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9 Attorneys for Plaintiffs

10 Additional counsel listed on following page

11
12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **WESTERN DIVISION**

15 } Case No.: 2:25-cv-09848-AB-AS
16 Immigration Center for Women and }
17 Children, et. al., } **DECLARATION OF JILL NEDVED**
18 Plaintiffs, }
19 v. }
20 Kristi Noem, et. al, }
21 Defendants. }

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1 *Additional Counsel for Plaintiffs:*

2 LA RAZA CENTRO LEGAL
3 Stephen A. Rosenbaum (Cal. Bar No. 98634)
4 srosenbaum@law.berkeley.edu
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* *Admitted Pro Hac Vice*

DECLARATION OF JILL NEDVED

I, Jill Nedved, declare and state as follows:

1. I have personal knowledge of the facts set forth below and, if called to testify, I could and would do so competently.
2. I am an attorney who works at Gonzales, Gonzales & Gonzales Immigration Law Offices.
3. I represent Plaintiff Kenia Jackeline Merlos in her removal proceedings.
4. From June 28, 2025 to October 27, 2025, Plaintiff Kenia Jackeline Merlos was detained and in immigration custody.
5. On October 14, 2025, I represented Ms. Merlos in a removal proceeding at which the immigration judge terminated her proceedings. Despite my request that ICE release her, ICE continued to detain her pending a possible appeal to the BIA.
6. Another attorney with whom I was in direct communication filed a habeas petition on behalf of Ms. Merlos.
7. On October 27, 2025, Ms. Merlos was released from U.S. Immigration and Customs Enforcement (“ICE”) custody.
8. To date, Plaintiff Kenia Jackeline Merlos remains free from immigration custody.
9. Attached as Exhibit K to Dkt. 23-12 is a redacted true and correct copy of Kenia Jackeline Merlos’ March 8, 2024 U visa receipt notice issued by U.S. Citizenship and Immigration Services (“USCIS”), and Kenia Jackeline Merlos’ December 13, 2024 Bona Fide Determination Notice issued by USCIS.

I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing statements are true and correct. Executed this 2nd day of January, 2026, in Seattle, Washington.

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Respectfully submitted,

/s/ Jill Nedved
Jill Nedved

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12 Attorneys for Plaintiffs

13 Additional counsel listed on following page

14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**
16 **WESTERN DIVISION**

17 Immigration Center for Women and
18 Children, et. al.,
19 Plaintiffs,
20 v.
21 Kristi Noem, et. al,
22 Defendants.

23 Case No.: 2:25-cv-09848-AB-AS
24 **DECLARATION OF OSCAR MONTES**

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1 *Additional Counsel for Plaintiffs:*
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* *Admitted Pro Hac Vice*

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DECLARATION OF OSCAR MONTES

I, Oscar Montes, declare and state as follows:

1. I have personal knowledge of the facts set forth below and, if called to testify, I could and would do so competently.
2. I am a Supervising Attorney with the Immigration Center for Women and Children.
3. I represent Plaintiff Lupe A. in her pending U visa petition.
4. Attached as Exhibit A to Dkt. 23-12 is a redacted true and correct copy of Plaintiff Lupe A.'s letter of bona fide determination issued by United States Citizenship and Immigration Services ("USCIS").
5. Attached as Exhibit B to Dkt. 23-12 is a redacted true and correct copy of Plaintiff Lupe A's employment authorization card.

I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing statements are true and correct. Executed this 6th day of January, 2026, in Los Angeles, California.

Respectfully submitted,



Oscar Montes

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14 **WESTERN DIVISION**

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16 Immigration Center for Women and
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19 v.

20 Kristi Noem, et. al,

21 Defendants.

) Case No.: 2:25-cv-09848-AB-AS

) **DECLARATION OF JANA WHALLEY**

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1 *Additional Counsel for Plaintiffs:*

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* *Admitted Pro Hac Vice*

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DECLARATION OF JANA WHALLEY

I, Jana Whalley, declare and state as follows:

1. I have personal knowledge of the facts set forth below and, if called to testify, I could and would do so competently.
2. I am a Supervising Attorney with Public Counsel, a nonprofit legal services organization in Los Angeles.
3. I represented Plaintiff Camila B. in her habeas petition before the federal district court.
4. Attached as Exhibit T to Dkt. 23-12 is a redacted true and correct copy of Plaintiff Camila B.’s work authorization card; Plaintiff Camila B.’s notice of bona fide determination issued by U.S. Citizenship and Immigration Services (“USCIS”); a letter from Plaintiff Camila B.’s doctor conveying Plaintiff Camila B.’s diabetes condition and the medical implications of continuing to wear an ankle monitor; and the civil docket for Plaintiff Camila B.’s Petition for Writ of Habeas Corpus.

I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing statements are true and correct. Executed this 5th day of January, 2026, in Los Angeles, California.

Respectfully submitted,

/s/ Jana Whalley
Jana Whalley

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2 CONSTITUTIONAL LAW
3 Bardis Vakili (Cal. Bar No. 247783)
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9 Attorneys for Plaintiffs

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12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **WESTERN DIVISION**

15
16 Immigration Center for Women and
17 Children, et. al.,

18 Plaintiffs,

19 v.

20 Kristi Noem, et. al,

21 Defendants.

} Case No.: 2:25-cv-09848-AB-AS

} **DECLARATION OF CHRISTINE**
} **HOFFMAN**

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1 *Additional Counsel for Plaintiffs:*
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* *Admitted Pro Hac Vice*


DECLARATION OF CHRISTINE HOFFMAN

I, Christine Hoffman, declare and state as follows:

1. I have personal knowledge of the facts set forth below and, if called to testify, I could and would do so competently.
2. I am the Managing Attorney of Gilarranz Hoffman Law PLLC.
3. I represent Plaintiff Daniel H. in his U visa petition and removal proceedings.
4. From August 23, 2025 to December 7, 2025 Plaintiff Daniel H. was detained and in the custody of U.S. Immigration and Customs Enforcement (“ICE”).
5. On December 7, 2025, ICE removed Plaintiff Daniel H. back to his home country.
6. To date, Plaintiff Daniel H. remains in his home country.
7. Attached as Exhibit S to Dkt. 23-12 is a redacted true and correct copy of Plaintiff Daniel H.’s request for administrative closure, continuance, parole or termination of proceedings, dated October 2, 2025, and ICE’s denial of Plaintiff Daniel H.’s release, dated October 15, 2025.

I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing statements are true and correct. Executed this 29th day of December, 2025, in Oklahoma City, Oklahoma

Respectfully submitted,


/s/ Christine Hoffman
Christine Hoffman

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12 Attorneys for Plaintiffs

13 Additional counsel listed on following page

14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**
16 **WESTERN DIVISION**

17 Immigration Center for Women and
18 Children, et. al.,
19 Plaintiffs,
20 v.
21 Kristi Noem, et. al,
22 Defendants.

23 Case No.: 2:25-cv-09848-AB-AS
24 **DECLARATION OF MARC E.**
25 **CHRISTOPHER**

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1 *Additional Counsel for Plaintiffs:*

2 LA RAZA CENTRO LEGAL

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* *Admitted Pro Hac Vice*

DECLARATION OF MARC E. CHRISTOPHER

I, Marc E. Christopher, declare and state as follows:

1. I have personal knowledge of the facts set forth below and, if called to testify, I could and would do so competently.
2. I am the Managing Attorney at Christopher & De León Law Office.
3. I represent Plaintiff Yessenia Ruano as her immigration attorney.
4. Attached as Exhibit L to Dkt. 23-12 is a redacted true and correct copy of Yessenia Ruano’s Order of Supervision form noting her appearance at regular U.S. Immigration and Customs Enforcement (“ICE”) check ins, provided to me during my representation of Ms. Ruano as part of her case file.
5. Attached as Exhibit M to Dkt. 23-12 is a redacted true and correct copy of Yessenia Ruano’s receipt notice for her I-914 application for a T visa issued by U.S. Citizenship and Immigration Services (“USCIS”), provided to me during my representation of Ms. Ruano as part of her case file.
6. Attached as Exhibit N to Dkt. 23-12 is a redacted true and correct copy of Yessenia Ruano’s Warning for Failure to Depart issued by ICE, provided to me during my representation of Ms. Ruano as part of her case file.
7. Attached as Exhibit O to Dkt. 23-12 is a redacted true and correct copy of Yessenia Ruano’s February 2025 Application for a Stay of Removal noting her pending T visa, provided to me during my representation of Ms. Ruano as part of her case file.
8. Attached as Exhibit P to Dkt. 23-12 is a redacted true and correct copy of ICE’s denial of Yessenia Ruano’s Application for a Stay, provided to me during my representation of Ms. Ruano as part of her case file.
9. Attached as Exhibit Q to Dkt. 23-12 is a redacted true and correct copy of Yessenia Ruano’s Application and Request for a Stay of Removal, dated

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June 2, 2025, which I filed on her behalf, and ICE’s denial of Yessenia Ruano’s Application for a Stay.

I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing statements are true and correct. Executed this 28th day of December, 2025, in South Milwaukee, Wisconsin.

Respectfully submitted,



Marc E. Christopher

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9 Attorneys for Plaintiffs

10 Additional counsel listed on following page

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12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **WESTERN DIVISION**

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16 Immigration Center for Women and
17 Children, et. al.,
18 Plaintiffs,
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21 Defendants.

} Case No.: 2:25-cv-09848-AB-AS
DECLARATION OF KAREN CRAWFORD

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1 *Additional Counsel for Plaintiffs:*

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* *Admitted Pro Hac Vice*

DECLARATION OF KAREN CRAWFORD

I, Karen Crawford, declare and state as follows:

1. I have personal knowledge of the facts set forth below and, if called to testify, I could and would do so competently.
2. I am the Managing Attorney of the Law Office of Karen J. Crawford, PLLC.
3. I represent Plaintiff Paulo C. in his habeas and removal proceedings.
4. Attached as Exhibit D to Dkt. 23-12 is a redacted true and correct copy of Plaintiff Paulo C.’s letter of bona fide determination issued by the United States Citizenship and Immigration Services (“USCIS”); Plaintiff Paulo C.’s work authorization; and the decision of an immigration judge in Plaintiff Paulo C.’s case. I received the copy of the letter of bona fide determination and work authorization from Jonathan Levy, the attorney at the nonprofit agency American Gateways who is representing Paulo C. in his U visa application. I received the decision of the immigration judge directly from EOIR, as I am the attorney of record.
5. From July 25, 2025 to November 25, 2025, Plaintiff Paulo C. was detained and in the custody of U.S. Immigration and Customs Enforcement (“ICE”).
6. On November 24, 2025, the United States District Court of the Western District of Texas granted Plaintiff Paulo C.’s Petition for Habeas Corpus. The Texas District Court ordered ICE to release Plaintiff Paulo C. by November 25, 2025.
7. When ICE released Paulo C. pursuant to the order, they issued him an Order of Supervision. That Order of Supervision stated that he had been ordered removed on August 12, 2025, and ordering him to report to ICE in San Antonio, Texas on December 9, 2025. This Order of Supervision was incorrect. While Paulo C. had been ordered removed on August 12, 2025, the

1 Immigration Judge granted a motion to reconsider on August 29, 2025, and
2 Paulo C. no longer had a removal order because of that.

3 8. At my request, Paulo C. hired local counsel to represent him at his check in
4 on December 9, 2025. That attorney was able to advocate that ICE void the
5 in appropriately issued Order of Supervision. They issued an Order of
6 Release on Recognizance. Paulo C. will be required to continue reporting to
7 check ins with ICE under this order. Prior to his detention on July 25, 2025,
8 he was not subject to any reporting requirements.

9 9. To date, Plaintiff Paulo C. remains free from ICE custody, subject to the
10 conditions of the Order of Release on Recognizance.

11 I declare under penalty of perjury of the laws of the State of California and the
12 United States that the foregoing statements are true and correct. Executed this 29th
13 day of December, 2025, in Austin, Texas.

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15 Respectfully submitted,

16
17 /s/ Karen Crawford

18 Karen Crawford
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17 Immigration Center for Women and Children, et. al.,
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Case No.: 2:25-cv-09848-AB-AS
DECLARATION OF MARGARET MARSHALL DAVIS

1 *Additional Counsel for Plaintiffs:*

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} Case No.: 2:25-cv-09848-AB-AS
} **DECLARATION OF** [REDACTED]

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1 *Additional Counsel for Plaintiffs:*
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* *Admitted Pro Hac Vice*

DECLARATION OF [REDACTED]

I, [REDACTED], declare and state as follows:

1. I have personal knowledge of the facts set forth below and, if called to testify, I could and would do so competently.
2. I am the Managing Attorney of [REDACTED] Law Firm, PLLC.
3. I represent Plaintiff Carmen F. in her removal proceedings and her U visa petition.
4. Attached as Exhibit E to Dkt. 23-12 is a redacted true and correct copy of ICE’s grant of a stay of removal in Plaintiff Carmen F.’s case, dated November 19, 2024, and Plaintiff Carmen F.’s application for a stay of removal, dated November 14, 2024.
5. Attached as Exhibit F to Dkt. 23-12 is a redacted true and correct copy of Plaintiff Carmen F.’s Motion for a Stay of Removal, dated July 14, 2025.
6. Attached as Exhibit G to Dkt. 23-12 is a redacted true and correct copy of Department of Homeland Security’s Opposition to Plaintiff Carmen F.’s Motion for a Stay of Removal, dated July 23, 2025.
7. Attached as Exhibit H to Dkt. 23-12 is a redacted true and correct copy of Plaintiff Carmen F.’s request for parole from Immigration and Customs Enforcement (“ICE”) Family Detention.
8. Attached as Exhibit I to Dkt. 23-12 is a redacted true and correct copy of Plaintiff Carmen F.’s request for humanitarian parole.
9. Attached as Exhibit J to Dkt. 23-12 is a redacted true and correct copy of a Decision from the Board of Immigration Appeals in Plaintiff Carmen F.’s case, dated July 31, 2025.

1 I declare under penalty of perjury of the laws of the State of California and the
2 United States that the foregoing statements are true and correct. Executed this 29
3 day of December, 2025, in Houston, Texas.

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5 Respectfully submitted,

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9 Attorneys for Plaintiffs

10 Additional counsel listed on following page

11
12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **WESTERN DIVISION**

15 } Case No.: 2:25-cv-09848-AB-AS
16 Immigration Center for Women and }
17 Children, et. al., } **DECLARATION OF STEPHEN ROIGER**
18 Plaintiffs, }
19 v. }
20 Kristi Noem, et. al, }
21 Defendants. }

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* *Admitted Pro Hac Vice*

DECLARATION OF STEPHEN ROIGER

I, Stephen Roiger, declare and state as follows:

1. I have personal knowledge of the facts set forth below and if called to testify, I could and would do so competently.
2. My name is Stephen Roiger, and I am an attorney at Goss Law, which is located at 333 Washington Ave N, #208, Minneapolis, MN 55401. I have been working at Goss Law for over 11 years.
3. Goss Law primarily handles immigration law cases, including removal defense, survivor benefits cases (VAWA, SIJ and U visas), and family-based petitions and applications.
4. Goss Law represents dozens of U visa petitioners, and several SIJS and VAWA self-petitioners.
5. Our office has represented immigrant survivors seeking survivor-based protections since it was founded.
6. These types of survivor cases are critical to the lives of our clients. Prior to the introduction and mainstreaming of the U visa process, many of our clients shied away from calling the police. I have personally heard from dozens of clients and potential clients who the victims of serious criminal activity who refused to report the crimes out of fear. Thanks to the U visa program, and outreach from the local police forces, that hesitancy has largely been removed and more crimes targeting immigrant communities are being reported.
7. In 2024 and before, ICE's victim-centered policy protected our clients who were survivors of abuse, trafficking, and crime. Many of our clients felt secure enough to report the harm they experienced or were able to leave their abuser because of immigrant survivor protections like the U visa, T visa, and VAWA.
8. Since February 2025, some of our clients with pending U, T, or VAWA petitions have had closed cases reopened. In 2024 and before, our clients with pending U, T, or VAWA petitions who were not in proceedings and applied for U, T, or VAWA relief, or who had their proceedings administratively closed or stayed based on their U, T, or VAWA petitions pending adjudication, did not have to be concerned about having their case reopened before their petition could be reviewed by USCIS. Absent exceptional circumstances, we were not forced to represent our clients in complex removal proceedings unless and until their petition had been denied.


9. Since February 2025, many of our clients with pending U, T, or VAWA petitions have been required to attend additional or more frequent ICE check ins and have been placed under increased monitoring or supervision conditions. In 2024 and before, clients with pending survivor-based petitions attended infrequent, routine ICE check ins without incident; now I would be worried about sending someone there without counsel.
10. Since February 2025, our clients with pending U, T, or VAWA petitions are more fearful of detention and deportation, and have begun to avoid simple things like picking up their own children from school.
11. Since February 2025, we have seen a drop in the number of people who request our assistance to apply for a survivor-based benefit.
12. Since February 2025, our clients express more fear of police and in some cases, some clients have chosen not to report harm or not to pursue a restraining order out of fear of arrest, detention, deportation, or because they are more vulnerable to retaliation by the perpetrator without protection from deportation. Discouraging crime victims from reporting these things cannot possibly be good for public safety.
13. Our office represents a client in their VAWA petition for a U/T visa, which was filed on November 25, 2024. The U visa was based on a robbery and beating at gunpoint during a carjacking – exactly the type of case contemplated when the U visa was created. The client in question is a derivative on his wife’s U visa case, which also includes their (now) ten-year-old son.
14. The family had originally been encountered at the border in June 2021, and were placed in removal proceedings. They filed a pro se I-589 in 2023 prior to retaining counsel.
15. On December 30, 2024, our office was able to administratively close the removal proceedings for all three of them. Notably, the court cited the Pending U-visa as the reason for administrative closure.
16. On June 3, 2025, ICE filed a motion to reopen against only the derivative husband. The government’s motion noted the December 20, 2024 closure of the case, but simply stated that he had not obtained “any new lawful permanent status”.
17. My office filed a strenuous opposition, noting repeatedly that the case involved a U visa applicant. Despite this, the IJ ordered that the case be reopened on June 26, 2025.

18. Shortly after reopening the case, on August 20, 2025, the court issued an Order contemplating pretermission of the case. My office filed a response on September 29, 2025, presenting additional evidence for the I-589, but also reiterating his status as a U visa derivative applicant.
19. The IJ ordered pretermission and removal on November 6, 2025. We have now filed an appeal of that decision to the BIA. Notably, the IJ's decision completely ignored the pending U visa application that had formed the basis of the earlier administrative closure of the case.
20. Before 2025, I never had a client ordered removed while having an active U visa case. I had also never had a client have their case pretermitted with an active U visa application.
21. Based on my experience representing people with these types of cases, in 2024, my client would not have had their case reopened. At the very least, even if it was reopened it would have been placed on a status docket pending a decision from USCIS.
22. This new policy has no rational basis. It makes our communities less safe by discouraging people from seeking help from law enforcement, and by removing victims who would be able to testify against their attackers. It harms survivors by taking away their support systems – either directly by deporting the primary applicants, or like here where the government has ordered the victim's spouse removed from the country. These are people with no criminal record of their own, so there is no argument for public safety on those grounds either. It is cruelty for the sake of cruelty, and at the expense of making us less safe.

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

Date

11/24/25



Stephen Roiger

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13 Additional counsel listed on following page

14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**
16 **WESTERN DIVISION**

17 Immigration Center for Women and
18 Children, et. al.,

19 Plaintiffs,

20 v.

21 Kristi Noem, et. al,

22 Defendants.

Case No.: 2:25-cv-09848-AB-AS

**DECLARATION OF MARGUERITE
ÉVELYNE MARTY**

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* *Admitted Pro Hac Vice*

DECLARATION OF ATTORNEY MARGUERITE ÉVELYNE MARTY, ESQ,

I, Marguerite É. Marty, Esq. declare and state as follows:

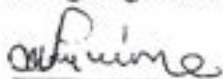
1. My name is Marguerite Évelyne Marty, and I submit this declaration in support of Immigration Center for Women and Children vs. Noem, Case No 2:25-cv-009848.
2. I am an Immigration Attorney at the Law Office of Marguerite Marty, PLLC, located at 108 W.39th Street, Ste 300, New York, NY 10018. I am licensed in the state of New York.
3. Over one-third of my practice is dedicated to representing survivors of crimes including domestic violence, sexual assault, and child abuse in applications for U Nonimmigrant Status and VAWA self-petitions. I also represent unaccompanied children in their applications for relief.

Summary of Detained Client with Pending Application for U Nonimmigrant Status

4. My office represents Mr. SNM in his I-918a petition for U2 Nonimmigrant Status filed on March 31, 2025. Mr. SNM is the dependent applicant on his spouse's I-918 petition for U1 Nonimmigrant Status. Their minor US citizen daughter was a victim of a sex crime, and her parents cooperated with the investigation and prosecution of the crime.
5. Mr. SNM has been under an I-220B Order of Supervised Release by the US Department of Homeland Security since April 12, 2019. Pursuant to this Order, Mr. SNM was required to report to his local ICE ERO office every six months to one year.
6. Mr. SNM never failed to appear at his reporting dates. He also has no criminal record, has been married for 19 years, and is the father of three children, the youngest of whom is 14 years old and is a US citizen.
7. At his check-in appointment at the Newark, NJ ICE ERO Field Office on April 22, 2025, Mr. SNM appeared with undersigned counsel who provided the ICE officers with proof of his filing for U nonimmigrant status.
8. Then, at his latest check-in appointment at the ICE ERO Newark, NJ field office on October 21, 2025, Mr. SNM was taken into custody by the ICE officers and transferred to Delaney Hall in Newark, NJ. The ICE Officers did not make any allegation of flight risk or danger to the public. The officers provided no explanation for the arrest other than stating that under current policy, ICE is detaining all individuals with prior orders of removal, regardless of whether they have a pending application for a victim-based immigration benefit, such as U status. In my experience, before February 2025, ICE refrained from detaining clients on supervision with pending U visa petitions who attended their check ins.

9. During his detention, his daughter, who is still dealing with the trauma from her assault, has suffered from stress and anxiety and misses her father. She has been crying daily and is unable to sleep at night. The family is also struggling financially due to the loss of Mr. SNM's income.
10. On October 23, 2025, Undersigned Counsel filed an I-246 Application for a Stay of Deportation or Removal with the ICE ERO Field Office in Newark, NJ, based on his pending request for U nonimmigrant status, which includes a request for deferred action. On November 23, 2025, Undersigned Counsel received a notification from ICE that the I-246 Application for a Stay was denied.
12. In my experience, before February 2025, ICE routinely granted stays of removal for clients with pending U visa applications. If a client was detained, ICE routinely requested expedited prima facie review from USCIS.
13. Based on my experience representing hundreds of U visa and VAWA self-petitioners (including dozens of applicants with ICE reporting requirements or with final orders of removal like Mr. SNM), I believe that before February 2025, Mr. SNM would have attended his ICE check-in without incident and ICE would have refrained from detaining or deporting him until and unless USCIS denied his bona fide determination. If ICE had allowed him to continue pursuing his U visa on an order of supervision, it would have protected both him and his survivor daughter, keeping his family and her support network together, encouraging him and others to report crimes, and permitting him to access the protections Congress intended.

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



Marguerite É. Marty, Esq.

Dated: 11/25/2025

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14 **WESTERN DIVISION**

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16 Immigration Center for Women and
17 Children, et. al.,

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19 v.

20 Kristi Noem, et. al,

21 Defendants.

} Case No.: 2:25-cv-09848-AB-AS

} **DECLARATION OF KEVIN ALEJANDRO**
} **SARABIA**

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* *Admitted Pro Hac Vice*

**DECLARATION OF KEVIN ALEJANDRO SARABIA FOR LOYOLA'S BINATIONAL
MIGRATION CLINIC**

I, Kevin Alejandro Sarabia, declare and state as follows:

1. I have personal knowledge of the facts set forth below, and if called to testify, I could and would do so competently.
2. My name is Kevin Alejandro Sarabia, and I am an attorney at Loyola's Immigrant Justice Clinic (LIJC), under the Binational Migration Advocacy Project. LIJC is located at 919 Albany Street, Los Angeles, CA 90015. I have been working at LIJC for 1 year and 3 months.
3. The Loyola Immigrant Justice Clinic (LIJC) is a community-based collaboration of Loyola Law School, Loyola Marymount University, Homeboy Industries Inc., and Dolores Mission Church. LIJC's mission is to advance the rights of the immigrant population in East Los Angeles through direct legal services, education, and community empowerment while teaching law students effective immigrants' rights lawyering skills in a real-world setting.
4. LIJC focuses on providing representation to individuals who are unable to obtain immigration legal services elsewhere, with an emphasis on immigrants with certain immigration and criminal complications who reside in the East Los Angeles area. Given the population we serve, we specialize in humanitarian forms of relief such as U visas, T visas, VAWA, and SIJS.
5. In 2024, LIJC started the Binational Migration Advocacy Project. The goal of this initiative is to replicate our community-based model to provide free immigration legal services to migrants and deportees in Mexico, specifically, Tijuana and Guadalajara. Our geographic focus is strategic, as these two cities form part of the migration corridor for individuals seeking to resettle in California, and are also where deportees and returnees from the Southern California region often relocate due to their community ties. In approximately September of 2024, our clinic started offering services in various migrant shelters in Tijuana to serve this client population.
6. In my current role, I oversee our clinical work in the Tijuana region. In this role, I often coordinate trips to Tijuana to provide services to migrant shelters. The people who often participate in these trips are the following: Loyola clinical law students, LIJC Director Helena Marissa Montes, Clinical Directors and fellows from other law schools, Mexican attorneys, and Mexican clinical students.
7. During our visits to Tijuana, we provide free legal services for people in migrant shelters. During these visits, we host Know Your Rights Workshop geared at informing shelter staff and tenants as to the current standing of immigration policy. At the end of these workshops, we offer free legal consultations to anyone interested in understanding the

**DECLARATION OF KEVIN ALEJANDRO SARABIA FOR LOYOLA'S BINATIONAL
MIGRATION CLINIC**

status of their immigration cases and their ability to enter the United States in the future. Our goal is to provide free, accurate information to those who seek our assistance.

8. Before February 2025, our clinic hosted six service trips to the Tijuana region. We went approximately three times between September and December of 2024, and approximately three times in January 2025. We increased the number of visits in January, anticipating the policy changes that would be taking place with the arrival of the Trump Administration.
9. At each visit, we conducted approximately 25-60 intakes with individuals who were present. During those visits, I, nor anyone who participated in our programming, ever encountered an individual who had been deported with deferred action based on a pending U or T visa or a VAWA self-petition.
10. Since February 2025, when ICE Directive 11005.4 rescinded ICE Directive 11005.3 (Using a Victim-Centered Approach with Noncitizen Crime Victim), our clinic has visited Tijuana approximately 5 times.
11. I have personally attended all these trips. At each visit, we conduct approximately 15-25 intakes with individuals who were present at the shelters. On these trips, we encountered people who had been deported while their U visa, T visa, or VAWA self-petition was pending. Among these, we encountered a couple of individuals who had been deported with deferred action based on a U visa.
12. The majority of the individuals we interviewed on these trips were unrepresented in their removal proceedings.
13. Based on their collective stories, it is evident that the lack of access to counsel left them highly vulnerable to deportation despite having pending humanitarian benefits. Some of those we interviewed shared that they were detained and coerced into signing documents that they did not understand, which then resulted in their deportation. They also shared that they were not aware of their right to file a stay despite having pending petitions or that they could file a habeas as a result of being denied bond.
14. Based on our training and experience, we believe that it is more common for unrepresented individuals to be deported under the new policy than for represented individuals to be deported under the new policy. People's lack of access to counsel empowers immigration agents to violate the law, knowing there will be no accountability.
15. We also understand it is less likely that unrepresented individuals will have an opportunity to tell their stories or will be identified by advocates.

DECLARATION OF KEVIN ALEJANDRO SARABIA FOR LOYOLA'S BINATIONAL
MIGRATION CLINIC

16. Before February 2025, I had never come across individuals who were deported with pending survivor-based benefits. This is now something I expect to encounter each time I conduct intakes with deported individuals.
17. As an immigration attorney, it is devastating to see victims of violent crimes, who assisted law enforcement in the United States, and who are deserving and entitled to a fair adjudication of their protection, be placed in an even more precarious situation. Many of the people I encounter tell me how they are revictimized after their deportation because they are left with no resources in a country they no longer recognize as home. It is heartbreaking to hear that many of these individuals were torn apart from their communities and families in the United States. It is difficult to advise people because I worry there is no viable recourse for them, as ICE ignored their right to due process and their grant of deferred action.
18. This has extreme, irreparable consequences for the individuals we meet. Some individuals were detained for weeks or months. During this time, they could not provide for or be with their families and endured grueling conditions of detention. Many of the people we met had to choose between separating from their families and tearing their families from their communities in the U.S. by bringing them to Mexico when they were deported. Individuals lost their livelihoods, homes, communities, educations, businesses, and lives in the U.S.
19. One individual I interviewed was a victim of a felonious assault in the United States. He made the courageous decision to report to the police and assist in the investigation of this violent crime. Subsequently, he filed for a U visa and received a bona fide determination. One day in June of 2025, this individual was stopped by masked men who started inquiring about his immigration status. He showed these masked men his work permit and explained that he had a bona fide determination, but the masked men took his work permit away, detained him, and turned him over to ICE. This individual was then deported to Mexico. He has three sons: one son is 22 years old and served in the US Marines, another son is 20 years old and suffers from anxiety and depression, and lastly, he has a 10-year-old son whom he cared for. In Mexico, he now faces persecution from the cartels. The hometown where he was from has a strong presence of the cartel Nueva Generacion. Since the cartel found out that his sons were sending him money, they came after him to extort him. He was then forced to flee his hometown to Tijuana, where I provided legal consultation.
20. Another individual, whom we recently served in Guadalajara, had an approved I-360 for his VAWA application. Multiple people beat this individual at his spouse's command. He obtained a restraining order from his spouse and subsequently filed for VAWA. In October 2025, he went to a scheduled ICE check-in and was told that he was going to be deported. He explained that he had an open case, but he was immediately detained in a basement and deported to Mexico in less than 24 hours. If placed in removal proceedings, this individual could have applied for cancellation of removal. He first

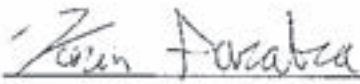
DECLARATION OF KEVIN ALEJANDRO SARABIA FOR LOYOLA'S BINATIONAL
MIGRATION CLINIC

entered the United States in the 90s and had been a resident of Los Angeles for about 25 years. As a single father, he cared for his 15-year-old United States Citizen son, who suffers from a brain tumor, epilepsy, and ADHD. In Mexico, this individual has struggled to obtain a job to continue supporting his son, despite having experience as an electrician, plumber, and construction worker. Out of desperation, he tried to obtain informal work by calling a number on a billboard by a convenience store. When he went to this job offer, they attempted to take him to Michoacan, a region in Mexico, notorious for people being taken to and kidnapped by the cartels. He fled the scene and is now scared that these people will find and harm him.

21. Since February 2025, I have seen a significant increase in the number of people deported with pending survivor-based benefits. Many of them had deferred action when they were deported, something that was nearly unheard of just a year ago when we started doing work in Mexico. The rescission of protections for U, T, and VAWA petitioners has had a devastating effect on the individuals we meet and their family members in the United States, many of whom are United States citizens.
22. Based on our services being spread throughout months, the shelters we service have voiced that a lot of people come in and out of their shelter without receiving legal consultations. We also serve dedicated shelters, and there are many more active shelters in Tijuana that we have not had contact with. Based on this, we believe we have only scratched the surface of the number of people affected by the rescission of ICE Directive 11005.3, and that this is likely happening to many more individuals who have not had the opportunity to share their stories.

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

Date: December 3, 2025


NAME

DECLARATION OF KEVIN ALEJANDRO SARABIA FOR LOYOLA'S BINATIONAL
MIGRATION CLINIC

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10 Additional counsel listed on following page

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13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **WESTERN DIVISION**

15 } Case No.: 2:25-cv-09848-AB-AS
16 Immigration Center for Women and }
17 Children, et. al., } **DECLARATION OF ALYSSA REED**
18 Plaintiffs, }
19 v. }
20 Kristi Noem, et. al, }
21 Defendants. }

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* *Admitted Pro Hac Vice*

Declaration of Attorney Alyssa Reed

I, Alyssa Reed, declare as follows:

Background

1. My name is Alyssa Reed, and I submit this declaration in support of Immigration Center for Women and Children v. Noem, Case no. 2:25-cv-009848.
2. I am an attorney and owner of Reed Immigration, LLC in Denver, Colorado. I've been practicing immigration law for over 19 years and am the former Chair of the Colorado Chapter of the American Immigration Lawyers Association.
3. I represent immigrants in primarily family and humanitarian-based applications with a heavy emphasis on U Nonimmigrant Status and VAWA self-petitions.


Summary of Client with Pending U Nonimmigrant Status and Deferred Action who was Removed from the United States

4. I represent RAM, a native and citizen of Mexico. He had previously been removed from the United States in 2005, but had returned in 2020. He has no criminal history aside from minor traffic violations.
5. RAM was the victim of an attempted murder in San Antonio, Texas in 2022. He was stabbed multiple times in the neck and arm and almost lost his life. He reported the crime and cooperated in the investigation. The perpetrator fled and there is a warrant for his arrest. RAM has been cooperating fully with both the police and prosecutors.
6. The San Antonio Police Department certified RAM as the victim of attempted murder who is being cooperative in the investigation, and therefore RAM was eligible to apply for U nonimmigrant status, which he did on May 15, 2023.
7. On April 2, 2025, USCIS determined that RAM's U visa petition is bona fide and issued him deferred action and employment authorization.
8. On November 15, 2025, RAM states he was buying food at a food truck late at night in San Antonio when he was suddenly detained by ICE agents. He states he provided the ICE agents his employment authorization card and social security card as evidence of his deferred action and pending U visa petition, but the agents said they did not care about those documents and doubted how it was even possible that he had them. The agents allowed him to make one phone call to his sister, but they hung up the phone on him after less than two minutes. They did not permit him to call me, his attorney.
9. RAM's sister notified me of his detention on Monday, November 17. That same day I sent an email to ICE in San Antonio including my G-28, evidence of his deferred action, and asking them to delay his removal. I did not receive any response. I also began preparing an application for a stay of removal, however we were not able to submit it as he was removed just hours later, early in the morning of November 18.

10. RAM states that he was shuffled around to several different detention centers before being removed to Mexico on November 18. Because of this, I was unable to locate him or contact him prior to his removal.
11. Now that he has been removed to Mexico, he will be unable to participate in any judicial process related to his victimization if and when his attacker is apprehended. He is also facing a roughly 20-year wait for a U visa, and will be unable to return to the U.S. in the meantime.
12. Before January 2025, in my experience, clients in RAM's position would not have been detained after showing ICE agents proof of their work authorization. In my experience, had RAM been detained before January 2025, ICE agents would have responded to my communication and released him. In my experience, ICE would have further granted him a stay of removal, allowing him time for his U visa to be finally adjudicated.
13. Before January 2025, I felt confident advising my clients with U BFD deferred action that they would be safe from detention or removal unless extenuating circumstances arose, such as a criminal arrest. I have represented approximately 1000 U, T, and VAWA petitioners over the past 19 years and have never had a client with RAM's case posture (someone with no serious criminal history who possesses deferred action) detained or removed from U.S. before.

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

Date: December 11, 2025



Signature

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12 Attorneys for Plaintiffs

13 Additional counsel listed on following page

14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**
16 **WESTERN DIVISION**

17 Immigration Center for Women and Children, et. al.,
18 Plaintiffs,
19 v.
20 Kristi Noem, et. al,
21 Defendants.

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Case No.: 2:25-cv-09848-AB-AS
**DECLARATION OF ALIZABETH
NEWMAN**

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* *Admitted Pro Hac Vice*

DECLARATION OF ALIZABETH NEWMAN FOR SEPA MUJER, INC. (SERVICES FOR THE ADVANCEMENT OF WOMEN)

I, Elizabeth Newman, declare and state as follows:

1. I have personal knowledge of the facts set forth below and if called to testify, I could and would do so competently.
2. My name is Elizabeth Newman, and I am the Interim Legal Director at SEPA Mujer, Inc., which is located at 110 N. Ocean Ave, Patchogue, NY 11772. I have been working at SEPA Mujer for 11 months in the position and worked as a Clinical Professor at CUNY School of Law for over 20 years prior to that. I am also the Founder of SEPA Mujer.
3. SEPA Mujer, Services for the advancement of women, is a nonprofit organization that aims to foster robust civic engagement, elevate women's and girls' leadership, and cultivate a gender-inclusive environment. Our dedicated efforts aim to empower individuals to actively participate in shaping their communities while championing and amplifying the voices of women and girls in leadership roles. We are committed to breaking down barriers for immigrant women and girls and creating an inclusive space where all genders can thrive, collaborate, and drive positive change. The legal work focuses on protection the most vulnerable in our community including U/T/VAWA cases, court advocacy and accompaniment.
4. SEPA Mujer represents approximately 100 U visa petitioners, approximately 2 T visa petitioners, and approximately 5 VAWA self-petitioners.
5. Our office has represented immigrant survivors seeking survivor-based protections for over 30 years.
6. The relief that Congress has made available to victims of gender violence and other crimes has been invaluable to our community members. Because immigrants are more vulnerable due to lack of familiarity with systems and customs, language barriers and lack of resources, they can more easily fall prey to unscrupulous people who will take advantage of them. The protections of the U, T, and VAWA have allowed our clients to leave dangerous situations, and to work with law enforcement when they would otherwise have been too frightened to do so.
7. In 2024 and before, ICE's victim-centered policy protected our clients who were survivors of abuse, trafficking, and crime. Many of our clients felt secure enough to report the harm they experienced or were able to leave their abuser because of immigrant survivor protections like the U visa, T visa, and VAWA.

Impact of new policies on our clients:

8. Since February 2025, one of our clients with a pending U petition was detained, in spite of the fact that she was in valid deferred action status. In 2024 and before, none of our clients with pending U, T, or VAWA petitions were detained and we could advise our clients that applying for a U or T visa or submitting a VAWA self-petition would protect them. In 2024 and before, we had never had a client detained who was in valid deferred action status.
9. Since February 2025, one of our clients with pending U visa petition was deported, in spite of the fact that she was in valid deferred action status. In 2024 and before, none of

our clients with pending U, T, or VAWA petitions were deported without any review of their petition, and we could advise our clients that applying for a U or T visa or submitting a VAWA self-petition would protect them. In 2024 and before, we had never had a client deported who was in valid deferred action status.

10. Since February 2025, our clients with pending U, T, or VAWA petitions are more fearful of detention and deportation, and many clients have been reluctant to file for status to which they qualify and should be able to provide them a path to legalization. Many who are in the midst of processes after filing petitions are concerned that showing up at an appointment would lead not to furthering their petitions, but to their detention or removal. Some have expressed being fearful of leaving the house or picking up their children at school. Some have expressed fear of going to the office for scheduled appointment.
11. Since February 2025, we have seen a drop in the number of people who request our assistance to apply for a survivor-based benefit.
12. Since February 2025, our clients express more fear of police and some clients have chosen not to report harm or not to pursue a restraining order out of fear of arrest, detention, deportation, or because they are more vulnerable to retaliation by the perpetrator without protection from deportation. Clients have expressed fear of going to the police or the court and have needed staff accompaniment in order to follow through.

RXA's story:

13. Our office represents a client in their VAWA petition where her abusive husband did not show up for the interview. She explained her situation that she was planning to file a VAWA petition and asked to reschedule her interview. Instead, she received a letter stating that she was being placed in removal proceedings.
14. In another case, we determined that a client qualified for a U visa and began the process of collecting information and preparing the affidavit. Hearing of all the ICE actions and understanding that the filing of a U visa, even a strong case, would take years and that the ICE administration would not afford any protection to the applicant for years, the individual decided not to file the U visa and to leave the US.
15. The most egregious instance of harm to a client because of ICE's drastic change in policy was the case of our client, RXA. Our office represents a client, RXA, in her petition for a U visa, which was filed on August 14, 2023.
16. *Life & basis of visa petition:* RXA is an indigenous Guatemalan woman who survived domestic abuse both in leaving Guatemala and then again in the United States. This time however, she found assistance. She reported the crime, worked with law enforcement and received an order of protection. RXA has 3 children, one who is a legal permanent resident, and two younger children, 4 and 12, who are US citizens and who were living with her and in her care.
17. *Grant of deferred action:* On January 4, 2025, USCIS issued RXA a Bonafide Determination letter and a grant of deferred action. USCIS also issued our client employment authorization pursuant to her deferred action valid from 1/04/2025-1/03/2029. RXA has never received any notice of revocation of deferred action and to our knowledge, nothing has caused her to no longer be eligible for deferred action since it was granted.

18. *Enforcement under the new policy:* This client received a notice to appear for biometrics on October 31, 2025. At the Hauppauge Application Support Center. When she complied, she was detained by ICE. She was told that she had an outstanding order of removal that she did not know about.
19. Client RXA was quickly sent out of New York to a detention Center in Louisiana. This was extremely traumatic to her and devastating to her husband and children.
20. Her information never showed up in the ICE Locator, but because RXA called her family, we learned where she was.
21. At the moment of attending her biometrics appointment RXA showed her documents to the ICE agents who told her that having a U visa pending meant very little and would have no impact on their actions to detain and remove her.
22. One of SEPA Mujer's attorneys did send her letter of representation to the Southern Louisiana Detention Center and requested to know who was the agent in charge. Her efforts to identify and reach the agent were unsuccessful. Either no one answered the telephone, or upon picking up the phone, they hung up, or when she did speak with someone, they promised that the appropriate agent would be in touch with her. This never happened.
23. The attorney also emailed a request that the officer in charge be in touch with the attorney to give information about the charges against her, and to request a Reasonable Fear interview because our client expressed being afraid to return to Guatemala. No one ever got in touch with the attorney.
24. Before 2025, I never had a client arrested, detained or removed while in deferred action status; ICE routinely agreed to administratively close cases for clients with deferred action or pending U/T/V petitions.
25. I have been working on VAWA self-petitions and U visas for over 25 years. In the past, I could reassure victims that they could feel comfortable telling their stories and seeking protection from the police or USCIS. Minor immigration violations could be waived in the context of supporting victims of crime. This year, there has been a radical shift in immigration policy and procedures that completely undermine the protections so thoughtfully passed by Congress with bipartisan support. No longer are crime victims empowered to seek protection, to rely on police or immigration authorities. No longer are petitions that are being adjudicated providing support for those courageous enough to speak out against their abusers. These policy changes have had a terrible chilling effect on victims, allowing them to fall prey to unscrupulous abusers, which flies in the face of the exact reason that the Violence Against Women Act (VAWA) and the Victims of Trafficking and Violence Protection Act (VTVPA) were passed. These drastic changes in the last year have undermined 30 years of Congressional work and precedent. They have created severely unsafe conditions for victims of gender violence and they are bolstering the power of abusers to prey on unprotected immigrants. All women are less safe in such an environment.

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

A handwritten signature in black ink that reads "Alizabeth Newman". The signature is written in a cursive style with a large, stylized initial 'A'.

Alizabeth Newman

Date: December 15, 2025

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16 Immigration Center for Women and
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20 Kristi Noem, et. al,

21 Defendants.

} Case No.: 2:25-cv-09848-AB-AS

} **DECLARATION OF DEBORAH MAS**
} **CABRERA**

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* *Admitted Pro Hac Vice*

DECLARATION OF DEBORAH MAS CABRERA

I, Deborah Mas Cabrera, pursuant to 28 U.S.C. § 1746, declare and state as follows:

1. I have personal knowledge of the facts set forth below and if called to testify, I could and would do so competently.

Background

2. My name is Deborah Mas Cabrera, and I am Managing Attorney at the South Texas Pro Bono Asylum Representation Project (ProBAR), which is headquartered in Harlingen, Texas. ProBAR is a project of the American Bar Association (ABA).
3. I have been working at ProBAR for two and a half years. In total, I have worked as an immigration attorney for nine years representing clients before U.S. Citizenship and Immigration Services (USCIS) and the Executive Office for Immigration Review (EOIR), including survivors of crime, domestic violence and human trafficking.
4. I make this declaration based on personal knowledge and information made known to me in the course of my professional experience, and I make this declaration in my personal capacity and not on behalf of ProBAR or the ABA.
5. ProBAR was founded in 1989 as a pro bono project to provide access to counsel and due process to detained migrants and asylum seekers in the Rio Grande Valley region of South Texas. ProBAR opened a satellite office in Houston, Texas, in 2023. ProBAR provides legal information, pro se assistance, and representation to immigrants and asylum seekers who reside in the Rio Grande Valley community and to those detained at the Port Isabel Detention Center and the El Valle Detention Center. The satellite office in Houston provides legal assistance to children and families in the Houston area.

ProBAR's Representation of Clients with U, T, or VAWA Petitions

6. ProBAR attorneys represent immigrant survivors seeking survivor-based protections for decades. ProBAR attorneys currently represent 37 clients with pending U, T or VAWA petitions across its Harlingen and Houston offices.
7. ProBAR U, T, and VAWA clients have been victimized, often repeatedly, in some of the worst ways imaginable.
8. Prior to the recent changes in policy, Immigration and Customs Enforcement's (ICE) victim-centered policy protected ProBAR's clients who were survivors of abuse, trafficking, and crime. ProBAR clients with pending survivor-based applications were not detained absent exceptional circumstances, and clients with deferred action status could feel safe to live, work, and travel peacefully in the community. ProBAR attorneys often advised clients who had experienced violence at home, at school or in the community that reporting to law enforcement officials would not result in adverse immigration consequences, and would protect them from detention and deportation as they rebuilt their lives. Many of ProBAR's clients felt secure enough to report the harm they experienced as immigrant survivors based on protections like the U visa, T visa, and VAWA.

9. Since February 2025, I have seen how ICE's changes in policy have negatively impacted immigrant survivors, including those who have been granted deferred action by USCIS. I am aware of at least two individuals with pending U visa petitions who have been detained despite having deferred action. These two cases are explained below with pseudonyms for the protection of their privacy.

ProBAR Client "Maria"

10. One ProBAR client, "Maria" was detained in November while attending a routing ICE check-in, despite her USCIS Bona Fide Determination and grant of Deferred Action.
11. Maria is a single mother with young children. One of her children was the victim of sexual assault committed by a family member. Maria helped her child report the abuse to the authorities and assisted the district attorney's office in prosecuting the crime committed against her child. Maria filed for U visa status as an indirect victim of the crime.
12. In 2025, USCIS issued Maria a Bona Fide Determination and grant of deferred action. USCIS also issued her employment authorization pursuant to the grant of deferred action. Maria has never received any notice of revocation of deferred action, and, to my knowledge, nothing has caused her to become ineligible for deferred action since it was granted.
13. Maria was originally ordered removed in 2020. She was later detained and placed in withholding only proceedings after receiving a positive reasonable fear finding due to harm she experienced in her country of origin. Her eligibility for a U visa allowed her to have her removal proceedings dismissed as an act of prosecutorial discretion. She was released from detention and placed on an Order of Supervision. She attended regular check-ins with ICE for years without issue and dutifully complied with the conditions of release.
14. In November 2025, Maria was detained at her scheduled ICE check-in. I attended this check-in with the client and was present as ICE officials took her into custody. Even though I alerted ICE officials of Maria's deferred action status and showed them copies of USCIS's decision to grant her a bona fide determination, the officer insisted the client did not have legal status and that a grant of deferred action from USCIS did not prohibit ICE from enforcing immigration laws. I also informed ICE officials that Maria is the primary caretaker of her U.S. citizen children. Despite my request for detailed reasoning that justified her detention or consideration of other alternatives to detention, ICE officials denied any alternatives that would have allowed the client to avoid being taken into custody. ICE officials did not provide further reasoning as to why this act of enforcement needed to happen at this time. Maria was taken into custody just a few days before Thanksgiving. Because of her re-detention, Maria faced the possibility of imminent detention, deportation and separation from her U.S. citizen children. Due to the stress of detention and separation from her children, Maria opted to take voluntary departure and return to her country of origin.

ProBAR Client "Laura"

15. In September 2025, ProBAR staff met "Laura," a single mother with minor children and a survivor of domestic violence, after she was detained in ICE custody at the El Valle Detention Facility. Laura did not have an attorney for her removal proceedings, and

ProBAR provided legal orientation and limited assistance while she was detained. ProBAR learned Laura had a U visa petition that had been pending with USCIS since 2017. In 2023, Laura was issued a Deferred Action letter by USCIS. ProBAR assisted her in drafting and submitting a Motion for Administrative Closure of her removal proceedings given her deferred action status and the likelihood that her petition for a U visa would soon be granted. Despite this, the Motion for Administrative Closure was denied, and Laura was ordered removed from the United States.

Recent Changes to Treatment of U, T, and VAWA Petitioners

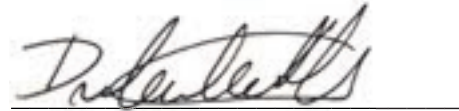
16. Before 2025, none of ProBAR's clients with pending U, T, or VAWA petitions were deported without any review of their petition, and I could advise clients that applying for a U or T visa or submitting a VAWA self-petition would protect them. ProBAR had never had a client deported who was in valid deferred action status.
17. Before 2025, I had never seen any individual with a pending U, T, or VAWA application be detained or ordered removed absent exceptional circumstances.
18. Based on my experience representing U, T, and VAWA petitioners, in 2024, those clients with pending petitions that had Orders of Supervision would not have been taken into custody, nor would someone with a pending U, T, or VAWA petition be ordered removed.
19. Since February 2025, two of ProBAR's clients with pending U, T, or VAWA petitions have had closed cases re-calendared with the immigration court. Until recently, ProBAR clients with pending U, T, or VAWA petitions who were not in court proceedings and applied for U, T, or VAWA relief, or who had their proceedings administratively closed or stayed based on their U, T, or VAWA petitions pending adjudication, did not have to be concerned about having their case reopened before their petition could be reviewed by USCIS. Normally, absent exceptional circumstances, ProBAR did not have to represent survivor clients in removal proceedings unless and until their petition had been denied.
20. A number of ProBAR clients with pending U, T, or VAWA self-petitions remain in removal proceedings and are no longer able to request prosecutorial discretion in the form of dismissal or administrative closure while their petitions are pending. This places them at risk of detention and removal even though they have applied for protection from such removal through available legal means.
21. Notably, in May 2023, ProBAR identified and assisted around 43 survivors and family members of a terrible crime, in which a man drove his SUV into a bus stop where a large group of migrants were waiting. This incident killed eight individuals and injured several more. These survivors lacked legal status in the United States and are in removal proceedings, after being paroled into the United States, but their willingness to come forward with their eyewitness accounts helped the District Attorney's Office prosecute the horrific crime. Many of these survivors now have pending U visa petitions that should protect them but still face the possibility of deportation due to the recent change in policy. The existence of the U visa as an avenue for relief and the protections that were previously offered to survivors with pending petitions made them feel confident to come forward and assist law enforcement.
22. Since February 2025, ProBAR clients with pending U, T, or VAWA petitions are more fearful of detention and deportation because of increased immigration enforcement

activity in Houston and the Rio Grande Valley coupled with the increase of local law enforcement cooperation with immigration authorities.

23. Since February 2025, ProBAR clients have expressed significant fear of interacting with police or any other government official, even if they are not immigration officials. This fear makes them hesitant to come forward to report their victimization and pursue relief through U, T, or VAWA self-petitions. The change in policy is an abrupt departure from the longstanding Department of Homeland Security policy and approach towards survivors of crime, trafficking, and domestic violence. The change contributes to the atmosphere of anxiety and fear many immigrant survivors currently live in and makes it less likely that they will pursue the protections from deportation that are available to them. This change hinders the ability of legal service providers to represent these clients effectively, as ICE moves to detain and remove U/T/VAWA clients who have been granted deferred action and should not be detained or removed.

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

Date 12/15/2025



Deborah Mas Cabrera

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} Case No.: 2:25-cv-09848-AB-AS

} **DECLARATION OF ANGELIQUE**
} **MONTANO**

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* *Admitted Pro Hac Vice*

DECLARATION OF ANGELIQUE MONTANO

I, Angelique Montano, declare and state as follows:

1. I have personal knowledge of the facts set forth below and if called to testify, I could and would do so competently.
2. My name is Angelique Montano, and I am the Managing Attorney at the Law Office Angelique Montano, PLLC, which is located at 12600 N. Featherwood Drive, Houston, TX 77034. I have been working at our firm since 2018.
3. We are a small immigration law firm with clients from all parts of the world, with different cultural and educational backgrounds. We represent foreign nationals in a variety of immigration matters, including U visa petitions.
4. The Law Office of Angelique Montano PLLC represents approximately 30 U visa petitioners.
5. Our office has represented immigrant survivors seeking survivor-based protections for approximately 8 years.
6. U visa benefits are vital to our clients, as they not only open up pathways to U.S. residency for some who otherwise would not be eligible, but also because for many victims of crime, especially those without legal status, fear of deportation can prevent them from seeking help. The U visa offers them protection from being removed from the U.S. while they cooperate with authorities. Additionally, victims of crime often need medical, psychological, and social services to recover. U visa holders can access services that are critical for their healing and rebuilding of their lives. This includes therapy, shelter, legal assistance, and support groups. Lastly, in some cases, U visa holders can also petition to have certain family members (spouses, children, and in some cases, parents) join them in the U.S. This ensures that families can stay together while they recover and rebuild their lives.
7. Prior to 2025, ICE's victim-centered policies protected our clients who were survivors of abuse, trafficking, and crime. Many of our clients felt secure enough to report the harm they experienced or were able to leave their abuser because of immigrant survivor protections like the U visa, T visa, and VAWA.
8. Since February 2025, two of our clients with pending U visa petition have been detained, including one who was in valid deferred action status. In 2024 and before, none of our clients with pending U visa petitions were detained absent exceptional circumstances, and we could advise our clients that applying for a U visa or submitting a VAWA self-petition would protect them. In 2024 and before, we had never had a client detained who was in valid deferred action status.
9. Since February 2025, one of our clients with pending U visa petitions has been deported – he arrived in Honduras on Tuesday, December 9, 2025. He had an outstanding removal order; however, his U visa petition was filed with the USCIS on August 26, 2025. An ICE official in the detention center, prior to his recent removal, incorrectly stated that once our client received his Deferred Action EAD, which the officer said had already been approved according to the information he had, our client would be able to return to the United States. Therefore, in reliance of this statement, our client agreed to be removed without any challenge, as he understood that it would be just a matter of

months before he could return to the United States. In 2024 and before, none of our clients with pending U visa petitions were deported without any review of their petition, and we could advise our clients that applying for a U visa would protect them.

10. Since February 2025, our clients with pending U visa petitions are more fearful of detention and deportation.
11. Since February 2025, our clients express more fear of police and in some cases, clients have chosen not to report harm or not to pursue a restraining order out of fear of arrest, detention, deportation, or because they are more vulnerable to retaliation by the perpetrator without protection from deportation.

EXAMPLE OF ONE OF OUR CLIENTS:

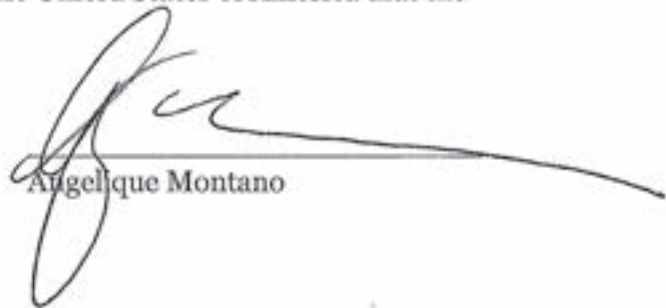
12. Our office represents a client in his petition for a U visa, which was filed on 06/14/2022.
13. *Basis of visa petition & Client's Life:* Our client is a victim of a qualifying criminal activity, specifically aggravated robbery with a deadly weapon (felonious assault). See Texas Penal Code 29.03. On February 25, 2020, he was assaulted by two suspects with a gun at his restaurant in Houston, Texas. That day, while working at his restaurant in Houston, Texas, two young male individuals began insulting and damaging the property outside of the restaurant. One of the young individuals pointed a gun at our client, the restaurant owner. Our client's instinct was to wrestle the gun out of the individual's hand and he was able to get the gun from the young man. The staff at our client's restaurant saw the whole altercation and were able to contact the Houston Police Department (HPD). Our client provided the police officers a report about the assault and cooperated with them, including providing detailed descriptions of the two young male assailants. While our client continues to suffer emotionally and psychologically as a result of the aggravated assault, he nevertheless continues to be willing to give any information to the Houston Police Department or any other law enforcement agency to assist in any investigations. Our client is married to a Lawful Permanent Resident, and is the father of three U.S. citizen children, including one who served several years in the U.S. Marine Corps and who plans to re-enlist in January 2026. Our client is not only a business owner but contributes to the local community in a variety of ways, including active church membership.
14. On 02/13/2025, USCIS issued a BFD and grant of deferred action to our client. USCIS also issued our client employment authorization pursuant to his deferred action. Our client has never received any notice of revocation of deferred action and to our knowledge, nothing has caused him to no longer be eligible for deferred action since it was granted.
15. On 12/01/2025, while driving on a highway in south Texas, our client stopped at the US Customs & Border Protection (CBP) checkpoint and presented his valid work permit card (issued through the U visa BFD and Deferred Action). However, he was detained by CBP and transferred to an ICE detention center, where he remains at this time. He was shocked to be detained by ICE since he has Deferred Action and a BFD work permit and had assumed that such benefits would protect him from being detained and/or deported from the United States while he awaits the final adjudication of his U visa petition. He and his family, including his LPR wife and USC children, are devastated by this detention and the fact that he is detained in a facility hours away from his home in Houston have made this more difficult. His detention and uncertain future also affect

his restaurant and all that depend on that business for its livelihood, as well as its customers.

16. Since he is detained hours from Houston and our office is not able to represent him in detention or any removal proceedings, he obtained local legal counsel to represent him on these matters. However, we understand that ICE has been alerted to the fact that he has a pending U visa petition, with a BFD and Deferred Action and EAD card.
17. Before 2025, I never had a client arrested/ detained/ removed while in U visa Deferred Action status and ICE routinely agreed to administratively close cases for clients with deferred action/ pending U visa or VAWA petitions.
18. Based on my experience representing U/T/V petitioners, under prior policies before 2025, our client would not have been arrested or he would have been promptly released once ICE was notified of their petition/ deferred action status.
19. Thus, the change in policy appears to be a sharp departure from the victim/survivor protections afforded to such clients in the past. These individuals have already suffered at the hands of violent criminals in the United States and these individuals have been courageous enough to come forward to report such crimes to law enforcement.
20. Yet, now our U visa clients have no guarantee, much less reliance, that the U.S. government will protect them as understood based on the purpose of the U visa petition -
a) To strengthen law enforcement's ability to detect, investigate, and prosecute serious crimes, such as domestic violence, sexual assault, and human trafficking; b) To encourage victims to report crimes committed against them and participate in the investigation and prosecution of those crimes, even if victims lack lawful immigration status; and c) To offer protections to victims of qualifying crimes in keeping with the humanitarian interests of the United States. See U Visa Law Enforcement Resource Guide 2019, published by the U.S. Department of Homeland Security.
21. Thus, this policy change has not only impacted my clients but has also affected how I represent and counsel clients as to what sort of protections (or risks) result from filing U visa petitions.

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

Date 12-16-25



Angelique Montano

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10 Additional counsel listed on following page

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12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **WESTERN DIVISION**

15
16 Immigration Center for Women and
17 Children, et. al.,

18 Plaintiffs,

19 v.

20 Kristi Noem, et. al,

21 Defendants.

} Case No.: 2:25-cv-09848-AB-AS

} **DECLARATION OF KATHRINE**
} **ELIZABETH REYNOLDS**

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* *Admitted Pro Hac Vice*

DECLARATION OF KATHRINE ELIZABETH REYNOLDS

I, Kathrine Elizabeth Reynolds, declare and state as follows:

Background

1. My name is Kathrine Elizabeth Reynolds, and I submit this declaration in support of *Immigration Center for Women and Children v. Noem*, Case No. 2:25-cv-009848.
2. I am a staff attorney in the Immigration Unit at MetroWest Legal Services, located at 1671 Worcester Road, Suite 203, Framingham, MA 01701.
3. I am an attorney licensed to practice law in the Commonwealth of Massachusetts. I exclusively represent immigrant survivors of domestic violence and sexual assault in their immigration matters.

Summary of Detention of Client with Pending VAWA Self-Petition and Adjustment of Status Application

4. I represent Ms. MM in her immigration matters. On April 6, 2023, we filed a Self-Petition under the Violence Against Women Act (“VAWA Self-Petition”) on behalf of Ms. MM, based on the battery and extreme cruelty Ms. MM suffered from her abusive US Citizen husband. On June 26, 2023, we filed an Application for Adjustment of Status on behalf of Ms. MM. As of the date of this declaration, these applications are pending before the United States Citizenship and Immigration Services (“USCIS”).
5. On September 20, 2023, USCIS, made a *Prima Facie Determination*, determining that Ms. MM met the basic eligibility requirements for self-petitioning under the Violence Against Women Act.
6. On November 10, 2025, Ms. MM’s abusive ex-husband (“Abuser”) showed up at Ms. MM’s home demanding to see their shared three (3)-year-old United States Citizen daughter (“Child”). As it was not Abuser’s parenting time and Child was sick, Ms. MM asked Abuser to leave her home. Abuser called the police and falsely accused Ms. MM of pushing him to the ground. Ms. MM was arrested and charged with Assault and Battery on a Family or Household Member under Massachusetts General Laws c. 265 s. 13M. Ms. MM has not been convicted of the Assault and Battery charge and anticipates that the charge will be dismissed.

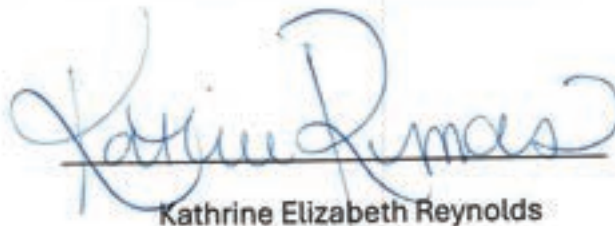
7. On November 11, 2025, Ms. MM appeared at Framingham District Court in Framingham, MA for arraignment on the Assault and Battery Charge. Ms. MM also filled out a complaint for a protection order against Abuser before she left the courthouse.
8. On her way out of the courthouse Ms. MM was detained by Immigration and Customs Enforcement (“ICE”) and brought to the ICE Boston Field Office in Burlington, MA.
9. Ms. MM was detained for two (2) days, until November 13, 2025, at the ICE Boston Field Office, which is not a detention center and where she had no access to bedding, showers, or personal hygiene products.
10. On November 12, 2025, Counsel for Ms. MM filed a Petition for a Writ of *Habeus Corpus* with the United States District Court, District of Massachusetts, requesting Ms. MM’s immediate release.
11. On November 13, 2025, ICE agreed to release Ms. MM from the ICE Boston Field Office on her own recognizance. Ms. MM was placed on Alternatives to Detention (“ATD”) and fitted with an ankle monitor, which she is still required to wear as of the date of this declaration.

Impact of Ms. MM’s Detention

12. Ms. MM’s detention by ICE and the aftermath of it has been very distressing to her and to her family and has opened Ms. MM up to continued abuse and harassment from Abuser.
13. On November 17, 2025, Abuser filed an emergency motion for short order with the Middlesex County Probate & Family Court in Massachusetts, requesting sole custody of their Child due to Ms. MM’s detention by ICE.
14. Ms. MM has been forced to appear in Probate Court to oppose Abuser’s emergency motion for sole custody of Child. Abuser has threatened to remove Child from the United States, should he be granted sole custody. These types of threats and abuse of the legal system are consistent with the years of abuse Ms. MM has suffered from Abuser.

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

Date: November 21, 2025



Kathrine Elizabeth Reynolds

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16 Immigration Center for Women and
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20 Kristi Noem, et. al,

21 Defendants.

} Case No.: 2:25-cv-09848-AB-AS

} **DECLARATION OF SCOTT E. BELLGRAU**

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* *Admitted Pro Hac Vice*

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DECLARATION OF ATTORNEY SCOTT E. BELLGRAU

I, Scott E. Bellgrau, declare and state as follows:

Background

1. My name is Scott E. Bellgrau, and I submit this declaration in support of Immigration Center for Women and Children v. Noem, Case No. 2:25-cv-009848.
2. I am an immigration attorney at the Law Offices of Scott E. Bellgrau, P.C., 124 W. Diversey Ave., Elmhurst, IL 60126.
3. I am licensed to practice law in the state of Illinois.

Summary of Detained Client with Pending Application for U nonimmigrant Status and Deferred Action

4. Our office represents Mrs. P.L. and her spouse, Mr. A.Z., in their petition for U Nonimmigrant Status. Their petitions were filed on May 8, 2023. Ms. P.L. is the victim of domestic battery who cooperated with the Chicago Police Department in the investigation against her abuser. Mr. A.Z. filed an I-918A as a qualifying family member of a U-1 recipient.
5. In the spring of 2025, both parties were granted deferred action after USCIS determined that their I-918's were bona fide.
6. On October 30, 2025, Mr. A.Z. was detained in Arkansas at a truck weight station. He was held for close to one week (without the filing of any criminal charges) and then turned over to ICE. Mr. A.Z. presented his bona fide determination and his employment authorization card but was still detained.
7. Mr. A.Z. filed a Motion for Bond Redetermination Hearing. The

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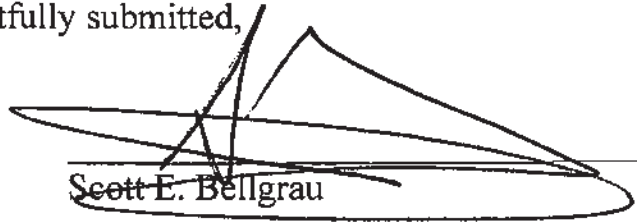
immigration judge denied his request for a bond holding that Mr. A.Z. was an extreme flight risk because his deferred action grant and U visa filing were speculative.

8. Mr. A.Z. remains in ICE custody and in removal proceedings. He and his family have retained separate counsel to pursue a Writ of Habeas. I continue to represent Mr. A.Z. in his pending removal proceedings.

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

Dated: 12/22/2025

Respectfully submitted,



Scott E. Bellgrau

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13 Additional counsel listed on following page

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15 **CENTRAL DISTRICT OF CALIFORNIA**
16 **WESTERN DIVISION**

17 Immigration Center for Women and
18 Children, et. al.,

19 Plaintiffs,

20 v.

21 Kristi Noem, et. al,

22 Defendants.

Case No.: 2:25-cv-09848-AB-AS

DECLARATION OF JESUS E. SAUCEDO

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* *Admitted Pro Hac Vice*

1 **DECLARATION OF JESUS E. SAUCEDO**

2 I, Jesus E. Saucedo, declare and state as follows:

3
4 **A. Background Information**

- 5
- 6 1. I have personal knowledge of the facts set forth below and if called to testify,
7 I could and would do so competently.
 - 8 2. My name is Jesus E. Saucedo, and I am an associate attorney at the Jessica
9 Dominguez Immigration Law Group, which is located at 3771 Cahuenga
10 Blvd, Studio City, CA 91604. I have been working at the Jessica Dominguez
11 Immigration Law Group for twelve years.
 - 12 3. The Jessica Dominguez Immigration Law Group is a private law office that
13 specializes in immigration and naturalization law.
 - 14 4. The Jessica Dominguez Immigration Law Group represents approximately
15 forty U visa petitioners and approximately twenty VAWA self-petitioners.
 - 16 5. Our office has represented immigrant survivors seeking survivor- based
17 protections for approximately twenty years.
 - 18 6. U and VAWA applications are important to our clients because they protect
19 the clients and increase the likelihood that they trust and work with the
20 authorities.
 - 21 7. Prior to 2025, ICE’s victim-centered policies protected our clients who were
22 survivors of abuse, trafficking, and crime. Because of immigrant survivor
23 protections like the U visa and VAWA, many of our clients felt secure
24 enough to report the harm they experienced or were able to leave their
25 abuser.

26 **B. Recent Action by ICE**

- 27
- 28 8. Since February 2025, one of our clients with a pending VAWA petition has
been detained. He had a Notice of Prima Facie Case, which indicates that his

1 VAWA petition established a prima facie case for eligibility. In 2024 and
2 before, none of our clients with pending U, T, or VAWA petitions were
3 detained absent exceptional circumstances, and we could advise our clients
4 that applying for a U or T visa or submitting a VAWA self-petition would
5 protect them. In 2024 and before, we never had a client detained who was in
6 valid deferred action status.

7 9. Since February 2025, one of our clients with a pending VAWA petition has
8 been deported. He had also had a Notice of Prima Facie Case. In 2024 and
9 before, none of our clients with pending U, T, or VAWA petitions were
10 deported without any review of their petition, and we could advise our
11 clients that applying for a U or T visa or submitting a VAWA self-petition
12 would protect them. In 2024 and before, we never had a client deported who
13 was in valid deferred action status.

14 10. Since February 2025, we requested a stay of removal for one of our clients
15 with a pending VAWA petition. ICE rejected the request for the VAWA
16 applicant. In 2024 and before, ICE routinely granted U, T, and VAWA
17 petitioners' stays of removal and requested expedited review by USCIS. In
18 2024 and before, we never had a client whose first request for a stay was
19 denied, absent exceptional circumstances.

20 11. Since February 2025, one of our clients with a pending VAWA petition has
21 been required to attend more frequent ICE check ins. In 2024 and before,
22 clients with pending survivor-based petitions attended infrequent, routine
23 ICE check ins without incident; now, we attend ICE check-ins with clients
24 because we believe there is a high risk they will be detained.

25 12. Since February 2025, our clients with pending U and VAWA petitions are
26 more fearful of detention and deportation. Since February 2025, we have
27 seen a drop in the number of people who request our assistance to apply for
28 a survivor-based benefit.

1 **C. Detained VAWA Client: VMA**

2 13. Our office represents a client in their VAWA petition, which was filed on
3 September 18, 2023. The client's name is VMA.

4 14. *Life & basis of visa petition:* VMA's family depended on his income. He
5 worked as a construction worker to support his wife and son. Since 2014, he
6 would regularly attend his ICE appointments. VMA has an old conviction
7 for disorderly conduct.

8 15. In 2023, VMA applied for VAWA based on the abuse he endured from his
9 U.S. citizen son. His son was verbally and physically abusive to him.

10 16. On April 23, 2024, VMA was issued a Notice of Prima Facie Case.

11 17. *Arrested:* On October 28, 2025, VMA was arrested at his ICE check in
12 appointment in Los Angeles, CA.

13
14 16. At his October 28, 2025 ICE check-in, VMA provided proof that he was
15 issued a prima facie notice for his pending VAWA application. That day, I
16 also explained to the ICE officer that my client had a pending VAWA
17 application and had received a prima facie letter. In response, the ICE officer
18 said that the pending VAWA application would not stop the client's arrest
19 and removal.

20 17. *Detained:* VMA was detained from October 28, 2025 until his removal on
21 November 05, 2025. At three (3) different detention centers, he was held in
22 poor conditions with no medical attention. VMA had to endure poor
23 treatment and overcrowding in cells. Despite my delivery of his prescribed
24 medication to the Los Angeles detention center where he was held, detention
25 staff failed to provide VMA with his medication.

26 18. VMA has anxiety from the abuse he experienced at the hands of his son,
27 which he reported to police. The detention center staff's cruel and neglectful
28 treatment of VMA triggered his anxiety and caused him extreme emotional
distress.

1 19. On October 29, 2025, I requested a Stay of Removal with ICE on behalf of
2 VMA in Los Angeles, CA. ICE rejected the stay request.

3 20. On October 30, 2025, I informed the deportation officer in Adelanto, CA,
4 that the client had a pending VAWA application. The officer responded that
5 the application would not prevent his removal.

6 21. On October 31, 2025, the Jessica Dominguez Immigration Law Group filed
7 a Habeas Petition and Temporary Restraining Order (“TRO”) for VMA in
8 the Central District of California. On November 05, 2025, before an order
9 issued on his habeas petition, VMA was deported to his home country.

10 **D. Harm to Other Clients**

11
12 22. Based on my experience representing U visa and VAWA petitioners, under
13 prior policies before 2025, VMA: (1) would have not been arrested; (2)
14 would have been promptly released once I notified ICE of his pending
15 VAWA application; (3) would have been granted a stay of removal; and (4)
16 would have not been deported.

17 23. The new 2025 policy directly aims to detain and deport U/T/VAWA
18 petitioners, including my own clients. Based on my experience, this is a
19 sharp departure from prior DHS policies and practices concerning immigrant
20 survivors. The new policy has irreparably harmed survivors who would have
21 previously had protection and has caused my clients to fear engaging with
22 law enforcement, even if they experience trafficking or abuse.

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

25
26
27 Dated: December 23, 2025

Respectfully submitted,

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/s/ *Jesus E. Saucedo* _

Jesus E. Saucedo

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Case No.: 2:25-cv-09848-AB-AS

**DECLARATION OF SUZETTE COLON
CALES**

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* *Admitted Pro Hac Vice*

DECLARATION OF SUZETTE COLON CALES
MANAGING ATTORNEY FOR ELIZABETH ROSARIO LAW, PLC

I, Suzette Colon-Cales, declare and state as follows:

1. I have personal knowledge of the facts set forth below and if called to testify, I could and would do so competently.
2. My name is Suzette Colon-Cales, and I am the Managing Attorney at Elizabeth Rosario Law, PLC, which main office is located at 545 28th St SW, Wyoming, MI 49509. I have been working at the firm for three years.
3. Elizabeth Rosario Law, PLC is a client-centered immigration law firm dedicated to helping individuals and families achieve safety, stability, and lawful status in the United States. The firm focuses on humanitarian immigration relief—particularly VAWA, U visas, T visas, and family-based petitions—and is known for its trauma-informed, detail-oriented advocacy. With a deep commitment to dignity and access to justice, Elizabeth Rosario Law PLC combines legal excellence with compassionate representation for some of the most vulnerable members of the community.
4. Elizabeth Rosario Law, PLC approximately 600 U visa petitioners, approximately 4800 T visa petitioners, and approximately 1500 VAWA self-petitioners.
5. Our office has represented immigrant survivors seeking survivor-based protections for approximately 13 years.
6. U, T, and VAWA protections are critical to our clients because they provide safety, stability, and lawful immigration options for survivors of crime, trafficking, and abuse—many of whom fear deportation if they seek help. These protections allow clients to report crimes, cooperate with law enforcement, or leave abusive situations without risking immigration consequences. By offering legal protection, work authorization, and a path to lawful status, U, T, and VAWA relief build trust between immigrant survivors and police, increasing the likelihood that clients will report crimes, assist investigations, and engage with the justice system without fear.
7. Prior to 2025, ICE’s victim-centered policies protected our clients who were survivors of abuse, trafficking, and crime. Many of our clients felt secure enough to report the harm they experienced or were able to leave their abuser because of immigrant survivor protections like the U visa, T visa, and VAWA.
8. Since February 2025, 20 of our clients with pending U, T, or VAWA petitions have been detained, including 9 who were in valid deferred action status. In 2024 and before, none of our clients with pending U, T, or VAWA petitions were detained absent exceptional circumstances, and we could advise our clients that applying for a U or T visa or submitting a VAWA self-petition would protect them. In 2024 and before, we had never had a client detained who was in valid deferred action status.
9. Since February 2025, one of our clients with pending U, T, or VAWA petition have been deported while valid deferred action status. In 2024 and before, none of our clients with pending U, T, or VAWA petitions were deported without any review of their petition, and we could advise our clients that applying for a U or T visa or submitting a VAWA self-petition would protect them. In 2024 and before, we had never had a client deported who was in valid deferred action status.

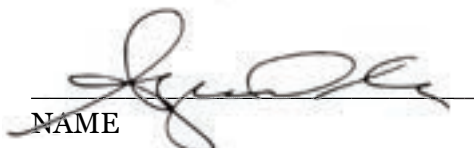
10. Since February 2025, we have requested stays of removal for one of our clients with a qualifying T petition filed days before being detained, and ICE denied that request. In 2024 and before, ICE routinely granted U, T, and VAWA petitioners stays of removal and requested expedited review by USCIS, and we had never had a client whose first request for a stay was denied absent exceptional circumstances.
11. Since February 2025, our clients with pending U, T, or VAWA petitions are more fearful of detention and deportation, and many have changed their lives, such as giving up jobs, or missing school out of fear of being arrested by ICE.
12. Since February 2025, we have seen a drop in the number of people who request our assistance to apply for a survivor-based benefit.
13. Our office represents a client in their VAWA petition, which was filed on December 10, 2021.
14. The client had resided in the United States for many years and established substantial family and community ties, including a long-term relationship and marriage to a U.S. citizen spouse and close parental bonds with the spouse's children, who relied on the client for emotional and practical support. The client maintained steady employment, contributed to the household, and was consistently described by family members, friends, and coworkers as hardworking, dependable, and actively engaged in the community. The client did not pose a danger to the community, as reflected in state criminal clearance records showing no arrest history, and any prior minor traffic-related incidents were resolved without further issue. The client likewise did not pose a flight risk, having complied with court obligations, attended required proceedings, and voluntarily departed the United States when previously ordered. The basis of the visa petition was a VAWA self-petition, founded on a good-faith marriage to a U.S. citizen spouse and the abuse the client suffered during that relationship, as supported by detailed affidavits, corroborating witness statements, and documentary evidence demonstrating both the bona fides of the marriage and the client's good moral character.
15. USCIS issued the client a prima facie determination in connection with the pending VAWA self-petition, which at the time of the client's arrest was in its sixth or seventh issuance and remained valid through March 2026. Based on this prima facie determination, USCIS also issued the client employment authorization. The client never received any notice of revocation or termination of the prima facie determination, and to counsel's knowledge, no facts or circumstances arose after its issuance that would have rendered the client ineligible for such determination during its validity period.
16. The client was arrested on or about October 26, 2025, in Gastonia, North Carolina, following a traffic stop for driving without a license. The arrest occurred on the street and was not the result of an ICE check-in or courthouse enforcement action. The client was initially held in local custody before being transferred to immigration authorities.
17. Following the arrest, the client was detained continuously from late October 2025 through removal in November 2025. The client was held first in local custody and later transferred to detention facilities in Georgia, including Irwin County Detention Center. During detention, the client experienced prolonged uncertainty regarding location and custody status, did not appear on the ICE detainee locator for an extended period, and had severely limited, monitored phone access. The client reported poor detention conditions, including extreme cold, lack of adequate medical attention while ill, and sleep deprivation due to

early-morning transfers. As a survivor of abuse with a pending VAWA petition, the detention caused significant emotional distress, anxiety, and loss of hope, and materially interfered with the client's ability to communicate confidentially with counsel and participate meaningfully in their own case.

18. Throughout the client's detention, our office made repeated efforts to alert ICE to the client's pending VAWA self-petition and valid prima facie determination, including submission of a Form G-28, transmission of prima facie documentation, and direct communications with ICE liaisons and ERO officers. Counsel also sought to coordinate attorney calls and detainee visits and requested consideration of prosecutorial discretion, parole, or release in light of the client's survivor status. ICE did not meaningfully respond to these requests and did not indicate that the pending VAWA petition or prima facie determination would affect the decision to detain or remove the client.
19. On or about November 2025, counsel submitted a request for a stay of removal directly to ICE while the client was detained in Georgia. Despite follow-up calls, emails, and attempts to reach deportation officers, ICE did not issue a written response or grant the stay before executing the client's removal.
20. Before 2025, in my professional experience, cases like this were handled differently. I had not previously had a client detained and removed while holding a valid prima facie determination tied to a pending VAWA petition. Historically, ICE routinely exercised prosecutorial discretion for survivors with pending U, T, or VAWA petitions, frequently agreed to administrative closure or stays of removal, and often coordinated with USCIS to request expedited adjudication when a survivor was detained. ICE typically conducted background checks, deferred to USCIS's determinations, and avoided enforcement actions that would undermine congressionally protected survivor-based relief. The handling of this case represents a significant departure from those prior practices.
21. Based on my experience representing U, T, and VAWA self-petitioners prior to 2025, a client in this posture would not have been arrested or detained by ICE in the first instance, particularly where the client held a valid prima facie determination or other form of survivor-based protection. If an arrest had occurred, ICE would have promptly released the client upon notification of the pending survivor-based petition and submission of proof of eligibility, including prima facie documentation. Under prior practice, ICE routinely granted stays of removal, declined to execute old removal orders, and refrained from reopening or enforcing removal proceedings while a U, T, or VAWA petition was pending. ICE generally deferred to USCIS's determinations regarding eligibility and frequently exercised prosecutorial discretion to avoid enforcement actions that would undermine congressionally protected survivor relief.
22. In my professional judgment, the shift in enforcement practices after 2025 represented a sharp and significant departure from prior policy. This change has had a profound impact on my clients, particularly survivors of abuse, by increasing fear, destabilizing families, and undermining confidence in the protections afforded by survivor-based immigration statutes. It has also materially affected my ability to effectively represent clients, as detention and rapid removal now routinely occur before counsel can meaningfully intervene, communicate with ICE, or seek relief that previously would have been granted as a matter of course.

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

Date 1/3/2026


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12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **WESTERN DIVISION**

15 Immigration Center for Women and
16 Children, et. al.,

17 Plaintiffs,

18 v.

19 Kristi Noem, et. al,
20 Defendants.

Case No.: 2:25-cv-09848-AB-AS

**DECLARATION OF CHRISTINE
MENESES**

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DECLARATION OF CHRISTINE MENESES FOR MENESES LAW, PLLC

I, Christine Meneses, declare and state as follows:

1. I have personal knowledge of the facts set forth below and, if called to testify, I could and would do so competently.
2. My name is Christine Meneses, and I am the Founder and Managing Attorney of Meneses Law, an immigration law firm headquartered at 2900 North Loop West, Suite 300, Houston, Texas 77092. I have practiced immigration law for approximately 8 years, with a primary focus on family-based relief, humanitarian, and survivor-based immigration relief.
3. Meneses Law is a survivor-centered immigration law firm that represents immigrant survivors of domestic violence, sexual assault, human trafficking, and other serious crimes. A substantial portion of our practice is dedicated to U visa, T visa, and Violence Against Women Act (“VAWA”) self-petitions. Our firm regularly collaborates with law enforcement agencies, victim-advocacy organizations, and social-service providers to ensure immigrant survivors can safely access protections established by Congress.
4. Meneses Law currently represents numerous U visa petitioners, T visa petitioners, and VAWA self-petitioners, many of whom have pending petitions before U.S. Citizenship and Immigration Services (“USCIS”).
5. Our office has represented immigrant survivors seeking survivor-based immigration protections for approximately 7 years.
6. Survivor-based immigration protections such as the U visa, T visa, and VAWA self-petition are essential to our clients’ safety and stability. These protections allow

survivors to leave abusive or exploitative situations, reduce vulnerability to retaliation, and meaningfully cooperate with law enforcement without fear that reporting harm will result in detention or deportation.

7. Prior to 2025, ICE enforcement practices were generally consistent with victim-centered policies that protected immigrant survivors with pending U, T, or VAWA petitions. Many of our clients felt safe reporting crimes, seeking restraining orders, or leaving abusive partners because of the protections afforded by these immigration pathways.

Changes Observed Since February 1, 2025

8. Since February 2025, over 50 of our clients with pending U, T, or VAWA petitions have been detained by ICE, including over 20 clients who were in valid deferred action status at the time of detention. Prior to 2025, we had never had a client detained while in valid deferred action status absent extraordinary circumstances.

9. Since February 2025, over 10 of our clients with pending U, T, or VAWA petitions have been removed from the United States, including over 10 who were in valid deferred action status. Prior to 2025, we had never had a client deported without meaningful consideration of their pending survivor-based petition.

10. Since February 2025, our office has requested stays of removal for various clients with pending U, T, or VAWA petitions, and ICE has denied those requests. Before 2025, ICE routinely granted stays of removal for survivor-based petitioners and often sought expedited USCIS review where appropriate.

11. Since February 2025, our clients with pending survivor-based petitions have expressed heightened fear of detention and deportation. Many clients have significantly

altered their daily routines, including avoiding work, medical appointments, school, and essential errands, due to fear of ICE encounters.

12. Since February 2025, Meneses Law has observed a noticeable decline in the number of individuals seeking assistance to apply for survivor-based immigration relief.

13. Since February 2025, our clients have expressed increased fear of engaging with law enforcement. In numerous cases, clients declined to report crimes, seek protective orders, or cooperate with police due to fear of arrest, detention, deportation, or increased vulnerability to retaliation by perpetrators.

Representative Client Experience

16. Our office represents a client with a pending VAWA petition filed on 2023.

17. The client has strong community ties, including family relationships, dependents, employment, and community involvement, has consistently complied with all court and ICE requirements, has no criminal history, and does not pose a flight risk or danger to the community. The petition is based on extreme cruelty and/or battery suffered on the hands of his family member under his I-360 application.

18. On 2023, USCIS issued a bona fide determination and granted deferred action to this client, along with employment authorization. To my knowledge, the client has never received notice of revocation and remains eligible for deferred action.

19. Despite the pending petition and deferred action, ICE detained and held our client in detention while in proceedings in August 2025. He has held without bond even with a bona fide determination.

20. Our office repeatedly notified ICE of the client's pending survivor-based petition and deferred action status and requested prosecutorial discretion, parole, and/or a stay of

removal. ICE indicated that the pending petition or deferred action would not alter its enforcement decision.

21. Prior to 2025, in my professional experience, a client in these circumstances would not have been detained, would have been granted a stay of removal, and would not have had proceedings reopened while their survivor-based petition was pending.

22. Based on my experience representing U, T, and VAWA petitioners, the enforcement practices implemented since February 2025 represent a significant departure from prior policies and have caused substantial harm to immigrant survivors and undermined the effectiveness of survivor-based protections enacted by Congress.

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

Date: 01/03/2026



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13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **WESTERN DIVISION**

15 Immigration Center for Women and
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19 Kristi Noem, et. al,

20 Defendants.

Case No.: 2:25-cv-09848-AB-AS

**DECLARATION OF AUGUY G.
MANGONE**

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* *Admitted Pro Hac Vice*

DECLARATION OF AUGUY G. MANGONE, ESQ.

I, Auguy G. Mangone, declare and state as follows:

1. I have personal knowledge of the facts set forth below and, if called to testify, I could and would do so competently.
2. My name is Auguy G. Mangone, and I am an attorney at Mangone Law Firm, LLC, located at 440 Speedwell Ave., Morris Plains, New Jersey 07950. I have been practicing immigration law for over ten years and have represented immigrant survivors of violence, trafficking, and serious crimes for the majority of my legal career.
3. Mangone Law Firm, LLC is a law firm dedicated primarily to the representation of immigrants in humanitarian and removal defense matters. A substantial portion of our practice focuses on survivor-based immigration protections, including U visas, T visas, and VAWA self-petitions. Our mission is to provide trauma-informed, victim-centered legal representation to noncitizens who have suffered abuse, exploitation, or crime and who seek lawful protection under U.S. immigration law.
4. Our firm currently represents approximately eighty (80) or more U visa petitioners, approximately one thousand (1,000) or more T visa petitioners, and approximately two hundred fifty (250) or more VAWA self-petitioners.
5. Mangone Law Firm, LLC has represented immigrant survivors seeking survivor-based protections for more than ten years.
6. U visa, T visa, and VAWA protections are essential to our clients because they provide a lawful and life-saving pathway for immigrant survivors to escape abuse, exploitation, and criminal victimization. These protections offer stability and safety by reducing the immediate risk of detention and deportation, allowing survivors to separate from their abusers, secure housing, obtain lawful employment, and access medical, psychological, and social services necessary for recovery. Importantly, survivor-based protections foster trust between immigrant communities and law enforcement by assuring victims that cooperation with police, prosecutors, and courts will not result in immigration consequences. In my experience, when survivors are informed that they may qualify for U, T, or VAWA relief, they are significantly more likely to report crimes, comply with investigations, pursue protective orders, and serve as witnesses, thereby advancing public safety and the enforcement of criminal laws.
7. Prior to 2025, ICE's victim-centered policies generally protected our clients who were survivors of abuse, trafficking, and crime. Many of our clients felt sufficiently secure to report the harm they experienced, cooperate with law enforcement, and pursue protective measures, or were able to leave their abuser, specifically because immigrant survivor protections such as the U visa, T visa, and VAWA reduced their fear of detention or

deportation and provided a measure of legal stability during an otherwise dangerous and vulnerable period.

8. Since February 2025, approximately twenty-four (24) of our clients with pending U, T, or VAWA petitions have been detained by ICE, including multiple individuals who were in valid deferred action status at the time of their detention. By contrast, in 2024 and prior years, none of our clients with pending U, T, or VAWA petitions were detained absent truly exceptional circumstances. Prior to 2025, we had never experienced the detention of a client who was in valid deferred action status.
9. Since February 2025, approximately ten (10) of our clients with pending U, T, or VAWA petitions have been deported by ICE, including individuals whose petitions had not been denied and whose eligibility for survivor-based relief had not been revoked. Prior to 2025, we had never had a client deported while in valid deferred action status.
10. Since February 2025, our office has submitted approximately ten (10) requests for stays of removal on behalf of clients with pending U, T, or VAWA petitions. ICE has not granted a single one of these requests and, in many instances, has failed to provide any meaningful or timely response. Prior to 2025, ICE routinely granted stays of removal to survivor-based petitioners and frequently requested expedited USCIS review.
11. Since February 2025, approximately five (5) of our clients with pending U, T, or VAWA petitions have had previously closed or administratively stayed cases reopened by ICE. Prior to 2025, clients with pending survivor-based petitions did not face the risk of having their cases reopened before USCIS adjudicated their petitions. Absent exceptional circumstances, we were not required to represent clients in complex removal proceedings unless and until their petitions were denied.
12. Since February 2025, approximately sixty (60) of our clients with pending U, T, or VAWA petitions have been required to attend additional or more frequent ICE check-ins or have been placed under heightened supervision conditions. Prior to 2025, such check-ins were infrequent and routine.
13. Since February 2025, our clients with pending survivor-based petitions have experienced significantly heightened fear of detention and deportation. Many clients report persistent anxiety that has disrupted employment, education, and family stability.
14. Since February 2025, our clients express increased fear of interacting with law enforcement and are reluctant to report harm or seek protective measures due to fear of arrest, detention, or deportation, undermining the protective purpose of survivor-based immigration relief.
15. Our office represents a client whose VAWA self-petition was filed prior to 2025 and approved by USCIS. Based on that approval, the client was found eligible for adjustment of status under VAWA.

16. The client had resided in the United States for several years, maintained strong community ties, supported dependent family members, had no criminal history, and posed no danger or flight risk. The VAWA petition was based on documented domestic violence recognized under U.S. immigration law.
17. USCIS favorably adjudicated the client's application for adjustment of status and granted lawful permanent resident status. To my knowledge, that grant was never revoked or invalidated.
18. Following the client's detention, our office requested that ICE review the client's case and submitted documentation confirming USCIS's approval of the VAWA petition and the grant of lawful permanent residence. ICE did not provide any response to this request.
19. Removal proceedings were conducted before an Immigration Judge, who issued an order of removal. ICE executed the removal without allowing the client sufficient time to meaningfully pursue available appellate remedies.
20. The client was detained under conditions that caused significant emotional distress and exacerbated trauma associated with prior domestic violence.
21. ICE executed the client's removal from the United States despite the prior grant of lawful permanent resident status.
22. In my professional judgment, the sequence of events in this case reflects a failure to adequately coordinate between ICE enforcement actions and USCIS's prior humanitarian and adjustment determinations.
23. In cases involving detained clients with pending U visa, T visa, or VAWA petitions, our office has routinely submitted requests to ICE seeking a stay of removal. In the majority of these cases, ICE has not granted the requested relief and, to date, has failed to provide any substantive or timely response addressing the pending survivor-based petitions or the humanitarian equities presented.
24. Before 2025, in my experience representing survivors under the VAWA and T visa frameworks, cases like this were handled very differently. Prior to 2025, I had never represented a client with an approved VAWA petition who was arrested, detained, or removed absent extraordinary circumstances. ICE routinely exercised favorable prosecutorial discretion in cases involving approved or pending survivor-based relief, deferred to USCIS's humanitarian determinations, and avoided initiating removal proceedings against survivors whose eligibility for protection had already been established. ICE's prior practice reflected recognition that enforcement action in such cases would undermine the purpose of VAWA and T visa protections.

25. Based on my experience representing U, T, and VAWA petitioners under policies in place before 2025, a client in these circumstances would not have been arrested or detained, would not have been placed into removal proceedings, and would not have been removed from the United States after receiving an approved VAWA petition. Under prior policies, ICE would have deferred enforcement, coordinated with USCIS, and allowed the client to remain in the United States while survivor-based protections governed the case.
26. In my professional judgment, the enforcement actions described above represent a sharp departure from prior ICE practices. This change has had a profound impact on immigrant survivors and has materially altered my ability to advise and represent clients seeking VAWA and T visa protections, as longstanding reliance on victim-centered enforcement practices can no longer be assumed.

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

Date 01/05/2026



Auguy G Mangone, Esq.

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15 Immigration Center for Women and
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Case No.: 2:25-cv-09848-AB-AS

DECLARATION OF GIULIA FANTACCI

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DECLARATION OF GIULIA FANTACCI

I, Giulia Fantacci, declare and state as follows:

1. I have personal knowledge of the facts set forth below and if called to testify, I could and would do so competently.
2. My name is Giulia Fantacci, and I am the Founder and CEO at GF Immigration Law, PA (“GF Immigration Law”) which is located at 420 Lincoln Road, Suite 357, Miami Beach, FL 33139. I have been working at GF Immigration Law for 5 years.
3. At GF Immigration Law we are a movement for justice, walking hand in hand with immigrants to defend their rights with integrity, provide strong legal representation and humanitarian strategies, and empower them to belong and move forward with dignity in the United States. Our clients are primarily victims of human trafficking. They have suffered horrendous abuses in the United States at the hands of their traffickers. Many of them have been victims of labor trafficking, sexual trafficking, and trafficking in all forms. We are proud to stand with them and fight for their rights.
4. GF Immigration Law represents approximately 15,000 T visa petitioners, VAWA self-petitioners and U visa petitioners.
5. Our office has represented immigrant survivors seeking survivor-based protections for over 5 years.
6. It takes a lot for our clients to even share their stories initially with us and then with USCIS. Their trauma is severe and their past experiences often lead them to shut down and not seek the help that they deserve and that they are legally entitled to. Our clients are reporting crimes committed in the United States, and often at the hands of U.S. citizens; they are working with and seeking protections from their local and federal authorities to ensure that what happened to them does not happen to anyone else in the United States.
7. Prior to 2025, ICE’s victim-centered policies protected our clients who were survivors of abuse, trafficking, and crime. Many of our clients felt secure enough to report the harm they experienced or were able to leave their abuser because of immigrant survivor protections like the U visa, T visa, and VAWA.
8. Since February 2025, over 50 of our clients with pending U, T, or VAWA petitions have been detained and deported. In 2024 and before, none of our clients with pending U, T, or VAWA petitions were deported without any review of their petition, and we could advise our clients that applying for a U or T visa or submitting a VAWA self-petition

would protect them. In 2024 and before, we had never had a client deported who was in valid deferred action status.

9. Since February 2025, we have requested stays of removal for 17 of our clients with pending U, T, or VAWA petitions, and ICE has denied 15 of those requests. In 2024 and before, ICE routinely granted U, T, and VAWA petitioners stays of removal and requested expedited review by USCIS, and we had never had a client whose first request for a stay was denied, absent exceptional circumstances. We have additionally had clients with approved T visa cases where ICE ERO has chosen to force them to continue attending check-ins despite evidence of his approved T visa status being submitted to them by the clients and by our office. In 2024 and before, this was not something that any of our clients were forced to do.
10. Since February 2025, our clients with pending U, T, or VAWA petitions are more fearful of detention and deportation, and many have chosen to give up jobs that help provide for their families as a result; many children are afraid of going to school and coming back home to their parents being detained by ICE or being subject to detention themselves; many have chosen to stay home rather than risk being detained at the grocery stores or at a family outing at a park or the mall.
11. Since February 2025, we have seen a significant drop in the number of people who request our assistance to apply for a survivor-based benefit.
12. Since February 2025, our clients have expressed more fear of police and in certain cases, clients have chosen not to report harm or not to pursue a restraining order out of fear of arrest, detention, deportation, or because they are more vulnerable to retaliation by the perpetrator without protection from deportation. This is one of the very things that Congress intended to avoid when it created these protections under law.
13. Our office represents a client in their T visa petition, which was filed on December 19, 2022, and approved by USCIS on February 16, 2024. Our client was the victim of labor trafficking in the United States. Notwithstanding what he suffered, he has been a contributing member of society, helping his siblings and parents in the United States. Nevertheless, ICE has chosen to force him to attend repeated check ins, despite being presented evidence of his approved T visa case. The increased check-ins have caused an increased fear of being detained and deported, despite his approved protections in the United States and are inconsistent with past practices by ICE ERO.
14. Our office represents a client with a pending T visa petition, which was filed on March 31, 2025. He has been attending church every weekend, he is the main financial provider for


his family in the United States and has dreams of continuing to give back to this country. He was detained at an ICE check in on December 18, 2025, and now is at risk of being immediately deported, notwithstanding his pending T visa petition.

15. Our office represents a client with an approved VAWA petition, which was filed on July 29, 2021 and was approved on September 11, 2024. Our client was working and providing for his family in the United States and had been here for over a decade. Our client did not have a deportation order prior to being detained by ICE. ICE not only detained him with an approved I-360 but deported him from the United States within two days.
16. USCIS issued over 30 clients a Bona Fide Determination (“BFD”) and grant of deferred action and then subsequently denied their employment authorization requests claiming that their BFD had been rescinded and that their case would no longer be BFD nor deferred action eligible. Without an ability to obtain work authorization during the pendency of their proceedings with USCIS, clients are more at risk of being detained by ICE for driving without a license and being subjected to mandatory detention under the new jurisdictional argument being advanced by ICE and EOIR.
17. Our office represents a client with a pending T visa petition, which was filed on July 15, 2025. Our client was the primary financial provider for his partner and U.S. citizen children. While the T visa petition was pending with USCIS, ICE detained our client on his way to work and removed him from the United States to El Salvador, notwithstanding his pending T visa petition with USCIS.
18. Our office represents a client with a pending T visa petition, which USCIS erroneously denied in February 2025. Our client was the victim of multiple forms of human trafficking and actively working to overcome her past trauma as a result. She was subsequently issued a Notice to Appear in immigration court. The fear of being detained by ICE and subjected to mandatory detention even though she did not have a criminal record, led her to make the very difficult decision to self-depart the United States.
19. Our office represents a client with a pending T visa petition, which was filed with USCIS on January 16, 2025. Our client was the victim of labor trafficking in the United States. While he was scheduled for his ASC (biometrics) appointment in December 2025, ICE agents surrounded him and detained him. Our client is a father of 2 U.S. citizen children, aged 16 and 8. Our client is ill and takes prescription medications. He is now separated from his family and at risk of being deported by ICE at any moment.

20. Our office represents a client with an approved I-192 waiver and T visa petition, which was approved by USCIS on December 7, 2023. Our client was detained on his way to work on New Years Eve without any criminal issues or any other immediate trigger for removal. Our client was the victim of multiple forms of human trafficking. Our client has been in the U.S. for over 24 years and has U.S. citizen children. He has been an upstanding member of our community. He is now in immigration detention and will spend the holiday away from his family.
21. Before 2025, ICE routinely agreed to administratively close cases for clients with deferred action or pending U visa, T visa, and VAWA petitions and ICE routinely granted stays of removal while clients' U visa, T visa, and VAWA petitions were pending. ICE would also routinely coordinate with counsel on requests for expedited USCIS review when a client was detained.
22. Based on my experience representing U visa, T visa, and VAWA petitioners, under prior policies before 2025, the majority of our clients who have had Stays of Removal denied and who have been arrested and deported by ICE would not have been arrested; would have been promptly released once I notified ICE of their petition or deferred action status; and would have been granted a stay.
23. Since February 2025, we have seen thousands of T visa petitioners be issued Notices to Appear by USCIS, many with pending appeals before USCIS based on erroneous USCIS denials and many with T visa petitions pending. We have seen ICE detain T visa, U visa, and VAWA petitioners while their cases are pending with USCIS. These and many other practices are inconsistent with a victim-centered approach and have had monumental consequences for our clients all over the country. These practices have retraumatized thousands of individuals who suffered heinous crimes in the United States and were brave enough to tell their story, seek help, and seek the protections created for them by law and should be immediately reversed.

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

Date January 5, 2026



Giulia Fantacci

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9 Attorneys for Plaintiffs

10 Additional counsel listed on following page

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12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **WESTERN DIVISION**

15 Immigration Center for Women and
16 Children, et. al.,

17 Plaintiffs,

18 v.

19 Kristi Noem, et. al,

20 Defendants.

Case No.: 2:25-cv-09848-AB-AS

**DECLARATION OF ANGELYNE E.
LISINSKI**

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* *Admitted Pro Hac Vice*

DECLARATION OF ANGELYNE E. LISINSKI, ESQ. FOR LISINSKI LAW FIRM

I, Angelyne Lisinski, declare and state as follows:

1. I have personal knowledge of the facts set forth below, and if called to testify, I could and would do so competently.
2. My name is Angelyne Lisinski. I am an attorney licensed to practice law in Ohio and the CEO of Lisinski Law Firm (“the Firm”) located at 6377 Emerald Parkway, Dublin, OH 43016. The Firm focuses primarily on United States immigration law and related humanitarian forms of relief.
3. Lisinski Law Firm represents noncitizen clients nationwide in a wide variety of immigration matters, including, but not limited to, applications for humanitarian relief such as self-petitions and related benefits under the Violence Against Women Act (VAWA), T nonimmigrant status (T visas) for survivors of severe forms of trafficking, and U nonimmigrant status (U visas) for victims of certain qualifying crimes.
4. Historically, biometric appointments at USCIS Application Support Centers (ASCs) have been treated by practitioners and applicants as routine benefit-processing steps, not as enforcement events, and the risk of on-site detention at such appointments has been understood as extremely low.
5. Since approximately September 2025, Lisinski Law Firm has observed a marked and alarming change affecting our humanitarian clients who appear for biometrics in connection with pending VAWA and T visa matters. Specifically, clients who appeared for what should have been routine ASC biometrics appointments have instead been detained on site and then rapidly removed from the United States. In some cases, the clients are detained before they are permitted to complete the biometric appointment required for their application.
6. From September 2025 to the present, a total of 16 of the Firm’s humanitarian clients have been detained at or in immediate connection with their USCIS biometrics appointments and then removed shortly thereafter. Of these 16 clients, four (4) were applicants in VAWA-based matters, including one with a Bona Fide Determination, and twelve (12) were applicants in T visa matters.
7. In each of the sixteen cases, the client’s appearance at biometrics occurred because USCIS had issued a formal biometrics appointment notice as part of the adjudication process for the pending humanitarian application. The Firm advised each client to attend their biometrics appointment in good faith reliance on the longstanding understanding that such appointments exist to facilitate the adjudication of benefits and are not supposed to function as traps for immediate detention and removal.
8. Over this same time period, national data and reports have reflected an increase in immigration enforcement activity away from the border, including at or in connection with USCIS facilities, as well as a growing pattern of coordinated actions between USCIS and Immigration and Customs Enforcement (ICE).
9. The detention and rapid deportation of these 16 humanitarian applicants at their biometrics appointments have had a severe chilling effect on the Firm’s clients and prospective clients. Many survivors of domestic violence, human trafficking, and other serious crimes now express fear that simply appearing for a USCIS scheduled biometrics appointment could lead to

- immediate detention and removal, even when they are statutorily eligible for relief and have submitted strong, well documented cases with applicable waivers under the INA.
10. In the Firm's professional experience, this pattern undermines the humanitarian purposes of VAWA, T, and related protections, which Congress enacted to encourage survivors to come forward, seek protection, and cooperate with law enforcement without fear that doing so will expose them to heightened enforcement risk at routine benefit processing steps such as biometrics.
 11. The facts stated in this declaration are based on my personal knowledge, my review of Firm records, and my experience as an immigration attorney and CEO of Lisinski Law Firm. If called as a witness, I would testify competently to these facts.
 12. Our office represents a client in her VAWA petition, which was filed on April 1, 2025. On November 12, 2025, USCIS issued a prima facie determination recognizing the merits of her claim.
 13. The client is a non-citizen mother residing in the United States. She has strong community ties, including active participation in her local church, donating clothing, and volunteering at her children's school. She works as a house cleaner and supports her family, with aspirations to open a beauty salon once granted legal status. She has no criminal record and appeared in good faith for her USCIS biometrics appointment, indicating she is neither a flight risk nor a danger to the community. Her VAWA petition is based on a long history of psychological, emotional, financial, and verbal abuse by her son, including explosive anger, property destruction, intimidation, derogatory name-calling, coercive control, and financial exploitation. These patterns of abuse created constant tension and emotional distress, aligning with protections under VAWA for survivors of qualifying family-member abuse.
 14. On September 15, 2025, the client was arrested at her scheduled USCIS biometrics appointment despite appearing in good faith and having a prima facie determination. The arrest was based on a prior removal order.
 15. The client was detained following the arrest, which compounded her trauma as a survivor seeking humanitarian protection.
 16. Before 2025, clients with pending survivor-based petitions and prima facie determinations were rarely arrested at USCIS appointments, and ICE often granted stays or administrative closure.
 17. Based on prior policies and experience representing VAWA petitioners before 2025, our client would not have been arrested, would have been promptly released once ICE was notified of her petition, and would likely have been granted a stay.
 18. In our experience, the current approach represents a sharp departure from prior practice, with increased enforcement against survivors actively seeking humanitarian relief, including arrests at USCIS appointments and detention despite pending petitions. These changes have negatively impacted our clients and complicated representation.

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

Executed on _____ 1/5 _____, 2026, in _____ Tampa, FL _____.

Respectfully,

Angelyne E. Lisinski, Esq.

A handwritten signature in black ink, appearing to read "Angelyne E. Lisinski". The signature is fluid and cursive, with a large initial "A" and "L".

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13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **WESTERN DIVISION**

15 Immigration Center for Women and
16 Children, et. al.,

17 Plaintiffs,

18 v.

19 Kristi Noem, et. al,
20 Defendants.

Case No.: 2:25-cv-09848-AB-AS

DECLARATION OF DENISSE V. MILLER

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* *Admitted Pro Hac Vice*

DECLARATION OF DENISSE V. MILLER, ESQ.

I, Denisse V. Miller, declare and state as follows:

1. I have personal knowledge of the facts set forth below and if called to testify, I could and would do so competently.
2. My name is Denisse V. Miller, and I am the founding attorney at Vergara Miller Law Firm PLLC, which is located at 7070 Knights Ct., Unit 904, Missouri City, TX 77459. I have been working at Vergara Miller Law Firm PLLC for 6 years.
3. At Vergara Miller Law, our mission is to help our clients achieve the stability and security that they deserve. Every case we take represents an opportunity to change lives and build a future full of possibilities.
4. Vergara Miller Law Firm PLLC represents approximately 39 U visa petitioners, approximately 436 T visa petitioners, and approximately 2,498 VAWA self-petitioners.
5. Our office has represented immigrant survivors seeking survivor-based protections for approximately 6 years.
6. VAWA, U visas, and T visas are essential protections that seek to provide safety and justice to noncitizen victims of crimes and violence.
7. Prior to 2025, ICE's victim-centered policies protected our clients who were survivors of abuse, trafficking, and crime. Many of our clients felt secure enough to report the harm they experienced because of immigrant survivor protections like the U visa, T visa, and VAWA.
8. Since February 2025, 11 of our clients with pending U, T, or VAWA petitions have been detained, including 1 who was in valid deferred action status.
9. Since February 2025, at least three of our clients with pending U, T, or VAWA petitions have been deported, including one who was in valid deferred action status.
10. Since February 2025, we have requested stays of removal for one of our clients and he was removed before any decision was made on the pending stay of removal.
11. Since February 2025, we've also had clients with pending U, T, or VAWA petitions who have had closed cases reopened. In 2024 and before, our clients with pending U, T, or VAWA petitions who were not in proceedings and applied for U, T, or VAWA relief, or who had their proceedings administratively closed or stayed based on their U, T, or VAWA petitions pending adjudication, did not have to be concerned about having their case reopened before their petition could be reviewed by USCIS. Absent exceptional circumstances, we were not forced to represent our clients in complex removal proceedings unless and until their petition had been denied.
12. Since February 2025, our clients with pending U, T, or VAWA petitions are more fearful of detention and deportation, and they fear attending their scheduled biometrics appointments.
13. Since February 2025, we have seen a drop in the number of people who request assistance to apply for a survivor-based benefit.
14. Since February 2025, our clients express more fear of police and we have had a client decline to make a police report, even though they were in a physical altercation with their abuser, for fear of being arrested by ICE. This is a clear case of a client choosing not to report harm or not to pursue a restraining order out of fear of arrest, detention, deportation.
15. Our office represents a client in their VAWA petition, which was filed on July 14, 2025.

16. This client has had a challenging life, as she suffered psychological and sexual abuse at the hands of her U.S. citizen husband. She is now divorced from her husband and remains a single parent to two sons, one of which is a U.S. citizen and one of which is included as a derivative in her VAWA filing. Unfortunately, the son included as a derivative was taken into ICE custody. This client poses no flight risk; she has no criminal record and is now facing the prospect of losing one son to deportation while their VAWA case is pending.
17. In August of 2025, USCIS issued a prima facie determination in her case and even though her case remains pending and her son is included as a derivative, he was taken into custody. He is now in removal proceedings before the Immigration Court.
18. Before 2025, it's unlikely that this client's son would have been arrested, in light of his inclusion in his mother's pending VAWA petition.
19. The general changes in policy that were implemented in 2025, with their emphasis on detention and expedited removal, have impacted my clients, their families and their opportunities to seek valid and deserved relief in the U.S.

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

Date: January 5th, 2026



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14 **WESTERN DIVISION**

15 Immigration Center for Women and
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20 Defendants.

Case No.: 2:25-cv-09848-AB-AS

DECLARATION OF JOSEPH DORSEY

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* *Admitted Pro Hac Vice*

DECLARATION OF JOSEPH DORSEY FOR LISINSKI LAW FIRM

I, Joseph Dorsey, declare and state as follows:

1. I have personal knowledge of the facts set forth below and if called to testify, I could and would do so competently.
2. My name is Joseph Dorsey, and I am a Staff Attorney at Lisinski Law Firm, which is located at 6377 Emerald Pkwy, Dublin OH 43016. I have been working at Lisinski Law Firm for nine months.
3. Lisinski Law Firm was founded with a clear purpose: to change as many lives as possible. As a leader in immigration legal services, we are dedicated to humanitarian cases and recognize that everyone deserves an opportunity to build a safe future in the United States.
4. Our office has represented immigrant survivors seeking survivor-based protections for approximately five years.
5. Prior to 2025, ICE's victim-centered policies protected our clients who were survivors of abuse, trafficking, and crime. Many of our clients felt secure enough to report the harm they experienced or were able to leave their abuser because of immigrant survivor protections like the U visa, T visa, and VAWA.
6. Since February 2025, our clients with pending U, T, or VAWA petitions are more fearful of detention and deportation. Many have missed work, stayed indoors, and even withdrawn cases with USCIS out of fear of being arrested by ICE.
7. Our office represents a client in their VAWA petition and Adjustment of Status application, which was filed on 4/25/2024.
8. My client was a staple in her family and community. At home she acted as a caretaker for her husband's medical conditions and support system for her children and grandchildren. She and her husband own their house jointly, and she was working as a factory packer to support her household and family. She was an active church member and volunteered to teach bible classes. She is proud of her and her husband's efforts to lend a helping hand to those around her. This VAWA petition was based on abuse from her son while he was growing up.
9. On 11/19/2025, my client attended her USCIS interview for her VAWA petition and Adjustment of Status. The USCIS officer conducting the meeting noted that she was not trauma informed and did not have the appropriate training to conduct a VAWA interview. Instead, we continued only with the I-485 Adjustment of Status interview. At the end of the meeting, the USCIS Louisville Field Office Director entered and informed us that ICE was in the facility and would be taking my client. I asked, "Based on what?" The director said that my client was removed from and then returned to the United States without inspection. I argued that she entered with a waive-through and was therefore inspected. He replied, "That's not credible." My client calmly stood up and we exited the office to ICE agents in the hallway. They put her in handcuffs and walked her out a back door.
10. My client was detained for over a month before being deported. She was held in the Clark County, IN prison. The Louisville ICE agents indicated that all women are sent there, rather than a detention facility. When I spoke with her, my client was immediately


concerned about getting access to her medications in the prison. She had spoken to others being detained and heard that some had been there for up to six months. She was scared, but hopeful.

11. The stay of removal I filed on 11/20/2025 indicated that my client had an active VAWA application. On 12/2/2025, our firm submitted an expedited review request to USCIS based on Severe Financial Loss and Emergency. Later, we received denials for my client's I-485, I-601, and I-212. On 12/16/2025, we resubmitted an expedited review request only for the I-360. On 12/29/2025 the expedite request was denied.
12. After my client was arrested at her interview in Louisville, I attempted to file a stay of removal at the Louisville ICE facility. They claimed that I would have to submit it at the main office in Chicago. The next day, I successfully filed a stay of removal in Chicago.

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

Date 1/5/2026

Name Joseph Dorsey

Signature 

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Case No.: 2:25-cv-09848-AB-AS

DECLARATION OF RACHEL PARRIS

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* *Admitted Pro Hac Vice*

DECLARATION OF RACHEL PARRIS OF LISINSKI LAW FIRM

I, Rachel Parris, declare and state as follows:

1. I have personal knowledge of the facts set forth below and if called to testify, I could and would do so competently.
2. My name is Rachel Parris, and I am a Staff Attorney at Lisinski Law Firm, which is located at 6377 Emerald Pkwy, Dublin, OH 43016. I have been working at Lisinski Law Firm for 4 months.
3. Our mission is to bring compassion back to law by protecting client rights, representing and fighting for what our clients deserve. Our purpose is to change as many lives as possible. That means giving immigrant families the resources they need to build a safe future and stay together in the United States. Lisinski Law Firm stands out as a leader in immigration legal services because we are dedicated to humanitarian cases and recognize that everyone deserves an opportunity to obtain documents.
4. Immigrants often face dangerous situations, endure harsh living conditions, and have limited access to social and financial resources. Our legal practice is designed to provide protection, long-lasting safety, and immigration relief. While many believe that they must leave the United States to reach legal status, we look exclusively for ways to do so within the country, because families deserve to stay together.
5. The foundation of our legal immigration services is to provide humanitarian relief. We take on cases that focus on vulnerable communities because everyone deserves an opportunity to live with dignity and documents. Our trusted immigration lawyers work tirelessly to identify ways to provide legal protection in the U.S., so that no more families get separated.
6. Our firm has represented immigrant survivors seeking survivor-based protections for approximately 5 years.
7. Prior to 2025, ICE's victim-centered policies protected our clients who were survivors of abuse, trafficking, and crime.
8. Our office represents a client in their VAWA self-petition and Adjustment of Status application, which were both filed on 9/17/2021.
9. Our client came to the U.S. in the 1990s to escape the cartel problems facing his community, and to be able to economically help his family back home. Our client married his citizen spouse, and the problems and abuse in that marriage led him to qualify for a VAWA petition.
10. Our client's entire life is in the U.S. He has lived in the U.S. longer than he has ever lived in his home country. Additionally, our client has no strong family ties in his home country.
11. Coming to the U.S. completely changed our client's life. He owns his own business in the U.S. He has a strong relationship with God and he does charity work to support his community, family and friends. Our client would offer food, shelter, and money to people in need. Although our client has a criminal record, he has not had any serious criminal involvement in the last 20 years.
12. On 5/2/2025, USCIS issued a grant of deferred action to our client. USCIS also issued our client employment authorization pursuant to their deferred action. Our client has never received any notice of revocation of deferred action and to our knowledge; nothing has caused them to no longer be eligible for deferred action since it was granted. On 10/30/2025, our client was detained by ICE in the middle of his adjustment of status interview. The interview was never completed.
13. On 10/30/2025 when ICE entered the adjustment interview, they stated they were reinstating our client's prior removal order. No documentation was given. The ICE

- officers provided me with the address our client would be taken to. Our client had valid deferred action at that point. We then prepared a stay of removal that stated our client had deferred action, employment authorization, and a pending adjustment application.
14. On 10/30/2025 and 10/31/2025, our office requested a stay of removal for our client based on his pending adjustment application and based on his deferred action and employment authorization. On 10/30/2025, when I went to the ICE processing office our client was sent to, I attempted to file the stay of removal and speak with our client. The officer at that processing office stated I had to file the stay at a different office and that I would not be allowed to speak with our client at that office. I was able to get a G-28 signed at the processing office.
 15. On 10/31/2025 I went to file the stay at the other office. They took the stay and then returned it to me because they were unable to locate our client in the system. I told them I knew he was in ICE custody because I was there when he was taken. They informed me I had to come back to file it when he popped up in the system. Our client never showed up in the system.
 16. We continued to check the ICE Detainee Locator multiple times a day. We emailed and called the field office on multiple occasions, and no answer was ever received. The only "official" updates we were ever able to receive about our client came through the detention facilities, and they would solely tell us our client was still detained there, and they would tell us nothing specifically about his case.
 17. In 2012, our client was issued a removal order, and he was removed in connection with that order that same year. Our client returned to the country and was removed again in 2017, 2020, and now 2025. All our client's entries after being removed were in connection with the pressure from his wife to return to the country.
 18. Our client was held in multiple ICE Detention Facilities for a little over two weeks before being removed from the United States. I was able to set up a meeting to speak with our client at one of the facilities. However, on the day of the meeting, our client was transferred to another facility, and I was unable to speak with him. When I contacted the new facility, they informed me he was transferred again, and they did not know where. I was later informed that he was deported.
 19. We were never able to file a stay of removal as our client never showed in the system, and our client never saw a judge prior to being removed.

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

Date 1/5/2026

Signature *Rachel Paris*