological Association, Washington DC.
- Brown, L.S. (1992, August). Identity management issues in the workplace as a quality of life issue. In L. Garnets, Chair, *Quality of life for lesbians and gay men*. Symposium presented at the 100th Annual Convention of the American Psychological Association, Washington DC.
- Brown, L.S. (1992, August). How can we make psychology genuinely multicultural? In G. Gottsegen, Chair, *Psychology at Work: Centennial Panel*, Symposium presented at the 100th Annual Convention of the American Psychological Association, Washington DC.
- Brown, L.S. (1992, August). Discussant in A. Lawler, Chair, *Feminist perspectives on codependency*. Symposium presented at the 100th Annual Convention of the American Psychological Association, Washington DC.
- Brown, L.S. (1992, June). *Using DSM-III-R with culturally diverse populations*. Workshop presented at RIAGG Amsterdam-Oost, Amsterdam, The Netherlands
- Brown, L.S. (1992, June). Trauma "within the range" of usual experience." In L.S. Brown, Chair, *Feminist therapy perspectives on trauma*, Symposium presented at the First International Congress of the International Society for the Study of Traumatic Stress, Amsterdam, The Netherlands.
- Brown, L.S. (1992, June). Feminist therapy with lesbian trauma survivors: Clinical considerations for the population. In L.E.A. Walker, Chair, *Feminist therapy with trauma survivors*, symposium presented at the First International Congress of the International Society of the Study of Traumatic Stress, Amsterdam, The Netherlands
- Brown, L.S. (1992, February). *Women's adult development*. Workshop presented at the Third Conference on Women, Washington State Psychological Association, Seattle, WA.
- Brown, L.S. (1991, December). *Feminist therapy ethics*. Workshop presented for the Feminist Counseling Association of Western Canada, Vancouver BC Canada.
- Brown, L.S. (1991, December). *The integration of heart and mind: Becoming adult women*. Invited Lecture, American Psychological Association Centennial Series on Human Development, Washington DC.
- Brown, L.S. (1991, November). *Boundary dilemmas in feminist psychotherapy*. Workshop presented for the Women's Counseling Referral and Education Centre, Toronto Ontario Canada.

- Brown, L.S. (1991, August). Discussant, in L.S. Brown, (Chair) *Dealing with the continuum of boundary dilemmas in psychotherapy*. Symposium presented at the Convention of the American Psychological Association, San Francisco CA.
- Brown, L.S. (1991, August). The effect of the report process in treatment of therapy abuse survivors. In K. Saakvitne (Chair), *Treating victims of abusive psychotherapies: Clinical, ethical, and countertransference issues*. Symposium presented at the Convention of the American Psychological Association, San Francisco CA.
- Brown, L.S. (1991, August). *Future directions for the lesbian/gay paradigm for psychology*. Invited address, Convention of the American Psychological Association, San Francisco CA.
- Brown, L.S. (1991, May) *The importance of a multicultural perspective*. Invited address at the Annual Conference of the Interaktie Akademie, Antwerp, Belgium.
- Brown, L.S. (1991, March). *New voices, new visions: A lesbian paradigm for the psychology of women*. Invited address presented at the meeting of the Division of Women, Georgia Psychological Association, Atlanta GA.
- Brown, L.S. (1990, October) *Ethical considerations in the treatment of lesbian and gay male clients*. Presentation at the Fall Meeting of the Washington State Psychological Association, Bellevue WA.
- Brown, L.S. (1990, October). *Therapy in another mother tongue: Working with the sexual minority client*. Keynote address at a conference, Counseling the Lesbian, Gay and Bisexual Client, Ithaca NY.
- Brown, L.S. (1990, August) Anti-racism as an ethical imperative in feminist therapy. In L.S. Brown (Chair) *Ethics in feminist therapy: Next steps*. Symposium presented at the Convention of the American Psychological Association, Boston, MA.
- Brown, L.S. (1990, August). Making psychology safe for lesbians and gay men. In A. Smith (Chair) *Future directions in lesbian and gay issues in psychology*. Symposium presented at the Convention of the American Psychological Association, Boston, MA.
- Brown, L.S. (1990, August) Sex in a vacuum: Heterosexism in the social construction of women's sexuality. In C. Travis (Chair) *The social construction of women's sexuality*. Symposium presented at the Convention of the American Psychological Association, Boston, MA.
- Brown, L.S. (1990, August) *The meaning of a non-homophobic psychology*. Conversation hour presented at the Convention of the American Psychological Association, Boston MA.
- Brown, L.S. (1990, May) *The future of feminist therapy*. Presented at the Feminist Practice Conference, UW School of Social Work, Seattle WA.
- Brown, L.S. (1990, March) *What are the next steps in feminist therapy ethics?* Presented at the Conference of the Association for Women in Psychology, Tempe AZ.
- Brown, L.S. (1990, January) *Future issues for feminist psychology*. Invited address given at a conference on Women and Psychology presented by the Colorado Women Psychologists, Denver CO.
- Brown, L.S. (1989, August) Victimization as a risk factor for depression in women. In S. Noelen-Hoeksma (Chair) *Special topics in women and depression*. Symposium presented at the Convention of the American Psychological Association, New Orleans, LA.
- Brown, L.S. & Gonsiorek, J. (1989, August). *Ethical concerns for lesbian and gay male therapists*. Conversation hour presented at the Convention of the American Psychological Association, New Orleans, LA.
- Brown, L.S. (1989, March). *Working with lesbian and gay clients and their families*. Continuing Psychological Education Workshop presented at a meeting of Colorado Women Psychologists, Denver CO.

- Brown, L.S. (1988, December). *Feminist therapy perspectives on psychodiagnosis: Beyond DSM and ICD*. Keynote address presented at the First International Congress on Mental Health Care for Women, Amsterdam, The Netherlands.
- Brown, L. S. (1988, September) *Treating the victims of abusive therapists*. Continuing education workshop presented at a conference on Women and Psychology, Washington State Psychological Association, Tacoma WA.
- Brown, L.S. (1988, September) *Current issues and developments in feminist therapy*. Presented at a conference on Women and Psychology, Washington State Psychological Association, Tacoma WA.
- Brown, L.S. (1988, August) Feminist therapy ethical issues with special populations. In E. Rave (Chair) *Feminist therapy ethics*, Symposium presented at the Convention of the American Psychological Association, Atlanta GA.
- Brown, L.S. (1988, August) Taking account of gender and sexuality issues in clinical assessment. In K. Pope (Chair) *Doing valid and useful clinical assessment*, Symposium presented at the Convention of the American Psychological Association, Atlanta GA.
- Brown, L.S. (1988, August). *New voices, new visions: towards a lesbian/gay paradigm for psychology*. Presidential address presented at the Convention of the American Psychological Association, Atlanta GA.
- Brown, L.S. (1988, May) *The meaning of a multicultural perspective for theory- building in feminist therapy*. Seventh Advanced Feminist Therapy Institute, Seattle WA.
- Brown, L.S. (1987, August) Toward a new conceptual paradigm for the Axis II diagnoses. Presented at a symposium on *DSM-III-R*. 95th Convention of the American Psychological Association, New York NY.
- Brown, L.S. (1987, August) Beyond "Thou shalt not:" Developing conceptual frameworks for ethical decision-making. Presented at a symposium, *Ethical and boundary dilemmas for lesbian and gay psychotherapists*. 95th Convention of the American Psychological Association, New York NY.
- Brown, L.S. (1987, May) *Training issues for white feminist therapists working with women of color trainees*. Paper presented at the Sixth Advanced Feminist Therapy Institute, Chicago, IL.
- Brown, L.S. (1987, March) Lesbians and gay men as adult members of their families of origin: Basic clinical issues. Presented at a symposium, *Lesbians and Gay Men and Their Families*. Midwinter conference of the Divisions of Psychotherapy, Independent Practice, and Family Psychology, New Orleans, LA.
- Brown, L.S. (1987, January) *Learning to think about ethics: A guide for the perplexed lesbian feminist therapist*. Invited keynote address, Boundary dilemmas in the client-therapist relationship: A working conference for lesbian therapists. Los Angeles, CA.
- Brown, L.S. (1986, November) What's missing in graduate training in psychology? Presented at a discussion program, *The future of graduate training in psychology*. Fall Meeting of the Washington State Psychological Association, Everett, WA.
- Brown, L. S. (1986, August) Negative impacts of post-termination sexual relationships between clients and therapists. Presented at a symposium, *Relationships with patients after termination: Ethical, clinical and legal issues*. Convention of the American Psychological Association, Washington DC.
- Brown, L.S. (1986, August) A time to be critical: New directions in lesbian- affirmative psychotherapy. Presented at a symposium, *Advances in Gay- Affirmative Psychotherapy*. Convention of the American Psychological Association, Washington DC.

- Brown, L.S. (1986, August) Diagnosis and the zeitgeist: The politics of masochism in the DSM-III-R. Presented at a symposium, *The politics of diagnosis*, Convention of the American Psychological Association, Washington DC.
- Brown, L.S. (1986, August) Fat oppression and psychotherapy; a new look at the meaning of body size. Presented at a symposium, *Disordered or Displaced: Women in Context*. Convention of the American Psychological Association, Washington DC.
- Brown, L.S. (1986, May) *Confronting ethically problematic feminist therapists*. Paper presented at the Fifth Annual Advanced Feminist Therapy Institute, Minneapolis, MN.
- Brown, L.S. (1985, November) *Assessment and diagnosis in feminist therapy*. Continuing Education Workshop presented at the Fall Meeting of the Washington State Psychological Association, Seattle, WA.
- Brown, L.S. (1985, August) Sexual issues in the development of lesbian couples. Paper presented at a symposium, *A developmental approach to therapy with lesbian couples*. A Convention of the American Psychological Association, Los Angeles, CA.
- Brown, L.S. (1985, August) Employment issues for lesbian and gay male clinicians. Paper presented at a symposium, *Employment concerns of lesbian and gay male psychologists*. Convention of the American Psychological Association, Los Angeles, CA
- Brown, L.S. (1985, June) A continuing education model for training in feminist therapy. Paper presented at a symposium, *Three approaches to training in feminist therapy*. Conference of the National Women's Studies Association, Seattle, WA.
- Brown, L. S. (1985, April) *Ethical and conceptual issues in the development of feminist therapy theory*. Paper presented at the Fourth Advanced Feminist Therapy Institute, Bal Harbour, FL.
- Brown, L.S. (1984, October) *An introduction to feminist therapy theory*. Continuing Education Workshop presented at the Fall Meeting of the Washington State Psychological Association, Seattle, WA.
- Brown, L.S. (1984, May) *An Introduction to Feminist Psychology*. Lecture presented at the Spring Meeting of the Washington State Psychological Association, Spokane, WA.
- Brown, L.S. (1984, May) Psychology and Social Issues: Creating a Zeitgeist for Knowledge, Fulfilling Ethical Responsibilities to our Communities. Presented at a symposium, *Should WSPA Get Involved in Social Issues?*, Spring Meeting of the Washington State Psychological Association, Spokane, WA.
- Brown, L.S. (1984, March) *Power and responsibility: Developing ethical guidelines for feminist therapists*. Presented at the Third Advanced Feminist Therapy Institute, Oakland, CA.
- Brown, L.S. (1984, March) *What psychologists working in the media need to know about women's issues*. Presented at the Mid-Winter Conference of the Division of Psychotherapy/Division of Private Practice, San Diego, CA.
- Brown, L.S. (1984, May and 1983, October) *An introduction to therapy issues with lesbian and gay male clients*. Continuing education workshop presented at the Fall Meeting, Seattle, WA, and the Spring Meeting, Spokane WA of the Washington State Psychological Association.
- Brown, L.S. (1983, August) *Sexual issues in therapy with lesbian clients*. Workshop presented at the meeting of the Association of Lesbian and Gay Psychologists, Anaheim, CA.
- Brown, L.S. (1983, August) The lesbian feminist therapist and her community. Paper presented at a symposium, *The Female Therapist in Private Practice*. Convention of the American Psychological Association, Anaheim, CA.



- Brown, L.S. (1983, May) *Women, weight, and power*. Presented at the Second Advanced Feminist Therapy Institute, Washington, DC.
- Brown, L.S. (1983, March) Finding new language: Beyond analytic verbal shorthand. Presented at a symposium, *Toward developing theory in feminist therapy*. Tenth Annual Conference of the Association for Women in Psychology, Seattle, WA.
- Brown, L.S. (1983, March) "Over"weight and "over"eating: The standards and their impact on women. Presented at a symposium, *The Role and Impact of Food and Body-Image in Women's Lives*. Convention of Association for Women in Psychology, Seattle, WA.
- Brown, L.S. (1982, August) Internalized oppression as an issue in sex therapy with lesbians. Presented at a symposium, *Therapy With Lesbians*. Convention of the American Psychological Association, Washington, DC.
- Brown, L.S. (1982, May) Ethical issues in feminist therapy: What is a feminist ethic? Presented at the First Advanced Feminist Therapy Institute, Vail, CO.
- Brown, L.S., DeWolfe, D, and Larson, E.R. (1979, December) *Sex therapy and education with lesbian and bisexual women*. Presented at the Fourth World Congress of Sexology, Mexico City, Mexico.
- Brown, L.S. (1979, March) *Academics and service providers: Allies or adversaries?* Presented at the Conference of the Association for Women in Psychology, Dallas, TX.
- Brown, L.S. (1979, March) *A developmental theory of lesbian sexual identity*. Presented at the Conference of the Association for Women in Psychology, Dallas, TX.
- Brown, L.S. (1978, April) *Assertiveness training: Issues for physical education instructors*. Presented at the Conference of the American Alliance for Health, Physical Education, and Recreation. Kansas City, MO.
- Brown, L.S., May, C., and Landis, S. (1978, March) *A sexuality workshop for women loving women*. Presented at the Conference of the Association for Women in Psychology, Pittsburgh, PA.
- Brown, L.S. (1978, March) Hoisting scholars by their own petards. Presented at a symposium, *Festschrift in Honor of Joan Evansgardner*. Conference of the Association for Women in Psychology, Pittsburgh, PA.
- Brown, L.S. (1978, March) *Supervisory issues in feminist therapy*. Presented at the Conference of the Association for Women in Psychology, Pittsburgh, PA.
- Brown, L.S. (1977, August) Sexual assertiveness and contraceptive behavior: An intriguing connection. Presented at the *Open Symposium on Issues and Research in the Psychology of Women*. Convention of the American Psychological Association, Toronto, Ontario, Canada, August.
- Brown, L.S. (1976, August) Teaching a Psychology of Women course as a consciousness-raising technique. Presented at a symposium, *Consciousness- Raising in an Academic Setting*. Convention of the American Psychological Association, Washington, DC.
- Brown, L.S. (1976, August) Free Women: Creativity and madness in the fiction of Doris Lessing. Presented at a symposium, *If Shakespeare Had A Sister*, Convention of the American Psychological Association, Washington, DC.
- Brown, L.S., May, C., and Sprei, J. (1976, February) *Sexual and sensual awareness: A consciousness-raising experience for women*. Presented at the Conference of the Association for Women in Psychology, Knoxville, TN.
- Brown, L.S. (1975, August) *Investigating the stereotypic picture of lesbians in the clinical literature*. Presented at the Convention of the American Psychological Association, Chicago IL.

Miller, H.R., Liss-Levinson, N., Levinson, W., Gulanick, N, Brown, L.S., Coleman, E., and Sullivan, R. (1975, March) *Social skills training*. Workshop presented at the Convention of the American Personnel and Guidance Association.

Brown, L.S. (1975, January) *Recent research on gay women*. Presented at the Conference of the Association for Women in Psychology, Carbondale, IL.

## **PROFESSIONAL ACTIVITIES**

### American Psychological Association

Committee on Women in Psychology, 1984-86  
Education Directorate Roster of Accreditation Site Visitors, 1984- 1993  
Board of Social and Ethical Responsibility in Psychology, 1987-89.  
Liaison on diagnostic issues to American Psychiatric Association, 1985-1993.  
Policy and Planning Board, 1993-1995.  
Working Group on Recovered Memories of Childhood Sexual Abuse, 1993-1995.  
Committee on Lesbian, Gay and Bisexual Concerns, 1997-1999.  
Ethics Code Revision Task Force, 1997-2001.  
Candidate for President, 1997 (Nominated and declined, 1998, 2001, 2005)  
Post-Traumatic Stress Disorder Treatment Guidelines Working Group, 2012-present

### Washington State Psychological Association

Committee on Lesbian and Gay Concerns,(Co-Chairperson, 1984-1986), 1984- present  
Provider Issues Committee, 1987-88  
Professional Standards and Ethics Review Committee, 1988-90.  
Women's Conference Committee, 1988-90.  
President Elect-Elect, 1990.  
President-Elect, 1991.  
Convention Program Chair, 1991.  
Workgroup on prescriptive privileges, 1990-1994.  
President, 1992.  
Past-President, 1993  
State Legislative Advocacy Coordinator, 1993-1994  
Webmaster, 2001-2003.

### Society for the Psychological Study of Social Issues, Division 9 of APA

Liaison to the APA Committee on Lesbian and Gay Concerns, 1987-1989.  
Otto Klineberg International Relations Award Committee, 1991.

### Society of Clinical Psychology, Div. 12 of APA

Committee on Diversity, 1991-1998  
Publications Committee, 1994-1998

### Division of Psychotherapy, Div. 29 of APA

Publications Board, 2007-2013  
Website redesign task force chair, 2008

### Society for the Psychology of Women, Div. 35 of APA.

Chairperson, Nominations Committee, 1985-86  
Chairperson, APA Program Review Committee, 1984-1985.  
Chair Lesbian Issues Task Force, 1983-85  
Co-Chairperson Committee on Clinical Training and Practice, 1985-88,  
Chairperson, Sub-committee on Accreditation Issues,1985-90.  
APA Convention Program Reviewer, 1984 and 1986

Co-Chair, Task Force on Media and Consumer Issues, 1988-90.  
Co-Chair ,Section on Feminist Professional Practice and Training,1989-90.  
Newsletter Editor, Section on Feminist Professional Training and Practice, 1990-91.  
Task Force on Diversity in Feminist Psychology, 1990-91.  
Participant and Theory Group Co-Facilitator, National Conference on Training in Feminist Practice, 1993  
President-Elect, 1995-1996.  
President, 1996-1997.  
Past-President, 1997-1998  
Coordinator, Academy of Feminist Practice, 1996-present  
Representative to APA Council, 1999-2001  
Webmaven, 2004-2005  
Representative to APA Council 2007-2009  
Representative to Divisions for Social Justice, 2007-2009  
Member, Working Group on the 2017 Ethics Code Revision

Division of Independent Practice, Div. 42 of APA

Co-Chair, Continuing Education Committee, 2005-2007

Division of Family Psychology, Div. 43 of APA.

Chairperson, Committee on Lesbian and Gay Issues, 1984-1986  
Committee on gender issues, 1986-88.  
Committee on diversity, 1995-1997.

Society for the Psychological Study of Lesbian and Gay Issues -Division 44 of APA.

President-Elect, 1986-87  
President, 1987-89  
Past-President, 1989-1990  
Fellows Chair, 1989-91  
Nominations Chair, 1989-91  
Awards Committee Co-Chair, 1988-1989.  
Fellows Chair, 2003-2006  
Member, Fellows Committee, 2006-present  
Web Editor, 2007-2010

Society for the Psychological Study of Ethnic Minority Issues-Division 45 of APA

Member at Large for Diversity of the Executive Committee, 2003-2006

Division of Media Psychology, Div. 46 of APA

Committee on Lesbian and Gay Issues, Chair, 1995.  
Committee on Diversity, 1996-1997.

Division of Trauma Psychology, Div. 56 of APA

Web Editor, 2006-2012  
Policy Committee, 2006-2012  
Publications Committee, 2006-2012  
Practice Committee , 2006-2012  
Program Committee, 2006-2012  
President- Elect, 2009  
President, 2010  
Past-President, 2011  
Representative to the New Haven Trauma Competencies Conference, 2013.

Feminist Therapy Institute

Steering Committee 1983-1988  
Coordinator of Committees 1984-86  
Training Committee, 1983-1987

Newsletter Editor 1983-1987  
Membership/Outreach Committee 1983-1987  
Ethics and Accountability Committee 1983-1990  
Annual Conference Committee Co-Chair, 1987-88  
Committee on Diversity Co-Chair, 1987-88

Association for Women in Psychology

Feminist internship roster coordinator, 1973-75  
Committee Coordinator 1975-77  
Feminist therapy roster coordinator 1977-79  
National conference coordinator, 1975, 1983.

American Psychological Foundation

Advisory Board, Wayne Placek Fund, 1993-1995  
Advancement Committee, 2010-2012

International Society for Traumatic Stress Studies

Program Committee, 1995  
Program Committee, 1997-1998  
Program Committee 2007  
Diversity Special Interest Group, 2005-present

International Society for the Study of Dissociation

Awards Committee, 1999  
Chair, Film and Media Committee, 2003-2004

# Exhibit B



# AMERICAN PSYCHOLOGICAL ASSOCIATION

May 29, 2018

## Statement of APA President Regarding the Traumatic Effects of Separating Immigrant Families

WASHINGTON — Following is the statement of APA President Jessica Henderson Daniel, PhD, regarding the deleterious impact on the health and well-being of children and families who are separated as they seek to enter the United States without proper documentation:

“The administration’s policy of separating children from their families as they attempt to cross into the United States without documentation is not only needless and cruel, it threatens the mental and physical health of both the children and their caregivers. Psychological research shows that immigrants experience unique stressors related to the conditions that led them to flee their home countries in the first place. The longer that children and parents are separated, the greater the reported symptoms of anxiety and depression for the children. Negative outcomes for children include psychological distress, academic difficulties and disruptions in their development.

“The American Psychological Association calls on the administration to rescind this policy and keep immigrant families intact (</advocacy/immigration/index.aspx>) . We support practical, humane immigration policies that consider the needs of immigrants, and particularly immigrant families. We must adopt policies that take into account what we know about the harmful, long-term psychological effects of separation on children and their families. This is not an acceptable policy to counter unlawful immigration.”

*The American Psychological Association, in Washington, D.C., is the largest scientific and professional organization representing psychology in the United States. APA's membership includes nearly 115,700 researchers, educators, clinicians, consultants and students. Through its divisions in 54 subfields of psychology and affiliations with 60 state, territorial and Canadian provincial associations, APA works to advance the creation, communication and application of psychological knowledge to benefit society and improve people's lives.*

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**Find this article at:**

<http://www.apa.org/news/press/releases/2018/05/separating-immigrant-families.aspx>

# Exhibit C



AMERICAN  
PSYCHOLOGICAL  
ASSOCIATION

June 14, 2018

President Donald Trump  
The White House  
1600 Pennsylvania Avenue  
Washington, DC 20500

Dear President Trump:

On behalf of the American Psychological Association (APA), we are writing to express our deep concern and strong opposition to the Administration's new policy of separating immigrant parents and children who are detained while crossing the border. We previously wrote to then Secretary of Homeland Security John Kelly on April 5, 2017, about this matter. Based on empirical evidence of the psychological harm that children and parents experience when separated, we implore you to reconsider this policy and commit to the more humane practice of housing families together pending immigration proceedings to protect them from further trauma.

APA is the leading scientific and professional organization representing psychology in the United States. Our membership includes researchers, educators, clinicians, consultants, and students. APA works to advance the creation, communication, and application of psychological knowledge to benefit society and improve people's lives. We have 115,700 members and affiliates across the United States and in many other countries, many of whom serve immigrant youth and adults in a wide range of settings, including schools, community centers, hospitals and refugee resettlement centers.

The current policy calls for children to be removed from their parents and placed for an often indeterminate period of time in the custody of the Office of Refugee Resettlement. Decades of psychological research have determined that it is in the best interest of the child and the family to keep families together. Families fleeing their homes to seek sanctuary in the United States are already under a tremendous amount of stress.<sup>1</sup> Sudden and unexpected family separation, such as separating families at the border, can add to that stress, leading to emotional trauma in children.<sup>2</sup> Research also suggests that the longer that parents and children are separated, the greater the reported symptoms of anxiety and depression are for children.<sup>3</sup> Adverse childhood experiences, such as parent-

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<sup>1</sup> Chaudry, A. (2011). Children in the aftermath of immigration enforcement. *The Journal of the History of Childhood and Youth*, 4 (1), 137-154.

<sup>2</sup> Dreby, J. (2012). The burden of deportation on children in Mexican immigrant families. *Journal of Marriage and Family*, 74, 829-845. Doi:10.1111/j.1741-3737.2012.00989x

<sup>3</sup> Suárez-Orozco, C., Bang, H.J. & Kim, H.Y (2010). I felt like my heart was staying behind: Psychological implications of family separations and reunifications for immigrant youth. *Journal of Adolescent Research* 26(2), 222-257.

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child separation, are important social determinants of mental disorders. For children, traumatic events can lead to the development of post-traumatic stress disorder and other mental health disorders that can cause long lasting effects.<sup>4</sup> Furthermore, immigration policies, such as separating families at the border, can also adversely impact those immigrants who are already in the United States. They can suffer from feelings of stigmatization, social exclusion, anger, and hopelessness, as well as fear for the future.<sup>5</sup>

As a tragic example of the current policy's serious potential for harm, a Honduran man who was separated from his wife and 3-year-old son after he crossed the border into Texas recently took his own life while detained in a holding cell, according to the Customs and Border Protection officials, public records, and media reports.<sup>6</sup> There are also reports of detained immigrants foregoing legitimate claims for asylum by pleading guilty to expedite the return of their separated children and reports of parents being deported while their children, including infants, remain in custody. These incidents serve to highlight the mental health crisis for many families caused by the Administration's policy.

Given these considerations, a change in immigration policy regarding the detention of immigrant families at the border is desperately needed – from separating parents and children to housing them together and providing needed physical and mental health services. As psychologists, we have documented multiple harmful effects of parent-child separation on children's emotional and psychological development and well-being and urge that the current policy of family separation be reversed. Should you have any questions regarding these comments, please contact Serena Dávila, J.D., with our Public Interest Directorate at [sdavila@apa.org](mailto:sdavila@apa.org) or 202-336-6061.

Sincerely,



Jessica Henderson Daniel, Ph.D., ABPP  
President



Arthur C. Evans, Jr., Ph. D.  
Chief Executive Officer

cc: U.S. Attorney General Jeff Sessions  
U.S. Secretary of Homeland Security Kirstjen Nielsen

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<sup>4</sup> Rojas-Flores, L., Clements, M., Koo, J. London, J. (2017). Trauma and Psychological Distress in Latino Citizen Children Following Parental Detention and Deportation. *Psychological Trauma: Theory, Research, Practice, and Policy*, Vol 9, No. 3, 352.

<sup>5</sup> Suárez-Orozco, C., (2017). Conferring Disadvantage: Behavioral and Developmental Implications for Children Growing up in the Shadow of Undocumented Immigration Status. *Wolters Kluwer Health, Inc.*, 426.

<sup>6</sup> Mays J. & Stevens M. (2018, June 10). Honduran Man Kills Himself After Being Separated From Family at U.S. Border, Reports Say. *The New York Times*. Retrieved from <https://www.nytimes.com/2018/06/10/us/border-patrol-texas-family-separated-suicide.html>.

# Exhibit 58



1 in the United States. It is currently ranked by U.S. News & World Report as the 14<sup>th</sup> best public  
2 health graduate program in the United States.

3 3. I work in the Department of Prevention and Community Health, where I teach  
4 several courses on child development and public health including: Child Development and  
5 Public Health, Social Ecology of Child & Adolescent Health, Social and Behavioral  
6 Approaches to Public Health, Social and Behavioral Science Research Methods, and Data  
7 Management and Analysis.

8 4. I hold a Bachelor of Arts in Art History from Emory University (1988), a Master  
9 of Social Work from the University of Georgia School of Social Work (1993), and a Doctor of  
10 Philosophy from the Department of Maternal and Child Health at the Johns Hopkins  
11 Bloomberg School of Public Health (1999).

12 5. I have held academic positions for over 10 years. Prior to working at Milken  
13 Institute School of Public Health, I was an Associate Professor at Georgia State University in  
14 the Department of Sociology (2010-2012) and an Assistant Professor at Johns Hopkins  
15 Bloomberg School of Public Health in the Department of Population, Family, and  
16 Reproductive Health (2007-2010).

17 6. My academic work includes professional editorial board service. I am a  
18 Consulting Editor or Editorial Board member for seven family and social science journals  
19 including the *Journal of Marriage and Family*, *Journal of Research on Adolescence*, *Journal*  
20 *of Family Theory and Review*, *Journal of Youth and Adolescence*, *Journal of Family*  
21 *Psychology*, *Adolescent Research Review*, and *Applied Developmental Science*. I serve as a  
22 reviewer for 14 additional journals.

23 7. I am a Regular Member of the Psychosocial Development, Risk, and Prevention  
24 Study Section at the National Institutes of Health. I am also a member of flagship professional  
25 organizations focused on research with youth, including the Society for Research on  
26

1 Adolescence and the Society for Research on Child Development; in addition, for several  
2 years, I was a member of the National Council on Family Relations.

3 8. I have held several research positions and affiliations during my career. I was  
4 the Director of Research at the Johns Hopkins Leadership in Adolescent Health Training  
5 Program at the Johns Hopkins School of Medicine. I sit on the Senate Research Committee at  
6 The George Washington University and lead the community-engagement research module of  
7 the Clinical and Translational Science Institute at Children's Hospital in Washington, DC. I  
8 held several research positions at Johns Hopkins Bloomberg School of Public Health.

9 9. I have extensive research experience over the past 24 years. I have been the  
10 Principal Investigator or Co-Investigator in at least 15 studies. Many of these are focused on  
11 immigrant communities, U.S. Latino families, adolescent adjustment, or Latino adolescent  
12 health and well-being.

13 10. My research program examines parenting influences on the health and well-  
14 being of adolescents facing challenges tied to immigration status, neighborhood disadvantage,  
15 acculturation to the U.S., and/or discrimination. My research is informed by multiple  
16 disciplines: developmental psychology, urban sociology, family social sciences, and social  
17 epidemiology.

18 11. I have a high level of expertise in Latino immigrant families, adolescent health  
19 and well-being, and parents raising adolescents in challenging conditions. I have written over  
20 30 peer-reviewed journal articles, most of which relate to these subjects.

21 12. My research examining the impacts of recent immigration actions and news on  
22 the lives of U.S. Latino parents has been featured in national media including the NBC Nightly  
23 News, US News & World Report, and Vox.com.

24 13. I have attached a true and complete copy of my curriculum vitae as Exhibit A  
25 to this Declaration.  
26

1 **II. Impacts of Immigration Actions and News on the Lives of U.S. Latino Families**

2 14. Together with three colleagues, I recently conducted a study on the impacts of  
3 immigration policy changes and news on U.S. Latino families raising adolescent children. We  
4 published our findings in the *Journal of Adolescent Health* in March 2018. The article is  
5 entitled *Impacts of Immigration Actions and News and the Psychological Distress of U.S.*  
6 *Latino Parents Raising Adolescents*, and it is attached as Exhibit B to this Declaration.

7 15. My co-authors in this study were Elizabeth Vaquera, Ph.D (Department of  
8 Sociology and Department of Public Policy & Public Administration, The George Washington  
9 University); Rebecca M.B. White, Ph.D (T. Denny Sanford School of Social and Family  
10 Dynamics, Arizona State University); and Maria Ivonne Rivera, M.P.H. (The Rivera Group,  
11 Washington, D.C.).

12 16. Our study is one of the first empirical accounts of how recent immigration  
13 policy changes and news about those changes have impacted U.S. Latino parents—and by  
14 extension their teenage children. The study evaluated parents’ behavioral and emotional  
15 responses to recent immigration actions and news and investigated how these responses are  
16 associated with Latino parents’ psychological distress. It provides some of the first evidence  
17 to date indicating how U.S. Latino parents of adolescents cope, react, and manage emotions in  
18 response to immigration news and actions.

19 17. We began our analysis by recruiting 213 Latino (mostly Central American)  
20 parents of adolescents from a suburb of a large mid-Atlantic city. One-third of the parents in  
21 the study were undocumented. The remaining two-thirds were living in the U.S. legally, as  
22 citizens, permanent residents, or under Temporary Protected Status (TPS). Virtually all of the  
23 Latino adolescents whose parents were in this study were U.S. citizens, protected under the  
24 Deferred Action for Childhood Arrivals (DACA) program, or eligible for DACA.  
25  
26

1           18. We asked these parents a series of questions to find out how U.S. immigration  
2 actions and news had affected them in recent months. In addition, we used a standard  
3 questionnaire to assess symptoms of depression, anxiety, and other mental health problems.

4           19. We collected these surveys in the fall of 2017. Numerous immigration policy  
5 changes took place before, during, and immediately after our collection, including: (1)  
6 expanded eligibility for deportation, (2) the elimination of and/or plans to eliminate TPS, and  
7 (3) an end to DACA.

8           20. The results of our study strongly suggest that the recent changes in U.S.  
9 immigration policy have triggered serious psychological distress for many Latino parents,  
10 including those living in the United States legally.

11           21. Parents in all residency statuses reported that they “very often” or “almost  
12 always/always” experience adverse emotional and behavioral consequences due to  
13 immigration actions and news (*See* Table 2 in Exhibit B). These consequences include:  
14 difficulty getting or keeping a job; difficulty imagining a better job or more money; worrying  
15 it will be hard for their child to get a job; warning their child to stay away from authorities;  
16 worrying family members will be separated; changing daily routines; avoiding medical care,  
17 police, and services; feeling that their child was negatively affected; worrying it will be hard  
18 for their child to finish school; feeling that the parent was negatively affected; worrying about  
19 contact with police, authorities; talking to their child about changing their behavior such as  
20 where they hang out; and perceiving that their child was affected at school.

21           22. Although TPS parents were more likely than other groups to report concerns  
22 about safety and well-being of the family and children, substantial proportions of  
23 undocumented, permanent resident, and U.S. citizen parents reported these same concerns.

24           23. A high proportion of the parents (nearly 66%) reported that they very often or  
25 always worried about family members getting separated because of immigration actions or  
26

1 news. This included 88% of undocumented parents, 83.8% of TPS parents, 57.1% of  
2 permanent resident parents, and 21.6% of U.S. citizen parents.

3 24. A substantial proportion of the parents (nearly 40%) reported that they  
4 frequently avoided getting medical care, help from police, or support from social services  
5 because of immigration actions and news. This included 42% of undocumented parents, 62.2%  
6 of TPS parents, 34.3% of permanent resident parents, and 21.6% of U.S. citizen parents.

7 25. Almost half of all parents in this study reported that recent immigration events  
8 had led them to very often or always warn their teenagers to stay away from authorities (nearly  
9 48%) and to talk to their teenagers about changing their behaviors, such as where they hang  
10 out (nearly 47%).

11 26. Almost half of all parents in this study reported that their child had been  
12 negatively affected (44%) or that a parent had been negatively affected by immigration actions  
13 and news (nearly 45.2%).

14 27. Almost half of all parents in this study reported that, as a result of the  
15 immigration actions and news, they were worried that it would be hard for their child to finish  
16 school (46%) and they worried about their child getting a job (46.2%), and a substantial  
17 proportion reported that their child had been affected at school (nearly 37%).

18 28. Among parents who are not U.S. citizens, more than half (54.3%) moved to the  
19 United States in order to escape gangs and violence in their country of origin.

20 29. Extensive research has described stressors experienced by U.S. Latinos,  
21 including fear of deportation, exploitation by employers, trauma, distrust in public services,  
22 language barriers, racism, and financial strain. (See, e.g., Cavazos-Rehg et al., 2007; Rhodes  
23 et al., 2015; Yoshikawa et al., 2011). These stressors are important predictors of psychological  
24 distress, indicated by anxiety, depression, and somatization.  
25  
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1           30.     In our study, we documented substantially higher levels of psychological stress  
2 among U.S. Latino parents who do not have citizenship status. High distress characterized  
3 48.6% of TPS parents; 23.2% of undocumented parents; 27.1% of permanent resident parents;  
4 and 8.1% of U.S. citizen parents.

5           31.     Parents' adverse responses to immigration changes were associated with a  
6 significantly higher odds of a parent reporting high psychological distress. Parents who  
7 reported that immigration events caused them to frequently worry about their youth's  
8 education or future job chances or about family members being separated had at least a 200%  
9 greater odds of reporting high psychological distress.

10          32.     In several instances, adverse immigration responses were associated with a 5-  
11 to 10-fold greater odds of a parent reporting high psychological distress. The responses  
12 associated with these high odds of psychological distress included a parent having: been  
13 stopped, questioned or harassed by immigration authorities; avoided seeking medical care or  
14 assistance from police and government services; talked to their child about changing behaviors  
15 such as where the child hangs out; felt negatively affected; believed that their children had  
16 been negatively affected; expected that their children would now have a hard time finishing  
17 school; and thought that their children had been affected at school.

18          33.     Based on our study, we concluded that contemporary immigration actions and  
19 news about those actions likely have had profound and far-reaching adverse impacts on U.S.  
20 Latino parents raising adolescents.

21          34.     The study shows that the pernicious and harmful impacts of immigration  
22 actions and news may extend to Latino parents across a hierarchy of residency statuses.  
23 Parental worries and behavior modifications tied to immigration actions and news were shown  
24 to exist even among U.S. citizens of Latino origin. Across noncitizen groups, especially those  
25 with TPS, the effects were most prevalent, with parents experiencing concern for family, as  
26

1 indicated by parents warning their children to avoid authorities; avoiding medical care, public  
2 assistance, or the police; and worrying that their children had been negatively affected at school  
3 due to immigration actions and news.

4 35. Permanent resident parents were no different than undocumented parents with  
5 respect to several adverse responses to immigration actions and news. These two groups of  
6 parents were similar with respect to having frequently talked to their children about changing  
7 behaviors such as where the child hangs out; worried about contact with police and authorities;  
8 felt that the child was negatively affected at school; avoided seeking medical care, help from  
9 the police, and public services; changed daily routines; and, warned children to stay away from  
10 authorities.

11 36. Evidence suggesting adverse consequences of immigration actions and news  
12 across residency statuses is consistent with research indicating that immigration policy can be  
13 equally harmful to documented and undocumented Latinos. Our study showed that TPS  
14 parents, and in many cases, permanent resident parents, were harmed by immigration events,  
15 as were undocumented parents.

16 37. A substantial proportion of non-U.S. citizen parents frequently engaged in  
17 behaviors designed to avoid the attention of government authorities. These parental responses  
18 align with prior research indicating that Latino immigrants often hesitate contacting police for  
19 fear of mistreatment and/or the deportation of another family member.

20 38. Regardless of residency status, our study also found that a proportion of Latino  
21 parents (approximately 15% to 18%) reported that they “very often” or “always” considered  
22 leaving the United States and/or were stopped, harassed, or questioned by immigration  
23 authorities. These findings support the conclusion drawn by University of California Prof.  
24 Enriquez that “sanctions intended for undocumented immigrants seeped into the lives of  
25 individuals who should have been protected by their citizenship status.” (Enriquez, 2015).  
26

1           39.     Such high levels of distress among parents raise concerns about immigration  
2 impacts on the entire family, including among teenagers. Previous research suggests that a  
3 parent’s fear, anxiety or depression can spill over to affect the entire family, and especially  
4 teenagers. Studies show that adolescents whose parents are anxious or depressed are at elevated  
5 risk of doing poorly in school, adopting risky behaviors, and developing lifelong health and  
6 mental health problems. (See, e.g., Wheeler et al., 2015; McAdams et al., 2015; Lieb et al.,  
7 2002). Thus, the costs and burdens of psychological distress extend far beyond an affected  
8 individual.

9           40.     Our research demonstrated that almost two-thirds of parents frequently worried  
10 about family separation and close to half frequently warned their adolescent children to stay  
11 away from authorities, talked to their children about changing behaviors such as where they  
12 hang out, and avoided access to medical care, police, and public assistance. These kinds of  
13 parent behaviors and parents’ psychological distress directly threaten adolescent youth’s safety  
14 and mental and physical health

15           41.     The vast majority (75%) of parents in this study had adolescents who were U.S.  
16 citizens. The findings show that even Latino adolescents who are citizens and/or have grown  
17 up in the United States and are here legally, likely experience increased and serious risks to  
18 their health and well-being as a result of immigration actions and news.

19           42.     Our study demonstrates that immigration threats can have significant and  
20 measurable impacts well beyond the acute harm conferred to the subset of Latinos directly  
21 experiencing the events and impacted by the particular immigration policies and actions. This  
22 likely is because politics, threats of deportation, and anti-immigrant sentiments lead to  
23 widespread fear and anxiety among Latinos, even those not directly affected by the event. This  
24 holds true for Latinos of all residency statuses.

1 **III. The Likely Impacts of the Family Separation Policy**

2 43. The following opinions and testimony about the likely impacts of the family  
3 separation policy are based upon my education, experience, research and scholarship, and my  
4 expertise in Latino immigrant families in the U.S., and are offered on a more probable than not  
5 basis.

6 44. As indicated above, in paragraph 23, our study on the impact of immigration  
7 actions and news revealed that 66% of the U.S. Latino parents surveyed reported that they  
8 “very often” or “always” feel worried about family separation. This included 88% of  
9 undocumented parents, 83.8% of TPS parents, 57.1% of permanent resident parents, and  
10 21.6% of U.S. citizen parents.

11 45. Notably, our study occurred prior to the U.S. government’s immigration policy  
12 implementing family separation. It is likely that the fears of U.S. Latino parents about family  
13 separation will be more widespread and will have increased substantially as a result of the  
14 family separation policy. This is especially true considering the extensive media coverage and  
15 public debate that the family separation policy has generated.

16 46. Our study found that the odds of parents’ high psychological distress are 250%  
17 greater for parents who frequently worry that family members would get separated. As a result  
18 of the family separation policy, and the likely more widespread and increased levels of fear, it  
19 is likely that there is also a significant increase in the number of U.S. Latino parents  
20 experiencing high levels of psychological distress and harm, which impacts them and adversely  
21 impacts their adolescent children.

22 47. As our study also reveals, immigration policies that are focused on a small  
23 segment of the population have cascading negative impacts across much larger groups by  
24 virtue of the fear that these policies are shown to instill. It is likely the family separation policy  
25 is causing high levels of psychological distress and harm to those directly impacted with  
26

1 cascading negative impacts and detriments to the safety, health, and well-being of U.S. Latino  
2 families in Washington State and all over the country.

3 48. I am an active member of the Society for Research in Child Development  
4 (SRCD), the preeminent professional organization devoted to research in the field of child  
5 development. On June 20, 2018, the SRCD published *The Science is Clear: Separating*  
6 *Families Has Long-term Damaging Psychological and Health Consequences for Children,*  
7 *Families, and Communities*, which is our professional organization's Statement of the  
8 Evidence and compilation of research studies and evidence showing the harm caused by the  
9 family separation policy. Attached as Exhibit C to this declaration is a true and correct copy  
10 of this Statement of the Evidence, the contents of which I fully endorse and incorporate by  
11 reference herein.

12 I declare under penalty of perjury under the laws of the State of Washington and the  
13 United States of America that the foregoing is true and correct.

14 DATED this 22nd day of June, 2018 at Washington, DC, USA.

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18 KATHLEEN M. ROCHE

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Enriquez LM. Multigenerational punishment: Shared experiences of undocumented immigration status within mixed-status families. *J Marriage Fam* 2015;77:939-953.

Lieb R, Isensee B, Hofler M, Pfister H, Wittchen HU. Parental major depression and the risk of depression and other mental disorders in offspring: A prospective-longitudinal community study. *Arch Gen Psychiatry*. 2002;59(4):365-374.

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Rhodes SD, Mann L, Simán FM, et al. The impact of local immigration enforcement policies on the health of immigrant Hispanics/Latinos in the United States. *Am J Public Health* 2015;105:329-337.

Wheeler LA, Updegraff KA, Crouter A. Mexican-Origin Parents' Work Conditions and Adolescents' Adjustment. *Journal of family psychology : JFP : journal of the Division of Family Psychology of the American Psychological Association (Division 43)*. 2015;29(3):447-457. doi:10.1037/fam0000085.

Yoshikawa H, Kalil A. The effects of parental undocumented status on the developmental contexts of young children in immigrant families. *Child Dev Perspect* 2011;5:291-297.

# Exhibit A

# Milken Institute School of Public Health

THE GEORGE WASHINGTON UNIVERSITY

**Kathleen M. Roche**

## Personal Data

Work address:

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Milken Institute School of Public Health  
The George Washington University  
950 New Hampshire Avenue, Suite 300  
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(202) 994-3858 kroche@gwu.edu

## Education and Training

1988 *Bachelor of Arts*, Major: Art History, Emory University.  
1993 *Master of Social Work*, The University of Georgia School of Social Work.  
1999 *Doctor of Philosophy*, Department of Maternal and Child Health,  
Johns Hopkins Bloomberg School of Public Health.

## Professional Experience

07/12 – present *Associate Professor*  
George Washington University,  
Department of Prevention & Community Health, Washington, DC

07/10 – 07/12 *Associate Professor*  
Georgia State University, Department of Sociology, Atlanta, GA

07/07 – 06/10 *Assistant Professor*  
Johns Hopkins Bloomberg School of Public Health,  
Department of Population, Family, and Reproductive Health, Baltimore, MD

*Director of Research, Johns Hopkins Leadership in Adolescent Health  
Training Program* (Bureau of Maternal & Child Health, P.I: H. Adger),  
Johns Hopkins School of Medicine, Baltimore, MD

04/03 – 06/07 *Assistant Scientist*  
Johns Hopkins Bloomberg School of Public Health,  
Department of Population and Family Health Sciences, Baltimore, MD

04/99 – 03/03 *Research Associate*  
Johns Hopkins Bloomberg School of Public Health,  
Department of Population and Family Health Sciences, Baltimore, MD.



10/98 – 03/99 *Research Analyst*  
Johns Hopkins University Center for Adolescent Health Promotion and Disease Prevention, Baltimore, MD. Research design, implementation, data analysis, and production of papers/presentations related to study of neighborhood and family influences on adolescent substance use, delinquency, and aggression.

### Research Grant Participation

**Principal Investigator:** “Linking Community and Family Characteristics to Adolescent Adjustment,” NICHD, National Institutes of Health. September 1, 2017 – August 31, 2022. Total: \$2,687,934 (directs: \$2,037,529).

- Using eight time points of data for a representative sample of 600 Latino parent-youth dyads in an emerging immigrant destination, this study will test an integrative theoretical model specifying the cascade of effects from cultural demands and opportunities in neighborhoods to adolescent externalizing and internalizing problems.

**Co-Investigator:** “Clinical and Translational Science Institute at Children’s National,” NIH, National Center for Advancing Translational Sciences. July 1, 2016 – June 30, 2021. Total: \$22,021,067.

- The primary goal is to provide integrated, cost-effective, investigator-focused resources that overcome research barriers, promote collaborative research, and provide research training with a focus on children’s health. With an emphasis on health disparities and childhood antecedents to adult diseases, CTSI-CN builds upon its pediatric research strengths in areas such as rare diseases, asthma, and neuro-developmental disabilities to collaborate with a national network of 1,200 community health centers.

**Principal Investigator:** “The US Immigrant Political Climate and US Latino Families: A Mixed Methods Study,” Cross-Disciplinary Research Program, The George Washington University. July 1, 2017 – June 30, 2018. \$35,756.

- Exploratory study to identify impacts of immigration policy changes on US Latino parents.

### Past:

**Co-Investigator:** “Evaluation of the D.C. Healthy Schools Act of 2010”(Subcontract PI: O.A. Price). Response to RQ883706, Office of the State Superintendent of Education. October 1, 2015 – September 30, 2016. \$81,402.

To evaluate the D.C. Healthy Schools Act of 2010.

**Principal Investigator:** “Acculturation-Related Parenting Risks for Latino Adolescent Substance Use,” Springboard Grants Program, Milken Institute School of Public Health, The George Washington University. July 1, 2014 – June 30, 2015. \$50,000.

Pilot study used to inform R01 proposal development for application to NIDA, October 2015.

**Co-Investigator** “Prevention at Home: A Model for Novel use of Mobile Technologies and

Integrated Care Systems to Improve HIV Prevention and Care While Lowering Cost,” Centers for Medicare and Medicaid Services. PI: F. Speilberg. September 1, 2014 – December 31, 2015. \$23,808,617.

To utilize mobile technologies and optimize the prevention and care continuum for HIV+ individuals in Washington D.C.

**Co-Investigator:** “Prince Georges County School Health Needs Assessment.” Prince Georges County Public Schools. June 1, 2014 – August 31, 2014. PI: O. Price. \$24,999.

Identify health problems and health care needs of students and staff in Prince Georges county public schools with the aim of improving school health services.

**Co-Investigator:** “Managing Chronic Stress in Urban Minority Youth.” American Public Health Association. June 1, 2014 – September 30, 2014. PI: O. Price. \$25,000.

Phase I of project to assist school-based health center providers in more effectively helping low-income, urban minority youth cope with chronic and multiple daily stressors in an effort to prevent school dropout. This pilot phase of the project will inform Phase II, which will follow to expand the scope of work.

**Principal Investigator:** “Acculturation and youth's longitudinal adjustment in Mexican-American families,” HRSA 09-001 (MCH Research Program, Secondary Analysis). Maternal and Child Health Bureau. February 1, 2010 – January 31, 2012. \$100,000

Examines acculturation effects on adolescent mental health and school attainment for 749 Mexican-origin youth of immigrant parents followed over three time points in adolescence and young adulthood. Using SEM techniques, the study identified 1) bicultural orientations in multiple acculturation domains and 2) effects of a parent-youth acculturation gap on parent-youth conflict and youth adjustment. Data derive from the Children of Immigrants Longitudinal Study.

**Principal Investigator:** “The Latino Youth and Family Study,” Georgia State University Research Initiation Grant. July 1, 2011 – June 31, 2012. \$10,000.

In this mixed-methods pilot study, focus groups are being conducted with Latino/a immigrant parents and adolescents to explore themes pertinent to parent-adolescent relationships and parenting with respect to developmental transitions through adolescence. Subsequent to these, school-based surveys with 120 adolescents and 30 parents of youth are being used to test psychometric properties of parenting measures that have been adapted to be culturally appropriate for Atlanta’s immigrant Latino population. Findings will inform proposal development on the topic of Latino adolescent health and well being.

**Co-Investigator:** “Cultural and contextual variability in parenting impacts on adolescent adjustment”(P.I.: L. Franzini). HRSA 09—001 (MCH Research Program). Maternal and Child Health Bureau. February 1, 2009 – January 31, 2012. \$810,000.

Drawing from theoretical frameworks specific to the development of ethnic minority youth and to neighborhood effects, the present study aims to identify universal, context-specific, and culture-specific parenting values, practices and styles associated with health trajectories from early to late adolescence among low-income, urban Latino and African American youth. The study builds on Healthy Passages, a cohort study of 5<sup>th</sup> graders living in an urban Southwestern city who were interviewed in 5<sup>th</sup> and 7<sup>th</sup> grades. The proposed study will

collect data in 10<sup>th</sup> grade to test hypotheses regarding multi-level pathways to adolescent depressive symptoms, school engagement, and delinquent behaviors.

**Co-Principal Investigator:** “How parenting modifies neighborhood risks related to low-income children’s health,” (P.I: T. Leventhal). Maternal and Child Health Bureau, January 1, 2007 – December 31, 2007 \$100,000.

Multi-level analyses of three time points of data on over 2,000 low-income participants in “Welfare, Children and Families: A Three City Study” will explore modifying influences of parenting on associations between neighborhood context and child health and health-related behaviors. Developmental variations in these associations from early childhood to late adolescence will be considered.

**Co-Principal Investigator:** “Parental influences on adolescent sexual risk,” (PI: R. Blum). Office of Population Affairs, April 1, 2005 – March 31, 2007, \$357,584

Using data from “The National Longitudinal Study of Adolescent Health,” and “Welfare, Children and Families: A Three City Study” this proposed study examines direct and indirect effects of family social processes on youths’ sexual risk behaviors from early adolescence into emerging adulthood.

**Principal Investigator:** “The experience of parenting within a Central American immigrant community,” Faculty Development Award, Department of Population and Family Health Sciences, Johns Hopkins Bloomberg School of Public Health, December 1, 2005 – December 31, 2006, \$20,000.

Through the development of partnerships with community-based organizations, qualitative data from 30 in-depth interviews and two follow-up focus groups with mothers of young Central American immigrant adolescents will be collected and analyzed. The study aims to understand the experience of parenting among Central American immigrant mothers living in a low-income immigrant community.

**Co-Investigator:** “Neighborhood and Family Effects on Adolescent Health Behaviors” (P.I.: C. Alexander), Maternal and Child Health Bureau, 08/30/98 – 07/31/02, \$443,670.

To understand how neighborhood and family social contexts influence adolescent delinquency, aggression, and early sex initiation. The study includes an analysis of national data (The National Longitudinal Study of Adolescent Health) and the collection and analysis of qualitative and quantitative data on families living in three Baltimore City neighborhoods with varying rates of juvenile arrests for violent crimes.

**Principal Investigator:** Johns Hopkins Center for Adolescent Health Development Award, “Neighborhood characteristics and social capital: Influences on the association between parenting and fighting and delinquency among adolescent males,” 1997 – 1998, \$10,000.

Using data from the National Longitudinal Study of Adolescent Health, this study examined how neighborhood attributes and social capital modified associations between parenting and delinquency and aggression among adolescent males.

**Principal Investigator:** Doctoral Dissertation Grant, Johns Hopkins University Center for Injury Research and Policy, 1997 – 1998

**Principal Investigator:** Doctoral Training Fellowship, Johns Hopkins Bloomberg School of Public Health, Department of Maternal and Child Health, 1994 – 1998

## Honors and Awards

Delta Omega, The Public Health Honorary Society, Alpha Chapter.

Child Health Leader, University of Rochester (October 1999, Rochester, NY; October 2001, Chicago, IL). One of 50 early career academics selected for program linking researchers with representatives from government, child advocacy, and national foundations to encourage an interdisciplinary approach to shaping the research and policy agenda for children's health and well being (Director: M. Weitzman).

The Donald A. Cornely Scholarship Award - Johns Hopkins Bloomberg School of Public Health, Department of Maternal and Child Health, 1996 – 1997

## Peer Review Publications (\*graduate student co-author)

1. **Roche, K. M.**, Vaquera, E., White, R. B. M., & Rivera, M. I. (2018). Impacts of immigration actions and news and the psychological distress of U.S. Latino parents raising adolescents. *Journal of Adolescent Health, 62*, 525 – 531.
2. **Roche, K. M.**, Little, T. D., Ghazarian, S. R., Lambert, S. F., Calzada, E. J. & Schulenberg, J. (2018). Parenting processes and adolescent adjustment in immigrant Latino families: The use of residual centering to address the multicollinearity problem. *Journal of Latino/a Psychology*, early view available online February 22.
3. Nair, R., **Roche, K. M.** & White, R. B. M. (2018). Acculturation gap distress among Latino youth: Prospective links to family processes and youth depressive symptoms, alcohol use, and academic performance. *Journal of Youth & Adolescence, 47*, 105-120.
4. Meyer, K. \*, **Roche, K. M.** (2017). Sport-for-development gender equality impacts from basketball program: Shifts in attitudes and stereotyping in Senegalese youth and coaches. *Journal of Sport for Development, 5*, 49 – 57.
5. **Roche, K. M.**, Calzada, E. J., Ghazarian, S. R., Little, T. D., Lambert, S. F. & Schulenberg, J. (2017). Longitudinal pathways to educational attainment for youth in Mexican and Central American immigrant families. *Journal of Latino/a Psychology, 5*, 12 – 26.
6. Bingenheimer, J. B., **Roche, K. M.**, & Blake, S. (2017). Family adult awareness of adolescents' premarital romantic and sexual relationships in Ghana. *Youth & Society, 49*, 341-368.
7. **Roche, K. M.**, Bingenheimer, J. B. & Ghazarian, S. R. (2016). The dynamic interdependence between family support and depressive symptoms among adolescents in Ghana. *International Journal of Public Health. 61*, 487 - 494.
8. Little, T. D., **Roche, K. M.**, Chow, S., Schenck, A. P. & Byam, L. (2016). National Institutes of Health Pathways to Prevention Workshop: Advancing research to prevent youth suicide. *Annals of Internal Medicine, 165*, 795-799.
9. Lambert, S. F., **Roche, K. M.**, Saleem, F. T. & Henry, J. S. (2015). Mother-adolescent relationship quality as a moderator of associations between racial socialization and adolescent psychological adjustment. *American Journal of Orthopsychiatry, 85*, 409 - 420.
10. **Roche, K. M.**, Lambert, S. F., Ghazarian, S. R. & Little, T. D. (2015). Latino youth's language brokering across contexts: Associations with parenting and parent-child relationships in a new immigrant destination area. *Journal of Youth and Adolescence, 44*, 77 – 89.

11. **Roche, K. M.**, Caughy, M. O., Schuster, M. A., Bogart, L. M., Dittus, P. J. & Franzini, L. (2014). Cultural orientations, parental beliefs and practices, and Latino youth's autonomy and independence. *Journal of Youth and Adolescence*, *43*, 1389 – 1403.
12. **Roche, K. M.**, Ghazarian, S. R., Fernandez-Esquer, M. E. (2012). Unpacking acculturation: Cultural orientations and educational attainment among Mexican-origin youth. *Journal of Youth and Adolescence*, *41*, 920 – 931.
13. Murray, K. W., Bair-Merritt, M., **Roche, K. M.** & Cheng, T. (2012). The impact of intimate partner violence on mothers' parenting practices for low-income adolescents. *Journal of Family Violence*, *27*, 573 – 583.
14. **Roche, K. M.** & Ghazarian, S. R. (2012). The value of family routines for the academic success of vulnerable adolescents. *Journal of Family Issues*, *33*, 874 – 897.
15. **Roche, K. M.**, Ghazarian, S. R., Little, T., & Leventhal, T. (2010). Understanding links between punitive discipline and adolescent adjustment: The relevance of context and reciprocal associations. *Journal of Research on Adolescence*, *21*, 448 – 460.
16. Ghazarian, S. R. & **Roche, K. M.** (2010). Social support and low-income, urban mothers: Longitudinal associations with adolescent delinquency. *Journal of Youth & Adolescence*, *39*, 1097 – 1109.
17. **Roche, K. M.** & Leventhal, T. (2009). Beyond neighborhood poverty: Family management, neighborhood disorder, and adolescents' early sexual onset. *Journal of Family Psychology*, *23*, 819 – 827.
18. \*Ries A. V., Voorhees C. C., **Roche K. M.**, Gittelsohn J., Yan A. F., & Astone N. M. (2009). A quantitative examination of park characteristics related to park use and physical activity among urban youth. *Journal of Adolescent Health*, *45*, S64-S70.
19. Mmari, K., **Roche, K. M.**, \*Sudhinaraset, M., & Blum, R. W. (2009). When a parent goes off to war: Understanding impacts on adolescents and their families. *Youth & Society*, *40*, 455 - 475.
20. \*Ries, A.V., Gittelsohn, J., Voorhees, C.C., **Roche, K. M.**, Clifton, K.J., & Astone, N. M. (2008). The environment and urban adolescents' use of recreational facilities for physical activity: A qualitative study. *American Journal of Health Promotion* *23*, 43-50.
21. **Roche, K. M.**, Ahmed, S., & Blum, R. W. (2008). The enduring consequences of parenting for risk behaviors from adolescence into early adulthood. *Social Science and Medicine*, *66*, 2023 - 2034.
22. \*Ries, A.V., Voorhees, C. C., Gittelsohn, J., **Roche, K. M.** & Astone, N. M. (2008). Adolescents' perceptions of environmental influences on physical activity. *American Journal of Health Behavior*, *32*, 26 - 39.
23. Trent, M., Clum, G., & **Roche, K. M.** (2007). Sexual victimization and reproductive health outcomes in urban youth. *Ambulatory Pediatrics*, *7*, 313 - 316.
24. **Roche, K. M.**, Ensminger, M. E., & Cherlin, A. J. (2007). Variations in parenting and adolescent outcomes among African American and Latino families living in low-income, urban areas. *Journal of Family Issues*, *28*, 882 - 909.
25. **Roche, K. M.**, Astone, N. M., & Bishai, D. (2007). Caring for young adolescents during out-of-school hours: Impact on problem behaviors among youth in low-income, urban areas. *Journal of Family and Economic Issues*, *28*, 471 - 488.

26. **Roche, K. M.**, Ensminger, M. E., Ialongo, N., Poduska, J., & Kellam, S. (2006). Early entries into adult roles: Associations with aggressive behavior from adolescence into young adulthood. *Youth & Society*, 38, 236 - 261.
27. **Roche, K. M.**, Mekos, D., Alexander, C. S., Astone, N. M., Bandeen-Roche, K., & Ensminger, M. E. (2005). Parenting influences on early sex initiation among adolescents: How neighborhood matters. *Journal of Family Issues*, 26, 32 - 54.
28. **Roche, K. M.**, Ellen, J., & Astone, N. M. (2005). Effects of out-of-school care on early sex initiation in low-income, central city neighborhoods. *Archives of Pediatrics and Adolescent Medicine*, 159, 68 - 73.
29. **Roche, K. M.**, Ensminger, M. E., Chilcoat, H. & Storr, C. (2003). Establishing independence in low-income urban areas: The relationship to adolescent aggressive behavior. *Journal of Marriage and Family* 65 (3), 668 - 680.
30. **Roche K. M.**, Webster, D., Alexander, C. S., & Ensminger, M. E. (2003). Neighborhood variations in the salience of family support to boys' fighting. *Adolescent and Family Health* 3 (2), 55 - 64.
31. Gittelsohn, J., **Roche, K. M.**, Alexander, C. S., & Tassler, P. (2001). The social context of smoking among African American and White adolescents in Baltimore City. *Ethnicity and Health* 6, 211-225.

#### **Non-peer reviewed reports**

- Biehl, M., Acosta Price, O., Roche, K. M., Spielberg, F. & Bhattacharjee, A. (2014). "Improving School Health and Wellness in Prince George's County Public Schools, Maryland: A Needs Assessment."
- Blum, R., Roche, K. M., & Blum, L. M. (2004). "School connectedness: Effective strategies and promising approaches."
- Georgia Kids Count Fact Book, 1993*. Georgians for Children: Atlanta, GA.
- Georgia Kids Count Fact Book, 1992*. Georgians for Children: Atlanta, GA.

#### **Invited Presentation:**

*Structural Equation Modeling & Theory Testing: An Overview and Application to the Study of Culture and Parenting for Latino Immigrant Families*. Wednesday Noon Seminar Series, February 5, 2014. Johns Hopkins Bloomberg School of Public Health.

#### **Invited Conference Participant:**

"*Cutting the Edge of Research in Adolescent Sexuality: Considering Normative Development PART II Conference*" (April 29 – May 2, 2004, San Francisco, CA). One of 20 researchers invited to participate in a mini-conference sponsored by the Center for Research on Gender and Sexuality at San Francisco State University (Director: Deborah Tolman). This network of researchers is focused on building intellectual and practical bridges among researchers whose diverse work does or should incorporate the study of adolescent sexuality.

#### **Professional Presentations:**

**Roche, K. M.**, Vaquera, E., White, R. B. M., & Rivera, M. I. (2018). Impacts of Anti-immigrant Actions and News on The psychological distress of US Latino Parents Raising Adolescents. Paper to be presented in the Latino/a Youth and Legal Liminality section, Annual Meeting of the American Sociological Association, August 11 – 14, Philadelphia, PA.

**Roche, K. M.**, Lambert, S. F., Little, T. D., Calzada, E. J., & Schulenberg, J. & White, R. M. B. Latent Profile Analysis of Parental Monitoring and Parent-Child Conflict in Latino Immigrant Families: Impacts on Adolescent Adjustment. Poster presentation April 13, 2018 at the Biennial Meeting, Society for Research on Adolescence.

Nair, R. N., **Roche, K. M.**, White, R. B. M. (2017). Acculturative Family Distancing Among Latino Youth: Examining Prospective Links to Family Processes, Depression and Achievement. Poster presentation in the Race, Ethnicity, Culture and Context section, Biennial Meeting, Society for Research on Child Development, April 7.

\*Martinez, D.J., Turner, M.M., **Roche, K.M.**, & Horn, K.A. (2017). What May Be Associated with Young Adult E-Cigarette Use? Examination of Key Correlates. Poster Presentation in the Alcohol, Tobacco, and Other Drugs Section, Student Award Candidate. American Public Health Association (APHA) Annual Meeting & Expo, Atlanta, GA, Nov. 5-8.

**Roche, K. M.**, Ghazarian, S. R., Little, T. D., Lambert, S. F., Calzada, E. J., & Schulenberg, J. (2016). Residual-centered Latent Variables to Address the Multicollinearity Problem in Parenting Research. Session Chair & Paper presented at 2016 Biennial Meeting for Society for Research on Adolescence, Baltimore, MD, Session Title: “Applying Innovative Analytic Methods to Advance Knowledge About Parenting Impacts on Adolescent Adjustment.” March 31 – April 2.

Ghazarian, S. R., **Roche, K. M.**, Caughy, M. O. & Franzini, L. (2014). Cultural Value Differences Among Mexican-American Youth and Parents: Associations With Parent-Youth Conflict and Youth Depression. Paper presentation for the 2014 Society for Research on Child Development Special Topic Meeting: New Conceptualizations in the Study of Parenting-At-Risk. San Diego, CA, Session Title: "Parenting in the Context of Socioeconomic Disadvantage in Mexican American Families Across Developmental Periods" November 13 - 15.

**Roche, K.M.** Session Chair for Specifying Neighborhood Conditions that Matter for Adolescent Mental Health and Well-being. Paper Symposium at the 2014 Society for Research on Adolescence Biennial Meeting, Austin, TX. March 20 – 22.

**Roche, K. M.**, Caughy, M. O., Schuster, M., Bogart, L.M., Wallander, J., Windle, M. & Franzini, L. (2014). Latino Cultural Orientations and Early Adolescent Adjustment: Pathways to Parental Behavioral Control in Middle Adolescence. Poster presentation at the 2014 Society for Research on Adolescence Biennial Meeting, Austin, TX. March 20 – 22.

**Roche, K. M.**, Lambert, S. F., Ghazarian, S. R. (2014). Language Brokering and Parental Behavioral Control among Latino Youth in a New Immigrant Destination Area. Paper presented at the 2014 Society for Research on Adolescence Biennial Meeting, Austin, TX. March 20 – 22.

**Roche, K. M.**, Caughy, M. O., Schuster, M., Bogart, L.M., Davies, S., Dittus, P. J., & Franzini, L. (2012). Cultural Orientations and Latino/a Adolescent Autonomy Development. Chair of session and presenter of paper for the 2012 Society for Research on Adolescence Biennial Meeting, Vancouver, BC, Canada, Session Title: "Understanding Parenting and Adolescent Adjustment in Latino/a Families: How Cultural Orientation Matters" March 8 – 10.

Ghazarian, S. R., **Roche, K. M.**, Caughy, M. O., & Franzini, L. (2012). Measurement invariance for parental autonomy granting constructs among African American, White, and Hispanic families. Poster session at the 2011 SRCD Themed Meeting: Developmental Methodology. Tampa, Florida. February 9 - 11.

**Roche, K. M.**, Caughy, M. O., Schuster, M. A., Bogart, L. M., Davies, S., Dittus, P. J. & Franzini, L. (2011). Cultural Orientations in Latino Families and Maternal Views on Adolescent Autonomy. Paper presented at 73<sup>rd</sup> Annual Conference on Family Relations. Orlando, FL, Session Title: "The Role of Parental Acculturation in the Development of Immigrant Children" November 15 – 19.

**Roche, K. M.** & Ghazarian, S. R. (2010). Acculturation and Mexican-Origin Adolescents' Depressive Symptoms. Paper presented at 72<sup>nd</sup> Annual Conference of the National Conference on Family Relations. Minneapolis, MN, Session Title: "Contexts and Pathways to Well-being: Family Relationships of Latino Youth" November 3 – 6.

Ghazarian, S. R. & **Roche, K. M.** (2010). Social Network Support and Engaged Parenting in Low-income Urban Neighborhoods: Longitudinal Associations with Youth Delinquency. Session Chair & Paper presented at 2010 Biennial Meeting for Society for Research on Adolescence, Philadelphia, PA, Session Title: "Protective Factors that Matter for the Emotional and Behavioral Well-being of Adolescents Faced with Neighborhood Challenges" March 11 – 13.

**Roche, K. M.** & Ghazarian, S. R. (2009). Family routines and adolescent success in the face of urban poverty. Chair and Paper presented at the 71<sup>st</sup> Annual Conference of the National Council on Family Relations. San Francisco, CA, Session Title: "Diversity among Vulnerable Youth: A Look at Positive Outcomes," November 11 - 14.

**Roche, K. M.**, Ghazarian, S. R., Leventhal, T., & Little, T. (2008). Reciprocity in parenting and adolescent adjustment within poor urban neighborhoods. Poster presented at the 70<sup>th</sup> Annual Conference of the National Council on Family Relations. Little Rock, AR, November 5 – 8.

\*Martinez, C. & **Roche, K. M.** (2008). Acculturation and marijuana use: Structural influence of friendship networks on Mexican American youth. Paper presented at 136<sup>th</sup> American Public Health Association Annual Meeting. Session Title: "Immigration, Stress and Substance Use Among Latinos." San Diego, CA, October 25 – 29.

**Roche, K.M.** & Leventhal, T. (2008). Parenting in the face of neighborhood risk: Impacts on adolescent problem behavior. Paper presented at the Society for Research on Adolescence



Biennial Meeting. Session Title: “How and When Neighborhoods Matter: Toward an Understanding of Adolescent Problem Behavior.” Chicago, IL, March 6 – 9.

\*Ries, A.V., Gittelsohn, J., Voorhees, C.C., **Roche, K.**, Clifton, K.J., & Astone, N. (2008) “Environmental factors impacting African American adolescents’ use of recreational facilities: A qualitative study.” Paper presented at the Robert Wood Johnson Active Living Research Conference. Washington, DC. April 9-12, 2008.

**Roche, K.M.** & Leventhal, T. (2007). Parenting and early adolescent sex: Why neighborhood risk matters. Session Co-Chair and paper at the 69<sup>th</sup> National Council on Family Relations Annual Conference, Session Title: “Vulnerable Families: Parenting Adolescents and Neighborhood Risk.” Pittsburgh, PA, November 7 - 10.

**Roche, K. M.**, Ahmed, S. & Blum, R.W. (2006). Parenting’s enduring consequences from early adolescence into young adulthood. Paper presentation at the 68<sup>th</sup> National Council on Family Relations Annual Conference, Session Title: “Parents and Adolescents,” Research & Theory Section, Minneapolis, MN, November 8 – 11.

**Roche, K. M.**, Ensminger, M. E., & Cherlin, A. J. (2006). Parenting and adolescent outcomes among low-income, urban racial/ethnic minority families. Session Chair & paper presentation at the 2006 Biennial Meeting for the Society for Research on Adolescence, San Francisco, CA, Session Title: “Variations in Parenting Across Race, Ethnicity and Culture.” March 23 – 26.

\*Ries, A.V., Voorhees, C. C., Alexander, C., Gittelsohn, J. & **Roche, K. M.** (2006). “Environmental influences on the use of recreation centers and parks for physical activity among African American adolescents,” Paper presentation at the Robert Wood Johnson Foundation: Active Living Research Annual Conference, San Diego, CA, February 16 – 18.

**Roche, K. M.**, Ensminger, M. E., & Cherlin, A. J. (2005). Neighborhood variations in parenting influences on African American youth. Paper presented at the 67<sup>th</sup> National Council on Family Relations Annual Conference, Session Title: “Parenting,” Ethnic Minorities & Family Research & Theory Sections, Phoenix, AZ, November 16 – 20.

**Roche, K. M.**, Mekos, D., Alexander, C. S., & Astone, N. M. (2005). “The simultaneous influences of neighborhoods and parenting on young adolescents’ initiation of sex.” Paper presented at the 2005 Society for Research on Child Development Biennial Meeting. Symposium title: “The Intersection of Neighborhood and Family Influences: Implications for Youth from Four Longitudinal Studies,” Atlanta, GA, April 7 - 10.

**Roche, K. M.**, Astone, N. M., & Bishai, D. (2004). “Out-of-school care in poor urban areas: Effects on adolescent behavior.” Paper presented at the 66<sup>th</sup> National Council on Family Relations Annual Conference, Session Title: “Transitions in the Lives of Low-Income Families,” Family Policy Section, Orlando, FL, November 17 – 20.

Trent, M., Clum, G., Poduska, J., Kellam, S., & **Roche, K. M.** (2005). “Effect of sexual victimization on reproductive health outcomes in young adults from segregated urban

communities.” Paper presented at the 2005 Society for Adolescent Medicine Annual Meeting, Los Angeles, CA, March 30 – April 2.

**Roche, K. M.**, Jones, A. S., Alexander, C. S., & Sugland, B. (2002). “When families differ from their neighbors: Influences on adolescent heavy alcohol use.” Poster presented at the 9<sup>th</sup> Biennial Meeting of the Society for Research on Adolescence, New Orleans, LA, April 11-14.

Alexander, C. S., **Roche, K. M.**, Bandeen-Roche, K., & Ensminger, M. E. (2002). “Gender differences in neighborhood and family predictors of early sexual intercourse.” Poster presented at the 9<sup>th</sup> Biennial Meeting of the Society for Research on Adolescence, New Orleans, LA, April 11-14.

**Roche, K. M.**, Webster, D., Alexander, C. S., & Ensminger, M. E. (1999). “Neighborhood effects on the association between parenting and adolescent fighting.” Paper presented at the 1999 Annual Meeting of the American Sociological Association, Regular Session on Sociology of Children and Youth, Chicago, IL, August 6-10.

**Roche, K. M.** & Alexander, C. S. (1998). “Family and neighborhood social processes: Influences on adolescent violence.” Paper presented at the 126<sup>th</sup> Annual Meeting of the American Public Health Association, Session title: “Assessing Adolescent Health Issues,” Washington, D.C., November 15-18.

## **University Service**

### **The George Washington University**

#### *The George Washington University*

Advisory to the Office of the Vice President of Research	2016-17
Senate Research Committee	2016-present

#### *Milken Institute School of Public Health*

Research Committee	2013-16
Conflict of Interest Committee	2015-present

#### *Department of Prevention & Community Health*

Research Committee	2013-17
Awards Committee	2015-17
Faculty Search Committee	2014-15; 2017-18
Doctoral Advisory Committee	2017 – present

#### *Center Affiliation*

Associate, Center on Health and Healthcare in Schools	2013 – present
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### **Georgia State University**

#### *Department of Sociology*

Chair, Faculty Search Committee	2011 – 2012
Faculty Search Committee	2010 – 2011
SOCIOPATH – Department newsletter	2011 – 2012

Outreach Committee 2011 – 2012

*Center Affiliation*

GSU Partnership on Urban Health Research 2010 – 2012

Emory University Center on Injury Control 2010 – 2012

**The Johns Hopkins University**

*Bloomberg School of Public Health*

Committee on Equity, Diversity, and Civility 2006 – 2009

Student Diversity Advisory Board 2009 – 2010

*Department of Population, Family, and Reproductive Health*

Family and Health Working Group 2006 – 2009

Admissions Committee 2009 - 2010

Doctoral Committee 2009 – 2010

Awards Committee 2007 – 2008

Chair, Working Group on Families and Health 2006 - 2007

Director, Masters in Health Science Program 2005 – 2007

Committee on Academic Standards 2006 - 2007

Child Health and Development Track 2000-present

*Center Affiliation*

Population Center 2004 - 2010

Center for Adolescent Health 1998 – 2006

Center for the Prevention of Youth Violence 2001 – 2006

**Professional Activities**

**National Service**

Rueben Hill Awards Committee 2008 – 2010 National Council on Family Relations

Social Policy Awards Committee 2011 - 2014 Society for Research on Adolescence

Publications Committee 2014 – present Society for Research on Adolescence

**Society Memberships**

Society for Research on Adolescence

Society for Research on Child Development

National Council on Family Relations

**Community Affiliation**

- Co-Lead. Community Engagement Module, CTSI-CN (2016-present), a GWU-Children's Hospital partnership aimed at addressing improving the health of children in the DC metro area
- Center for Trauma and the Community: Family Trauma Research Group (2014 – 2016), a research collaborative based in the Department of Psychiatry at the Georgetown University Medical School aimed at using a family approach to addressing child and family trauma.
- Action Langley Park (2007 – 2009) a non-profit organization focused on improving the well being of primarily Central American immigrants living in Langley Park, Maryland.

- Baltimore City Data Collaborative (2005 – 2007), a collaborative aimed at developing neighborhood-level indicators useful for the evaluation of campaign to improve the health and safety of children in Baltimore City.

## Professional Service

### NIH Peer Review Group / Study Section

10/2018                    **Regular Member**, NIH Psychosocial Development, Risk and Prevention (PDRP) Study Section (July 2018 - June 2022)

### Ad hoc reviewer

06/2018    NIH PDRP Study Section, Chicago, IL  
 06/2017    NIH Special Emphasis Review Panel, teleconference  
 10/2017    NIH PDRP Study Section, Washington, DC  
 06/2017    NIH PDRP Study Section, Orlando, FL  
 02/2017    NIH PDRP Study Section, Washington, DC

### Journal Service:

#### Editorial Board

2015 – present            *Applied Developmental Science*  
 2015 – present            *Adolescent Research Review*  
 2013 – present            *Journal of Family Psychology*  
 2013 – present            *Journal of Youth & Adolescence*  
 2011 – present            *Journal of Family Theory and Review*  
 2010 – present            *Journal of Research on Adolescence*  
 2007 – present            *Journal of Marriage and Family*

#### Reviewer

<i>Journal of the American Medical Association</i>	<i>Family Relations</i>
<i>American Journal of Public Health Association</i>	<i>Social Forces</i>
<i>Child Development</i>	<i>Social Science and Medicine</i>
<i>Demography</i>	<i>Youth &amp; Society</i>
<i>Cultural Diversity &amp; Ethnic Minority Psychol.</i>	<i>Journal of Early Adolescence</i>
<i>Journal of Family Issues</i>	<i>Archives of Pediatrics &amp; Adolescent Medicine</i>
<i>Journal of Family and Economic Issues</i>	<i>Journal of Research in Crime &amp; Delinquency</i>

### External Activities/Partnerships

NIH Workshop Panel, “Pathways to Prevention” workshop advancing research to prevent suicide in youth; Office of Disease Prevention in the Office of the Director, the National Institute on Mental Health, the National Institute on Drug Abuse, and the National Center for Complementary and Integrative Health at the National Institutes of Health, March 29 – 31, 2016.

## Teaching Portfolio

### The George Washington University

#### *Advisees*

<u>MPH Candidate</u>	<u>Year</u>		
Karin Bleeg	2012	Samantha Griffin	2014- 2015
Jessica Bress	2012	Alexis Hall	2014-2015
Margaret Dudley	2012	Semira Kassahun	2014- 2015
Vanessa Frontiero	2012	Roushanac Partovi	2014-present
Bo Ra Joo	2012	Lauren Niles	2014-2015
Devon MacKenzie	2012	Laura Liles	2014-2015
Ashley Oberndorfer	2012	Denerica Curry	2014-2015
Kyonna Moore	2012-14	Alexi McHugh	2015
Sarah Oravec	2012-13	Kiran Edelstein	2015-2017
Kristen Wehling	2012-14	Kathleen Murphy	2015–2017
Allison Power	2013-2015	Celeste Gee	2015-2017
Katherine Meyer	2013-present	Valerie Echeveste	2015-present
Carley Thompson	2012-14	Ashley John	2015-present
Darien Mather	2014-2015	Shawn Orenstein	2016-present
Brittany Monks	2014-2015	Zareena Kahn	2017-present
John Fallon	2014-2015	Jaclyn Leiser	2017-present
Eileen Doty	2013-14	Hannah Rothman	2018-present
Brittany Perrotte	2014-present	Amanda Kimball	2017-present
Kendal Harris Garcia	2013-2015	Ranjana Kodwani	2016-present
Shahina Akter	2013- 2015	Megan Lucas	2017-present
Veronique Hionis	2014- 2015	Jaclyn Leiser	2017-present
Katherine Meyer	2014- present		
Massomeh Nicoravan	2014- 2015		

<u>DrPh Candidate</u>	<u>Year</u>
Amy Gedal Douglass	2012-2015

#### *Advisor for Culminating Experience, MPH*

Marisa Cordon “Gender differences in how immigration changes are affecting US Latino parents” 2018

Camilo Alfonso “A cross-sectional study on depression and risk factors for depression among at-risk Latino youth” 2018

Rachel Picard “Policies and procedures for obstetric emergencies” 2018

Katie Meyer “Sports for Development Gender Equality Impacts from Basketball Program: Shifts in Attitudes and Stereotyping in Senegalese Youth and Coaches” 2016

Roushanac Partovi “Immigrant Parent Stress and Latino Adolescent Depressive Symptoms” 2016

Carley Thompson “Parenting Factors and Reproductive Health among Adolescent Girls in Ghana” 2014

Kyonna Moore “Maternal Mental Health Disorders and Neonatal Birth Outcomes” 2014

Aly Brennan, “The Role of the Father in Early Childhood Mental Health” 2014

Kristen Wheling, “Parental Engagement and Sexual Risk Taking Among Low-Income and Urban Adolescents: A Secondary Analysis of the Three City Study” 2014

Devon MacKenzie “Promoting Postpartum Family Planning at the Health Facility Level: Assessment of Jhpiego/MCHIP Country Achievements in Postpartum IUD (PPIUD) 2013 Service Delivery and Secondary Analysis of Factors Associated with PPIUD Satisfaction and Removal in India”

Karin Bleeg “The characteristics of women seeking funding from the DC Abortion Fund” 2013

#### *Preliminary Oral Dissertation Defense*

Amy Gedal Douglass, Department of Prevention & Community Health, DrPh Candidate 2014  
Thesis: “Promoting Positive Child Outcomes through Parents: Direct and Indirect Effects of the Early Head Start Program”

#### *Final Oral Dissertation Defense*

Jessica Henry, Department of Psychology, PhD Candidate 2014

Thesis: “Parental racial socialization and adolescent well-being”

Diane Martinez, Department of Prevention & Community Health, DrPH Candidate, 2016.

Thesis: “An Examination of Internal and External Factors Associated with Young Adult Electronic Cigarette Use and Potential Moderation by User Types”

Amy Gedal Douglass, Department of Prevention & Community Health, DrPh Candidate, 2015.

Thesis: “Promoting Positive Child Outcomes through Parents: Direct and Indirect Effects of the Early Head Start Program”

Ana Maria del Rio Gonzales, Department of Psychology, PhD Candidate 2015

Thesis: “Sexual Risk Behaviors Among Rural Youth in Colombia: An Application of the Integrative Model with Emphasis on Social Norms”

Lyzaida Rivera, Department of Psychology, PhD Candidate 2016

Thesis: “Defining the Paternal Role and Understanding the Effects of Paternal Role Consensus and Maternal Gatekeeping on Father Involvement in Non-cohabiting African American and Hispanic Adolescent Parents”

Kate Leiberman, Department of Psychology, PhD Candidate 2018

Thesis: “Preventing Perinatal Depression in African American Adolescents”

#### *Classroom Instruction*

Practical Data Analysis - <i>MPH@GW</i>	(12 section)	2018, Spring II
	(12 section)	2017, Fall
	(12 section)	2016, Fall
	(12 section)	2016, Spring II
	(12 section)	2015, Fall
	(10 section)	2015, Spring II
Social & Behavioral Science Research Methods	(4 section)	2014, Fall
	(22)	2018, Spring
	(14)	2016, Spring

	(10)	2015, Spring
Culminating Experience Part I & II - <i>MPH@GW</i>	(10 section)	2016, Summer - Fall
	(10 section)	2015, Spring I - Spring II
Child Development & Public Health	(10, section)	2015-16, Fall - Spring
	(9)	2014, Fall
	(19)	2012, Fall
	(20)	2013, Fall
Social & Behavioral Approaches to Public Health	(33)	2013, Spring
	(85)	2013, Summer
Social Ecology of Child & Adolescent Health	(10)	2014, Spring

### *Guest Lectures*

Introduction to Maternal and Child Health:		
“Adolescent Development”		2013 – 2015
“Social Contexts of Adolescent Health”		2017
Promotion of Mental Health:		
“Adolescent Mental Health”		2013 - 2014
Adolescent Health:		
“Social Ecology of Adolescent Health”		2013 - 2014
Doctoral Research Methods III:		
“Missing Data: Introduction & Overview”		2013
Doctoral Seminar - Foundations		
“Social & Behavioral Determinants of Health”		2014, 2016

### **Georgia State University**

#### *Preliminary Oral Defense*

Jessica Thomason, Community Psychology PhD Candidate 2011		
“A mixed-methods approach to evaluating the delivery of sexuality education in a youth development context”		
Kelsey Schwartz, MA Sociology Candidate 2011		
“Parent-teen sex communication and acculturation among Latino Families”		

#### *Final Oral Defense*

Jessica Thomason, Community Psychology PhD Candidate 2013		
“An evaluation of the delivery of sexuality education in a youth development context”		
Kelsey Schwartz, MA Sociology Candidate 2011		
“Parent-teen sex communication and acculturation among Latino Families”		

#### *Classroom Instruction*

Social Research Methods, Sociology	(25)	2011, Spring & Fall
	(25)	2012, Spring

## **Johns Hopkins Bloomberg School of Public Health**

### *Advisees*

#### MPH/MHS candidate

Tiffany Riser	2009
Frances Hsieh	2008
Jessica R. Carda	2008 - 09
Jessica Donaldson	2006 - 07
Kristen Smith	2006 - 08

#### PhD candidate

Craig Martinez	2004 –09
Neetu John	2009
Katherine Vassos	2006

#### Postdoctoral fellow

Sharon R. Ghazarian	2008 - 10
PhD - Department of Human Development & Family Studies, University of North Carolina, Greensboro.	
Shalon Irving	2009 - 11
PhD – Department of Sociology, Purdue University, Purdue, Illinois	

### *Advisor for Capstone Project, MPH*

Frances Hsieh, “Enhancing HPV vaccination for adolescents in the US,” 2010  
 Finbar Foley, “Maternal Stress Impacts on BMI among Low-Income Children,” 2009  
 Tara Loyd, “An Unprecedented Loss of Parents: The impact of HIV/AIDS on vulnerable children, families, and communities in rural Lesotho,” 2008  
 Kristen Smith, “Buffalo Public School District Wellness Policy Proposal,” 2008  
 Jessica Carda, “Prevention of Teen Dating Violence Victimization: Bridging the Gap between Research and Policy,” 2009

### *Preliminary Oral Defense*

Nanlesta Pilgrim, PhD Candidate 2009  
 “The Effects of Family Environment on Sexual Vulnerability & HIV Sexual Risk Behavior on Ugandan Females, ages 15-19”  
 Katherine Vassos, PhD Candidate 2008  
 “Understanding Young Women’s Sexual Relationships and Perceived Risk of HIV in Northern Namibia”  
 Renata Hilson, PhD Candidate 2008  
 “Neighborhood hazards and depression and anxiety symptoms among older adults in Baltimore City”  
 Beth Marshall, DrPh Candidate 2008  
 “Turning the Corner Achievement Program evaluation proposal”  
 Keri L. Jowers, PhD Candidate 2008  
 “Examining familial risk for the development of aggressive behavior during childhood”  
 Craig Martinez, PhD Candidate 2007



“Acculturation, gender and friend networks: Alcohol use among Mexican American youth”

Lydia Isaac, PhD Candidate 2007

“What is the effect of the social and physical environment on racial and socioeconomic disparities in cardiovascular disease risk?”

Amy Vastine Reis, PhD Candidate 2005

“Environmental influences on physical activity among urban African American youth”

Jessica Miller Rath, PhD Candidate 2004

“What does parental academic involvement have to do with adolescent health?”

Richelle deMayo, PhD Candidate 2004

“Adolescent health literacy assessment”

Gwendolyn Bergen, PhD Candidate 2004

“How do zero tolerance laws act to lower adolescent driving after drinking?”

JoAnn Binko, PhD Candidate 2003

“Behavior change during adolescence: Toward a new understanding of adolescent girls”

Anita Chandra, DrPh Candidate 2003

"Exploring factors that influence adolescent mental health service use: The youth perspective"

Neil Maniar, PhD Candidate 2002

“Determinants of weapon use among high school students in the U.S.”

### *Final Oral Defense*

Sophia Y. Lo, PhD Candidate 2010

Thesis: “Neighborhood environment, residential mobility, and health: A longitudinal examination of individual and neighborhood factors”

Sarah Renee Lindstrom Johnson, PhD Candidate 2009

Thesis: “Using concept mapping to structure students’ views of the school environment’s contribution to school violence: Providing suggestions for school environment intervention”

Lydia A. Isaac, PhD Candidate 2009

Thesis: “The neighborhood physical environment and cardiovascular disease risk factors: Implications for policy”

Craig Martinez, DrPh Candidate 2009

Thesis: “Acculturation, gender and friend networks: Alcohol use among Mexican American youth”

Andrea Leigh Stone, PhD Candidate 2005

Thesis: “Parental functioning and adolescent marijuana involvement”

Elizabeth Costendater, PhD Candidate 2002

"The dynamics of injection drug users' social networks in Baltimore"

### *Classroom Instruction*

Social Ecology of Adolescent Health	(5-21)	2000 – 10
Child Health and Development Doctoral Seminar	(4)	2008 – 10
Growth and Development III: Adolescence	(24)	2004
Introduction to Maternal and Child Health	(35)	2003

# Exhibit B



Original article

## Impacts of Immigration Actions and News and the Psychological Distress of U.S. Latino Parents Raising Adolescents



Kathleen M. Roche, M.S.W., Ph.D.<sup>a,\*</sup>, Elizabeth Vaquera, Ph.D.<sup>b</sup>, Rebecca M.B. White, Ph.D., M.P.H.<sup>c</sup>, and Maria Ivonne Rivera, M.P.H.<sup>d</sup>

<sup>a</sup> Department of Prevention & Community Health, Milken Institute School of Public Health, The George Washington University, Washington, District of Columbia

<sup>b</sup> Department of Sociology and Department of Public Policy & Public Administration, The George Washington University, Washington, District of Columbia

<sup>c</sup> T. Denny Sanford School of Social and Family Dynamics, Arizona State University, Tempe, Arizona

<sup>d</sup> The Rivera Group, Washington, District of Columbia

*Article history:* Received December 27, 2017; Accepted January 29, 2018

*Keywords:* Immigration; Latino Families; Parent Psychological Distress; Adolescents

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**See Related Editorial on p. 505**

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### A B S T R A C T

**Purpose:** U.S. Latino parents of adolescents face unprecedented threats to family stability and well-being due to rapid and far-reaching transformations in U.S. immigration policy.

**Methods:** Two hundred thirteen Latino parents of adolescents were recruited from community settings in a suburb of a large mid-Atlantic city to complete surveys assessing parents' psychological distress and responses to immigration actions and news. Univariate and bivariate analyses were conducted to describe the prevalence of parents' responses to immigration news and actions across diverse residency statuses. Multiple logistic regression models examined associations between immigration-related impacts and the odds of a parent's high psychological distress.

**Results:** Permanent residents, temporary protected status, and undocumented parents reported significantly more negative immigration impacts on psychological states than U.S. citizens. Parents reporting frequent negative immigration-related impacts had a significantly higher likelihood of high psychological distress than did other parents, and these associations were maintained even when accounting for parents' residency status, gender, education, and experience with deportation or detention. The odds of a parent reporting high psychological distress due to negative immigration impacts ranged from 2.2 ( $p < .05$ ) to 10.4 ( $p < .001$ ).

**Conclusions:** This is one of the first empirical accounts of how recent immigration policy changes and news have impacted the lives of Latino families raising adolescent children. Harmful impacts were manifest across a range of parent concerns and behaviors and are strong correlates of psychological distress. Findings suggest a need to consider pathways to citizenship for Latina/o parents so that these parents, many of whom are legal residents, may effectively care for their children.

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### IMPLICATIONS AND CONTRIBUTION

In response to rapid and unprecedented changes in immigration actions and news, high proportions of U.S. Latino parents of adolescents reported recently having modified behaviors and experiencing worry. Adverse responses to immigration events were associated with more than 300% greater odds of a U.S. Latino parent's high psychological distress.

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**Author contributions:** K.M.R. conceptualized and designed the study, conducted analyses, drafted the initial manuscript, and approved the final manuscript. E.V. conceptualized and designed the study, contributed to writing all manuscript sections, reviewed and revised the manuscript, and approved the final manuscript. R.M.B.W. conceptualized and carried out measurement work for immigration-related impacts, critically reviewed the survey instrument, contributed to writing some manuscript sections, reviewed and revised the manuscript, and approved the final manuscript. M.I.R. supervised and collected data, reviewed and revised the manuscript, and approved the final manuscript.

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Media reports indicate that U.S. Latina/o immigrants have experienced heightened stress and threats to family stability since the new President took office in 2017 [1,2]. However, little empirical data document how rapid changes in immigration news and actions are affecting Latina/o (hereafter, referred to as Latino) families. Adverse consequences of today's immigration climate may be pronounced for Latino parents with adolescent children. Compared with younger children, adolescents have a better cognitive understanding of the stressors their families face, experience more direct exposure to extrafamilial risks, and have spent more formative years of identity development within a U.S. context [3]. The present study describes parents' behavioral and emotional responses to recent immigration actions and news and investigates how these responses are associated with Latino parents' psychological distress. We describe how immigration-related impacts vary by residency status, conceptualized along a hierarchy from the most to least secure categories [4]. Participants included those who were U.S.-born and naturalized U.S. citizens (most secure), permanent residents, Temporary Protected Status (TPS)<sup>1</sup> residents, and undocumented residents (least secure).

Extensive research has described stressors experienced by U.S. Latinos [5,6], particularly the undocumented [7–14]. Latino immigrants often experience fear of deportation, exploitation by employers [8], trauma [15], distrust in public services [16], language barriers, racism [11], and financial strain [17]. These stressors are important predictors of psychological distress, indicated by anxiety, depression, and somatization [12,18,19]. The costs and burdens of psychological distress extend far beyond an affected individual. Parents' psychological distress is especially important; adolescents whose parents are depressed and/or anxious face heightened risk of poor social functioning [20], academic failure [21], and mental health problems [20].

Immigration threats have impacts well beyond the acute harm conferred to the subset of Latinos directly experiencing events such as deportation [13,22]. Informed by public health's injury pyramid, Dreby suggested that an event such as deportation severely hurts those at the top of the pyramid—Latinos experiencing deportation—but also produces less severe harm for a large number of Latinos at the bottom of the pyramid—those not directly experiencing deportation [23]. This is because politics, threats of deportation, and anti-immigrant sentiments lead to widespread fear and anxiety among Latinos not directly affected by the event [10,23,24].

Immigration actions and news likely are affecting Latino parents across diverse residency statuses. The most notable immigration policy changes in 2017 were: (1) expanded eligibility for deportation, which increased deportation of long-term residents without criminal records [25]; (2) the elimination of, and/or plans to eliminate, TPS [26–28]; and (3) an end to the Deferred

Action for Childhood Arrivals (DACA) program, which has protected hundreds of thousands of undocumented Latinos brought to the United States as children [29]. Our study provides some of the first evidence to date indicating how U.S. Latino parents of adolescents cope, react, and manage emotions in response to recent immigration news and actions. Given that the adolescents of parents in this study were U.S. citizens or brought to the United States as children, our research can advance knowledge about the family context for a large and critical segment of the U.S. population.

## Methods

### Procedures and sample

Drawing from a mixed-method study conducted in the fall of 2017, we analyzed survey data for 213 Latina/o immigrant parents living in a suburban area of a large mid-Atlantic city in the United States. Numerous immigration policy changes took place before, during, and immediately after our collection.<sup>2</sup> The community includes a large Latino population, mostly from El Salvador and Guatemala and, to a lesser extent, from Mexico, Honduras, Nicaragua, and the Dominican Republic. An author of this study with expertise in data collection among this community utilized her existing network to recruit participants. Survey-only respondents were provided \$10 and those who also participated in the focus group were provided \$50. Eligibility was limited to Latino parents with at least one child aged 12–18 years. The sample was stratified so that about one-third were undocumented ( $n = 69$ ), one-third were permanent residents ( $n = 70$ ), and the remaining one-third included the same number of U.S. citizen ( $n = 37$ ) and TPS parents ( $n = 37$ ).

Data collection was conducted in Spanish by bicultural and bilingual interviewers. To protect participants' safety, we collected data anonymously, obtained oral consent only, and obtained a Certificate of Confidentiality from the National Institutes of Health. All study procedures were approved by the Institutional Review Board at the institution where the research was conducted.

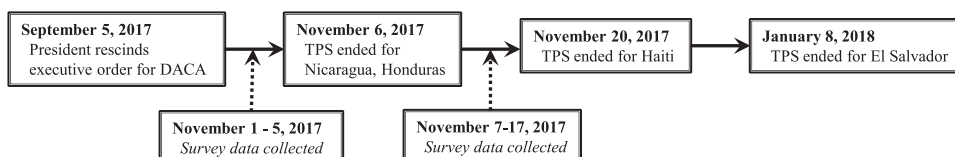
### Measures

**Residency status.** Parents' residency status was measured by four dummy coded variables for U.S. citizen (the reference group), permanent resident, TPS, and undocumented.

**Immigration impacts on parents.** The 15-item Political Climate Scale was used to assess impacts of immigration news and actions [30]. The instrument opens with: "As you know, there have been stories in the news about immigrants and immigration, and there have

<sup>1</sup> TPS residents refer to those granted permission to live in the United States due to extraordinary and temporary conditions in the country of origin [26].

<sup>2</sup> Timeline of survey data collection and policy announcements:



been official actions affecting immigrants and other people. We would like to know whether these news stories and official actions have affected you or your family over the past few months.” Parents responded to 15 statements indicating worry or behavior modification. The original 1 to 5 response options were recorded into “never/almost never, not very often, or sometimes” (the reference group) versus “very often or always/almost always.”

**Parent’s psychological distress.** A modified 16-item version of the Brief Symptom Inventory-18 [31] was used to assess parents’ symptoms of depression, anxiety, and somatization (due to Institutional Review Board concerns, two items—suicidal thoughts and chest pains—were removed). Parents reported being distressed or bothered in the past seven days by things such as feeling worthless, lonely, and nervous (0 = “not at all” to 4 = “extremely”). Results from Principal Components Analysis indicated a single factor of psychological distress ( $\alpha = .96$ ). We recoded the summed average scores into a dichotomous variable, whereby, “high distress” represented the top quartile of scores ( $\geq 3.19$ ).

**Background variables.** Parent characteristics included sex (female was the referent); having at least a high school education (less than high school was the referent); living in the United States for more than 15 years ( $\leq 15$  was the referent); and being from El Salvador (referent group), Guatemala, Honduras, Mexico, United States, or “Other.” We assessed if parents moved to the United States for any of the following reasons: (1) get a better job or make more money; (2) improve education for their child; (3) escape gangs or violence; and/or (4) reunite with family in the United States. Finally, we assessed whether or not the parent had a family member who was deported or detained since the new U.S. President took office in January 2017.

**Analyses.** We ran cross-tabulations with chi-square tests to examine residency status differences in background variables and impacts of immigration actions and news. We then ran logistic regression models whereby parents’ psychological distress was regressed on variables measuring impacts of immigration actions and news. We excluded background measures that bivariate results suggested might pose a multicollinearity problem. We report regression coefficients as unadjusted odds ratios and adjusted odds ratios (AORs), with 95% confidence intervals (CIs). In post hoc analyses, we used two-way interaction terms to examine the degree to which immigration-related impacts on psychological distress differed for Latino parents in marginalized residency status groups (i.e., undocumented, TPS) versus others (i.e., U.S. citizens, permanent residents). All analyses used two-tailed statistical tests.

## Results

Participants included slightly more mothers than fathers. About half of the parents were El Salvadoran, with the remainder including mostly Central Americans and a small number of Mexicans and U.S.-born parents. As shown in Table 1, virtually all TPS and U.S. citizen parents had lived in the United States for more than 15 years, compared with less than two-thirds of permanent resident and less than one-third of undocumented parents. Over three-quarters of U.S. citizens had at least a high school degree, compared with 40% to 50% of permanent resident and undocumented parents, and less than one-fifth of TPS parents. Although 60% of TPS parents reported that a family member had been detained or deported since the new president took office in 2017, less than a quarter of undocumented, permanent resident, and U.S. Citizen parents reported a family member’s recent deportation or detention. Finally, the majority of youth whose parents

**Table 1**  
Distribution of sample characteristics by parents’ residency status, n = 213

	Undocumented	TPS	Resident	U.S. citizen	Total	Chi-square (df)
	n (%)	n (%)	n (%)	n (%)	n (%)	test
Country of origin						
El Salvador	–	–	–	–	117 (55.2)	–
Guatemala	–	–	–	–	25 (11.8)	–
Honduras	–	–	–	–	20 (9.4)	–
Mexico	–	–	–	–	17 (8.0)	–
United States	–	–	–	–	13 (6.1)	–
Other	–	–	–	–	20 (9.3)	–
Live in United States > 15 Years <sup>a</sup>	21 (30.9) <sup>†</sup>	35 (97.2) <sup>‡</sup>	45 (64.3) <sup>§</sup>	36 (97.3) <sup>‡</sup>	137 (64.9)	$\chi^2(3) = 68.14^{***}$
≥ High School Education <sup>b</sup>	34 (49.3) <sup>†</sup>	7 (18.9) <sup>§</sup>	27 (38.6) <sup>†</sup>	29 (78.4) <sup>‡</sup>	97 (45.5)	$\chi^2(3) = 28.42^{***}$
Have DACA-eligible child <sup>c</sup>	27 (39.1)	9 (24.3)	17 (24.3)	–	53 (30.1)	$\chi^2(2) = 4.39$
Fam mem deported/detained <sup>d</sup>	16 (23.5) <sup>†</sup>	22 (59.5) <sup>‡</sup>	17 (24.6) <sup>†</sup>	7 (18.9) <sup>†</sup>	62 (29.4)	$\chi^2(3) = 19.95^{***}$
Reason(s) moved to United States <sup>e</sup>						
Get a job or a better job	12 (17.4) <sup>†</sup>	15 (41.7) <sup>‡</sup>	12 (17.9) <sup>†</sup>	–	39 (22.7)	$\chi^2(2) = 9.37^{**}$
Better education for child	26 (37.7)	18 (48.6)	23 (34.3)	–	67 (38.7)	$\chi^2(2) = 2.11$
Escape gangs or violence	37 (53.6)	24 (64.9)	33 (49.3)	–	94 (54.3)	$\chi^2(2) = 2.37$
Reunite family in United States	16 (23.2) <sup>†</sup>	10 (27.0) <sup>†,‡</sup>	29 (43.3) <sup>‡</sup>	–	55 (31.8)	$\chi^2(2) = 6.82^*$
High psychological distress	16 (23.2) <sup>‡</sup>	18 (48.6) <sup>†</sup>	19 (27.1) <sup>‡</sup>	3 (8.1) <sup>§</sup>	56 (26.3)	$\chi^2(3) = 16.23^{***}$

–” Indicates cell size was too small for cross-tabulation.

Some categories do not add up to 213 due to item-level missing data.

<sup>a</sup> Includes n = 13 parents born in the United States. Reference group: Lived in United States < 15 years.

<sup>b</sup> Reference group: Parent had less than a high school education.

<sup>c</sup> Parent reports having an undocumented child brought to United States prior to age 18. Among parents with “DACA-eligible” child, n = 14 (26.4%) report that their child has protection under the DACA program.

<sup>d</sup> “Fam” = Family; “Mem” = member. Reference group: Had not had family member who was deported or detained since new U.S. president took office January 2017.

<sup>e</sup> Analyses excluded U.S. Citizens due to small numbers having been born outside United States; respondents may mark more than one reason.

\*  $p < .05$  \*\*  $p < .01$  \*\*\*  $p < .001$ .

†,‡,§ Proportions in the same row that do not share superscripts differ at  $p < .05$  using Chi-square tests of significance.

are in this study are U.S. citizens; just 30% of the non-U.S. citizen parents report having a “DACA-eligible” child—one brought to the United States prior to age 18 and lacking legal residency status.

Just over 40% of TPS parents moved to the United States in order for the parent or spouse to improve their employment situation, compared with less than a fifth of permanent resident and undocumented parents. In addition, over 40% of permanent residents moved to reunite with family in the United States, compared with about a quarter of TPS and undocumented parents. Over half of the non-U.S. citizen parents (i.e., TPS, undocumented, permanent residents) moved to the United States to escape gangs or violence and almost 40% did so for their children to get a better education. Finally, almost half of TPS parents (48.6%) reported high psychological distress, compared with about a quarter of undocumented (23.2%) and permanent resident (27.1%) parents and just 8.1% of U.S. citizen parents.

#### Variations in immigration impacts by parents' residency status

Table 2 presents results for parental responses to immigration actions and news. As shown, the majority of TPS and undocumented parents reported that immigration news and actions led them to very often or always (1) worry about family separation; (2) feel their child had been negatively affected; and (3) worry it would be hard for their child to finish school. Although TPS parents were more likely than other groups to report concerns about the safety and well-being of the family and children, substantial proportions of undocumented and permanent resident parents reported these same concerns. Specifically, a substantial proportion of TPS, undocumented, and permanent resident parents reported having frequently (1) warned their children to stay away from authorities; (2) talked to their children about changing behaviors such as where they hang out; (3) avoided seeking medical care, public assistance (e.g., Supplemental Nutrition Assistance Program, The Special Supplemental Nutrition Program for Women, Infants, and Children), or help from the police; and (4) felt that their child or themselves had been negatively affected by immigration actions and news. Undocumented parents were most likely to report jobs concerns including (1) having a hard time imagining they could get a job or keep a job;

(2) believing it would be hard to get a better job or make more money; and (3) worrying that it would be hard for their children to get a job. There were no significant differences in the proportions of TPS, undocumented, and permanent residents who reported frequently changing daily routines or worrying about contact with authorities such as police.

Due to small cell sizes, we do not present results for the most extreme immigration consequences; these responses did not differ significantly by residency status. Overall, between 14% and 18% of parents reported “very often” or “almost always/always” being stopped, questioned or harassed, and/or considered leaving the country. U.S. citizens were least likely to report all other adverse immigration impacts.

#### How immigration impacts matter for parents' psychological distress

A parent's odds of being highly psychological distressed were significantly greater if the parent frequently modified behavior in response to immigration actions and news. Results in Table 3 include unadjusted odds ratios as well as adjusted odds ratios. The odds of a parent's high psychological distress were 118% greater for parents who frequently avoided contact with authorities such as the police (44.3% vs. 19.2%, AOR = 2.18, CI: 1.03–4.60) and three to four times greater for parents who frequently warned their child to stay away from authorities (43.6% vs. 9.9%, AOR = 4.06, CI: 1.75–9.45); worried it would be hard for their child to get a job (40.8% vs. 14.0%, AOR = 3.19, CI: 1.49–6.81); worried that family members would get separated (35% vs. 9.6%, AOR = 3.52, CI: 1.28–9.67); and considered leaving the United States (51.4% vs. 20.6%, AOR = 4.13, CI: 1.71–9.96). The odds of high psychological distress were 8–11 times higher when parents reported that, due to immigration actions and news, they had frequently been stopped, questioned or harassed (60.0% vs. 21.0%, AOR = 8.03, CI: 2.68–24.05); avoided seeking medical care or assistance from police and government services (48.8% vs. 11.6%, AOR = 5.30, CI: 2.45–11.47); talked to their child about changing behaviors such as where the child hangs out (49.0% vs. 6.2%, AOR = 8.74, CI: 3.42–22.39); felt negatively affected (49.5% vs. 7.8%, AOR = 7.78, CI: 3.33–18.20); believed that their children had been

**Table 2**

Proportion of parents in different residency statuses reporting “Very Often” or “Almost Always/Always” experiencing outcomes due to immigration news and events, n = 213

Due to immigration actions and news	Undocumented	TPS	Resident	U.S. citizen	Total	Chi-square (df)
Parent Often or Almost Always/Always	n (%)	n (%)	n (%)	n (%)	n (%)	significance test
Hard to get or keep a job	<b>33 (47.8)<sup>†</sup></b>	11 (29.7) <sup>†‡</sup>	17 (24.3) <sup>‡</sup>	2 (5.4) <sup>§</sup>	63 (29.6)	$\chi^2(3) = 22.35^{***}$
Hard to imagine better job, more money	<b>48 (69.6)<sup>†</sup></b>	15 (40.5) <sup>‡</sup>	25 (35.7) <sup>‡</sup>	6 (16.2) <sup>§</sup>	94 (44.1)	$\chi^2(3) = 32.00^{***}$
Worried will be hard for child to get job	<b>42 (60.9)<sup>†</sup></b>	21 (56.8) <sup>†‡</sup>	29 (42.0) <sup>‡</sup>	6 (16.2) <sup>§</sup>	98 (46.2)	$\chi^2(3) = 21.50^{***}$
Warned child to stay away from authorities	38 (55.1) <sup>†</sup>	<b>28 (77.8)<sup>‡</sup></b>	30 (42.9) <sup>‡</sup>	5 (13.5) <sup>§</sup>	101 (47.6)	$\chi^2(3) = 32.55^{***}$
Worried family members will get separated	<b>61 (88.4)<sup>†</sup></b>	<b>31 (83.8)<sup>†</sup></b>	40 (57.1) <sup>‡</sup>	8 (21.6) <sup>§</sup>	140 (65.7)	$\chi^2(3) = 55.35^{***}$
Changed daily routines	<b>28 (41.2)<sup>†</sup></b>	<b>17 (45.9)<sup>†</sup></b>	<b>22 (31.4)<sup>†</sup></b>	3 (8.1) <sup>‡</sup>	70 (33.0)	$\chi^2(3) = 15.30^{**}$
Avoided medical care, police, and services	29 (42.0) <sup>†</sup>	<b>23 (62.2)<sup>‡</sup></b>	24 (34.3) <sup>†‡§</sup>	8 (21.6) <sup>§</sup>	84 (39.4)	$\chi^2(3) = 13.89^{**}$
Child negatively affected	<b>39 (56.5)<sup>†</sup></b>	<b>22 (61.1)<sup>†</sup></b>	25 (37.3) <sup>‡</sup>	6 (16.2) <sup>§</sup>	92 (44.0)	$\chi^2(3) = 21.47^{***}$
Worried hard for child to finish school	<b>40 (58.0)<sup>†</sup></b>	<b>28 (75.7)<sup>†</sup></b>	24 (34.3) <sup>‡</sup>	6 (16.2) <sup>§</sup>	98 (46.0)	$\chi^2(3) = 34.18^{***}$
Child affected at school	26 (37.7) <sup>†</sup>	<b>24 (64.9)<sup>‡</sup></b>	23 (32.9) <sup>†</sup>	5 (13.9) <sup>§</sup>	78 (36.8)	$\chi^2(3) = 21.15^{***}$
Parent negatively affected	34 (50.0) <sup>†‡</sup>	<b>24 (64.9)<sup>†</sup></b>	30 (44.1) <sup>‡</sup>	7 (18.9) <sup>§</sup>	95 (45.2)	$\chi^2(3) = 16.76^{**}$
Worried contact with police, authorities	<b>24 (34.8)<sup>†</sup></b>	<b>12 (32.4)<sup>†</sup></b>	<b>21 (30.4)<sup>†</sup></b>	4 (10.8) <sup>‡</sup>	61 (28.8)	$\chi^2(3) = 7.38$
Talked to child about changing behavior, such as where s/he hangs out	37 (53.6) <sup>†‡</sup>	<b>24 (64.9)<sup>†</sup></b>	31 (44.3) <sup>‡</sup>	8 (21.6) <sup>§</sup>	100 (46.9)	$\chi^2(3) = 15.73^{**}$
Total	n = 69	n = 37	n = 70	n = 37	n = 213	

Bolded numbers signify the residency status with the highest proportion of parents reporting “very often” or “almost always/always” experiencing a particular adverse outcome. Some categories do not add up to 213 due to item-level missing data.

\*\*  $p < .01$ ; \*\*\*  $p < .001$ .

<sup>†‡§</sup> Proportions in the same row that do not share superscripts differ at  $p < .05$  using Chi-square tests of significance.

**Table 3**  
Immigration actions and news as correlates of parent's high psychological distress (n = 213)<sup>a,b</sup>

	Number	%	Bivariate		Multivariate	
			OR	95% CI	AOR	95% CI
Due to Immigration Actions and News, Parent "Very Often" or "Always"… <sup>c</sup>	#	%	OR	95% CI	AOR	95% CI
Believe hard to find or keep a job	63	29.6	2.67**	(1.38–5.20)	1.79	(.82–3.88)
Believe hard to get better job, more money	94	44.1	1.76	(.93–3.32)	1.56	(.73–3.33)
Worried will be hard for child to get job	98	46.2	3.86***	(1.96–7.57)	3.19**	(1.49–6.81)
Warned child to stay away from authorities	101	47.6	6.48***	(3.08–13.64)	4.06**	(1.75–9.45)
Worried family members will get separated	140	65.7	5.82***	(2.34–14.43)	3.52*	(1.28–9.67)
Changed daily routines	70	33.0	3.24***	(1.68–6.25)	2.07	(.99–4.32)
Avoided medical care, police, and services	84	39.4	7.67***	(3.77–15.61)	5.30***	(2.45–11.47)
Child has been negatively affected	92	44.0	15.79***	(6.60–37.77)	10.39***	(4.01–26.92)
Worried will be hard for child finish school	98	46.0	12.03***	(5.26–27.51)	9.85***	(3.81–25.42)
Child has been affected at school	78	36.8	13.22***	(6.12–28.57)	7.65***	(3.33–17.53)
Has been negatively affected	95	45.2	11.25***	(5.06–25.01)	7.78***	(3.33–18.20)
Avoided contact with police, authorities	61	28.8	3.21**	(1.64–6.28)	2.18*	(1.03–4.60)
Considered leaving United States	37	17.5	4.00***	(1.85–8.64)	4.13**	(1.71–9.96)
Been stopped, questioned, and harassed	30	14.2	5.72***	(2.38–13.76)	8.03***	(2.68–24.05)
Talked to child about changing behavior, such as where child hangs out	100	46.9	14.50***	(6.09–34.51)	8.74***	(3.42–22.39)

AOR = adjusted odds ratio; CI = confidence interval; OR = odds ratio.

<sup>a</sup> Each immigration impact variable was examined in separate logistic models.

<sup>b</sup> Adjusted models control for parent's residency status; gender; having at least a high school education; and, reporting that a family member was detained or deported since the new President took office in 2017. Years living in the United States and country of origin were not included in multivariate models due to multicollinearity with residency status.

<sup>c</sup> The reference group includes responses of "never/almost never," "not very often," or "sometimes."

\*  $p \leq .05$ ; \*\*  $p \leq .01$ ; \*\*\*  $p \leq .001$ .

negatively affected (51.1% vs. 6.8%, AOR = 10.39, CI: 4.01–26.92); expected their children would have a hard time finishing school (48.0% vs. 7.8%, AOR = 9.85, CI: 3.81–25.42), and thought their children had been affected at school (55.1% vs. 9.0%, AOR = 7.65, CI: 3.33–17.53). Once control variables were included, parent reports of having changed daily routines, feeling it was harder to find or keep a job and having a hard time imagining getting a better job or making more money, were not associated with parents' psychological distress.<sup>3</sup>

## Discussion

Contemporary immigration actions and news have had profound and far-reaching adverse impacts on U.S. Latino parents raising adolescents. In a departure from prior research [8,19], this descriptive study is informative about Latino parents across a hierarchy of residency statuses. Although parental worries and behavior modifications tied to immigration actions and news were least prevalent among U.S. citizens, pernicious immigration-related consequences were by no means limited to the undocumented. Across noncitizen groups, especially those with TPS, parents experienced concern for family, as indicated by parents warning their children to avoid authorities; avoiding medical care, public assistance, or the police; and, worrying that their children had been negatively affected at school due to immigration actions and news. Similarly high proportions of TPS and undocumented parents had frequently talked to their children about changing behaviors such as where they hang out, felt that the immigration actions and news negatively affected the parent, and

worried about their own and their children's job prospects. As suggested by research on DACA recipients [15], the vulnerability of TPS parents in this study may stem from the temporary nature of the TPS program and/or the stress of having undocumented family members [26,32]. Almost all TPS parents in this study has lived in the United States for more than 15 years, and 60% had experienced a family member's deportation or detention during the first nine months of the new president's term in office. Taken together, these findings highlight the pronounced vulnerability of TPS parents vis-à-vis today's immigration changes.

Evidence for adverse consequences of immigration actions and news across residency statuses is consistent with research indicating that immigration policy can be equally harmful to documented and undocumented Latinos [23,32]. TPS and, in some cases, permanent resident parents were at least as harmed by immigration events as were undocumented parents. In this way, our findings do not support the idea of "hierarchy" of residency status but rather point to the uniquely protective value of having U.S. citizenship. A substantial proportion of non-U.S. citizen parents frequently engaged in behaviors designed to avoid the attention of government authorities. These parental responses align with prior research indicating that Latino immigrants often hesitate contacting police for fear of mistreatment and/or the deportation of another family member [33]. Given that over half of the non-U.S. citizen parents in this study moved to the United States to escape gangs and violence, unease among these parents is especially understandable. Regardless of residency status, a small proportion of Latino parents (approximately 15% to 18%) reported "very often" or "always" considering leaving the United States and/or getting stopped, harassed, or questioned. These findings support the conclusion drawn by Enriquez that "sanctions intended for undocumented immigrants seeped into the lives of individuals who should have been protected by their citizenship status."

Adverse immigration impacts were associated with at least a 300% increase in the odds of a parent having high psychological distress. Worrying about youth's education, perceiving

<sup>3</sup> Post hoc analyses indicated that just three of 15 two-way interaction terms between residency status and immigration impacts were statistically significant (all suggested stronger immigration impacts on psychological distress for U.S. citizen and permanent resident than for TPS and undocumented parents). Given concerns about a Type I error, we concluded that associations between immigration-related impacts and the odds of parents having high psychological distress were similar for Latino parents specifically targeted by official immigration actions and those not specifically targeted.

negative impacts on the family, being stopped/questioned/harassed, and considering leaving the United States appeared to be especially harmful; frequently experiencing these outcomes was associated with more than an eight-fold increase in the odds of a parent's high psychological distress. Unlike parental concerns about their family, parent aspirations for their own upward mobility (e.g., hoping to get a better job or make more money) appeared not to compromise parents' mental health once accounting for background variables.

Regardless of societal concerns about the mental health and well-being of Latino adults, our findings raise serious concerns about the health and well-being of U.S. Latino adolescents. Adolescents whose parents get deported often experience post-traumatic stress disorder [9]. In this research, almost two-thirds of parents frequently worried about family separation and close to half frequently warned their adolescent children to stay away from authorities, talked to their children about changing behaviors such as where they hang out, and avoided access to medical care, police, and public assistance. These behaviors directly threaten youth's safety and mental and physical health and can be indirectly harmful by way of parents' psychological distress [34]. Although risks likely are magnified for adolescents whose parents are not U.S. citizens, the vast majority of Latino adolescents in this study were U.S. citizens. Thus, even though Latino youth themselves are not undocumented, they face risks to well-being on account of their parents' vulnerable residency status [35].

This study is not without limitations and suggests important directions for future research. First, this study's use of cross-sectional data limits causal inferences. Second, the reliance on self-reported data for a convenience sample of Latinos from a single immigrant community is limiting. A larger sample size would help elucidate findings for TPS parents, a group at heightened risk for adverse outcomes. Given that many Latino parents, may live in "mixed-status" families with documented and undocumented family members, it will be important for future research to explicitly investigate the unique difficulties faced by mixed-status families [36]. Third, given the small number of parents with children covered by the DACA program in this study, further research is needed to elucidate the degree to which DACA protections may or may not shield parents from immigration-related concerns and worries. Fourth, it is unclear how parental responses to today's immigration actions and news might differ from those experienced during the Obama administration, which witnessed even higher numbers of deportations to Mexico and Central America. In this regard, however, any comparison is complicated by the fact that President Trump's election in 2016 was followed by fewer attempted illegal crossings into the United States, an increased number of deportations in the interior of the country, and expanded eligibility for deportation, resulting in more deportations of individuals with long histories of law-abiding behavior [37]. Finally, our study did not investigate Latino parents' experiences of racism and discrimination. Yet, stress tied to discrimination experiences are highly prevalent among Latino immigrants and positively associated with anti-immigrant policies [38] and inequity due to residency status [11]. Given that parents' reports of being frequently stopped, questioned, or harassed due to immigration actions and news did not differ by residency status, it is possible that immigration changes increased racial profiling for a much larger segment of the U.S. Latino population than has been targeted by official immigrant actions.

Public discourse around immigration has progressed at a rapid pace since the 2016 presidential campaign and election. Extant research has demonstrated that residency status serves as a mechanism of social stratification affecting Latino citizen youth by blocking access to critical developmental resources [39]. The current study suggests that increased anti-immigrant and anti-Latino rhetoric taking place [1,2] may lead to psychological distress among Latino parents of adolescents—a finding that generalized to all four residency status groups. Community-based organizations must educate Latino residents about their rights, ensure that these rights are not violated, and counteract rumors that can have a chilling effect on Latino families' use of public services. Given robust negative implications of parent psychological distress for adolescents [20,21], alongside the large portion of Latino adolescents who are U.S. citizens, pathways to citizenship for Latino parents are critical in order to mitigate long-term, collateral consequences for numerous Americans.

### Acknowledgments

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# Exhibit C

## The Science is Clear: Separating Families has Long-term Damaging Psychological and Health Consequences for Children, Families, and Communities

After the United States Department of Justice announced the “Zero Tolerance Policy for Criminal Illegal Entry,” Immigration and Custom Enforcement (ICE — an arm of the Department of Homeland Security) separated approximately 2,000 children from their parents in April and May 2018 as they approached the U.S. border. Children and parents were placed in separate facilities as they were being processed and were not told when or how they would be reunited. This policy and its consequences have raised significant concerns among researchers, child welfare advocates, policy makers, and the public, given the overwhelming scientific evidence that separation between children and parents, except in cases where there is evidence of maltreatment, is harmful to the development of children, families, and communities. Family separations occurring in the presence of other stressors, such as detention or natural disaster, only adds to their negative effects.

### Evidence on Harmful Effects of Parent-Child Separation

The evidence that family separation is harmful dates back to studies on the effects of parent-child separations on children’s well-being during World War II. This research documented far reaching effects of these separations into adulthood, including increased risk for mental health problems, poor social functioning, insecure attachment, disrupted stress reactivity, and mortality (Pesonen & Räikkönen, 2012; Rusby & Tasker, 2009; Mitrani, Santisteban, & Muir, 2004). Other research similarly documents the harmful effects of parental separation on child well-being in a variety of other child populations including children in Romanian orphanages (Zeanah, Nelson, Fox, et al., 2003), children in foster care (Flannery, Beauchamp, & Fisher, 2017) and children of incarcerated parents (Geller, Garfinkel, Cooper & Mincy, 2009; Miller, 2006). More recent work has documented the increased mental health risk faced by both parents and children when they are separated in the immigration process (Suarez-Orozco, Bang, & Kim., 2011; Rusch & Reyes, 2013). Parent-child separation has long-term effects on child well-being, even if there is subsequent reunification. After being separated, reunited children can experience difficulty with emotional attachment to their parents, self-esteem, and physical and

psychological health (Smith, Lalonde, & Johnson, 2004; Gubernskaya & Debry, 2017). For some children, time does not appear to fully heal these psychological wounds (Shonkoff et al., 2012).

### Parents Buffer Children from Adverse Effects of Toxic Stress

Parental separation is considered a toxic stressor, an experience that engages strong and prolonged activation of the body’s stress-management system (Bridgman, 2014). The physiological and psychological toll of early life stress, including parental separation, changes how the body responds to stress in the long term, disrupting higher-order cognitive and affective processes as well as negatively altering brain structures and functioning (Lupien, McEwen, Gunnar, & Heim, 2009; Pechtel & Pizzagalli, 2011; Kumar et al., 2014). Such stressors put children at greater risk for a multitude of health and psychological impairments, including anxiety, depression, post-traumatic stress disorder, lower IQ, obesity, immune system functioning, physical growth, cancer, heart and lung disease, stroke, and morbidity (Granqvist, Sroufe, Dozier, Hesse, & Steele, 2017; Heim & Nemeroff, 2001; Maniam, Antoniadis, & Morris, 2014; Pechtel & Pizzagalli, 2011; Shirtcliff, Coe, & Pollak, 2009; Taylor, 2010).

Children depend on their primary caretakers to successfully navigate stressful and traumatic events. Children's physiological responses to stress can be significantly reduced by access to their primary caretaker (Hostinar, Sullivan, & Gunnar, 2013). The separation of the family unit under extreme conditions of stress worsens the psychological and physiological ramifications of that stressor on children, especially younger children (Masten & Narayan, 2012). Conversely, ongoing contact with primary caregivers under conditions of stress can protect against risk (Rodriguez & Margolin, 2015).

### Child-Separation from Parents Impacts Children at All Ages

Much of the research on family separation has focused on the impacts on children early in development. However, puberty is also an especially vulnerable time of rapid change (Doom & Gunnar, 2013). Stressors during adolescence can have lasting impacts — the effects of which may not become evident until adulthood — (Humphreys, Gleason, Drury, et al., 2015; Lupien, McEwen, Gunnar, & Heim, 2009). Further, the effects of traumatic experiences are cumulative; children and adolescents who have already faced previous adversity are particularly susceptible to long term further negative consequences (Brown, Anda, & Tiemeier, et al, 2009; MacKenzie, Bosk, & Zeanah, 2017). Thus, the research shows that across infancy, childhood, and adolescence, child-family separations can be related to negative outcomes across the lifespan.

**Parent-child separations lead to a host of long-term psychological, social, and health problems that are not necessarily resolved upon reunification.**

*Full references are available at [www.srcd.org/policy-media/statements-evidence](http://www.srcd.org/policy-media/statements-evidence)*

### Impact of Border Family Separations on U.S. Citizens

There is also evidence that family separations harm U.S. citizens whose family members experience border detention or deportation. Parental separation increases the risk for these U.S. children's mental health problems such as anxiety, depression, behavior problems, and symptoms of post-traumatic stress disorder (Allen, Cisneros, & Tellez, 2015; Rojas-Flores, Clements, Hwang Koo, & London, 2017; Zayas, Aguilar-Gaxiola, Yoon, & Rey, 2015). U.S. citizens of Latino descent also report heightened worries and concerns for their families and their communities as a result of changes in implementation of immigration policies such as the Deferred Action for Childhood Arrivals (DACA) policy (Roche, Vaquera, White, & Rivera, 2018). Moreover, countries with supportive integration policies are more likely to have child populations with better overall health and mental health indicators than those with less supportive approaches (Marks, McKenna, & Garcia Coll, 2018). Thus, there is evidence that policies about parental separations can negatively affect American citizens.

### The Policy Implications are Clear

The scientific evidence is conclusive. Parent-child separations lead to a host of long-term psychological, social, and health problems that are not necessarily resolved upon reunification. In particular, the disruption of biological stress regulation mechanisms in the body induced by the need to seek refugee or asylum status are further taxed by the absence of parental support. The science is clear: policies that separate immigrant families upon entry to the U.S. have devastating and long-term developmental consequences for children and their families.

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The Society for Research in Child Development (SRCD) advances developmental science and promotes its use to improve human lives. Established in 1933 by the National Academy of Sciences, SRCD is an interdisciplinary scientific organization with members from more than 50 countries. This *Statement of the Evidence* was authored by invited experts in the field, and designed to summarize leading scientific evidence to inform policy decisions and improve the lives of children and families. We thank the SRCD Latino Caucus for their contributions. © Society for Research in Child Development, 2018

# Exhibit 59

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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON, et al.,  
  
Plaintiff,  
  
v.  
  
THE UNITED STATES OF AMERICA,  
et al.,  
  
Defendants.

NO. 2:18-cv-00939  
  
DECLARATION OF PIA  
ESCUDERO IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
EXPEDITED DISCOVERY

I, Pia Escudero, declare as follows:

1. I am over the age of 18 and have personal knowledge of the matters contained within this Declaration. If I am called upon to testify as to the statements made herein, I could and would competently testify hereto.

2. I am a national mental health leader and social work professional with nearly 30 years working as a psychiatric social worker. For the past 10 years, I have served as the director of the School Mental Health and Crisis Counseling & Intervention Services, within the Student Health and Human Services Division of the Los Angeles Unified School District ("LAUSD" or "District").

3. As the director of the School Mental Health and Crisis Counseling & Intervention Services, I oversee and manage School Mental Health professionals and services

1 that promote the mental health, well-being and academic achievement of all LAUSD students.  
2 LAUSD programs support positive student connections with peers, family, school and  
3 community to facilitate student development and academic success. They also facilitate the  
4 ability to successfully deal with problems, crises, or traumatic experiences. For the past 20  
5 years, I have collaborated with research partners at UCLA, USC and RAND Corporation to  
6 develop cutting edge, evidence-based practices for individuals, groups, and classrooms to treat  
7 youth exposed to violence and traumatic events.

8 4. As the nation's second largest school district, LAUSD is proud to bring together  
9 students and families from diverse backgrounds and cultures, many of whom are immigrants.  
10 In fact, members of our school communities speak 94 languages other than English, including  
11 Spanish, Armenian, Korean, Tagalog, Cantonese, and Arabic.

12 5. As determined by the California Supreme Court in *Serrano v. Priest*, LAUSD  
13 believes education is a fundamental right for all children. LAUSD has been on the forefront of  
14 ensuring that all students, regardless of immigration status, are afforded a free public education  
15 aligned with the United States Supreme Court case of *Plyler v. Doe*, which held that  
16 undocumented children have a constitutional right to receive a free public K-12 education that  
17 provides the means to becoming a "self-reliant and self-sufficient participant in society"  
18 and instills the "fundamental values necessary to the maintenance of a democratic political  
19 system."

20 6. LAUSD has long welcomed immigrant students and provided comprehensive  
21 academic, health, and social-emotional supports so they can learn and achieve their academic  
22 potential. The District's School Mental Health department, first established in 1933, today  
23 employs over 400 psychiatric social workers, psychiatrists, and support staff, who partner with  
24 educational professionals to address barriers that prevent students from learning to optimize  
25 their academic achievement.

26 7. School Mental Health provides services throughout the district, using an

1 integrated and comprehensive approach that employs (1) universal, (2) targeted, and (3)  
2 intensive remedies. Universal strategies are aimed at all school stakeholders and include  
3 teacher and parent training in mental health awareness, psychological first aid, and the  
4 promotion of resiliency and nonviolence among students school wide and in the classrooms.  
5 Targeted services are designed for early intervention for at-risk students. LAUSD also operates  
6 15 Wellness Centers and 7 Mental Health Clinics that provide intensive therapeutic services to  
7 individuals, groups, and families. These programs emphasize evidence-based, trauma-specific  
8 interventions to address significant mental, emotional, and behavioral disorders.

9         8.       The forcible separation of immigrant children from their parents is traumatic  
10 and cruel, and runs counter to our ethical standards, societal norms, and national aspirations.  
11 Studies have demonstrated that such trauma can cause irreparable harm: trauma can literally  
12 rearrange the brain’s wiring, affecting areas dedicated to pleasure, engagement, control, and  
13 trust.<sup>1</sup>

14         9.       In my experience, a system that induces trauma to children and other vulnerable  
15 populations inevitably incurs additional and costly services to repair the cognitive and  
16 emotional damage it has caused. Based on news reports, I have learned about the federal  
17 government’s recent practice of separating migrant families, which has led to a population of  
18 over 2,000 separated children. The trauma endured by these children requires access to  
19 necessary mental health services. Studies show that forced separation from parents in these  
20 circumstances negatively impacts the educational outcomes of students, causing increased  
21 anxiety and withdrawal, inability to focus on learning, and fear of being left alone.<sup>2</sup> If any of

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22               Bessel van der Kolk, *The Body Keeps Score* (New York: Viking, 2014), referenced in Alejandra Acuña  
23 and Pia Valenzuela Escudero, “Helping Those Who Come Here Alone,” *Kappan Magazine* 97, no. 4 (2016): 43.

24               <sup>2</sup> See, e.g., Patricia Gandara and Jongyeon (Joy) Ee, “U.S. Immigration Enforcement Policy and Its  
25 Impact on Teaching and Learning in the Nation’s Schools,” The Civil Rights Project, last modified February 28,  
26 2018. <https://www.civilrightsproject.ucla.edu/research/k-12-education/integration-and-diversity/u.s.-immigration-enforcement-policy-and-its-impact-on-teaching-and-learning-in-the-nations-schools>; “How DACA Affects the Health of America’s Children,” Immigration Policy Lab, accessed June 29, 2018. <https://immigrationlab.org/project/daca-affects-health-americas-children/>; J. Hainmueller et al., “Protecting Unauthorized Immigrant Mothers Improves Their Children’s Mental Health,” *Science* (August 2017).



1 the children separated from their families enters LAUSD, s/he will have access to LAUSD's  
2 mental health services.

3 10. Children need their parents and other caregivers to thrive in school. In my  
4 experience, children who endure trauma, such as family separation, have a much more difficult  
5 time in school and require more mental health services to alleviate trauma and psychological  
6 damage.

7 I declare under penalty of perjury under the laws of the State of California that the  
8 foregoing is true and correct.

9 Executed this 29<sup>th</sup> day of June, 2018 at Los Angeles, California.

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12 \_\_\_\_\_  
13 PIA ESCUDERO  
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# Exhibit 60

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7 **UNITED STATES DISTRICT COURT**  
**WESTERN DISTRICT OF WASHINGTON**

8 STATE OF WASHINGTON, et al.,

NO. 18-cv-00939

9 Plaintiff,

DECLARATION OF DONNA M.  
BRADBURY

10 v.

11 DONALD TRUMP in his official capacity  
as President of the United States, et al.,

12 Defendants.  
13

14 I, DONNA M. BRADBURY, declare as follows:

15 1. I am over the age of 18 and have personal knowledge of all the facts stated herein.

16 2. I am Associate Commissioner for the Division of Integrated Community Services  
17 for Children and Families at the New York State Office of Mental Health (“OMH”). I hold a  
18 Master’s Degree in Psychology and am licensed as a Mental Health Counselor in New York  
19 State. I have been employed by OMH since 2007.

20 3. The New York State public mental health system provides services annually to  
21 more than 772,000 individuals throughout the State of New York  
22 ([www.omh.ny.gov/omhweb/planning/docs/507-plan.pdf](http://www.omh.ny.gov/omhweb/planning/docs/507-plan.pdf)). OMH is a primary component of New  
23 York State’s public health system. OMH operates psychiatric centers across the State of New  
24 York, and regulates, certifies and oversees more than 4,500 programs which are operated by  
25 local governments and nonprofit agencies (“Providers”)  
26 ([www.omh.ny.gov/omhweb/planning/docs/507-plan.pdf](http://www.omh.ny.gov/omhweb/planning/docs/507-plan.pdf)). These programs include various

1 inpatient and outpatient programs, emergency, community support, residential and family care  
2 programs. The mission of OMH is to promote the mental health of all who reside in New York  
3 State, with a particular focus on providing recovery for adults with serious mental illness and  
4 children with serious mental disturbances.

5 4. OMH receives its funding, in the approximate amount of \$3.97 billion annually  
6 (<https://www.omh.ny.gov/omhweb/budget/16-17-eb/pdf>), from the State of New York. Each  
7 year, the entirety of OMH's budget is allocated toward supporting programs and services that  
8 are designed to address the needs of adults and children in the State of New York with mental  
9 illness or who are otherwise in need of mental health services. OMH expends extensive resources  
10 to offer a broad array of community services, programs and activities that assist residents of New  
11 York State and that are intended to prevent or reduce the disabling effects of mental illness.  
12 OMH considers the mental health needs of all populations Statewide in allocating the resources  
13 it receives from the New York State budget, regardless of citizenship status.

14 5. OMH is currently organized into various divisions responsible for mental health  
15 services in New York State. One of these is the Division of Integrated Community Services for  
16 Children and Families.

17 6. As Associate Commissioner for the Division of Integrated Community Services  
18 for Children and Families, I am responsible for the oversight of a Statewide array of community  
19 based mental health services for children and their families. Pursuant to my work with OMH in  
20 this and prior positions, my prior professional experience, and my educational background, I am  
21 familiar and knowledgeable about impacts on the mental health of children.

22 7. The disabling effects of mental illness in adults can result in homelessness,  
23 joblessness, health problems, involvement with the criminal justice system, and social isolation.  
24 In children, these effects are often serious and long lasting, leading to poor academic  
25 achievement, failure to complete high school, substance abuse, involvement with the correctional  
26 system, lack of vocational success, inability to live independently, and health problems.

1           8.       The first five years of life, especially, are critically important for both the child  
2 and family. Key to a young child’s healthy growth and development are nurturing relationships  
3 between the family and child. OMH recognizes that secure parent and child attachment is critical  
4 to healthy development, and that family relationships form the foundation of social and  
5 emotional wellness for children and youth. Parent involvement in children’s lives mitigates the  
6 effects of stress and trauma.

7           9.       Disruptions in the parent-child attachment are very problematic and have  
8 significant mental health implications. Young children separated from their parents show  
9 immediate signs of anxiety, depression, and disruptions in eating and sleeping patterns.

10          10.       Parent-child separation creates more than momentary stress; it can have long-  
11 term detrimental effects on physical and emotional well-being. Some longer- term effects include  
12 Post-Traumatic Stress Disorder, engagement in high-risk behaviors, problems with impulse  
13 control, difficulty with learning and processing information, and challenges with forming and  
14 maintaining healthy relationships. Studies with which I am familiar show that traumatic events  
15 early in life play out in the form of physical and mental disease later in life, and prolonged,  
16 chronic stress actually changes the structure of the brain, leading to poor outcomes for children.

17          11.       In light of the above, OMH policies support family involvement in every aspect  
18 of treatment. OMH’s stance is that children belong with their family, and that even in instances  
19 of abuse and neglect, work should be done to engage the parents in therapeutic work to repair  
20 relationships and increase safety. OMH also supports and encourages all OMH Providers to  
21 adopt trauma informed programming, so as to create safe and nurturing environments for all  
22 children and youth.

23          12.       OMH is aware that children whom Defendants have separated from their parents  
24 and sent to New York are already suffering psychological trauma, as would be expected. As one  
25 example, it has come to OMH’s attention that an unaccompanied alien child (“UAC”) from  
26 South America who is less than ten years of age, and who has been residing in an Office of

1 Refugee Resettlement contracted provider agency group home located in New York since early  
2 June, was recently transported to and held overnight for observation at an OMH-licensed  
3 Comprehensive Psychiatric Emergency Program at a hospital in the community. The UAC  
4 became extremely distraught at being separated from the UAC's father at the USA/Mexican  
5 border and verbalized wanting to jump out of a second story window. The UAC needed to be  
6 restrained by group home staff as the UAC was running towards a balcony. It was reported that  
7 no group home staff can speak the UAC's language (although the child can be understood to a  
8 limited degree), that the child speaks no English, and that the child was depressive and had  
9 recently begun exhibiting physically aggressive, impulsive and disruptive behavior in the group  
10 home.

11 13. The longer UACs are separated from the parents the more exacerbated will be  
12 such clear and evident psychological harm.

13 14. Not only are OMH and/or its Providers already providing mental health services  
14 to UACs during the current separation period, but OMH and/or its Providers will likely be  
15 administering or funding mental health services to some of these children not only for the  
16 foreseeable future, but potentially for years, as many UACs are expected to permanently remain  
17 in New York State.

18 15. As such, it is expected that the presence of UACs in New York State both  
19 currently and in the future will require an allocation of the finite resources available for mental  
20 health services Statewide, and may also impact waiting times for all those in need of certain  
21 services.

22 16. For instance, eleven of OMH's psychiatric centers provide inpatient services to  
23 youth and there are currently youth awaiting admission to these facilities. It is expected that with  
24 potentially hundreds, and even thousands, of UAC's experiencing the trauma of family  
25 separation and the resulting social isolation, many more youth may be in need of inpatient  
26 services at some point in the future.

1           17.     In addition, OMH Providers operate 18 Residential Treatment Facilities for  
2 Children, and OMH and/or its Providers operate 35 Community Residences for Children and 8  
3 Crisis Residences for Children (<https://my.omh.ny.gov/bi/pd/saw.dll?PortalPages>). Waitlists for  
4 these different services vary by region, but will only increase with any increased need for such  
5 services.

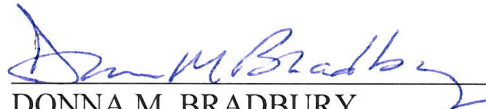
6           18.     OMH is obligated by regulation to provide services in such a manner as to assure  
7 that OMH facilities do not discriminate against a patient in terms of his or her race, color, sex,  
8 creed, religion, age or national origin. See 14 NYCRR 27.4. Citizenship status, or lack thereof,  
9 does not affect OMH's obligation to provide mental health services to those residing in New  
10 York State.

11           19.     While certain types of programs offered by OMH Providers are solely  
12 reimbursable by Medicaid, and therefore there would be no payment mechanism for those who  
13 are undocumented, other programs, such as OMH operated Community or Crisis Residences, as  
14 well as OMH's inpatient services, are solely state funded, which means that undocumented  
15 persons present in New York State, such as an UAC, are provided such services regardless of  
16 ability to pay at the ultimate expense of New York State and therefore its tax payers.

17           20.     Beds in OMH operated Community Residences, OMH operated Crisis  
18 Residences, and OMH inpatient facilities have significant financial costs to the State of New  
19 York.

1 I declare under penalty of perjury under the laws of the State of Washington and the  
2 United States of America that the foregoing is true and correct.

3  
4 DATED this 29th day of June, 2018 at Albany, New York.

5  
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8 DONNA M. BRADBURY  
9 Associate Commissioner  
10 New York State Office of Mental Health  
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# Exhibit 61

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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON,

Plaintiff,

v.

DONALD TRUMP in his official capacity  
as President of the United States, et al.,

Defendants.

NO.

DECLARATION OF TANIA M.  
CULLEY, CHILD ADVOCATE, IN  
SUPPORT OF PLAINTIFFS'  
MOTION FOR PRELIMINARY  
INJUNCTION

DECLARATION OF TANIA M. CULLEY, CHILD ADVOCATE, IN  
SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY  
INJUNCTION

I, Tania M. Culley, declare as follows:

1. I am over the age of 18 and have personal knowledge of all the facts stated herein.
2. I am the Child Advocate for the State of Delaware and lead the Office of the Child Advocate.
3. This declaration is submitted in support of Plaintiffs' Motion for Preliminary Injunction.
4. The Office of the Child Advocate is charged with safeguarding the welfare of the children of Delaware. 29 *Del. C.* § 9001A. In addition to providing policy and legislative advocacy on behalf of dependent, neglected and abused children, the Office of the Child Advocate is also charged with providing legal representation to each of those children who end up in the custody of the Department of Services for Children, Youth and Their Families.
5. In the State of Delaware, parents have the primary responsibility for meeting the needs of their children and the State has an obligation to help them discharge this responsibility. Delaware law explicitly declares that "the State has a basic obligation to promote family stability and preserve the family as a unit...." 29 *Del. C.* § 9001. Delaware law also recognizes that

1 preservation of the family as a unit is “fundamental to the maintenance of a stable, democratic  
2 society.” 10 *Del. C.* § 902(a).

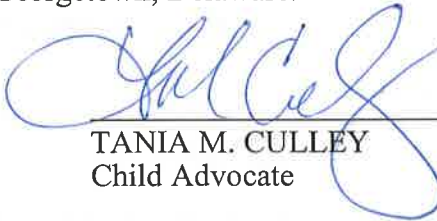
3 6. To that end, the state has directed its courts, when possible consistent with the  
4 safety of family members, to ensure that homes “remain unbroken.” The express statutory child  
5 welfare policy of the State is to “serve to advance the interests and secure the safety of the child,  
6 while preserving the family unit whenever the safety of the child is not jeopardized.” 16 *Del. C.*  
7 § 901. In order for the family unit to be disrupted, a child must be found to be dependent,  
8 neglected or abused in the parent’s care, and it must be in the best interests of the child. 10 *Del.*  
9 *C.* § 901; 13 *Del. C., Ch. 23 and 25.*

10 7. A complete injunction is necessary to protect the sovereignty of the State of  
11 Delaware by protecting its obligation to assist families should separated children ultimately be  
12 placed in Delaware, to assure that Delaware has authority over its facilities where children or  
13 families may be placed, and to ensure its legal, education and healthcare systems have the  
14 authority and resources to meet the needs of children and their families.

15 I declare under penalty of perjury that the foregoing is true and correct based on  
16 information and belief.

17 DATED this 27th day of June, 2018 at Georgetown, Delaware.

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TANIA M. CULLEY  
Child Advocate

# Exhibit 62

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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON,

Plaintiff,

v.

DONALD TRUMP in his official capacity  
as President of the United States, et al.,

Defendants.

NO.

DECLARATION OF MARIA  
MATOS IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION

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DECLARATION OF MARIA MATOS IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

I, Maria Matos, declare as follows:

1. I am over the age of 18 and have personal knowledge of all the facts stated herein.

2. I am the President and CEO of the Delaware Latin American Community Center.

3. This declaration is submitted in support of Plaintiffs' Motion for Preliminary Injunction.

4. The mission of the Latin American Community Center is "To empower the Latino Community through Education, advocacy, partnerships and exceptional service".

5. The Hispanic population in Delaware is the 40th largest in the nation. About 83,000 Hispanics reside in Delaware, 0.2% of all Hispanics in the United States. Delaware's population is 9% Hispanic, the 27th largest Hispanic statewide population share nationally. Hispanic male and female population is spread evenly throughout Delaware. Median age of Latinos in Delaware is 24 years old.

6. The majority of Hispanic homes in Delaware are family led. There are 40,000 Hispanic eligible voters in Delaware—the 40th largest Hispanic statewide eligible voter population nationally. Georgetown stands by itself. Even though the largest Hispanic population in Delaware is Mexican, Georgetown in particular is Guatemalan.

7. Senate Bill 59, Delaware Driving Privilege Card, passed by the legislature in 2013 was developed by the Undocumented Motorist Safety and Insurance Task Force. Delaware

1 Hispanic Commission developed the Delaware Hispanic Public Policy Agenda, a blueprint for  
2 the community.

3 8. The current policy of separating children from their families has our community  
4 afraid of what is going to happen next. The chilling effect upon our Latino population accessing  
5 justice/courts/family services, given the effect of the practices at the border states, have families  
6 thinking that their children can be taken. They fear leaving the State or country because of  
7 immigration and border policies, and the impact of these policies has added additional stress on  
8 an already stressed community.

9 9. A complete injunction is necessary to eliminate the chilling effect on the exercise  
10 of the fundamental rights of documented and undocumented immigrants presently residing in  
11 the State of Delaware.

12 I declare under penalty of perjury that the foregoing is true and correct based on  
13 information and belief.

14 DATED this 27th day of June, 2018 at Wilmington, Delaware.

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17 Maria Matos  
18 Maria Matos  
19 President and CEO of the  
20 Latin American Community Center  
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# Exhibit 63

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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON,

Plaintiff,

v.

DONALD TRUMP in his official capacity  
as President of the United States, et al.,

Defendants.

NO.

DECLARATION OF JAVIER  
TORRIJOS IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION

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DECLARATION OF JAVIER TORRIJOS IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

11 I, Javier Torrijos, declare as follows:

12 1. I am over the age of 18 and have personal knowledge of all the facts stated herein.

13 2. I am the Chair of the Delaware Hispanic Commission.

14 3. This declaration is submitted in support of Plaintiffs' Motion for Preliminary  
15 Injunction.

16 4. The mission of the Delaware Hispanic Commission is to expand and improve the  
17 representation of and advocacy for Delaware's Hispanic Community and to identify and address  
18 the most important needs of Delaware's rapidly growing Hispanic population. The Delaware  
19 Hispanic Commission is committed to enriching the lives of the Hispanic Community by  
20 enhancing and streamlining efforts to improve the delivery of services; bringing awareness of  
21 current issues to the state agencies; suggesting possible solutions for the agencies consideration;  
22 and keeping the Hispanic Community informed of available state assistance that exist for all  
23 Delaware residents. For more information about the Delaware Hispanic Commission visit our  
24 website at <http://hispanic.delaware.gov/>.

25

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1           5.       Attached please find the Power Point Presentation that was provided by the  
2 Delaware Department of Economic Development Office dated June 2013 showing data on the  
3 Hispanic demographics.  
4

5           6.       After the election of the POTUS in 2016 the Delaware Hispanic Commission in  
6 2017 focused on community conversations to inform and make the community aware of their  
7 civil rights. The rhetoric by the POTUS against the immigrant community raised fear and  
8 concern over deportation and separation of families, children, and local police working with ICE,  
9 discrimination, and violation of their civil rights. In one instance a mother brought to my  
10 attention that her child who is an American citizen was harassed in school and told to go back to  
11 their home country simply because the child looked Hispanic/Latino. The mother was deeply  
12 upset about the matter and couldn't believe this type of bullying was happening at the school  
13 where they are supposed to be free from discrimination and bullying. DHC engaged the  
14 Delaware Department of Education to help the community understand their rights (anti-bullying  
15 policy) and to report such matters in order to take the appropriate steps to protect their children.  
16 DHC through the community conversation also informed the community that the Delaware State  
17 Police and local law enforcement had not signed up for the 287G program and is not working  
18 with ICE officials to identify and deport the undocumented person.  
19

20           7.       DHC was also very instrumental in helping pass legislations that allowed  
21 individuals that are residents of the State of Delaware but didn't have legal status in the United  
22 States of America to obtain the Driving Privilege Card (DPC). Many individuals in the State  
23 have applied and has allowed them drive legally in the roadways of Delaware. However, since  
24 the current White House administration came into office the DHC has heard from individuals  
25 who refuse to apply for the DPC because they are afraid that ICE will obtain their information  
26

1 from the DMV and submit it to ICE. Delaware law protects their information but they are still  
2 fearful that the federal government will be able to override the State through the court system.  
3 The actions of the current White House Administration has impacted the State of Delaware in  
4 its business to have everyone legally registered to drive.

5  
6 8. The current policy of separating children from their families has the community  
7 afraid of what going to happen next. The chilling effect upon our Latino population accessing  
8 justice/courts/family services given the effect of the practices at the border states; have families  
9 thinking that their children can be taken, they fear leaving the State or country because of  
10 immigration and border policies; the impact of these policies have added additional stress on an  
11 already stressed community. An example of this chilling effect is from a very distressed  
12 Hispanic/Latina business woman who was not paid for the cleaning service she provided for a  
13 home construction developer. She cleaned the new homes for the developer before they would  
14 be turned over to the buyer. The home developer agreed to pay her for the cleaning each of the  
15 houses including his own. She told me that she was never compensated for her work totaling  
16 over \$40,000. Though she has a record for the proof of services (invoices, hours tracked, etc.)  
17 she is afraid to officially submit to the Delaware Department of Labor because of the fear of  
18 being report to ICE by the home developer. I have heard of similar cases like this where  
19 individuals will not report to authorities abuses that they have experienced because of the reprisal  
20 of being reported to ICE. Commission members have relayed many stories of this nature where  
21 individuals are afraid to report or say anything for fear of retribution. They live in the shadows  
22 hoping that ICE will not come and deport them.

23  
24 9. A complete injunction is necessary to eliminate the chilling effect on the exercise  
25 of the fundamental rights of documented and undocumented immigrants presently residing in  
26 the State of Delaware.

1 I declare under penalty of perjury that the foregoing is true and correct based on  
2 information and belief.

3 DATED this 29 day of June, 2018 at Dover, Delaware.

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7 Javier Torrijos  
8 Chair  
9 Delaware Hispanic Commission  
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# *Delaware's Hispanic Population*

Ed Simon, Research Analyst  
Delaware Economic Development Office  
(302) 672-6845  
edward.simon@state.de.us

June, 2013

# Overview

- Sources of Data
  - 2010 American Community Survey; Economic Census; and U.S. Dept. of Labor, Bureau of Labor Statistics.
  - Most data derived from the Census Bureau American FactFinder
  - Data quality - limitations
- Data Trends
  - Population, Age, Education, Poverty/Income, Hispanic owned businesses, occupational data
- Conclusion
  - Summary – what do the numbers show us
  - Comments, questions, next steps

## Rapid Population Growth

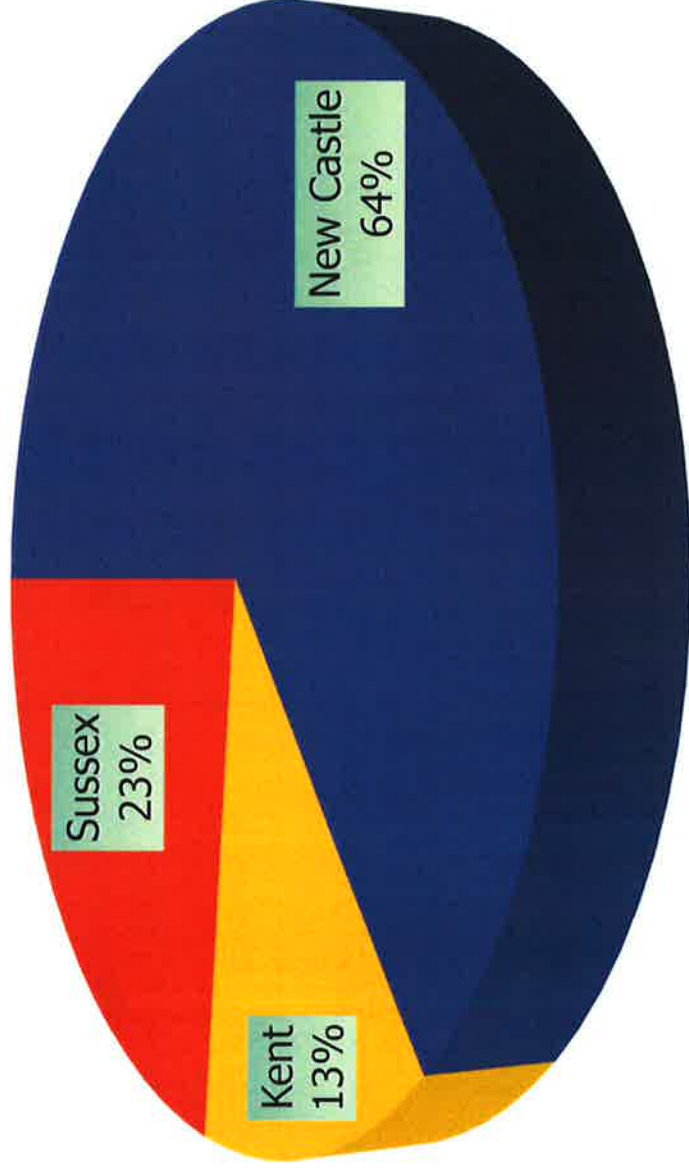
	2000	2010	Net gain	% increase
Delaware – Total	783,600	899,769	116,169	14.8%
Hispanic (Del.)	37,277	73,842	36,565	98.1%

Census, 2000; American FactFinder, 2010

## 2010 Hispanic Population

	Total	Male	Female
Delaware Statewide	73,842	38,170	35,672
New Castle County	47,156	24,333	22,823
Kent County	9,524	4,837	4,687
Sussex County	17,162	9,000	8,162

# Distribution of Hispanic Population - 2010

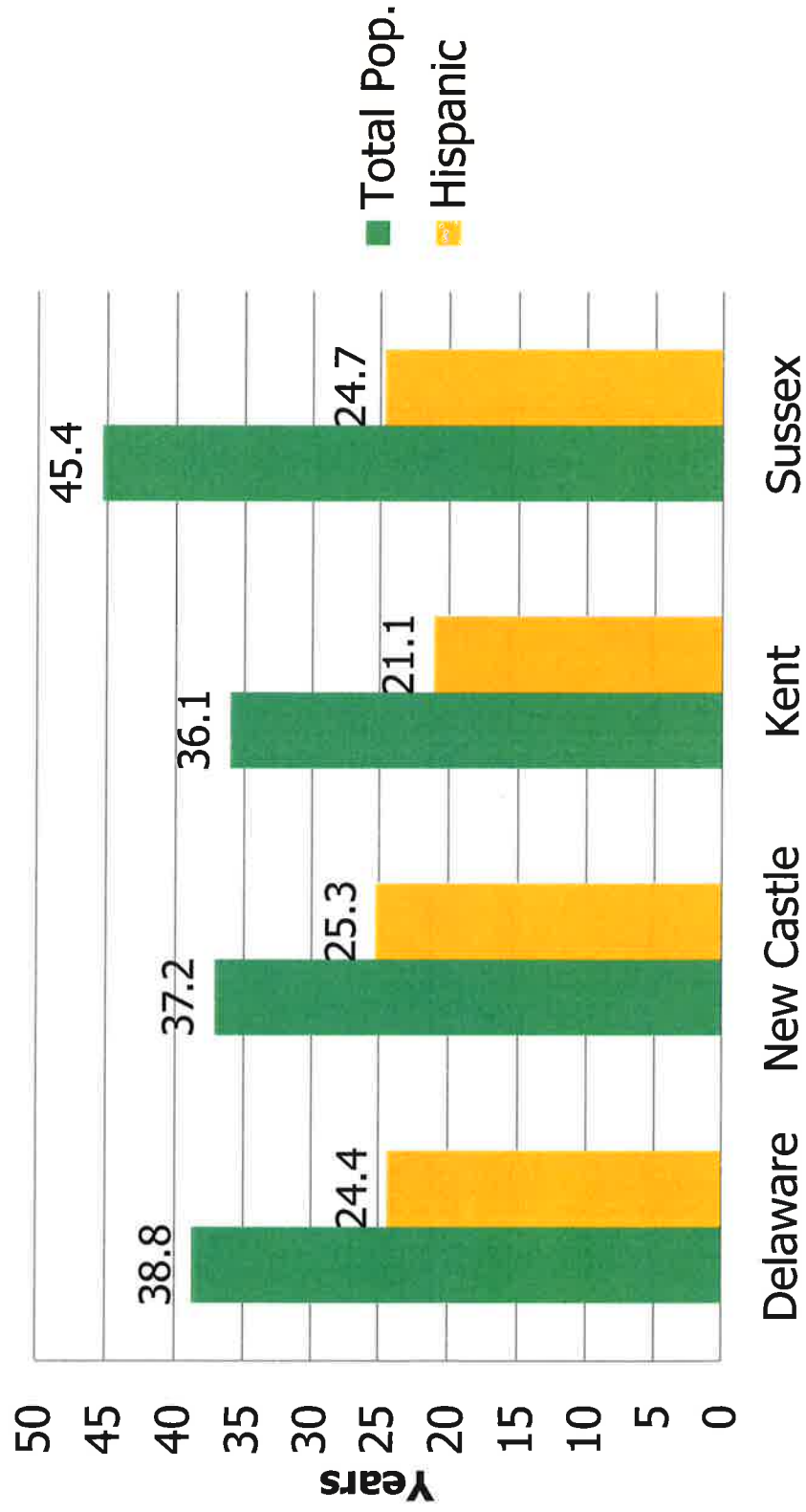




# Median Age (Years)

	Total Pop.	Hispanic Pop.
Delaware Statewide	38.8	24.4
New Castle County	37.2	25.3
Kent County	36.1	21.1
Sussex County	45.4	24.7

# Median Age Graph



# Hispanic or Latino by Type:2010

	% of Hispanic/DE
Mexican	41.4
Puerto Rican	30.8
Cuban	2.0
Dominican	2.8
Guatemalan	7.1
Salvadoran	1.7
Other Central American	2.3
South American	5.3
Other Hispanic or Latino	6.8

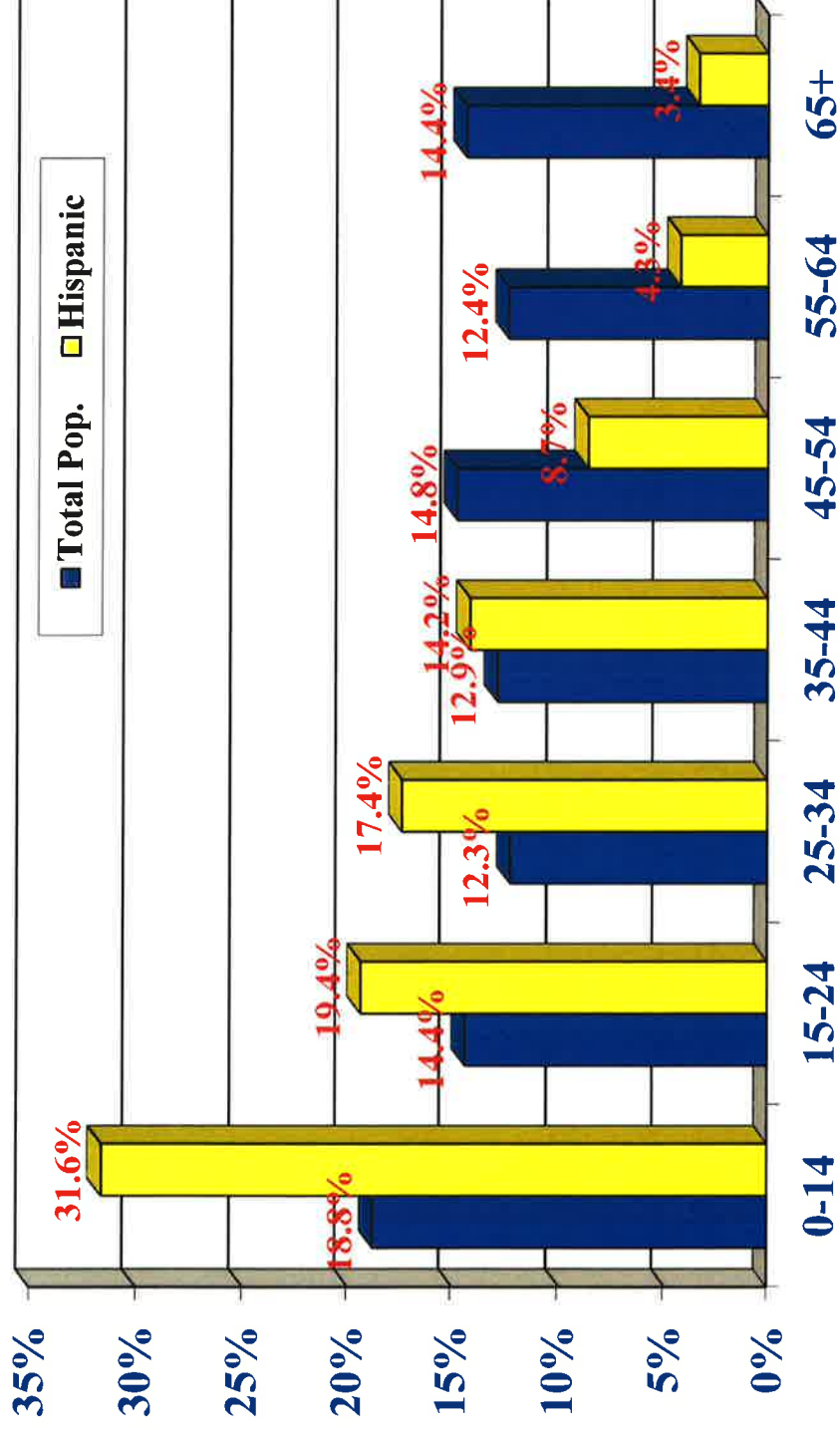
## Language Spoken at Home by Ability to Speak English – Hispanic Pop. Age 5 and Above

	Estimate
Total : Age 5 and above	64,753
Speak only English	16,574
Speak Spanish:	48,155
Speak English "Very well"	22,842
Speak English "Well"	9,941
Speak English "Not well"	9,826
Speak English "Not at all"	8,546
Speak other language	24

# Delaware Hispanic Population by Age Group

Age Group	Male	Female	Totals	%
Totals, All age	38,170	35,672	73,842	100.0
0 - 14	11,830	11,479	23,309	31.6
15 - 24	8,025	6,301	14,326	19.4
25 - 34	7,385	6,214	13,599	18.4
35 - 44	4,808	5,682	10,490	14.2
45 - 54	3,734	2,701	6,435	8.7
55 - 64	1,298	1,887	3,185	4.3
65+	1,090	1,408	2,498	3.4

# Delaware Population by Age Group (%)



Delaware Population Consortium

# Poverty Status in the Past 12 Months

## Percent below poverty level

- Delaware: 11.8%
- Hispanic population: 21.7%

**Income measures for Hispanic population are lower than that of the total Delaware population. Example: Median Household Income is 22% lower.**

# Unemployment rate

	2010	2011
Delaware	8.0	7.3
Delaware Hispanic	8.6	8.3
U.S.	9.6	8.9
U.S. Hispanic	12.5	11.5

Source: U.S. Dept. of Labor, Bureau of Labor Statistics



# Hispanic Owned Firms

- A Survey of Business Owners – conducted every five years as part of the Census Bureau’s Economic Census.
  - The most recent data is for 2007
  - 2012 data will not be available until 2015.
- For Delaware – Hispanic owned businesses grew from 879 in 2002 to 1,535 in 2007 for a growth rate of 74.6%. During this period Delaware ranked 12<sup>th</sup> among all states in the percentage of Hispanic business growth.
- Hispanic Businesses by county (2007): New Castle, 899; Kent, 286; Sussex, 350.
- Counting self-employed, the 1535 Hispanic firms represent about 3,384 jobs.
- Delaware Hispanic firms are represented in most industries. The following are the number of firms in some of the industries: Construction, 358; Services (other), 247; Health Care, 159; Admin. Support and Waste Mgt., 137; Leisure & Hospitality, 82; Transportation and Warehousing, 61; Wholesale Trade, 33; Manufacturing, 23; Information, 10. **Note: more detailed data was not available.**

# Delaware Hispanic Businesses

	<b>1992</b>	<b>1997</b>	<b>2002</b>	<b>2007</b>	<b>2012 Projected</b>	<b>2017 Projected</b>
Number of Hispanic Businesses	497	898	879	1535	1553	1832

Source: 1992 to 2007 - Census Bureau, Survey of Business Owners;  
Projections estimated by Industry, Research and Analysis, DEDO



# Educational Attainment (%)

## Delaware Statewide

	Delaware Tot.	Hispanic Pop.
<b>Educational Attainment - 25 years of age or older</b>	<b>100.0</b>	<b>100.0</b>
<b>Less than 9th grade</b>	<b>3.8</b>	<b>22.5</b>
<b>9th to 12th grade/no diploma</b>	<b>8.5</b>	<b>16.2</b>
<b>High school graduate (includes equivalency)</b>	<b>32.7</b>	<b>25.4</b>
<b>Some college, no degree</b>	<b>20.0</b>	<b>17.3</b>
<b>Associate degree</b>	<b>7.2</b>	<b>4.1</b>
<b>Bachelor's degree</b>	<b>16.5</b>	<b>7.0</b>
<b>Graduate/professional degree</b>	<b>11.3</b>	<b>7.5</b>
<b>% High school graduate or higher</b>	<b>87.7</b>	<b>61.4</b>
<b>% Bachelor's degree or higher</b>	<b>27.8</b>	<b>14.5</b>

# Educational Attainment (%)

## Counties

Educational Attainment - 25 years of age or older	Total Pop.	Hispanic Pop.
<b>New Castle</b>		
% High school graduate or higher	88.3	58.9
% Bachelor's degree or higher	33.0	15.0
<b>Kent</b>		
% High school graduate or higher	84.8	62.7
% Bachelor's degree or higher	20.1	11.4
<b>Sussex</b>		
% High school graduate or higher	86.5	55.2
% Bachelor's degree or higher	21.3	9.6

# Major Occupational Groups - Civilian Employed Population (DE Hispanic)

	Male	Female	Totals
Management, business, science, and arts:	2,027	4,024	6,051
Service Occupations	4,047	3,772	7,819
Sales and office:	2,204	3,111	5,315
Construction and Maintenance	6,594	361	6,955
Production, transportation and material moving	3,147	1,791	4,938
Totals	18,019	13,059	31,078

# Detailed Occupations – Hispanic, Delaware

Occupation	Employed
Construction Occupations	5,023
Production Occupations	3,259
Food Preparation and Serving Related Occs.	3,154
Building & Grounds, Cleaning and Maintenance Occs.	3,058
Office and Admin. Support Occs.	2,971
Sales and Related Occupations	2,344
Management Occupations	2,116
Education, Training and Library Occupations	2,067
Installation, Maintenance and Repair Occupations	1,068
Material Moving Occupations	1,056
Personal Care Occupations	811
Protective Service Occs. – Fire/Law Enforcement	749
Transportation Occupations	623
Community & Social Service Occupations	592
Health Diagnosing & Treating Practitioners & Other Technical Occs.	574
Business & Financial Occupations	387
Architecture and Engineering Occupations	139
Computer and Mathematical Occupations	79

# Summary

- The Hispanic population in Delaware represents about 8.2% of the total population.
- The estimated Hispanic population in 2010 was 73,842 up from 37,277 in 2000. This was an increase of 98.1% compared to 14.8% for total Delaware population.
- New Castle County has about two-thirds of Delaware's Hispanic population.
- The Hispanic population is much younger. Median age is just 24.4 years.
- Poverty status – one in five persons in our Hispanic community live in poverty.
- The unemployment rate is higher for the Hispanic population both in Delaware and in the U.S.
- There has been rapid growth in Delaware for Hispanic owned firms.
- Educational Attainment (25 years+) – 61.4% at least H.S. grads; 14.5% bachelor's degree or higher.
- The largest segment of Hispanic workers are in Service occupations; next highest in Construction and Maintenance.





# Exhibit 64

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7 **UNITED STATES DISTRICT COURT**  
8 **WESTERN DISTRICT OF WASHINGTON**

9 STATE OF WASHINGTON, et al.,

10 Plaintiff,

11 v.

12 DONALD TRUMP in his official capacity  
as President of the United States, et al.,

13 Defendants.

NO. 18-cv-00939

DECLARATION OF BARBARA C.  
GUINN, EXECUTIVE DEPUTY  
COMMISSIONER OF THE NEW  
YORK STATE OFFICE OF  
TEMPORARY DISABILITY  
ASSISTANCE

14 I, Barbara C. Guinn, declare as follows:

15 1. I am over the age of 18 and have personal knowledge of all the facts stated herein.

16 2. I serve as the Executive Deputy Commissioner of the New York State Office of  
17 Temporary and Disability Assistance (“OTDA”). I am the principal assistant to the  
18 Commissioner of OTDA, advise on matters of policy, and co-manage the operations of the  
19 agency with the Commissioner.

20 3. The mission of OTDA is to help vulnerable New Yorkers meet their essential  
21 needs and advance economically by providing opportunities for stable employment, housing,  
22 and nutrition. The agency’s vision is to empower New Yorkers to improve their financial  
23 security and household stability in support of strong families and communities.

24 4. OTDA was created by Chapter 436 of the Session Laws of New York for 1997  
25 as the successor to the New York State Department of Social Services. Chapter 436 transferred  
26

1 to OTDA the functions, powers duties, and obligations of the former Department of Social  
2 Services concerning public assistance programs, Supplemental Nutrition Assistance Program  
3 (“SNAP”), the Low-Income Home Energy Assistance Program (“LIHEAP”), and services  
4 provided to refugees and other non-citizens.

5 5. OTDA administers a wide range of programs that provide services and support to  
6 low-income families and individuals, including services for refugees and other non-citizens.  
7 OTDA administers many of these programs through social services districts, providing policy  
8 guidance and systems support to the districts in their implementation of OTDA programs, as  
9 well as fiscal monitoring and quality assurance of district operations and adjudication of fair  
10 hearings reviewing district determinations.

11 6. To the extent that children separated pursuant to the challenged policy would be  
12 placed with sponsors in New York, they may be eligible to receive assistance or services through  
13 one or more of the State or federally-funded programs described below, provided the children  
14 have an appropriate immigration status and/or meet other program eligibility criteria. The  
15 circumstances under which children who have been separated from their parents may qualify for  
16 assistance or services is described more fully in the paragraphs below.

17 7. Article XVII of the Constitution of the State of New York states that “the aid,  
18 care and support of the needy are public concerns and shall be provided by the state and by such  
19 of its subdivisions, and in such manner and by such means, as the legislature may from time to  
20 time determine.” It further provides that “the protection and promotion of the health of the  
21 inhabitants of the state are matters of public concern and provision therefor shall be made by the  
22 state and by such of its subdivisions and in such manner, and by such means as the legislature  
23 shall from time to time determine.” N.Y. Const., art. XVII, § 1.

24 8. OTDA is authorized to establish rules, regulations, and policies to carry out its  
25 powers and duties as established under the Social Services Law (“SSL”). SSL §  
26 20(3)(d). Among its duties is the supervision of local departments of social services and the

1 reimbursement of welfare costs, the advancement of grants of money for welfare purposes, and  
2 the administration of a discretionary fund. See SSL § 20(3). The SSL additionally provides  
3 OTDA with broad authority to establish rules, regulations, and policies upon which public  
4 assistance and care will be provided within the State. See SSL §17.

5 9. SSL § 17(a)-(b) and (j) provide, in part, that the Commissioner shall “determine the  
6 policies and principles upon which public assistance, services, and care shall be provided within the  
7 state both by the State itself and by the local governmental units . . . ,” shall “make known his policies  
8 and principles to local social services officials and to public and private institutions and welfare  
9 agencies subject to his regulatory and advisory powers . . . ,” and shall “exercise such other powers  
10 and perform such other duties as may be imposed by law.”

11 10. The Commissioner of OTDA is charged with the responsibility of taking  
12 cognizance of the interests of health and welfare of the inhabitants of the State who lack or are  
13 threatened with the deprivation of the necessities of life and of all matters pertaining thereto.  
14 SSL § 34(3)(c).

15 11. The local social services districts are charged with the duty, so long as funds are  
16 available, to provide adequately for those unable to maintain themselves, in accordance with the  
17 requirements and provisions governing assistance and related provisions of the SSL. SSL §  
18 131(1). Local social services districts “shall, whenever possible, administer such care, treatment  
19 and service as may restore such person to a condition of self-support or self-care, and shall further  
20 give such service to those liable to become destitute as may prevent the necessity of their  
21 becoming public charges.” *Id.*

22 12. In carrying out this duty, OTDA is required to respect family integrity. SSL §  
23 131(3) provides that to the extent possible, families are to be kept together and “shall not be  
24 separated for reasons of poverty alone,” and that families shall be provided services which  
25 maintain and strengthen family life. SSL § 131(3).  
26

1           13.     The Commissioner of OTDA exercises general supervision over the work of all  
2 local welfare authorities, determines the policies and principals upon which public assistance  
3 and care is provided within the State by State and local government units, and establishes  
4 regulations for the administration of public assistance and care by the State and local government  
5 units in accordance with the law. SSL § 34(3)(d); § 34(3)(f).

6           14.     Pursuant to SSL § 34(3)(f), OTDA’s Commissioner must establish regulations  
7 for the administration of public assistance and care within the State by the districts and by the  
8 State itself, in accordance with the law. Pursuant to SSL § 34(6), OTDA’s Commissioner “may  
9 exercise such additional powers and duties as may be required for the effective administration of the  
10 department and of the State system of public aid and assistance.”

11           15.     In furtherance of its constitutional and statutory obligations, OTDA supervises  
12 the administration of several programs by social services districts. These programs include  
13 Public Assistance (“PA”), which includes both Family Assistance (“FA”) and Safety Net  
14 Assistance (“SNA”); SNAP; LIHEAP; and components of the Refugee Resettlement Program.  
15 OTDA is also authorized to enter into contracts for purposes of carrying out the Response to  
16 Human Trafficking Program (“RHTP”), and the Refugee Resettlement Program. SSL Article 10-  
17 D, SSL § 358(4).

18           16.     The purpose of federally-funded FA is to provide cash assistance to eligible needy  
19 families that include a minor child living with a parent (including families where both parents  
20 are in the household) or a caretaker relative. FA operates under federal Temporary Assistance  
21 for Needy Families (“TANF”) guidelines. For New York State fiscal year 2018-2019,  
22 \$1,400,000,000 has been appropriated for FA in the New York State budget. Chapter 53 of the  
23 Session Laws of New York for 2018. The Personal Responsibility and Work Opportunity  
24 Reconciliation Act of 1996 (“PRWORA”), provides the block grant funding to states for TANF.  
25 This federal law requires states to operate a public assistance program to “provide assistance to  
26 needy families so that children may be cared for in their own homes or in the homes of

1 relatives...” The program provides continuing assistance to needy families with children under  
2 the age of 18, or under the age of 19 and regularly attending a secondary school or the equivalent  
3 level of vocational or technical training, who meet the following criteria: (1) the child is living  
4 with caretaker relatives as set forth in 18 N.Y.C.R.R. § 369.1(b); (2) the family meets the  
5 categorical eligibility requirements as set forth in 18 N.Y.C.R.R. § 369.2, including citizen or  
6 immigration status; and (3) the family meets the financial eligibility requirements as set forth in  
7 18 N.Y.C.R.R. § 352. Because federal law restricts eligibility for federally-funded benefits to  
8 non-citizens with certain forms of immigration status, one aspect of determining eligibility for  
9 FA includes assessing whether an applicant has an appropriate immigration status. Should a  
10 child who has been separated from a parent be granted asylum, or another qualified immigration  
11 status as set forth in SSL § 122, that child could receive FA, if otherwise eligible.

12 17. SNA is the New York category of PA provided to needy individuals and families  
13 who are not eligible for FA. SNA is a State-funded program for which \$555,000,000 has been  
14 appropriated in the New York State budget for State Fiscal Year 2018-2019. Chapter 53 of the  
15 Session Laws of New York for 2018. SNA provides assistance to single adults, childless  
16 couples, children living apart from any adult relative, families of persons found to be abusing  
17 drugs or alcohol, families of persons refusing drug/alcohol screening, assessment or treatment,  
18 persons who have exceeded the 60-month limit on family assistance, and certain non-citizens  
19 who are eligible for public assistance, but who are not eligible for federal reimbursement under  
20 the family assistance program or who are considered permanently residing in the United States  
21 under color of law. In determining eligibility for SNA, several factors are considered, including  
22 an applicant’s citizenship or immigration status. The immigration status requirements for SNA  
23 are less restrictive than the eligibility requirements for federally-funded programs. For example,  
24 a child who has an application for asylum pending and has received employment authorization  
25 from the United States Citizenship and Immigration Service, a child who has been granted  
26 deferred action, a child who has been paroled into the United States for less than one year, and a

1 child who is residing in the United States pursuant to an order of supervision under § 241(a)(3)  
2 of the Immigration and Nationality Act (“INA”) can receive SNA, if he or she meets program  
3 requirements and other eligibility criteria.

4 18. The purpose of the federally funded SNAP, formerly known in New York as the  
5 Food Stamp program, is to reduce hunger and malnutrition by supplementing the food  
6 purchasing of eligible low-income individuals and families, including low-income working  
7 people, senior citizens, and the disabled. For State Fiscal Year 2018-2019, \$400,000,000 has  
8 been appropriated in the New York State budget for SNAP. Chapter 53 of the Session Laws of  
9 New York for 2018. SNAP eligibility and benefit levels are based on household size, income,  
10 and other factors, including immigration status. Federal law restricts eligibility for federally-  
11 funded benefits to non-citizens with certain forms of immigration status. Should a child who  
12 has been separated from a parent be granted asylum, or another qualified immigration status, that  
13 child could receive SNAP benefits, if otherwise eligible. OTDA administers SNAP in New  
14 York. SSL §§ 95, 29. OTDA has authority to: (1) develop the required State plans to utilize the  
15 Federal Food Stamp Act of 1977, as amended, (2) accept a designation which makes  
16 supplemental nutrition assistance benefits available to eligible persons, (3) delegate or assign  
17 appropriate functions to other State departments and agencies with the approval of the Governor.  
18 SSL § 95. OTDA, with the approval of the Governor, is further authorized to accept a  
19 designation from, and act as the agent of, the duly authorized federal agency in the administration  
20 of relief and related activities affecting the welfare of individuals and communities, and the  
21 disbursement or expenditure of federal funds and commodities. SSL § 29.

22 19. LIHEAP is a federally-funded block grant program, for which \$500,000,000 has  
23 been appropriated in the New York State budget for State Fiscal Year 2018-2019. Chapter 53 of  
24 the Session Laws of New York for 2018. The block grant is administered by the U.S. Department  
25 of Health and Human Services (“HHS”), Office of Community Services (“OCS”) within the  
26 Administration for Children and Families (“ACF”). OTDA is authorized to: (1) develop and



1 submit to the Governor the LIHEAP application and plan required by federal law; (2) to take  
2 whatever action may be necessary with respect to the plan; (3) to take action that may be required  
3 to submit, implement, administer, and operate the plan; and (4) to secure for the state the benefits  
4 available under such act. SSL §97. In New York, the federal LIHEAP program is known as  
5 HEAP. The program assists eligible low-income individuals, particularly those with the lowest  
6 income who pay a high proportion of household income for home energy in meeting their  
7 immediate energy needs. Because federal law restricts eligibility for federally-funded benefits  
8 to non-citizens with certain forms of immigration status, one aspect of determining eligibility for  
9 HEAP includes assessing whether an household members have an appropriate immigration  
10 status. Households that include asylees or individuals with another qualified immigration status,  
11 including children separated from parents, who have been granted such status could receive  
12 HEAP benefits if otherwise eligible. Should a child who has been separated from a parent be  
13 granted asylum, or another qualified immigration status, that child could receive HEAP benefits,  
14 if otherwise eligible. In New York, insufficient heating and/or cooling is a health and safety  
15 concern that is especially acute in low-income households with members who are elderly,  
16 disabled, and/or include children under the age of six. Therefore, New York provides an  
17 additional benefit amount to these households.

18 20. The Refugee Resettlement Program provides services to refugees and their  
19 families to help them achieve economic and social self-sufficiency. For State Fiscal Year 2018-  
20 2019, \$26,000,000 has been appropriated in the New York State budget for the Refugee  
21 Resettlement Program. Chapter 53 of the Session Laws of New York for 2018. As a condition  
22 of receiving federal funding, states are required to submit a state plan outlining how it proposes  
23 to encourage effective refugee resettlement, to promote economic self-sufficiency as quickly as  
24 possible, and insure language training and employment services. States are also required to  
25 designate a state-employed individual who will be responsible for insuring coordination of public  
26

1 and private resources in refugee resettlement. This individual is the State Refugee Coordinator.  
2 8 U.S.C. § 1522; 45 C.F.R. Part 400.

3 21. OTDA was designated by the Governor of New York as the State agency  
4 responsible for developing the Refugee Resettlement Program State Plan, and for administering  
5 and supervising the implementation of New York's State Plan. In designating OTDA as the  
6 responsible State Agency, the Commissioner of OTDA or his/her designee, was identified as the  
7 State Coordinator, with the responsibility and authority to ensure coordination of public and  
8 private resources in refugee resettlement in the State. SSL § 358(3); SSL § 358(4).

9 22. The Refugee Resettlement Program serves certain refugees, admitted under § 207  
10 of the INA, asylees granted asylum under § 208 of the INA, Cuban or Haitian Entrants (as  
11 defined in subdivision (e) of § 501 of the Refugee Education Assistance Act of 1980), non-  
12 citizens admitted into the United States as Amerasian Immigrants as described in §  
13 402(a)(2)(A)(i)(V) of the Personal Responsibility and Work Opportunity Reconciliation Act of  
14 1996 (8 U.S.C. §1612(a)(2)(A)(v)), individuals paroled as refugees or asylees under § 212(d)(5)  
15 of the INA, Certified Trafficking Victims who have received a certification or eligibility letter  
16 from the U.S. Department of Health and Human Services, certain family members of a certified  
17 trafficking victim as described in § 101(A)(15)(T)(ii) of the INA, Iraqis and Afghans Granted  
18 Special Immigrant Status as described in § 101(a)(27) of the INA, and Lawful Permanent  
19 Residents, provided that the individual previously held one of the aforementioned statuses.  
20 Children separated from their parents who acquire one of the aforementioned statuses can receive  
21 certain Refugee Resettlement Program services, provided that they meet other program  
22 eligibility criteria.

23 23. The Refugee Resettlement Program includes a component that provides services  
24 to Unaccompanied Refugee Minors (URM). In addition to non-citizens with the above-  
25 mentioned statuses, non-citizens who have been granted Special Immigrant Juvenile Status under  
26 8 U.S.C. § 1101(a)(27)(J) or who have been granted U nonimmigrant status under §

1 101(a)(15)(U) of the INA are also eligible for services as URM. If children separated from their  
2 parents acquire one of the aforementioned statuses and are reclassified as URM by the Office of  
3 Refugee Resettlement, then the children could receive services through this component of the  
4 Refugee Resettlement Program. States that provide services to URM must develop and  
5 implement an appropriate plan for the care and supervision of, and services provided to, each  
6 unaccompanied minor, place the child in a foster home or other setting approved by the legally  
7 responsible agency and in accordance with the child's need for care and for social, health, and  
8 educational services. Case planning for unaccompanied minors must, at a minimum, address the  
9 following elements: (1) family reunification; (2) appropriate placement of the unaccompanied  
10 child in a foster home, group foster care, residential facility, supervised independent living, or  
11 other setting, as deemed appropriate in meeting the best interest and special needs if the child;  
12 (3) health screening and treatment, including provision for medical and dental examinations and  
13 for all necessary medical and dental treatment; (4) orientation, testing, and counseling to  
14 facilitate the adjustment of the child to American culture; (5) preparation for participation in  
15 American society with special emphasis upon English language instruction and occupational as  
16 well as cultural training as necessary to facilitate the child's social integration and to prepare the  
17 child for independent living and economic self-sufficiency; and (6) preservation of the child's  
18 ethnic and religious heritage. States must review the continuing appropriateness of each  
19 unaccompanied minor's living arrangement and services no less frequently than every six  
20 months. 45 C.F.R. Part 400.

21 24. OTDA enters into contracts with certain entities to provide services to human  
22 trafficking victims through the RHTP. RHTP is a State-funded program that has the purpose of  
23 assisting human trafficking victims who would not be otherwise eligible for services due to the  
24 lack of an appropriate immigration status. SSL § 483-bb. For State Fiscal Year 2018-2019,  
25 \$397,000 has been appropriated in the New York State budget for RHTP. Chapter 53 of the  
26 Session Laws of New York for 2018.

1           25.     OTDA has authority to coordinate with and assist law enforcement agencies and  
2 prosecutors to access appropriate services for human trafficking victims. SSL § 483-bb. In  
3 providing such assistance, OTDA may enter into contracts with non-government organizations  
4 for providing services to individuals who have a pending application for federal certification as  
5 a victim of a severe form of trafficking in persons as defined in § 7105 of Title 22 of the United  
6 States Code, but have not yet obtained such certification, or a person who has reported a crime  
7 to law enforcement and it reasonably appears to law enforcement that the person is such a victim.  
8 To the extent that children separated from their parents are identified as such individuals, State-  
9 funded services could be provided to them. These State-funded services may include, but are  
10 not limited to, case management, emergency temporary housing, health care, mental health  
11 counseling, drug addiction screening and treatment, language interpretation and translation  
12 services, English language instruction, job training and placement assistance, post-employment  
13 services for job retention, and services to assist the individual and any of his or her family  
14 members to establish a permanent residence in New York or the United States. SSL § 483-bb.

15           26.     The Commissioner’s ability to administer and oversee the aforementioned  
16 policies and programs have been and continues to be adversely impacted by the challenged  
17 Trump Administration policy to forcibly separate families.

18           27.     The challenged policy acts as a barrier to the release of the affected parents and  
19 children. Some of those who will be released in New York could be eligible for OTDA programs  
20 and services. Therefore, the challenged policy is preventing OTDA from carrying out its  
21 constitutional and statutorily-mandated obligations to assist needy non-citizen families.  
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1           28.    The challenged Trump Administration policy to forcibly separate families  
2 fundamentally contradicts the principles set forth in the New York State Constitution and Social  
3 Services Law.

4           I declare under penalty of perjury under the laws of the States of New York and  
5 Washington and the United States of America that the foregoing is true and correct.

6           DATED this 29<sup>th</sup> day of June, 2018 at Albany, New York.

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11 Barbara C. Guinn  
12 Executive Deputy Commissioner  
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# Exhibit 65

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7 **UNITED STATES DISTRICT COURT**  
8 **WESTERN DISTRICT OF WASHINGTON**

9 STATE OF WASHINGTON,

10 Plaintiff,

11 v.

12 THE UNITED STATES OF AMERICA, et  
al.,

13 Defendants.

NO. 2:18-CV-00939

DECLARATION OF JEAN CHEN IN  
SUPPORT OF PLAINTIFFS'  
MOTION FOR EXPEDITED  
DISCOVERY

14 I, Jean Chen, declare as follows:

15 1. I am a resident of the State of California. I am over the age of 18 and have personal  
16 knowledge of all the facts stated herein. If called as a witness, I could and would testify  
17 competently to the matters set forth below.

18 2. I am currently employed by the California Department of Social Services  
19 (CDSS), and have been since 1996. I currently serve as the Program Administrator for the  
20 department's Children's Residential Program, directing program policies and overseeing field  
21 operations statewide. Before assuming my current role, I served as the Assistant Program  
22 Administrator for the Children's Residential Program from 2012-2018.

23 3. CDSS is one of sixteen departments and offices within the California Health  
24 and Human Services Agency and is responsible for the oversight and administration of  
25 programs serving California's most vulnerable residents. Our mission is to serve, aid, and  
26

1 protect needy and vulnerable children and adults in ways that strengthen and preserve families,  
2 encourage personal responsibility, and foster independence. CDSS employs at least four  
3 thousand two hundred (4,200) individuals in forty-one offices throughout California.

4 4. I am responsible for oversight of the Children's Residential Program within the  
5 Community Care Licensing Division of CDSS.

6 **Community Care Licensing Division**

7 5. Community Care Licensing's (CCL) mission is to promote the health, safety,  
8 and quality of life of each person in community care through the administration of an effective  
9 and collaborative regulatory enforcement system. In support of this mission, CCL oversees  
10 and regulates child care facilities and residential facilities for children and adults. The  
11 Children's Residential Program is headquartered in Sacramento, California, and maintains five  
12 regional offices with seven local units throughout the State.

13 6. CCL licenses facilities used as placement options for children who are no longer  
14 under the care of a parent, and has regulatory oversight of the residential facilities for such  
15 children in California. As part of our licensing responsibilities, we license group homes, and  
16 foster family agencies that certify or approve homes to provide care of children placed in these  
17 homes. Dependent children have statutory and regulatory personal rights; rights to fair and  
18 equal access to all available services, placements, care, treatment, and benefits; and the right to  
19 not be subjected to discrimination or harassment on the basis of actual or perceived race, ethnic  
20 group identification, ancestry, national origin, color, religion, sex, sexual orientation, gender  
21 identity, mental or physical disability or HIV status. In its role, CCL is responsible for  
22 ensuring the health, safety, and welfare of children in out-of-home care facilities. CCL has  
23 three main functions: preventing predictable harm to people in care, ensuring compliance with  
24 applicable laws and regulations, and enforcing any necessary corrective actions.

25 7. CCL's oversight of children's residential placements covers all facilities used  
26 for this purpose in California, including those facilities who have contacts with the Office of



1 Refugee Resettlement (ORR) to house unaccompanied immigrant children in California.  
2 Licensing functions include complaint investigations, inspections, processing applications,  
3 providing technical assistance, and pursuing administrative actions, such as revocations of  
4 licenses and exclusions of individuals from licensed facilities. State laws and regulations favor  
5 placing children with families over congregate care.

6 8. In California, licensed facilities are subject to regular inspection by State staff to  
7 ensure compliance with standards relating to care and supervision, personal rights, criminal  
8 background checks, building and grounds, and other matters such as food and required care  
9 provider first aid and CPR training. Children's residential facilities licensed by CCL are  
10 inspected on a biennial basis, if not more frequently due to monitoring plans of correction or  
11 probationary licenses, complaint investigations, or conducting random inspections. The State,  
12 or the county in the case of a county approved home, has authority to deny, suspend, or revoke  
13 a license or approval to protect children in care. California's standards also require specified  
14 training for care providers in our licensed facilities and homes, and require sufficient staffing  
15 to meet the care and needs of the children in their care.

16 9. ORR has contracts with two types of providers licensed by CCL: group homes  
17 and foster family agencies. The foster family agencies certify or approve family homes that  
18 provide care for children placed with them. Not all group homes or foster family agencies  
19 have contracts with ORR. Group homes, and homes certified by foster family agencies are 24-  
20 hour, residential, non-medical, placement options for children. They are not allowed to be  
21 locked.

22 10. Given the recent events and hearing that children separated from their families  
23 as a result of the "zero tolerance" policy have been placed at licensed facilities in California,  
24 CCL attempted to determine which licensed group homes and foster family agencies have  
25 contracts with ORR, so that it could reinspect these facilities and homes to ensure there were  
26 no immediate health or safety concerns. CCL's present understanding of facilities under CCL's

1 jurisdiction is that there are a combination of seventeen (17) licensed group homes, and four  
2 (4) foster family agencies with ORR contracts, providing placements for approximately 51  
3 (fifty-one) minors separated from their families. CCL does not maintain a census of children  
4 detained by ORR nor maintain a list of licensed providers that have contracts with ORR. We  
5 are trying to confirm whether this is a complete inventory of ORR contracted facilities.

6 I declare under penalty of perjury under the laws of the State of California and the United  
7 States of America that the foregoing is true and correct.

8 DATED this 29<sup>th</sup> day of June, 2018 at Monterey Park, California.

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11 JEAN CHEN  
12 Program Administrator for the Children's  
13 Residential Program, Community Care  
14 Licensing Division, of the California  
15 Department of Social Services  
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# Exhibit 66

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7 **UNITED STATES DISTRICT COURT**  
8 **WESTERN DISTRICT OF WASHINGTON**

9 STATE OF WASHINGTON, *et al.*,

10 Plaintiff,

11 v.

12 DONALD TRUMP in his official capacity  
as President of the United States, *et al.*,

13 Defendants.

NO. 2:18-cv-00939

DECLARATION OF RUBEN  
REEVES IN SUPPORT OF STATES'  
MOTION FOR PRELIMINARY  
INJUNCTION

14 I, RUBEN REEVES, declare as follows:

15 1. I am over the age of 18 and have personal knowledge of all the facts stated herein.

16 2. I have been employed by the Washington State Department of Social and Health  
17 Services (DSHS) for over 21 years. Within DSHS, I am currently the acting Deputy Statewide  
18 Administrator in the Children's Administration for the Division of Licensed Resources (DLR).  
19 DLR oversees, among other things, the licensing of Washington's overnight group care facilities,  
20 including group homes and youth care centers, as well as licensing of all agencies that care for  
21 children outside their homes.

22 3. My job duties and responsibilities include providing managerial and clinical  
23 guidance and leadership to Area Administrators and Program Managers in all areas of DLR  
24 (including but not limited to child safety, family engagement, and child well-being) and for  
25 ensuring that each field office and program under their authority complies with applicable laws,  
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1 regulations and policies and procedures. I also provide extensive leadership in the strategic  
2 planning for statewide programs, initiatives and activities.

3 4. DSHS is statutorily directed to safeguard the health, safety and well-being of  
4 children by ensuring that agencies (as defined in RCW 74.15.020) meet the minimum standards  
5 for the care of children.

6 5. DSHS oversees the licensing, inspection, and monitoring of providers who care  
7 for children away from their parents. Pursuant to RCW 74.15.030, DSHS is authorized to  
8 establish minimum licensing requirements for these agencies and individuals, and to issue  
9 licenses and regulate the licensure of these childcare facilities.

10 6. Specifically, pursuant to RCW 74.15.090, any agency under RCW 74.15.020 that  
11 cares for children on a 24-hour basis away from their parents must be licensed. Under RCW  
12 74.15.080, all agencies subject to licensure “shall accord the department of social and health  
13 services ... the right of entrance and the privilege of access to and inspection of records for the  
14 purpose of determining whether or not there is compliance with [licensing  
15 requirements].” These provisions are consistent with the declared intent of chapter 74.15 RCW,  
16 which is to protect and promote the health, safety and well-being of children receiving care away  
17 from home. RCW 74.15.010. An agency is granted a group care license only after it, its staff,  
18 and property meet the licensing regulations, and all required documents are in the licensing file.  
19 WAC 388-145-1315.

20 7. The licensing requirements for group homes and overnight youth shelters are  
21 provided in ch. 388-145 WAC. Many of the licensing requirements impose requirements that  
22 are intended to promote the wellbeing of children in the care of these agencies, regardless of  
23 whether they are also in the state’s custody. For example, WAC 388-145-1350 states: “The  
24 department must have access to your facility, staff, and the children in your care at any time. You  
25 must allow us to meet privately with staff or children in your care, at our request.” This mandate  
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1 allows state licensing officers to privately inquire of the children or staff about the care delivered  
2 at the agency.

3 8. Likewise, WAC 388-145-1335(3) requires all licensed group care facilities that  
4 care for more than five children to meet state health and safety requirements. For example, they  
5 must obtain a certificate of compliance from the Washington State Department of Health and  
6 comply with fire safety requirements from the Washington State Patrol fire protection bureau.

7 9. DSHS also assesses, as part of licensure, whether the staff in group care facilities  
8 have the ability, physical health, and emotional stability necessary to meet the needs of children  
9 in the facility's care. WAC 388-145-1330(4). Before issuing a license, the DSHS licensor  
10 assesses the facility's ability to provide a safe environment for children and to provide the quality  
11 of care they need. WAC 388-145-1330(7). These licensing regulations are designed to ensure  
12 children in group care facilities are safe, healthy and protected from all forms of child abuse and  
13 neglect according to RCW 26.44.020(1) and chapter 388-15 WAC. WAC 388-145-1300.

14 10. As of today's date, there are 144 licensed group care facilities across the state.  
15 This number includes facilities that contract with the state to care for foster children who are in  
16 the state's custody, as well as state-licensed facilities that care for children who are not in the  
17 state's custody, such as those that contract with ORR to care for unaccompanied minors in  
18 ORR's custody.

19 11. I am aware that as of June 22, 2018, at least 9 children in federal ORR custody  
20 were placed in state-licensed group care facilities in Washington State following separation from  
21 their parents.

22 12. I am aware that one of these private agencies issued a statement confirming that  
23 it operates group care facilities that are currently caring for children in ORR custody who were  
24 separated from their families.

25 13. Washington State DSHS has a statutory mandate under RCW 74.13.031(2) to  
26 recruit and retain adequate placement resources for children in foster care in the state's custody.

1 If additional placement resources are deflected away from foster children in the state's custody  
2 in favor of contracts with the federal government to care for children in ORR custody, this is  
3 likely to adversely impact the Department's mandate to safeguard the health, safety, and well-  
4 being of these children.

5 I declare under penalty of perjury under the laws of the State of Washington and the  
6 United States of America that the foregoing is true and correct.

7  
8 DATED this 27<sup>th</sup> day of June, 2018 at Tacoma, Washington.

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11 RUBEN REEVES  
12 Acting Deputy Statewide Administrator  
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