

**18-15068, 18-15069, 18-15070, 18-15071, 18-15072, 18-15128, 18-15133, 18-15134**

---

IN THE  
**United States Court of Appeals**  
 FOR THE NINTH CIRCUIT

---

REGENTS OF THE UNIVERSITY OF CALIFORNIA; JANET NAPOLITANO, In her official capacity as President of the University of California; STATE OF CALIFORNIA; STATE OF MAINE; STATE OF MINNESOTA; STATE OF MARYLAND; CITY OF SAN JOSE; DULCE GARCIA; MIRIAM GONZALEZ AVILA; SAUL JIMENEZ SUAREZ; VIRIDIANA CHABOLLA MENDOZA; JIRAYUT LATTHIVONGSKORN; NORMA RAMIREZ; COUNTY OF SANTA CLARA; SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 521,

*Plaintiffs-Appellees,*

—v.—

UNITED STATES OF AMERICA; DONALD J. TRUMP, in his official capacity as President of the United States; U.S. DEPARTMENT OF HOMELAND SECURITY; KIRSTJEN NIELSEN, In her official capacity as Acting Secretary of the Department of Homeland Security,

*Defendants-Appellants.*

---

ON APPEAL FROM THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 HON. WILLIAM ALSUP, CASE NO. 3:17-CV-05211-WHA

---

**BRIEF OF *AMICI CURIAE* 119 RELIGIOUS ORGANIZATIONS  
 IN SUPPORT OF PLAINTIFFS-APPELLEES FOR  
 AFFIRMANCE OF PRELIMINARY INJUNCTION**

---

STEVEN A. ZALESIN  
 ADEEL A. MANGI  
 MICHAEL N. FRESCO  
 ZACHARY KOLODIN  
 PATTERSON BELKNAP WEBB  
 & TYLER LLP  
 1133 Avenue of the Americas  
 New York, New York 10036  
 (212) 336-2000

JOHNATHAN SMITH  
 SIRINE SHEBAYA  
 JUVARIA KHAN  
 MUSLIM ADVOCATES  
 P.O. Box 66408  
 Washington, DC 20035  
 (202) 897-2622

*Attorneys for Amici Curiae 119 Religious Organizations*

---

**RULE 26.1 CORPORATE DISCLOSURE STATEMENT**

Pursuant to Federal Rule of Appellate Procedure 26.1, *amici curiae* hereby certify that they have no parent corporations and that no publicly held company owns 10% or more of their stock.

**TABLE OF CONTENTS**

	<b>Page</b>
RULE 26.1 CORPORATE DISCLOSURE STATEMENT.....	ii
TABLE OF AUTHORITIES .....	iv
INTEREST OF <i>AMICI CURIAE</i> .....	1
SUMMARY OF ARGUMENT .....	5
ARGUMENT .....	7
I. RELIGIOUS ORGANIZATIONS SUPPORT DACA AS A JUST RESPONSE TO A HUMANITARIAN CRISIS.....	8
II. TERMINATION OF DACA WILL CAUSE <i>AMICI</i> , THEIR CONGREGATIONS, AND THEIR COMMUNITIES IRREPARABLE HARM AND POSES A GRAVE THREAT TO PUBLIC WELFARE .....	12
A. Direct Harm to <i>Amici</i> and Their Congregants .....	14
B. Impairment of <i>Amici</i> 's Ability To Carry Out Their Missions .....	19
C. As Sensitive Locations for Immigration Enforcement Purposes, Some <i>Amici</i> Will be Called Upon to Provide Sanctuary While at the Same Time Risking Being Targeted for Immigration Raids .....	20
III. THIS COURT SHOULD AFFIRM THE NATIONWIDE INJUNCTION UNDER THE ADMINISTRATIVE PROCEDURE ACT .....	26
CONCLUSION .....	28

**TABLE OF AUTHORITIES**

	<b>Page(s)</b>
<b>Cases</b>	
<i>Georgia v. Penn. R.R. Co.</i> , 324 U.S. 439 (1945).....	13
<i>Harmon v. Thornburgh</i> , 878 F.2d 484 (D.C. Cir. 1989).....	27
<i>Hawaii v. Trump</i> , 859 F.3d 741 (9th Cir. 2017) .....	20
<i>Kalaw v. Ferro</i> , 651 F. Supp. 1163 (W.D.N.Y. 1987).....	18
<i>Lewis v. Casey</i> , 518 U.S. 343 (1996).....	26
<i>Cal. ex rel. Lockyer v. Safeway, Inc.</i> , 355 F. Supp. 2d 1111 (C.D. Cal. 2005) .....	13
<i>Lujan v. Nat’l Wildlife Fed’n.</i> , 497 U.S. 871 (1990).....	27
<i>Nat’l Mining Ass’n v. U.S. Army Corps of Eng’rs</i> , 145 F.3d 1399 (D.C. Cir. 1998).....	26, 27
<i>Nunez v. Boldin</i> , 537 F. Supp. 578 (S.D. Tex. 1982).....	17
<i>Valle Del Sol Inc. v. Whiting</i> , 732 F.3d 1006 (9th Cir. 2013) .....	20
<i>Winter v. NRDC, Inc.</i> , 555 U.S. 7 (2008).....	13

**Other Authorities**

ABC-7 KVIA, *Which places are considered ‘sensitive locations’?*,  
<http://www.kvia.com/crime/which-places-are-considered-sensitive-locations/338319025> (Feb. 16, 2017) .....25

Alex Emmons, *The Intercept*, *Targeting a Sanctuary: After ICE Stakes Out a Church Homeless Shelter, Charities Worry Immigrants Will Fear Getting Help*,  
<https://theintercept.com/2017/02/27/after-ice-stakes-out-a-church-homeless-shelter-charities-worry-immigrants-will-fear-getting-help/> (Feb. 27, 2017).....24

CBS News, *Undocumented immigrant, father of leukemia patient, takes refuge in Phoenix church*,  
<https://www.cbsnews.com/news/undocumented-immigrant-father-of-leukemia-patient-takes-refuge-in-phoenix-church/> (Feb. 12, 2018, 7:20 AM).....23

Council on American-Islamic Relations, *CAIR Condemns Trump’s Termination of DACA Program as ‘Pandering to Anti-Immigrant Extremists’*, <https://www.cair.com/press-center/press-releases/14582-cair-condemns-trump-s-termination-of-daca-program-as-pandering-to-anti-immigrant-extremists.html> (Sept. 5, 2017) .....10

Julie Carey, *NBC Washington*, *ICE Agents Arrest Men Leaving Fairfax County Church Shelter*,  
<https://www.nbcwashington.com/news/local/ICE-Agents-Arrest-Men-Leaving-Alexandria-Church-Shelter-413889013.html> (Feb. 15, 2017) .....23

Memorandum from John Morton, Director, U.S. Immigration and Customs Enforcement to Field Office Directors, Special Agents in Charge, and Chief Counsel (Oct. 24, 2011),  
<https://www.ice.gov/doclib/ero-outreach/pdf/10029.2-policy.pdf> .....21

Odette Yousef, *WBEZ 95.1 Chicago*, *Amid Deportation Push, Suburban Church Grapples with Loss*,  
<https://www.wbez.org/shows/wbez-news/amid-deportation-push-suburban-church-grapples-with-loss/3d269fc3-04e7-4604-bae4-a376a37410c9> (Feb. 15, 2016) .....24

Qué Pasa Mi Gente, *Arrestos de ICE cerca de escuela elemental de mayoría hispana*,  
<https://charlotte.quepasanoticias.com/noticias/ciudad/local/arrestos-de-ice-cerca-de-escuela-elemental-de-mayoria-hispana> (Feb. 9, 2017) .....24

Religious Action Center of Reform Judaism, *Reform Jewish Movement Assails White House Targeting of Immigrant Youth*,  
<https://rac.org/reform-jewish-movement-assails-white-house-targeting-immigrant-youth> (Sept. 5, 2017).....11

Sanctuary Movement, <http://www.sanctuarynotdeportation.org/>.....11

Tina Vasquez, Rewire, *Have Trump’s Mass Deportations Begun? Immigration Arrests Reported Around the Country*,  
<https://rewire.news/article/2017/02/10/trumps-mass-deportations-begin-immigration-arrests-reported-around-country/> (Feb. 10, 2017) .....24

U.S. Dep’t of Homeland Security, Statement by Secretary Jeh C. Johnson on Southwest Border Security,  
<https://www.dhs.gov/news/2016/02/02/statement-secretary-jeh-c-johnson-southwest-border-security> (Feb. 2, 2016).....21

U.S. Immigration and Customs Enforcement, FAQ on Sensitive Locations and Courthouse Arrests: Does ICE’s policy sensitive locations policy remain in effect?,  
<https://www.ice.gov/ero/enforcement/sensitive-loc> .....21

United States Conference of Catholic Bishops, *USCCB President, Vice President and Committee Chairmen Denounce Administration’s Decision to End DACA and Strongly Urge Congress to Find Legislative Solution*,  
<http://www.usccb.org/news/2017/17-157.cfm> (Sept. 5, 2017).....10

## INTEREST OF *AMICI CURIAE*<sup>1</sup>

Led by the Muslim Bar Association of New York, *amici* are American religious or religiously-affiliated organizations who represent a wide array of faiths and denominations. *Amici* include congregations and houses of worship as well as professional, civil liberties, and immigrant rights groups who work with or represent faith communities (“Religious Organizations”). *Amici* have long supported Deferred Action for Childhood Arrivals (“DACA”) as a compassionate and appropriate response to the humanitarian crisis posed by the hundreds of thousands of undocumented people brought to this country as children, before they could make choices of their own. *Amici* believe that the arbitrary rescission of DACA will indelibly harm the vitality of their spiritual communities, including by forcing committed members of their congregations and organizations to leave the country or return to the shadows. Indeed, certain *amici* have committed to providing sanctuary to those targeted for deportation. *Amici* are identified here by name, with a fuller description of their identities and interests attached to this memorandum at Appendix A.

---

<sup>1</sup> Pursuant to Federal Rule of Appellate Procedure 29(a)(4)(e), *amici* certify that this brief was not written in whole or in part by counsel for any party, and no person or entity other than *amici* and their counsel has made a monetary contribution to the preparation and submission of this brief. All parties have consented to the filing of this *amicus* brief. See Fed. R. App. 29(a)(2).

*Amici* are: Albuquerque Insight Meditation Center; Albuquerque Mennonite Church; Albuquerque Monthly Meeting of the Religious Society of Friends (Quakers); The American Association of Jewish Lawyers and Jurists; American Baptist Churches of Metropolitan New York; American Friends Service Committee; Anshe Chesed, New York City; Arch Street United Methodist Church; Association of Muslim American Lawyers; Cabrini Immigrant Services of NYC; Campus Ministry of Roman Catholic Archdiocese of New York at Hostos and Bronx Community College of City University of New York; Capital Area Muslim Bar Association; Catholic Charities of the Diocese of Stockton; Catholic Charities Community Services of the Archdiocese of New York; Catholic Legal Immigrant Network, Inc.; Catholic Legal Services, Archdiocese of Miami, Inc.; Central Conference of American Rabbis; Central Pacific Conference of the United Church of Christ; Church Council of Greater Seattle; Church of Our Redeemer in Lexington, Massachusetts; Church of Our Saviour/La Iglesia de Nuestro Salvador (Cincinnati, Ohio); Congregation B'nai Israel of Sacramento; Congregation B'nai Jeshurun (New York City); Congregation Beit Simchat Torah; Congregation Beth Elohim (Brooklyn, NY); Congregation Shaarei Shamayim (Madison, Wisconsin); Council of Churches of the City of New York; Council on American-Islamic Relations – California Chapter; Council on American-Islamic Relations – Michigan Chapter; Council of American-Islamic Relations – New Jersey Chapter;



Council of American-Islamic Relations – New York Chapter; Council on American-Islamic Relations – Oklahoma Chapter; Cuba Presbyterian Church (Presbyterian Church, USA), Cuba, New Mexico; Daughters of Charity of St. Vincent de Paul; Degrees of Change; DMV Sanctuary Congregation Network; Dominican Development Center; East End Temple (New York City); El Paso Monthly Meeting of the Religious Society of Friends; Emgage; Episcopal City Mission; Episcopal Dioceses of Massachusetts; Episcopal Diocese of New York; Episcopal Dioceses of Western Massachusetts; Episcopal Society of Christ Church/The Christ Church Cathedral, Cincinnati, Ohio; Faith Action Network; First Congregational United Church of Christ (Albuquerque, New Mexico); First Presbyterian Church of Taos, New Mexico; First Unitarian Congregational Society in Brooklyn; First United Presbyterian Church of Las Vegas, New Mexico; Franciscan Friars of the Province of St. Barbara; Global Justice Institute; Hawaii Conference of the United Church of Christ; Hispanic Apostolate of the Catholic Diocese of Baton Rouge; Hispanic Connection of Southern Indiana; Hyattsville Mennonite Church; ICNA Council for Social Justice; Interfaith Alliance of Iowa; Iowa Conference of the United Church of Christ; Islamic Circle of North America; Islamic Society of Basking Ridge; Islamic Society of Central Jersey; Lab/Shul; Leadership Conference of Women Religious; Legal Advocacy Project of Unitarian Universalist FaithAction of New Jersey; Living Interfaith Church of Lynnwood,

WA; Lutheran Social Services of New York (LSSNY); Maryknoll Office for Global Concerns; Metropolitan New York Synod of the Evangelical Lutheran Church in America; Muslim Advocates; Muslim Bar Association of New York; Muslim Public Affairs Council; Muslim Urban Professionals (Muppies); Muslims for Peace, Inc.; Muslims for Progressive Values; National Council of Jewish Women; NETWORK Lobby for Catholic Social Justice; New Jersey Interfaith Coalition; New Mexico Conference of Churches; New Mexico Faith Coalition for Immigrant Justice; New Sanctuary Coalition; New Sanctuary CT; New York Board of Rabbis; New York Conference United Church of Christ; Northern California Nevada Conference of the United Church of Christ; Oregon Interfaith Movement for Immigrant Justice; Pacific Northwest Conference of the United Church of Christ; Presbyterian Church (U.S.A.); Presbytery of the Pacific; Presentation Sisters at Caminando Juntos; Province of St. Mary of the Capuchin Order; Queens Federation of Churches; Religious Institute; Romemu; Santa Fe Monthly Meeting of the Religious Society of Friends (Quakers); Sikh Coalition; Society for the Advancement of Judaism; Southern California Nevada Conference of the United Church of Christ; Southwest Conference of the United Church of Christ; St. Andrew Presbyterian Church in Albuquerque, New Mexico; St. Francis Community Services / Catholic Legal Assistance Ministry; St. Luke's Episcopal Church in Long Beach; St. Stephen's Episcopal Church in Boston; St. Thomas of

Canterbury Episcopal Church (Albuquerque, NM); Stephen Wise Free Synagogue; T'ruah: The Rabbinic Call for Human Rights; Temple Israel of Hollywood (CA); Temple Israel of the City of New York; Temple Sinai (Washington, DC); Town and Village Synagogue, New York, New York; Trinity Church Wall Street; Union for Reform Judaism, including Reform Jewish Voice of New York State; Unitarian Universalist Mass Action Network; United Methodist Women; University Christian Ministry at Northwestern University; Visitation BVM Church in Philadelphia, Pennsylvania; West End Synagogue (New York City); Westminster Presbyterian Church of Santa Fe; and Women of Reform Judaism.

### **SUMMARY OF ARGUMENT**

Since DACA's inception in 2012, American religious communities of many faiths have supported the program as a just and compassionate response to a moral and humanitarian crisis. The children and young adults eligible for and currently receiving the benefits of DACA status (often referred to as "Dreamers") were, in most cases, brought to this country as children by their parents. They have lived most of their lives in the United States, typically with no memory of any other home. Only young people who have pursued education or served in our military, and have no significant criminal record, are eligible for DACA status. Yet they now face deportation to often dangerous and unfamiliar places, or a life in the undocumented shadows.

*Amici* believe, on the basis of faith and morality, that these children and young adults must be protected. *Amici* therefore offer this brief in support of Plaintiffs-Appellees in order to address how, in their view, the Government's proposed termination of DACA (the "Termination Memo") would cause irreparable harm and constitute a severe detriment to the public. *Amici* have firsthand knowledge of the valuable contributions to faith and community made by DACA recipients and understand all too well the harm that the termination of DACA would cause. For example, ending DACA would put Nancy, an Associate Rector at *amicus* St. Luke's Episcopal Church in Long Beach, California, who came to the United States from Mexico at age seven, at risk of deportation. *Amici* detail the stories of Nancy and others like her in Section II(A) below to provide the Court with a sample of the lives that are at risk of being upended. *Amici* also know, because of their religious and charitable work in Latin America and other regions, the challenges and dangers these young people face if they are deported.

*Amici* also have a direct stake in these issues beyond their religious concerns and the protection of their congregants. *First, amici* stand to lose the substantial benefits they currently enjoy as a result of the varied contributions that DACA recipients make to their congregations and institutions.

*Second*, if the Termination Memo is carried out and DACA recipients and DACA-eligible individuals are forced into hiding, *amici* will suffer an impairment

of their ability to carry out their core mission to provide spiritual guidance and general assistance to people of all backgrounds and faiths.

*Third*, many *amici* have and will continue to offer sanctuary to those facing deportation. *Amici*'s churches, mosques, and synagogues are ostensibly designated by U.S. Immigration and Customs Enforcement ("ICE") as sensitive locations to be avoided by enforcement officials, but ICE has shown a growing willingness to target and exploit, rather than avoid, sensitive locations. *Amici* will be on the front line of this conflict if DACA is rescinded: honoring their convictions to protect DACA recipients will risk ICE raids on or around their houses of worship.

For the reasons set forth herein and in Plaintiffs-Appellees' and other *amici*'s briefs, *amici* urge the Court to affirm the district court's grant of provisional relief enjoining the Termination Memo in its entirety. This is the appropriate remedy pursuant to the Administrative Procedure Act, as described in Section III below, and is necessary to prevent irreparable harm.

### **ARGUMENT**

The district court enjoined the Government from proceeding with its planned termination of DACA, finding that plaintiffs demonstrated (1) a likelihood of success on the merits of their claims under the Administrative Procedure Act, (2) irreparable harm, and (3) that the balance of equities and the public interest favored injunctive relief. (*See* Dkt. 48 in Case No. 3:17-cv-05813-WHA). *Amici* endorse

the district court's holding and the arguments set forth by Plaintiffs-Appellees, and submit this brief to further illustrate the irreparable harm that implementation of the Termination Memo would cause. *Amici* also endorse the parameters of the relief ordered by the district court, and urge this court to affirm the nation-wide injunction.

## **I. RELIGIOUS ORGANIZATIONS SUPPORT DACA AS A JUST RESPONSE TO A HUMANITARIAN CRISIS**

*Amici* object to the Government's arbitrary and ill-reasoned decision to rescind DACA on moral, spiritual, and religious grounds. Although they represent different faiths and denominations, *amici* are in unequivocal agreement that DACA is a force for good in our society that should be protected. As *amicus* Catholic Charities Community Services of the Archdiocese of New York explains, "DACA is an important first step to acknowledging and growing the human and social contributions and needs of young immigrants and of our own communities."<sup>2</sup> Those who are eligible for DACA or who already benefit from it "were brought to the United States" by their parents, "now have established roots, have built families, have contributed to their communities of faith, work, and family," and

---

<sup>2</sup> Quotes from *amici* herein are drawn from interviews conducted by counsel in November and December 2017 to provide the Court with a fuller understanding of how DACA has impacted American religious communities.

their “energy, spirit, life, and heart are part of this nation, which can only benefit from their continued participation.”

For many *amici*, these convictions are deeply rooted in their faith and moral principles. Temple Sinai of Washington D.C., for example, believes that “as a Jewish institution, Biblical texts and our Jewish history inform our position on modern day immigration policy. Leviticus 19 explicitly says, ‘When a stranger sojourns with you in your land, you shall do him no wrong.’” St. Luke’s Episcopal Church in Long Beach, California, similarly states that “for us, this is a biblical rather than a political issue.” And as the Catholic mission Maryknoll attests, “recognizing the hardships and struggles of immigrant families, and the tremendous economic and social contributions Dreamers make to the United States, we feel it is unethical to send Dreamers back to countries they hardly know, as well as a senseless loss to our nation.”

For others still, supporting DACA is part of their social justice mission. Christ Church Cathedral in Cincinnati has, in light of the Government’s immigration policy priorities, “focused its social justice concerns on matters of immigration and the impact that deportations or the repeal of DACA will have on God’s children.”

*Amici* and groups like them have, accordingly, objected vocally to the arbitrary repeal of the DACA program. On September 5, 2017, when the

Government announced its decision to terminate DACA, countless religious groups and leaders released statements of condemnation. The United States Conference of Catholic Bishops publicly called the decision “reprehensible,” “unacceptable,” and “a heartbreaking moment in our history that shows the absence of mercy and good will.”<sup>3</sup> The Council on American-Islamic Relations described the move as a “heartless action [that] will only serve to create fear and anxiety for the Dreamers and their loved ones, and will force them back to living in the shadows, rendering them unable to contribute to our nation’s economy.”<sup>4</sup> And *amici* Union for Reform Judaism and Central Conference of American Rabbis declared it “morally misguided and poor public policy,” noting that “Judaism demands that we welcome the stranger and compels us to work for a just immigration system.”<sup>5</sup>

---

<sup>3</sup> United States Conference of Catholic Bishops, *USCCB President, Vice President and Committee Chairmen Denounce Administration’s Decision to End DACA and Strongly Urge Congress to Find Legislative Solution*, <http://www.usccb.org/news/2017/17-157.cfm> (Sept. 5, 2017).

<sup>4</sup> Council on American-Islamic Relations, *CAIR Condemns Trump’s Termination of DACA Program as ‘Pandering to Anti-Immigrant Extremists’*, <https://www.cair.com/press-center/press-releases/14582-cair-condemns-trump-s-termination-of-daca-program-as-pandering-to-anti-immigrant-extremists.html> (Sept. 5, 2017).

<sup>5</sup> Religious Action Center of Reform Judaism, *Reform Jewish Movement Assails White House Targeting of Immigrant Youth*, <https://rac.org/reform-jewish-movement-assails-white-house-targeting-immigrant-youth> (Sept. 5, 2017).



*Amici* agree wholeheartedly with these statements. Rev. Robin Hynicka of *amicus* Arch Street United Methodist Church (“UMC”) in Philadelphia, for example, describes the “mythology surrounding why people migrate” as a campaign to “criminalize immigration” and to paint all immigrants as “bad,” when in fact the “the real reasons for these migrations are not listened to, considered, or understood.” He explains: “From a faith perspective, we take a baptismal vow that states we will resist evil, injustice, and oppression in any form in which it presents itself. The current immigration system and the move to end DACA create unjust circumstances, made manifest in human suffering. The attempt to crack down on Dreamers is a serious, cynical, evil action that has nothing to do with safety or justice. We have a theological and moral obligation to oppose these forces.”

*Amici* include entities that have taken active steps to protect Dreamers. A nation-wide, interfaith network of communities and congregations known as the New Sanctuary Movement, of which many *amici* are a part, have pledged to stand in solidarity with immigrants facing deportation.<sup>6</sup> These groups provide preparedness training and legal counseling and referrals; accompany individuals to immigration hearings; run awareness programs and panel discussions; and conduct advocacy aimed at supporting immigrant communities through the lens of faith. *Amicus* New Mexico Faith Coalition for Immigrant Justice, for example, provides

---

<sup>6</sup> See Sanctuary Movement, <http://www.sanctuarynotdeportation.org/>.

these services “in order to create better immigration laws and a more just system that supports the well-being of all,” and employs two DACA recipients in their three-person office. Similarly, *amicus* New Sanctuary Coalition is an interfaith network working “to reform immigration enforcement practices and policies, both locally and nationally, with a special focus on preserving family unity.” As explained below, many *amici* and congregations like them have offered themselves as places of sanctuary, providing shelter to those targeted for deportation actions.

*Amici* thus oppose with deep conviction the Government’s arbitrary decision to terminate DACA. As institutions of faith with a special interest in servicing vulnerable immigrant populations, *amici* have direct knowledge of the harm that the Government’s actions will cause to them and the people with whom they live, work, and worship.

## **II. TERMINATION OF DACA WILL CAUSE *AMICI*, THEIR CONGREGATIONS, AND THEIR COMMUNITIES IRREPARABLE HARM AND POSES A GRAVE THREAT TO PUBLIC WELFARE**

The early and arbitrary termination of DACA will not only imperil Plaintiffs, it will directly harm *amici* and their congregants, clergy members, staff, clients, and communities.<sup>7</sup> In the words of *amicus* Church Council of Greater

---

<sup>7</sup> Ordinarily, a party seeking a preliminary injunction must show that it—not a third party— will directly suffer harm if the injunction is not granted. *See Winter v. NRDC, Inc.*, 555 U.S. 7, 20 (2008) (“A plaintiff seeking a preliminary injunction must establish that . . . *he* is likely to suffer irreparable harm.”) (emphasis added).

Seattle, “DACA-recipients are our brothers and sisters, relatives, service-providers, congregational members, initiators of small business, and protectors of our communities and nation,” and the Government’s actions would “deprive hopeful and patriotic men and women of the opportunity to exercise their hopes and dreams, to the detriment of the common good.” Like our society at large, faith communities, according to the Albuquerque Monthly Meeting of the Religious Society of Friends (Quakers), “stand to lose the tremendous investment made over many years to bring DACA recipients into adulthood with skills and multicultural perspectives that are sorely needed by the larger community and the nation.”

The Government’s planned actions would cause harm on various levels. First, DACA recipients are vital members of *amici*’s congregations and workforces whose loss of status will not only disrupt their lives, but harm *amici* who benefit from their participation. Second, termination of the DACA program will impair the ability of *amici* and other religiously-affiliated organizations to carry out their missions to help people of all backgrounds and faiths. Third, as institutions of faith and sensitive locations for immigration enforcement purposes, many *amici*

---

With regard to the state and local government Plaintiffs’ claims, however, harm to *amici* equates to harm to the Plaintiffs who, as *parens patriae*, sue on *amici*’s behalf. *Georgia v. Penn. R.R. Co.*, 324 U.S. 439, 447 (1945) (holding that a state may seek an injunction in its *parens patriae* capacity); accord *Cal. ex rel. Lockyer v. Safeway, Inc.*, 355 F. Supp. 2d 1111, 1123 (C.D. Cal. 2005). With respect to the other Plaintiffs’ claims, harm to *amici* is relevant to whether an injunction is in the public interest.

face the grim prospect that following their spiritual calling to provide sanctuary for targeted Dreamers will result in the religious entities themselves being targeted by immigration enforcement authorities, a concern that would increase dramatically with the termination of DACA.

**A. Direct Harm to *Amici* and Their Congregants**

To illustrate the irreparable harm at issue in this case, *amici* provide the Court with the following examples of individual DACA recipients brought to this country as children who have enriched their communities, organizations and congregations.

**Nancy.**<sup>8</sup> Nancy, Associate Rector at *amicus* St. Luke’s Episcopal Church in Long Beach, California, came to the United States from Mexico at age seven. Like many Dreamers, Nancy did not know she was undocumented until her junior year of high school, when she applied to college and learned what a social security number was—and that she did not have one. Nancy describes her life after learning her immigration status as “in the shadows”; she could not get a driver’s license, and could not drive a car for fear of getting pulled over and risking deportation. For a teenager in Los Angeles, this was no idle fear.

---

<sup>8</sup> Declarations from the individual DACA recipients attesting to the information presented here are on file with counsel. The last names of these individuals have been withheld here to protect their privacy.

Nonetheless, Nancy was active in her community. The Episcopal Church served as an extended family during her childhood, and by the time she turned 17 Nancy led the largest youth group in the Episcopal Diocese of Los Angeles. So great was her dedication that the Church paid for her tuition to college and seminary school, where she obtained a Master's of Divinity degree. After obtaining DACA status, Nancy was able to fulfill her dream of becoming an ordained Episcopal minister. Today, Nancy is the associate rector at *amicus* St. Luke's Episcopal Church, and the Diocese of Los Angeles's first Latina leader to have grown up in a Spanish-speaking Episcopal Church and gone on to pursue ordination. At St. Luke's, she is actively involved in immigrants' rights activism and education initiatives.

For Nancy, the Government's announcement on September 5, 2017 was "a moment of complete fear and hopelessness." She and others like her have "made a life here, trusted the system and tried to do things the right way," but now "run the risk that we will be hunted down and sent to a country that we do not know."

**Rafael.** Brought to Los Angeles at three years old, Rafael, an office assistant with *amicus* New Mexico Faith Coalition for Immigrant Justice, was born in Guanajuato, Mexico. Rafael's parents, having risked everything to bring him to the United States, sought to instill in him the values of hard work and education. They succeeded. Rafael completed a Bachelor's Degree with a double major in

History and Chicano Studies from California State University Dominguez Hills while working full time to pay his tuition and support himself. After obtaining DACA status, Rafael went on to obtain a Master's Degree in American Studies at the University of New Mexico, where he is now a Ph.D. candidate and an instructor.

Rafael's parents also instilled in him the values of Catholicism. He believes that faith-based organizations "fill the gaps of social justice and service that many times nation-states do not offer." As such, he works for *amicus* New Mexico Faith Coalition for Immigrant Justice as an office assistant. Rafael is proud to contribute to their work, which he sees as fulfilling community needs and a natural expression of his Catholic faith.

For Rafael, the end of DACA represents drastic and dangerous change. It spells the end of access to the work that he loves and a halt to his career after graduation. Moreover, it means "going back to living in the reality of survival mode," forever uncertain of his place and permanence in his own home, and without opportunity to flourish and grow.

**Andrea.** Andrea is a legal assistant at *amicus* American Friends Service Committee. Andrea was born and baptized in Ecuador, but brought to New Jersey by her parents when she was a year and a half old. Andrea grew up in the Catholic Church. She went to Sunday school, took First Communion, and received

Confirmation at her church in the Newark area, where she continues to volunteer in youth groups and for fundraising activities.

Andrea's parents, like many parents of Dreamers, prioritized her education. Knowing she could not obtain financial aid, Andrea's parents, both union members, carefully saved. After Andrea earned a paralegal degree from community college, her parents put her through Rutgers University's undergraduate program. Nonetheless, until DACA, Andrea's life was one of fear and constraint. She kept her undocumented status secret, and had to refrain from the normal day-to-day activities and jobs that her friends freely engaged in.

Andrea graduated from Rutgers *summa cum laude*. After she obtained DACA status, she was hired as a paralegal at a law firm, and was proud to have a job and a salary. Andrea's dream is to go to law school in the United States. For her, the end of DACA puts her dream to a halt and threatens to send her to Ecuador, a place she has never set foot since she was an infant. In the face of this peril, Andrea maintains, "I love this country and I can't imagine living elsewhere."

\* \* \*

The harm that these individuals would suffer as a result of their loss of DACA status is readily apparent. *See Nunez v. Boldin*, 537 F. Supp. 578, 587 (S.D. Tex. 1982) ("Deportation to a country where one's life would be threatened obviously would result in irreparable injury."); *Kalaw v. Ferro*, 651 F. Supp. 1163,

1167 (W.D.N.Y. 1987) (enjoining deportation proceeding and finding irreparable harm because “petitioner’s deportation would make her ineligible for any subsequent application for legalization”). *Amici* would be harmed as well; not only do people like Nancy, Rafael and Andrea contribute richly to religious and faith-based organizations through their own individual efforts, they serve as mentors and inspire others to give back to institutions from which they have benefitted. If the Termination Memo goes into effect, nearly 800,000 Dreamers—many with stories similar to the three detailed above—will be forced out of the country or into hiding. *Amici* will suffer incalculable harm if they are deprived of the contributions and talents of these young congregants and community members.

Moreover, as *amici* know from their work in other parts of the world, Dreamers deported would face tremendous challenges and even physical danger. For example, Gerry Lee and others from *amicus* Maryknoll Office for Global Concerns have lived and worked with impoverished families in Mexico, El Salvador, Guatemala, and other countries to which DACA recipients face deportation. In Haiti, for example, “Maryknoll Sisters have witnessed the bare struggle for post-disaster survival in the massive slums of Cite Soleil, where they help residents subsist from gardens grown in discarded tires on turf fought over by rival gangs.” In El Salvador, a Maryknoll Lay Missioner witnessed “the anger and pain that pervades communities preyed upon by powerful gangs, where immediate



survival forces youth to face grim choices between lives of drugs and guns—or escape.” In Guatemala, a Maryknoll Father reports on the “rising rates of femicide” and sums up what motivates millions of rural migrants in a single word: “desperation.” And along the U.S.-Mexico border, Maryknoll Missioners hear daily the “stories of desperation from the countries to which many Dreamers might be returned,” namely, that “poverty, starvation, extortion, sexual assault, gang violence, and political oppression are among the conditions cited as triggers to leave.” In one such encounter in Nogales, Sonora, “a man travelling north with his son from Honduras merely pointed south and said, ‘There is no life there anymore.’” Children raised in America knowing no other country should not have to face deportation into such conditions.

**B. Impairment of *Amici*’s Ability To Carry Out Their Missions**

It goes without saying that religious and faith-affiliated organizations such as *amici* play a vital role in society. Countless lives have been uplifted and enriched by the spiritual guidance as well as the material and legal assistance these institutions provide. Immigrants and their families—including children brought to this country at a young age—are among the groups that have benefitted most from the support furnished by *amici* and similar organizations. By aiding such vulnerable individuals, faith-based organizations including *amici* have helped to

make their entire communities more prosperous, united and civically engaged than they otherwise would be.

Implementation of the Termination Memo would undermine these efforts by making it virtually impossible for *amici* to continue their outreach to Dreamers and their families, causing *amici* irreparable harm. *See Hawaii v. Trump*, 859 F.3d 741, 782-83 (finding the “State’s inability to assist in refugee resettlement” to be irreparable harm) (9th Cir.), *vacated on other grounds by Trump v. Hawaii*, 138 S. Ct. 377 (2017); *Valle Del Sol Inc. v. Whiting*, 732 F.3d 1006, 1029 (9th Cir. 2013) (finding irreparable harm where “organizational plaintiffs have shown ongoing harms to their organizational missions”).

*Amici* cannot reach people in need if those people are hiding in the shadows or have been deported. If the Termination Memo is implemented, *amici* and similarly-situated organizations will lose their ability carry out their core mission to assist those in the greatest need of help. This will result in the needless suffering not only of at-risk individuals, but of their communities as a whole.

**C. As Sensitive Locations for Immigration Enforcement Purposes, Some *Amici* Will be Called Upon to Provide Sanctuary While at the Same Time Risking Being Targeted for Immigration Raids**

Finally, religiously-affiliated organizations like *amici* occupy a unique position in matters of immigration enforcement, particularly with respect to DACA. Pursuant to an October 2011 memorandum by then-ICE Director John

Morton, ICE is not to engage in immigration enforcement actions such as arrests, interviews, searches, or surveillance at churches, synagogues, mosques, or other houses of worship, unless exigent circumstances or other law enforcement purposes exist, or if prior approval is obtained (the “ICE sensitive locations policy”).<sup>9</sup> In 2016, while the prior administration was still in office, then-Secretary of Homeland Security Jeh C. Johnson publicly reiterated that “when enforcing the immigration laws, our personnel will not, except in emergency circumstances, apprehend an individual at a place of worship, a school, a hospital or doctor’s office or other sensitive location.”<sup>10</sup> The ICE sensitive locations policy remains in effect today, at least as an official matter.<sup>11</sup>

The ICE sensitive locations policy recognizes that houses of worship are sacred spaces of sanctuary and peace, where community members can go and be without fear of harassment or arrest. Many *amici* and others like them proudly

---

<sup>9</sup> Memorandum from John Morton, Director, U.S. Immigration and Customs Enforcement to Field Office Directors, Special Agents in Charge, and Chief Counsel (Oct. 24, 2011), <https://www.ice.gov/doclib/ero-outreach/pdf/10029.2-policy.pdf>. The sensitive locations policy puts the same restrictions on raids at schools, hospitals, and other public settings.

<sup>10</sup> U.S. Dep’t of Homeland Security, Statement by Secretary Jeh C. Johnson on Southwest Border Security, <https://www.dhs.gov/news/2016/02/02/statement-secretary-jeh-c-johnson-southwest-border-security> (Feb. 2, 2016).

<sup>11</sup> *See* U.S. Immigration and Customs Enforcement, FAQ on Sensitive Locations and Courthouse Arrests: Does ICE’s policy sensitive locations policy remain in effect?, <https://www.ice.gov/ero/enforcement/sensitive-loc>.

fulfill that role and have pledged to offer their churches, synagogues, and mosques as sanctuaries to those at risk of deportation. Temple Sinai DC, Christ Church Cathedral in Cincinnati, St. Luke's in Long Beach, Arch Street UMC in Philadelphia, Albuquerque Friends Meeting, the many members of *amici* New Mexico Faith Coalition for Immigrant Justice and New Sanctuary Coalition, and others have publicly declared their status as sanctuary congregations. These organizations maintain dedicated, furnished space for visitors who need protection, and rely on their congregants for support in doing so.

In each case, the decision to become a sanctuary congregation is made after careful discussion among congregations and communities, and reflects broad religious consensus on this issue. The Albuquerque Friends Meeting, for example, when called upon to respond to an urgent need for sanctuary by a community member, convened their members and attenders. “Through a process of deep discernment together—and in commitment to our Quaker values of Equality and Community—we were led to a profound sense of Spiritual Unity, meaning we were ‘One in the Spirit,’” and the Meeting collectively committed to providing sanctuary. Many *amici* reported that these decisions, while weighty, were not difficult to make. When Arch Street UMC was called upon to house a man in danger of immigration detention, “the conversation among the congregation wasn’t ‘will we do this,’ but how?” They provided sanctuary to the man in question for

11 months. In Phoenix, Shadow Rock United Church of Christ provided sanctuary to a man facing deportation whose wife is pregnant and young son is in the midst of leukemia treatment. The church's reverend stated in a public interview that the man "shouldn't be prosecuted," but rather "lifted up, used as an example of what it means to be a father."<sup>12</sup>

Under the current administration, however, the parameters and application of the ICE sensitive locations policy are increasingly in doubt. ICE has already begun to target areas adjacent to places of worship for enforcement actions, to worrisome effect. For example, earlier this year on a freezing cold morning in Alexandria, Virginia, a dozen ICE agents surrounded a group of Latino men as they emerged from a church hypothermia shelter where they had spent the night. Six men were arrested and taken away in vans.<sup>13</sup> After church leaders demanded and were refused the names and locations of the men taken, Governor Terry McAuliffe and Senator Tim Kaine both sent letters to ICE inquiring about the raid

---

<sup>12</sup> CBS News, *Undocumented immigrant, father of leukemia patient, takes refuge in Phoenix church*, <https://www.cbsnews.com/news/undocumented-immigrant-father-of-leukemia-patient-takes-refuge-in-phoenix-church/> (Feb. 12, 2018, 7:20 AM).

<sup>13</sup> Julie Carey, NBC Washington, *ICE Agents Arrest Men Leaving Fairfax County Church Shelter*, <https://www.nbcwashington.com/news/local/ICE-Agents-Arrest-Men-Leaving-Alexandria-Church-Shelter-413889013.html> (Feb. 15, 2017).

and their enforcement policies near churches. ICE responded to neither.<sup>14</sup> In suburban Illinois, ICE agents tricked a worshiper into leaving a church service—by texting him from his cousin’s cell phone about a fictional car accident—and arrested him at a neighboring McDonald’s. They arrived in unmarked cars and wore vests that said “Police.” A retired ICE supervisor, interviewed after-the-fact, praised this strategy as “actually . . . quite creative.”<sup>15</sup>

ICE has shown a propensity to target sensitive or controversial locations other than religious institutions as well. In Charlotte, North Carolina, ICE conducted raids and arrests within two miles of a predominantly Latino elementary school.<sup>16</sup> Students witnessed the arrests as they passed by in school busses.<sup>17</sup> In El

---

<sup>14</sup> Alex Emmons, *The Intercept*, *Targeting a Sanctuary: After ICE Stakes Out a Church Homeless Shelter, Charities Worry Immigrants Will Fear Getting Help*, <https://theintercept.com/2017/02/27/after-ice-stakes-out-a-church-homeless-shelter-charities-worry-immigrants-will-fear-getting-help/> (Feb. 27, 2017).

<sup>15</sup> Odette Yousef, *WBEZ 95.1 Chicago*, *Amid Deportation Push, Suburban Church Grapples with Loss*, <https://www.wbez.org/shows/wbez-news/amid-deportation-push-suburban-church-grapples-with-loss/3d269fc3-04e7-4604-bae4-a376a37410c9> (Feb. 15, 2016).

<sup>16</sup> Tina Vasquez, *Rewire*, *Have Trump’s Mass Deportations Begun? Immigration Arrests Reported Around the Country*, <https://rewire.news/article/2017/02/10/trumps-mass-deportations-begin-immigration-arrests-reported-around-country/> (Feb. 10, 2017).

<sup>17</sup> *Qué Pasa Mi Gente*, *Arrestos de ICE cerca de escuela elemental de mayoría hispana*, <https://charlotte.quepasanoticias.com/noticias/ciudad/local/arrestos-de-ice-cerca-de-escuela-elemental-de-mayoria-hispana> (Feb. 9, 2017), *translation available at* <https://translate.google.com/translate?hl=en&sl=es&tl=en&u=https%3A%2F%2F>

Paso, Texas, a Latina woman was taken into custody by ICE agents dressed in plain clothes after she left a courtroom in a county courthouse. The criminal complaint filed against her indicates that ICE knew she was living at a domestic and sexual abuse resource center.<sup>18</sup>

These incidents indicate that instead of abiding by the spirit of the sensitive locations memorandum—that is, to *avoid* immigration enforcement at sensitive locations—ICE is using houses of worship and other locations as lures for easy, unsuspected surveillance and arrest. This puts *amici* in the untenable and unacceptable position of at once heeding their faith-based calling to provide sanctuary while at the same time attracting the attention of those who would do harm to the people *amici* seek to protect. This crisis of conscience has sewn fear and anxiety among *amici* and their congregants and supporters. These concerns will be greatly exacerbated if the Termination Memo goes into effect and the DACA program is terminated.

---

harlotte.quepasanoticias.com%2Fnoticias%2Fciudad%2Flocal%2Farrestos-de-ice-cerca-de-escuela-elemental-de-mayoria-hispana.

<sup>18</sup> ABC-7 KVIA, *Which places are considered 'sensitive locations'?*, <http://www.kvia.com/crime/which-places-are-considered-sensitive-locations/338319025> (Feb. 16, 2017).

### **III. THIS COURT SHOULD AFFIRM THE NATIONWIDE INJUNCTION UNDER THE ADMINISTRATIVE PROCEDURE ACT**

As illustrated by the stories detailed in the preceding sections, the Termination Memo will cause irreparable harm to individuals from all walks of life and across the entire United States. The Termination Memo will affect nearly 800,000 DACA grantees along with their family members, communities, and faith groups. In order to address fully the scope of the harm the Termination Memo has inflicted and will continue to cause, this Court should affirm the district court's injunction of the Memo nationwide and in its entirety.

Contrary to the Government's argument, injunctive relief should not be limited to "particular DACA recipients whose loss of DACA would cognizably injure plaintiffs."<sup>19</sup> The "systemwide impact" the Termination Memo will have warrants a "systemwide remedy." *Lewis v. Casey*, 518 U.S. 343, 359 (1996) (internal quotation marks omitted). When a court determines that an executive action facially violates statutory constraints, a comprehensive injunction that sets aside the entire action is the "ordinary result." *Nat'l Mining Ass'n v. U.S. Army Corps of Eng'rs*, 145 F.3d 1399, 1409 (D.C. Cir. 1998) (the "result is that [the action is] vacated—not that [its] application to the individual petitioners is proscribed") (internal quotation marks omitted). This is especially appropriate

---

<sup>19</sup> Appellants' Opening Brief, (Case No. 18-15128 Dkt. 17), at 48-57.



where, as here, Plaintiffs challenge not only the application of an action “in an illegal manner on a particular occasion” but instead generally challenge the validity of a policy “of broad applicability.” *Id.* (quoting *Lujan v. Nat’l Wildlife Fed’n*, 497 U.S. 871, 913 (1990) (Blackmun, J., dissenting on other grounds)). Any other outcome would lead to the unjust result of halting the Termination Memo’s effects for only a fraction of persons impacted by it.

In fact, a limited injunction of this nature would “merely . . . generate a flood of duplicative litigation.” *Id.*; *see also Harmon v. Thornburgh*, 878 F.2d 484, 495 n.21 (D.C. Cir. 1989) (“When a reviewing court determines that agency regulations are unlawful, the ordinary result is that the rules are vacated—not that their application to the individual petitioners is proscribed.”). The Termination Memo is precisely the type of agency action of “broad applicability” that should be enjoined in total, not least in order to avoid unnecessary and repetitive litigation and promote judicial economy. *See Nat’l Mining Ass’n*, 145 F.3d at 1409 (refusal to sustain broad injunction where adversely impacted individuals can each challenge the agency action “is likely merely to generate a flood of duplicative litigation”). By enjoining the implementation of the Termination Memo in its entirety, this Court would ensure, in the most efficient manner possible, that all who are harmed by this unlawful Government action are able to obtain the relief they deserve.

Accordingly, this Court should find that the Termination Memo is unlawful on its face and affirm the injunction of the Memo in full, not merely in its application to particular petitioners represented in this litigation.

### CONCLUSION

For the foregoing reasons, *amici* respectfully urge the Court to affirm the preliminary injunction granted below.

Respectfully submitted,  
Dated: March 20, 2018

**PATTERSON BELKNAP WEBB &  
TYLER LLP**

By: /s/ Steven A. Zalesin

Steven A. Zalesin  
Adeel A. Mangi  
Michael N. Fresco  
Zachary Kolodin  
1133 Avenue of the Americas  
New York, NY 10036-6710  
Telephone: 212.336.2000  
Facsimile: 212.336.2222

**MUSLIM ADVOCATES**

Johnathan Smith  
Sirine Shebaya  
Juvaria Khan  
P.O. Box 66408  
Washington, DC 20035  
Telephone: 202.897.2622

Attorneys for *Amici Curiae* 119 Religious  
Organizations

**Certificate of Compliance With Type-Volume Limit, Typeface Requirements,  
and Type-Style Requirements**

I certify that:

1. This document complies with the type-volume limit of Fed. R. App. P. 29(a)(5), 32(a)(7)(B), and Circuit Rule 32-1 because, excluding the parts of the document exempted by Fed. R. App. P. 32(f), this document contains 6,154 words.
2. This document complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6) because this document has been prepared in a proportionally spaced typeface using Microsoft Word 2010 in 14-point Times New Roman font.

Dated: March 20, 2018

**PATTERSON BELKNAP WEBB & TYLER  
LLP**

**MUSLIM ADVOCATES**

By: /s/ Steven A. Zalesin

Attorneys for *Amici Curiae* 119 Religious  
Organizations

**CERTIFICATE OF SERVICE**  
**CM/ECF FILING/SERVICE**

U.S. Court of Appeals Docket Nos.: 18-15068, 18-15069, 18-15070,  
18-15071, 18-15072, 18-15128, 18-15133, 18-15134

I, Steven A. Zalesin, hereby certify that on March 20, 2018, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit by using the appellate CM/ECF system.

Participants in the case who are registered CM/ECF users will be served by the appellate CM/ECF system.

Dated: March 20, 2018

**PATTERSON BELKNAP WEBB &  
TYLER LLP**

**MUSLIM ADVOCATES**

By: /s/ Steven A. Zalesin

Attorneys for *Amici Curiae* 119  
Religious Organizations

**18-15068, 18-15069, 18-15070, 18-15071, 18-15072, 18-15128, 18-15133, 18-15134**

---

IN THE  
**United States Court of Appeals**  
 FOR THE NINTH CIRCUIT

---

REGENTS OF THE UNIVERSITY OF CALIFORNIA; JANET NAPOLITANO, In her official capacity as President of the University of California; STATE OF CALIFORNIA; STATE OF MAINE; STATE OF MINNESOTA; STATE OF MARYLAND; CITY OF SAN JOSE; DULCE GARCIA; MIRIAM GONZALEZ AVILA; SAUL JIMENEZ SUAREZ; VIRIDIANA CHABOLLA MENDOZA; JIRAYUT LATTHIVONGSKORN; NORMA RAMIREZ; COUNTY OF SANTA CLARA; SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 521,

*Plaintiffs-Appellees,*

—v.—

UNITED STATES OF AMERICA; DONALD J. TRUMP, in his official capacity as President of the United States; U.S. DEPARTMENT OF HOMELAND SECURITY; KIRSTJEN NIELSEN, In her official capacity as Acting Secretary of the Department of Homeland Security,

*Defendants-Appellants.*

---

ON APPEAL FROM THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 HON. WILLIAM ALSUP, CASE NO. 3:17-CV-05211-WHA

---

**APPENDIX TO BRIEF OF *AMICI CURIAE* 119 RELIGIOUS  
 ORGANIZATIONS IN SUPPORT OF PLAINTIFFS-APPELLEES FOR  
 AFFIRMANCE OF PRELIMINARY INJUNCTION**

---

STEVEN A. ZALESIN  
 ADEEL A. MANGI  
 MICHAEL N. FRESCO  
 ZACHARY KOLODIN  
 PATTERSON BELKNAP WEBB  
 & TYLER LLP  
 1133 Avenue of the Americas  
 New York, New York 10036  
 (212) 336-2000

JOHNATHAN SMITH  
 SIRINE SHEBAYA  
 JUVARIA KHAN  
 MUSLIM ADVOCATES  
 P.O. Box 66408  
 Washington, DC 20035  
 (202) 897-2622

*Attorneys for Amici Curiae 119 Religious Organizations*

---

## **APPENDIX A**

### **IDENTITY AND INTERESTS OF AMICI**

#### **1. Albuquerque Insight Meditation Center**

Albuquerque Insight Meditation Center (AIMC) is a community that aspires to end suffering through the realization of the Buddha's teachings. AIMC extends refuge to all who seek the liberating teachings of the Buddha and offers non-fear, protection and compassion to all living beings. Immigrants covered by DACA fear the loss of its protection. Even though the USA is their home, they face the risk of being deported to the countries where they were born and where their lives may be in danger. DACA recipients are part of our community, they are our neighbors, our friends, our colleagues and our members. We stand with them, for their safety, protection and the end of suffering.

#### **2. Albuquerque Mennonite Church**

Part of Mennonite Church USA, Albuquerque Mennonite Church is a community of over 150 Mennonites who believe strongly in the connections between peacemaking and justice, and the Kingdom of God that Jesus taught about and lived out. Albuquerque Mennonite Church holds that every person is created in God's image, valued without regard to origin, sexual identity, affiliation, or status. We are a Christian community of peace and justice, including love and advocacy for our siblings with and without status, especially those struggling to maintain DACA status.

#### **3. Albuquerque Monthly Meeting of the Religious Society of Friends (Quakers)**

Albuquerque Monthly Meeting of the Religious Society of Friends is a Quaker Meeting for Worship in Albuquerque, New Mexico, affiliated with Intermountain Yearly Meeting, a community of Quaker Meetings and individual Friends situated within the Intermountain West. In unity with the shared testimonies of Friends within IMYM, we affirm that "Our witness to the world comes from our perception of the Divine Spirit moving through us (IMYM Faith and Practice, Advice 1 on Integrity, p. 130)." "Recognizing the oneness of humanity in God, we affirm fellowship with all people (Id., Advice 2 on Integrity,, p. 131)." "We affirm that our first allegiance is to our experience of the Divine. If this conflicts with any compulsion of the state, our country is served best when we remain true to our higher loyalty (Id., Advice 1 on Peace, p. 132.)." Indeed, "We

[must] refuse to join in actions that denigrate others or lead to their victimization (Id., Advice 4 on Peace, p. 133.).” Albuquerque Meeting has long been troubled by the treatment of refugees and migrants within the US and in the borderlands. In 2014, we committed ourselves “. . . to assure that the humanity of every migrant to our borders is honored and that all are treated with compassion and dignity, regardless of what their legal status may ultimately be determined to be.” (AMM minute 2014.8.3). We care about DACA recipients because they are threatened with an assault on their humanity. We cannot be faithful to the Light that Spirit has granted us and ignore what is being done in our name to these brothers and sisters.

#### **4. American Association of Jewish Lawyers and Jurists (AAJLJ)**

The AAJLJ is a membership association of lawyers and jurists open to all members of the professions regardless of religion. It is an affiliate of the International Association of Jewish Lawyers and Jurists, which is based in Israel and was founded by the late Justice Arthur Goldberg of the United States Supreme Court and the late Justice Haim Cohen of the Supreme Court of Israel. The mission of the AAJLJ includes representation of the American Jewish Community in regard to legal issues and controversies that implicate the interests of that community. The Association carries out that mission through advocacy in the public arena and in the courts, educational programs, and representation of individuals whose religious and other human rights have been threatened or abridged. As a minority that has historically faced exclusion from the United States and other countries during times of dire peril, the Jewish community strongly supports the role of the United States as a refuge from tyranny, war and oppression.

#### **5. American Baptist Churches of Metropolitan New York**

The ABCMNY region is unique among other regions in the American Baptist Churches USA because of its very wide theological diversity, racial-ethnic identity mix, and the breadth of languages spoken among our 185 churches located in the various boroughs, counties and neighborhoods within the NY metro area. On any given Sunday, worship is conducted and fellowship occurs in 8-12 spoken languages. Toward our common mission, our ABCMNY vision documents include the following declarations: “The Great Commission, as understood in Matthew 28:16f, continues to motivate and call us to invite persons, who are near and far as suggested in Acts 1:6-8, to receive and live in the hope of the good news of Christ. In covenant, American Baptists in Metro New York will endeavor to continue to follow Jesus, to call persons to deeper discipleship, and to work for justice with

compassion particularly for and with communities and peoples who have been oppressed or suppressed through human actions.”

Our mission statement asserts that “We seek to welcome others like Jesus welcomes us, to simply serve God within our complex city, to respond in times of need, to live together peaceably amidst our differences, to grow deeper in inclusion and greater in connection, and to glorify God in all of our endeavors.” Our positions as a region on DACA include the assertion that the over 800,000 young people, known as “Dreamers” who consider the United States as their national home contribute to this nation and its economy and spirit and function as citizens of the United States. ABCMNY, among other things, calls on the US government to protect and expand DACA and similar programs, and end the mass deportation of undocumented immigrants. It is in the spirit of our identify and work that we gladly join with others in this needed intervention.

## **6. American Friends Service Committee**

The American Friends Service Committee (“AFSC”) is a Quaker organization whose work is shaped by its spiritual framework and based on the belief in the worth of every person, and faith in the power of love to overcome violence and injustice. Founded in 1917, AFSC has programs throughout the United States that work with immigrants, including many DACA grantees, through legal representation, leadership training, community organizing, and policy advocacy. AFSC's offices in Florida, Iowa and New Jersey represent and provide a voice for many vulnerable immigrant populations, including immigrant detainees, survivors of domestic violence and other crimes, asylum seekers, individuals who have faced long struggles to obtain legal status, and immigrant children and youth. These three programs have represented hundreds of DACA grantees since the DACA program was introduced in 2012. In addition, AFSC programs across the United States have engaged in organizing and advocacy with and on behalf of young immigrants in their quest for a path to a permanent and secure immigration status for themselves, their families and their communities.

## **7. Ansche Chesed, New York City**

We are a Conservative synagogue on Manhattan’s Upper West Side, ritually traditional, intellectually vibrant and socially progressive. We believe in protecting all the vulnerable of society, those who need emotional, spiritual and economic sustenance in the face of those who would exploit them. And we believe that society needs Dreamers.



## **8. Arch Street United Methodist Church**

Arch Street United Methodist Church (ASUMC) is an historic congregation located in the Center Square neighborhood of Philadelphia. Established in 1862 – before Philadelphia’s City Hall was built, ASUMC is located at the crossroads of center city and, as such, has one of the most diverse congregations in Philadelphia. ASUMC’s vision is to be a welcoming Christian community that inspires openness, understanding and reconciliation both within the congregation and in the community-at-large. Our mission is to love God and neighbor by nurturing individuals on their spiritual journeys, encouraging creativity in faithful service, strengthening relationships and promoting justice. ASUMC is a multi-racial, multi-ethnic, multi-class, LGBTQIA and immigrant welcoming faith community. As a founding member of POWER (Philadelphians Organized to Witness Empower and Rebuild) an interfaith network of 60 congregations, ASUMC is in constant contact and community with Muslims, Jews, Roman Catholics, other Protestants, Quakers and Ethical Humanists. Through the New Sanctuary Movement and the Nationalities Service Center of Philadelphia, ASUMC further expands its connections with persons from all over the world, representing a wide variety of cultural and religious expressions. ASUMC is a seasoned interfaith and cross-cultural partner and finds great joy in building and sustaining compassionate connections across all borders.

Arch Street United Methodist Church is pleased to sign on to the DACA Amicus Brief on Behalf of Religious Organizations. We do so an act of faith in following the teaching of our sacred texts to welcome the stranger and to love our neighbor. In addition, we hold the strong opinion that the termination of DACA and the deportation of all those under the provisions of DACA would be inhumane, unjust and in direct violations of basic human rights.

## **9. Association of Muslim American Lawyers**

The Association of Muslim American Lawyers (AMAL) seeks to assist the Muslim-American community’s exercise of legal rights through education; encourage entry into the legal profession; assist members in their professional development; promote the administration of justice; benefit the community with legal resources and services; identify and explore themes common to American and Islamic jurisprudence; and promote the highest standards of professionalism, integrity and honor amongst AMAL members.

America needs talent. Children who came to this country raised and educated in the United States are already part of the American fabric. They

represent what is best about America and they are essential to our future. We stand with our dreamers, leaders across the business, civic, religious, and non-profit sectors to defend this important cause.

#### **10. Cabrini Immigrant Services of NYC**

Cabrini Immigrant Services of NYC provides supportive services to the immigrant community to encourage economic independence and social empowerment, foster individual growth and development, and promote self-determination for immigrant families, children, and youth. We are a faith-based agency and seek to emulate the spirit of Mother Cabrini in our work.

The organization is deeply committed to the fight for the Dream Act and has participated in lobby days in Washington, local rallies, phone banks, and more. Additionally, over the past year the organization assisted nearly 100 clients in submitting new and renewal applications for DACA, and continues to offer renewal services. Dreamers are an integral part of our community. We have seen firsthand the incredible contributions DACA recipients have made to their families, communities, and society as a whole. We believe it is both our moral duty and in the nation's best interest to protect Dreamers and allow them to fully contribute to society. For these reasons, we denounce the arbitrary rescission of the DACA program, which would cause irreparable harm to the immigrant communities we serve and our nation as a whole. We work to honor the legacy of Mother Cabrini and the Catholic Social Teachings on the dignity of all persons by standing in solidarity with all immigrants and advocating for a path to citizenship for all Dreamers.

#### **11. Campus Ministry of Roman Catholic Archdiocese of New York at Hostos and Bronx Community College of City University of New York**

The Catholic Campus Ministry and Interfaith Department, funded by the Roman Catholic Archdiocese of NY since the 1970's at the community colleges of CUNY, serves the traditional immigrant base that bodes well for the future of the NY metropolitan area and our great country. Most of the 13,500 students of both colleges are either immigrants or sons and daughters of people of color and accents. We DO have DACA students. They are extremely hardworking and well-motivated. They WANT to be US citizens—and would be good ones!

## **12. Capital Area Muslim Bar Association**

The Capital Area Muslim Bar Association (CAMBA) is a voluntary bar association in the Washington, DC metro area with a diverse membership. CAMBA's mission includes fostering a sense of fellowship amongst diverse Muslim legal professionals and amplifying our collective voice to impact legal issues affecting the Muslim community. CAMBA's objectives include addressing legal issues affecting the community at large and their related impact on the Muslim American community, and educating and advocating for constitutional, civil, and human rights for all persons.

## **13. Catholic Charities of the Diocese of Stockton**

For over 70 years, Catholic Charities of the Diocese of Stockton has provided social services to people in San Joaquin, Stanislaus, Calaveras, Tuolumne, Alpine, and Mono counties, and throughout the years, it has served as a sign of hope in local communities for people of all ages, religions, and races. These services are offered to those in need, regardless of their religious beliefs, because our work is grounded in the dignity of each person and in the building of a just and compassionate society, especially for the most vulnerable among us. In keeping with our work and mission, we believe that the termination of DACA without an adequate replacement would undermine our communities and would cause them great harm. For these reasons, we join the Religious Organizations amicus brief.

## **14. Catholic Charities Community Services of the Archdiocese of New York**

Since 1949, Catholic Charities Community Services of the Archdiocese of New York (CCCS) has provided direct human and legal services to over 170,000 people each year from all parts of New York City and the Lower Hudson Valley. These services are offered to all New Yorkers in need, regardless of their religious beliefs, because our work is grounded in the dignity of each person and in the building of a just and compassionate society, especially for the most vulnerable among us. CCCS is a leading provider of immigration legal, resettlement, and integration assistance in its service area, providing direct legal services to individuals, families, workers, and children seeking stability and reunification, including application assistance, clinical consultation, and direct court representation, hotline and referral information to over 70,000 callers each year, case management assistance, reception, reunification integration, employment and ESL assistance to refugees, asylees and other documented and undocumented

newcomers, and to all those seeking protection, including over 3,000 unaccompanied minors each year.

#### **15. Catholic Legal Immigrant Network, Inc.**

The Catholic Legal Immigration Network, Inc. (“CLINIC”), a national religious organization created in 1988 by the United States Conference of Catholic Bishops, embraces the Gospel value of welcoming the stranger and promotes the dignity and protects the rights of immigrants in partnership with a dedicated network of Catholic and community legal immigration programs. CLINIC’s network includes approximately 330 faith and community-based immigration legal programs in more than 400 cities, and employs roughly 1,400 legal representatives, including attorneys, Department of Justice-accredited representatives and paralegals who serve hundreds of thousands of citizens and immigrants each year.

CLINIC has a substantial interest in the Court’s resolution of this case because the issues this Court will decide have a direct impact on the work of CLINIC’s network and the immigrants it serves. Within CLINIC’s network, the majority of legal immigration programs provide DACA and related immigration services and have seen the positive benefits of this program on their clients. Further, for many of the programs, DACA services represent a significant amount of program revenue. Consequently, CLINIC has a substantial interest in ensuring that DACA recipients are able to safely remain with their families, in their schools and communities, and employed.

#### **16. Catholic Legal Services, Archdiocese of Miami, Inc.**

Catholic Legal Services, Archdiocese of Miami, Inc (“CLS”) is a not-for-profit corporation with the express mission of providing: “Legal Representation and Immigration Services for those who come to South Florida from foreign lands.” Currently, it is the largest provider of pro bono and low-cost immigrations services in the State of Florida. Over two thousand migrants and refugees seek the services of CLS each month. Among them, mothers longing to be reunited with their children; political and religious refugees seeking security; religious workers offering their ministry to our faith communities; battered spouses and their children searching for safety; and, of particular note, individuals who entered as children and remained to pursue the dream of legal status in the United States. CLS has represented hundreds of recipients of the Deferred Action for Childhood Arrivals Program since its inception in 2012.

## **17. Central Pacific Conference of the United Church of Christ**

The Central Pacific Conference (CPC) is a community of United Church of Christ congregations in Oregon, southern Idaho and southern Washington. In this family of 45 congregations, our shared commitment is to ministry and mission. The CPC provides spiritual and material resources and encouragement to all our 7,600 members. We put purposes and programs into action by drawing on the experience and talents of all the conference members, both lay people and clergy. The CPC assists and encourages local congregations and their members in working together to explore, communicate, support and pursue the ministry and mission of the church, and provides a channel for effective relationships with the UCC and with other faith communities.

At its Annual Meeting in September 2016, the Central Pacific Conference of the United Church of Christ declared itself to be an "Immigrant Welcoming Conference" which encourages the development of policies dedicated to facilitating the respectful welcome and inclusion of all immigrants into Oregon, Idaho, and Washington. The Central Pacific Conference was a co-sponsor of the United Church of Christ General Synod Resolution calling upon the United Church of Christ to declare itself an Immigrant Welcoming Denomination; the resolution passed with an overwhelming vote with 97% of delegates in favor.

## **18. Church Council of Greater Seattle**

The Church Council of Greater Seattle is a membership organization of 320 congregations from 16 Christian denominations in Martin Luther King Jr. County and South Snohomish County in the State of Washington. Founded in 1919, we have worked for nearly a century to forge ecumenical and interreligious relationships and to serve vulnerable and marginalized populations in our midst. We believe in the inherent dignity and worth of every human being as a child of God. We believe that God's love has no exclusions. We are proud to have opposed the internment of Japanese-Americans during World War II and to have continued to minister to them during and after the war. We played an important role in ending redlining in the City of Seattle as part of our legacy of seeking a society built upon equity and social justice.

DACA is a win-win that has allowed families to stay intact, while creating a pathway forward for many in order to strengthen our economy and build up our community fabric. Removing DACA will tear apart grantees from loved ones. It is our ministry and responsibility to not allow the marginalization of this community

and to affirm their voices and self-determination for an inclusive, viable future, which will be beneficial for the integrity of the United States. The moral and humane solution is to allow those who have benefitted from DACA to become United States citizens toward the end of Comprehensive Immigration Reform.

#### **19. Church of Our Redeemer in Lexington, Massachusetts**

The Church of Our Redeemer in Lexington, Massachusetts serves a parish community made up of people from many nations and ethnicities. We seek to foster a thriving community in Lexington and beyond by building relationships across differences and forming ministers of the Gospel. The decision to end DACA would impact individuals and families who reside in our parishes and broader communities. Ending residency for those currently protected by the DREAM Act would move our country further away from the principles of justice that we seek as people of faith. We are committed, as people of faith, to working together with other responsible leaders to justly address the immediate needs of the people affected by this action and ensure long-term solutions for communities impacted by exclusionary policies. We stand with Dreamers in Massachusetts and across America and implore the courts to represent those most impacted by refusing to put the termination memo into effect.

#### **20. Church of Our Saviour/La Iglesia de Nuestro Salvador (Cincinnati, Ohio)**

The Church of Our Saviour/La Iglesia de Nuestro Salvador is an Episcopal parish in Cincinnati Ohio, with a far-reaching ministry beyond its central urban location.

We have been engaged with immigrants and refugees from Latin America for over twenty-five years; and have been a bilingual parish since 2006. The immigrants and refugees with whom we stand are esteemed members of our community, contributing to our society. The US is now their home. For many of them, deportation would be a risk of grave danger or even death. Besides leaving dependents here who would then need public assistance, their processing, prosecution, incarceration and deportation at taxpayer expense is a cruel and mindless waste, unworthy of the values of this country.

#### **21. Congregation B'nai Jeshurun (New York City)**

For nearly two centuries, Congregation B'nai Jeshurun (NYC) has been at the forefront of American Jewish life. As we move into our third century, our

vision is focused on the spiritual work of transformation: of ourselves, our community of nearly 1700 member households, and of the larger world. We believe that as a faith community we are called upon to hold ourselves, each other, and our elected leaders accountable for sustaining the core values of our nation, and to bring to bear the moral values of our Jewish tradition and teachings for the benefit of all. For many years, these beliefs have manifest through engagement in the growing global refugee crisis, and efforts to assist immigrants and refugees in New York City. As such, we strongly support the goals of the DACA program, and we are proud to join this brief to help ensure that the rights of all immigrants and refugees, regardless of race, religion, gender identity, sexual orientation, financial status, or country of origin, are treated fairly and equally, and with respect and dignity, by the American government.

## **22. Congregation Beit Simchat Torah**

Congregation Beit Simchat Torah (CBST) is a bold spiritual community of love and resistance that embodies a progressive voice within Judaism. Founded in 1973, CBST attracts and welcomes gay men, lesbians, bisexuals, transgender, queer and straight individuals and families who share common values. Passionate, provocative, and deeply Jewish, CBST champions a Judaism that rejoices in diversity, denounces social injustice wherever it exists, and strives for human rights for all people.

CBST is a community of immigrants and refugees and descendants of immigrants and refugees. We see those being targeted as part of our community and our neighbors, not our enemies. We are reminded of the words from the book of Leviticus that command us to welcome the stranger because we, too, were once strangers in a strange land. As LGBTQ people and Jews, we know the dangers of demonization, and we embrace resistance and love as our response. We cannot be silent. CBST stands committed to furthering social justice and equality for all people. We work within the congregation, take public action and lend our names and voices to a variety of social and humanitarian causes.

After the 2016 presidential election, CBST made a commitment to amplify its social justice initiatives and as part of that promise, we joined the New Sanctuary Coalition of New York City. We are partnering with them on education, training and support for the immigrant community in the tri-state area. CBST members regularly support immigrants facing ICE hearings and check-ins by attending meetings with DHS officials. We are committed to fighting for justice and for the humane treatment of all people.

**23. Congregation Beth Elohim (Brooklyn, NY)**

Congregation Beth Elohim is the largest Reform congregation in Brooklyn and a welcoming and inclusive synagogue, proudly rooted in Jewish history and identity, profoundly open to different backgrounds and divergent points of view. Our membership has a long tradition of engaging in tikkun olam (repairing the world) and see the termination of the DACA program as a grave threat to our moral obligation to always remember that we too were once “strangers in a strange land.”

**24. Congregation Shaarei Shamayim (Madison, Wisconsin)**

Congregation Shaarei Shamayim is a synagogue located in Madison, Wisconsin. Last January we initiated the Madison Jewish Pledge of Sanctuary and Solidarity, a statement that expresses our commitment to stand with our Muslim and Latino neighbors and to not remain silent when their safety is in jeopardy. We work closely with Voces de la Frontera, Wisconsin’s leading immigrant rights organization, and stand in solidarity with the Muslim and Latino communities of Madison. We have declared ourselves to be a sanctuary congregation and are ready to open our doors to provide shelter to an undocumented immigrant facing deportation. Out of these commitments we object to the termination of the DACA program.

**25. Council of Churches of the City of New York**

The Council of Churches of the City of New York was organized in 1895 and serves through the Christian denominations having ministry in the five boroughs of New York City. Its Board of Directors is composed of the bishops and chief executives of the member denominational judicatories which, collectively, are related to thousands of Christian congregations in the City. The Council, like its member denominations and affiliated congregations, are vitally concerned for the well-being of all persons created by God and residing in God’s Household, the inhabited earth. In particular, we are concerned for the protection and legal status of immigrants, especially those who arrived in this nation as children without documentation.

**26. Council on American-Islamic Relations – California Chapter**

The Council on American-Islamic Relations, California (CAIR-CA), is a chapter of the nation’s largest American Muslim civil rights and advocacy organization. CAIR-CA’s mission is to enhance the understanding of Islam,



encourage dialogue, protect civil liberties, empower American Muslims, and build coalitions that promote justice and mutual understanding. Through its four offices, CAIR-CA serves California's estimated one million American Muslims by providing direct legal services to victims of discrimination, working with the media, facilitating community education, and engaging in policy advocacy to advance civil rights and civic engagement. CAIR-CA also has dedicated Immigrants' Rights Centers in each local office working to empower, and protect the rights of, non-citizens.

CAIR-CA is dedicated to providing services to individuals whose immigration status will be impacted by the repeal of DACA. CAIR-CA has established Immigrants' Rights Centers at each of its four offices. Through these Centers CAIR-CA seeks to empower non-citizens by helping them achieve independence, security, and the opportunity to fully participate in American society. CAIR-CA takes a holistic approach, and serves the non-citizen community through engaging with and educating the community on immigration issues, providing legal services and representation, building coalitions among other organizations, and championing advocacy to improve governmental policies and practices.

## **27. Council on American-Islamic Relations – Michigan Chapter**

CAIR-MI's mission is to enhance the understanding of Islam, encourage dialogue, protect civil liberties, empower American Muslims and build coalitions that promote justice and mutual understanding through education, mediation, media and the law. CAIR-MI has been serving the entire state of Michigan since 2000 with an emphasis on Metro Detroit, Flint/Saginaw, Ann Arbor/Jackson, Lansing, Kalamazoo/Battle Creek, and Grand Rapids/Muskegon.

In addition to legal services CAIR-MI Safe Spaces program aims to proactively produce and implement legal policies and best practices with a variety of institutions to prevent incidents of bias and discrimination before they occur. Through the Safe Spaces Program, CAIR-MI has successfully drafted and implemented legal policies and best practices at a variety of institutions including law enforcement, universities, schools, correctional facilities, government agencies and several corporations throughout Michigan. Our Safe Spaces program also engages in youth outreach and engagement and anti-bullying programs.

CAIR-MI opposes the DACA termination memo based on its intent to deport individuals who have spent the majority of their lives in the US many of whom know no other home. These individuals directly benefit our programs by

engaging in outreach and providing diverse voices in various programs and internships with our legal and safe spaces programs. The loss of the individual and collective voices, ideas and actions provided by DACA recipients would result in harm to our mission and programming.

## **28. Council on American-Islamic Relations – New Jersey Chapter**

The Council on American-Islamic Relations (CAIR) is the largest Islamic civil liberties and advocacy group in the United States. Its mission is to enhance the understanding of Islam, encourage dialogue, protect civil liberties, empower American Muslims, and build coalitions that promote justice and mutual understanding. The demand for our services has grown tremendously. From restrictions placed on Muslims to practice their religion, to profiling and discrimination stemming from a lack of understanding of Islam, CAIR-NJ aims to provide that relief to the Muslim population in New Jersey. Protecting the rights of New Jersey's Muslims is at the core of CAIR-NJ's mission. CAIR-NJ also provides know your rights workshops for our constituents to teach them about their fundamental rights guaranteed to them under the Constitution. We work vigorously to educate on behalf of community members experiencing discrimination and remedy cases through in-person negotiations, from filing charges of discrimination, letter writing, and actively litigating in court. Cases range from employment, public accommodation and school discrimination, to hate crimes and governmental religious/racial profiling. CAIR-NJ's civil rights department counsels, mediates and advocates on behalf of Muslims and others who have experienced religious discrimination, defamation or hate crimes. The department works to protect and defend the constitutional rights of American Muslims, thereby supporting the rights of all Americans.

CAIR-NJ opposes the DACA termination memo based on its intended mission of potentially deporting 800,000 young undocumented individuals who have spent their entire lives in the United States.

## **29. Council on American-Islamic Relations – New York Chapter**

The Council on American-Islamic Relations, New York Inc. (“CAIR-NY”) is a leading Muslim civil rights organization, defending, representing, and educating nearly one million Muslims in the New York area. CAIR-NY's mission is to protect civil liberties, empower American Muslims, and build coalitions that promote justice and mutual understanding. Through legal representation, education, media relations, and advocacy, CAIR–NY empowers the American Muslim community and encourages their participation in political and social

activism. CAIR–NY counsels, mediates, and advocates on behalf of Muslims and others who have experienced discrimination, harassment, or hate crimes. Our lawyers work to protect and defend the constitutional rights of American Muslims, thus supporting the rights of all Americans.

### **30. Council on American-Islamic Relations – Oklahoma Chapter**

CAIR-Oklahoma is a nonprofit 501(c)(3) grassroots civil rights and advocacy group. Established in 2006 by a group of local Muslims, CAIR-Oklahoma serves the entire state of Oklahoma through its Oklahoma City office. Through legal representation, community education and outreach, government and legislative advocacy, and youth leadership programs, CAIR-Oklahoma works to empower the state’s Muslim community and improve relationships between Oklahoma’s many diverse faith and social justice communities. CAIR-Oklahoma is a chapter of the Council on American-Islamic Relations (CAIR), America’s largest Islamic civil liberties group with chapters nationwide. The national headquarters is located on Capitol Hill in Washington D.C. CAIR-OK’s mission is to enhance the understanding of Islam, encourage dialogue, protect civil liberties, empower American Muslims, and build coalitions that promote justice and mutual understanding.

CAIR-Oklahoma opposes the DACA termination memo because of its stated intent to deport the 800,000 young undocumented individuals who have spent their lives in the United States, dedicating their lives to education and work that improves the United States’ ability to compete on a global market. These young people benefit their communities by enhancing the diversity of the spaces in which they live, work, and go to school, their loss would harm the mission and programming of CAIR-Oklahoma by inhibiting our stated purpose of defending rights and defeating intolerance.

### **31. Cuba Presbyterian Church (Presbyterian Church, USA), Cuba, New Mexico**

Cuba Presbyterian Church (Presbyterian Church, USA), Cuba, NM is a small, traditional congregation in a northern New Mexico village. It was established in 1889 in a multi-cultural community made up of Spanish and Mexican settlers among the diverse Native American tribal communities – Navajo, Jicarilla Apache, and the nineteen Pueblos; along with the Anglo American presence which came into the area in the 1870s. We are keenly aware that we are all immigrants, and feel called to assure others the opportunities our families have had. Our mission as a church is to spread God’s loving message to all regardless

of race or national origin. Ending the DACA program has spread fear among some in the area, which overshadows and impairs the Christian message we are living in this community.

### **32. Daughters of Charity of St. Vincent de Paul**

The Daughters of Charity of Saint Vincent de Paul are an international community of about 14,500 Catholic sisters who devote our lives to serving the poorest and most abandoned individuals in today's society. The Daughters of Charity, USA, many of whom are immigrants themselves, serve in 27 U.S. states, Washington, D.C. and Canada. For more than 200 years, the Daughters of Charity, have embraced the gospel mandate to welcome the stranger by providing a host of direct services that includes legal advocacy, healthcare, education and other social work to the U.S. immigrant population.

Termination of the Deferred Action for Childhood Arrivals (DACA) program is an immoral act that violates our Catholic call to welcome the stranger and diminishes our ability to carry out our mission of service to those on the margins of society. The Daughters of Charity have befriended Dreamers and their families. They teach in our Catholic schools. They nurse in in our Catholic hospitals. They provide social services to our neighbors. Simply put, their presence creates stronger, healthier communities.

Pope Francis has instructed us, we “cannot remain silent in the face of the suffering of millions of people whose dignity is wounded, nor can we continue to move forward as if the spread of poverty and injustice has no cause.” If the termination of the DACA program is upheld, we know this injustice will result in the destruction of the family unit, the diminishment of community safety and the degeneration of our national honor. The Daughters of Charity will not remain silent in the face of this injustice that threatens Dreamers with merciless exclusion.

### **33. Degrees of Change**

Degrees of Change is a faith-based organization located in Tacoma, Washington that helps communities and colleges equip students to learn together through college and lead together back home. Degrees of Change partners with six Christian community-based organizations and twelve Christian colleges, serving more than 700 students across five states (WA, OR, MN, IL and IN). The curriculum that our community partners deliver to students integrates Christian perspectives and teaching on leadership, diversity and community development. The Executive Order to end DACA has led more than 60 of our scholars and

alumni to question their worth and their safety in this country. Deportation has ripped apart several of our scholars' families. Our college partners are struggling to provide financial aid to these scholars, and several scholars have dropped out of college because they can no longer afford it. Degrees of Change has made efforts to support immigrants facing deportation through our public messaging and national conversations with our scholars and community partners.

#### **34. DMV Sanctuary Congregation Network**

DMV Sanctuary Congregation Network (the network) is a network of 70 congregations of 17 religious traditions from DC, Maryland, and Northern Virginia. The network works and provides support to immigrant community in the DMV area and works with local allies to advance sanctuary policies. Our congregations have DACA-holders congregants who will be impacted by the ending of DACA. In the face of hate and discrimination we are committed to showing love, compassion and hospitality.

#### **35. Dominican Development Center**

Dominican Development Center is a non-profit organization affiliated with Saint Lourdes Church/Second Community in Boston, Massachusetts. We seek to develop and empower Dominican immigrants and immigrants representing all Latin American and Caribbean communities to take full participation on the civic life of this society. We strive to improve the quality of life of our members by promoting and organizing around issues that might impact our community, including but not limited to current laws, legal procedure, civic engagement, education, immigration reform, and human rights among others. The decision to end DACA would impact individuals and families who reside in our parishes and broader communities. Ending residency for those currently protected by the DREAM Act would move our country further away from the principles of justice that we see as people of faith. We add our voice to those asking the court to protect DREAMERS by not allowing the termination order to go into effect.

#### **36. East End Temple (New York City)**

East End Temple is a Reform Jewish congregation located in lower Manhattan in New York City that is dedicated to issues regarding immigration and immigrants' rights. With members of the congregation who are immigrants themselves or are descendants of recent immigrants, the congregation is particularly committed to the principle and commandment to welcome the stranger.

### **37. El Paso Monthly Meeting of the Religious Society of Friends**

The El Paso (Texas) Monthly Meeting of the Religious Society of Friends (Quakers) is a forty-year old organization but the roots of Quakers go back to seventeenth-century England. Friends strive to practice the ways of simplicity, peace, integrity, community and equality. Included in those values is our support for family-based immigration, the diversity visa, and strengthening access to asylum. Because we live in a border community, these issues are part of our lives each day. We also oppose the expansion of harmful or unchecked border enforcement and the elimination of avenues of legal immigration.

### **38. Emgage**

Emgage Foundation is one of the nation's largest civic education and mobilization organizations for Muslim American voters. We provide learning opportunities and events, including direct engagement with lawmakers, to increase the civic engagement of Muslim Americans and advance values that are important to us as Americans and as Muslims. One of our core programs is Get Out The Vote in five electorally important states, including Florida, Virginia, Pennsylvania, Texas, and Michigan. Our issue advocacy focuses on combating Islamophobia and hate crimes, social justice reform, improving our healthcare system, protecting immigrant and refugee communities, and advancing human rights globally.

### **39. Episcopal City Mission**

Episcopal City Mission (ECM) fights for racial, economic and immigrant justice through building relationships of shared power with faith rooted communities, grass-roots organizations and community organizing movements in Massachusetts. Our Episcopal/Anglican lens invites us to see all life as sacred and worthy of dignity and justice. This understanding guides us as we face into the dynamics of power and enable access and liberation for all communities. As the termination of DACA would deny access to those who are protected under the DREAM act we ardently ask that the court would not allow the termination order to go into effect

### **40. Episcopal Diocese of Massachusetts**

### **41. Episcopal Diocese of Western Massachusetts**

The Episcopal Dioceses of Massachusetts and the Diocese of Western Massachusetts serve 235 parishes across the state of Massachusetts. We seek to be Christ's presence of mercy, compassion, and hope in the communities we serve.

The decision to end DACA would impact individuals and families who reside in our parishes and broader communities. Ending residency for those currently protected by the DREAM Act would move our country further away from the principles of justice that bind us together. We add our voice to those asking the court to protect our brother and sister DREAMERS by not allowing the termination order to go into effect.

#### **42. Episcopal Diocese of New York**

The Episcopal Diocese of New York includes 199 local congregations (parishes) with about 66,000 members, 72 deacons, 600 priests and three bishops—including the diocesan bishop, currently the Rt. Rev. Andrew M.L. Dietsche, who is our chief pastor. To Episcopalians it seems pretty clear what Christians are supposed to do. Jesus said “Thou shalt love the Lord thy God with all thy heart, and with all thy soul, and with all thy mind. This is the first and great commandment. “And the second is like unto it, Thou shalt love thy neighbor as thyself. On these two commandments hang all the law and the prophets.” The first thing, then, after love of God—indeed the only thing—is to love our neighbors as ourselves. Not just some of them; not just the ones we feel comfortable with; not just the ones who have the same colored skin as us, or the same sexual preferences, or who don’t smell; but every single one of them. In fact as Episcopalians, we believe that no Christian life can be complete if the person living it does obey this command and act on it.

To end the Deferred Action for Childhood Arrivals would endanger the lives of thousands of young people and their families and run contrary to the faith and moral traditions of our country. It is unfair to threaten the well-being of young people who arrived in our country as children through no choice of their own. Ending DACA without a similar replacement program will force these young people to face the future in this country with little access to education and employment, and ultimately, could very well lead to sending them to countries where they did not grow up, have few support structures, may not even speak the language and may be vulnerable to violence and persecution. Any of these scenarios, we believe, is cruel.

#### **43. Episcopal Society of Christ Church/The Christ Church Cathedral, Cincinnati, Ohio**

The Episcopal Society of Christ Church is a congregation of the Episcopal Church and is the Cathedral for the Episcopal Diocese of Southern Ohio. For 200 years, the Cathedral has worked in the Cincinnati community to combat poverty

and has been involved, since its founding, in issues of social justice. The Cathedral carries out its missions through community grants, educational opportunities and direct mission work. For example, the Cathedral hosts “community forums” to educate the public on issues of social justice and also sponsors a 200 + person dinner every Tuesday for our friends who make their homes on the streets, offering not only food but also social services. Because of its tradition and continuing programs, the Cathedral is interested in helping those who face the prospect of deportation without just cause. The Cathedral is keenly aware of the perils faced by those who would be subject to such deportation, including the breakup of families, the impact on economic well-being and the dangers faced in home countries. For these reasons, the Cathedral has become involved in the sanctuary movement in Cincinnati.

#### **44. Faith Action Network**

Faith Action Network (FAN) is a statewide (Washington State) interfaith advocacy organization that educates, organizes, and mobilizes people of all faith traditions to take action on the critical social issues of our day. One of those very current social issues regards the Deferred Action for Childhood Arrivals (DACA) program of the federal government. FAN is deeply concerned about President Trump’s decision to terminate this important protection program for those who came to this country as children by their parent(s) or family member many years ago. It is morally reprehensible to think that these young people who know no other country than the USA will be deported by next March and sooner. We all know that deportation means imprisonment, separation from family, loss of employment and income, and will put their lives at risk as they are forcibly displaced to another country. FAN has advocated for those in this program (Dreamers) for many years at the state and congressional level to receive equal tuition/scholarship opportunities for college and other government benefits. The Dreamers – as they are known – love this country, contribute to our economy with their skills and talents, and have – and we hope will continue to make our nation better, stronger, and more equitable.

#### **45. First Congregational United Church of Christ (Albuquerque, New Mexico)**

We are strong supporters of DACA. Our mission is to live God’s love, justice, and inclusion and we believe that should be for all. We are currently offering sanctuary to a refugee at our church as a part of our faith commitment to



the principle that “God’s doors are open to all.” It is a privilege to walk with one together in this journey toward a just immigration system.

#### **46. First Presbyterian Church of Taos, New Mexico**

Our congregation’s call to love God and our neighbors extend to all members of the Taos community, regardless of immigration status. We know and love immigrants and DACA recipients in our community, and we know that our church and our community is enhanced by their presence. We believe that DACA is a humanitarian issue for our community and for all God’s people. Additionally, our denomination has consistently and historically expressed support for the values, safety, gifts, and perspectives of immigrants of all nations, and has called for the ongoing support and protection of all DACA recipients. We sign onto this Amicus Brief in the spirit of Leviticus 19, which calls us not to oppress immigrants but to love each immigrant as ourselves, and in the Spirit of Matthew 25, in which Jesus reminds his disciples that when we welcome a stranger, we welcome Jesus Christ himself.

#### **47. First Unitarian Congregational Society in Brooklyn**

As a member congregation in the Unitarian Universalist Association, the First Unitarian Congregational Society in Brooklyn (First U Brooklyn) is committed to: the inherent worth and dignity of every person; justice, equity and compassion in human relations; and the goal of a world community with peace, liberty and justice and for all. Consistent with these principles, First U Brooklyn has declared ourselves a sanctuary congregation, invoking the millennia-old tradition of a house of worship offering a safe space and time for individuals in need. First U Brooklyn specifically offers safe space and time for immigrants and refugees to examine their options and make the soundest decisions when faced with possible deportation.

But Dreamers protected by DACA should have no need for sanctuary. Our country has already recognized that it is just and appropriate to allow these young men and women, who came to this country at an early age and in good conscience, to make a life for themselves in the United States, just as so many of our ancestors did. Terminating DACA now would unconscionably disrupt and threaten their lives and those of their families and loved ones. The righteous path is for our country to maintain the commitments we have made to these young people under DACA. While First U Brooklyn is proud to offer sanctuary to those in need, Dreamers should continue to be protected under DACA, and have no need of sanctuary.

**48. First United Presbyterian Church of Las Vegas, New Mexico**

Our inclusive congregation is a member of the Presbytery of Santa Fe and the Presbyterian Church (USA). This denomination has historically supported the valuable gifts and perspectives of immigrants. The church has called for support of DACA recipients. Our church community stands for justice and, from that standpoint, we wish to protect the rights of all people—especially those most vulnerable. For this reason, we express our support of the Amicus Brief.

**49. Franciscan Friars of the Province of St. Barbara**

The Franciscan Friars of the Province of St. Barbara, part of what is formally known as the Order of Friars Minor (OFM), are members of a Roman Catholic religious order of men. From a diversity of backgrounds and cultures, they are dedicated to serving the poor and promoting justice, peace, care of creation, and reconciliation. They do this in the joyful and prophetic spirit of St. Francis of Assisi.

The members of the Province of St. Barbara live and work in California, Arizona, Oregon, and Washington, serving communities whose profiles cross ethnic, cultural and economic boundaries. Friars also serve in a number of Native American nations in the Southwest, as well on mission to Mexico, Russia, and the Holy Land. The friars uphold the dignity and rights of immigrants through ministry in parishes, retreat centers, advocacy actions, and social outreach programs.

The friars of the St. Barbara Province are convinced that the present federal climate of oppressing immigrants is contrary to human dignity afforded every child of God. Like Pope Francis has stated, “A person who thinks only about building walls, wherever they may be, and not building bridges, is not Christian. This is not the Gospel.” And last year, the Pope added, “Walls solve nothing. We must build bridges. But bridges are built intelligently, through dialogue and integration. So I understand this fear, but closing borders does not solve anything, because in the long term that closure hurts the people themselves.” And as well, the underlying racism needs to be labeled, and nonviolently opposed.

**50. Global Justice Institute**

The Global Justice Institute serves as the social justice arm of Metropolitan Community Churches, and works with LGBTQI activists and allies around the world to support projects for social change. One of our programs, ASAP (Asylum Seekers Assistance Program) has enabled LGBTQI people fleeing persecution to

resettle in safer environments. We have consistently lobbied on behalf of DACA and those it supports.

**51. Hawaii Conference of the United Church of Christ**

The Hawaii Conference of the United Church of Christ is an organization of 130 member churches on six islands in the Hawaiian archipelago that traces its beginnings back to immigrants who were first welcomed by the Hawaiian people in 1820. We are committed to a world of Aloha, justice, and peace for all. On Saturday, February 3, at the Board of Directors of the Hawai'i Conference United Church of Christ quarterly meeting in Honolulu, Hawaii, we voted enthusiastically to sign on to the DACA Amicus Brief on Behalf of Religious Organizations.

**52. Hispanic Apostolate of the Catholic Diocese of Baton Rouge**

The Hispanic Apostolate of the Catholic Diocese of Baton Rouge is an organization whose mission is to promote the integration of our Hispanic brothers and sisters into the life of the Catholic Diocese of Baton Rouge. In keeping with that mission, we believe that the termination of DACA without an adequate replacement would be a senseless injustice and enthusiastically endorse the Religious Organizations amicus brief.

**53. Hispanic Connection of Southern Indiana**

Our mission is to assist all immigrant people that are underserved. By signing on to the Amicus Brief, we are exercising our belief that justice and peace are served when the rights of all people are protected.

**54. Hyattsville Mennonite Church**

Part of Mennonite Church USA, Hyattsville (MD) Mennonite Church is a congregation of 250 children and adults committed to making Mennonite Christian traditions and beliefs relevant in the cultural setting of the Washington, D.C., metropolitan area. We are a welcoming congregation strongly committed to peace, justice, hospitality and beauty. Our Sanctuary Committee works closely with Sanctuary DMV (District, Maryland, Virginia), San Mateo Episcopal Church (in Hyattsville), PICO and CASA of Maryland to advocate for and support our immigrant neighbors and friends, with and without status.

**55. Interfaith Alliance of Iowa**

Interfaith Alliance of Iowa is a progressive voice for people of faith and no religious affiliation in Iowa protecting religious freedom, ensuring religion is not misused to discriminate, championing individual rights, and uniting diverse voices to challenge extremism. We educate and advocate on many issues of social justice, but always leading through a lens of civility.

DACA is important to the fabric of our state because it has allowed Iowans – Dreamers - to come out of the shadows, live without fear, and contribute more fully to the communities in which they live. Dreamers only want to work, go to school, and be family in a secure community. They want to worship in safety. They want their children to get an education. They want to be good neighbors. As an organization, we believe in the American Dream and we believe that ensuring Dreamers can participate in our communities not only helps them but helps the communities in which they live.

**56. Iowa Conference of the United Church of Christ**

The Iowa Conference of the United Church of Christ is a regional association of 168 UCC congregations. In supporting this brief we are represented by our staff and Board of Directors. Our rationale for this support is theological and practical: Hospitality and welcome for neighbors – both long-time and newly arrived – is fundamental to our values and our identity. Our congregations were mostly formed 140 to 175 years ago – many by immigrants. We are convinced that the fabric of our communities is stronger today for the inclusion of those who came here as “outsiders” over a century ago; similarly we believe that our communities will be strengthened by the inclusion of immigrants newly in our midst, and are consequently strongly supportive of DACA.

**57. Islamic Circle of North America****58. ICNA Council for Social Justice**

Established on September 1st, 1968, the Islamic Circle of North America was a response to the growing need for a supportive Muslim community in North America. In the past decade, ICNA has expanded its reach across the US while maintaining an active presence in local communities. The ICNA Council for Social Justice, a branch of ICNA dedicated to representing the Muslim voice on matters of social justice was formed in 2009. In keeping with our goal of representing the Muslim voice on matters of social justice, we believe that the termination of DACA without an adequate replacement would undermine American communities

and would cause great harm. We have therefore decided to join the Religious Organizations amicus brief.

### **59. Islamic Society of Basking Ridge**

The Islamic Society of Basking Ridge is dedicated to providing Islamic religious, educational, cultural and social services to Muslims living or working in Somerset Hills, New Jersey, and the surrounding areas; providing these services in an open, diverse, inclusive and moderate environment, consistent with the Qur'an and Sunnah; and promoting interfaith and intra-faith dialogue in order to improve relations between Muslims and people of other faiths. We strongly believe as part of our religious outreach that our laws must be applied fairly and justly to all communities. We feel that the children and young adults eligible for DACA and currently receiving its benefits are entitled to the equal protection of the law.

### **60. Islamic Society of Central Jersey**

The ISCJ is an organization of Muslim Americans that was formed in 1975 that provides religious, educational and social services to its members, as well as to the community at large. The ISCJ established a place of worship in South Brunswick, NJ in the early 1980s. The ISCJ aspires to be the anchor of a model community of practicing Muslims of diverse backgrounds, democratically governed, efficiently served, relating to one another with inclusiveness and tolerance, and interacting with neighbors and the community at large in an Islamic exemplary fashion.

The ISCJ is very concerned about the issues raised in this matter as it believes that the arbitrary rescission of DACA will certainly harm our diverse congregation and community by forcing members of organizations to leave the country or to live in fear. This action is contrary to the ISCJ's moral, spiritual and religious beliefs and practices.

### **61. Lab/Shul**

Lab/Shul is an everybody friendly, artist-driven, God-optional, experimental community for sacred Jewish gatherings based in NYC and reaching the world. The Lab/Shul community is dedicated to exploring, creating and celebrating innovative opportunities for contemplation, life cycle rituals, the arts, life-long learning and social justice. We oppose the termination of the DACA program for three reasons:

1. Terminating DACA would prevent us from fully fulfilling our mission as a spiritual community that is “everybody friendly,” including to immigrants and specifically DACA recipients.
2. Many of us are friends with or have worked with DACA recipients and we know them to be upstanding members of society that add to the cultural and economic fabric of the United States.
3. Most of our community identifies as Jewish. It is commonly known that Jewish-American narratives are often stories of seeking refuge from tyranny in the freedom of the United States. Just as the lives of our ancestors were at stake, the very lives of many of these DACA recipients are at stake. Some of our ancestors arrived here documented, and some arrived undocumented, some were turned away - and later murdered during the Holocaust. Experience and the Torah teach us that the United States can and should welcome those who immigrate here because we were “once strangers in the land of Egypt” - that is, because we are also immigrants.

## **62. Leadership Conference of Women Religious**

The Leadership Conference of Women Religious (LCWR) is an association of leaders of congregations of Catholic women religious in the U.S. founded in 1956. LCWR has nearly 1300 members, who represent approximately 38,800 women religious in the U.S. The conference promotes a developing understanding religious life by assisting its members to carry out more collaboratively their service of leadership in order to accomplish further the mission of Christ in today's world; fostering dialogue and collaboration among religious congregations within the church and in the larger society; developing models for initiating and strengthening relationships with groups concerned with the needs of society, thereby maximizing the potential of the conference for effecting change.

LCWR members are committed to the gospel mandate to welcome the stranger. Catholic sisters have a long history of accompanying the immigrant community and they continue to minister to these aspiring citizens in schools, hospitals, and service agencies across the country. They know first-hand the fear and uncertainty that plagues Dreamers and their communities. They will continue to stand with immigrant youth and their families and will be staunch advocates for a solution that protects Dreamers, provides them a path to citizenship, recognizes

the sanctity of families, and balances the need of nations to control their borders with the right of vulnerable migrants to access protection.

**63. Legal Advocacy Project of Unitarian Universalist FaithAction of New Jersey**

The Legal Advocacy Project of Unitarian Universalist FaithAction of New Jersey (“UU FaithAction NJ”) is a New Jersey not-for-profit membership organization representing most of the Unitarian Universalist congregations of New Jersey. Founded in 2009, UU FaithAction NJ gives voice to Unitarian Universalist humanitarian values in matters of public policy and justice advocacy in New Jersey. Rooted in 250 years of free church tradition, Unitarian Universalists share a belief in right action, as opposed to right doctrine, as the basis of their core humanitarian values. Its shared Principles and Purposes include a commitment to the inherent worth and dignity of every person; to justice, equity and compassion in human relations; and to the right of conscience and the use of the democratic process within its congregations and in society at large.

**64. Living Interfaith Church of Lynnwood, WA**

The Living Interfaith church was founded upon the principles of love, compassion, and community, and a respect for the diversity that is our human family. One of our founding fundamental assumptions is that “We are defined by how we act and whom we help. We are called to act with compassion, love and respect not only within our community but within the entirety of the human community.” We are thus called to act with compassion, love and respect for the nearly 1 million “Dreamers” who have lived in our country most of their lives, and who deserve both the legal and emotional security of having their rights recognized. Justice and our hearts demand that we support DACA. We feel honored to be included among those supporting this crucial brief.

**65. Lutheran Social Services of New York (LSSNY)**

Lutheran Social Services of New York (LSSNY) has provided comprehensive social service programs to children and families for more than 130 years. LSSNY serves families in need across the New York metropolitan area and Long Island, offering a variety of programs, including foster care, family treatment rehabilitation, early childhood education and special education, immigration legal services, shelter and supportive services to unaccompanied minors, supportive housing and hunger prevention. LSSNY began in 1886 when 11 Lutheran congregations in the New York metropolitan area created an orphanage for

children affected by a severe outbreak of influenza within the German communities of New York City. The agency was among a group of Lutheran mission societies that served Lutherans who had immigrated to New York. Over the years, LSSNY formed alliances with other Lutheran organizations and church bodies, and in the years since 1990 has expanded its programming to include community services (immigration legal, refugee services, hunger prevention), supportive housing for formerly homeless individuals, and education services. Throughout this expansion, LSSNY's mission has remained the same: "Called by God, we encourage people to reach their full potential." LSSNY works with local community partners to understand the needs of our neighbors, and to bridge the gap between what any one individual can accomplish on their own, and what they can achieve with the supportive care of our services. LSSNY employs some 650 employees who work as counselors, teachers, caregivers and legal counsel, to strengthen the lives of those we serve.

#### **66. Maryknoll Office for Global Concerns**

Maryknoll Office for Global Concerns is the justice and peace advocacy office representing Maryknoll Missioners – Catholic priests, brothers, sisters and lay missioners- who work with the poor and marginalized in 40 countries around the world. From their headquarters in Ossining, NY, Maryknoll Missioners have lived and worked with families in extreme poverty for many years in countries where DACA recipients originate. Maryknoll Fathers and Brothers, Sisters, and Lay Missioners have acquired a deep understanding of the dire social, economic and environmental conditions that Dreamers would face if they were deported, as well as intimate witness to the fragility and insecurity of living in the shadows without documents in the US. Deporting Dreamers to their countries of origin, where most have only weak or distant ties, would subject them to the same forces of poverty, violence, and instability their families originally fled and from which millions more still flee. For these reasons we oppose the termination of DACA and seek a resolution of Dreamers' status that allows them a path to citizenship.

#### **67. Metropolitan New York Synod of the Evangelical Lutheran Church in America**

The Metropolitan New York Synod is the regional expression of the Evangelical Lutheran Church in America, a member church of the Lutheran World Federation—A Communion of Churches. Lutherans are a diverse group of people, convinced that the Holy Spirit is leading us toward unity in the household of God. As Lutherans, we are worshipping God, helping friends and neighbors, celebrating



diversity, feeding the hungry, working for justice, and advocating for peace. When we serve others and address social issues that affect the common good, we live out our Christian faith. There are nearly 200 congregations across New York City, Long Island, and in the counties of Westchester, Putnam, Orange, Rockland, Sullivan and Dutchess. The Rev. Dr. Robert Alan Rimbo serves as the Lutheran Bishop of the Metro New York area.

The Metropolitan New York Synod and, specifically, Bishop Robert Alan Rimbo, have been consistent supporters of Dreamers. The termination of the DACA program is, to say the least, troubling. These people whom some now wish to deport from the only homeland they know because of what can only be called the accidents of history and for no other reason – they just happened to be brought to our communities as their families searched for new hope – are model citizens. They are the kinds of people we want to have as neighbors: health care professionals, artists, teachers, friends, mechanics, the list seems endless, and now, for reasons beyond our grasp they are being threatened with deportation. We stand united against this and in support of DACA and the people it protects. We, as people of faith, are prompted to pray for godly wisdom to prevail among the powers that be in our country, itself built on the hopes and dreams of immigrants.

#### **68. Muslim Advocates**

Muslim Advocates is a national legal advocacy and educational organization that works on the front lines of civil rights to guarantee freedom and justice for Americans of all faiths. Muslim Advocates advances these objectives through litigation and other legal advocacy, policy engagement, and civic education. Muslim Advocates also serves as a legal resource for the American Muslim community, promoting the full and meaningful participation of Muslims in American public life. The issues at stake in this case directly relate to Muslim Advocates' work fighting for civil-rights protections for American Muslim communities, which includes immigrants and persons who have benefited from the Deferred Action for Childhood Arrivals Program.

#### **69. Muslim Bar Association of New York**

Muslim Bar Association of New York (“MuBANY”) is one of the nation’s largest and most active professional associations for Muslim lawyers. MuBANY provides a range of services for the legal community and for the larger Muslim community. One of MuBANY’s missions is to improve the position of the Muslim community at large which is comprised of significant number immigrants and, in particular DACA recipients. MuBANY seeks to support the Muslim community

and its significant immigrant contingent through community education, advancing and protecting the rights of Muslims in America, and creating an environment that helps guarantee the full, fair and equal representation of Muslims in American society.

#### **70. Muslim Public Affairs Council**

The Muslim Public Affairs Council (MPAC) is a community-based public affairs nonprofit working to promote and strengthen American pluralism by increasing understanding and improving policies that impact American Muslims. MPAC's vision is an America enriched by the vital contributions of American Muslims. MPAC participated as amicus curiae in cases concerning civil liberties (*Boumediene v. Bush* and *al-Odah v. U.S.* (U.S. 2007)); immigration (*Donald Trump v. IRAP* (U.S. 2017) and *Arizona v. U.S.* (U.S. 2012)); and religious liberties (*Masterpiece Cakeshop v. Colorado Civil Rights Commission* (U.S. 2017) and *Holt v. Arkansas Dept. of Correction* (U.S. 2014)).

#### **71. Muslim Urban Professionals (Muppies)**

Muslim Urban Professionals, (Muppies), is a nonprofit, charitable organization dedicated to empowering and advancing Muslim business professionals to be leaders in their careers and communities. Its mission is to create a global community of diverse individuals who will support, challenge, and inspire one another by providing a platform for networking, mentorship, and career development.

Muppies represents an engaged group of Muslim professionals that believe immigrants and refugees are an integral part of the U.S. economy, adding over \$1 trillion to the USA's GDP. Muslims contribute to the fabric of the US in diverse ways, such as driving innovation, creating new opportunities for employment, and promoting excellence through diversity and inclusion. We oppose any policy that results in a reduction of opportunity and inclusion for any individuals or groups.

#### **72. Muslims for Peace, Inc.**

Muslims for Peace, Inc. ("MFP") is a New Jersey based non-profit that aims to bridge people from different religious and ethnic backgrounds through interfaith activities, such as presentations, seminars and discussions. We also provide charitable support in the form of organizing food drives and organizing relief for disaster victims. Through our work, we aim to assist people of all faiths and ethnic backgrounds. We stress tolerance, education and humane solutions to problems

facing our communities. We support DACA as a just and proper response to a humanitarian issue that otherwise has and will continue to divide and disrupt families and communities.

### **73. Muslims for Progressive Values**

Muslims for Progressive Values is the oldest and only progressive and Muslim faith-based human rights organization in the U.S. founded in 2007. We embody and advocate for the traditional Quranic values of social justice, an understanding that informs our positions on women's rights, LGBT inclusion, freedom of expression and freedom of and from belief. As an organization that promotes diversity and inclusivity, we find the termination of DACA cruel to families and the antithesis to America's founding values.

### **74. National Council of Jewish Women**

The National Council of Jewish Women (NCJW) is a grassroots organization of 90,000 volunteers and advocates who turn progressive ideals into action. Inspired by Jewish values, NCJW strives for social justice by improving the quality of life for women, children, and families and by safeguarding individual rights and freedoms. NCJW's Resolutions state that NCJW resolves to work for "Comprehensive, humane, and equitable immigration, refugee, asylum, and naturalization laws, policies, and practices that facilitate and expedite legal status and a path to citizenship for more individuals." Consistent with our Principles and Resolutions, NCJW joins this brief.

### **75. NETWORK Lobby for Catholic Social Justice**

NETWORK Lobby for Catholic Social Justice is a national organization founded by Catholic Sisters in 1972. For 45 years we have worked at the intersection of faith and politics. Our staff and extensive national membership include Dreamers all of whom have been effective and enthusiastic in their engagement with faith in the quest for justice. If the administrative order is implemented our work in democratic education will be seriously impaired both in our central office in Washington, DC and around the nation.

### **76. New Jersey Interfaith Coalition**

New Jersey Interfaith Coalition is non-partisan network of houses of worship, organizations, and individuals with the following mission: Promote houses of worship, non-political organizations and individuals to work together to

honor and enrich diverse faiths and ethical practices. Oppose intolerance and hate. Foster a climate of positive mutual acceptance and appreciation for all, regardless of their faith, race, or sexual orientation. Our guiding principles are to promote the adoption of the “Stand Up for the Other” pledge, especially among our own communities; encourage interfaith dialogue and collaboration; respond to acts of intolerance, bigotry, terrorism, and hate; sponsor and participate in events consistent with our mission and promote each other’s events within our communities; and to promote other common actions consistent with our mission.

Our “Stand Up for the Other” pledge leads us to support DACA and oppose its termination just the same as we oppose bigotry, racism, anti-Semitism, and Islamophobia: “While interacting with members of my own faith, or ethnic, or gender community, or with others, if I hear hateful comments from anyone about members of any other community, I pledge to stand up for the other and speak up to challenge bigotry in any form.”

#### **77. New Mexico Conference of Churches**

The New Mexico Conference of Churches is a statewide network of churches working for the wellbeing of New Mexico’s peoples and environment. Our congregations welcome the gifts of all people in the name of Christ no matter their immigration status. Our member congregations, and the communities in which they serve, include DACA recipients and their families. We call for ongoing support and protection of DACA recipients.

By our baptism, we are united in Christ and called to care for the least of these (Matthew 25:40) and to love our neighbors as ourselves (Matthew 22:39). DACA recipients, immigrants, and refugees are our neighbors and we are compelled by our faith to seek and serve Christ in each person. We believe that justice and peace are served when the rights of all people—especially vulnerable young people, immigrants and refugees—are protected.

#### **78. New Mexico Faith Coalition for Immigrant Justice**

The New Mexico Faith Coalition for Immigrant Justice is a faith based group that was formed over eight years ago as a response to attacks on our immigrant communities during the last administration. Since its formation, the Coalition has been deeply committed to supporting the immigrant families in New Mexico through the hardships of deportation and detention and has been outspoken against unjust and inhumane immigration laws, advocating for laws that reflect the higher values of the dignity of the person, unity of the family, richness in diversity,

and the freedom of the pursuit of purpose. Among the many services we provide to the immigrant community are direct service: connecting families to legal and social resources, faith-based community education of immigrant issues, border awareness programs, micro-loans for immigration form submittals, court accompaniment for families, and refugee hospitality program: picking up and finding a place to stay for asylum seekers and asylees released from the Cibola detention center.

As a small organization with 3 part-time staff, two who are DACAmented, our efforts to work for immigrant justice and support the direct service needs of our migrant communities are inextricably tied to having a continuation of DACA or implementation of a Clean DREAM Act. While many of us who are allies have worked in this field for years or decades, it is only with the participation and leadership of the affected communities, particularly those who are undocumented or under threat of immigration enforcement, that we can strive to create better immigration laws and a more just system that supports the well-being of all.

#### **79. New Sanctuary Coalition**

The New Sanctuary Coalition is an interreligious grass roots organization in solidarity with families and communities who are striving to keep their loved ones together as we reimagine and implement ways to prevent and stop the detention and deportation of our loved ones.

#### **80. New Sanctuary CT**

New Sanctuary CT is a faith-based organization committed to providing safe space for undocumented friends facing deportation.

#### **81. New York Board of Rabbis**

The New York Board of Rabbis (“NYBR”) is the largest and oldest interdenominational rabbinic organization in the world, representing the different streams of Jewish life in America. Our members serve communities in the Greater New York area and around the country. Established in 1881, the NYBR is the primary address for rabbis serving congregations, organizations, chaplaincies, communal service agencies, and schools. The Board seeks to enhance and expand the role of the Rabbinate for the betterment of the Jewish people and the world at large by providing its members with a spiritual environment and opportunities to grow professionally, promoting religious pluralism, and building bridges across denominations with other faiths. We are a central convener of multi-faith

dialogues to promote increased understanding of one another and pursue avenues of common concern.

The Jewish community is an immigrant community spanning the history of America. From the first Jewish settlers who arrived in New Amsterdam in Lower Manhattan to the Jews who have come to this great nation in recent years. We believe that America is a great nation because of its diversity and its robust immigrant history. The NYBR proudly collaborates with legal and advocacy groups to support Dreamers and to keep our Nation's doors open to those who seek refuge on our shores. Recently we partnered with UNICEF USA to help Syrian refugees who are living in the United States. Our tradition teaches us to "welcome the stranger," created in the image of God and a respected member of the human family.

## **82. New York Conference United Church of Christ**

The New York Conference United Church of Christ consists of over 270 local churches and 30,000 members, encompassing the entirety of New York State. The Conference is one of thirty-eight regional bodies of the United Church of Christ. We are committed to being led by the Spirit to faithful witness, compassionate justice, and bold Christian leadership. Guided by this mission, the ministries of the New York Conference, in all its settings, respond to the Still Speaking God and the gospel call for peace and justice. Embracing the United Church of Christ's vision of "A Just World For All," we believe that the elimination of the Deferred Action for Childhood Arrivals Program is contrary to our faith, which affirms the dignity and worth of all people regardless of country of origin or extent of documentation. The gospel of Jesus Christ compels us to extend an extravagant welcome to all, so that all may experience a "more and better life than they ever dreamed of" (John 10:10 *The Message*). The New York Conference signs on to this brief in support of all the Dreamers who are not only members of our congregations but our neighbors and friends.

## **83. Northern California Nevada Conference of the United Church of Christ**

The Northern California Nevada Conference of the United Church of Christ (NCNCUCC) includes 117 churches in Northern California and Northern Nevada. NCNC prides itself on its work and participant in issue of justice. Justice in our Immigration process is one area of focus for many of our churches and for our Conference as a whole. A year ago we passed a resolution titled "A Call to Become Immigrant and Refugee Welcoming as a Conference and in Congregations." This resolution is based on the belief that every immigrant and

refugee has inherent dignity and human rights; that every immigrant and refugee should be able to live in safety, to live without fear, and have access to basic necessities and opportunities. Our churches live this out through works of direct service, worship, and advocacy. The repeal of DACA would mean the government would stand between us and those we are called to serve. It would make it much more difficult, and in some cases impossible, for us to fulfill the mission we've discerned God is calling us to.

#### **84. Oregon Interfaith Movement for Immigrant Justice**

The Oregon Interfaith Movement for Immigrant Justice (IMIrJ) is an organization made up individuals, faith leaders and diverse faith communities called by our conscience to respond actively and publicly to the suffering of our immigrant brothers and sisters in the U.S. Through advocacy, accompaniment, and faith community organizing, we expose the injustices current immigration policies and practice inflict on the entire community, as we take radical action for the transformation of power to enact policies of welcome and respect. We see the termination of DACA as a complete betrayal of the trust that immigrant families place in this country, as these families seek refuge, safety, and a dignified life free from oppression and violence. The reality of U.S. policies that separate families and imprison individuals for deportation is a type of profound harm that cannot be ignored—and will be difficult to “undo”—with long term repercussions on the lives of immigrants and on the moral fabric of this country. Our traditions of faith compel and inspire us to add our voice of support to this amicus brief. We pledge our unwavering commitment to opening doors of welcome, love, and sanctuary to immigrants and refugees.

#### **85. Pacific Northwest Conference of the United Church of Christ**

The Pacific Northwest Conference of the United Church of Christ (PNCUCC) is an organization of approximately 80 churches in Washington State, North Idaho and Alaska. Our Constitution and Bylaws open with this scriptural guidance; “The Lord has told us what is good. What God requires of us is this: to do what is just, to show constant love, and to live in humble fellowship with our God.” Out of this call from God, PNCUCC recently passed a resolution titled “A Call to Become Immigrant and Refugee Welcoming as a Conference and in Congregations.” This resolution is based on the belief that every immigrant and refugee has inherent dignity and human rights; that every immigrant and refugee should be able to live in safety, to live without fear, and have access to basic necessities and opportunities. Our churches live this out through works of direct

service, worship, and advocacy. The repeal of DACA would mean the government would stand between us and those we are called to serve. It would make it much more difficult, and in some cases impossible, for us to fulfill the mission we've discerned God is calling us to.

#### **86. Presbyterian Church (U.S.A.)**

Reverend J. Herbert Nelson, II, Stated Clerk of the General Assembly of the Presbyterian Church (U.S.A.) ("PCUSA") joins this brief as the senior ecclesiastical officer of the PCUSA. The PCUSA is a national Christian denomination with nearly 1.6 million members in over 9500 congregations, organized into 170 presbyteries under the jurisdiction of 16 synods.

Through its antecedent religious bodies, it has existed as an organized religious denomination within the current boundaries of the United States since 1706. This brief is consistent with one hundred and twenty-five years of policies adopted by the General Assembly of the Presbyterian Church (U.S.A.) wherein we have pressed our government for better treatment of immigrants and refugees. For the past decade this denomination has supported and encouraged its congregations to provide pastoral care to and advocacy for and with young people brought to this country as children without documentation. Many of our members and rising church leaders will be directly harmed if the government ends deferred action for childhood arrivals. As a denomination that supports and engages in the Sanctuary Movement many of our congregations will choose to offer sanctuary rather than allow our members to be deported to countries they have never known. The General Assembly does not claim to speak for all Presbyterians, nor are its policies binding on the membership of the Presbyterian Church. However, the General Assembly is the highest legislative and interpretive body for the denomination, and it is the final point of decision in all disputes. As such, its statements are considered worthy of the respect and prayerful consideration of all the denomination's members.

#### **87. Presbytery of the Pacific**

The Presbytery of the Pacific is the governing body of the Presbyterian Church (USA) in Los Angeles, California. We partner with churches, communities and the city of LA and are a leader in faith-based immigration initiatives throughout the city and county of Los Angeles.



## **88. Presentation Sisters at Caminando Juntos**

Caminando Juntos, sponsored by the Aberdeen Presentation Sisters, is a ministry with the Latino population in the Sioux Falls, South Dakota area. Inspired by the zeal of our foundress, The Venerable Nano Nagle, and her deep love for those made poor, Caminando Juntos responds to the Gospel mandate to “welcome the stranger.” Our primary purpose is to help create a welcoming presence and respond to the needs of newer Latino immigrants as they seek to integrate into a new culture and make a home among us. In keeping with that purpose and the spirit of The Venerable Nano Nagle, we believe that the termination of DACA without an adequate replacement would be a grave injustice and for this reason, we join the Religious Organizations amicus brief.

## **89. Province of St. Mary of the Capuchin Order**

In the Northeast United States, the Capuchin Franciscan friars of the Province of St. Mary are dedicated to the service of real human needs and the proclamation of God’s love. The vision of St. Francis of Assisi inspires our life and ministry. We serve immigrants from a variety of cultures and nations in urban, suburban, and rural settings. We are troubled by the Government’s proposed rescission of Deferred Action for Childhood Arrivals because it is driving away from our churches and institutions the youth most in need of love and care. Furthermore, the proposed termination of DACA has already harmed our religious organization because it has hindered young men with a calling to ministry as a friar from joining our community. Indeed, all religious organizations are being hobbled through their inability to recruit and train the next generation of spiritual leaders and servants. This is causing injury to the welfare of our communities. The termination decision is contrary to the Gospel of Christ at the foundation of our life and work. We join this amicus brief moved by the needs of the Dreamers and the demands of justice.

## **90. Queens Federation of Churches**

The Queens Federation of Churches was organized in 1931 and is an ecumenical association of Christian churches located in the Borough of Queens, City of New York. It is governed by a Board of Directors composed of equal number of clergy and lay members elected by the delegates of member congregations at an annual assembly meeting. Over 390 local churches representing every major Christian denomination and many independent congregations participate in the Federation’s ministry. Our ecumenical ministry in the nation’s most diverse county finds many congregations ministering to

immigrants. Our concern to protect their God-given right to be in our part of the global household of God is paramount. Therefore, especially, we strongly support legal status for those who came to this country as children.

### **91. Religious Institute**

Founded in 2001, the Religious Institute is a multi-faith organization dedicated to advocating for sexual, gender, and reproductive health, education, and justice in faith communities and society. With a network of more than 8,500 religious leaders and people of faith, the Religious Institute has a record of creating campaigns that mobilize thousands of religious leaders and hundreds of faith communities. The Religious Institute also has long-standing partnerships with graduate theological schools, denominations, religious organizations, and sexual, gender, and reproductive justice organizations. In all our work, we offer prophetic, moral leadership at the intersection of religion and sexuality, gender, and reproductive health. As part of that prophetic leadership, we oppose the termination of the DACA program. We hold that all people should be able to live and create families with dignity and respect, free from fear and state-based violence. The sacred worth of all people is inherent and in no way dependent on performance, productivity, or so-called 'economic value.'

### **92. Romemu**

Romemu is a Jewish community that seeks to integrate body, mind, and soul in a progressive, fully egalitarian community committed to tikkun olam, or social action, and to service that flows from an identification with the sacredness of all life. As a spiritual community grounded in the twin values of tikkun olam (social action) and a Divine connection meant to inspire us to live more holy and engaged lives, we feel that it is our duty and responsibility to speak out against injustice. As a Jewish community engaged with our historical narratives, we know that a large part of our own story has been shaped by being refugees and foreigners in strange lands. It is for this reason that the most repeated injunction in the Torah is the commandment to take care of and love the stranger. We know from our own families and historical stories what it is like to be strangers, and we are grateful and loyal to this country for the opportunities and blessings that it has provided. We have an obligation as religious, moral, and compassionate individuals to make sure that America continues to be a place where those marginalized can find economic security, freedom, and hope.

For all of these reasons and many more, we object to the repeal of the DACA program. As a faith community, we must advocate for our at-risk brothers

and sisters regardless of their religion, ethnicity, or country of origin. We believe in equality of opportunity for all.

**93. Santa Fe Monthly Meeting of the Religious Society of Friends (Quakers)**

DACA is important to our Meeting because as Quakers we are guided by the values of Equality and Community not only within our Meeting but also in the world around us. We care about DACA recipients because they are threatened with an assault on their humanity—tearing them away from their homes, often the only homes they know, uprooting them from their families, jeopardizing their education and employment and denying them their fundamental human dignity. We cannot be faithful to the Light that Spirit has granted us and ignore what is being done in our name to these brothers and sisters.

**94. Sikh Coalition**

The Sikh Coalition is a community-based civil rights organization that defends civil liberties, including religious freedom, for all Americans. Our mission is to promote educational awareness and advocacy, and provide legal representation in moving towards a world where Sikhs and other religious minorities may freely practice their faith without bias and discrimination. We are the largest community-based Sikh civil rights organization in the United States. Since its inception on September 11, 2001, the Sikh Coalition has worked to defend civil rights and liberties for all people, empower the Sikh community, create an environment where Sikhs can lead a dignified life unhindered by bias or discrimination, and educate the broader community about Sikhism in order to promote cultural understanding and diversity. The Sikh Coalition has vindicated the rights of numerous Sikh Americans subjected to bias and discrimination because of their faith. Ensuring the rights of religious and other minorities is a cornerstone of the Sikh Coalition's work, including the individuals who would be affected by the rescission of DACA.

**95. Society for the Advancement of Judaism**

The Society for the Advancement of Judaism (SAJ) is a synagogue located on the Upper West Side, with about 400 individual members. Within our community we have a standing SOJAC (Social Action Justice Committee) and an Immigrant Rights Action Team that seek to organize our members in support of fair and just immigration policies and to stand up for immigrant rights. We are active members of the Synagogue Coalition for Refugees and Immigrants, a coalition of New York synagogues fighting for the rights and dignity of refugees

and immigrants. We believe that Dreamers contribute greatly to our society and believe they should be given a pathway to citizenship.

**96. Southern California Nevada Conference of the United Church of Christ**

The Southern California Nevada Conference of the United Church of Christ (SCNCUCC) is an organization of 134 churches in Southern California and Southern Nevada. As such it is one of the most culturally and racially diverse conference in our denomination. Last year, SCNCUCC passed a resolution declaring becoming a sanctuary conference. This resolution is based on the belief on the biblical mandate of welcoming the “stranger and the alien.” Historically, our conference has stood on the side of the oppressed and the marginalized. The repeal of DACA would be in direct opposition to our call and our mission.

**97. Southwest Conference of the United Church of Christ**

The Southwest Conference of the United Church of Christ (UCC) is the regional body that provides support and services to 48 local UCC congregations and more than 300 clergy within Arizona, New Mexico and El Paso, Texas. We are proud of our progressive view of the Gospel and our mission statement, “extravagantly welcoming and affirming followers of Christ called to embody God’s unconditional justice and love” is manifested in the ways we live out every day.

The United States government for thirty years has failed to address immigration reform by enacting legislation to protect families and those fleeing persecution and poverty, and the federal government recently has stepped up detention and deportation of ordinary people—not dangerous criminals—resulting in cruel injustice, extreme hardship and family separation. We have therefore called upon the covenant partners of the Southwest Conference to prayerfully organize, advocate, act prophetically, preach and teach about immigration justice, including local, state and national legislation. Signing on to this amicus brief reflects that call to action.

**98. St. Andrew Presbyterian Church in Albuquerque, New Mexico**

Our congregation, founded in 1959, is part of the Presbytery of Santa Fe, Presbyterian Church (U.S.A.). Our mission is to proclaim and live the Good News of Jesus Christ by: listening to a loving God; celebrating our faith together; nurturing each other in Christian love and spiritual growth; working for social

justice and peace; reaching out in compassionate service; and being stewards of all God's gifts.

In March 2017, St. Andrew Presbyterian Church declared itself to be an ally church to the Sanctuary Movement. Since then we have provided financial support and volunteers to the movement, offered educational forums about immigration and participated in acts of public witness in support of undocumented immigrants and immigration policy reform. We do so because as Christians we are called to love our neighbor as ourselves, and Jesus puts no limitation on our love of neighbor. The undocumented young people who are covered under DACA are our neighbors. The repeal of DACA would tear apart their families and our communities, causing irreparable harm.

#### **99. St. Francis Community Services / Catholic Legal Assistance Ministry**

St. Francis Community Services is dedicated to serving families in need through community-based, culturally sensitive programs in the St. Louis Region. We work in the areas of legal aid, services to immigrants, and supportive services for others in our community who are vulnerable and marginalized. St. Francis of Assisi was chosen as the namesake and model for our organization because he embodies a selfless devotion to others, a simple way of life, and an unbounded love for the poor. Our organization upholds Catholic social teaching on immigration, which advocates embracing diverse newcomers and believes that in encountering immigrants, we encounter Christ. DACA youth are woven into the fabric of our country, and deserve the same opportunity to life, liberty, and pursuit of happiness that we as citizens—and children of God—do.

#### **100. St. Luke's Episcopal Church in Long Beach**

St. Luke's Episcopal Church in Long Beach was the first parish to declare itself a sanctuary parish in the Episcopal Diocese of Los Angeles. St. Luke's sees our commitment of standing with the oppressed and fighting against systems of oppression as part of our baptismal covenant. We welcome everyone equally and enthusiastically. Whatever religious background, age, race, gender, sexual orientation, or economic status, we welcome all. Scripture is clear that we should welcome the stranger in our midst and love one another as ourselves. St. Luke's strives to be a beacon of hope to all immigrants and people who are marginalized by an unjust society.

**101. St. Stephen's Episcopal Church in Boston**

St. Stephen's Episcopal Church of Boston, MA serves the South End/Lower Roxbury Community. We seek to meet the out-of-school time needs of young people and families in Boston and Chelsea. The decision to end DACA would impact individuals and families who reside in our parishes and broader communities. Ending residency for those currently protected by the DREAM Act would move our country further away from the principles of justice that we seek as people of faith. In addition, supporting those impacted by the ending of the DREAM act would add to our already demanding program load—thereby negatively affecting the entire community. We add our voice to those asking the court to protect Dreamers by not allowing the termination order to go into effect.

**102. St. Thomas of Canterbury Episcopal Church (Albuquerque, NM)**

St. Thomas of Canterbury Church values the lives, safety, gifts, perspectives and presence of immigrants and refugees in our nation and in our local community and we call for the ongoing support and protection of DACA recipients. Our baptismal covenant includes the vow to "seek and serve Christ in all people, loving our neighbors as ourselves." DACA recipients, immigrants, and refugees are our neighbors and we are compelled by our faith to seek and serve Christ in each one of them. Our baptismal covenant also includes the vow to "strive for justice and peace and respect the dignity of every human person." We believe that justice and peace are served when the rights of all people--especially vulnerable people, including immigrants and refugees, are protected.

**103. Stephen Wise Free Synagogue**

Stephen Wise Free Synagogue is a Reform Jewish congregation of over 800 member families located in the Upper West Side of Manhattan. Our history is deeply rooted in social justice values and our clergy and congregants have participated in and supported countless efforts to protect the rights of immigrants in this country. As our members are descendants of/are themselves immigrants and refugees, we see it as our role to support these communities.

As part of our social justice programs, our Immigration and Refugees Task Force fights for the rights of people in the United States and overseas and brings our community closer together through direct service, action, and advocacy. We work to support the integration of immigrants into our community consistent with Leviticus 19:34 "The alien who resides with you shall be to you as the citizen

among you; you shall love the alien as yourself, for you were aliens in the land of Egypt: I am the Lord your God.”

#### **104. T’ruah: The Rabbinic Call for Human Rights**

T’ruah: The Rabbinic Call for Human Rights is a network of 1,800 rabbis and cantors from all streams of Judaism that, together with the Jewish community, act on the Jewish imperative to respect and advance the human rights of all people. Grounded in Torah and our Jewish historical experience and guided by the Universal Declaration of Human Rights, we call upon Jews to assert Jewish values by raising our voices and taking concrete steps to protect and expand human rights in North America, Israel, and the occupied Palestinian territories. T’ruah's support of DACA is based in Jewish tradition and history. The Torah teaches the obligation to love the immigrant, just as God loves and cares for the immigrant: “The ger (immigrant) who sojourns with you shall be like a citizen unto you, and you shall love this person as yourself, for you were gerim in the land of Egypt. I am Adonai, your God.” (Leviticus 19:34) The ancient rabbis taught that the city of Sodom was considered the epitome of evil because the residents made laws prohibiting kindness to strangers. In addition, within the Jewish community, many families are alive today because of the relatively open immigration policies of the late 19th and early 20th centuries. And too many Jews died after being trapped in Europe when the borders closed in 1924. We understand the cruelty of forcing Dreamers back to the countries where they were born, but in many cases have never lived, and where—in some cases—their lives will be in danger.

#### **105. Temple Israel of Hollywood (CA)**

Temple Israel of Hollywood, Los Angeles was founded upon a dedication to social justice, through both thought and action. Leading Jewish thinkers, including Rabbis Mordechai Kaplan, Leo Baeck and Stephen S. Wise, gave sermons here about important social issues. In 1965, the Reverend Dr. Martin Luther King Jr. spoke movingly from the Temple’s pulpit about segregation, poverty, freedom, and human dignity. Ten years later, at the end of the Vietnam War, Bob Dylan sang “Blowin’ in the Wind” at a Temple seder. In keeping with this tradition and commitment to social justice, we are inspired to add our voice of support to this amicus brief.

#### **106. Temple Israel of the City of New York**

Temple Israel of the City of New York, founded in 1870, is a Reform Jewish synagogue that welcomes all who choose to worship, study and celebrate within

the Jewish community. Located on the Upper East Side on 75th street between Park and Lexington Avenues, we are a dynamic, inclusive neighborhood community. As a family of families, we are committed to building a diverse and inclusive congregation united by humanitarian values as expressed in our Jewish religious, educational, justice and social activities, and through these activities to create a rich, vibrant Judaism that enriches the lives of our congregants and responds to the demands of modern life.

Temple Israel of the City of New York stands on core Jewish values that affirm life and freedoms. Our people have been immigrants and refugees in need of aid from our ancestral days to now, and across our world history one of the greatest homes we have ever found is the United States of America. It is important to us that we keep America open as a land of opportunity for immigrants and refugees as it has been a promised land for so many. With that, to take away this great land of freedom from someone who has grown up in this country, is at home in this country, would be shameful and un-American; it goes against what makes America great, and to go back on this promise already made makes it even worse. The Torah tells us 36 times to aid the plight of the immigrant. Taking away the hand DACA has already extended is detrimental to our neighborhood, our New York City, our state, and country. We would see it reinstated immediately.

### **107. Temple Sinai (Washington, DC)**

Temple Sinai is one of the largest Reform Jewish congregations in the Washington, DC area. Organized in 1951, the congregation has over 1,200 member families. The Temple Sinai community offers a great breadth of opportunities for participating in worship, programs, and services for all ages, as well as a remarkable Religious education program and NAEYC-accredited Nursery School. The temple's mission statement and core values incorporate the primary reasons members belong to Temple Sinai – ritual observance, Jewish education, tikkun olam (repairing the world), belonging to a Jewish community and concern for Israel as a Jewish homeland. Temple Sinai has a distinguished tradition in each of these areas, with our particular focus through the lens of Reform Judaism.

Temple Sinai is committed to working on immigration issues in our country. Our own Jewish history of displacement as well as the Biblical injunction to “welcome the stranger” guide us in our work to welcome refugees, support those facing deportation, and strongly oppose the suspension of DACA.



### **108. Town and Village Synagogue, New York, New York**

Town and Village Synagogue is an egalitarian, traditional synagogue, affiliated with the Conservative Movement. Located in lower Manhattan, NYC, T&V welcomes all people to share in its activities irrespective of gender, sexual orientation, race, ethnicity or religion. In its strategic plan T&V identifies as one of its "Core Values" Gemilut Hasadim (loving kindness) "caring for one another; committed to social justice and Tikkun Olam (social responsibility); engaged with our local and global communities for the betterment of all." It is joining in this Amicus to fulfill the Biblical precept that there be "one law for the citizen and for the stranger who dwells among you" (Exodus 12:49).

T&V oppose changes to the DACA program that will affect those brought here as children, some of whom are still attending school or higher education, or currently work here and who have known no other home than the United States. If DACA were to be terminated, these young people -- Americans in every respect but citizenship -- could be deported to dangerous countries they have never known, separated from their families, and forced to survive alone, many without even knowing the language. Members of the synagogue have attended workshops to help immigrants get their affairs in order should they face sudden arrest or deportation orders, as immigration policies are summarily changed.

### **109. Trinity Church Wall Street**

Trinity Church Wall Street is a vibrant and growing Episcopal parish in Lower Manhattan. Guided by our core values of faith, integrity, inclusiveness, compassion, social justice and stewardship, Trinity's mission is to build our neighborhood, train leaders of Christian communities for the future, and help our partners become financially sustainable to support their ministries. Trinity is committed to serving the most vulnerable in our neighborhood and to advocating for justice on behalf of those whose voices are not heard, including immigrants and "Dreamers." We support fairness and safety for immigrants, whose contributions are essential to our city and our nation, and in that spirit, we oppose the termination of DACA.

We are concerned that ending DACA will mean that vulnerable people in our communities will be deported to countries they have little experience of, leaving dependent family members here; will lead them to live outside of the legal protections of New York City out of fear for their own safety; and will cause them to avoid the police, hospitals, schools, and other services designed for individual and public safety. Furthermore, the repeal of DACA is a turning back of policy

that asked undocumented people to register with the government in return for a protected status. The fact that such registration is being used to target and deport them is a profound betrayal of trust by the U.S. government that should give pause to any immigrant to this country of immigrants.

**110. Union for Reform Judaism, including the Reform Jewish Voice of New York State**

**111. Central Conference of American Rabbis**

**112. Women of Reform Judaism**

**113. Congregation B'nai Israel of Sacramento, CA**

The Union for Reform Judaism, whose 900 congregations across North America include 1.5 million Reform Jews, the Central Conference of American Rabbis (CCAR), whose membership includes more than 2000 Reform rabbis, Women of Reform Judaism that represents more than 65,000 women in nearly 500 women's groups in North America and around the world, and Congregation B'nai Israel of Sacramento, CA that has declared itself a sanctuary congregation come to this issue inspired by Jewish tradition that demands of us concern for the stranger in our midst.

**114. Unitarian Universalist Mass Action Network**

Unitarian Universalist Mass Action Network is a state action network that works in coalition with interfaith partners and organizations led by those who are directly affected by injustice. Our mission is to organize and mobilize Unitarian Universalists to confront oppression. It is through our social justice work that we live our values and principles that define our faith. One manifestation of oppression in which we deeply engage is immigrant rights. The level of cruelty, ignorance and hateful attacks perpetrated on immigrant communities is an offensive affront to human values. We are dedicated to confronting these attacks on families and the safety of our communities through building resistance networks. We support the DACA program and DACA recipients as part of our overall support for all immigrants. All families deserve the right remain together. Young people who have grown up in the US, were educated in our school systems and are integral members of our communities deserve to have a pathway to a legal status that allows them to work and obtain a post-secondary education. UU Mass Action works closely with many young leaders who have DACA status. Their families and friends are here and the only country they know is the US. Deporting these young people to a country where they typically know no one puts their lives

in danger. Tearing families apart and endangering lives is immoral. We will not remain silent and allow this to occur.

### **115. United Methodist Women**

United Methodist Women is one of the largest Protestant denominational faith organizations for women with approximately 800,000 members whose mission is fostering spiritual growth, developing leaders and advocating for justice. Our work includes service to women, children and youth in marginalized communities in the United States and support for such work around the world.

The US immigration system is broken. United Methodist Women has been working for reform for decades. Irregular migration status is not a crime, and should not be met with demonization, detention and deportation. DACA holders present particular urgency, as these young people do not remember any other country and are already leaders making important contributions in the US, including in our organization. We continue to work for broad immigration reform that includes regularization of status for millions of irregular migrants who have long-term residency in the US. Until that reform, we urge the protection of all migrants and their families through temporary status programs.

### **116. University Christian Ministry at Northwestern University**

UCM is a campus ministry of Northwestern undergraduate and graduate students who try to make faith relevant in daily life. UCM is an honest, safe, and inclusive community following the example of Jesus. We embrace openness, strive to love God, and serve others to the best of our ability. In keeping with those values, we welcome Northwestern students into our community regardless of immigration status, and believe that the termination of DACA without an adequate replacement would be a senseless injustice.

### **117. Visitation BVM Church in Philadelphia, Pennsylvania**

Visitation BVM is a multicultural Catholic parish located in the Kensington section of North Philadelphia. The majority of our parishioners come from Puerto Rico, the Dominican Republic, México, Honduras, Ecuador and Vietnam. Our mission is to preach Good News to an immigrant community who often struggle in their day to day living situations. These challenges have only increased over the past year as some of our members have been detained or deported.

Many of our young adults are protected by DACA, including our Pastoral Outreach Assistant. These young people call the United States their home. Some have little to no memory of the countries where they were born. They are in college or working as they strive to become productive members of society. These Dreamers are nervous about their future and want to make their families and their lives here in the U.S. - the country they call home.

Our church is a member of the New Sanctuary Movement and we were very involved in the sanctuary effort of Angela Navarro two years ago. We provided spiritual and material support to her and her family over the months she was in sanctuary. The Archdiocese of Philadelphia does not allow Catholic Churches to offer sanctuary so we collaborated with a neighboring Presbyterian Church. Our institution has not directly been the target of ICE raids but they have taken place in the neighborhood.

### **118. West End Synagogue (New York City)**

West End Synagogue is a Reconstructionist congregation, affiliated with the Reconstructionist Movement. Located on the Upper West Side of Manhattan, NYC, West End Synagogue is a diverse group of individuals and families committed to exploring Jewish life and creating an intellectually challenging, spiritually vibrant, and mutually supportive community. Utilizing the principles of Reconstructionist Judaism, we celebrate the richness and diversity of Jewish tradition through study, prayer, meditation, music and tikkun olam, or acts of repairing the world.

West End Synagogue opposes changes to the DACA program that will affect those brought here as children. Many of these children are attending school, pursuing higher education, or working here and have known no other home than the United States. If DACA were to be terminated, these young people—Americans in every respect but citizenship -- could be deported to dangerous countries they have never known. They would be separated from their families, and forced to survive alone, many without even knowing the language. As immigrants, or children and grandchildren of immigrants who fled oppression, we are particularly sensitive to the situation of these young people who call the United States home. According to the Torah, “You shall treat the stranger as your own.” Maintaining the DACA program is a critical step in this direction.

**119. Westminster Presbyterian Church of Santa Fé**

Our congregation is fully inclusive and affirming of all people regardless of nationality, immigration status, ethnicity, social status or gender and sexual orientation, and a member of the Presbytery of Santa Fé and the Presbyterian Church (USA). Our denomination has consistently and historically expressed support for the values, safety, gifts, and perspective for immigrants of all nations, and has also called for the ongoing support and protection of DACA recipients. By signing on to the Amicus Brief, we reiterate our belief that justice and peace are served when the rights of all people—especially vulnerable people, including immigrants and refugees, are protected.

**CERTIFICATE OF SERVICE**  
**CM/ECF FILING/SERVICE**

U.S. Court of Appeals Docket Nos.: 18-15068, 18-15069, 18-15070,  
18-15071, 18-15072, 18-15128, 18-15133, 18-15134

I, Steven A. Zalesin, hereby certify that on March 20, 2018, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit by using the appellate CM/ECF system.

Participants in the case who are registered CM/ECF users will be served by the appellate CM/ECF system.

Dated: March 20, 2018

**PATTERSON BELKNAP WEBB &  
TYLER LLP**

**MUSLIM ADVOCATES**

By: /s/ Steven A. Zalesin

Attorneys for *Amici Curiae* 119  
Religious Organizations