



November 30, 2023

U. S. Department of State
Office of Information Programs and Services
A/GIS/IPS/RL
2201 C Street N.W., Suite B266
Washington, D.C. 20520-0000
foiarequest@state.gov

U.S. Department of Homeland Security
Privacy Office, Mail Stop 0655
2707 Martin Luther King Jr. AVE SE
Washington, DC 20528-065
foia@hq.dhs.gov

Gregory Koch
Director, Information Management Office
ATTN: FOIA/PA
Office of the Director of National Intelligence
Washington, D.C. 20511
dni-foia@dni.gov

Submitted via email

RE: Freedom of Information Act Request

Dear FOIA Officer:

The National Immigration Project of the National Lawyers Guild (“NIPNLG”), American-Arab Anti-Discrimination Committee (“ADC”), Center for Constitutional Rights (“CCR”), Muslim Advocates, and Van Der Hout LLP (collectively, “the Requesters”) submit this request pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, *et seq.* and the implementing

regulations of your agency, 6 CFR § 5.1, *et seq.*, 22 CFR § 171.10, *et seq.*, and 32 CFR 1700.1, *et seq.* As explained in more detail below, this request seeks information relating to the federal government’s monitoring of Israel’s compliance with the requirements of the Visa Waiver Program (8 U.S.C. § 1187). The Requesters seek the expedited processing of this request, pursuant to 5 U.S.C. § 552(a)(6)(E) and agency regulations, and a fee waiver, pursuant to 5 U.S.C. § 552(a)(4)(A)(iii).

I. Background

On September 26, 2023, the Department of Homeland Security (“DHS”), in consultation with the Department of State (“DOS”), designated Israel as a country that is eligible to participate in the Visa Waiver Program (“VWP”).¹ Less than three weeks before Israel’s designation, fifteen U.S. Senators wrote a letter to Secretary of State Blinken sharing their concerns that Israel is not in compliance with the “Blue is Blue” reciprocity requirements for the VWP and is not on track to meet those requirements prior to September 30, 2023.² The day after DHS’s decision to designate Israel’s eligibility under the VWP, U.S. Senators Van Hollen, Schatz, Merkley, and Welch issued a statement reiterating that “Israel has failed to meet the ‘Blue is Blue’ requirement” and that according to a memorandum of understanding between the U.S. and Israel, “Israel is expected to fully implement one system that all U.S. citizen travelers can use for purposes of visa waiver travel by May 1, 2024.”³

Despite these concerns regarding Israel’s noncompliance with the requirements of the VWP, on October 19, 2023, DHS announced “the start of visa-free travel for short term visits to the United States for eligible Israeli citizens and nationals following Israel’s admission into the [VWP].”⁴ Within weeks of Israel’s admission, the New York Times reported that “Israel is preventing Palestinian Americans from entering the country from the West Bank, an apparent violation of a recent agreement in which citizens from the United States and Israel can travel to the other nation without a visa.”⁵ The U.S. Ambassador to Israel reportedly told an Israeli national security advisor that “Israel is violating the visa waiver agreement by not allowing Palestinian Americans

¹ See Designation of Israel for the Visa Waiver Program, 88 Fed. Reg. 67,063 (Sept. 29, 2023) (to be codified at 8 C.F.R. pt. 217).

² See Senator Chris Van Hollen, “Van Hollen, Schatz Lead More Than A Dozen Colleagues In Letter To Administration On Israel’s Non-Compliance With Key Visa Waiver Program Requirements” (Sept. 8, 2023), <https://www.vanhollen.senate.gov/news/press-releases/van-hollen-schatz-lead-more-than-a-dozen-colleagues-in-letter-to-administration-on-israels-non-compliance-with-key-visa-waiver-program-requirements>.

³ See Senator Chris Van Hollen, “Van Hollen, Schatz, Merkley, Welch Release Statement On Designation Of Israel To Visa Waiver Program” (Sept. 27, 2023), <https://www.vanhollen.senate.gov/news/press-releases/van-hollen-schatz-merkley-welch-release-statement-on-designation-of-israel-to-visa-waiver-program>.

⁴ See DHS, “DHS Announces Start of Applications for Visa-Free Travel to U.S. for Eligible Israeli Travel to U.S. For Eligible Israeli Citizens and Nationals” (Oct. 19, 2023), <https://www.dhs.gov/news/2023/10/19/dhs-announces-start-applications-visa-free-travel-us-eligible-israeli-citizens-and>.

⁵ Eileen Sullivan, Edward Wong and Patrick Kingsley, “Israel Blocks Palestinian Americans From Entering From West Bank,” N.Y. TIMES (Nov. 16, 2023), <https://www.nytimes.com/2023/11/16/us/politics/israel-palestinian-americans-west-bank.html>.

from the West Bank to enter the country” following the Israeli government’s decision to close its border crossings into the West Bank.⁶

DHS is generally charged with a duty to “effectively monitor compliance of the countries participating in the program with all the requirements of the program.” See 8 U.S.C. § 1187(c)(10). Further, under 8 U.S.C. § 1187, DHS and DOS are tasked with conducting periodic evaluations of a designated country’s compliance with certain requirements of the VWP. Such evaluations must occur no less than once every two years and must include an evaluation of “the effect of each program country’s continued designation on the law enforcement and security interests of the United States;” a determination of “whether any such designation ought to be continued or terminated;” and submission of several reports to Congress.⁷

In conjunction with these periodic evaluations, the statute also requires the Director of National Intelligence (“DNI”) to provide “an independent intelligence assessment of a nominated country and member of the program” to DHS, DOS, and the Attorney General.⁸ Moreover, DHS, in consultation with DNI and DOS, are tasked with evaluating countries annually in order to “identify any program country, the admission of nationals from which under the visa waiver program under this section, [DHS] determines presents a high risk to the national security of the United States,” and must provide a report to several congressional committees “which includes an evaluation and threat assessment of each country determined to present a high risk to the national security of the United States.”⁹

II. Records Requested

The Requesters request prompt disclosure of the following records¹⁰ prepared, received, transmitted, collected, and/or maintained by DHS, DOS, and/or DNI:¹¹

- (1) All documents relating to the Visa Waiver Program Office’s standard operating procedures, protocols, and evaluation criteria to ensure compliance with the Congressionally mandated VWP designation reviews since January 1, 2022, including

⁶ Barak Ravid, “Scoop: U.S. warns Israel it’s violating visa waiver deal with West Bank closure,” AXIOS (Nov. 15, 2023), <https://www.axios.com/2023/11/16/israel-visa-waiver-palestinian-americans-us-violation>.

⁷ See 8 U.S.C. § 1187(c)(5)(A).

⁸ See 8 U.S.C. § 1187(c)(11).

⁹ See 8 U.S.C. § 1187(c)(12)(A)-(D).

¹⁰ The term “records” as used herein includes all records or communications preserved in electronic or written form, including but not limited to correspondence, documents, data, videotapes, audiotapes, emails, faxes, files, guidance, guidelines, evaluations, instructions, analyses, memoranda, agreements, notes, orders, policies, procedures, protocols, reports, rules, manuals, technical specifications, training manuals, and studies. This includes records kept in written form, electronic format on computers and/or other electronic storage devices, electronic communications and/or videotapes.

¹¹ Please exclude from this request (1) any records that are publicly available, including but not limited to those already published in the DOS or DHS FOIA Virtual Reading Rooms or Libraries (*see e.g.*, <https://www.dhs.gov/foia-library>; <https://foia.state.gov/Search/Search.aspx>); and (2) any records solely duplicating or reproducing statutes, public laws, or other public legal documents.

but not limited to the current version of the “standard operating procedures and evaluation criteria” referenced in the DHS Office of Inspector General’s November 2012 report¹²;

- (2) All current guidance, procedures, protocols, and/or policies relating to monitoring Israel’s compliance with the VWP’s statutory requirements, including but not limited to the monitoring and reporting provisions under 8 U.S.C. § 1187(c);
- (3) All guidance, procedures, protocols, and/or policies relating to monitoring Israel’s compliance with the “Blue is Blue” reciprocity requirement¹³ under the VWP, including but not limited to any such materials relating to the monitoring of:
 - a. The denial, for any reason, of any U.S. citizens’ requests to enter Israel for short-term visits;
 - b. The application of any procedures by which U.S. citizens residing in the Gaza Strip (“Gaza”) can request a permit or visa for entry into Israel for short-term visits, including for the purposes of transit and/or tourism, directly from Gaza to Israel via the Erez border crossing;¹⁴
 - c. The processing of requests for secure travel between Gaza and the Allenby Bridge border crossing made by U.S. citizens who are residents of Gaza and who otherwise were denied a permit or visa to enter Israel via the Erez border crossing;
 - d. The processing of requests to enter into Israel visa-free, through any Israeli international ports of entry, made by U.S. citizens on the Palestinian population registry for Gaza¹⁵ and those who are located outside of Gaza, including U.S. residents of Gaza;¹⁶

¹² DHS’s Visa Waiver Program Office “has developed and implemented standard operating procedures and evaluation criteria that ensure that the objectives for conducting initial and continuing designation reviews, as mandated by Congress, are met.” See DHS Office of Inspector General, “The Visa Waiver Program” at 6 (Nov. 2, 2012), https://www.oig.dhs.gov/sites/default/files/assets/Mgmt/2013/OIG_13-07_Nov12.pdf.

¹³ The Visa Waiver Program statutorily requires “reciprocal privileges to citizens and nationals of the United States.” 8 U.S.C. § 1187(a)(2)(A). The “Blue is Blue” reciprocity requirement means “equal treatment and freedom of travel for all U.S. citizens regardless of national origin, religion, or ethnicity.” See *supra* note 2.

¹⁴ “Israel will [] establish new procedures for U.S. citizens residing in Gaza to request a permit or visa for short term visits, including transit and tourism, directly from Gaza to Israel via the Erez border crossing.” See DOS, “Israel’s Commitments to Extend Reciprocal Privileges to All U.S. Citizens” (Aug. 24, 2023), <https://www.state.gov/israels-commitments-to-extend-reciprocal-privileges-to-all-u-s-citizens/>.

¹⁵ The Palestinian population registry is a computerized database of every Palestinian resident in the West Bank and the Gaza Strip. The registry is held and controlled by Israel. See Government of Israel, Coordination of Government Activities in the Territories, “Population Registry,” https://www.gov.il/en/departments/units/population_registrar_unit.

¹⁶ “Any U.S. citizen who is on the Palestinian population registry for Gaza, including a resident of Gaza, and is located outside of Gaza, will be able to seek to enter Israel visa-free through Israeli international ports of entry.” See DOS, “Israel’s Commitments to Extend Reciprocal Privileges to All U.S. Citizens” (Aug. 24, 2023), <https://www.state.gov/israels-commitments-to-extend-reciprocal-privileges-to-all-u-s-citizens/>.

- e. The application of any procedures issued on or after September 15, 2023, relating to entry into Israel of U.S. citizens on the Palestinian population registry for Gaza, including anyone residing in Gaza;
 - f. The application of any procedures issued on or after October 7, 2023, relating to entry into Israel of U.S. citizens on the Palestinian population registry for Gaza and/or the West Bank, including anyone residing in Gaza and/or the West Bank;
 - g. The use by any U.S. citizens of Israel's "Marom" travel authorization system¹⁷ for foreign visitors to Israel; and
 - h. The use by any U.S. citizens of the interim application for travel authorization to and/or through Israel that is managed by the Coordinator of Government Activities in the Territories ("COGAT") of the Israeli Ministry of Defense.
- (4) All guidance, procedures, protocols, and/or policies relating to monitoring Israel's compliance under the terms of any Memoranda of Understanding entered into between the United States and Israel anytime on or after July 1, 2023, and concerning Israel's designation under the VWP;
- (5) All evaluations, reports, data, or assessments concerning Israel's compliance with the requirements of the VWP since January 1, 2022; and
- (6) Individual-level records on each and every incident report collected through the U.S. Embassy Jerusalem Incident Reporting Form¹⁸ since July 1, 2023.
- a. This includes answers to questions (1), (2), (5), (6), (7), (8), (11), (12), and (14) on the Reporting Form.
 - b. We **do not request** personally identifying information such as name, email and birth date.
 - c. We request any records related potential follow-up conversations as referenced in question (15) on the Reporting Form.

Please provide all responsive records through the fulfillment of this FOIA request.

If under applicable law any of the information requested is considered exempt, please describe in detail the nature of the information withheld, the specific exemption or privilege upon which information is withheld, and whether portions of withheld documents containing non-exempt or non-privileged information have been provided. When you deem a portion of a record exempt, the Requesters ask that the remainder of the record be provided, as required by 5 U.S.C. §

¹⁷ "Israel will launch its new 'Marom' travel authorization system for all foreign visitors to Israel, including U.S. citizens" pursuant to a Memorandum of Understanding signed by the United States and Israel on July 19, 2023. *See* DOS, "Israel's Commitments to Extend Reciprocal Privileges to All U.S. Citizens" (Aug. 24, 2023), <https://www.state.gov/israels-commitments-to-extend-reciprocal-privileges-to-all-u-s-citizens/>.

¹⁸ *See* U.S. Embassy Jerusalem Incident Reporting Form, https://forms.office.com/pages/responsepage.aspx?id=dFDPZv5a0UimkaErISH0S3k54wgSN71Bs_xpxUGsY7dURUhMNIc5SIFHS0ZMRVIyTzBYNFpRQVoyWC4u.

552(b). We expect each agency to release all segregable portions of otherwise exempt material. The Requesters reserve the right to appeal each agency's decision to withhold any information.

III. Format of Production

Please search for responsive records regardless of format, medium, or physical characteristics, and including electronic records, *see* 5 U.S.C. § 522(a)(3)(B). We request that the records be provided in electronic format, preferably PDF (except for data records, see below) with electronically searchable text wherever possible. Furthermore, to ensure efficiency, we request all pages be properly Bates-numbered; that "Parent-child" relationships maintained, meaning that the requester must be able to identify the attachments with emails; that emails include BCC and any other hidden fields; and that any data records are produced in native format (i.e. Excel spreadsheets in Excel); with any other metadata preserved; and a glossary containing definitions of acronyms, numerical codes or terms contained documents responsive to this request, if those terms are not publicly defined.

IV. The Requesters

The National Immigration Project ("NIPNLG") is a national, nonprofit organization dedicated to providing legal assistance and support to immigrant communities and advocating on behalf of noncitizens. Members and supporters of NIPNLG include attorneys, legal workers, law students, judges, jailhouse lawyers, grassroots advocates, community organizations, and others seeking to defend and expand the rights of immigrants in the United States. NIPNLG is primarily engaged in disseminating information to the public. It is the author of four treatises on immigration law published by Thomson Reuters. NIPNLG provides technical and litigation assistance, participates in impact litigation, advocates for fair and just policies and legislation, provides legal training to the bar and the bench, and regularly publishes practice advisories and community resources on immigration law topics that are disseminated to its members and a large public audience through its website, www.nationalimmigrationproject.org.

The American-Arab Anti-Discrimination Committee ("ADC") is a national civil rights organization committed to defending and empowering the lives of people of Arab descent. ADC is a non-sectarian, non-partisan organization that was founded in 1980 by former U.S. Senator James Abourezk that conducts its work on a non-profit basis, operating as the largest Arab American grassroots organization in the United States.

The Center for Constitutional Rights ("CCR") is a non-profit, public interest legal and advocacy organization that engages in the fields of civil and international human rights. CCR's diverse issue areas include litigation and advocacy around immigration, as well as racial and ethnic profiling. One of CCR's primary activities is the publication of newsletters, know-your-rights handbooks, legal analysis of current immigration law issues, and other similar materials for public dissemination. These and other materials are available through CCR's Development, Communications, and Advocacy Departments. CCR operates a website, <http://ccrjustice.org>, which addresses the issues on which the Center works. CCR staff members often serve as sources for journalists and media outlets, including on issues related to racial justice, racial discrimination, and immigrant rights. In addition, CCR regularly issues press releases, has an

active social media presence with thousands of followers, and also issues regular email updates sent to over 50,000 supporters about developments and news pertaining to CCR’s work.

Muslim Advocates (“MA”) is a national legal advocacy and educational organization that works on the frontlines of social justice with and for Muslim and other historically marginalized communities to build community power, fight systemic oppression, and demand shared well-being. MA engages in litigation, policy advocacy, and educational outreach and regularly produces reports, white papers, and other materials to educate the public on civil-rights and social-justice matters. MA regularly files FOIA requests and publishes information obtained pursuant to such requests in a digestible, public-facing form.

Van Der Hout LLP is a nationally recognized, full-service immigration law firm representing individuals, families, and business employers in the Bay Area, throughout California, and across the country and globe in a broad range of immigration and visa concerns. Since its foundation in 1980, the firm has represented thousands of individuals, litigated cases of national significance, including many pro-bono cases, and helped clients and entities to understand U.S. Immigration law provisions and policies.

V. Expedited Processing

Expedited processing of this request is warranted because there is a “compelling need,” namely “an urgency to inform the public about an actual or alleged federal government activity” by organizations “primarily engaged in disseminating information.”¹⁹

The Requesters are renowned advocacy organizations and immigration law practitioners, primarily engaged in disseminating information to the public. *See supra* Sec. IV. There is an urgency to inform the public concerning federal government activity in connection with Israel’s compliance with the VWP’s requirements. At the time of Israel’s admission into the VWP, the federal government was aware of concerns regarding Israel’s lack of compliance with the VWP requirements. *See supra* Sec. I. Specifically, several U.S. Senators raised alarm over Israel’s “fai[ure] to meet the ‘Blue is Blue’ requirement.”²⁰ Likewise, advocacy organizations have met with federal government officials to express concerns regarding Israel’s admission into the VWP and urged the administration to ensure that Israel adheres to the principle of reciprocity prior to its admission.²¹

¹⁹ 5 U.S.C. § 552(a)(6)(E)(v)(II).

²⁰ *See* Senator Chris Van Hollen, “Van Hollen, Schatz, Merkley, Welch Release Statement On Designation Of Israel To Visa Waiver Program” (Sept. 27, 2023), <https://www.vanhollen.senate.gov/news/press-releases/van-hollen-schatz-merkley-welch-release-statement-on-designation-of-israel-to-visa-waiver-program>.

²¹ *See* American-Arab Anti-Discrimination Committee, “More than 30 organizations meet with U.S. officials to discuss Israel’s Visa Waiver Program bid” (Jun. 5, 2023), <https://adc.org/visa-waiver/>; American-Arab Anti-Discrimination Committee, “US & Israel Visa Waiver MOU Does NOT Guarantee Equal Treatment” (Jul. 26, 2023), <https://adc.org/us-israel-visa-waiver-mou-does-not-guarantee-equal-treatment/>; Ali Harb, “US Visa Waiver Program: Why Arab Americans angered by Israel’s admission,” AL JAZEERA (Sept. 28, 2023), <https://www.aljazeera.com/news/2023/9/28/us-visa-waiver-program-why-arab-americans-angered-by-israels-admission>.

Despite these concerns, DHS designated Israel into the VWP in late September and, on October 19, 2023, DHS announced the start of visa-free travel for Israeli citizens and nationals to the United States.²² This was done without apparent assurance that Israel met the requirements of the VWP. Since that time, Israel has implemented a closure of the West Bank – barring anyone, including tens of thousands of Palestinian Americans, from entering or leaving. According to recent reports, in less than two months since Israel’s designation, the U.S. Ambassador to Israel has expressed concerns to the Israeli government that Israel is violating the visa waiver agreement by not allowing Palestinian Americans from the West Bank to enter the country.²³

There is little to no information released to the public regarding Israel’s compliance with the VWP requirements and how the United States intends to monitor and verify that Israel is meeting the requirements. The records sought will assist the Requesters; other immigration law practitioners, including those representing individuals eligible for travel under the VWP; and the general public in understanding the means by which the federal government will ensure that it is meeting Congress’ directive that countries designated under the VWP meet the basic requirements of the program.

Should you determine that expedited processing is not warranted, while reserving our right to appeal that decision, the Requesters expect a response within the ten-day limit set forth under 5 U.S.C. § 552(a)(6)(E)(ii).

VI. Request for Waiver of All Costs

A. Disclosure of the Information Is in the Public Interest

The Requesters are entitled to a waiver of all costs because disclosure of the information is “. . . likely to contribute significantly to public understanding of the operations of activities of the government and is not primarily in the commercial interest of the requester.”²⁴ A fee waiver also would fulfill Congress’ intent in amending the FOIA.²⁵

Disclosure of the requested information is in the public interest. It will contribute significantly to the public understanding of government conduct, specifically how the federal government intends to monitor Israel’s compliance with the VWP requirements. Release of the records

²² See DHS, “DHS Announces Start of Applications for Visa-Free Travel to U.S. for Eligible Israeli Travel to U.S. For Eligible Israeli Citizens and Nationals” (Oct. 19, 2023), <https://www.dhs.gov/news/2023/10/19/dhs-announces-start-applications-visa-free-travel-us-eligible-israeli-citizens-and>.

²³ Barak Ravid, “Scoop: U.S. warns Israel it's violating visa waiver deal with West Bank closure,” AXIOS (Nov. 15, 2023), <https://www.axios.com/2023/11/16/israel-visa-waiver-palestinian-americans-us-violation>; Eileen Sullivan, Edward Wong and Patrick Kingsley, “Israel Blocks Palestinian Americans From Entering From West Bank,” N.Y. TIMES (Nov. 16, 2023), <https://www.nytimes.com/2023/11/16/us/politics/israel-palestinian-americans-west-bank.html>.

²⁴ 5 U.S.C. § 552(a)(4)(A)(iii).

²⁵ *Judicial Watch, Inc. v. Rossoti*, 326 F.3d 1309, 1312 (D.C. Cir. 2003) (discussing that Congress intended the FOIA to be construed broadly to favor fee waiver for noncommercial requests).

requested will shed much-needed light on the government’s policies, procedures, and practices which have already garnered significant attention from fifteen U.S. Senators representing their constituents, advocacy organizations, and the media.²⁶

B. Disclosure of the Information Is Not Primarily in the Commercial Interest of the Requesters

The Requesters are not filing this request to further any commercial interest. NIPNLG, ADC, CCR, and MA are 501(c)(3) non-profit organizations, that work both independently and collaboratively with partners across the United States to educate and disclose information to other advocacy organizations and directly impacted or interested communities, while promoting public policy change through litigation, advocacy, and support for community organizing on the ground. Van Der Hout LLP is a for-profit law firm that handles a significant amount of work on a pro bono basis. Additionally, attorneys, noncitizens, and other interested members of the public may obtain information about immigration-related issues through Van Der Hout LLP’s distribution of records, including its website, and through public and educational appearances. Van Der Hout LLP seeks the requested information for the purpose of disseminating it to organizational members, and not for the purposes of commercial gain. Any information disclosed as a result of this request will be disseminated to the public at no cost through the Requesters’ websites, listservs, social media accounts, and/or trainings.²⁷

VII. Address for Productions

Thank you for your consideration of this request. We look forward to your response to our request for expedited processing within ten (10) business days, as required by 5 U.S.C. § 552(a)(6)(E)(ii)(I). Notwithstanding our request for expedited processing, we alternatively look forward to your reply to this request within twenty (20) business days, as required by 5 U.S.C. § 552(a)(6)(A)(i). Please furnish records as soon as they are identified, preferably via email, to:

Amber Qureshi
National Immigration Project
1200 18th Street NW Suite 700
Washington, DC 20036
amber@nipnlg.org

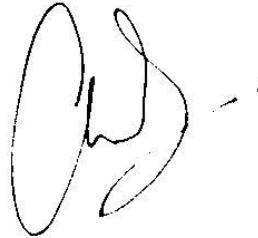
I certify that the information contained in this request is true and correct to the best of my knowledge.

²⁶ See *supra* n. 2, 3; Ali Harb, “US Visa Waiver Program: Why Arab Americans angered by Israel’s admission,” AL JAZEERA (Sept. 28, 2023), <https://www.aljazeera.com/news/2023/9/28/us-visa-waiver-program-why-arab-americans-angered-by-israels-admission>; Barak Ravid, “Scoop: Senate Dems call on Blinken to stop Israel visa waiver,” AXIOS (Sept. 8, 2023), <https://www.axios.com/2023/09/08/israel-visa-waiver-senate-democrats-blinken>; Laura Kelly, “Israeli official lauds entry into U.S. visa waiver program ahead of U.S. decision,” THE HILL (Sept. 26, 2023), <https://thehill.com/policy/international/4223170-israel-announces-us-entry-visa-waiver-program/>.

²⁷ See *Judicial Watch*, 326 F.3d at 1302 (finding a fee waiver appropriate when the requester explained, in detailed and non-conclusory terms, how and to whom it would disseminate the information it received).

If you have any questions regarding this request, please contact Amber Qureshi at amber@nipnl.org or (202)470-2082. I appreciate your cooperation and look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'A' followed by a cursive 'Q' and 'ureshi'.

Amber Qureshi
Staff Attorney
National Immigration Project