

Adeel A. Mangi (*admitted pro hac vice*)
Michael N. Fresco (*admitted pro hac vice*)
Zachary Kolodin (*admitted pro hac vice*)
PATTERSON BELKNAP WEBB
& TYLER LLP
1133 Avenue of the Americas
New York, New York 10036
Telephone: (212) 336-2000
Facsimile: (212) 336-2222

Johnathan Smith (*admitted pro hac vice*)
Sirine Shebaya (*admitted pro hac vice*)
Juvaria Khan (*admitted pro hac vice*)
MUSLIM ADVOCATES
P.O. Box 66408
Washington, DC 20035
(202) 897-2622

Attorneys for Amici Curiae 103 Religious Organizations

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

STATE OF TEXAS, *et al.*,

Plaintiffs,

v.

UNITED STATES OF AMERICA, *et al.*,

Defendants,

KARLA PEREZ, *et al.*,

Defendant-Intervenors,

and

STATE OF NEW JERSEY,

Defendant-Intervenor.

Case No. 1:18-cv-00068

**MEMORANDUM OF LAW FILED ON BEHALF OF 103 RELIGIOUS
ORGANIZATIONS AS *AMICI CURIAE* IN OPPOSITION TO PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

TABLE OF CONTENTS

	<u>Page</u>
INTERESTS OF <i>AMICI</i>	1
STATEMENT OF THE ISSUES TO BE RULED UPON BY THE COURT	4
SUMMARY OF THE ARGUMENT	4
ARGUMENT	6
I. RELIGIOUS ORGANIZATIONS SUPPORT DACA AS A JUST RESPONSE TO A HUMANITARIAN CRISIS	6
II. ENJOINING DACA WOULD CAUSE <i>AMICI</i> , THEIR CONGREGATIONS, AND THEIR COMMUNITIES IRREPARABLE HARM AND POSE A GRAVE THREAT TO PUBLIC WELFARE	9
A. Direct Harm to <i>Amici</i> and Their Congregants	10
B. Impairment of <i>Amici</i> 's Ability To Carry Out Their Missions	14
C. As Sensitive Locations for Immigration Enforcement Purposes, Some <i>Amici</i> Will be Called Upon to Provide Sanctuary, and May Become Targets for Immigration Raids.....	15
CONCLUSION.....	19

TABLE OF AUTHORITIES

	Page(s)
Cases	
<i>Byrum v. Landreth</i> , 566 F.3d 442 (5th Cir. 2009)	9
<i>Kalaw v. Ferro</i> , 651 F. Supp. 1163 (W.D.N.Y. 1987)	13
<i>Nunez v. Boldin</i> , 537 F. Supp. 578 (S.D. Tex. 1982)	13
<i>OCA Greater Houston v. Texas</i> , No. 1:15-cv-679-RP, 2016 U.S. Dist. LEXIS 118675 (W.D. Tex. Sep. 2, 2016)	15
<i>Opulent Life Church v. City of Holly Springs Mississippi</i> , 697 F.3d 279 (5th Cir. 2012)	14
<i>Texas v. United States</i> , 86 F. Supp. 3d 591 (S.D. Tex. 2015)	9
<i>Texas Marine & Brokerage v. Bennington Marine</i> , No. 1:12-CV-397, 2012 U.S. Dist. LEXIS 196805 (E.D. Tex. Oct. 17, 2012)	9
<i>Winter v. Natural Resources Defense Council, Inc.</i> , 555 U.S. 7 (2008)	6, 9
Other Authorities	
ABC-7 KVIA, <i>Which places are considered ‘sensitive locations’?</i> , http://www.kvia.com/crime/which-places-are-considered-sensitive-locations/338319025 (Feb. 16, 2017)	18
Alex Emmons, <i>The Intercept, Targeting a Sanctuary: After ICE Stakes Out a Church Homeless Shelter, Charities Worry Immigrants Will Fear Getting Help</i> , https://theintercept.com/2017/02/27/after-ice-stakes-out-a-church-homeless-shelter-charities-worry-immigrants-will-fear-getting-help/ (Feb. 27, 2017)	17
CBS News, <i>Undocumented immigrant, father of leukemia patient, takes refuge in Phoenix church</i> , https://www.cbsnews.com/news/undocumented-immigrant-father-of-leukemia-patient-takes-refuge-in-phoenix-church/ (Feb. 12, 2018, 7:20 AM).....	17

TABLE OF AUTHORITIES**Page(s)**

Council on American-Islamic Relations, <i>CAIR Condemns Trump’s Termination of DACA Program as ‘Pandering to Anti-Immigrant Extremists’</i> , 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)	7
Julie Carey, NBC Washington, <i>ICE Agents Arrest Men Leaving Fairfax County Church Shelter</i> , https://www.nbcwashington.com/news/local/ICE-Agents-Arrest-Men-Leaving-Alexandria-Church-Shelter-413889013.html (Feb. 15, 2017)	17
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	15
Odette Yousef, WBEZ 95.1 Chicago, <i>Amid Deportation Push, Suburban Church Grapples with Loss</i> , https://www.wbez.org/shows/wbez-news/amid-deportation-push-suburban-church-grapples-with-loss/3d269fc3-04e7-4604-bae4-a376a37410c9 (Feb. 15, 2016).....	18
Qué Pasa Mi Gente, <i>Arrestos de ICE cerca de escuela elemental de mayoría hispana</i> , https://charlotte.quepasanoticias.com/noticias/ciudad/local/arrestos-de-ice-cerca-de-escuela-elemental-de-mayoria-hispana (Feb. 9, 2017)	18
Religious Action Center of Reform Judaism, <i>Reform Jewish Movement Assails White House Targeting of Immigrant Youth</i> , https://rac.org/reform-jewish-movement-assails-white-house-targeting-immigrant-youth (Sept. 5, 2017)	8
Sanctuary Movement, http://www.sanctuarynotdeportation.org/	8
Tina Vasquez, Rewire, <i>Have Trump’s Mass Deportations Begun? Immigration Arrests Reported Around the Country</i> , https://rewire.news/article/2017/02/10/trumps-mass-deportations-begin-immigration-arrests-reported-around-country/ (Feb. 10, 2017).....	18
U.S. Department 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)	16
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	16

TABLE OF AUTHORITIES

Page(s)

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)7

INTERESTS OF *AMICI*

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 enjoining DACA would 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.

Amici are: Albuquerque Mennonite Church; Albuquerque Monthly Meeting of the Religious Society of Friends (Quakers); American Association of Jewish Lawyers and Jurists (AALJ); American Baptist Churches of Metropolitan New York; American Friends Service Committee; American Jewish Committee; Ansche Chesed, New York City; Arch Street United Methodist Church; 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 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 Jeshurun (New York City); Congregation Beit Simchat Torah; Congregation Shaarei Shamayim (Madison, Wisconsin); Council on American-Islamic Relations – Michigan Chapter; Council on American-Islamic Relations – New Jersey Chapter; Council on American-Islamic Relations – New York Chapter; Council on American-Islamic Relations – Oklahoma Chapter; 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 Action; Episcopal City Mission; Episcopal Diocese of Massachusetts; Episcopal Diocese of Western Massachusetts; Episcopal Society of Christ Church/The Christ Church Cathedral, Cincinnati, Ohio; First Presbyterian Church of Taos, New Mexico; Franciscan Friars of the Province of St. Barbara; Global Justice Institute; Hawaii Conference of the United Church of Christ; Hyattsville Mennonite Church; Interfaith Alliance of Iowa; Islamic Circle of North America; ICNA Council for Social Justice; Islamic Society of Central Jersey; Jewish Council for Public Affairs; Lab/Shul; Leadership Conference of Women Religious; Legal Advocacy Project of Unitarian Universalist FaithAction of New Jersey; Living Interfaith Church of Lynnwood, WA; Lutheran Advocacy Ministry – New Mexico; Maryknoll Office for Global Concerns; Men of Reform Judaism; 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 State Council of Churches; New York Yearly Meeting, the Religious Society of Friends (Quaker); Northern California Nevada Conference of the United Church of Christ; Pacific Northwest Conference of the United Church of Christ; Presentation Sisters at Caminando Juntos; Reform Temple of Forest Hills; Religious Institute; Romemu; Santa Fe Monthly Meeting of the Religious Society of Friends (Quakers); Sikh Coalition; Sisterhood of Salaam Shalom; Social Action Committee of First Unitarian Universalist Church of Austin (TX); 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; Synod of the Northeast, Presbyterian Church (U.S.A.); 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); Trinity Church Wall Street; Union for Reform Judaism, including the Reform Jewish Voice of New York State; Unitarian Universalist Mass Action Network; Unitarian Universalist Service; Unitarian Universalists for Social Justice; United Methodist Women; Upstate New York Synod-Evangelical Lutheran Church in America; Visitation BVM Church in Philadelphia, Pennsylvania; West End Synagogue (New York City); Women of Reform Judaism.

STATEMENT OF THE ISSUES TO BE RULED UPON BY THE COURT

Before entering a preliminary injunction enjoining DACA, the Court must conclude, *inter alia*, that the public interest and the balance of harm favor its issuance. Here, if the requested injunction is granted, *amici*'s congregants will be deported to the detriment of their congregations and communities, *amici*'s humanitarian missions will be thwarted, and *amici* risk being targeted for immigration raids for honoring their conviction to protect DACA recipients. Do the public interest and balance of harm nonetheless favor granting the requested injunction?

SUMMARY OF THE ARGUMENT

Since DACA's inception in 2012, American religious communities of many faiths have supported it as a just and compassionate response to a moral and humanitarian crisis. The children and young adults who are eligible for or have benefitted from DACA (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. If the Court grants Plaintiffs' requested injunction these individuals would face deportation to unfamiliar and often dangerous 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 opposition to Plaintiffs' request for a preliminary injunction in order to address how, in their view, the requested injunction itself would cause (rather than prevent) 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 enjoining DACA would cause. For example, ending DACA would put Andrea, a legal assistant at *amicus* American

Friends Service Committee in New Jersey, who came to the United States from Ecuador when she was not even two years old, at risk of deportation. *Amici* detail the stories of Andrea 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 requested injunction is entered 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 enjoined, because 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 Defendant-Intervenors' and other *amici*'s briefs, *amici* urge the Court to deny Plaintiffs' request for a preliminary injunction.

ARGUMENT

Plaintiffs have moved to enjoin the 2012 memorandum creating DACA, which would halt DACA in full. (*See* Dkt. 5.) As explained in Defendant-Intervenors' briefs, Plaintiffs' application should be denied, *inter alia*, because the balance of equities amongst the parties and the public interest weigh strongly against enjoining DACA. *See, e.g., Winter v. NRDC, Inc.*, 555 U.S. 7, 20 (2008). *Amici* endorse the arguments set forth by Defendant-Intervenors, and submit this brief to further illustrate the irreparable harm that enjoining DACA would inflict upon *amici* and the public at large.

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

Amici support 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."¹ 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 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

¹ 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.

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 recent efforts to repeal DACA. On September 5, 2017, when the federal 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.”² 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.”³ And *amici* Union for Reform Judaism and Central Conference of American Rabbis

² 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).

³ 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).

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.”⁴

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.⁵ 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 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

⁴ 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).

⁵ See Sanctuary Movement, <http://www.sanctuarynotdeportation.org/>.

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 any effort to terminate DACA, including the injunction requested in this case. As institutions of faith with a special interest in servicing vulnerable immigrant populations, *amici* have direct knowledge of the harm that such an injunction would cause to them and the people with whom they live, work, and worship.

II. ENJOINING DACA WOULD CAUSE AMICI, THEIR CONGREGATIONS, AND THEIR COMMUNITIES IRREPARABLE HARM AND POSE A GRAVE THREAT TO PUBLIC WELFARE

Enjoining DACA would not only imperil Defendant-Intervenors, it would directly harm *amici* and their congregants, clergy members, staff, clients, and communities.⁶ In the words of *amicus* Church Council of Greater 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 end of DACA 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

⁶ Harm to *amici* is relevant to the third and fourth prongs of the preliminary injunction test. *See Winter*, 555 U.S. at 20 (plaintiff must demonstrate “that the balance of equities tips in his favor, and that an injunction is in the public interest”). Under the third prong, the Court must “balance the competing claims of injury” amongst the parties. *Id.* at 24 (internal quotation marks omitted). Harm to New Jersey-based *amici* equates to harm to Defendant-Intervenor New Jersey, who, as *parens patriae*, represents *amici*’s interests in this lawsuit. *See Texas v. United States*, 86 F. Supp. 3d 591, 625 (S.D. Tex. 2015) (“[P]arens patriae recognizes the interests that the State has in the well-being of its populace.”) (internal quotation marks omitted). Under the fourth prong, the Court must consider whether the requested injunction would “disserve the public interest.” *Byrum v. Landreth*, 566 F.3d 442, 445 (5th Cir. 2009). As members of the American public and leaders of religious communities across the country, *amici* are representative of the public interest. *See Tex. Marine & Brokerage v. Bennington Marine*, No. 1:12-CV-397, 2012 U.S. Dist. LEXIS 196805, at *24 (E.D. Tex. Oct. 17, 2012) (denying request for preliminary injunction because “the harm that it would inflict on a third party not represented in this action” would “disserve the public interest”).

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 requested injunction would cause harm on various levels. First, DACA recipients are vital members of amici’s congregations and workforces, and DACA’s end will not only disrupt the lives of those individuals but also harm *amici*, who benefit from their participation and work. Second, enjoining DACA would 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* 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 if DACA were enjoined.

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.⁷ 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

⁷ 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.

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.

Nonetheless, Nancy was active in her faith 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 DACA, 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 potential end of DACA represents "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 DACA, 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 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, enjoining DACA would lead to drastic and dangerous change. It would mean the end of access to the work that he loves and a halt to his career after graduation. Moreover, it would mean "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 to raise money for the church.

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 DACA, 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, enjoining DACA would bring her dream to a halt and

threaten to send her to Ecuador, a place in which she has not 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 the end of DACA 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 Plaintiffs obtain the relief they seek, 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.

Granting the requested injunction 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 *Opulent Life Church v. City of Holly Springs Miss.*, 697 F.3d 279, 296 (5th Cir. 2012) (finding zoning ordinance caused church irreparable harm because it “frustrate[d]

[the church's] religious mission" and "community service programs"); *OCA Greater Hous. v. Texas*, No. 1:15-cv-679-RP, 2016 U.S. Dist. LEXIS 118675, at *12 (W.D. Tex. Sep. 2, 2016) (finding irreparable harm to non-profit group where election law "hindered" one of the group's "core missions—promoting civic participation and civic education"). *Amici* cannot reach people in need if those people are hiding in the shadows or have been deported. If the requested injunction is granted, *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 unnecessary 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, and May Become Targets 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").⁸ 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

⁸ 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.

worship, a school, a hospital or doctor's office or other sensitive location.”⁹ The ICE sensitive locations policy remains in effect today, at least as an official matter.¹⁰

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 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

⁹ 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).

¹⁰ 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>.

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."¹¹

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, last 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.¹² 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 and their enforcement policies near churches. ICE responded to neither.¹³ 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

¹¹ 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).

¹² 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).

¹³ 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).

wore vests that said “Police.” A retired ICE supervisor, interviewed after the fact, praised this strategy as “actually . . . quite creative.”¹⁴

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.¹⁵ Students witnessed the arrests as they passed by in school buses.¹⁶ In El 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.¹⁷

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 sown fear and anxiety

¹⁴ 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).

¹⁵ 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).

¹⁶ 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%2Fcharlotte.quepasanoticias.com%2Fnoticias%2Fciudad%2Flocal%2Farrestos-de-ice-cerca-de-escuela-elemental-de-mayoria-hispana>.

¹⁷ ABC-7 KVIA, *Which places are considered ‘sensitive locations’?*, <http://www.kvia.com/crime/which-places-are-considered-sensitive-locations/338319025> (Feb. 16, 2017).

among *amici* and their congregants and supporters. These concerns will be greatly exacerbated if the requested injunction is granted and DACA is enjoined.

CONCLUSION

For the foregoing reasons, *amici* respectfully urge the Court to deny Plaintiffs' motion for preliminary injunction.

Dated: July 20, 2018
New York, New York

Respectfully submitted,

PATTERSON BELKNAP WEBB & TYLER LLP

By: /s/ Adeel A. Mangi

Adeel A. Mangi (*admitted pro hac vice*)

Michael N. Fresco (*admitted pro hac vice*)

Zachary Kolodin (*admitted pro hac vice*)

1133 Avenue of the Americas

New York, New York 10036

Telephone: (212) 336-2000

Facsimile: (212) 336-2222

aamangi@pbwt.com

mfresco@pbwt.com

zkoldin@pbwt.com

Johnathan Smith (*admitted pro hac vice*)

Sirine Shebaya (*admitted pro hac vice*)

Juvaria Khan (*admitted pro hac vice*)

MUSLIM ADVOCATES

P.O. Box 66408

Washington, DC 20035

(202) 897-2622

johnathan@muslimadvocates.org

sirine@muslimadvocates.org

juvaria@muslimadvocates.org

*Attorneys for Amici Curiae 103 Religious
Organizations*

APPENDIX A

IDENTITY AND INTERESTS OF AMICI

1. **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.

2. **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.

3. **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.

4. 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.

5. 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.

6. American Jewish Committee

Ever since AJC was founded in 1906, it has supported generous and liberal immigration policies. It continues to do so today, particularly through the work of its institutes the Muslim Jewish Advisory Council and the Belfer Institute of Latino Affairs.

7. Anshe 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 as 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 violation of basic human rights.

9. 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.

10. 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!

11. 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.

12. 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.

13. 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.

14. 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.

15. 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.

16. 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.

17. 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.

18. 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.

19. 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.

20. 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.

21. 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.

22. 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.

23. 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.

24. 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.

25. 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.

26. 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.

27. 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.

28. 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.

29. 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 to allowing the termination order to go into effect.

30. 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.

31. 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.

32. Emgage Action

Emgage Action 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.

33. 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

34. Episcopal Diocese of Massachusetts

35. 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.

36. 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.

37. 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.

38. 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.

39. 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.

40. 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.

41. 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.

42. 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.

43. Islamic Circle of North America

44. 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.

45. 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.

46. Jewish Council for Public Affairs

The Jewish Council for Public Affairs (“JCPA”) is an umbrella organization whose members consist of 125 local community relations councils; and 16 national Jewish agencies, which include civil and human rights organizations and religious bodies representing the four major streams of Judaism in the United States (Orthodox, Conservative, Reform and Reconstructionist). JCPA builds consensus amongst its members in responding to current events and adoption of public policy positions. JCPA has a long-standing position endorsing comprehensive immigration reform which would provide a pathway to legal status for undocumented immigrants, including specific support for adoption of laws that would allow so-called “Dreamers” to become American citizens. JCPA also has had long-standing policy positions opposing detention for most persons crossing our borders without proper documentation, especially with respect to those seeking asylum and other vulnerable groups, and calling for the narrow tailoring of enforcement efforts within local communities. JCPA believes that these positions, for which it has consistently advocated in Congress and elsewhere, advance civil and human rights, are consistent with our religious beliefs and obligations, and will ultimately benefit the US economy and our security. Issuance of the injunction sought by Plaintiffs in this case would contravene these JCPA policy positions and, more importantly, would be injurious to the public interest.

47. 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.

48. 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.

49. 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.

50. 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.

51. 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.

52. 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.

53. 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.

54. 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.

55. 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)).

56. 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.

57. 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.

58. 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.

59. 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.

60. 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.

61. 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.”

62. New Mexico Conference of Churches

63. Lutheran Advocacy Ministry – New Mexico

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.

64. 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.

65. 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.

66. New Sanctuary CT

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

67. 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 Rabbinat 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.

68. New York State Council of Churches

With the spirit of ecumenism and hospitality, the New State Council of Churches lives into God's call to do justice and to love your neighbor. We point to the Kingdom of God on earth where the marginalized are freed from poverty and discrimination, where prisoners can be restored to live happier and healthier lives, and where we help people of all ages grow in their Christian discipleship.

We represent eight mainline denominations in New York (American Baptist, Episcopalian, Society of Friends, Evangelical Lutheran Church of America, Reformed Church of America, United Church of Christ, United Methodist Church, Presbyterian USA), which have all made statements and taken strong steps to counter discrimination against refugees, immigrants and undocumented people. We view with alarm the destabilizing effect of immigration policies which, at best, leave so many people in limbo and at worst actively discriminate against people who live in our communities and contribute to our common life. It is wrong that Deferred Action for Childhood Arrivals was slated for termination by the president which will lead to deportations of young people to countries they have never lived in. Congressional inaction to make the law permanent is also of grave concern. DACA recipients registered in good faith and

now to have the rules changed on them is just immoral after releasing information to authorities which could be used against them and their families should the program be terminated. We strongly support the court decision to support the DACA program and stop its elimination. We strongly hope the decision to continue the program will be upheld on appeal.

69. New York Yearly Meeting, the Religious Society of Friends (Quaker)

Faith and Practice, the Book of Discipline of the New York Yearly Meeting of the Religious Society of Friends (Quaker), the umbrella organization for 68 Friends Meetings and Worship Groups in New York, New Jersey and Connecticut, expresses our commitment to speaking out in support of “those the world neglects, exploits, or condemns.” The immigrant being pursued by the state is of especial concern to Friends. In Faith and Practice, we declare: “We can draw no clear line between religious and secular affairs. We find ways to serve God in the world. We expect each Friend to live each day in holy obedience, secure in the faith that the Light illumines all relationships. Accordingly, Friends are enjoined to have a deep concern for the welfare of the community. This involves intelligent care for the dignity and welfare of all; love for adversaries, not merely for those who love us; and special care for those whom the world neglects, exploits, or condemns.” We stand with all those being persecuted for their immigration status. We are committed to caring for the newcomers in our midst who seek to become our neighbors and to speaking out on their behalf.

70. 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.

71. 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.

72. 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.

73. Reform Temple of Forest Hills

The Reform Temple of Forest Hills is a welcoming Jewish congregation of 250 families in Queens, NY, dedicated to spirituality, learning, outreach, and service to the community. As part of our social action programming, our Task Force on Immigrants and Refugees takes inspiration from both our spiritual teachings and our family histories to advocate for just and humane public policies while reaching out to individuals in need. For these reasons we strongly support the continued implementation of DACA.

74. 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.'

75. 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.

76. 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.

77. 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.

78. Sisterhood of Salaam Shalom

We are the only national grassroots organization dedicated to building trust, respect and relationships between Muslim and Jewish women. Based on those relationships, we commit to putting an end to hate of one another. It is not only an honor but the responsibility of the Sisterhood of Salaam Shalom to do whatever we can to make every child living in the US secure and to make every parent, grandparent, sibling and other relative worry-free regarding the safety

of their children and their whole family being able to live in what is supposed to be the greatest country in the world.

79. Social Action Committee of First Unitarian Universalist Church of Austin (TX)

The Social Action Committee of First Unitarian Universalist Church of Austin supports this amicus brief because we uphold to the ancient, moral imperative to welcome the stranger among us. Our moral values demand that these persons, brought here as children, be treated with inherent worth and dignity and that their contributions to our society be recognized, valued and supported. To separate these folks from their families, the only society they have ever known and to remove them from their positions of contributing to our communities, would be cruel, rob us of their worthy contributions and be immoral in the extreme.

80. 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.

81. 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.

82. 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.

83. 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.

84. 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.

85. 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.

86. 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.

87. Synod of the Northeast, Presbyterian Church (U.S.A.)

The Synod of the Northeast is a regional body of the Presbyterian Church (U.S.A.). We fully support the DACA program and all other ways we might support the rights and dignity of immigrants coming to our country.

88. 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.

89. 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.

90. 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.

91. 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.

92. 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.

- 93. Union for Reform Judaism, including the Reform Jewish Voice of New York State**
- 94. Central Conference of American Rabbis**
- 95. Women of Reform Judaism**
- 96. Men of Reform Judaism**

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.

97. 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.

98. Unitarian Universalist Service

The Unitarian Universalist Service Committee is a human rights organization inspired by Unitarian Universalist principles and powered by grassroots collaboration. UUSC began its

work in 1939 when Rev. Waitstill and Martha Sharp took the extraordinary risk of traveling to Europe to help refugees escape Nazi persecution. A moral commitment to protecting the rights and dignity of persons, particularly those seeking refuge from violence, discrimination, persecution, and natural disasters, has been at the center of our organization's mission for more than 75 years. Drawing on this history, and grounded in the Unitarian Universalist principle that all people have inherent worth, UUSC advocates for the preservation of the DACA program, passage of a clean Dream Act, and other policies that uphold the right of all immigrants and asylum-seekers to live with dignity.

99. Unitarian Universalists for Social Justice

Unitarian Universalists for Social Justice (UUSJ) is a nonprofit religious and educational advocacy organization whose members comprise individuals and congregations. Founded in 2000, the mission and work of UUSJ is grounded in the principles of the Unitarian Universalist faith which recognizes the inherent worth and dignity of every person, the responsibility of the larger community to seek justice, equity and compassion in human relations, and the interdependent web of all existence of which we are a part.

UUSJ seeks to mobilize and amplify the voices of UUs throughout the nation on matters of federal public policy. One of UUSJ's priorities is comprehensive immigration reform, including the fair and compassionate treatment of immigrants regardless of legal status.

On moral, economic, and social grounds UUSJ supports the continuation of the Deferred Action for Childhood Arrival (DACA) program.

Moral grounds: DACA recipients are human beings whose worth and dignity deserve our respect. DACA immigrants were brought to the U.S. as children. They have grown up in the U.S. and become assimilated into this country and learned its culture and language. For most, the U.S. is the only country they have ever known. Many have limited or no familiarity with or connection to their "country of origin".

Economic grounds: In almost all cases, DACA holders are contributing members of American society. Most DACA holders already contribute to the U.S. economy by working. (A recent survey showed 80% hold jobs.) They pay taxes, they help pay their family's bills, and they support local and regional economies. Others are studying and will be even more valuable members of our society in the future.

Social grounds: DACA holders are often members of families of mixed immigration statuses—over half of DACA holders have siblings who are U.S. citizens. Individuals are intrinsically important to their family and families are the glue and strength of American society.

For the above moral, economic and social reasons, UUSJ believes forcing those in the DACA program to leave the U.S. is immoral and cruel. Families should not be separated by ending the DACA program. UUSJ opposes the State of Texas's efforts to enjoin DACA.

100. 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.

101. Upstate New York Synod-Evangelical Lutheran Church in America

The Upstate New York Synod is one of 65 synods in the ELCA. The synod contains 162 congregations that are grounded in Jesus Christ, focused in prayer and working for justice and peace for all. We oppose the termination of the DACA program for a number of reasons. It tears families apart, sends people back to countries where their lives are threatened, and is contrary to our country's historical values and moral grounding.

102. 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.

103. 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.