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18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA  
20 SAN FRANCISCO DIVISION

21 THE REGENTS OF THE UNIVERSITY OF  
22 CALIFORNIA and JANET NAPOLITANO,  
in her official capacity as President of the  
University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND  
26 SECURITY and ELAINE DUKE, in her  
official capacity as Acting Secretary of the  
Department of Homeland Security,

27 Defendants.  
28

CASE NO. 17-CV-05211-WHA

**DECLARATION OF EDGARDO GARCIA**

Date: December 20, 2017  
Time: 8:00 a.m.  
Judge: Honorable William Alsup  
Dept.: Courtroom 8

Complaint Filed: September 14, 2017  
Trial Date: February 05, 2018

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,  
  
Plaintiffs,  
  
v.  
  
U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,  
  
Plaintiffs,  
  
v.  
  
UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,  
  
Defendants.

CASE NO. 17-CV-05380-WHA

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CASE NO. 17-CV-05813-WHA

<p>COUNTY OF SANTA CLARA and SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 521,</p> <p>Plaintiffs,</p> <p>v.</p> <p>DONALD J. TRUMP, in his official capacity as President of the United States, JEFFERSON BEAUREGARD SESSIONS, in his official capacity as Attorney General of the United States; ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security; and U.S. DEPARTMENT OF HOMELAND SECURITY,</p> <p>Defendants.</p>
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I, **EDGARDO GARCIA**, declare and state as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently thereto.
2. I am the Chief of Police of the San Jose Police Department (“SJPD”) of the City of San Jose, California (“San Jose”). I have served as a police officer since 1992, including as a patrolman, sergeant, lieutenant, captain, deputy chief, assistant chief, and now chief of police. I have a Bachelor’s Degree from Union Institute and University after having moved to San Jose from San Juan, Puerto Rico at a young age.
3. As stated on its website, <http://www.sjpd.org/COP/MissionStatement.html>, the “San Jose Police Department is a dynamic, progressive and professional organization dedicated to maintaining community partnerships which promote a high quality of life for the City’s diverse population. The Department is committed to treating all people with dignity, fairness and respect, protecting their rights and providing equal protection under the law.” The website can be translated into 40 languages, which demonstrates the diversity of our city.
4. SJPD’s mission is: “To promote public safety; To prevent, suppress, and investigate crimes; To provide emergency and non-emergency services; To create and maintain strong community

1 partnerships; To adapt a multidisciplinary approach to solving community problems; To develop and  
2 promote a diverse, professional workforce.”

3 5. To fulfill its mission, the SJPD engages in community policing. The community policing  
4 model requires active, engaged, and empowered neighborhood residents who freely interact with police  
5 without reservations. It is critical that all residents, no matter their immigration status, are able to report  
6 crimes and assist in criminal investigations without fear that their immigration status will also be  
7 investigated.

8 6. San Jose has consistently been rated one of the “Safest Big Cities” in the nation. I  
9 believe that part of the reason for our low crime rate is the trust that the SJPD has with all segments of  
10 our community.


11 7. As part of SJPD’s mission to keep San Jose safe, I and the entire SJPD engage in  
12 community outreach. Among the activities we undertake as part of that mission are “Coffee with a Cop,”  
13 regular informal neighborhood meetings, “day walks” and “night walks” with officers,  
14 community/police workshops, neighborhood watch, and others. These events are particularly  
15 concentrated in the most diverse neighborhoods, where the immigrant population is dominant. The City  
16 also has created the role of community liaison officer with the Mexican Consulate for the specific  
17 purpose of reaching out to new immigrant communities.

18 8. Additionally, the SJPD during the course of its investigations routinely deals with  
19 immigrants. Our officers are explicit in telling those who participate in these investigations that  
20 immigration status does not matter, and we encourage victims and witnesses, even those who may be  
21 undocumented, not to be afraid to report crimes and deal with law enforcement.

22 9. My officers and I have already seen in the community fear and uncertainty in the  
23 immigrant community since the election of President Donald Trump and the announcement of the  
24 DACA’s rescission. This presence of fear and uncertainty makes it harder for the SJPD to fulfill its  
25 mission to protect the public and also imposes obstacles in the focus on treating all people equally. It  
26 has been my experience that the SJPD that increases in federal immigration enforcement invariably  
27 require police officers to work even harder to make clear the distinction between immigration  
28

1 enforcement and local law enforcement, which is necessary to maintain trust and cooperation in  
2 immigrant communities.

3 I declare under the penalty of perjury under the laws of the United States that the foregoing is  
4 true and correct and that this declaration was executed on October 26, 2017 at SAN JOSE,  
5 California.

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8 EDGARDO GARCIA

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18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SAN FRANCISCO DIVISION**

21 THE REGENTS OF THE UNIVERSITY OF  
CALIFORNIA and JANET NAPOLITANO,  
in her official capacity as President of the  
22 University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND  
SECURITY and ELAINE DUKE, in her  
26 official capacity as Acting Secretary of the  
Department of Homeland Security,

27 Defendants.  
28

CASE NO. 17-CV-05211-WHA

**DECLARATION OF GABRIEL GARCIA,  
MD**



1 STATE OF CALIFORNIA, STATE OF  
2 MAINE, STATE OF MARYLAND, and  
STATE OF MINNESOTA,

3 Plaintiffs,

4 v.

5 U.S. DEPARTMENT OF HOMELAND  
6 SECURITY, ELAINE DUKE, in her official  
7 capacity as Acting Secretary of the Department  
of Homeland Security, and the UNITED  
STATES OF AMERICA,

8 Defendants.

CASE NO. 17-CV-05235-WHA

9 CITY OF SAN JOSE, a municipal corporation,

10 Plaintiffs,

11 v.

12 DONALD J. TRUMP, President of the United  
13 States, in his official capacity, ELAINE C.  
DUKE, in her official capacity, and the  
UNITED STATES OF AMERICA,

14 Defendants.

CASE NO. 17-CV-05329-WHA

15 DULCE GARCIA, MIRIAM GONZALEZ  
16 AVILA, SAUL JIMENEZ SUAREZ,  
17 VIRIDIANA CHABOLLA MENDOZA,  
NORMA RAMIREZ, and JIRAYUT  
LATTHIVONGSKORN,

18 Plaintiffs,

19 v.

20 UNITED STATES OF AMERICA, DONALD  
21 J. TRUMP, in his official capacity as President  
22 of the United States, U.S. DEPARTMENT OF  
HOMELAND SECURITY, and ELAINE  
23 DUKE, in her official capacity as Acting  
Secretary of Homeland Security,

24 Defendants.

CASE NO. 17-CV-05380-WHA

1 COUNTY OF SANTA CLARA and  
2 SERVICE EMPLOYEES INTERNATIONAL  
UNION LOCAL 521,

3 Plaintiffs,

4 v.

5 DONALD J. TRUMP, in his official capacity  
as President of the United States, JEFFERSON  
6 BEAUREGARD SESSIONS, in his official  
capacity as Attorney General of the United  
7 States; ELAINE DUKE, in her official  
capacity as Acting Secretary of the Department  
8 of Homeland Security; and U.S.  
DEPARTMENT OF HOMELAND  
9 SECURITY,

10 Defendants.

CASE NO. 17-CV-05813-WHA

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1 I, GABRIEL GARCIA, MD, DECLARE:

2 1. I am a Professor of Medicine at Stanford University School of Medicine and served  
3 as the Associate Dean of Admissions from 1999 to 2014.

4 2. As Associate Dean for Medical School Admissions, my duties consisted of chairing  
5 the committee that made admissions decisions on applicants to Stanford University School of Medicine.

6 3. In approximately October 2012, in my capacity as Associate Dean, I spoke to Jirayut  
7 “New” Latthivongskorn about his interest in applying to medical school during an annual pre-med  
8 student conference at UC Davis. We discussed his immigration status, which was undocumented at that  
9 time, as he informed me. We also discussed the recent DACA executive action and its impact on  
10 medical school admissions policies.

11 4. I indicated to him that there was still significant uncertainty regarding the effects of  
12 DACA on medical school admissions policies. I indicated to him, that some medical schools would be  
13 hesitant to invest their resources in training undocumented individuals who might be unable to stay in  
14 the United States to complete their medical education or a physician residency program

15 5. I next interacted with Mr. Latthivongskorn by email in approximately February to  
16 March 2013, regarding Stanford Medicine’s admissions policies for DACA beneficiaries. I indicated to  
17 him that under Stanford Medicine’s then-current policy, he would be treated as an international student  
18 applicant if he applied, which raised the issue of eligibility for financial aid. Even if he were admitted,  
19 paying for tuition and related costs could be challenging—financial aid available to United States  
20 citizens or eligible noncitizens would likely not be available to a student like him. Furthermore, there  
21 was still uncertainty regarding how DACA’s provisions would impact admissions at Stanford Medicine  
22 under its then-current policy.

23 6. Subsequent to my email exchanges with New, however, Stanford Medicine instituted  
24 clear policies that individuals who have been granted DACA at the time of application are eligible to  
25 apply and matriculate to Stanford Medicine. Additionally, individuals who have met all other  
26 requirements and are otherwise undocumented are permitted to apply and matriculate to Stanford  
27 Medicine, and eventually became eligible to participate in Stanford’s financial aid program. However, if  
28

1 DACA is canceled without any legislative provision for the status of undocumented pre-med students  
2 who benefited from the program, the uncertainty and challenges that such students previously faced may  
3 return.  
4

5 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
6 and correct.  
7

8 Executed on October 30, 2017, in Palo Alto, California.

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11 Gabriel Garcia, MD  
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**EXHIBIT 28**

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

20 THE REGENTS OF THE UNIVERSITY OF  
21 CALIFORNIA and JANET NAPOLITANO,  
22 in her official capacity as President of the  
23 University of California,

Plaintiffs,

v.

25 U.S. DEPARTMENT OF HOMELAND  
26 SECURITY and ELAINE DUKE, in her  
27 official capacity as Acting Secretary of the  
28 Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

**DECLARATION OF SAN FRANCISCO  
DISTRICT ATTORNEY GEORGE GASCÓN**

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,  
  
Plaintiffs,  
  
v.  
  
U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05235-WHA

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Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,  
  
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v.  
  
UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,  
  
Defendants.

CASE NO. 17-CV-05380-WHA

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COUNTY OF SANTA CLARA and  
SERVICE EMPLOYEES INTERNATIONAL  
UNION LOCAL 521,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, in his official capacity  
as President of the United States, JEFFERSON  
BEAUREGARD SESSIONS, in his official  
capacity as Attorney General of the United  
States; ELAINE DUKE, in her official  
capacity as Acting Secretary of the Department  
of Homeland Security; and U.S.  
DEPARTMENT OF HOMELAND  
SECURITY,  
  
Defendants.

CASE NO. 17-CV-05813-WHA



1 I, George Gascón, declare:

2 1. I am the District Attorney for the City and County of San Francisco. I have been the San  
3 Francisco District Attorney since 2011. Prior to becoming the District Attorney, I served as the San  
4 Francisco Chief of Police from August, 2009 through January, 2011. Before moving to San Francisco, I  
5 served as the Chief of Police in Mesa, Arizona for three years, and served in the Los Angeles Police  
6 Department for over twenty years. I have over 30 years' experience in law enforcement.

7 2. The goal and mission of my agency is to make San Francisco the safest large city in  
8 America by working to implement a modern justice system that focuses on crime prevention, victims,  
9 and violent offenders. I believe we are safer together when we remove barriers for victims of crime,  
10 work with the community to address neighborhood concerns, and provide services to our city's most  
11 vulnerable populations.

12 3. It is impossible to meet this goal and effectively police and prosecute if the communities  
13 you serve do not trust you. The absence of trust leads to reduced reporting of crimes and an  
14 unwillingness to work with law enforcement in order to ensure dangerous people are held accountable  
15 for their actions. This dynamic results in violent offenders getting away with crimes and recidivating  
16 because many members of our community are afraid to come forward. It is naïve to think that  
17 unreported crimes and criminals do not pose a threat that extends far beyond immigrant communities.

18 4. Immigrants, and in particular undocumented immigrants, fear interactions with law  
19 enforcement and distrust government agencies. Research shows that 70 percent of undocumented  
20 immigrants polled in a 2013 study were less likely to contact law enforcement authorities if they were  
21 victims of a crime. What's worse, 44 percent of Latinos surveyed, not just undocumented immigrants,  
22 reported being less likely to contact police officers if they have been the victim of a crime because they  
23 fear that police officers will use this interaction as an opportunity to inquire into their immigration status  
24 or that of people they know. University of Illinois at Chicago, Lake Research Partners: Insecure  
25 Communities: Latino Perceptions of Police Involvement in Immigration Enforcement, May 2013.

26 5. The current fear and distrust of law enforcement agencies is currently impacting my  
27 agency's ability to effectively ensure public safety. For example, my office recently prosecuted a  
28 domestic violence case that went to trial. At trial, a witness was cross-examined by a Deputy Public

1 Defender about her immigration status, with the line of questioning suggesting that she was testifying in  
2 order to secure a U-VISA for her cooperation. A judge ruled that the line of questioning was irrelevant,  
3 as the witness learned about the U-VISA program only after having reported the crime. The jury was  
4 unable to reach a verdict, and when we sought to retry the case the witness indicated she was unwilling  
5 to testify again in part due to the fact that her immigration status had become a focal point during the  
6 trial. As a result, we had to dismiss the case and the offender was not held accountable for his violent  
7 actions.

8 6. That fear and distrust of law enforcement has a detrimental impact on public safety has  
9 been my historical experience as well. When I came to Mesa to serve as Chief of Police, the city was  
10 experiencing increased violent and property crime. During my tenure there we were able to reduce both  
11 kinds of crime substantially. However, during that same time, in the unincorporated area of Maricopa  
12 County policed by Joe Arpaio's Sheriff's Department, crime was increasing. Between 2004 and 2007,  
13 Sheriff Arpaio presided over a 69 percent *increase* in violent crime rates, a 166 percent *increase* in  
14 homicides, and a *plummeting* arrest rate. Bolick, Clint. "Mission Unaccomplished: The Misplaced  
15 Priorities of the Maricopa County Sheriff's Office." *Goldwater Institute*, 2 Dec. 2008. We found that a  
16 reason crime was going up just across city lines, while in similar communities within city limits crime  
17 was going down, was because we began to develop a relationship with our community members who  
18 were willing to report crime and work with us. In the case of the Maricopa County Sheriff's  
19 Department, people were afraid to report crimes because they did not know if they, or a neighbor, could  
20 be deported as a result.

21 7. It is these experiences that have led me to take steps to ensure my office is accessible to  
22 all communities. For example, in 2013 my agency partnered with local community leaders to launch an  
23 immigration fraud public education campaign. The multilingual campaign in English, Spanish, and  
24 Chinese educated immigrant communities how to ensure an immigration consultant they had chosen was  
25 licensed or bonded. The campaign helped warn immigrant communities about scammers who made  
26 false claims of influence with government officials. Many were being defrauded by people who said  
27 they could move a client to the front of the line for work permits or U.S. visas. I have also moved our  
28 victim advocates out into the community in places where members of our immigrant community feel

1 safe coming to report crimes. It is my experience that undocumented immigrants often do not feel safe  
2 entering the Hall of Justice due to the significant police presence.

3 8. On a citywide basis, a key strategy is San Francisco's Sanctuary City status. This enables  
4 victims and witnesses to report crimes without fear that there will be an inquiry into their immigration  
5 status or someone they know.

6 9. Establishing trust will remain difficult as long as undocumented immigrants feel unsafe  
7 coming forward. That is why the language we are seeing from our President in the media, which is  
8 making entire immigrant communities-our neighbors, friends and family-feel unsafe, is so harmful.  
9 These statements are making our immigrant communities less likely to come forward and work with  
10 authorities both as victims and witnesses. Our system only functions when the community works with  
11 us, and it is incredibly difficult to make people feel like they are part of our community and to bring  
12 them out of the shadows and ensure they feel safe reporting crimes to police when they often view local  
13 law enforcement authorities as closely associated with the views and aims of the federal government and  
14 this President.

15 10. Having served in multiple states and jurisdictions, and working with various communities  
16 as both a police officer and prosecutor, I have seen that public safety is highly dependent on cooperation  
17 from all members of our community-including immigrants. In fact, a recent study from the University  
18 of California, San Diego demonstrates the benefit of policies proven to enhance cooperation. Their  
19 study found that there are broad benefits for local jurisdictions that resist complying with federal  
20 immigration enforcement, concluding that there are, on average, 35.5 fewer crimes committed per  
21 10,000 people in sanctuary jurisdictions compared to non-sanctuary counties. Wong, Tom. "The Effects  
22 of Sanctuary Policies on Crime and the Economy." *Center for American Progress*, 26 Jan. 2017. The  
23 study also found that working with federal immigration made it harder for local police agencies to  
24 investigate crime because witnesses and victims who were in the country illegally were less likely to  
25 come forward if they thought they risked being detained or deported.

26 11. Based on my own experiences and studies such as the aforementioned, I can conclude  
27 that my agency's ability to fulfill its mission depends on immigrants being able to come out of the  
28 shadows and work with law enforcement without fear of immigration consequences.



**EXHIBIT 29**

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

THE REGENTS OF THE UNIVERSITY OF  
CALIFORNIA and JANET NAPOLITANO,  
in her official capacity as President of the  
University of California,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND  
SECURITY and ELAINE DUKE, in her  
official capacity as Acting Secretary of the  
Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

**DECLARATION OF KATHARINE GIN**

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,  
  
Plaintiffs,  
  
v.  
  
U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,  
  
Plaintiffs,  
  
v.  
  
UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,  
  
Defendants.

CASE NO. 17-CV-05380-WHA

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COUNTY OF SANTA CLARA and  
SERVICE EMPLOYEES INTERNATIONAL  
UNION LOCAL 521,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, in his official capacity  
as President of the United States, JEFFERSON  
BEAUREGARD SESSIONS, in his official  
capacity as Attorney General of the United  
States; ELAINE DUKE, in her official  
capacity as Acting Secretary of the Department  
of Homeland Security; and U.S.  
DEPARTMENT OF HOMELAND  
SECURITY,  
  
Defendants.

CASE NO. 17-CV-05813-WHA



1 I, KATHARINE GIN, DECLARE:

2 1. I am the co-founder and executive director of Educators for Fair Consideration  
3 (“E4FC”), a fiscally sponsored project of Community Initiatives. We empower undocumented young  
4 people in their pursuit of education and careers, and as part of our programs we provide scholarships to  
5 undocumented college and graduate students. I have personal knowledge of the facts set forth in this  
6 declaration, and if called as a witness, I could and would competently testify to them.

7 2. I first met Jirayut “New” Latthivongksorn in 2010 when he applied to and was awarded a  
8 scholarship from E4FC. Although application to our scholarship is highly competitive (only 4-6%  
9 acceptance rate), New immediately rose to the top of our selection pile in 2010, and again in 2011. He  
10 was academically outstanding, had overcome numerous financial obstacles in order to pursue his  
11 undergraduate education at UC Berkeley, and was committed to supporting low-income students in  
12 higher education and beyond.

13 3. In 2012, New founded Pre-Health Dreamers (PHD) with two other undocumented young  
14 people whom he met through E4FC’s scholarship program. They saw the need to share information  
15 among undocumented students nationally because of their own challenges pursuing careers in  
16 health/sciences. About six months after PHD was founded, PHD officially became a project of E4FC,  
17 and for the past five years I have had the privilege of advising PHD with fundraising, administration,  
18 and overall organizational growth. New and PHD inspire and support youth in underserved  
19 communities to pursue education and career in the health and sciences fields. New personally is engaged  
20 in mentorship for PHD members, and has led workshops on application review, interview preparation,  
21 and self-advocacy skills.

22 4. I have met many extraordinary young people in my more than 20 years of working with  
23 highly motivated, low-income students. New stands well above the rest. His steadfast devotion to public  
24 service, his commitment to removing systemic barriers to education, and his impact as a healthcare  
25 provider are all at a capacity far beyond what his age, position and academic commitments would seem  
26 to allow.

27 5. New, like many of the young people I work with, is a DACA recipient. The work  
28 authorization that New receives through DACA enables him to work in the medical profession and to

1 continue his education, which involves real-world training in hospitals and other health facilities. By  
2 affording him the opportunity to attend medical school, DACA also allows him to contribute to the  
3 education of his fellow classmates through the sharing of his story and the challenges he has faced in  
4 accessing healthcare on account of his low-income and immigrant status.

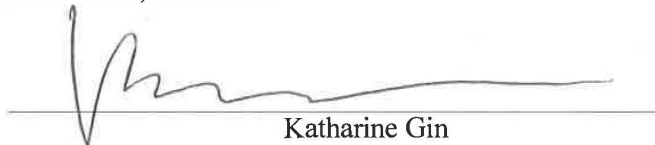
5 6. Without continued access to DACA and the work authorization that it provides him, New  
6 would be unable to complete his medical training and reach his full potential, and it is unlikely New  
7 would be able to work in the United States as a medical doctor.

8 7. If New is not allowed to work as a medical doctor, it would be a tremendous loss to the  
9 underserved communities he wants to serve. His personal experience growing up in a low-income  
10 immigrant family with limited access to medical care allows him to connect emotionally to underserved  
11 communities and makes him extremely adept at delivering care. Low-income communities need medical  
12 professionals like New who can relate to people who do not necessarily speak English, are unfamiliar  
13 with the U.S. health care system, and/or are undocumented and afraid to come forward and access care.

14 8. New's story is just the tip of the iceberg: discontinuation of DACA would mean that  
15 thousands of other bright and talented undocumented young people would likely abandon their pursuit  
16 of careers in health and sciences. This would be a huge loss of people ready and able to positively affect  
17 society, and would inflict harm on the medical community. There is already a shortage of qualified  
18 medical professionals. Discontinuing DACA would prevent people like New from joining their ranks,  
19 further reduce the future supply of qualified medical professionals, and make this country's need for  
20 medical professionals even more serious, particularly for those who are low-income or who do not speak  
21 English. In my opinion, this creates a public safety and public health risk.

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

23 Executed on October 30 2017, in San Francisco, California.

24  
25   
26 Katharine Gin

# **EXHIBIT 30**

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18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SAN FRANCISCO DIVISION**

21 THE REGENTS OF THE UNIVERSITY OF  
22 CALIFORNIA and JANET NAPOLITANO,  
23 in her official capacity as President of the  
24 University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND  
26 SECURITY and ELAINE DUKE, in her  
27 official capacity as Acting Secretary of the  
28 Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

**DECLARATION OF LISA M. GONZALES**

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,  
  
Plaintiffs,  
  
v.  
  
U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,  
  
Plaintiffs,  
  
v.  
  
UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,  
  
Defendants.

CASE NO. 17-CV-05380-WHA

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COUNTY OF SANTA CLARA and  
SERVICE EMPLOYEES INTERNATIONAL  
UNION LOCAL 521,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, in his official capacity  
as President of the United States, JEFFERSON  
BEAUREGARD SESSIONS, in his official  
capacity as Attorney General of the United  
States; ELAINE DUKE, in her official  
capacity as Acting Secretary of the Department  
of Homeland Security; and U.S.  
DEPARTMENT OF HOMELAND  
SECURITY,  
  
Defendants.

CASE NO. 17-CV-05813-WHA

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I, Lisa M. Gonzales, declare:

1. I am the Assistant Superintendent of Educational Services at Dublin Unified School District, and my prior experience includes working as a superintendent, principal, and math/science teacher. I am also currently the President of the Association of California School Administrators (ACSA), and in that capacity I have had the opportunity to speak with educators around the State of California regarding the impact of the federal government’s decision to terminate the Deferred Action for Childhood Arrivals (DACA) program. I am providing this declaration in my individual capacity based on my personal knowledge and experience, which includes conversations with students, parents and educators around the state.

2. One of the responsibilities of my current job is to create the best possible teaching and learning environment for all the students and staff at Dublin USD. Although there are many factors involved in creating an optimal learning environment, without question schools must be considered safe places where students and parents feel welcome. In California, one of the ways we ensure that students feel safe and are ready to learn is that we promise them that the simple act of coming to school will not expose them or their families to federal immigration enforcement action. This is not a matter of taking a position on immigration policy, it is a basic necessity for a school environment where all students can learn and thrive.

3. My understanding is that the point of the DACA program is to provide security and stability for the “Dreamers,” young people who were brought to this country as children and who have demonstrated they will be productive contributors to our society by succeeding in school and in the workforce. Dreamers include college students and young working adults, but within the K-12 public school system they also include high school students, teachers and other school staff, and the parents of our students. As school officials we do not ask our students or parents about their federal immigration status, and do not always know which students and parents are in the DACA program. But we are keenly aware of the school environment in all of our schools, including those serving largely immigrant populations.

1           4.       Since the beginning of this year, I have noticed an increasing amount of uncertainty and  
2 fear among students, parents and staff due to statements and actions by federal officials related to  
3 immigration policy. From my perspective, there appears to be a cumulative impact of the threat that  
4 many members of our community may face deportation, followed by announcements that the federal  
5 government would retaliate against state and local entities that declare themselves “sanctuary”  
6 jurisdictions, and now the decision to terminate the DACA program.

7           5.       I am aware of many examples of harm to students, parents and staff from the general  
8 actions of the federal government related to immigration enforcement, threatening statements of federal  
9 officials, and more specifically, from the decision to terminate the DACA program. Most of the  
10 information I have gathered is from fellow educators from different regions of the state who, like me,  
11 are constantly interacting with students, parents and staff in our schools. The common denominator in  
12 these stories is that many California students are effectively being denied an education because threats to  
13 their security, and the security of their peers and families, have stolen their hope for the future and left  
14 them unwilling or unable to continue to engage and thrive in school.

15           6.       For example, a colleague and superintendent from Monterey County, has collected some  
16 heartbreaking stories about students, former students, parents and teachers who are in the DACA  
17 program. One Dreamer comes from a family in severe poverty and has worked to help support the  
18 family while attending high school. She was recently accepted to the University of California and wants  
19 to study medicine and, given her 4.1 GPA, tenacity and work ethic, she was poised to succeed. The  
20 announcement that DACA will be terminated has left her feeling abandoned and she has fallen into  
21 depression. Her grades are falling and she is afraid to commit to a future that may no longer be  
22 available for her.

23           7.       Another student in high school in Salinas, California, dreams of joining the Air Force and  
24 studying electronics. A local teacher describes him as a passionate patriot who wants to serve this  
25 country, the only country he has ever known. She believes the DACA decision could make or break this  
26 young man, and potentially deprive our armed forces of an amazing and intelligent talent.  
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1           8.     I was provided details of an interview with a parent who, for obvious reasons, wished to  
2 remain anonymous. She came to the United States 13 years ago and has three children in the public  
3 school system; the eldest is a citizen and the other two are in the DACA program. Although her  
4 youngest son has been a straight “A” student and hopes to go to college to study the sciences, his future  
5 is now uncertain, his grades are falling, and he has withdrawn from his family and friends.

6           9.     Finally, a principal of a middle school in Riverside County told me that she reviewed the  
7 parent sign-in sheets from parent-teacher conferences that were conducted just a couple weeks ago, and  
8 found she had 67% less parent participation compared to last year. She also discussed a major drop in  
9 parents attending the school’s English-Learner Advisory Council, with monthly meetings that used to  
10 average about 130 parents down to only 20 to 30 parents during the last two months. She noted that  
11 many of the families that do still attend school events are no longer willing to sign-in, and have spoken  
12 to her about concerns regarding their safety going to and from school events. I heard a similar account  
13 from an elementary school principal in Yolo County.

14           10.    These stories are just a few illustrations of the broad and harmful impact of the  
15 termination of DACA on students and parents. Students are showing increased anxiety and fear,  
16 decreased engagement and attendance, increased behavioral issues, and a general disillusionment and  
17 lack of motivation to complete school and/or continue to progress toward their former goals of attending  
18 college or joining the workforce. Parents are no longer participating in classroom and school activities,  
19 sometimes not even enrolling their children in free and reduced lunch programs. Many of the students  
20 and parents are afraid that their families will be separated in the process of deportation.

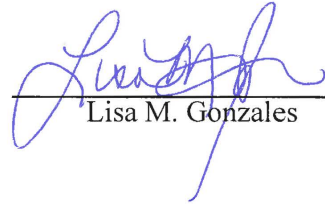
21           11.    Many California students attend schools serving largely immigrant populations. But it is  
22 important to note that the deteriorating school environment impacts all of our students, not just those  
23 threatened by the elimination of DACA. An optimal teaching and learning environment requires a  
24 vibrant and diverse community of students, parents and staff. Targeting some members of the  
25 community for exclusion harms the entire community. As an educator, I know that we must restore a  
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healthy school environment for all our kids if we hope to ensure our social, economic and political future.

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

Executed on October 26, 2017, at Alameda County, California.

  
\_\_\_\_\_  
Lisa M. Gonzales

# **EXHIBIT 31**

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18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SAN FRANCISCO DIVISION**

21 THE REGENTS OF THE UNIVERSITY OF  
22 CALIFORNIA and JANET NAPOLITANO,  
23 in her official capacity as President of the  
24 University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND  
26 SECURITY and ELAINE DUKE, in her  
27 official capacity as Acting Secretary of the  
28 Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

**DECLARATION OF ROBERTO  
GONZALES, PH.D.**

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,  
  
Plaintiffs,  
  
v.  
  
U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,  
  
Plaintiffs,  
  
v.  
  
UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,  
  
Defendants.

CASE NO. 17-CV-05380-WHA

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COUNTY OF SANTA CLARA and  
SERVICE EMPLOYEES INTERNATIONAL  
UNION LOCAL 521,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, in his official capacity  
as President of the United States, JEFFERSON  
BEAUREGARD SESSIONS, in his official  
capacity as Attorney General of the United  
States; ELAINE DUKE, in her official  
capacity as Acting Secretary of the Department  
of Homeland Security; and U.S.  
DEPARTMENT OF HOMELAND  
SECURITY,  
  
Defendants.

CASE NO. 17-CV-05813-WHA

1 I, Roberto Gonzales, declare:

2 1. I am a Professor of Education with tenure at Harvard University. I teach in the Harvard  
3 Graduate School of Education, which was ranked by the U.S. News & World Report as the number one  
4 school of education nationally. I write this declaration in support of all Plaintiffs in the related-lawsuits  
5 regarding the Deferred Action for Childhood Arrivals program, commonly known as DACA.

6 2. I am an expert on immigrant incorporation. I have written two peer-reviewed books and  
7 have authored several peer-reviewed journal articles, book chapters, and reports on this subject. I have  
8 studied undocumented immigrant youth and young adults for more than fifteen years. In fact, my  
9 research, including a twelve-year longitudinal study in Los Angeles and a five-year national study on the  
10 effects of DACA, are the most comprehensive studies on this population. I received a Ph.D. in  
11 sociology in 2008. I have held tenure track academic appointments at the University of Washington and  
12 the University of Chicago. I have attached a true and complete copy of my curriculum vitae to this  
13 Declaration.

14 3. When DACA was created in 2012, I launched a national research project to study the  
15 program's effects on its recipients. In 2013, sixteen months after the program's implementation, my  
16 team at Harvard surveyed 2,684 DACA eligible young adults, of those, 2,381 had obtained DACA by  
17 the time of the survey. We recruited respondents through a range of local and national organizations,  
18 consular offices, college and university campuses, GED programs, and community-based organizations.  
19 Because we were interested in understanding how a range of the DACA-eligible population was  
20 accessing this new status, we purposely drew our sample so as to include roughly one-third respondents  
21 with a high school diploma or less, one-third with some college experience, and one-third with a college  
22 degree (Associate's degree or higher). It is difficult to obtain survey data from undocumented  
23 populations because they comprise a fairly small proportion of the U.S. population, and because of their  
24 legal vulnerability and their low-income background (Bloch, 2006). Surveying them through random  
25 dialing methods, respondent driven sampling, or other types of probability sampling can be quite costly,  
26 and sometimes cost-prohibitive, especially on a national scale. We therefore relied on a sample drawn  
27 through a web survey and a multistage recruitment process—including “gateway” organizations  
28 (immigrant service agencies, law offices, churches, schools, universities, and local and national

1 undocumented young adult organizations), snowball sampling, and targeted efforts to find harder-to-  
2 reach individuals to learn about the short-term benefits of DACA on the lives of some recipients.

### 3 Life Before DACA

4 4. My research into undocumented immigrants long predates DACA—extending back 15  
5 years. From 2002 to 2015, I followed 150 undocumented young adults in Los Angeles, examining the  
6 ways they responded to adolescent and adult transitions and an accompanying shrinking of rights.<sup>1</sup>  
7 Comparing the experiences of a group of college-goers with a group of young people who discontinued  
8 their schooling at or before high school graduation, I found that over time even those who had attained  
9 advanced degrees shared similar work and life outcomes with their less-educated peers. That is, once  
10 they finished their academic programs, their options for employment were similar to those of their lesser  
11 achieving counterparts who had not finished high school—college graduates had little choice but to  
12 enter into the informal, low-wage labor market.

13 5. My research into the adolescent and adult transitions of undocumented immigrant young  
14 people shows how they undergo unique developmental trajectories during adolescence that compare  
15 negatively to their American born and citizen peers.<sup>2</sup> I conceptualize this process as a *transition to*  
16 *illegality*.

17 6. Undocumented young adults cannot legally work, vote, receive financial aid, or drive in  
18 most states, and deportation remains a constant threat. Unauthorized residency status thus has little  
19 direct impact on most aspects of childhood but is a defining feature of late adolescence and adulthood.  
20 As such, the life course trajectories of undocumented immigrant young people look markedly different  
21 than those of their American-born and citizen peers.

22 7. Due to their constitutional access to K-12 education, undocumented children grow up to a  
23 large extent protected from the limits of their immigration status, as they attend public schools and  
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26 <sup>1</sup> I highlight their stories in my book, *Lives in Limbo: Undocumented and Coming of Age in America*  
(2016).

27 <sup>2</sup> Jeffrey Jensen Arnett, *Emerging Adulthood: A Theory of Development from the Late Teens through the*  
28 *Twenties*, 55 AMERICAN PSYCHOLOGIST 469 (2000).



1 develop their identities alongside U.S.-born and citizen peers. Childhood thus constitutes a period of  
2 integration for undocumented children, as their school experiences allow them to develop feelings of  
3 belonging to the United States as well as expectations and life aspirations rooted in American culture.

4 8. It is not until adolescence that undocumented youth begin to directly confront the social  
5 implications of their undocumented status, at which point they enter a critical developmental period of  
6 discovery. Although some undocumented youth are cognizant of their immigration status before their  
7 teenage years, being undocumented only becomes salient when matched with experiences of exclusion.  
8 At the time when they begin to require state identifications for driving, working, and travelling,  
9 undocumented youth come to realize how lacking legal status will thwart them from developing their  
10 desired adult lives. Characterized by confusion, frustration, and vulnerability, this critical  
11 developmental period comprises a major “turning point” in the lives of undocumented youth, producing  
12 a jolting shift in their self-perceptions and pressing them to make their transitions into adulthood within  
13 same social confines as their undocumented parents.

14 9. For many undocumented youth, knowledge about their immigration status depresses their  
15 motivations and renders pursuing educational trajectories both financially unrealistic and meaningless.<sup>3</sup>  
16 Unable to access federal financial aid makes it impossible for most undocumented youth to finance their  
17 higher education.

18 10. Further, just as they experience a shrinking of access, their familial and financial  
19 responsibilities increase, pressing them to find work in the underground economy and help support their  
20 families. A small minority of undocumented youth are able to enroll in postsecondary institutions due in  
21 large part to other external factors such as consistent support from educators, counselors, parents, and  
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23

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24 <sup>3</sup> Leisy J. Abrego, *Legitimacy, Social Identity, and the Mobilization of Law: The Effects of Assembly Bill*  
25 *540 on Undocumented Students in California*, LAW & SOCIAL INQUIRY 33(3) (2009); Leisy J. Abrego, *I*  
26 *Can't Go to College Because I Don't Have Papers: Incorporation Patterns of Undocumented Latino*  
27 *Youth*, 4 LATINO STUDIES 212-231 (2006); Roberto G. Gonzales, *On the Wrong Side of the Tracks: The*  
28 *Consequences of School Stratification Systems for Unauthorized Mexican Students*, 85 PEABODY  
JOURNAL OF EDUCATION 469 (2010); Carola Suárez-Orozco, Marcelo M. Suárez-Orozco, and Irina  
Todarova, *LEARNING IN A NEW LAND: IMMIGRANT STUDENTS IN AMERICAN SOCIETY* (2008).

1 other mentors—all of whom contribute to instilling in youth optimistic outlooks and work ethics to  
 2 pursue their dreams. This, however, is not the norm.

3 11. Ultimately, the transition to “illegality” for undocumented youth involves a gradual,  
 4 adaptive process that wears them down and leaves them precarious in uncertain legal conditions.  
 5 Without work authorization or financial aid to pursue their educational goals, undocumented youth are  
 6 pressed to relinquish their aspirations to accept poorly paid and often physically demanding work with  
 7 other undocumented workers in the underground economy.

8 12. Further, having to lead adult lives without work authorization or driver’s licenses not  
 9 only increases their risk of police encounters and deportation, but undermines their moral standing,  
 10 diminishing their feelings of self-worth and belonging to mainstream society.<sup>4</sup> In response,  
 11 undocumented youth learn to avoid immigration authorities, abide closely to traffic laws, and constantly  
 12 look over their shoulders in case of police.

13 13. Further, they grow vigilant toward strangers, avoid potentially threatening situations, and  
 14 learn to conceal their immigration status to strangers, authorities, employers, and even friends and  
 15 romantic partners. Over time these conditions take their toll on young immigrants’ minds and bodies,  
 16 leaving them physically fatigued, emotionally drained, and feeling increasingly hopeless about their  
 17 future possibilities. The young people I met described physical and emotional manifestations of stress:  
 18 chronic headaches, toothaches, ulcers, difficulty sleeping problems, eating disorders, and thoughts of  
 19 suicide.

20 14. Further, as they associate themselves with other low-skilled and undocumented migrant  
 21 laborers, they adopt similar lifestyles and perspectives, gradually assuming roles as undocumented  
 22 immigrants who must live in fear, with minimal prospects, and limited rights. By their late twenties,  
 23 undocumented young people complete their transition to “illegality,” finding themselves in stagnated  
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25 <sup>4</sup> Hirokazu Yoshikawa, Carola Suárez-Orozco, and Roberto G. Gonzales, *Unauthorized status and youth*  
 26 *development in the United States: Consensus statement of the society for research on adolescence*, 27  
 27 *JOURNAL OF RESEARCH ON ADOLESCENCE* 4-19 (2017); Carola Suárez-Orozco, Hirokazu Yoshikawa,  
 28 Robert Teranishi, and Marcelo Suárez-Orozco, *Growing Up in the Shadows: The Developmental*  
*Implications of Unauthorized Status*, 81 *HARVARD EDUC. REV.* 438-473 (2011).

1 and uncertain situations. Accordingly, the transition to “illegality” involves a process that leaves them  
2 emotionally worn down and feeling hopeless about their futures.

3 15. Those who make it to postsecondary education are able to minimize and delay some of  
4 these transformations by avoiding low-wage work and remaining in institutional contexts that tend to  
5 support their aspirations and educational progress. However, college goers are not immune to  
6 immigration status-related threats, family responsibilities, financial concerns, and fears of deportation.  
7 Accordingly, few are able to avoid low-wage informal work to finance their studies, and many leave  
8 school in order to save money for their education.

9 16. Even college goers learn to accept that their immigration status—not their dreams—will  
10 shape most of their future plans. Without access to work authorization at the end of their studies,  
11 educated undocumented young persons face the same limited range of low-wage job opportunities as  
12 other undocumented immigrants, arriving even less prepared and more vulnerable than their peers who  
13 dropped out of school before them.

14 17. Undocumented young people grow up in communities around the country and attend  
15 school alongside American-born and citizen peers. But as friends are obtaining driver’s licenses, taking  
16 after-school jobs, and thinking about college, their immigration status prohibits them from accessing  
17 important rites of passage. For many, these barriers are debilitating. And, over the years, their levels of  
18 stress and anxiety grow. Excluded from financial aid for college and unable to secure the kinds of jobs  
19 their American born and citizen peers were taking, my respondents had no choice but to exist as second-  
20 class members of our society, living in fear in a shadow economy.

### 21 **The Benefits of DACA**

22 18. But things changed for many young people in 2012 when DACA was created. In five  
23 years, DACA has provided its recipients opportunities to access broader forms of adult life and to  
24 benefit from their investments in education. It has also allowed them important opportunities to  
25 contribute to their families, communities, and the United States economy. DACA recipients have made  
26 enormous gains. They have experienced social mobility. They have increased their educational  
27 attainment. They have experienced improved mental health. And they have a greater sense of  
28 belonging. None of these gains are trivial. DACA has provided its recipients access to the American

1 Dream and new forms of social mobility. They now lead everyday lives with much more breathing  
2 room and without fear of deportation.

3 19. My team at Harvard surveyed 2,684 DACA eligible young adults in 2013, sixteen months  
4 after DACA was created. Of those, 2,381 had obtained DACA by the time of the survey.

5 20. Just sixteen months into the program, 59 percent of respondents had obtained a new job,  
6 and a significant portion (45 percent) had increased their job earnings. Just over one fifth of survey  
7 respondents had obtained a paid internship, which likely provided valuable career training not typically  
8 available in jobs for young adults with limited employment histories. In addition, DACA recipients  
9 began building credit.<sup>5</sup> Almost one-half of survey respondents opened up their first bank account after  
10 receiving DACA. And roughly one-third of our respondents had acquired their first credit card. Close  
11 to 60 percent of our respondents had obtained a driver's license. And, twenty-one percent of those we  
12 surveyed had acquired health care after receiving DACA, perhaps due to new education- or  
13 employment-based plans or to greater facility in providing documentation to clinics and hospitals.

14 21. Particularly impressive, our survey pointed to DACA's strong impact on recipients  
15 finding new opportunities in education and employment. Though having DACA benefited all recipients,  
16 the effects were especially pronounced for DACA recipients attending higher education and those with  
17 higher education degrees, who have been able to match their educational attainment and degrees with  
18 high skilled jobs. Respondents who attended community and four-year colleges were more likely than  
19 their peers with no college experience to obtain a new job and increase their earnings.

20 22. Aiding in their success, DACA college graduates had multiple mentors in high school,  
21 they were active in clubs and in leadership roles in school, they were involved in their communities, and  
22 they were connected to organizations. As a result, these young people likely possessed the social  
23  
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25 \_\_\_\_\_  
26 <sup>5</sup> Although undocumented immigrants are not necessarily prohibited from possessing a bank account,  
27 the receipt of a Social Security number through DACA allows young people to overcome bureaucratic  
28 hurdles and sometimes awkward or uncomfortable situations when trying to open a bank account.  
Similar hindrances apply to obtaining a credit card.

1 networks and information that allowed them to maximize DACA's benefits to access job-related  
2 opportunities.

3 23. We found that the improved earnings of DACA recipients were helping them to access  
4 higher education.<sup>6</sup> While DACA does not remove restrictions from federal financial aid, DACA holders  
5 were better able to earn and save money for college tuition, related fees, and books. What's more, while  
6 DACA recipients continued to provide financial support to their parents, their increased earnings  
7 through DACA allowed them greater flexibility to pay for college. We also found that more modestly  
8 educated DACA recipients were successful in finding trade schools and occupational certificate  
9 programs.

10 24. Following up on our survey, we were interested in how DACA recipients were  
11 experiencing their status. So, in 2015 and 2016, we carried out face-to-face interviews with 481 DACA  
12 recipients in Arizona, California, Georgia, New York, Illinois, and South Carolina. This carefully drawn  
13 sample provides a unique opportunity to understand how DACA is affecting the educational trajectories  
14 of a wide range of young adult immigrants.<sup>7</sup> The evidence we gained from the survey provided a  
15 detailed picture of how DACA was working for a diverse cross-section of young people.

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18 <sup>6</sup> Roberto G. Gonzales, Benjamin Roth, Kristina Brant, Jaein Lee, and Carolina Valdivia, *DACA at Year*  
19 *Three: Challenges and Opportunities in Assessing Education and Employment, New Evidence from the*  
20 *UnDACAmented Research Project*, AMERICAN IMMIGRATION COUNCIL (Feb. 2016)  
[http://immigrationpolicy.org/sites/default/files/docs/daca\\_at\\_year\\_three.pdf](http://immigrationpolicy.org/sites/default/files/docs/daca_at_year_three.pdf).

21 <sup>7</sup> We used purposive sampling methods to generate a sample of DACA recipients exhibiting a range of  
22 educational experiences. Based on the DACA requirements for eligibility, the participants screened by  
23 the authors were under the age of 31 as of June 15, 2012; had arrived in the United States before age 16;  
24 had accumulated at least five years of continuous residence in the United States; and had no felony  
25 convictions, significant misdemeanors, or more than two other misdemeanors. Because we were  
26 interested in a range of experiences, our sample included those young people who had not yet graduated  
27 from or were enrolled in a U.S. high school or the equivalent. While DACA eligibility is open to  
28 minors, this study focuses on young adult DACA recipients. We recruited respondents through national  
and local organizations and through referrals by those who had taken the survey. The extensive  
interview covers several key areas: childhood and early years in the United States; migration history; the  
impact of DACA; household and neighborhood characteristics; social networks; elementary and  
secondary education; post-secondary education; work history and finances; civic engagement; health  
and emotional well-being; interactions with the justice system; and aspirations for the future.

1           25.    Take Miguel<sup>8</sup>, from El Monte, California. Miguel graduated from his high school in  
2   2011, and started taking classes at a local community college. DACA was initiated during Miguel's first  
3   year of college, and provided him a significant financial boost that allowed him to persist in his  
4   schooling. With a work permit, he started working at a print shop and was able to enroll as a full-time  
5   student. Having a driver's license also made life much easier for Miguel. In many parts of California,  
6   one could easily spend two or more hours a day on the bus. After working for a year and establishing  
7   credit, Miguel pooled his money together with his father and they opened up a cell phone store in nearby  
8   La Puente. Just last year, Miguel started a business as a web designer. He credits DACA for providing  
9   opportunities to build a career.

10           26.    DACA recipients not only have increased access to the very resources that are assisting  
11   them to make important educational transitions, they also have a renewed sense of purpose that fueled  
12   educational pursuits. Eighteen-year-old Carolina from Chicago told us, "My freshman and sophomore  
13   year, I did really bad [in school], mostly because I was just not motivated because all of this is going to  
14   be worthless in the end. But then when DACA came out, I started doing a lot better since I was like,  
15   'OK, I actually have a chance.'"

16           27.    Max from New York put it this way, "I finally feel like I am a part of the U.S., like I'm  
17   no longer living in the shadows. I can now work legally. I can now be able to drive legally. When I go  
18   to the doctor's, the clinic, it is being paid for through health insurance that I'm eligible for."

19           28.    And Jenny from Phoenix told us, "I don't know where I would be right now, without  
20   DACA. I don't know if I would be going to school. In some ways, I feel like it saved my life."

21           29.    Perhaps the biggest success of DACA is its positive impact on young people with modest  
22   levels of education, those who may have left school at or before their high school graduation.<sup>9</sup> In terms  
23

24           <sup>8</sup> To protect our research subjects' confidentiality and to avoid deductive disclosure, we use pseudonyms  
25   to conceal real names. This practice is customary in qualitative research with sensitive populations.

26           <sup>9</sup> Roberto G. Gonzales, Marco A. Murillo, Cristina Lacomba, Kristina Brant, Martha C. Franco, Jaemin  
27   Lee, and Deepa S. Vasudevan, *Taking Giant Leaps Forward: Experiences of a Range of DACA*  
28   *Beneficiaries at the 5-Year Mark*, CENTER FOR AMERICAN PROGRESS (2017),  
<https://www.americanprogress.org/issues/immigration/reports/2017/06/22/434822/taking-giant-leaps-forward/>.

1 of distance traveled, DACA's biggest success stories come from moderate achievers. Statistically, most  
2 undocumented immigrant youth end their schooling before entering college.<sup>10</sup> Due to a combination of  
3 scarce family resources, exclusion from financial aid at the state and federal levels, and depressed  
4 motivations stemming from legal limitations, accessing higher education is prohibitive for many  
5 undocumented young people.

6 30. But, for the hundreds of thousands of DACA recipients without high school or college  
7 degrees, DACA has incentivized young people to return to GED or workforce development programs.  
8 It has also provided important onramps to certificate programs in the trades and in health care. These  
9 DACA recipients received training in industries such as medicine, dentistry, construction, cosmetology,  
10 teaching, law, nursing, and insurance. As a result, DACA recipients have used these opportunities as  
11 stepping stones to build careers.

12 31. Before DACA, choices were severely restricted to jobs in low-wage sectors. Despite  
13 length of time in the United States or level of education completed, they were limited to grueling jobs  
14 that did not offer opportunities for job security, safety, or benefits. But the work authorization provided  
15 by DACA and the incentives to invest in education, DACA has enabled its recipients to obtain better  
16 employment. In particular, DACA recipients who completed certificate or licensing programs  
17 experienced significant growth in salary. For many (68 percent), hourly salaries increased from \$5 to \$8  
18 to more than \$14 an hour. Most (76 percent) at least doubled their previous salaries, earning between  
19 \$25,000 and \$30,000 per year.

20 32. Equally impactful is DACA's positive role in improving the mental health of its  
21 recipients. DACA has led to an overall decrease in stress. More than two-thirds of recipients told us  
22 they were less afraid of law enforcement and of being deported. Many report feeling less fear around  
23 government authorities, with new comfort to call on the police when in need. In fact, 59 percent of our  
24 respondents say they would report a crime now, but would not before. With work authorization  
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26 \_\_\_\_\_  
27 <sup>10</sup> In fact, more than 40 percent of unauthorized adults ages 18 to 24 do not complete high school, and  
28 only 49 percent of unauthorized high school graduates go to college. See Jeffrey Passel, D'Vera Cohn,  
*A Portrait of Unauthorized Migrants in the United States* (2009),  
<http://www.pewhispanic.org/files/reports/107.pdf>.

1 documents, DACA recipients are also able to apply for driver's licenses in any state. The ability to  
 2 travel freely and safely to school and work, without always looking over their shoulders, has decreased  
 3 stressful situations.

#### 4 **Ending DACA Would Have Disastrous Effects**

5 33. A repeal of DACA would have disastrous consequences to the young people who have  
 6 enjoyed increased access over these last five years and who would experience a cruel transition back to a  
 7 life of blocked access, daily struggles, and stigma.<sup>11</sup> Over the last five years, they have grown into their  
 8 new status. Access to better employment and increased opportunities for education have allowed them  
 9 to lead lives with more breathing room. They have purchased cars, moved into better living situations,  
 10 and have provided better opportunities for their children. If DACA were to end, these benefits would be  
 11 taken away, and their financial situation would decline significantly. They would be hard pressed to  
 12 keep up with their car payments, they would likely lose their homes, and they would have to make hard  
 13 decisions, including whether or not to pull their children from daycare they can no longer afford.

14 34. DACA recipients would also return to lives of stigma, fear, and worry. Over time, these  
 15 processes have grave consequences not only on individuals' mobility trajectories but also on their minds  
 16 and bodies.<sup>12</sup> They would return to lives on the outside, a fate they would share with many of their  
 17 parents. Their work options would be limited to unstable, dangerous jobs. They would carry out their  
 18 day-to-day lives always looking over their shoulders in fear of being apprehended, detained, and  
 19 deported. And they would likely experience health problems as a result. Everyday lives narrowly  
 20 circumscribed by their undocumented status, would be punctuated by anxiety, fear, limitation, and  
 21 dreams—not only deferred, but also—snatched away from them.

22 35. The loss of access to America's polity as well as to their feelings of belonging could have  
 23 negative consequences on the health and well-being of these young people. This abrupt transition from  
 24 a protected status with important forms of access to an unprotected reality marked by exclusions from  
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26 \_\_\_\_\_  
 27 <sup>11</sup> Roberto G. Gonzales, *Learning to be Illegal: Undocumented Youth and Shifting Legal Contexts in the*  
*Transition to Adulthood*, 76 AMERICAN SOCIOLOGICAL REV. 602-619 (2011).

28 <sup>12</sup> Roberto G. Gonzales, *LIVES IN LIMBO: UNDOCUMENTED AND COMING OF AGE IN AMERICA* (2016).



1 the very mechanisms to ensure their social mobility and well-being is a cruel revocation of their futures  
2 and a very difficult pill to swallow.

3 36. Without DACA, hundreds of thousands of young people who have been leading  
4 productive lives will likely return to the shadows—uninsured, underemployed, and carrying high levels  
5 of stress and anxiety. What’s more, there is a good possibility that many of these young people will be  
6 compelled to leave school. Many will no longer be able to afford postsecondary tuition. And many  
7 more will no longer see incentives for investing in school with uncertain payoffs. These realities,  
8 marked by feelings of loss, are certain to sow uncertainty and disillusionment.

9 37. In addition, a large segment of the DACA eligible population will lack the tools and  
10 experience to navigate clandestine lives. Because of its eligibility criteria, DACA has allowed tens of  
11 thousands of teenagers the opportunity to obtain DACA while in high school and, as a result, reduce the  
12 developmental barriers to adolescent and adult transitions, thus, at least partially, delaying the transition  
13 to illegality. If DACA were to end, these youngsters could be the most vulnerable. Owing to their  
14 access to work authorization and driver’s licenses and reduced fears of deportation, these young people  
15 have experienced normal adolescent transitions. As such, DACA has positively shaped their sense of  
16 belonging and future outlooks. To have everything ripped away from them will likely have dire  
17 consequences.

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

20 Executed on October 25, 2017, at Cambridge, Massachusetts.

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Roberto Gonzales, Ph.D.

**EXHIBIT A**

## **ROBERTO G. GONZALES**

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Cambridge, MA 02138

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[Google Scholar Profile](#)

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### **EDUCATION**

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Ph.D. University of California Irvine, Sociology (2008).

*Fields of Specialization:* Immigration, Unauthorized Migration, Race/Ethnicity,  
Education, Inequality

M.A. University of California, Irvine, Sociology (2004).

A.M. University of Chicago, School of Social Service Administration (1999)

B.A. The Colorado College, Sociology (1992)

Awarded the Abbot Prize for outstanding student in Sociology Department

### **ACADEMIC APPOINTMENTS**

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Professor of Education, Harvard Graduate School of Education (2017-)

Assistant Professor, Harvard Graduate School of Education (2013 to 2017)

Assistant Professor, University of Chicago School of Social Service Administration (2011-2013)

Adjunct Assistant Professor, University of Washington, Department of Sociology (2011-2016)

Assistant Professor, University of Washington, School of Social Work (2009 to 2011)

Acting Assistant Professor, University of Washington School of Social Work (2008-2009)

### **ACADEMIC AFFILIATIONS**

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Faculty Research Affiliate, Institute for Research on Poverty, University of Wisconsin-Madison (2016-Present)

Faculty Research Affiliate, University of Oxford, Department of Social Policy and Intervention (2015)

Faculty Research Affiliate, Chapin Hall Center for Children, University of Chicago (2011-2014)

10.2.2017

Faculty Research Affiliate, Center for the Study of Race, Politics & Culture, University of Chicago (2011-2013)

Faculty Research Affiliate, Center for Human Potential and Public Policy, University of Chicago (2011-2013)

Faculty Research Affiliate, West Coast Poverty Center, University of Washington (2009-2011)

## **HONORS AND AWARDS**

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Winner (2017), Society for the Study of Social Problems C. Wright Mills Book Award.

Winner (2017), American Sociological Association Sociology of Education Section, Pierre Bourdieu Book Award.

Winner (2017), Law and Society Association Herbert Jacob Book Award.

Winner (2017), American Education Research Association Outstanding Book Award.

Honorable Mention (2017), American Sociological Association International Migration Section, Thomas and Znaniecki Distinguished Book Award.

Honorable Mention (2017), American Sociological Association Aging and the Life Course Section, Outstanding Publication Award.

Honorary Degree Recipient (2017), Colorado College.

Ranked [#1 among Junior Faculty](#) in Rick Hess's 2017 Edu-Scholar Public Influence Rankings.

Winner (20016), American Anthropological Association ALLA Book Award.

Early Career Award (2016), American Educational Research Association Committee on Scholars of Color in Education. Given annually by the Association to a scholar who is within the first decade of his or her career after receipt of a doctoral degree.

Early Career Award (2016), American Educational Research Association Hispanic Research Issues Special Interest Group.

Public Sociology Award (2014), American Sociological Association, International Migration Section.

Distinguished Contribution to Research, Best Article Award (2013), American Sociological Association, Latino/a Sociology Section.

Distinguished Contribution to Research, Honorable Mention, Best Article (2013), American Sociological Association, International Migration Section.

Lauds and Laurels Outstanding Graduate Student (2008), University of California Irvine. Each year the UC Irvine Alumni Association presents this award to recognize a graduate student who has excelled academically and has impacted the campus or community at-large through significant service or program creation.

Order of Merit (2008), UC Irvine School of Social Sciences.

Fellow (2007-2008), Public Policy Institute of California.

Ford Dissertation Fellow (2006-2007), National Academy of Sciences.

Outstanding Graduate Student Instructor (2006), UC Irvine Department of Sociology.

Faculty Mentor Fellowship (2003-2004), UC Irvine.

Abbot Scholar (1996-1999), University of Chicago.

## **RESEARCH GRANTS**

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William T. Grant Foundation Research Grant (2017-2018), "Putting Immigration and Education in Conversation Everyday." Co-PI with Rebecca Lowenhaupt, Dafney Blanca Dabach, and Ariana Figueroa, \$50,000.

Spencer Foundation Research Grant (2017-2018), "Putting Immigration and Education in Conversation Everyday." Co-PI with Rebecca Lowenhaupt, Dafney Blanca Dabach, and Ariana Figueroa, \$35,000.

John D. and Catherine T. MacArthur Foundation Research Grant (2016-2017), "From Undocumented to DACAmented and Potentially DAPAmented: Understanding Mixed-Status Families in a New Policy Context," \$100,000.

Heising-Simons Foundation Research Grant (2016-2018), "Putting Immigration and Education in Conversation Every day," \$270,000.

Russell Sage Foundation Research Grant (2015-2016), "Undocumented Immigration: Effects of Policy on the Experience of Illegality," \$35,000.

Bill and Melinda Gates Foundation Research Grant (2014-2016), "Going Back to School? Understanding the Effects of Widened Access for Undocumented Young Adults," \$250,000.

John D. and Catherine T. MacArthur Foundation Research Grant (2013-2016), "Learning to be Legal: A Proposal to Track the Impact of Deferred Action on DREAM Act Eligible Youth and Young Adults," \$600,000.

James B. Irvine Foundation Research Grant (2013-2014), “Assessing DACA Implementation in California,” \$125,000.

Heising-Simons Foundation Research Grant (2013-2014), “Understanding the Effects of Widened Access Among Undocumented Young Adults,” with Veronica Terriquez, Co-PI, \$40,000.

U.S. Department of Health and Human Services Grant, administered under the Stanford Center for the Study of Poverty and Inequality (2012-2013), ‘Hispanic Poverty: Social Mobility.’ (Douglass S. Massey and David Grusky, Co-PI’s).

William T. Grant Scholars Program (Finalist, 2013) “Assessing Critical Supports for the Educational Persistence of the Children of Suburban Latino Immigrants.”

University of California, Davis Poverty Center Small Grant (2012), “Suburban Poverty and Immigrant Integration,” \$19,800.

University of Washington Institute for Ethnic Studies in the United States Small Grant (2010), “The Undocumented 1.5 Generation in Seattle,” \$10,205.

University of Washington West Coast Poverty Center Small Grant for Early Scholars (2009), “The Uncertain Futures of the Children of Undocumented Immigrants,” \$9,000.

University of Michigan National Poverty Center Small Grant (2009), Young Lives on Hold: Undocumented 1.5 Generation Young Adults Learning to be “Illegal,” \$8,228.

UC Irvine Center for Latinos in a Global Society Research Grant (2004-2007), \$30,000.

UC MEXUS Dissertation Research Grant, (2006), “The Children of Post-Industrial America: How the Sons and Daughters of Unauthorized Migrants Make Ends Meet,” \$12,000.

## **PUBLICATIONS** (*Names in italics indicate graduate students*)

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### **Books**

**Gonzales, Roberto G.** 2016. *Lives in Limbo: Undocumented and Coming of Age in America*. Oakland: University of California Press.

- Winner (2017), Society for the Study of Social Problems C. Wright Mills Book Award.
- Winner (2017) Law and Society Association Herbert Jacob Book Award.
- Winner (2017) American Education Research Association Outstanding Book Award.
- Winner (2017), American Sociological Association Sociology of Education Section, Pierre Bourdieu Book Award.
- Honorable Mention (2017), American Sociological Association International Migration Section, Thomas and Znaniecki Distinguished Book Award.
- Honorable Mention (2017), American Sociological Association Aging and the Life Course Section, Outstanding Publication Award.
- Winner (2016) American Anthropological Association ALLA Book Award.

- Chosen for Author Meets Critic Session, Eastern Sociological Society, Boston, 2016.
- Reviewed in *The New York Review of Books*, *International Migration Review*, *Sociological Forum*, *City and Society*, *Migration Studies*, *NACLA Report on the Americas*, *Journal of Children and Poverty*; *Chiricú Journal: Latina/o Literatures, Arts, and Cultures*
- Selected by Tufts University as its Freshman Class's Common Book for AY 2017-2018

**Gonzales, Roberto G.**, and Nando Sigona (Spring, 2017). *Within and Beyond Citizenship: Borders, Membership and Belonging*. New York: Routledge.

**Gonzales, Roberto G.**, and Nando Sigona (Spring, 2018). *Undocumented Migration*. Under Contract. Cambridge: Polity Press.

**Gonzales, Roberto G.**, Benjamin Roth, and Kristina Brant (Spring 2019) *The Growing Significance of Place: Assessing the Diverging Trajectories of DACA-eligible Young Adults*. Under Contract, Oakland: University of California Press.

### Special Issues

**Gonzales, Roberto G.**, and Steven Raphael. 2017. *Russell Sage Foundation Journal*, Special Issue on "Undocumented Immigrants and their Experiences of Illegality, Volume 3 No. 4.

**Gonzales, Roberto G.**, Nando Sigona, and Edolina Burciaga. 2016. *American Behavioral Scientist*, Special issue on "Citizenship, Rights, and Deservingness, Volume 60 No. 13.

Aranda, Elizabeth, Elizabeth Vaquera, and **Roberto G. Gonzales**. 2014. *American Behavioral Scientist* Special Issue on "Latino Incorporation in Old and New Immigrant Destinations," 2014, Volume 58 No. 14.

### Peer-Reviewed Journal Articles

Zhou, Min, and **Roberto G. Gonzales**. Forthcoming. "Divergent Destinies: Children of Immigrants Growing Up in America. *American Review of Sociology*, Issue 45.

**Gonzales, Roberto G.** and Edolina Burciaga. Forthcoming. "Segmented Pathways of Illegality: Reconciling the Co-existence of Master and Auxiliary Statuses in the Experiences of 1.5 Generation Undocumented Young Adults." *Ethnicities*.

Yoshikawa, Hirokazu, Carola S. Suarez-Orozco, and **Roberto G. Gonzales**. 2017. "Unauthorized Status and Youth Development in the United States: Consensus Statement of the Society for Research in Adolescence." *Journal of Research on Adolescence*. Volume 27, Issue 1, 4-19.

**Gonzales, Roberto G.**, and Steven Raphael. 2017. "Illegality: A Contemporary Portrait." *Russell Sage Foundation Journal*, Volume 3 No 4.

Trieu, Monica, *Nicholas Vargas*, and **Roberto G. Gonzales**. 2016. "Transnational Patterns among Asian American and Latina/o American Children of Immigrants from Southern California." *Journal of Ethnic and Migration Studies*, Volume 42, Issue 7, 1177-1198.

**Gonzales, Roberto G.**, Luisa L. Heredia, and Genevieve Negron-Gonzales. 2015. "Untangling Plyler's Legacy: Undocumented Students, Schools, and Citizenship." *Harvard Educational Review*, Volume 85 No. 3, 318-341.

**Gonzales, Roberto G.** 2015. "Imagined Futures: Thoughts on the State of Policy and Research Concerning Undocumented Immigrant Youth and Young Adults." *Harvard Educational Review*, Volume 85 No. 3, 518-524.

*Roth, Benjamin J.*, **Roberto G. Gonzales**, and *Jacob Lesniewski*. 2015. "Building a Stronger Safety Net: Local Organizations and the Challenges of Serving Immigrants in the Suburbs." *Human Service Organizations: Management, Leadership, & Governance*, Volume 39, No. 4 348-361.

*Patler, Caitlin* and **Roberto G. Gonzales**. 2015. "Framing Citizenship: Media Coverage of Anti-Deportation Cases Led by Undocumented Immigrant Youth Organizations." *Journal of Ethnic and Migration Studies*, Volume 41, No. 9, 1453-1474.

**Gonzales, Roberto G.**, Veronica Terriquez, and *Stephen. Ruszczyk*. 2014. "Becoming DACAmented: Assessing the Short-term Benefits of Deferred Action for Childhood Arrivals (DACA)." *American Behavioral Scientist*, Volume 58, No. 14, 1852-1872.

Vaquera, Elizabeth, Elizabeth Aranda, and **Roberto G. Gonzales**. 2014. Patterns of Incorporation of Latinos in Old and New Destinations: From Invisible to Hypervisible." *American Behavioral Scientist*, Volume 58, No. 14, 1823-1833.

**Gonzales, Roberto G.**, and *Ariel Ruiz*. 2014. "Dreaming Beyond the Fields: Undocumented Youth, Rural Realities, and a Constellation of Disadvantage." *Latino Studies*, Volume 12 Issue 2, 194-216.

**Gonzales, Roberto G.**, Carola Suárez-Orozco, and *Maria Cecilia Dedios*. 2013. "No Place to Belong: Contextualizing Concepts of Mental Health among Undocumented Immigrant Youth in the United States." *American Behavioral Scientist*, Volume 57 Issue 8, 1173 - 1198.

Gleeson, Shannon, and **Roberto G. Gonzales**. 2012. "When Do Papers Matter? An Institutional Analysis of Undocumented Life in the United States." *International Migration*, Vol. 50, Issue 4, 1-19.

- Lead Article
- Reprinted in *The New Latino Studies Reader: A Twenty-First-Century Perspective*, Gutierrez and Almaguer, Eds. 2016. University of California Press.

**Gonzales Roberto G.**, and Leo R. Chavez. 2012. "Awakening to a Nightmare": Abjectivity and Illegality in the Lives of Undocumented 1.5 Generation Latino Immigrants in the United States." *Current Anthropology* 53(3).

- Lead Article



**Gonzales, Roberto G.** 2011. "Learning to be Illegal: Undocumented Youth and Shifting Legal Contexts in the Transition to Adulthood." *American Sociological Review*, Volume 76, Number 4, 602-619.

- Featured Article
- Distinguished Contribution to Research, Best Article Award, American Sociological Association, Latino/a Sociology Section, 2013.
- Distinguished Contribution to Research, Honorable Mention, Best Article, American Sociological Association, International Migration Section, 2013.
- Reprinted in *The Structure of Schooling: Readings in the Sociology of Education*, 2015, Arum, Beattie, and Ford, Eds.

**Gonzales, Roberto G.** 2010. "On the Wrong Side of the Tracks: Understanding the Effects of School Structure and Social Capital in the Educational Pursuits of Undocumented Immigrant Students." *Peabody Journal of Education*, Volume 85 Issue 4, 469-485.

Abrego, Leisy J. and **Roberto G. Gonzales.** 2010. "Blocked Paths, Uncertain Futures: The Postsecondary Education and Labor Market Prospects of Undocumented Youth." *Journal of Education for Students Placed at Risk*, 15: 1, 144 — 157.

**Gonzales, Roberto G.** 2010. "More Than Just Access: Undocumented Students Navigating the Post-Secondary Terrain." *Journal of College Admissions*, Number 206.

**Gonzales, Roberto G.** 2009. "On the Rights of Undocumented Children." *Society*. Volume 46 Number 5, 419 – 422.

**Gonzales, Roberto G.** 2008. "Left Out but not Shut Down: Political Activism and the Undocumented Latino Student Movement." *Northwestern Journal of Law and Social Policy*. Volume 3:2, 219-239.

- Reprinted in *Governing Immigration through Crime: A Reader*, Dowling and Inda, Eds. 2013. Stanford University Press.

### **Peer Reviewed Book Chapters**

**Gonzales, Roberto G.** and *Edelina M. Burciaga.* Forthcoming. "Undocumented Youth and Local Contours of Inequality." In *Handbook of the Sociology of Education in the 21<sup>st</sup> Century*, Barbara Schneider and Guan Saw, Editors. New York: Springer International Publishing.

**Gonzales, Roberto G.** In Press. "Sergio Rodriguez's Dream Deferred: Illegality, Deportation, and the Long Term Impacts of Lives in Limbo." *Forced Out and Fenced In: Immigration Tales From the Field*, Tanya Golash-Boza, Editor. New York: Oxford University Press.

**Gonzales, Roberto G., Joanna Perez,** and *Ariel Ruiz.* 2016. "Ni de aqui, ni de alla": Undocumented Immigrant Youth and the Challenges of Identity Formation amid Conflicting Contexts." In *Bilateral Perspectives on Mexican Migration: Demographic, Economic and Incorporation Trends*, Harriett Romo and Olivia Lopez, Editors. Austin: University of Texas Press.

Stein, Gabriela, **Roberto G. Gonzales**, Cynthia Garcia Coll, and Juan I. Prandoni. 2015. “Latinos in Rural, New Immigrant Destinations: A Modification of the Integrative Model of Child Development.” In *Rural Ethnic Minority Youth and Families in the United States*, Crockett and Carlo, Eds. Springer International Publishing.

**Gonzales, Roberto G.**, and Benjamin Roth. 2015. “Immigrant Children and the Transition to Adulthood.” In Scott, R. & Kosslyn, S. Eds. *Emerging Trends in the Social and Behavioral Sciences*. SAGE Publications.

**Gonzales, Roberto G.**, and Cynthia N. Carvajal. 2015. “Difficult Transitions: Undocumented Immigrant Students Navigating Vulnerability and School Structures.” In *Inequality, Power and School Success: Case Studies on Racial Disparity and Opportunity in Education*, Gilberto Conchas and Michael Gottfried, Editors. New York: Routledge.

**Gonzales, Roberto G.**, Luisa Heridia, and Genevieve Negrón –Gonzales 2013.. “Challenging the Transition to New ‘Illegalities’: Undocumented Young Adults and the Shifting Boundaries of Inclusion.” In *Immigrant Illegality: Constructions, Critiques and Resistance*, Cecilia Menjivar and Daniel Kanstroom, Editors. Cambridge: Cambridge University Press.

**Gonzales, Roberto G.** 2013 “Reassessing Human Capital and Intergenerational Mobility.” In *Poverty, Inequality, and Immigration*, David Card and Steven Raphael, Editors. New York: Russell Sage.

**Gonzales, Roberto G.**, and Rennie Lee. 2013. “Second generation, identity formation.” *The Encyclopedia of Global Migration*. Malden, MA: Wiley.

**Gonzales, Roberto G.** 2011. “In Spite of the Odds: Undocumented Immigrant Youth, School Networks, and College Success.” In *Is Becoming an American a Developmental Risk?*, Cynthia García Coll and Amy Marks, Editors. Washington DC: APA Books.

**Gonzales, Roberto G.** 2009. “*Dirty Pretty Things*: The State, Global Migration and Survival in Contemporary Cities,” in *Cinematic Sociology: Social Life in Film*, Feltey, K. and J. Sutherland eds. London, U.K.: Sage Press.

Rumbaut, Rubén G., **Roberto G. Gonzales**, Golnaz Komaie, and Charlie V. Morgan. 2008. “Inmigración, encarcelamiento y delincuencia en los Estados Unidos de América: La percepción pública frente a la evidencia empírica,” in *Procesos de infracción de normas y de reacción a la infracción de normas: dos tradiciones criminológicas. Nuevos estudios en homenaje al profesor Alfonso Serrano Gómez*. Alfonso Serrano Maíllo y José Luis Guzmán Dálbora, editores. Madrid: Editorial Dykinson.

Rumbaut, Rubén G., **Roberto G. Gonzales**, Golnaz Komaie, and Charlie V. Morgan and Rosaura Tafoya-Estrada. 2006. “Immigration and Incarceration: Patterns and Predictors of Imprisonment among First – and Second-Generation Young Adults,” in *Immigration and Crime: Ethnicity, Race, and Violence*, Martinez, R. and A. Valenzuela eds. New York University Press.

### **Policy Reports**

**Gonzales, Roberto G.**, Marco A. Murillo, Cristina Lacomba, Kristina Brant, Martha C. Franco, Jaein Lee, and Deepa S. Vasudevan. 2017. “Taking Giant Leaps Forward: Experiences of a Range of DACA Beneficiaries at the 5-Year Mark.” Center for American Progress. Available at: <https://www.americanprogress.org/issues/immigration/reports/2017/06/22/434822/taking-giant-leaps-forward/>

**Gonzales, Roberto G.**, Maria E. Luna-Duarte, Daysi X. Diaz-Strong, M. Ireva Rivas, and Kristina Brant. 2016 “How Will I Pay for It? Undocumented Students and the Barriers to College Affordability.” Latino Policy Forum. Available at: <http://www.latinopolicyforum.org/blog/nurp-financial-accessibility#>

**Gonzales, Roberto G.**, Benjamin Roth, Kristina Brant, Jaein Lee, and Carolina Valdivia. 2016. “DACA at Year Three: Challenges and Opportunities in Assessing Education and Employment, New Evidence from the UnDACAmented Research Project.” American Immigration Council: February, 2016. Available at: [http://immigrationpolicy.org/sites/default/files/docs/daca\\_at\\_year\\_three.pdf](http://immigrationpolicy.org/sites/default/files/docs/daca_at_year_three.pdf)

**Gonzales, Roberto G.**, and Angie Bautista-Chavez. 2014. “Two Years and Counting: Assessing the Growing Power of DACA.” Immigration Policy Center, June 2014. Available at: <http://www.immigrationpolicy.org/special-reports/two-years-and-counting-assessing-growing-power-daca>

Cervantes, Wendy, and **Roberto G. Gonzales**. 2013. “The Cost of Inaction: Why Children Can’t Wait for Immigration Reform.” First Focus: Center for the Children of Immigrants, October 2013.

**Gonzales, Roberto G.**, and Veronica Terriquez. 2013. “How DACA is Impacting the Lives of Those Now DACAmented: Preliminary Findings from the National UnDACAmented Research Project.” Immigration Policy Center and the Center for the Study of Immigrant Integration, August, 2013. Available at: <http://www.immigrationpoliPreliminary Findings from the National UnDACAmented Research Projectcy.org/just-facts/how-daca-impacting-lives-those-who-are-now-dacamended>

**Gonzales, Roberto G.** 2011. “Where Do We Go From Here? Undocumented Youth and an Effort Requiring the Entire Village.” UC Berkeley Center for Latino Policy Research. Available at: <http://escholarship.org/uc/item/1k51m25n;jsessionid=BDBD64FF6A2F9C48D5A4B8DDE41B391C>

**Gonzales, Roberto G.** 2009. “Young Lives on Hold: The College Dreams of Undocumented Students” (with a foreword by Marcelo Suárez-Orozco). *The College Board*. Available at: <http://professionals.collegeboard.com/profdownload/young-lives-on-hold-college-board.pdf>

- Reprinted in Spanish. 2009. “Vidas Jóvenes en Espera: Los Sueños Universitarios de Estudiantes Indocumentados” (Prólogo de Marcelo M. Suárez-Orozco). *The College Board*. Available at:

<http://professionals.collegeboard.com/profdownload/young-lives-on-hold-college-board-spanish.pdf>

**Gonzales, Roberto G. 2009.** “Why Integration Matters: Undocumented Immigrant Youth and Making a Case for Moving Beyond Enforcement.” *The Role of Local Police: Striking A Balance Between Immigration Enforcement and Civil Liberties*, The Police Foundation.

**Gonzales, Roberto G. 2007.** “Wasted Talent and Broken Dreams: the Lost Potential of Undocumented Students.” *Immigration Policy: In Focus*. Volume 5, Issue 13. Immigration Policy Center, of the American Immigration Law Foundation. Washington, D.C. Fall 2007.

Available at:

<http://www.immigrationpolicy.org/sites/default/files/docs/Wasted%20Talent%20and%20Broken%20Dreams.pdf>

- Reprinted in *Current Controversies: Illegal Immigration*, 2012. Noel Merino, Editor. Greenhaven Press.

Rubén G. Rumbaut, **Roberto G. Gonzales**, Golnaz Komaie, and Charlie V. Morgan. 2006. “Debunking the Myth of Immigrant Criminality: Imprisonment Among First- and Second-Generation Young Men,” in *Migration Information Source*, June 1, 2006 (with Rubén G. Rumbaut, Golnaz Komai, and Charlie V. Morgan). Available at:

<http://www.migrationinformation.org/usfocus/display.cfm?ID=403>

### **Book Reviews**

**Gonzales, Roberto G.** Forthcoming. Review of *Dreams and Nightmares: Immigration Policy, Youth, and Families*, Marjorie Zatz and Nancy Rodriguez. *Contemporary Sociology*.

**Gonzales, Roberto G.** 2016. Review of *Skills of the Unskilled: Work and Mobility Among Mexican Migrants*, Jacqueline M. Hagan, Ruben Hernandez-Leon, and Jen-Luc Demonsant. *American Journal of Sociology*, 121 (6): 1947-1949.

**Gonzales, Roberto G.** 2013. Review of *Rallying for Immigrant Rights: The Fight for Inclusion in 21<sup>st</sup> Century America*, Kim Voss and Irene Bloemraad, Eds. *Contemporary Sociology* 42 (5): 755-756.

**Gonzales, Roberto G.** 2012. Review of *Immigrants Raising Citizens: Undocumented Parents and Their Young Children*, by Hirokazu Yoshikawa. *Social Service Review*, 86 (3): 547-548.

**Gonzales, Roberto G.** 2010. Review of *Manifest Destines: The Making of the Mexican American Race*, by Laura E. Gomez. *Contemporary Sociology*, 39 (1): 38.

**Gonzales, Roberto G.** 2006. Review of *Chicanas and Chicanos in School: Racial Profiling, Identity Battles, and Empowerment*, by Marcos Pizarro. *Latino Studies* 2006, Volume 4 Issue 3 Autumn 2006.

### **Op-Eds**

**Gonzales, Roberto G.** “I study young immigrants. Here’s how DACA changed their lives” *Vox: The Big Idea*, September 2, 2017. <https://www.vox.com/2017/9/2/16244380/daca-benefits-trump-undocumented-immigrants-jobs>

**Gonzales, Roberto G.**, and Kristina Brant. “DACA Boosts Young Immigrants’ Well-Being, Mental Health,” *NBC News*, June 15, 2017. <https://www.nbcnews.com/news/latino/analysis-daca-boosts-young-immigrants-well-being-mental-health-n772431>

**Gonzales, Roberto G.** “Community Support Can Help Integrate Immigrants,” *The New York Times, Room for Debate*, September 12, 2016.

**Gonzales, Roberto G.** “How the Supreme Court’s immigration decision hurts all of us,” *The Washington Post*, June 23, 2016.

**Gonzales, Roberto G.** “Supreme Court ruling could put immigrants deeper into shadows,” *The Boston Globe*, June 23, 2016.

**Gonzales, Roberto G.** 2012. “Five Myths about the Dream Generation,” *Washington Post*, June 22, 2012.

**Gonzales, Roberto G.** 2010. “We Cannot Afford to Not Pass the DREAM Act: A Plea from Immigration Scholars.” *Huffington Post*, December 8, 2010. Lead author accompanied by 381 of the nation’s top scholars. Available at: [http://www.huffingtonpost.com/roberto-g-gonzales/we-can-not-afford-not-to-1\\_b\\_793702.html](http://www.huffingtonpost.com/roberto-g-gonzales/we-can-not-afford-not-to-1_b_793702.html)

**Gonzales, Roberto G.** 2010. “Investing in the American Dream: The DREAM Act Would Allow Undocumented Youth to Give Back to America.” The Immigration Policy Center. Available at: [http://immigrationpolicy.org/sites/default/files/docs/Gonzales\\_Investing\\_in\\_the\\_American\\_DREAM\\_120210.pdf](http://immigrationpolicy.org/sites/default/files/docs/Gonzales_Investing_in_the_American_DREAM_120210.pdf)

**Gonzales, Roberto G.** 2009. Perspectives Piece on the DREAM Act and Comprehensive Reform for the Illinois Coalition for Immigrant and Refugee Rights. Available at: <http://icirr.org/ko/node/4206>

### **Selected Works in Progress**

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“Immigration Policy and Mental Health Outcomes among Undocumented Latino Young Adults: An Elaboration of the Stress Process Model,” with Veronica Terriquez and Juanita Garcia. Preparing for *Journal of Health and Social Behavior*.

“The Impact of DACA on the Life Course,” with Basia Ellis and *Sarah Rendon-Garcia*. Preparing for submission to *Child Development*.

“Imagined Futures: The Effects of Uncertainty on DACAmented Youth in the United States,” with Cristina Fernandez-Gutierrez and *Carolina Valdivia*. Preparing for submission to the *American Journal of Sociology*.

“On the Path to College: Undocumented Students Disclosing their Immigration Status to School Personnel,” with *Carolina Valdivia*. Preparing for submission to the *Sociology of Education*.

"Power and Political Opportunity in the Lives of Young Undocumented Immigrants: Complicating Established Frameworks, Constructing New Theory," with *David Knight*. Preparing for submission to *Perspectives on Politics*.”

“The Contours of Concealment and Disclosure: An Analysis of Undocumented Youth’s Disclosures in School Settings,” with Dafney Blanca Dabach and *Deepa Vasudevan*. In Progress.

“Undocumented Youth’s Disclosure Patterns across Contrasting State Contexts: Implications for Policy and Practice, with Dafney Blanca Dabach and *Deepa Vasudevan*. In Progress.

“The Power of Inclusion: How DACA Transforms the Psychological Lives of Undocumented Youth,” with Basia Ellis and *Sarah Rendon-Garcia*. In Progress.

“What Counts as Well-being for Undocumented Youth?” with Basia Ellis and *Sarah Rendon-Garcia*. In Progress.

“Because My Dad Helped Me”: Assessment of Family Engagement in the DACA Application Process,” with *Jaemin Lee*. In Progress

"Documenting the Undocumented: Methodological and Ethical Strategies," with *Thomas Swerts*. Preparing for submission to *Qualitative Methods*.

## **PRESENTATIONS**

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### **Keynote Addresses and Select Invited Presentations**

Future of Latinos in the United States: Law Opportunity, and Mobility, Northeast Roundtable, Yale Law School, April 8-9, 2017.

Children of Immigrants in New Places of Settlement, The American Academy of Arts and Sciences, April 19-21, 2017.

Keynote Speaker, Global Politics of Migration and Refuge Symposium, Grinnell College, September 8, 2016.

Keynote Speaker, Undocumented and Coming of Age: What lessons can Europe draw from the USA? European Parliament, Sponsored by MEP Brando Benifei and the European Parliament Youth Intergroup, March 16, 2016.

Carl A. Grant Lecture, University of Wisconsin-Madison Center for Educational Research, May 6, 2016.

Keynote Speaker, Illinois African American and Latino Higher Education Alliance Research Forum, University of Illinois at Chicago, April 6, 2016.

George I. Sanchez, Lecture, University of Houston Institute for Higher Education Law and Governance, March 29, 2016.

Keynote Speaker, University of Chicago Latino Student Association Annual Conference, April 17, 2015.

National Academy of Sciences, Committee on Population, Panel on Integrating Immigrants into America, July 17, 2014.

Keynote Speaker, Serving Mexican Population's Educational Needs: Lessons from Coast to Coast, City University New York, December 5, 2014.

Annual Daniel Patrick O'Connor Memorial Lecture, Colorado College, December 11, 2013.

Keynote Speaker, César E. Chávez Undergraduate Research Symposium, Indiana University, March 21, 2013.

Keynote Speaker, 50 Years Later: (R)Evolution of the Dream, University of Michigan, February 5, 2013.

Keynote Speaker, Latino Heritage Month, Illinois State University, October 4, 2012.

Keynote Speaker, Social Services in the Latino/a Community Conference, UCLA Luskin School of Public Affairs, May 7, 2011.

### **Presentations at Professional Associations and Meetings**

“Between Peril and Possibility: DACAmented Youth Views of American Democracy.” Society for the Study of Social Problems Annual Meeting, Seattle, WA, August, 2016.

“From Undocumented to DACAmented: Understanding Legal Status in a New Policy Context.” American Education Research Association Annual Meeting, Washington, D.C., March, 2016.

“Between Peril and Possibility: DACAmented Youth Views of American Democracy.” Eastern Sociological Society, Boston, MA, February, 2016.

“Taking Small Steps Forward: Assessing Short-term Benefits of DACA from the National Undocumented Research Project.” American Sociological Association Annual Meeting, San Francisco, CA, August, 2014.

“Are Small Steps Forward Enough? Assessing the Benefits of Deferred Action for Childhood Arrivals from the National Undocumented Research Project.” Presidential Panel, American Educational Research Association Annual Meeting, Philadelphia, PA, 2014.

“Invisible Work and the Undocumented, A Conversation with Roberto Gonzales and Robert Smith.” Eastern Sociological Society Annual Meeting, Baltimore, MD, February, 2014.

“Immigration, Schooling, and the Transition to Illegality.” Eastern Sociological Society Annual Meeting, Boston, MA, March, 2013.

“Education Not Deportation! Undocumented Students & the Reframing of the Debate about Immigrant Rights.” Law and Society Annual Meeting, Honolulu, HI, May, 2012.

“Dreams in a Time of Confusion: Undocumented Youth and the Four Shocks of Discovery.” American Anthropological Association Annual Meeting, Montreal, November 21, 2011.

“Waking up to a Nightmare.” Law and Society Annual Meeting, San Francisco, June 2011.

“Making Connections, Building a Movement: Undocumented Students Organizing Online.” Thematic Session, American Sociological Association Annual Meeting, Atlanta, GA, Aug. 2010.

“Wasted Talent and Hard Work: An Evaluation of Framing in the Immigrant Rights Movement” Law and Society Association Annual Meeting, Chicago, May 2010, with Shannon Gleeson (UC Santa Cruz)

“Citizenship, Abjectivity, and Illegality: The end(s) of Identity.” 2009 Presidential Panel on "Dilemmas of Citizenship," the annual meetings of the AAA, December 2009, Philadelphia, Pennsylvania, with Leo Chavez (UC Irvine).

(Presider and Discussant) “Emerging Issues in Social Work Research and Practice with Immigrant Communities.” Council on Social Work Education, San Antonio, TX, November 2009.

“Transitioning to Work and Uncertainty.” American Sociological Association Annual Meeting, San Francisco, CA, Aug. 2009.

“Membership, Opportunity, and Claims Making: Undocumented Immigrants Negotiating Bureaucracies.” Law and Society Association Annual Meeting, Denver, CO, May 2009, with Shannon Gleeson (UCSC)

“Learning to be Illegal: Undocumented Mexican Youth Coming of Age at a Crossroads” Presidential Session: *Mexican Immigration: Current Issues & Controversies*, Pacific Sociological Association Annual Meeting, San Diego, CA April 2009.

“Dreams Deferred: Immigration and the Construction of Liminal Americans.” University of Texas at Austin, American Studies Conference. Austin, TX. September 2007.



(Presider) Immigrant Networks Roundtables, American Sociological Association Annual Meeting, New York, New York, August 2007.

(Presider and Discussant) “The Future of Ethnic Identity: Case Studies of 1.5- & Second-Generation Young Adults in Southern California,” panel at the Pacific Sociological Association’s Annual Conference, Oakland, CA. March 2007.

(Organizer) “Waking the Sleeping Giant? Organizing & the Immigrants Rights Movement,” panel at the Pacific Sociological Association’s Annual Conference, Oakland, CA. March 2007.

“Growing up on the margins: The children of Mexican unauthorized migrants.” Pacific Sociological Association Annual Meeting, Hollywood, CA, April 2006.

### **Policy Briefings**

Center for American Progress, Harnessing the Talent of Unauthorized and DACA Students: What’s Working in K-12 Policy and Practice, with Frances Esparza, Assistant Superintendent, Boston Public Schools; Richard Loeschner, Principal, Brentwood High School, Brentwood, New York; and Yehemi Cambron, Georgia Public School Teachers, March, 2016.

Center for American Progress, DACA Turns 1: Lessons and Challenges on the Anniversary of the Deferred Action for Childhood Arrivals Directive, with Tom Wong (UC San Diego), Audrey Singer (Brookings Institute), and Erika Andiola (Rep. Krysten Sinema D-AZ), August, 2013.

The Immigration Policy Center, A Roadmap to Citizenship for the 11 million Undocumented Immigrants in the U.S., with Rob Paral (Rob Paral and Associates) and Sherri Kassoudji (University of Michigan), January, 2013.

Center for American Progress, Legal Violence: How Immigration Enforcement Affects Families, Schools, and Workplaces, with Leisy Abrego (UCLA), Cecilia Menjivar (ASU), Lisa Moore (National Domestic Workers Alliance), and Chris Newman (National Day Laborer Organizing Network), December, 2012.

Reform Immigration for America, National Education Leaders Discuss the DREAM Act, with Becky Pringle (Secretary Treasurer, National Education Association); Antonia Cortese (Secretary-Treasurer, American Federation of Teachers); Gary Rhoades (Secretary General, American Association of University Professors); and Junot Diaz (Pulitzer Prize winning writer and Professor, Massachusetts Institute of Technology), December, 2010.

The Immigration Policy Center, Noted American Scholars Discuss the DREAM Act, with Douglas S. Massey (Princeton University), Carola Suarez-Orozco (New York University), Rubén G. Rumbaut (UC Irvine), and Jacqueline Hagan (University of North Carolina at Chapel Hill), December, 2010.

The University of Washington, Pursuing the Dream: Beyond Achieving Education, with Hon. Maria Cantwell (U.S. Senator, D-WA); Rep. Phyllis Gutierrez-Kenney (46<sup>th</sup> District, Washington), August, 2009.

The College Board, *Young Lives on Hold: The College DREAMS of Undocumented Students*. Washington DC: Capitol Briefing, with Hon. Robert Menendez (U.S. Senator, D-New Jersey); Joseph Zogby (Chief Counsel to Senator Richard Durbin, D-IL); James M. Montoya (Vice President, The College Board); Hemi Kim (D.C. Director, National Korean American Service & Education Consortium); Gumecindo Salas (Vice President, Government Relations, Hispanic Association for Colleges and Universities, April, 2009.

“Why Integration Matters: Making a Case for Moving Beyond Enforcement.” The Police Foundation, Conference on the Role of Local Police: Striking a Balance between Immigration Enforcement and Civil Liberties. Washington DC, August 2008.

American Immigration Law Council. Policy and Politics: Senator Durbin and Education Experts Discuss the DREAM Act. Washington DC. Presented research on panel with Hon. Richard Durbin (U.S. Senator, D-IL); Robert J. Birgeneau, (Chancellor, University of California at Berkeley); Reg Weaver (President, National Education Association); Gov. Bob Wise (President, Alliance for Excellent Education and former governor of West Virginia), October, 2007.

The Chief Justice Earl Warren Institute on Race, Ethnicity and Diversity, UC Berkeley, Boalt Hall School of Law. *The Education of Our Children: The 25<sup>th</sup> Anniversary of Plyler V. Doe*, May, 2007.

## **TEACHING**

---

Harvard Graduate School of Education (2013 to Present)

- Contemporary Immigration Policy and Educational Practice
- Ethnographic Methods

University of Chicago School of Social Service Administration (2011 to 2013)

- Contemporary Immigration Policy and Practice
- Cultural and Political Understandings of Youth

University of Washington (2008-2011)

- Critical Youth Empowerment
- Maco-Practice I: Organizational, Community and Policy Practice

University of California, Irvine (Graduate Teaching, 2004-2007)

- Summer Academic Enrichment Program
- Sociology of Los Angeles
- Contemporary Minority Politics
- Latino Metropolis

University of Illinois, Chicago (2002)

## Intro to the Barrio

Associated College of the Midwest Urban Studies Program (1998-2002)

Immigration and Labor: Becoming an American in the Global City  
 Economics, Community, and Urban Change in the Global City  
 Immigration and Ethnicity: The Journey to Becoming an America  
 Youth and the System: Making Sense of the Institutions in a Kid's Life  
 The Immigrant Dilemma: Changing Demographics and a City's Response.  
 Chicago Communities: Race and Ethnicity/Art and Culture.  
 Communities, Institutions, and Families in Chicago.

## STUDENT ADVISING

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### Dissertation Committees

Matthew Shaw, HGSE, (**Assistant Professor, Vanderbilt**).  
 Eve Ewing, HGSE, (**Assistant Professor, University of Chicago**).  
 Benjamin Roth, University of Chicago (**Assistant Professor, U. South Carolina**).  
 Kevin Escudero, University of California, Berkeley 2014. (**Assistant Professor, Brown University**)  
 Joanna Perez, University of Illinois, (**Assistant Professor, Cal State Dominguez Hills**)  
 Thomas Swerts, University of Chicago (**Postdoctoral Fellow, University of Antwerp**)  
 Marcelle Medford-Lee, University of Chicago, (**Postdoctoral Fellow, University of Connecticut**)  
 Michele Statz, University of Washington, (**Postdoctoral Fellow, University of Minnesota**)  
 Daysi Diaz-Strong, University of Chicago (current student).  
 Matt Maronic, University of Chicago (current student)  
 Maria Luna-Duarte, University of Illinois Chicago (current student)  
 Alessandra Bazo Vienrich, University of Massachusetts, Boston (current student)  
 Deepa Vasudevan, HGSE (current student)  
 Abena Subira Mackall, HGSE (current student)  
 Stephany Cuevas, HGSE (current student).  
 Carolina Valdivia, HGSE (current student).  
 Jain Lee, HGSE (current student)  
 Sarah Rendon-Garcia, HGSE (current student).  
 Jonathan Hampton, HGSE (current student)  
 Daphne Penn, HGSE (current student)  
 Clint Smith, HGSE (current student)  
 Martha Franco, HGSE (current student)  
 Carlos Aguilar (current student)

### Undergraduate Thesis Advising

Lisette Candia Diaz, Harvard College, 2016  
 Juan Guevara, The College, University of Chicago, 2013  
 Michele Suarez, University of Washington, 2010

### Other Advising (Ph.D. Proposal Committees)

Miriam Valdovinos, University of Washington (**Assistant Professor, University of Connecticut**)  
 JoAnn Lee, University of Washington (**Assistant Professor, George Mason University**)  
 Marcela García-Castañón, University of Washington (**Assistant Professor, San Francisco State University**)  
 Natasha Merchant, University of Washington (**Assistant Professor, University of North Georgia**)  
 Eric Waithaka, University of Washington  
 Sabrina C. Bonaparte, University of Washington

### **SELECTED PROFESSIONAL SERVICE**

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Editorial Board, <i>Sociology of Education</i>	2016
Associate Editor, <i>Social Problems</i>	2014-Present
Editorial Board, <i>Research in the Sociology of Education</i>	2014-Present
Chair, American Sociological Association Latino/a Section, Distinguished Contribution to Research Best Paper Award	2014
Committee Member, American Sociological Association International Migration Section, Distinguished Contribution to Research Best Paper Award	2014
Advisory Board, Dream.US Scholarship Fund	2013-Present
Council Member (elected), American Sociological Association Latino/a Section	2012-Present
Advisory Board Member (Chosen by Mayor Rahm Emanuel), City of Chicago Office of New Americans	2102-Present
Editorial Board, <i>Social Problems</i>	2011-2014
Editorial Board, <i>Social Service Review</i>	2011-2013
Scholarship Committee, Seattle Central Community College Foundation	2011
Panel Organizer, Pacific Sociological Association Annual Meeting, Oakland	2007
Organizer, Graduate Student Mini-Conference, Center for Research on Latinos in a Global Society, UC Irvine	2006
Co-Director, UC Irvine Labor Studies Group	2005 – 2007
Organizer, Graduate Student Mini-Conference, Center for Research on Latinos in a Global Society	2005
Co-Organizer, UCI Labor Studies Conference	2002

### **UNIVERSITY SERVICE**

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Member, Committee on Ethnicity, Migration, Rights, Harvard University	2015-Present
Member, Committee on Rights & Responsibilities, HGSE	2015-Present
Member, Ph.D. Steering Committee, Harvard Graduate School of Education	2015-Present
Member, Ph.D. Admissions Committee, Harvard Graduate School of Education	2013-Present
Member, Committee on Degrees, Harvard Graduate School of Education	2013-Present
MSW Admissions Committee – UW School of Social Work	2009-2011
Social Justice Sub-Committee – UW School of Social Work	2009-2010
Qualitative Methods Committee – UW School of Social Work	2009-2010
Founder, Purple Group (support group of UW undocumented students)	2008
Dissertation Fellowship Committee, Public Policy Institute of California	2008
Co-Founder, Student Group, DREAMS (Dedication for the Realization of an Education and Always Motivated for Success) UC Irvine	2006

Gonzales 19

Search and Hire Committee, UC Irvine Department of Sociology	2004
Graduate Student Representative, UCI Sociology	2002-2005
Director Search Committee, Associated Colleges of the Midwest Urban Studies	2000
Co-Organizer Associated Colleges of the Midwest Faculty Spring Conference	2000
Faculty Search Committees, Associated Colleges of the Midwest Urban Studies	1999-2000
Policies and Procedures Committee, Associated Colleges of the Midwest	1999

## **PROFESSIONAL MEMBERSHIPS**

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American Educational Research Association, member  
 American Sociological Association, member  
 Eastern Sociological Society, member  
 Pacific Sociological Association, member  
 Law and Society Association, member

## **REVIEWER**

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### **Journal Manuscript Reviewer**

*American Sociological Review, American Journal of Sociology, Demography, Ethnicities, Social Forces, Social Problems, Journal of Ethnic and Migration Studies, Sociological Forum, Sociological Perspectives, International Migration Review, Ethnos, Mexican Studies, Sociology of Education, Review of Higher Education, Latino Studies, Analyses of Social Issues and Public Policy, Journal of Latino-Latin American Studies, British Journal of Social Work, Childhood, Sociology Quarterly, Education Policy.*

### **Book Manuscript Reviewer**

Stanford University Press  
 New York University Press  
 Cambridge University Press  
 University of California Press  
 Palgrave Press

### **Grant Reviewer**

National Science Foundation  
 Russell Sage Foundation

### **International Dissertation, Outside Reviewer**

Elizabeth Benedict Christensen, Copenhagen Business School

# **EXHIBIT 32**

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*Service Employees International Union Local 521*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

THE REGENTS OF THE UNIVERSITY OF CALIFORNIA and JANET NAPOLITANO, in her official capacity as President of the University of California,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY and ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

**DECLARATION OF MIRIAM GONZALEZ AVILA**

1 STATE OF CALIFORNIA, STATE OF  
2 MAINE, STATE OF MARYLAND, and  
STATE OF MINNESOTA,

3 Plaintiffs,

4 v.

5 U.S. DEPARTMENT OF HOMELAND  
6 SECURITY, ELAINE DUKE, in her official  
7 capacity as Acting Secretary of the Department  
of Homeland Security, and the UNITED  
STATES OF AMERICA,

8 Defendants.

CASE NO. 17-CV-05235-WHA

9 CITY OF SAN JOSE, a municipal corporation,

10 Plaintiffs,

11 v.

12 DONALD J. TRUMP, President of the United  
13 States, in his official capacity, ELAINE C.  
DUKE, in her official capacity, and the  
14 UNITED STATES OF AMERICA,

15 Defendants.

CASE NO. 17-CV-05329-WHA

16 DULCE GARCIA, MIRIAM GONZALEZ  
17 AVILA, SAUL JIMENEZ SUAREZ,  
18 VIRIDIANA CHABOLLA MENDOZA,  
NORMA RAMIREZ, and JIRAYUT  
LATTHIVONGSKORN,

19 Plaintiffs,

20 v.

21 UNITED STATES OF AMERICA, DONALD  
22 J. TRUMP, in his official capacity as President  
of the United States, U.S. DEPARTMENT OF  
23 HOMELAND SECURITY, and ELAINE  
DUKE, in her official capacity as Acting  
Secretary of Homeland Security,

24 Defendants.

CASE NO. 17-CV-05380-WHA



1 COUNTY OF SANTA CLARA and  
2 SERVICE EMPLOYEES INTERNATIONAL  
UNION LOCAL 521,

3 Plaintiffs,

4 v.

5 DONALD J. TRUMP, in his official capacity  
as President of the United States, JEFFERSON  
6 BEAUREGARD SESSIONS, in his official  
capacity as Attorney General of the United  
7 States; ELAINE DUKE, in her official  
capacity as Acting Secretary of the Department  
8 of Homeland Security; and U.S.  
DEPARTMENT OF HOMELAND  
9 SECURITY,

10 Defendants.

CASE NO. 17-CV-05813-WHA

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1 I, MIRIAM GONZALEZ AVILA, declare:

2 1. I am a party in the above-captioned action. I make this declaration based on my personal  
3 knowledge. If called as a witness, I could and would testify competently on the facts stated herein.

4 **My Early Life**

5 2. I was born in La Barca, Jalisco, Mexico on November 14, 1993. My parents brought me  
6 and my two siblings to the United States in May 2000, when I was six years old. I have not been back to  
7 Mexico since that day, and I have long considered the United States my home.

8 3. Economic necessity drove my parents to immigrate to the United States. Back in  
9 Mexico, my dad used to work in the fields doing hard manual labor, but he still did not make enough  
10 income to support our family. For a period of time, he worked in the United States and sent money to  
11 my mother to take care of me and my siblings. Ultimately, the distance and two separate households  
12 were too big of a burden on my father, so he made the decision to bring my mother and us to the United  
13 States as well.

14 4. I was raised in the Boyle Heights neighborhood of Los Angeles. When we first moved to  
15 Los Angeles in 2000, my parents could not afford to get their own place, so we lived with my uncle—  
16 my father's brother—who was a huge help to us back then and still continues to be a support system for  
17 my whole family. At the time, there were six of us living in a two-bedroom apartment. My father  
18 worked at a meat processing factory with my uncle, and my mother stayed home to take care of us.

19 5. My parents instilled the value of family in me and my siblings since we were young  
20 children. To this day, I am incredibly close to my family. As the oldest child, I often found myself  
21 taking care of my siblings, as well as assisting my mom with anything that required fluency in English.  
22 For example, I accompanied my mom to parent-teacher conferences for all of my siblings, to make sure  
23 that she could comfortably communicate with the teachers, who often did not speak Spanish.

24 6. Watching my father and his brother support each other through everything life threw at us  
25 also showed me the value of family. As an example, in 2009, my father lost his job when the factory he  
26 had been working at closed, and my uncle financially supported our family until my father found a job at  
27 another meat processing factory the following year.

1           7.       Growing up, I knew that I was not born in the United States, but until I was older, I did  
2 not realize what it meant to be undocumented. My parents always told me that my job was to be a good  
3 student, so I focused all my energy on doing well in school and making my parents proud.

4           8.       I first learned what it meant to be undocumented when I was in the seventh grade. My  
5 friends and I wanted to apply for jobs assisting our former elementary teacher, and we needed to provide  
6 a Social Security Number. Without thinking twice about it, I asked my mom for my Social Security  
7 Number. It was at that point that my mom explained to me that I did not have a Social Security Number  
8 and that I was an undocumented immigrant.

9           9.       My mom told me not to tell anyone that I was undocumented. She was afraid that this  
10 information would land in the hands of the wrong people, and that someone would report us and get us  
11 deported. My mother lived in constant fear of this. My father was similarly concerned about our  
12 undocumented status. He never allowed me to drive. He told me that I needed to be a model immigrant,  
13 so working under the table was never something I was allowed to even consider. Instead, my dad took  
14 the risk of working under the table and carried the heavy burden of supporting our entire family by  
15 himself, which is something I will always be grateful for.

16           10.      Finding out about my undocumented status changed my life. Until then, I never thought I  
17 was different from anyone else or that there were things I did not have access to. I thought that as long  
18 as I studied hard, I could achieve anything I put my mind to. When I was in eighth grade, my cousin  
19 told me that I was studying hard for no reason because as an undocumented immigrant, I would never be  
20 able to go to college. I still remember that day as if it was yesterday, and I do not think I will ever forget  
21 these words. I felt incredibly hurt, devastated, and angry. I did not know if my cousin was telling the  
22 truth, but I made a decision on that day that I was going to prove her wrong.

23           11.      While I was definitely scared to tell people about my immigration status—in fact, I  
24 watched my best friend’s father get deported and saw the disastrous effects it had on her and her  
25 family—this incident with my cousin motivated me to be more open about my undocumented status. I  
26 realized that if I wanted to succeed and go to college, I needed to find teachers and other mentors who  
27 could support me and guide me, as an undocumented person, through that process.

1           12.     When I was in high school, I confided in my counselor and some teachers about my  
2 status as an undocumented person. To my happiness and relief, my counselor and teachers informed me  
3 that I actually could go to college, despite what my cousin had told me.

4           13.     At that point, I decided to become more vocal about my status, regardless of my mother's  
5 warnings, because I realized that in order to succeed, I needed allies and support. I also knew many  
6 other students at my school who were undocumented, so I wanted to get resources and support not just  
7 for me, but for them as well. I also found great comfort in confiding in someone about this big secret in  
8 my life, and I was fortunate to have teachers in my life who encouraged and supported me.

9           14.     Telling people about my undocumented status did not come without its share of  
10 embarrassment and distress, however. My friends would often make jokes about my status. For  
11 example, I had seven close friends I met while playing baseball, and three of us were undocumented in  
12 that group. The "documented" students often made jokes about how we would get deported, or that we  
13 were wasting our time studying because we could be sent back to Mexico any moment. Even though  
14 these jokes were not ill-intentioned, and although my undocumented friends and I always tried to laugh  
15 them off, they definitely hurt and embarrassed me. More importantly, they served as a constant  
16 reminder of my terrible fear, which had gotten especially real since the deportation of my best friend's  
17 father, that I could be separated from my family and deported.

18           15.     Despite these struggles, I was able to remain focused on my studies, and I graduated as  
19 Valedictorian of my class. I was accepted to a number of colleges within the University of California  
20 system. Even though I was so excited about these incredible opportunities, I struggled to decide if I  
21 should to go a four-year institution or a community college, for financial reasons. My father barely  
22 made enough money to support our family, and my undocumented status prevented me from securing  
23 any money through work or federal financial aid.

24           16.     My father wanted me to go to community college because he was afraid that we would  
25 not be able to afford my tuition. However, I was determined to go to UCLA—I had worked so hard to  
26 get accepted and I did not want to lose out on a once-in-a-lifetime opportunity. So I spent over 100  
27 hours applying to scholarships that did not require information about my immigration status, and  
28 managed to obtain almost \$10,000 to pay for my first year of college. I broke down all of my expenses

1 for my father, and showed him how exactly I was going to pay for every single item, and he finally gave  
2 me his blessing to go after my dream of attending UCLA.

3 **My UCLA Experience**

4 17. I entered UCLA in the Fall of 2011, and graduated in Spring of 2016, with a bachelor's  
5 degree, with a major in Anthropology and a minor in Classical Civilizations.

6 18. Attending UCLA was a dream come true, but I quickly realized just how many obstacles  
7 I had to overcome to succeed there.

8 19. One of my big challenges was my long commute. In order to save money, I lived at  
9 home. Because I could not get my driver's license, I used to commute to school by bus. I would spent  
10 3-4 hours every day commuting, which significantly reduced the amount of time I had to study or  
11 participate in social activities

12 20. The most overwhelming challenge for me, though, was paying for school. Despite having  
13 secured almost \$10,000 through scholarships, I found myself \$800 short when the tuition costs increased  
14 in the Winter quarter of 2012. I remember how embarrassed I felt telling my father about this, since he  
15 warned me about this, and I decided to enroll at UCLA despite his concerns about our financial  
16 instability. My father did not have any money at the time, but my uncle told me not to worry about it,  
17 and took out a loan for \$1000, which I used to pay for my tuition. I had applied to a number of  
18 scholarships again, and was hoping that I would get one in time to pay for my Spring quarter tuition.

19 21. During Week 6 of the Winter quarter I found out that I did not get the scholarship, which  
20 would have allowed me to pay for my Spring quarter. I was devastated, stressed out, and incredibly  
21 worried about my college education going forward. I started thinking that my father was right, and I felt  
22 guilty and selfish for having spent so much money on my tuition already, when my family had so little.  
23 In 2012, I had no choice but to take the Spring quarter off as I simply could not find the money for  
24 tuition.

25 22. Even though I was ultimately able to go back to UCLA in the Winter 2013, this was a  
26 very hard time for me. I was unable to go to school or work for the entire Spring and Fall quarter, so I  
27 fell into a depression, constantly having feelings of shame and anxiety, thinking I had made a mistake  
28

1 enrolling at UCLA, and worrying about my future. This gap in my education also caused me to graduate  
2 later than I would have otherwise graduated.

3 23. Despite the many challenges, I decided to make the best of my experience at UCLA. I  
4 joined IDEAS (“Improving Dreams, Equality, Access, and Success”), an organization dedicated to  
5 serving undocumented students at UCLA and in the broader Los Angeles community. Founded in 2001,  
6 this organization serves many functions aimed at supporting undocumented students and the larger  
7 community.

8 24. I became involved in the community service component of IDEAS, helping put together  
9 AB540 workshops and getting involved in the community and spreading awareness about resources  
10 available to undocumented students. I also volunteered for the Educator’s Conference in the Fall of  
11 2011, and for the Immigrant Youth Empowerment Conference in Spring 2012 – the biggest  
12 undocumented youth conference hosted by undocumented students in the nation. After two years  
13 volunteering, I applied for the position of a Project Director at IDEAS.

#### 14 **LEARNING ABOUT AND APPLYING FOR DACA**

15 25. I first heard about DACA on the day that President Obama announced it—June 15, 2012.  
16 I was at a rally downtown protesting deportations with other members of IDEAS, some of whom were  
17 actually graduating that day. Word spread throughout the crowd quickly, and the leaders of the protest  
18 made an official announcement about DACA. At that point, all we really knew was that DACA  
19 provided protection from deportation and the ability to work. Everyone was hugging and crying. It was  
20 a monumental moment for me, and an especially meaningful announcement for my friends who were  
21 graduating that day, as they could finally imagine that they would be able to use their degrees and work  
22 in their chosen field upon graduation.

23 26. I immediately took it upon myself to inform my community about DACA through my  
24 involvement at IDEAS. First as a volunteer and then as a Project Director, I personally conducted over  
25 120 workshops regarding the resources available to undocumented students, the California Dream Act,  
26 and the mechanics of DACA and the application process over the next few years. Although I built on  
27 the materials available from previous years, I put together the talking points for all the workshops. I also  
28

1 helped plan the Immigrant Youth Empowerment Conference in the Spring of 2014, which had an  
2 attendance of 1200 students.

3 27. Even though I was helping others with their DACA applications, I was still nervous about  
4 applying myself. My parents pushed me to apply right away, but I wanted to see other people go  
5 through the process first. I was worried about giving the government my personal information. I had  
6 spent my whole life being afraid of the government and was skeptical of trusting them now. Finally,  
7 after much consideration, I decided to trust the government's promise that my information would not be  
8 used to deport me or my family. I was tired of wondering why I was struggling and working so hard,  
9 when I would not even be able to use my degree to get the job I wanted. I was also influenced by the  
10 numerous statements of encouragement by public officials all over the news, and I was inspired by the  
11 excitement and optimism of all of my fellow undocumented students.

12 28. I applied for DACA in December 2012, and was approved on March 21, 2013. Attached  
13 as Exhibit A is a true and correct copy of my Form I-797 Notice of Action granting my DACA status  
14 from March 21, 2013 until March 20, 2015.

#### 15 HOW DACA HAS BENEFITTED ME

16 29. My DACA status opened many doors for me, including seemingly trivial things, such as  
17 the ability to travel. I vividly remember the first time I got on a plane. It was December of 2014. I was  
18 finally able to take a trip to the Midwest and the East Coast—first to visit my mother's relatives in  
19 Chicago, and then spend some time in New York City with my friends. Even though all my friends had  
20 told me flying was not a big deal, I remember how foreign everything seemed to me, and how nervous I  
21 was going through the unfamiliar airports by myself. It was a thrilling experience nevertheless, showing  
22 me that there were so many things I had yet to experience and learn about in the world. Having DACA  
23 status opened these opportunities for me.

24 30. After my DACA application was approved in March of 2013, I immediately used my  
25 work authorization to get a job as a parking attendant at UCLA. This extra income was crucial to  
26 helping me finish my education. I no longer had to take any time off school because of the inability to  
27 pay tuition, and I was able to graduate in 2016, only a year later than expected. I was also able to afford  
28 an apartment closer to campus for a few quarters.

1           31. With DACA, I finally felt like I was going to have options, something I had never felt I  
2 had before. It gave me the security to say to anyone who might come knocking on my door that they  
3 could not deport me because I was protected. I finally felt like a productive member of the society,  
4 being able to work and support my family. Also, I felt much less anxious about my future, and I finally  
5 felt like I belonged and was an equal member of the society.

6           32. Having DACA also allowed me to get my driver's license in January 2014. This made a  
7 huge difference in my life. Not only was I able to drive myself around, I used my license to help the  
8 IDEAS organization. It was my driver's license that allowed me to do as many as 120 workshops all  
9 over Los Angeles. Additionally, my driver's license allowed me to help my family by giving my  
10 siblings rides as needed, or by taking my parents to their appointments. My family jokingly calls me the  
11 "family UBER," and I feel so happy to finally be able to help out in this way.

12           33. I also opened my first credit card in November 2016. I am working hard to build credit  
13 so I can one day own a home and raise my own future family here. Additionally, during my last year at  
14 UCLA I took out a loan for \$1500 in order to provide for myself financially before starting at a job.

15           34. DACA has also helped me help my family. My sister was accepted to UC Santa Cruz  
16 while I was in college. Just as they had struggled to come up with the money to pay for my college, my  
17 family was having a tough time figuring out how to pay for college for my sister. I decided to give up  
18 my apartment and move back home so I could use the money I made as a parking attendant to help my  
19 sister pay for housing in Santa Cruz. I did not want her to have to stay in Los Angeles to live at home  
20 for college, as I had to.

21           35. I renewed my DACA status in March of 2015, which gave me a valid DACA status until  
22 March of 2017. Attached as Exhibit B is a true and correct copy of my Form I-797 Notice of Action  
23 granting my DACA status from March 20, 2015 until March 19, 2017.

24           36. It was very important to me to have the ability to renew my DACA status because if I did  
25 not get it renewed, I would lose my job as a parking attendant at UCLA, which helped me pay for my  
26 tuition and also support my family. Luckily, it was a streamlined process, and I even got reminders  
27 from the government to renew my DACA status.





**Impact of Losing DACA Status**

1  
2 42. The announcement of the DACA rescission has changed my life in more ways than I  
3 could even explain.

4 43. In the morning, on my way to work, I often see a DHS truck and ICE officers in the  
5 parking lot of the Staples next to the local Starbucks. I am constantly reminded that there are raids  
6 happening in my community, and I am so fearful that the next person who is targeted could be me or my  
7 family. I have also read stories of the horrors and inhumane conditions people face awaiting deportation  
8 in detention centers, so I fear that I would be treated inhumanely before being deported to a country that  
9 I have no actual ties with.

10 44. Since August, I have had terrible migraines for the first time. In fact, I was so worried  
11 that something was seriously wrong with my health that I saw a doctor in early October. She told me  
12 that my migraines were cause by stress. I continue to experience migraines and severe stress and  
13 anxiety, which I know is tied directly to my new uncertainty over my future. Whereas DACA had given  
14 me a sense of security, the recent rumors and eventual announcement of the rescission has stripped me  
15 of that sense of security. It is this stress and anxiety that is clearly manifesting itself in physical pain.

16 45. If I lose my DACA status, I will lose the life I have worked so hard to build for myself  
17 and my family.

18 46. If I lose my DACA status, I can no longer work at Crown Prep Academy. My students  
19 have been asking me if I will be able to continue teaching them in the 2018-2019 academic year. Since  
20 my DACA status is currently set to expire in the middle of the Spring 2019 semester, I do not know  
21 what to tell them. I tell them that I do not know. This breaks my heart. My students already have  
22 abandonment issues because of previous teachers who told them they would return to reach them but did  
23 not, so this fills my students with a sense of anxiety that I wish they did not have to deal with.

24 47. If I lose my DACA status, without work authorization, my Master's Degree in Education  
25 will mean absolutely nothing, and my dreams of one day helping create an education system that is more  
26 fair and accessible to all children will be destroyed.

27 48. If I lose my DACA status, I will be unable to help support my family. Since starting  
28 work at Crown Prep Academy, I have been providing significant financial assistance to my parents. I

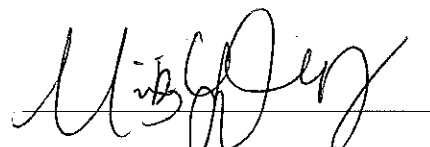
1 will also be unable to continue paying for my sister's education. I will also be unable to support my  
2 family in so many ways that I cannot even quantify, since they rely heavily on me, as the person who is  
3 fluent in English and knowledgeable about the laws and developments in this country.

4 49. Finally, if I lose my DACA status, I may be deported. I am devastated thinking about  
5 being separated from my family. I am also terrified at the prospect of being sent to a country I have no  
6 real connection to. Although I have a few relatives in Mexico, I have not been there since I was six, and  
7 I have no idea what I would do there. I do not think I would be able to easily teach there, since I am  
8 completely unfamiliar with the process and requirements for teachers in Mexico.

9 50. Since the announcement of DACA rescission, I struggle every day to continue to live my  
10 life as though nothing has changed. I continue to work hard and be as optimistic as possible for my  
11 students and family. I continue to work on my thesis as rigorously as before and try to make myself  
12 believe that I will have the opportunity to use my Master's Degree. I try my best to be a daughter, sister,  
13 and a member of my community. But in fact, everything has changed already because there is not a  
14 single day that goes by without me thinking that all of my hard work may be for nothing and my dreams  
15 and the dreams of my family will be crushed if my DACA status is ultimately rescinded.

16  
17 I declare under penalty of perjury that the foregoing is true and correct.

18 Executed on October 30, 2017, in Los Angeles, California.

19  
20  
21   
22 MIRIAM GONZALEZ AVILA

# **EXHIBIT A**



RECEIPT NUMBER WAC-13-902-53004		CASE TYPE I821 /I-821D
RECEIPT DATE December 4, 2012	PRIORITY DATE	APPLICANT [REDACTED] GONZALEZ AVILA, MIRIAM B.
NOTICE DATE March 21, 2013	PAGE 1 of 1	
MIRIAM BERENICE GONZALEZ AVILA [REDACTED]		Notice Type: Approval Notice Valid from 03/21/2013 to 03/20/2015

Notice of Deferred Action:

This notice is to inform you regarding U.S. Citizenship and Immigration Services's (USCIS) decision on your Form I-821D, Consideration of Deferred Action for Childhood Arrivals.

USCIS, in the exercise of its prosecutorial discretion, has decided to defer action in your case. Deferred action is an exercise of prosecutorial discretion by USCIS not to pursue the removal of an individual from the United States for a specific period. Deferred action does not confer or alter any immigration status.

Unless terminated, this decision to defer removal action will remain in effect for 2 years from the date of this notice.

This form does not constitute employment authorization, nor may it be used in place of an Employment Authorization Document. The 90-day period for reviewing Form I-765, Application for Employment Authorization, filed together with Form I-821D begins as of the date of this approval notice. If Form I-765 is approved, you will receive your Employment Authorization Document separately by mail. Subsequent criminal activity after your case has been deferred is likely to result in termination of your deferred action. This notice does not provide permission to travel outside of the United States.

You are required to notify USCIS if you change your address. You may use the Alien's Change of Address Card, Form AR-11, to report a new address. That form may be found at [www.uscis.gov](http://www.uscis.gov). There is no fee for this change of address form.

NOTICE: USCIS and the U.S. Department of Homeland Security (DHS) reserve the right to verify the information submitted in this request and/or supporting documentation to ensure conformity with applicable laws, rules, regulations, and other authorities. Methods used for verifying information may include, but are not limited to, the review of public information and records, contact by correspondence, the internet, or telephone, and site inspections of businesses and residences. Information obtained during the course of the verification will be used to determine whether termination of deferred action and/or removal proceedings are appropriate if, for example, the requestor committed fraud or misrepresentation in his or her request for consideration of deferred action for childhood arrivals, or engaged in subsequent criminal activity following the submission of his or her request. Individuals for whom removal action is deferred under Deferred Action for Childhood Arrivals may, in the sole discretion of USCIS and DHS, be provided an opportunity to address derogatory information before deferred action is terminated and/or removal proceedings are initiated.

Please see the additional information on the back. You will be notified separately about any other cases you filed.  
U.S. CITIZENSHIP & IMMIGRATION SVC  
CALIFORNIA SERVICE CENTER  
P. O. BOX 30111  
LAGUNA NIGUEL CA 92607-0111  
Customer Service Telephone: (800) 375-5283



- *Please save this notice for your records. Please enclose a copy if you have to write us or a U. S. Consulate about this case, or if you file another application based on this decision.*
- *You will be notified separately about any other applications or petitions you have filed.*

---

### ***Additional Information***

#### **GENERAL.**

The filing of an application or petition does not in itself allow a person to enter the United States and does not confer any other right or benefit.

#### **INQUIRIES.**

You should contact the office listed on the reverse side of this notice if you have questions about the notice, or questions about the status of your application or petition. *We recommend you call.* However, if you write us, please enclose a copy of this notice with your letter.

#### **APPROVAL OF NONIMMIGRANT PETITION.**

Approval of a nonimmigrant petition means that the person for whom it was filed has been found eligible for the requested classification. If this notice indicated we are notifying a U.S. Consulate about the approval for the purpose of visa issuance, and you or the person you filed for have questions about visa issuance, please contact the appropriate U.S. Consulate directly.

#### **APPROVAL OF AN IMMIGRANT PETITION.**

Approval of an immigrant petition does not convey any right or status. The approved petition simply establishes a basis upon which the person you filed for can apply for an immigrant or fiance(e) visa or for adjustment of status.

A person is not guaranteed issuance of a visa or a grant of adjustment simply because this petition is approved. Those processes look at additional criteria.

If this notice indicates we have approved the immigrant petition you filed, and have forwarded it to the Department of State Immigrant Visa Processing Center, that office will contact the person you filed the petition for directly with information about visa issuance.

In addition to the information on the reverse of this notice, the instructions for the petition you filed provide additional information about processing after approval of the petition.

For more information about whether a person who is already in the U.S. can apply for adjustment of status, please see Form I-485, *Application to Register Permanent Residence or Adjust Status*.



RECEIPT NUMBER WAC-13-902-53006		CASE TYPE I765 APPLICATION FOR EMPLOYMENT AUTHORIZATION	
RECEIPT DATE December 4, 2012	PRIORITY DATE	APPLICANT [REDACTED]	
NOTICE DATE March 21, 2013	PAGE 1 of 1	GONZALEZ AVILA, MIRIAM B.	
MIRIAM BERENICE GONZALEZ AVILA [REDACTED]		Notice Type: Approval Notice Class: C33 Valid from 03/21/2013 to 03/20/2015	

Your application for employment authorization has been approved. The Form I-766, Employment Authorization Document, was sent under separate cover to the beneficiary.

This card authorizes your employment in the United States. Show this card to your employer to verify authorization to work during the dates on the card.

If any information on the card is incorrect, please write the office listed below. Include your Employment Authorization Document, I-766, a photocopy of this notice, and evidence to support the necessary corrections.

THIS APPROVAL NOTICE IS NOT A VISA OR EVIDENCE OF EMPLOYMENT AUTHORIZATION, NOR MAY IT BE USED IN PLACE OF A VISA OR FORM I-766.

As a reminder, you may request to change employers under INA 204(j) if your Form I-485 Adjustment application has been pending for at least 180 days and your underlying Form I-140 is approved or is still pending. In order to do so, you should supplement the Form I-485 record of proceeding with documentation relating to the new job offer that forms the basis of the INA 204(j) portability request. For more information on how to request to change employers and what information is required to supplement the Form I-485, please visit [www.uscis.gov](http://www.uscis.gov).

THIS FORM IS NOT A VISA NOR MAY IT BE USED IN PLACE OF A VISA.

NOTICE: Although this application/petition has been approved, USCIS and the U.S. Department of Homeland Security reserve the right to verify the information submitted in this application, petition and/or supporting documentation to ensure conformity with applicable laws, rules, regulations, and other authorities. Methods used for verifying information may include, but are not limited to, the review of public information and records, contact by correspondence, the internet, or telephone, and site inspections of businesses and residences. Information obtained during the course of verification will be used to determine whether revocation, rescission, and/or removal proceedings are appropriate. Applicants, petitioners, and representatives of record will be provided an opportunity to address derogatory information before any formal proceeding is initiated.

Please see the additional information on the back. You will be notified separately about any other cases you filed.

U.S. CITIZENSHIP & IMMIGRATION SVC  
CALIFORNIA SERVICE CENTER  
P. O. BOX 30111  
LAGUNA NIGUEL, CA 92607-0111  
Customer Service Telephone: (800) 375-5283



- *Please save this notice for your records. Please enclose a copy if you have to write us or a U. S. Consulate about this case, or if you file another application based on this decision.*
- *You will be notified separately about any other applications or petitions you have filed.*

---

### ***Additional Information***

#### **GENERAL.**

The filing of an application or petition does not in itself allow a person to enter the United States and does not confer any other right or benefit.

#### **INQUIRIES.**

You should contact the office listed on the reverse side of this notice if you have questions about the notice, or questions about the status of your application or petition. *We recommend you call.* However, if you write us, please enclose a copy of this notice with your letter.

#### **APPROVAL OF NONIMMIGRANT PETITION.**

Approval of a nonimmigrant petition means that the person for whom it was filed has been found eligible for the requested classification. If this notice indicated we are notifying a U.S. Consulate about the approval for the purpose of visa issuance, and you or the person you filed for have questions about visa issuance, please contact the appropriate U.S. Consulate directly.

#### **APPROVAL OF AN IMMIGRANT PETITION.**

Approval of an immigrant petition does not convey any right or status. The approved petition simply establishes a basis upon which the person you filed for can apply for an immigrant or fiance(e) visa or for adjustment of status.

A person is not guaranteed issuance of a visa or a grant of adjustment simply because this petition is approved. Those processes look at additional criteria.

If this notice indicates we have approved the immigrant petition you filed, and have forwarded it to the Department of State Immigrant Visa Processing Center, that office will contact the person you filed the petition for directly with information about visa issuance.

In addition to the information on the reverse of this notice, the instructions for the petition you filed provide additional information about processing after approval of the petition.

For more information about whether a person who is already in the U.S. can apply for adjustment of status, please see Form I-485, *Application to Register Permanent Residence or Adjust Status*.



**THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.**

RECEIPT NUMBER WAC-13-902-53004		CASE TYPE I821D CONSIDERATION OF DEFERRED ACTION FOR CHILDHOOD ARRIVALS	
RECEIPT DATE December 4, 2012	PRIORITY DATE	APPLICANT [REDACTED] GONZALEZ AVILA, MIRIAM B.	
NOTICE DATE December 10, 2014	PAGE 1 of 1		
MIRIAM BERENICE GONZALEZ AVILA [REDACTED]		Notice Type: Notice of Action	

IF YOU HAVE ALREADY SUBMITTED YOUR REQUEST TO RENEW DEFERRED ACTION UNDER DACA, PLEASE DISREGARD THIS NOTICE.

Our records indicate that U.S. Citizenship and Immigration Services (USCIS) granted DACA in your case and that your current period of deferred action will expire in less than 100 days. If you wish to avoid a lapse in your period of deferred action and employment authorization, you must file a DACA renewal request with USCIS as soon as possible. Form I-821D, Consideration of Deferred Action for Childhood Arrivals, was recently updated to allow for renewal filings and is available online at <http://www.uscis.gov/i-821d>. This form must be completed, properly signed and accompanied by a Form I-765, Application for Employment Authorization, and Form I-765WS, I-765 Worksheet.

Please be aware that if your current period of deferred action expires before you receive a renewal of DACA, you will accrue unlawful presence and will not be authorized to work. If you have not already done so, USCIS encourages you to submit your renewal request as soon as possible.

Deferred action is a discretionary determination to defer removal action of an individual as an act of prosecutorial discretion and each case will be considered on an individual, case-by-case basis. USCIS will notify you of its decision in writing.

For additional information on DACA, including documentation requirements for renewal or to download the required forms, please visit [www.uscis.gov/childhoodarrivals](http://www.uscis.gov/childhoodarrivals). If you have already filed your renewal request with USCIS, please disregard this notice. You can check your case status online by visiting <https://egov.uscis.gov/cris/Dashboard.do>.

THIS FORM IS NOT A VISA AND MAY NOT BE USED IN PLACE OF A VISA.

Please see the additional information on the back. You will be notified separately about any other cases you filed.

U.S. CITIZENSHIP & IMMIGRATION SVC

CALIFORNIA SERVICE CENTER

P. O. BOX 30111

LAGUNA NIGUEL CA 92607-0111

Customer Service Telephone: (800) 375-5283



Please see the back of this notice for important information.

0408

## Notice for Customers with Disabilities

USCIS is committed to providing customers with disabilities the same level of access to its programs and activities that customers without disabilities have (see the USCIS Web site for an explanation and examples of accommodations). If you need an accommodation for your appointment due to a disability that affects your access to a USCIS program or activity OR if a disability prevents you from going to the designated USCIS location for your appointment, please call the National Customer Service Center (NCSC) at 1-800-375-5283 (TDD: 1-800-767-1833) to request an accommodation.

**Call the NCSC even if you indicated on your application or petition that you require an accommodation. Also, you must contact the NCSC to request an accommodation each time you have an appointment with USCIS.** For example, you must call the NCSC to request an accommodation for your biometrics appointment and again for an accommodation for your interview appointment.

NOTICE: All domestic USCIS offices are accessible to individuals with physical disabilities. You do not need to request an accommodation if your ONLY need is an accommodation that would enable or facilitate you having physical access to a domestic USCIS office.

Note: Naturalization applicants should **not** call the NCSC to request an exception from the English and/or civics testing requirement. You **must** submit Form *N-648, Medical Certification for Disability Exceptions* to request an exception. See the form instructions for additional information.

## Social Security Administration Important Information

Social Security Administration  
SOCIAL SECURITY  
215 N SOTO STREET  
LOS ANGELES, CA 90033-2914  
Date: April 2, 2013

MIRIAM B GONZALEZ AVILA  


This is a receipt to show that you applied for a Social Security card on April 2, 2013. You should have your card in about 2 weeks. Any document(s) you have submitted are being returned to you with this receipt.

You can use your Social Security card for work only if you have authorization from the Department of Homeland Security.

If you do not receive your Social Security card within 2 weeks, please let us know. You may call, write or visit any Social Security office. If you visit an office, please bring this receipt with you. To protect your privacy, we will not disclose a Social Security number over the telephone.

The Social Security Administration is required by law to limit replacement Social Security cards to three per year and ten per lifetime. Do not carry your Social Security card with you. Keep it in a safe location, not in your wallet.

Field Office Manager

BOYLE HEIGHTS CALIFORNIA  
T. FULTON  
APR 02 2013  
SSA FIELD OFFICE

**THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.**

NOTICE TYPE Receipt		NOTICE DATE December 05, 2012
CASE TYPE I-765, Application for Employment Authorization		USCIS ALIEN NUMBER [REDACTED]
RECEIPT NUMBER WAC1390253006	RECEIVED DATE December 03, 2012	PAGE 1 of 1
		DATE OF BIRTH [REDACTED]

MIRIAM B. GONZALEZ AVILA

1 453



**PAYMENT INFORMATION:**

Application/Petition Fee:	\$465.00
Biometrics Fee:	\$0.00
Total Amount Received:	\$465.00
Total Balance Due:	\$0.00

**NAME AND MAILING ADDRESS**

Full and complete payment has been received on the above application. **Please notify us immediately if any of the above information is incorrect.** If you find it necessary to contact this office in writing, you must include a copy of this receipt notice with your inquiry.

**BIOMETRICS -**

The next step is to have your biometrics taken at a USCIS Application Support Center (ASC). You will receive a notice in the mail regarding when USCIS has scheduled you for your ASC appointment.

If you have questions about possible immigration benefits and services, filing information, or USCIS forms, please call the USCIS National Customer Service Center (NCSC) at **1-800-375-5283**. If you are hearing impaired, please call the NCSC TDD at **1-800-767-1833**. Please also refer to the USCIS website: [www.uscis.gov](http://www.uscis.gov).

If you have any questions or comments regarding this notice or the status of your case, please contact our customer service number.

You will be notified separately about any other case you may have filed.

**USCIS Office Address:**

USCIS  
California Service Center  
P.O. Box 30111  
Laguna Niguel, CA 92607-0111

**USCIS Customer Service Number:**

(800)375-5283



0411

**THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.**

NOTICE TYPE Receipt		NOTICE DATE December 05, 2012
CASE TYPE I-821D, Consideration of Deferred Action for Childhood Arrivals		USCIS ALIEN NUMBER [REDACTED]
RECEIPT NUMBER WAC1390253004	RECEIVED DATE December 03, 2012	PAGE 1 of 1
		DATE OF BIRTH [REDACTED]

MIRIAM B. GONZALEZ AVILA

1 452



**NAME AND MAILING ADDRESS**

The above case has been received by our office and is in process.

Please verify your personal information listed above and immediately notify the USCIS National Customer Service Center at the phone number listed below if there are any changes.

If you have questions about possible immigration benefits and services, filing information, or USCIS forms, please call the USCIS National Customer Service Center (NCSC) at **1-800-375-5283**. If you are hearing impaired, please call the NCSC TDD at **1-800-767-1833**. Please also refer to the USCIS website: [www.uscis.gov](http://www.uscis.gov).

If you have any questions or comments regarding this notice or the status of your case, please contact our customer service number.

You will be notified separately about any other case you may have filed.

**USCIS Office Address:**  
USCIS  
California Service Center  
P.O. Box 30111  
Laguna Niguel, CA 92607-0111

**USCIS Customer Service Number:**

(800)375-5283



0412

**THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.**

<b>ASC Appointment Notice</b>	APPLICATION NUMBER WAC1390253004	WAC1390253006	NOTICE DATE 12/7/2012
	CASE TYPE 1821D I765	SOCIAL SECURITY NUMBER	USCIS A# [REDACTED]
	TCR	SERVICE CENTER WSC	PAGE 1 of 1

MIRIAM BERENICE GONZALEZ AVILA



**BIOMETRICS PROCESSING STAMP**  
 ASC SITE CODE: XUM  
 BIOMETRICS QA REVIEW BY: [Signature] ON DEC 28 2012  
 FINGERPRINTS QA REVIEW BY: [Signature] ON DEC 28 2012



To process your request, U. S. Citizenship & Immigration Services (USCIS) must capture your biometrics.

**PLEASE APPEAR AT THE BELOW APPLICATION SUPPORT CENTER AT THE DATE AND TIME SPECIFIED.  
 IF YOU FAIL TO APPEAR AS SCHEDULED, YOUR REQUEST WILL BE CONSIDERED ABANDONED.**

**APPLICATION SUPPORT CENTER**

USCIS WILSHIRE  
 1015 WILSHIRE BLVD  
 LOS ANGELES, CA 90017

**PLEASE READ THIS ENTIRE NOTICE CAREFULLY.**

**DATE AND TIME OF APPOINTMENT**

12/28/2012  
 10:00 AM

**WHEN YOU GO TO THE APPLICATION SUPPORT CENTER TO HAVE YOUR BIOMETRICS TAKEN, YOU MUST BRING:**

- 1. THIS APPOINTMENT NOTICE** and
- 2. PHOTO IDENTIFICATION.** Requestors must bring their Permanent Resident Card/Resident Alien Card, or a passport, driver's license, national ID, military ID, or State-issued photo ID. If you appear without proper identification, your biometrics may not be taken.

**CELL PHONES, CAMERAS, OR OTHER RECORDING DEVICES ARE NOT PERMITTED.**

**REQUEST FOR RESCHEDULING**

Please reschedule my appointment. Upon receipt of your request, you will be provided a new appointment notice. Make a copy of this notice for your records, then mail the original with your request to BPU, Alexandria ASC, Suite 100, 8850 Richmond Hwy, Alexandria, VA 22309-1586

APPLICATION NUMBER  
 1821D - WAC1390253004



APPLICATION NUMBER 2  
 I765 - WAC1390253006



**If you have any questions regarding this notice, please call 1-800-375-5283.**

**WARNING:** Due to limited seating availability in our lobby area, only persons who are necessary to assist with transportation or completing the biometrics worksheet should accompany you. If you have open wounds or bandages/casts when you appear, the USCIS may reschedule your appointment if it is determined your injuries will interfere with taking your biometrics.

## Notice for Customers with Disabilities

USCIS is committed to providing customers with disabilities the same level of access to its programs and activities that customers without disabilities have (see the USCIS Web site for an explanation and examples of accommodations). If you need an accommodation for your appointment due to a disability that affects your access to a USCIS program or activity OR if a disability prevents you from going to the designated USCIS location for your appointment, please call the National Customer Service Center (NCSC) at 1-800-375-5283 (TDD: 1-800-767-1833) to request an accommodation.

**Call the NCSC even if you indicated on your application or petition that you require an accommodation. Also, you must contact the NCSC to request an accommodation each time you have an appointment with USCIS.** For example, you must call the NCSC to request an accommodation for your biometrics appointment and again for an accommodation for your interview appointment.

NOTICE: All domestic USCIS offices are accessible to individuals with physical disabilities. You do not need to request an accommodation if your **ONLY** need is an accommodation that would enable or facilitate you having physical access to a domestic USCIS office.

Note: Naturalization applicants should **not** call the NCSC to request an exception from the English and/or civics testing requirement. You **must** submit Form *N-648, Medical Certification for Disability Exceptions* to request an exception. See the form instructions for additional information.

# **EXHIBIT B**





RECEIPT NUMBER LIN-15-902-29291		CASE TYPE I821D CONSIDERATION OF DEFERRED ACTION FOR CHILDHOOD ARRIVALS	
RECEIPT DATE November 14, 2014	PRIORITY DATE	APPLICANT [REDACTED]	
NOTICE DATE March 20, 2015	PAGE 1 of 1	GONZALEZ AVILA, MIRIAM B.	
MIRIAM BERENICE GONZALEZ AVILA [REDACTED]		Notice Type: Approval Notice Valid from 03/20/2015 to 03/19/2017	

Notice of Deferred Action:

This notice is to inform you regarding U.S. Citizenship and Immigration Services's (USCIS) decision on your Form I-821D, Consideration of Deferred Action for Childhood Arrivals.

USCIS, in the exercise of its prosecutorial discretion, has decided to defer action in your case. Deferred action is an exercise of prosecutorial discretion by USCIS not to pursue the removal of an individual from the United States for a specific period. Deferred action does not confer or alter any immigration status.

Unless terminated, this decision to defer removal action will remain in effect for 2 years from the date of this notice.


This form does not constitute employment authorization, nor may it be used in place of an Employment Authorization Document. The 90-day period for reviewing Form I-765, Application for Employment Authorization, filed together with Form I-821D begins as of the date of this approval notice. If Form I-765 is granted, you will receive your Employment Authorization Document separately by mail. Subsequent criminal activity after your case has been deferred is likely to result in termination of your deferred action. This notice does not provide permission to travel outside of the United States.

You are required to notify USCIS if you change your address. You may use the Alien's Change of Address Card, Form AR-11, to report a new address. That form may be found at [www.uscis.gov](http://www.uscis.gov). There is no fee for this change of address form.

NOTICE: USCIS and the U.S. Department of Homeland Security (DHS) reserve the right to verify the information submitted in this request and/or supporting documentation to ensure conformity with applicable laws, rules, regulations, and other authorities. Methods used for verifying information may include, but are not limited to, the review of public information and records, contact by correspondence, the internet, or telephone, and site inspections of businesses and residences. Information obtained during the course of the verification will be used to determine whether termination of deferred action and/or removal proceedings are appropriate if, for example, the requestor committed fraud or misrepresentation in his or her request for consideration of deferred action for childhood arrivals, or engaged in subsequent criminal activity following the submission of his or her request. Individuals for whom removal action is deferred under Deferred Action for Childhood Arrivals may, in the sole discretion of USCIS and DHS, be provided an opportunity to address derogatory information before deferred action is terminated and/or removal proceedings are initiated.

Please see the additional information on the back. You will be notified separately about any other cases you filed.

NEBRASKA SERVICE CENTER  
U. S. CITIZENSHIP & IMMIG SERVICE  
P.O. BOX 82521  
LINCOLN NE 68501-2521  
Customer Service Telephone: 800-375-5283



- *Please save this notice for your records. Please enclose a copy if you have to write us or a U. S. Consulate about this case, or if you file another application based on this decision.*
- *You will be notified separately about any other applications or petitions you have filed.*

---

### *Additional Information*

#### **GENERAL.**

The filing of an application or petition does not in itself allow a person to enter the United States and does not confer any other right or benefit.

#### **INQUIRIES.**

You should contact the office listed on the reverse side of this notice if you have questions about the notice, or questions about the status of your application or petition. *We recommend you call.* However, if you write us, please enclose a copy of this notice with your letter.

#### **APPROVAL OF NONIMMIGRANT PETITION.**

Approval of a nonimmigrant petition means that the person for whom it was filed has been found eligible for the requested classification. If this notice indicated we are notifying a U.S. Consulate about the approval for the purpose of visa issuance, and you or the person you filed for have questions about visa issuance, please contact the appropriate U.S. Consulate directly.

#### **APPROVAL OF AN IMMIGRANT PETITION.**

Approval of an immigrant petition does not convey any right or status. The approved petition simply establishes a basis upon which the person you filed for can apply for an immigrant or fiance(e) visa or for adjustment of status.

A person is not guaranteed issuance of a visa or a grant of adjustment simply because this petition is approved. Those processes look at additional criteria.

If this notice indicates we have approved the immigrant petition you filed, and have forwarded it to the Department of State Immigrant Visa Processing Center, that office will contact the person you filed the petition for directly with information about visa issuance.

In addition to the information on the reverse of this notice, the instructions for the petition you filed provide additional information about processing after approval of the petition.

For more information about whether a person who is already in the U.S. can apply for adjustment of status, please see Form I-485, *Application to Register Permanent Residence or Adjust Status*.



RECEIPT NUMBER WAC-15-903-08543		CASE TYPE I765 APPLICATION FOR EMPLOYMENT AUTHORIZATION	
RECEIPT DATE May 4, 2015	PRIORITY DATE	APPLICANT GONZALEZ AVILA, DALIA N.	
NOTICE DATE July 30, 2015	PAGE 1 of 1		
DALIA NOEMI GONZALEZ AVILA [REDACTED]		Notice Type: Approval Notice Class: C33 Valid from 07/30/2015 to 07/29/2017	

Your application for employment authorization has been approved. The Form I-766, Employment Authorization Document, was sent under separate cover to the beneficiary.

This card authorizes your employment in the United States. Show this card to your employer to verify authorization to work during the dates on the card.

If any information on the card is incorrect, please write the office listed below. Include your Employment Authorization Document, I-766, a photocopy of this notice, and evidence to support the necessary corrections.

THIS APPROVAL NOTICE IS NOT A VISA OR EVIDENCE OF EMPLOYMENT AUTHORIZATION, NOR MAY IT BE USED IN PLACE OF A VISA OR FORM I-766.

As a reminder, you may request to change employers under INA 204(j) if your Form I-485 Adjustment application has been pending for at least 180 days and your underlying Form I-140 is approved or is still pending. In order to do so, you should supplement the Form I-485 record of proceeding with documentation relating to the new job offer that forms the basis of the INA 204(j) portability request. For more information on how to request to change employers and what information is required to supplement the Form I-485, please visit [www.uscis.gov](http://www.uscis.gov).

THIS FORM IS NOT A VISA AND MAY NOT BE USED IN PLACE OF A VISA.

NOTICE: Although this application/petition has been approved, USCIS and the U.S. Department of Homeland Security reserve the right to verify the information submitted in this application, petition and/or supporting documentation to ensure conformity with applicable laws, rules, regulations, and other authorities. Methods used for verifying information may include, but are not limited to, the review of public information and records, contact by correspondence, the internet, or telephone, and site inspections of businesses and residences. Information obtained during the course of verification will be used to determine whether revocation, rescission, and/or removal proceedings are appropriate. Applicants, petitioners, and representatives of record will be provided an opportunity to address derogatory information before any formal proceeding is initiated.

Please see the additional information on the back. You will be notified separately about any other cases you filed.  
U.S. CITIZENSHIP & IMMIGRATION SVC  
CALIFORNIA SERVICE CENTER  
P. O. BOX 30111  
LAGUNA NIGUEL CA 92607-0111  
Customer Service Telephone: (800) 375-5283



- *Please save this notice for your records. Please enclose a copy if you have to write us or a U. S. Consulate about this case, or if you file another application based on this decision.*
- *You will be notified separately about any other applications or petitions you have filed.*

---

### **Additional Information**

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#### **APPROVAL OF AN IMMIGRANT PETITION.**

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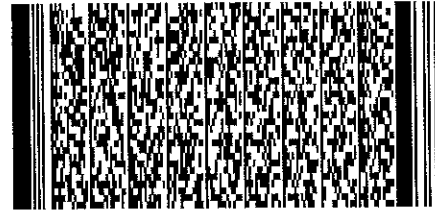
In addition to the information on the reverse of this notice, the instructions for the petition you filed provide additional information about processing after approval of the petition.

For more information about whether a person who is already in the U.S. can apply for adjustment of status, please see Form I-485, *Application to Register Permanent Residence or Adjust Status*.

**THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.**

<b>ASC Appointment Notice</b>		APPLICATION/PETITION/REQUEST NUMBER LIN1590229291 - LIN1590229292		NOTICE DATE 11/21/2014
CASE TYPE I821D - I765	SOCIAL SECURITY NUMBER	USCIS A#	CODE 3	
ACCOUNT NUMBER	TCR	SERVICE CENTER NSC	PAGE 1 of 1	

MIRIAM BERENICE GONZALEZ AVILA



To process your request, U. S. Citizenship & Immigration Services (USCIS) must capture your biometrics.  
**PLEASE APPEAR AT THE BELOW APPLICATION SUPPORT CENTER AT THE DATE AND TIME SPECIFIED.**  
**IF YOU FAIL TO APPEAR AS SCHEDULED, YOUR REQUEST WILL BE CONSIDERED ABANDONED.**

**APPLICATION SUPPORT CENTER**  
USCIS WILSHIRE  
1015 WILSHIRE BOULEVARD 1ST FLOOR, SUITE 100  
LOS ANGELES CA 90017

**PLEASE READ THIS ENTIRE NOTICE CAREFULLY.**  
**DATE AND TIME OF APPOINTMENT**  
12/09/2014  
09:00AM

**WHEN YOU GO TO THE APPLICATION SUPPORT CENTER TO HAVE YOUR BIOMETRICS TAKEN, YOU MUST BRING:**

- 1. THIS APPOINTMENT NOTICE** and
- 2. PHOTO IDENTIFICATION.** Requestors must bring their Permanent Resident Card/Resident Alien Card, or a passport, driver's license, national ID, military ID, or State-issued photo ID. If you appear without proper identification, your biometrics may not be taken.

**CELL PHONES, CAMERAS, OR OTHER RECORDING DEVICES ARE NOT PERMITTED.**

**REQUEST FOR RESCHEDULING**

**Please reschedule my appointment.** Once USCIS receives your request, you will be sent a new appointment notice. Make a copy of this notice for your records, then mail the original with your request to BPU, Alexandria ASC, Suite 100, 8850 Richmond Hwy, Alexandria, VA 22309-1586

BIOMETRICS PROCESSING STAMP  
ASC SITE CODE  
BIOMETRICS QA REVIEW BY  
914672 ON  
914672 ON  
DEC 09 2014  
DEC 09 2014

APPLICATION NUMBER  
I821D - LIN1590229291



APPLICATION NUMBER 2  
I765 - LIN1590229292



If you have any questions regarding this notice, please call 1-800-375-5283.

**WARNING:** Due to limited seating availability in our lobby area, only persons who are necessary to assist with transportation or completing the biometrics worksheet should accompany you. If you have open wounds or bandages/casts when you appear, the USCIS may reschedule your appointment if it is determined your injuries will interfere with taking your biometrics.

If you are visiting a field office and need directions, including public transportation directions, please see [www.uscis.gov/fieldoffices](http://www.uscis.gov/fieldoffices) for more information.

### Notice for Customers with Disabilities

USCIS is committed to providing customers with disabilities the same level of access to its programs and activities that customers without disabilities have (see the USCIS Web site for an explanation and examples of accommodations). If you need an accommodation for your appointment due to a disability that affects your access to a USCIS program or activity OR if a disability prevents you from going to the designated USCIS location for your appointment, please call the National Customer Service Center (NCSC) at 1-800-375-5283 (TTY: 1-800-767-1833) to request an accommodation.

**Call the NCSC even if you indicated on your application or petition that you require an accommodation. Also, you must contact the NCSC to request an accommodation each time you have an appointment with USCIS.** For example, you must call the NCSC to request an accommodation for your biometrics appointment and again for an accommodation for your interview appointment.

**NOTICE:** All domestic USCIS offices are accessible to individuals with physical disabilities. You do not need to request an accommodation if your **ONLY** need is an accommodation that would enable or facilitate you having physical access to a domestic USCIS office.

**NOTE:** Naturalization applicants should **not** call the NCSC to request an exception from the English and/or civics testing requirement. You **must** submit Form N-648, Medical Certification for Disability Exceptions to request an exception. See the form instructions for additional information.

**THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.**

NOTICE TYPE Receipt		NOTICE DATE November 17, 2014
CASE TYPE I-765, Application for Employment Authorization		USCIS ALIEN NUMBER [REDACTED]
RECEIPT NUMBER LIN1590229292	RECEIVED DATE November 13, 2014	PAGE 1 of 1
		DATE OF BIRTH [REDACTED]

MIRIAM B. GONZALEZ AVILA

17 4976



**NAME AND MAILING ADDRESS**

**PAYMENT INFORMATION:**

Application/Petition Fee: \$465.00  
Biometrics Fee: \$0.00  
Total Amount Received: \$465.00  
Total Balance Due: \$0.00

Full and complete payment has been received on the above application. **Please notify us immediately if any of the above information is incorrect.** If you find it necessary to contact this office in writing, you must include a copy of this receipt notice with your inquiry.

**BIOMETRICS -**

The next step is to have your biometrics taken at a USCIS Application Support Center (ASC). You will receive a notice in the mail regarding when USCIS has scheduled you for your ASC appointment.

If you have questions about possible immigration benefits and services, filing information, or USCIS forms, please call the USCIS National Customer Service Center (NCSC) at **1-800-375-5283**. If you are hearing impaired, please call the NCSC TDD at **1-800-767-1833**. Please also refer to the USCIS website: [www.uscis.gov](http://www.uscis.gov).

If you have any questions or comments regarding this notice or the status of your case, please contact our customer service number.

You will be notified separately about any other case you may have filed.

**USCIS Office Address:**

USCIS  
Nebraska Service Center  
P.O. Box 82521  
Lincoln, NE 68501-2521

**USCIS Customer Service Number:**

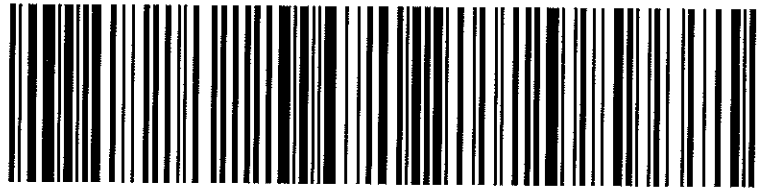
(800)375-5283



P.O. Box 10765  
Laguna Niguel, CA 92607-1076

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**ZIP – USPS DELIVERY CONFIRMATION**

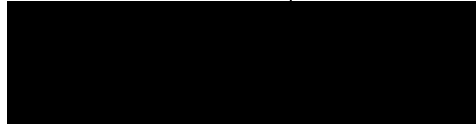


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USCIS National Customer Service Center  
1-800-375-5283

GONZALEZ AVILA, MIRIAM BERENICE

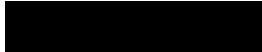


Date 3/22/2013

**IMPORTANT INFORMATION – SAVE THIS MAILER**

Use this section to speed your application for an extension or replacement card.

A#



GONZALEZ AVILA, MIRIAM BERENICE



RECEIPT # WAC1390253006



CARD # 1A091221986994



**Help USCIS Serve You Better**

We recommend you keep this notice in a safe place for your future reference. It shows your USCIS "A" or "N" number, which is your USCIS account and file number, and it also has other important information.

The tear-off portion of this mailer can also help speed your later application for another card. When you file for another card, we recommend you attach the tear-off portion to your completed application.





# U.S. Citizenship and Immigration Services

## Your Application Has Been Approved.

Here is your new card. The expiration date is shown on the front.

## Please Check Your Card To Verify That the Information Is Correct.

If you find an error on it, please call us at the telephone number provided below.

## Please Protect Your Card.

## Please Read This Notice.

It has important information. We also recommend that you keep this notice for your records.

If you ever have questions about immigration benefits and procedures, or wish to have an application mailed to you, please call our USCIS National Customer Service Center at **1-800-375-5283**, or Check our website at <http://www.uscis.gov>.

USCIS has a guide for new Permanent Residents called *Welcome to the United States: A Guide for New Immigrants*. It has important information about your rights and responsibilities. The guide is available in English and 13 other languages at <http://www.uscis.gov/newimmigrants>

## Additional Information About Your Card

USCIS issues several kinds of cards for different purposes. Please read how to use your card. Always carry your card in the United States and show it when you re-enter the United States. Please keep this information for your future reference.

### Permanent Resident Card

Your card has an expiration date.

- If you are a conditional resident, you should apply to remove the conditions 90 days before your card expires.
- If you are a permanent resident, the expiration date does not affect your status, but you should use form I-90 to apply for a new card 90 days before this card expires.

As a resident you should be aware of other immigration services:

- If your card is lost, stolen, or becomes damaged, or your name or other information shown on your card changes, use Form I-90 to apply for a new card.
- If you are going to travel and believe you may be gone a year or more, you should apply for a reentry permit *before you leave* - see Form I-131 for information.
- You can sponsor the immigration of certain relatives - see Form I-130 for information.
- Permanent residents can become American citizens. Usually, you have to be a permanent resident for 5 years, but in some circumstances you can apply earlier - see Form N-400 for information.

### Employment Authorization Card and Advance Parole Card

You are authorized to work consistent with any conditions shown on the card until it expires.

- If you apply for a job, you may show your card to the employer to show you are authorized to work while the card is *valid*.
- If you are already employed and this card extends your employment authorization, you may show this new card to your employer to show that your work authorization has been extended.

Your EAD card is also evidence of your status. Please see the enclosed important advisory.

### Replacement Citizen Card

Use your card as evidence of your U.S. Citizenship.

(This replacement card is only issued to certain American Indians and persons from the Northern Mariana Islands who were previously issued this kind of card.) You do not need to carry your card while in the United States.

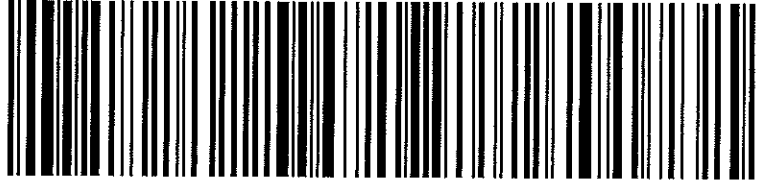
### Student/Exchange Visitor Card

Use your card to show that you are a valid F, J, or M nonimmigrant student, exchange visitor, or dependent. This card does not grant employment authorization. To apply for employment authorization, use Form I-765.

P.O. Box 82521  
Lincoln, NE 68501-2521

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**ZIP – USPS DELIVERY CONFIRMATION**



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USCIS National Customer Service Center  
1-800-375-5283

GONZALEZ AVILA, MIRIAM BERENICE



Date 3/25/2015

**IMPORTANT INFORMATION – SAVE THIS NOTICE**

Use this tear-off portion to speed your application for an extension or replacement card.

A#

GONZALEZ AVILA, MIRIAM BERENICE



RECEIPT # LIN1590229292



CARD # 1A091425079945



**Help USCIS Serve You Better**

We recommend that you keep this notice for your records. It has important information.

The tear-off portion of this notice can help speed your application for an extension or replacement card. When you file for another card, we recommend you attach the tear-off portion to your completed application.



U.S. Citizenship  
and Immigration  
Services

**Please Read This Notice.** It has important information. We also recommend that you keep this notice for your records.

### Your Application Has Been Approved.

Here is your new card. The expiration date is shown on the front.

### Please Check Your Card to Verify That the Information Is Correct.

If any information on this card is missing or incorrect, please call the National Customer Service Center at 1-800-375-5283 or check our Website at [www.uscis.gov](http://www.uscis.gov) for instructions.

### Please Protect Your Card.

### Additional Information About Your Card

U.S. Citizenship and Immigration Services (USCIS) issues several kinds of cards for different purposes. Please read the information in this notice on how to use your card. If you are 18 years of age or older, you are required to carry your Employment Authorization Document or Permanent Resident Card or other proof of alien registration in the United States with you at all times so it is available when needed. If you received a Permanent Resident Card or Combination Employment Authorization and Advance Parole Card (combo card), you should take it with you when you travel outside the United States so you can show it to a Customs and Border Protection (CBP) Officer upon your return to a U.S. port of entry. If you forget to take your card or lose it while traveling outside the United States, contact the nearest U.S. Embassy or consulate for travel assistance.

### Permanent Resident Card

Your card has an expiration date.

- If you are a conditional resident, you should apply to remove the conditions 90 days before your card expires.
- If you are a permanent resident, the expiration date does not affect your status, but you should use Form I-90, Application to Replace Permanent Resident Card, to apply for a new card as early as 6 months before your card expires.

As a permanent resident, you should be aware that:

- If your card is lost, stolen, or becomes damaged, or your name or other information shown on your card changes, use Form I-90 to apply for a new card.
- If you are going to travel and believe you may be outside of the United State for a year or more, you should apply for a reentry permit. You must be physically present in the United States when you file the reentry permit application and complete the biometrics services requirement. See Form I-131, Application for Travel Document, for information.
- You can sponsor the immigration of certain relatives. See Form I-130, Petition for Alien Relative, for information.
- Permanent residents can apply to become American citizens after a certain period of residence in the United States. Usually, you have to be a permanent resident for 5 years, but in some circumstances you can apply earlier. See Form M-476, A Guide to Naturalization, or visit the Citizenship Resource Center at [www.uscis.gov/citizenship](http://www.uscis.gov/citizenship).

USCIS has a guide for new permanent residents called "Welcome to the United States: A Guide for New Immigrants." It has important information about your rights and responsibilities. The guide is available at [www.uscis.gov/newimmigrants](http://www.uscis.gov/newimmigrants) in English and a variety of languages.

### Employment Authorization Document (EAD)

You are authorized to work consistent with any conditions shown on the card until it expires.

- If you apply for a job, you may show your card to the employer to show that you are authorized to work while the card is valid. Employers may accept the new card as a List A document when completing the Employment Eligibility Verification (Form I-9).
- If you are already employed and this card extends your employment authorization, you may show this new card to your employer to show that your work authorization has been extended.

Your EAD may also serve as evidence of your immigration status. In other cases, your EAD may show that you have a pending application for an immigration benefit that authorizes employment while the application is pending.

You may apply for a new EAD if your current card expires before USCIS makes a final decision on your: Form I-485, Application to Register Permanent Residence or Adjust Status; Form I-881, Application for Suspension of Deportation or Special Rule Cancellation of Removal; Form I-589, Application for Asylum and for Withholding of Removal; or other pending application that allows for employment while your application is pending. Please refer to the instructions for Form I-765, Application for Employment Authorization Document, at [www.uscis.gov](http://www.uscis.gov).

### Combination Employment Authorization and Advance Parole Card

Your Combination Employment Authorization and Advance Parole Card (combo card) serves as both an employment authorization document and an advance parole document while your Form I-485 is pending with USCIS. See the information above relating to employment authorization.

Your combo card also allows you to seek parole into the United States upon returning from travel outside of the United States. You should take your combo card with you when you travel outside the United States so you can present it to a CBP Officer at a U.S. port of entry to seek parole upon your return. Please see the instructions for Form I-131 and the enclosed Form I-931, which provide important additional information about using an advance parole document for travel.

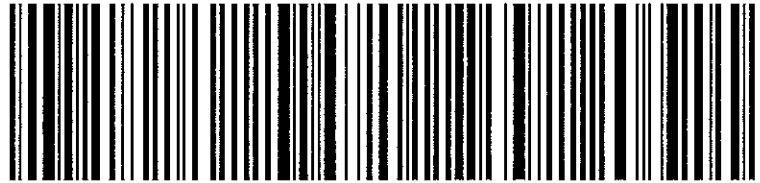
### Questions

If you ever have questions about immigration benefits and procedures or wish to have an application mailed to you, please call our National Customer Service Center at 1-800-375-5283 or check our Website at [www.uscis.gov](http://www.uscis.gov).

P.O. Box 82521  
Lincoln, NE 68501-2521

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USPS Tracking # eVS

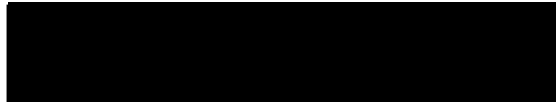


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USCIS National Customer Service Center  
1-800-375-5283

GONZALEZ AVILA, MIRIAM BERENICE



Date 12/16/2016

**IMPORTANT INFORMATION – SAVE THIS NOTICE**

Use this tear-off portion to speed your application for an extension or replacement card.

A#

GONZALEZ AVILA, MIRIAM BERENICE



RECEIPT # IOE0901426655



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\* 1 A 1 2 1 6 2 9 0 0 3 8 6 7 \*

CARD # 1A121629003867



\* 1 A 1 2 1 6 2 9 0 0 3 8 6 7 \*

**Help USCIS Serve You Better**

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**U.S. Citizenship  
and Immigration  
Services**

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## Please Protect Your Card.

### Additional Information About Your Card

U.S. Citizenship and Immigration Services (USCIS) issues several kinds of cards for different purposes. Please read the information in this notice on how to use your card. If you are 18 years of age or older, you are required to carry your Employment Authorization Document or Permanent Resident Card or other proof of alien registration in the United States with you at all times so it is available when needed. If you received a Permanent Resident Card or Combination Employment Authorization and Advance Parole Card (combo card), you should take it with you when you travel outside the United States so you can show it to a Customs and Border Protection (CBP) Officer upon your return to a U.S. port of entry. If you forget to take your card or lose it while traveling outside the United States, contact the nearest U.S. Embassy or consulate for travel assistance.

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- If you are a conditional resident, you should apply to remove the conditions 90 days before your card expires.
- If you are a permanent resident, the expiration date does not affect your status, but you should use Form I-90, Application to Replace Permanent Resident Card, to apply for a new card as early as 6 months before your card expires.

As a permanent resident, you should be aware that:

- If your card is lost, stolen, or becomes damaged, or your name or other information shown on your card changes, use Form I-90 to apply for a new card.
- If you are going to travel and believe you may be outside of the United State for a year or more, you should apply for a reentry permit. You must be physically present in the United States when you file the reentry permit application and complete the biometrics services requirement. See Form I-131, Application for Travel Document, for information.
- You can sponsor the immigration of certain relatives. See Form I-130, Petition for Alien Relative, for information.
- Permanent residents can apply to become American citizens after a certain period of residence in the United States. Usually, you have to be a permanent resident for 5 years, but in some circumstances you can apply earlier. See Form M-476, A Guide to Naturalization, or visit the Citizenship Resource Center at [www.uscis.gov/citizenship](http://www.uscis.gov/citizenship).

USCIS has a guide for new permanent residents called "Welcome to the United States: A Guide for New Immigrants." It has important information about your rights and responsibilities. The guide is available at [www.uscis.gov/newimmigrants](http://www.uscis.gov/newimmigrants) in English and a variety of languages.

### Employment Authorization Document (EAD)

You are authorized to work consistent with any conditions shown on the card until it expires.

- If you apply for a job, you may show your card to the employer to show that you are authorized to work while the card is valid. Employers may accept the new card as a List A document when completing the Employment Eligibility Verification (Form I-9).
- If you are already employed and this card extends your employment authorization, you may show this new card to your employer to show that your work authorization has been extended.

Your EAD may also serve as evidence of your immigration status. In other cases, your EAD may show that you have a pending application for an immigration benefit that authorizes employment while the application is pending.

You may apply for a new EAD if your current card expires before USCIS makes a final decision on your: Form I-485, Application to Register Permanent Residence or Adjust Status; Form I-881, Application for Suspension of Deportation or Special Rule Cancellation of Removal; Form I-589, Application for Asylum and for Withholding of Removal; or other pending application that allows for employment while your application is pending. Please refer to the instructions for Form I-765, Application for Employment Authorization Document, at [www.uscis.gov](http://www.uscis.gov).

### Combination Employment Authorization and Advance Parole Card

Your Combination Employment Authorization and Advance Parole Card (combo card) serves as both an employment authorization document and an advance parole document while your Form I-485 is pending with USCIS. See the information above relating to employment authorization.

Your combo card also allows you to seek parole into the United States upon returning from travel outside of the United States. You should take your combo card with you when you travel outside the United States so you can present it to a CBP Officer at a U.S. port of entry to seek parole upon your return. Please see the instructions for Form I-131 and the enclosed Form I-931, which provide important additional information about using an advance parole document for travel.

### Questions

If you ever have questions about immigration benefits and procedures or wish to have an application mailed to you, please call our National Customer Service Center at **1-800-375-5283** or check our Website at [www.uscis.gov](http://www.uscis.gov).

# EXHIBIT C



Receipt Number IOE0901426654	USCIS Account Number [REDACTED]	Case Type I821D - CONSIDERATION OF DEFERRED ACTION FOR CHILDHOOD ARRIVALS
Receipt Date 10/07/2016	Priority Date 10/05/2016	Applicant [REDACTED] MIRIAM BERENICE GONZALEZ AVILA
Notice Date 12/13/2016	Page 1 of 1	

GONZALEZ AVILA, MIRIAM BERENICE  
[REDACTED]

Notice Type: Approval Notice  
Valid from: 03/19/2017 to 03/18/2019

**Notice of Deferred Action:**

This notice is to inform you regarding U.S. Citizenship and Immigration Services's (USCIS) decision on your Form I-821D, Consideration of Deferred Action for Childhood Arrivals.

USCIS, in the exercise of its prosecutorial discretion, has decided to defer action in your case. Deferred action is an exercise of prosecutorial discretion by USCIS not to pursue the removal of an individual from the United States for a specific period. Deferred action does not confer or alter any immigration status.

Unless terminated, this decision to defer removal action will remain in effect for 2 years from the date of this notice.

This form does not constitute employment authorization, nor may it be used in place of an Employment Authorization Document. The 90-day period for reviewing Form I-765, Application for Employment Authorization, filed together with Form I-821D begins as of the date of this approval notice. If Form I-765 is granted, you will receive your Employment Authorization Document separately by mail. Subsequent criminal activity after your case has been deferred is likely to result in termination of your deferred action. This notice does not provide permission to travel outside of the United States.

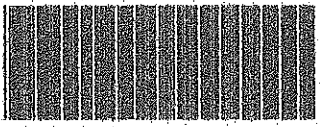
You are required to notify USCIS if you change your address. You may use the Alien's Change of Address Card, Form AR-11, to report a new address. That form may be found at [www.uscis.gov](http://www.uscis.gov). There is no fee for this change of address form.

**NOTICE:** USCIS and the U.S. Department of Homeland Security (DHS) reserve the right to verify the information submitted in this request and/or supporting documentation to ensure conformity with applicable laws, rules, regulations, and other authorities. Methods used for verifying information may include, but are not limited to, the review of public information and records, contact by correspondence, the internet, or telephone, and site inspections of businesses and residences. Information obtained during the course of the verification will be used to determine whether termination of deferred action and/or removal proceedings are appropriate if, for example, the requestor committed fraud or misrepresentation in his or her request for consideration of deferred action for childhood arrivals, or engaged in subsequent criminal activity following the submission of his or her request. Individuals for whom removal action is deferred under Deferred Action for Childhood Arrivals may, in the sole discretion of USCIS and DHS, be provided an opportunity to address derogatory information before deferred action is terminated and/or removal proceedings are initiated.

Please see the additional information on the back. You will be notified separately about any other cases you filed.

USCIS/Nebraska Service Center  
P.O. Box 82521  
Lincoln NE 68501-2521

Customer Service Telephone: 800-375-5283



- *Please save this notice for your records. Please enclose a copy if you have to write us or a U.S. Consulate about this case, or if you file another application based on this decision.*
- *You will be notified separately about any other applications or petitions you have filed.*

---

### ***Additional Information***

#### **GENERAL.**

The filing of an application or petition does not in itself allow a person to enter the United States and does not confer any other right or benefit.

#### **INQUIRIES.**

You should contact the office listed on the reverse side of this notice if you have questions about the notice, or questions about the status of your application or petition. *We recommend you call.* However, if you write us, please enclose a copy of this notice with your letter.

#### **APPROVAL OF NONIMMIGRANT PETITION.**

Approval of a nonimmigrant petition means that the person for whom it was filed has been found eligible for the requested classification. If this notice indicated we are notifying a U.S. Consulate about the approval for the purpose of visa issuance, and you or the person you filed for have questions about visa issuance, please contact the appropriate U.S. Consulate directly.

#### **APPROVAL OF AN IMMIGRANT PETITION.**

Approval of an immigrant petition does not convey any right or status. The approved petition simply establishes a basis upon which the person you filed for can apply for an immigrant or fiance(e) visa or for adjustment of status.

A person is not guaranteed issuance of a visa or a grant of adjustment simply because this petition is approved. Those processes look at additional criteria.

If this notice indicates we have approved the immigrant petition you filed, and have forwarded it to the Department of State Immigrant Visa Processing Center, that office will contact the person you filed the petition for directly with information about visa issuance.

In addition to the information on the reverse of this notice, the instructions for the petition you filed provide additional information about processing after approval of the petition.

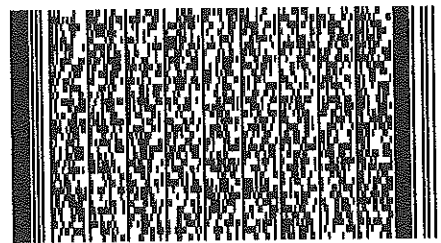
For more information about whether a person who is already in the U.S. can apply for adjustment of status, please see Form I-485, *Application to Register Permanent Residence or Adjust Status*.



**THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.**

<b>ASC Appointment Notice - APPLICANT COPY</b>		APPLICATION/PETITION/REQUEST NUMBER IOE0901426654 - IOE0901426655		NOTICE DATE 10/08/2016
CASE TYPE I821D - I765	SOCIAL SECURITY NUMBER	USCIS A#	CODE 3	
ACCOUNT NUMBER	TCR	SERVICE CENTER NSC	PAGE 1 of 1	

MIRIAM BERENICE GONZALEZ AVILA  
[REDACTED]



To process your request, U. S. Citizenship & Immigration Services (USCIS) must capture your biometrics.  
**PLEASE APPEAR AT THE BELOW APPLICATION SUPPORT CENTER AT THE DATE AND TIME SPECIFIED.**  
**IF YOU FAIL TO APPEAR AS SCHEDULED, YOUR REQUEST WILL BE CONSIDERED ABANDONED.**

APPLICATION SUPPORT CENTER USCIS WILSHIRE 1015 Wilshire Blvd 1st Fl, Suite 100 Los Angeles CA 90017	PLEASE READ THIS ENTIRE NOTICE CAREFULLY. DATE AND TIME OF APPOINTMENT 10/24/2016 11:00AM
--	--

**WHEN YOU GO TO THE APPLICATION SUPPORT CENTER TO HAVE YOUR BIOMETRICS TAKEN, YOU MUST BRING:**  
1. **THIS APPOINTMENT NOTICE** and  
2. **PHOTO IDENTIFICATION.** Requestors must bring their Permanent Resident Card/Resident Alien Card, or a passport, driver's license, national ID, military ID, or State-issued photo ID. If you appear without proper identification, your biometrics may not be taken.

**CELL PHONES, CAMERAS, OR OTHER RECORDING DEVICES ARE NOT PERMITTED.**

**NOTE:** USCIS will use your fingerprints to check the criminal history records of the FBI. You may obtain a copy of your own FBI identification record using the procedures outlined within Title 28 C.F.R., Section 16.32. The procedures to change, correct, or update your FBI identification record are outlined within Title 28, C.F.R., Section 16.34.

**NOTE:** If the USCIS ASC is closed due to inclement weather or for other unforeseen circumstances, USCIS will automatically reschedule your appointment for the next available appointment date and mail you a notice with the new date and time.

**REQUEST FOR RESCHEDULING**

**Please reschedule my appointment.** Once USCIS receives your request, you will be sent a new appointment notice. Make a copy of this notice for your records, then mail the original with your request to BPU, Alexandria ASC, Suite 100, 8850 Richmond Hwy, Alexandria, VA 22309-1586

BIOMETRICS PROCESSING STAMP  
ASC SITE CODE: \_\_\_\_\_  
BIOMETRICS QA REVIEW BY: LM  
912616 ON OCT 24 2016  
FINGERPRINTS QA REVIEW BY: \_\_\_\_\_  
912616 ON OCT 24 2016

APPLICATION NUMBER  
I821D - IOE0901426654

APPLICATION NUMBER 2  
I765 - IOE0901426655

If you have any questions regarding this notice, please call 1-800-375-5283.  
**WARNING:** Due to limited seating availability in our lobby area, only persons who are necessary to assist with transportation or completing the biometrics worksheet should accompany you. If you have open wounds or bandages/casts when you appear, the USCIS may reschedule your appointment if it is determined your injuries will interfere with taking your biometrics.

If you are visiting a field office and need directions, including public transportation directions, please see [www.uscis.gov/fieldoffices](http://www.uscis.gov/fieldoffices) for more information.

### Notice for Customers with Disabilities

USCIS is committed to providing customers with disabilities the same level of access to its programs and activities that customers without disabilities have (see the USCIS Web site for an explanation and examples of accommodations). If you need an accommodation for your appointment due to a disability that affects your access to a USCIS program or activity OR if a disability prevents you from going to the designated USCIS location for your appointment, please call the National Customer Service Center (NCSC) at 1-800-375-5283 (TTY: 1-800-767-1833) to request an accommodation.

**Call the NCSC even if you indicated on your application or petition that you require an accommodation. Also, you must contact the NCSC to request an accommodation each time you have an appointment with USCIS.** For example, you must call the NCSC to request an accommodation for your biometrics appointment and again for an accommodation for your interview appointment.

**NOTICE:** All domestic USCIS offices are accessible to individuals with physical disabilities. You do not need to request an accommodation if your **ONLY** need is an accommodation that would enable or facilitate you having physical access to a domestic USCIS office.

**NOTE:** Naturalization applicants should **not** call the NCSC to request an exception from the English and/or civics testing requirement. You **must** submit Form N-648, Medical Certification for Disability Exceptions to request an exception. See the form instructions for additional information.

**Applicant Information Worksheet**

**NOTICE**

The following applicant information needs to be provided so that the proper processing of the individual's biometrics can be made.

NAME: GONZALEZ AVILA MIRIAM BERENICE  
Last First Middle

DATE OF BIRTH: [REDACTED] PHONE #: [REDACTED]  
(Month) (Day) (Year)

COUNTRY OF BIRTH: MEXICO GENDER: (M)ale or (F)emale F

COUNTRY OF CITIZENSHIP: MEXICO RACE: Circle the most appropriate code below:  
 American Indian or Alaskan Native Black White / Hispanic Asian or Pacific Island Unknown

HEIGHT: 5 Feet 4 Inches WEIGHT: 160 Pounds

Circle Eye Color: Blue, Brown, Green, Gray, Hazel, Maroon, Pink, Unknown

Circle Hair Color: Bald, Black, Blonde, Brown, Gray, Red, Sandy, White, Unknown

USCIS A #: [REDACTED] Application Number(s): IOE 0901426654  
IOE 0901426655

(If no USCIS A #, use SSN.) \_\_\_\_\_

LIST ANY OTHER NAMES YOU HAVE USED: (Include maiden name, previous marriage, AKA, etc.)

1. GONZALEZ MIRIAM BERENICE  
Last First Middle
2. GONZALEZ MIRIAM  
Last First Middle
3. \_\_\_\_\_  
Last First Middle

When you have completed this worksheet, turn it into the receptionist. Have this worksheet, your appointment notification letter, and picture identification available.

**Upon completion of processing at the ASC, this form WILL BE RETURNED to the applicant.**

August 2015

**THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.**

NOTICE TYPE Receipt		NOTICE DATE October 07, 2016
CASE TYPE I-821D, Consideration of Deferred Action for Childhood Arrivals		USCIS ALIEN NUMBER [REDACTED]
RECEIPT NUMBER IOE0901426654	RECEIVED DATE October 06, 2016	PAGE 1 of 1
		DATE OF BIRTH [REDACTED]

MIRIAM B. GONZALEZ AVILA

6 00001396



NAME AND MAILING ADDRESS

The above case has been received by our office and is in process.

Please verify your personal information listed above and immediately notify the USCIS National Customer Service Center at the phone number listed below if there are any changes.

If you have questions about possible immigration benefits and services, filing information, or USCIS forms, please call the USCIS National Customer Service Center (NCSC) at 1-800-375-5283. If you are hearing impaired, please call the NCSC TDD at 1-800-767-1833. Please also refer to the USCIS website: [www.uscis.gov](http://www.uscis.gov).

If you have any questions or comments regarding this notice or the status of your case, please contact our customer service number.

You will be notified separately about any other case you may have filed.

USCIS Office Address:

USCIS  
Nebraska Service Center  
P.O. Box 82521  
Lincoln, NE 68501-2521

USCIS Customer Service Number:

(800)375-5283



0435

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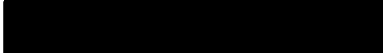
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**THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.**

NOTICE TYPE Receipt		NOTICE DATE October 07, 2016
CASE TYPE I-765, Application for Employment Authorization		USCIS ALIEN NUMBER [REDACTED]
RECEIPT NUMBER IOE0901426655	RECEIVED DATE October 06, 2016	PAGE 1 of 1
		DATE OF BIRTH [REDACTED]

MIRIAM B. GONZALEZ AVILA



6 00001397



**PAYMENT INFORMATION:**

Application/Petition Fee: \$465.00  
Biometrics Fee: \$0.00  
Total Amount Received: \$465.00  
Total Balance Due: \$0.00

**NAME AND MAILING ADDRESS**

Full and complete payment has been received on the above application. **Please notify us immediately if any of the above information is incorrect.** If you find it necessary to contact this office in writing, you must include a copy of this receipt notice with your inquiry.

**BIOMETRICS -**

The next step is to have your biometrics taken at a USCIS Application Support Center (ASC). You will receive a notice in the mail regarding when USCIS has scheduled you for your ASC appointment.

If you have questions about possible immigration benefits and services, filing information, or USCIS forms, please call the USCIS National Customer Service Center (NCSC) at **1-800-375-5283**. If you are hearing impaired, please call the NCSC TDD at **1-800-767-1833**. Please also refer to the USCIS website: [www.uscis.gov](http://www.uscis.gov).

If you have any questions or comments regarding this notice or the status of your case, please contact our customer service number.

You will be notified separately about any other case you may have filed.

**USCIS Office Address:**

USCIS  
Nebraska Service Center  
P.O. Box 82521  
Lincoln, NE 68501-2521

**USCIS Customer Service Number:**

(800)375-5283



0437

If you are visiting a field office and need directions, including public transportation directions, please see [www.uscis.gov/fieldoffices](http://www.uscis.gov/fieldoffices) for more information.

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Receipt Number IOE0901426654	USCIS Online Account Number [REDACTED]	Case Type I821D - CONSIDERATION OF DEFERRED ACTION FOR CHILDHOOD ARRIVALS
Receipt Date 10/07/2016	Priority Date 10/05/2016	Applicant [REDACTED] MIRIAM BERENICE GONZALEZ AVILA
Notice Date 10/24/2016	Page 1 of 1	

GONZALEZ AVILA, MIRIAM BERENICE  
[REDACTED]

**Notice Type:** USCIS Account Access Notice  
**Access Code:** 9B27F-3FC3-740D2

**Welcome to USCIS!**

Thank you for your recent benefit request submission. We have created a USCIS online account for you. With this account you can:

- check the status of your case.
- sign up to receive email notifications and text messages.
- manage your account preferences and contact information.

**Log on and confirm your account within 30 days.**

To access your account, please follow the steps below:

1. Visit us online at <https://myaccount.uscis.dhs.gov>
2. Select the "Create a New Account" icon on the upper right side of the screen, and follow the on-screen instructions for creating a new account in order to login to the system.
3. Under "Actions" (on the right), select "Enter Your Online Access Code (See Welcome to USCIS Account Access Notice)".
4. Enter your "Online Access Code" (found on the upper right side of this notice) and your "Date of Birth" in the fields provided. Then, select "Submit." If the information you entered is correct, you will return to the "Customer Home Page" and see a message indicating that you have successfully linked your case to your account. Information regarding your case will now appear at the lower left side of the application, under "Recent Cases."

**NOTE: Access to your USCIS Online Account will expire 30 days from the receipt date listed at the top of this letter. We will continue processing your application whether or not you access your USCIS Online Account. We strongly encourage you to confirm your USCIS Online Account as soon as possible and then use it in the future as your preferred method for interacting with USCIS.**

**Additional Information**

If you still have questions about how to confirm your USCIS Online Account or need technical support, please visit us online at <https://egov.uscis.gov/cris/contactus>

Please see the additional information on the back. You will be notified separately about any other cases you filed.

USCIS/Nebraska Service Center  
P.O. Box 82521  
Lincoln NE 68501-2521

Customer Service Telephone: 800-375-5283





If you are visiting a field office and need directions, including public transportation directions, please see [www.uscis.gov/fieldoffices](http://www.uscis.gov/fieldoffices) for more information.

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**THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.**

<b>RECEIPT NUMBER</b> LIN-15-902-29291		<b>CASE TYPE</b> I821D CONSIDERATION OF DEFERRED ACTION FOR CHILDHOOD ARRIVALS
<b>RECEIPT DATE</b> November 14, 2014	<b>PRIORITY DATE</b>	<b>APPLICANT</b> [REDACTED] GONZALEZ AVILA, MIRIAM B.
<b>NOTICE DATE</b> September 22, 2016	<b>PAGE</b> 1 of 1	
MIRIAM BERENICE GONZALEZ AVILA [REDACTED]		<b>Notice Type:</b> Notice of Action

IF YOU HAVE ALREADY SUBMITTED YOUR REQUEST TO RENEW DEFERRED ACTION UNDER DACA, PLEASE DISREGARD THIS NOTICE.

Our records indicate that U.S. Citizenship and Immigration Services (USCIS) granted DACA in your case and that your current period of deferred action will expire in less than 180 days. If you wish to avoid a lapse in your period of deferred action and employment authorization, you must file a DACA renewal request with USCIS between 150 days and 120 days before the expiration date located on your current Form I-797 DACA approval notice and Employment Authorization Document (EAD). Form I-821D, Consideration of Deferred Action for Childhood Arrivals, was recently updated to allow for renewal filings and is available online at <http://www.uscis.gov/i-821d>. This form must be completed, properly signed and accompanied by a Form I-765, Application for Employment Authorization, and Form I-765WS, I-765 Worksheet.

Please be aware that if your current period of deferred action expires before you receive a renewal of DACA, you will accrue unlawful presence and will not be authorized to work. If you have not already done so, USCIS encourages you to submit your renewal request as soon as possible.


Deferred action is a discretionary determination to defer removal action of an individual as an act of prosecutorial discretion and each case will be considered on an individual, case-by-case basis. USCIS will notify you of its decision in writing.

For additional information on DACA, including documentation requirements for renewal or to download the required forms, please visit [www.uscis.gov/childhoodarrivals](http://www.uscis.gov/childhoodarrivals). If you have already filed your renewal request with USCIS, please disregard this notice. You can check your case status online by visiting <https://egov.uscis.gov/cris/Dashboard.do>.

**THIS FORM IS NOT A VISA AND MAY NOT BE USED IN PLACE OF A VISA.**

Please see the additional information on the back. You will be notified separately about any other cases you filed.

NEBRASKA SERVICE CENTER  
U. S. CITIZENSHIP & IMMIG SERVICE  
P.O. BOX 82521  
LINCOLN NE 68501-2521  
Customer Service Telephone: 800-375-5283



If you are visiting a field office and need directions, including public transportation directions, please see [www.uscis.gov/fieldoffices](http://www.uscis.gov/fieldoffices) for more information.

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# **EXHIBIT 33**

1 JEFFREY M. DAVIDSON (SBN 248620)  
ALAN BERSIN (SBN 63874)  
2 COVINGTON & BURLING LLP  
One Front Street, 35th Floor  
3 San Francisco, CA 94111-5356  
Telephone: (415) 591-6000  
4 Facsimile: (415) 591-6091  
Email: jdavids@cov.com,  
5 abersin@cov.com  
*Attorneys for Plaintiffs The Regents of the  
6 University of California and Janet Napolitano, in  
her official capacity as President of the  
7 University of California*

8 THEODORE J. BOUTROUS, JR. (SBN 132099)  
ETHAN D. DETTMER (SBN 196046)  
9 JESSE S. GABRIEL (SBN 263137)  
GIBSON, DUNN & CRUTCHER LLP  
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18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SAN FRANCISCO DIVISION**

21 THE REGENTS OF THE UNIVERSITY OF  
CALIFORNIA and JANET NAPOLITANO,  
in her official capacity as President of the  
22 University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND  
SECURITY and ELAINE DUKE, in her  
26 official capacity as Acting Secretary of the  
Department of Homeland Security,

27 Defendants.  
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CASE NO. 17-CV-05211-WHA

**DECLARATION OF DELLARA GORJIAN**

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,  
  
Plaintiffs,  
  
v.  
  
U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,  
  
Plaintiffs,  
  
v.  
  
UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,  
  
Defendants.

CASE NO. 17-CV-05380-WHA

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<p>COUNTY OF SANTA CLARA and SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 521,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>DONALD J. TRUMP, in his official capacity as President of the United States, JEFFERSON BEAUREGARD SESSIONS, in his official capacity as Attorney General of the United States; ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security; and U.S. DEPARTMENT OF HOMELAND SECURITY,</p> <p style="text-align: center;">Defendants.</p>
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CASE NO. 17-CV-05813-WHA

1 I, DELLARA GORJIAN, DECLARE:

2 1. I am an immigrant to the United States. I was born in Canada and I am a Deferred Action  
3 for Childhood Arrivals (“DACA”) recipient. The matters set forth herein are true and correct of my own  
4 personal knowledge and, if called as a witness, I could and would testify competently thereto.

5 2. I came to the United States at the age of five, in 1999. I am now 23 years old and a first  
6 year law student at University of California, Los Angeles (“UCLA”).

7 3. I grew up in Irvine, California and attended school there from kindergarten through high  
8 school. My parents were undocumented immigrants when I was growing up. My mom worked as a  
9 hairdresser and my dad as a construction worker during my childhood. My parents have worked hard all  
10 their lives and sacrificed just to support my sister and me. They have no assets or savings to speak of. I  
11 have seen firsthand how much they have sacrificed in order to provide us with the opportunities that  
12 exist in America.

13 4. As a child, I remember being concerned about my immigration status and whether it  
14 would prevent me from pursuing certain dreams. I wanted to know if my lack of U.S. citizenship would  
15 prevent me from doing some of the activities I really enjoyed, like auditioning for a certain acting role or  
16 entering a singing competition. As I got older, I recall worrying about whether I could do the basic  
17 things my friends were doing as teenagers, like applying for a driver’s license or getting a summer job.  
18 But I was not allowed to participate in family conversations between my parents and older sister about  
19 my immigration status and what it meant. My parents would always change the subject or promise to  
20 talk about whether I could do all those things “soon.”

21 5. As a high school student, I was uncertain about the opportunities that were available to  
22 me as an undocumented person. I did not know whether college was an option. I assumed that high  
23 school would be the end of my academic career, so I did not apply myself academically and I graduated  
24 with a 2.95 GPA.

25 6. Eventually, I ended up enrolling in Irvine Valley College, a community college, in the  
26 fall of 2012. I learned about the DACA policy around the same time. I was instantly intrigued. DACA  
27 status appealed to me as a way that I could work to support myself and lessen the financial burden on  
28 my parents, and I was also excited about being able to get a driver’s license. I was motivated by these



1 ideas of independence and being able to help my family, so I applied for DACA status. I was initially  
2 granted DACA status, including a work authorization, in October 2012. I have since renewed twice, in  
3 the fall of 2014 and again in the fall of 2016.

4 7. For me, the most significant impact of obtaining DACA has been the academic doors it  
5 opened. It not only created previously unavailable opportunities for me to continue in school, it also  
6 gave me the motivation to apply myself and succeed in ways I had never thought possible before. When  
7 I was growing up, I thought I wanted to be a singer. It seemed like a path that was available to me, in  
8 which my undocumented status might not be as big of a barrier to success. When I received DACA, I  
9 had a newfound drive to go further in school and to support my family.

10 8. One of my first classes after getting DACA status was a communications and speech  
11 class. I committed myself to that class in a way I never would have before I received DACA. The  
12 teacher was the head of the speech and debate team and was impressed with my speaking and  
13 presentation abilities. He recruited me to join the speech and debate team. I was named captain during  
14 my freshman year. I led the team to two consecutive state championships and two national  
15 championships. I also won a top individual speaker award at a national-level Model United Nations  
16 conference.

17 9. All in all, my first years after receiving DACA status were a transformative time for me. I  
18 had debating success. My grades were excellent. I learned what could happen if I applied myself  
19 academically. I suddenly had the encouragement of my professors, who encouraged me to see myself as  
20 someone who could be a lawyer. This type of profession was never something I had considered to be  
21 available to me growing up as an undocumented person.

22 10. With newfound academic aspirations, I began considering schools to transfer to. I wanted  
23 to obtain a bachelor's degree from a 4-year college to continue my journey of becoming a lawyer. As a  
24 DACA status student, I could not obtain federal loans, so I limited my search to affordable local schools.  
25 I decided to attend California State University, Long Beach ("CSULB") so that I could minimize the  
26 cost of my education and stay close to family. It also seemed like a school where I would be welcomed  
27 as a DACA status student. I enrolled in a Political Science program at CSULB.

28

1           11. Upper-level courses intimidated me at first. I was the first person in my immediate family  
2 to go to a 4-year college. I lacked a network of people who could tell me how to navigate this academic  
3 environment and the rigors of upper-level political science courses. Nevertheless, I succeeded. The  
4 encouragement of professors and my 4.0 GPA after my first term at CSULB made it clear to me that I  
5 was on the right path. I was sure I could make it into a good law school if I kept trying. Without my  
6 DACA status, I would not have aspired to attend law school.

7           12. My DACA work authorization allowed me to work and provide for myself throughout  
8 college. In community college, I worked as a bank teller and then later as an executive assistant at a  
9 manufacturing company. At CSULB, with my eyes set on law school, I used my DACA work  
10 authorization to obtain a position as a legal assistant at a law firm in Century City. I even worked full  
11 time during all of my last semester. I graduated with my B.A. in Political Science from CSULB in 2016.

12           13. My parents became United States citizens just recently, in April 2015. Although they  
13 tried to get lawful permanent resident status for me before that (while they were still lawful permanent  
14 residents themselves), I turned 21 while the application was pending. I understand that this changed my  
15 preference category, such that it will likely be many years before I could even file a full application to  
16 become a lawful permanent resident. After that, it would take even more time for the application to be  
17 considered. The timeframe is too long and uncertain for me to depend on it.

18           14. In 2016, I applied to law school. I was admitted to several schools. When it came down to  
19 it, I wanted to stay close to my family and I felt safe in California. I chose UCLA and started just this  
20 fall as a first year law student. Law school is incredibly important to me. I want to prove that I can do  
21 what I never thought was academically possible before, and I want to advocate for others someday. I  
22 also want to be able to help my parents financially as they grow older and law school seemed like a  
23 reliable way to achieve that.

24           15. I would like to work at a large law firm when I graduate, and I know many UCLA law  
25 school graduates do that. With the rescission of the DACA policy in September 2017, the promising  
26 career paths law school was supposed to open the door to seem suddenly closed off again. My current  
27 DACA status will expire in October 2018. This is just weeks into my second year of law school, and  
28 right around the time when I will be trying to secure a second year summer associate position at a law

1 firm. I am concerned about how the DACA policy rescission will affect my ability to secure a summer  
2 associate position. I know securing a second-year summer associate position is a crucial step to securing  
3 a first-year associate position at a law firm, which is important to my long-term plan of becoming a  
4 lawyer.

5 16. The expiration of my DACA status and employment authorization will make it  
6 impossible for me to work as a law firm associate in the U.S. as I had planned. If I am able to graduate  
7 without DACA status, I expect to have about \$90,000 in private debt. This is in part because I am not  
8 eligible for federal financial aid as a DACA student. I never would have saddled myself with tens of  
9 thousands of dollars in student loans like this if I knew that my DACA status, and with it my  
10 employment status, would end. I went to law school expecting that a large law firm job and the  
11 significant salary that comes with it were real possibilities. Now, I will not be able to earn a salary that is  
12 commensurate with my education level and the significant debt I will have incurred from law school. I  
13 am worried that my credit history will be destroyed because I will not be able to pay this debt.

14 17. At the moment I am ten weeks into my first term of law school. Between reading for  
15 class and writing my graded memo, I have plenty to worry about aside from the looming and unexpected  
16 expiration of my DACA status. I have renewed my DACA status multiple times in the past without any  
17 issues, and I thought I would be able to do so again. I am trying to block the potential loss of my DACA  
18 status out of my mind and focus on school as best as I can. I want to make sure that I get good grades so  
19 that, if I can keep my DACA status, I will still have the same opportunities available to me after law  
20 school that I expected when I decided to attend. I am trying not to let the potential loss of my DACA  
21 status derail everything that I—and my family—worked so hard for, but it is a very difficult time for me.  
22 I am scared that without DACA my future is no longer as bright and certain as I had hoped and planned  
23 for.

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

26 Executed on October 28, 2017 in Los Angeles, California.

27   
28 DELLARA GORJIAN

# **EXHIBIT 34**

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

20 THE REGENTS OF THE UNIVERSITY OF  
21 CALIFORNIA and JANET NAPOLITANO,  
22 in her official capacity as President of the  
23 University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND  
26 SECURITY and ELAINE DUKE, in her  
27 official capacity as Acting Secretary of the  
28 Department of Homeland Security,

Defendants.

STATE OF CALIFORNIA, STATE OF

CASE NO. 17-CV-05211-WHA

**DECLARATION OF ITZEL GUILLEN**

CASE NO. 17-CV-05235-WHA

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MAINE, STATE OF MARYLAND, and  
STATE OF MINNESOTA,  
  
Plaintiffs,  
  
v.  
  
U.S. DEPARTMENT OF HOMELAND  
SECURITY, ELAINE DUKE, in her official  
capacity as Acting Secretary of the Department  
of Homeland Security, and the UNITED  
STATES OF AMERICA,  
  
Defendants.

CITY OF SAN JOSE, a municipal corporation,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, President of the United  
States, in his official capacity, ELAINE C.  
DUKE, in her official capacity, and the  
UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ  
AVILA, SAUL JIMENEZ SUAREZ,  
VIRIDIANA CHABOLLA MENDOZA,  
NORMA RAMIREZ, and JIRAYUT  
LATTHIVONGSKORN,  
  
Plaintiffs,  
  
v.  
  
UNITED STATES OF AMERICA, DONALD  
J. TRUMP, in his official capacity as President  
of the United States, U.S. DEPARTMENT OF  
HOMELAND SECURITY, and ELAINE  
DUKE, in her official capacity as Acting  
Secretary of Homeland Security,  
  
Defendants.

CASE NO. 17-CV-05380-WHA

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COUNTY OF SANTA CLARA and  
SERVICE EMPLOYEES INTERNATIONAL  
UNION LOCAL 521,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, in his official capacity  
as President of the United States, JEFFERSON  
BEAUREGARD SESSIONS, in his official  
capacity as Attorney General of the United  
States; ELAINE DUKE, in her official  
capacity as Acting Secretary of the Department  
of Homeland Security; and U.S.  
DEPARTMENT OF HOMELAND  
SECURITY,  
  
Defendants.

CASE NO. 17-CV-05813-WHA

**DECLARATION OF ITZEL GUILLEN**

I, ITZEL GUILLEN, declare as follows:

1. I am the Immigrant Integration Manager at Equality Alliance of San Diego County (commonly known as Alliance San Diego). In this role, I recruit, organize and mobilize private bar attorneys to volunteer their time in community events. I have personal knowledge of the facts set forth in this declaration, and if called as a witness, I could and would competently testify to them.

2. Alliance San Diego was founded in 2007 to change marginalizing policies and create a San Diego where all people can achieve their full potential in an environment of harmony, safety, equality and justice. Alliance San Diego’s mission is to empower diverse people and organizations to engage more effectively in our communities and civic process to create a San Diego where all people can achieve their full potential. The organization does local work of national significance in the fields of civic engagement, human rights, educational equity, and tax and fiscal policy. Every day we identify policy solutions, building coalitions, preparing leaders, and mobilizing people for change.

3. Alliance San Diego works to ensure that all immigrant families have the tools that they need in order to succeed. We offer informational forums with the latest in immigrant news, free immigration consultations throughout San Diego county, free application assistance for naturalization, and resources to find trusted legal help.

4. I have come to know Dulce Garcia through her volunteer work with Alliance San Diego. Dulce started to volunteer with us in the wake of the presidential election results in 2016. Dulce told me that she previously volunteered with the Immigrant Lawyers Acting in the Community (ILAC), which is led by immigration attorney Ginger Jacobs, a long-time colleague and friend of Alliance San Diego. Alliance San Diego sent out requests for volunteer attorneys through ILAC and Dulce responded to one of these requests, which is how she got involved with our organization.

5. Dulce has presented at more than fifteen Know Your Rights (“KYR”) forums sponsored by Alliance San Diego in San Diego County in 2017—which has amounted to more than 50 volunteer hours. KYR informational forums are two-hour-long presentations, often lead by immigration attorneys with the support of Alliance San Diego staff. The presentations vary in topics, including recent executive orders, DACA, naturalization, other forms of immigration relief, fraud prevention, and family



1 preparedness planning. These presentations are offered in various locations, including schools,  
2 colleges, community centers, labor organizations, and other community based organizations. On  
3 average, about 12–15 community members attend each session. At the end of the presentation,  
4 community members can ask questions to the immigration attorneys.

5 6. I have witnessed Dulce go above and beyond what is expected of volunteer attorneys and  
6 grow tremendously from the first time she led a KYR forum. Dulce is usually one of the first attorneys  
7 to respond to requests to volunteer and always remains after the forums to talk to everyone who has  
8 questions. With the information that Dulce provides through these forums, individuals in our  
9 community are better-prepared in case of an immigration related emergency and are also armed with the  
10 tools and resources needed to live a safer and more informed day-to-day life. Alliance San Diego has  
11 received very positive feedback from KYR participants regarding Dulce’s presentations. Participants  
12 expressed deep gratitude for Dulce’s willingness to stay after the forums to speak with them.

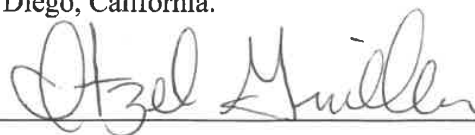
13 7. Through her volunteer work with Alliance San Diego, I have seen Dulce become a  
14 passionate advocate for immigrant rights and an active spokesperson for DACA. Because she is willing  
15 to share own experiences as an immigrant and DACA recipient, she can relate to and better serve  
16 Alliance San Diego’s constituents.

17 8. I am also a DACA recipient and I feel absolutely devastated about the sudden rescission  
18 of DACA. Knowing that I may be at risk of deportation has created deep uncertainty and anxiety for me  
19 and my family. Because these issues affect me personally, I especially admire Dulce for all the work  
20 she does to advocate for immigrant rights.

21 9. Like others I have come to know through Alliance San Diego, DACA has enabled Dulce  
22 to come out of the shadows and to become a leader in our community and to offer her skills and  
23 expertise to the members of the community who are desperately in need of that assistance.

24 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
25 true and correct.

26 Executed on October 27, 2017, in San Diego, California.

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DECLARATION OF ITZEL GUILLEN

All DACA Cases (Nos. 17-5211, 17-5235, 17-5329, 17-5380, 17-5813)

ITZEL GUILLEN

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# **EXHIBIT 35**

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18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SAN FRANCISCO DIVISION**

21 THE REGENTS OF THE UNIVERSITY OF  
CALIFORNIA and JANET NAPOLITANO,  
22 in her official capacity as President of the  
University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND  
SECURITY and ELAINE DUKE, in her  
26 official capacity as Acting Secretary of the  
Department of Homeland Security,

27 Defendants.  
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CASE NO. 17-CV-05211-WHA

**DECLARATION OF ELIZABETH  
HADAWAY**

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,  
  
Plaintiffs,  
  
v.  
  
U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,  
  
Plaintiffs,  
  
v.  
  
UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,  
  
Defendants.

CASE NO. 17-CV-05380-WHA

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COUNTY OF SANTA CLARA and  
SERVICE EMPLOYEES INTERNATIONAL  
UNION LOCAL 521,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, in his official capacity  
as President of the United States, JEFFERSON  
BEAUREGARD SESSIONS, in his official  
capacity as Attorney General of the United  
States; ELAINE DUKE, in her official  
capacity as Acting Secretary of the Department  
of Homeland Security; and U.S.  
DEPARTMENT OF HOMELAND  
SECURITY,  
  
Defendants.

CASE NO. 17-CV-05813-WHA

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**DECLARATION OF ELIZABETH HADAWAY**

I, ELIZABETH HADAWAY, declare as follows:

1. I am a Skadden Fellow with Opportunity Under Law (OUL) at Public Counsel. Founded in 1970, Public Counsel is the Nation’s largest not-for profit law firm specializing in delivering pro bono legal services. Public Counsel provides quality legal representation to those without access to it, such as disadvantaged children, immigrants who have been the victims of torture, persecution, domestic violence, trafficking, and other crimes, as well as individuals and institutions in underserved communities.

2. I graduated from Harvard Law School in 2015. After law school, I clerked for Judge Sandra Lynch on the United States Court of Appeals for the First Circuit. Since September 2016, I have been working at Public Counsel on a Skadden Fellowship. I am a member in good standing of the California Bar. I have personal knowledge of the facts set forth in this declaration, and if called as a witness, I could and would competently testify to them.

3. I met Viridiana Chabolla (Viri) in May 2014, when I was a summer intern in OUL and Viri was a community organizer in OUL. In September 2016, I returned to OUL as a Skadden Fellow and again had the pleasure of working with Viri. While at Public Counsel, Viri worked closely with several other lawyers, one other community organizer, and me to develop and pursue innovative education equity and civil rights litigation.

4. Viri is a great teacher. When I first started at Public Counsel, Viri took the time to teach me about her city and introduce me to the Los Angeles social justice community. For example, on car rides to meet with clients, she explained the social justice history of Los Angeles, and we would discuss how a particular school’s history might influence the dynamics of fact development in a particular area or on a particular issue. It was clear that Viri experienced Los Angeles as her home and was deeply connected to the community.

5. She also helped me develop community organizing skills, such as how to ask questions for declaration collecting in a way that helps clients share their stories. She introduced me to many of our partner organizations. And she taught me the importance of critically thinking about and reflecting on every step of our campaign work.





# **EXHIBIT 36**

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

20 THE REGENTS OF THE UNIVERSITY OF  
21 CALIFORNIA and JANET NAPOLITANO,  
22 in her official capacity as President of the  
23 University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND  
26 SECURITY and ELAINE DUKE, in her  
27 official capacity as Acting Secretary of the  
28 Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

**DECLARATION OF JENS HAINMUELLER  
AND DUNCAN LAWRENCE**

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,  
  
Plaintiffs,  
  
v.  
  
U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,  
  
Plaintiffs,  
  
v.  
  
UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,  
  
Defendants.

CASE NO. 17-CV-05380-WHA

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<p>COUNTY OF SANTA CLARA and SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 521,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>DONALD J. TRUMP, in his official capacity as President of the United States, JEFFERSON BEAUREGARD SESSIONS, in his official capacity as Attorney General of the United States; ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security; and U.S. DEPARTMENT OF HOMELAND SECURITY,</p> <p style="text-align: center;">Defendants.</p>
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CASE NO. 17-CV-05813-WHA

1 We, Jens Hainmueller and Duncan Lawrence, declare and state as follows:

2 1. Jens Hainmueller is a Professor of Political Science and Faculty Co-director of the  
3 Immigration Policy Lab (“IPL”) at Stanford University, Stanford, California. Duncan Lawrence is the  
4 Executive Director of IPL. We write this declaration in our personal capacity as experts in support of  
5 all Plaintiffs in the related lawsuits regarding the Deferred Action for Childhood Arrivals program,  
6 commonly known as DACA.

7 a. Jens Hainmueller is a Professor of Political Science at Stanford University and is  
8 the Co-founder and Faculty Co-director of IPL. Mr. Hainmueller received his  
9 PhD from Harvard University and also studied at the London School of  
10 Economics, Brown University, and the University of Tübingen. Before joining  
11 Stanford, he served on the faculty of the Massachusetts Institute of Technology.  
12 He has published more than 40 articles in peer-reviewed journals. A copy of his  
13 curriculum vitae is attached (Exhibit A).

14 b. Duncan Lawrence is the Executive Director of IPL. Mr. Lawrence received his  
15 PhD in political science from the University of Colorado Boulder, and has  
16 published several peer-reviewed articles on immigration. A copy of his  
17 curriculum vitae is attached (Exhibit B).

18 2. In 2017, we (along with other colleagues) co-authored a peer-reviewed study about the  
19 intergenerational effects of parental immigration status on children’s health. This study was  
20 published in *Science*, and a copy is attached to this declaration (Exhibit C).

21 3. Our study focused on the Deferred Action Deferred Action for Childhood Arrivals  
22 (DACA) program, which is one of the most extensive policies directed toward unauthorized  
23 immigrants in recent decades. It builds on prior studies that have found that DACA is related to  
24 higher rates of employment and improved health outcomes.

25 4. Our study used data from Emergency Medicaid, a government program that provides  
26 coverage for emergencies and labor and delivery services for low-income individuals who are not  
27 eligible for Medicaid. The program serves unauthorized immigrants and lawful permanent residents  
28 with less than 5 years of residency. Estimates from states such as California indicate that 90 to 99%

1 of Emergency Medicaid recipients are unauthorized immigrants. In addition, because U.S.-born  
2 children of unauthorized immigrants are U.S. citizens, they are eligible for full-scope Medicaid  
3 benefits (if meeting all requirements) and can be tracked with Medicaid claims data. We limited our  
4 sample to children whose mothers were under age 31 as of June 15, 2012—a date tied to the DACA  
5 eligibility criterion announced when DACA was adopted on June 15, 2012. Our data did not reflect  
6 whether mothers apply for DACA, but given that mothers who were born just before or after the  
7 DACA birthdate cutoff are similar in confounding characteristics, we can isolate the intention-to-treat  
8 effect of DACA eligibility on the health of their children.

9 5. Using this sampling criteria, we used Medicaid claims data from Oregon to identify 5,653  
10 mothers born between 1980 and 1982 who were covered by Emergency Medicaid and gave birth to  
11 8,610 children between 2003 and 2015. We then tracked the children's mental health outcomes by  
12 using their Medicaid claims. The children in our sample were born in Oregon and are therefore U.S.  
13 citizens by birth; 49% are female, 73% are Hispanic, and they were between 0 and 12 years old in  
14 2015.

15 6. Although parental DACA eligibility could affect a broad range of child health outcomes,  
16 we focused on the impacts on children's mental health. Because DACA offered the mothers  
17 immediate relief from the risk of deportation, maternal stress might have declined, and their children  
18 would no longer have had to fear being separated from them. Therefore, the children's mental well-  
19 being could have improved. Moreover, examining mental health disorders that originate in childhood  
20 is important because they are associated with long-term health issues, low education, and welfare  
21 dependence, which generate considerable private and social costs. Our main child outcome is a broad  
22 measure of any diagnoses of adjustment disorder, acute stress disorder, or anxiety disorder, measured  
23 using all diagnoses in the International Classification of Diseases 9 (ICD-9) categories 309, 308, and  
24 300:

- 25 a. Adjustment disorder is a reaction to an identified stressor, leading to an inability to  
26 function normally. It is diagnosed on the basis of symptoms of anxiety, depressed  
27 mood, and conduct disturbances and often results in considerable impairment in  
28

1 important areas of functioning, such as social activities, school performance, and  
2 sleep.

3 b. Acute stress disorder can be a precursor to a diagnosis of a more lasting  
4 posttraumatic stress disorder (included in the ICD-9 category 309, adjustment  
5 disorder). It is characterized by symptoms or behaviors similar to those that arise  
6 from exposure to a traumatic or stressful event, but acute stress disorders cannot (by  
7 definition) last longer than 1 month.

8 c. Anxiety disorders are characterized by excessive fear, anxiety, and related  
9 behavioral disturbances that can lead to substantial distress or impairment. An  
10 external stressor might not be clearly identified, and anxiety disorders can be caused  
11 by environmental, genetic, or physiological factors.

12 These mental health disorders in childhood are associated with considerable developmental,  
13 psychosocial, and psycho-pathological complications for children and their families.

14 7. We found that mothers' eligibility for DACA protection led to a significant improvement  
15 in their children's mental health. Specifically, Mothers' DACA eligibility reduced adjustment and  
16 anxiety disorder diagnoses in their children by 4.3 percentage points ( $P = 0.023$ ) from a baseline rate  
17 of 7.9% among children of ineligible mothers at the threshold. This reduction represents more than a  
18 50% drop in the rate of these disorders (albeit with a wide 95% confidence interval (CI) for the  
19 magnitude of the estimated effect) and provides evidence that mothers' DACA eligibility sharply  
20 improved their children's mental health.

21 8. The causal link between parental DACA eligibility and positive child mental health  
22 outcomes is based on the idea that the DACA birthdate cutoff is an arbitrary date, and, therefore,  
23 children of ineligible mothers born just before the birthdate cutoff should be similar in all respects,  
24 including in possible confounding characteristics, to children of DACA-eligible mothers born just  
25 after the cutoff. We corroborated this continuity assumption by testing for differences in the  
26 prevalence of disorder diagnoses in the children during a similar time period pre-DACA (2003 to  
27 quarter 2, 2012) and at the cutoff date. We confirmed that there were no discernible difference in the  
28 prevalence of disorder diagnoses at the same cutoff date for the pre-DACA period. The difference in

1 diagnosis rates at the cutoff was a statistically insignificant 0.4 percentage points. All our tests  
2 suggested that we can isolate the causal effects of mothers' DACA eligibility at the birthdate cutoff.

3 9. We also confirmed that there were no discernible differences in diagnoses at the same  
4 birthdate cutoff among children of mothers who were covered by standard Medicaid at the time they  
5 gave birth. These mothers should not be affected by DACA eligibility, given that standard Medicaid  
6 in Oregon is open only to low-income U.S. citizens and long-term lawful permanent residents. This  
7 check again underscores that, in the absence of changes in DACA eligibility, there is no evidence of  
8 confounders associated with having a mother who is born just before or after the cutoff date that  
9 could explain the observed post-DACA difference in child mental health outcomes.

10 10. Because health care utilization could be affected by immigration status, we also checked  
11 for the possibility that the drop in diagnoses reflects a DACA-induced change in health care visits,  
12 which could affect the probability of detection of mental health disorders. We found no support for  
13 this. Mothers' DACA eligibility had no discernible impact on their children's health care utilization  
14 during the post-DACA period, as measured either by the total number of visits, the number of  
15 emergency room (ER) and urgent care visits, or the number of outpatient visits. Consistent with this,  
16 in a non-prespecified analysis, we also found that the effects of mothers' DACA eligibility on child  
17 mental health were similar when we restricted the sample to children who had at least one health care  
18 visit in the post-DACA period.

19 11. Our results provide causal evidence supporting the theory that parental unauthorized  
20 immigration status has important intergenerational effects on the well-being and development of  
21 children in immigrant families. Protecting unauthorized immigrants from deportation led to  
22 immediate and sizable improvements in the mental health of their U.S. citizen children. This  
23 suggests that parents' unauthorized status is a substantial stressor that stymies normal child  
24 development and perpetuates health inequalities by transferring parental disadvantages to children.

25 12. Our findings have important implications for immigration and health care policy. Prior  
26 research has suggested that early childhood exposure to stress and adversity does not only cause poor  
27 health and impaired development in the short term; the issues can also persist into adulthood.  
28 Anxiety and psychosocial stress have been identified as risk factors for depression, substance abuse,



1 cardiovascular diseases, and obesity. Treatment of mental disorders also carries considerable  
2 economic costs. Prior research indicates that they account for the highest total health care  
3 expenditures of all children's medical conditions and that they are associated with poor long-term  
4 outcomes for school performance and welfare reliance. By reducing mental health problems,  
5 deferred action can therefore have important multiplier effects through improving the future  
6 prospects of the children of unauthorized immigrants.

7 13. Conversely, the termination of DACA is likely to erode the mental health gains we  
8 measured and lead to corresponding economic and public health costs in both the short-term and long  
9 term.

10  
11 We declare under penalty of perjury under the laws of the United States that the foregoing is  
12 true and correct and that this declaration was executed on October 23, 2017 in Stanford, California.

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15 \_\_\_\_\_  
JENS HAINMUELLER

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DUNCAN LAWRENCE

# **EXHIBIT A**

# Curriculum Vitae

Jens Hainmueller

## Office:

Department of Political Science, Stanford University, Encina Hall West, Room 440, 616 Serra Street, Stanford, CA 94305-6044  
jhain@stanford.edu, <http://www.stanford.edu/~jhain>

## Current Positions

Full Professor, Department of Political Science, Stanford University, 2016-present.  
Full Professor (by courtesy), Graduate School of Business, Stanford University, 2016-present

## Academic Affiliations

Founder and Faculty Co-Director, Stanford Immigration Policy Lab, 2014-present  
Faculty Associate, Institute for Quantitative Social Science, Harvard University, 2009-present  
Faculty Fellow, WZB Berlin Social Research Center, 2013-15  
Faculty Fellow, Centre for Research and Analysis of Migration, University College London, 2013-present  
Faculty Affiliate, Stanford Europe Center, 2014-present  
Faculty Affiliate, Stanford Center for Comparative Studies in Race and Ethnicity, 2015-present  
Member, Experiments on Governance and Politics (EGAP)

## Previous Positions

Associate Professor, Department of Political Science, Stanford University, 2014-2016.  
Associate Professor (by courtesy), Graduate School of Business, Stanford University, 2014-2016.  
Associate Professor, Department of Political Science, Massachusetts Institute of Technology, 2012-2013.  
Assistant Professor, Department of Political Science, Massachusetts Institute of Technology, 2009–2012.

## Education

Ph.D., Government, Harvard University, 2009.  
M.P.A., Master of Public Administration, Harvard University, Kennedy School of Government, 2005.  
M.Sc., International Political Economy (with Distinction), London School of Economics, 2003.  
DAAD Research Fellow, Political Science Department, Brown University, 2001–2002.  
B.A., *Zwischenprüfung* (Summa Cum Laude), Tübingen University, 2001.

## Impact Factor

Google Scholar Citations: 6,248  
Google Scholar h-index: 29  
Google Scholar i10-index: 47

## Selected Awards and Honors

*Andrew Carnegie Fellow* 2016-2017. Awarded by the Carnegie Corporation of New York to the country's most creative thinkers to support research on challenges to democracy and international order.  
*Halbert White Info-Metrics Prize* 2016. Awarded by the Info-Metrics Institute for scholars across disciplines who have creatively used info-metrics methods in their respective disciplines, with the potential for significant impact in those disciplines.  
*Warren Miller Prize* 2015. Awarded by the Society of Political Methodology for the best work appearing in *Political Analysis* the preceding year.  
*Emerging Scholar Award* 2014. Awarded by the Society for Political Methodology to honor a researcher, within ten years of their PhD, who is making notable contributions to the field of political methodology.  
*Political Analysis Editors' Choice Award* 2014. Given to papers that the Editors see as providing an especially significant contribution to political methodology.  
*Warren Miller Prize* 2013. Awarded by the Society of Political Methodology for the best work appearing in *Political Analysis* the preceding year.  
*Best Paper on the study of elections, public opinion, and voting behavior* 2013. Awarded by the American Political Science Association.  
*Best Paper on the study of labor in politics* 2012. Awarded by the American Political Science Association.

- Robert H. Durr Award* 2012 awarded by the Midwest Political Science Association for the best paper applying quantitative methods to a substantive problem in political science.
- Senator Charles Sumner Prize* 2009. Awarded by Harvard faculty for the best dissertation from the legal, political, historical, economic, social, or ethnic approach.
- Robert H. Durr Award* 2008 awarded by the Midwest Political Science Association for the best paper applying quantitative methods to a substantive problem in political science.
- Gosnell Prize for Excellence in Political Methodology* 2007. Awarded by the Society of Political Methodology for the best work in political methodology presented at any political science conference during the preceding year.

## Publications

### Peer Reviewed Articles

43. “Protecting Unauthorized Immigrant Mothers Improves their Children’s Mental Health” (with D. Lawrence, L. Martén, B. Black, L. Figueroa, M. Hotard, T. Jiménez, F. Mendoza, M. Rodriguez, J. Swartz, D. Laitin). *Science*. doi.org/10.1126/science.aan5893
42. “The Number of Choice Tasks and Survey Satisficing in Conjoint Experiments” (with K. Bansak, D. Hopkins, and T. Yamamoto). *Political Analysis*. (forthcoming).
41. “Expanding prenatal care to unauthorized immigrant women and the effects on infant health” (with J. Swartz, D. Lawrence, and M. Rodriguez). *Obstetrics & Gynecology*. (forthcoming).
40. “Europeans Would Support a Proportional Allocation of Asylum Seekers” (with K. Bansak and D. Hangartner). *Nature Human Behaviour*. doi:10.1038/s41562-017-0133.
39. “Providing driver’s licenses to unauthorized immigrants in California improves traffic safety” (with D. Lawrence and H. Lueders). *Proceedings of the National Academy of Sciences*. doi: 10.1073/pnas.1618991114.
38. “Policy Design and Domestic Support for International Bailouts” (with M. Bechtel and Y. Margalit). *European Journal of Political Research*. 10.1111/1475-6765.12210.
37. “How Economic, Humanitarian, and Religious Concerns Shape European Attitudes toward Asylum-Seekers” (with K. Bansak and D. Hangartner). *Science*. doi: 10.1126/science.aag2147.
36. “When lives are put on hold: Lengthy asylum processes decrease employment among refugees” (with D. Hangartner and D. Lawrence). *Science Advances*. 2(8), e1600432.
35. “Catalyst or Crown: Does Naturalization Promote the Long-Term Social Integration of Immigrants?” (with D. Hangartner and G. Pietrantuono). *American Political Science Review*. pp. 1-21. doi: 10.1017/S0003055416000745.
34. “krls: A Stata Package for Kernel-Based Regularized Least Squares” (with J. Ferwerda and C. Hazlett). *Journal of Statistical Software*. doi: 10.18637/jss.v079.i03.
33. “Naturalization fosters the long-term political integration of immigrants” (with D. Hangartner and G. Pietrantuono). *Proceedings of the National Academy of Sciences*. doi: 10.1073/pnas.1418794112.
32. “Does Lean Improve Labor Standards? Management and Social Performance in the Nike Supply Chain” (with Distelhorst, G. and R. Locke). *Management Science*. doi: http://dx.doi.org/10.1287/mnsc.2015.2369
31. “Do Lower Caseloads Improve the Performance of Public Employment Services? New Evidence from German Employment Offices” (with B. Hofmann, G. Krug, and K. Wolf). *Scandinavian Journal of Economics*. doi: 10.1111/sjoe.12166
30. “Does Direct Democracy Hurt Immigrant Minorities? Evidence from Naturalization Decisions in Switzerland” (with D. Hangartner). *American Journal of Political Science*. (Forthcoming 2015).
29. “Validating vignette and conjoint survey experiments against real-world behavior” (with D. Hangartner and T. Yamamoto). *Proceedings of the National Academy of Sciences*. 112 (8): 2395-2400. 2015.
28. “Assessing the External Validity of Election RD Estimates: An Investigation of the Incumbency Advantage” (with A. Hall and J. Snyder). *Journal of Politics*. 77(3): 707-720. 2015.

27. “Do Concerns about Labour Market Competition Shape Attitudes Toward Immigration? New Evidence from U.S. Workers” (with M. Hiscox and Y. Margalit). *Journal of International Economics*. 97: 193-207. 2015.
26. “The Hidden American Immigration Consensus: A Conjoint Analysis of Attitudes Toward Immigrants” (with D. Hopkins). *American Journal of Political Science*. 59(3): 529-548. 2015. Winner of the American Political Science Association’s Best Paper Award for the study of Elections, Public Opinion, and Voting Behavior.
25. “On the Validity of the Regression Discontinuity Design for Estimating Electoral Effects: New Evidence from Over 40,000 Close Races” (with A. Eggers, A. Fowler, A. Hall, and J. Snyder). *American Journal of Political Science*. 59 (1): 259-274. 2015.
24. “Consumer Demand for the Fair Trade Label: Evidence from a Field Experiment” (with M. Hiscox and S. Sequeira). *Review of Economics and Statistics*. 97(2): 242-256. 2015.
23. “Reality Bites: The Limits of Framing Effects for Salient and Contested Policy Issues” (with M. Bechtel, D. Hangartner, and M. Helbling). *Political Science Research and Methods*. 3 (3): 683-695. 2015.
22. “Comparative Politics and the Synthetic Control Method” (with A. Abadie and A. Diamond). *American Journal of Political Science*. 59 (2): 495-510. 2015.
21. “Political Capital: Corporate Connections and Stock Investments in the U.S. Congress, 2004-2008” (with A. Eggers). *Quarterly Journal of Political Science*. 9 (2): 169-202. 2014.
20. “Causal Inference in Conjoint Analysis: Understanding Multi-Dimensional Choices via Stated Preference Experiments” (with D. Hopkins and T. Yamamoto). *Political Analysis*. 22 (1): 1-30. 2014. Winner of the *Editors’ Choice Award* given to papers that the Editors see as providing an especially significant contribution to political methodology. Winner of the 2015 Warren Miller Prize for the best work appearing in *Political Analysis* the preceding year.
19. “Public Attitudes toward Immigration” (with D. Hopkins). *Annual Review of Political Science*. 17: 225-249. 2014
18. “Kernel Regularized Least Squares: Reducing Misspecification Bias with a Flexible and Interpretable Machine Learning Approach” (with C. Hazlett). *Political Analysis*. 22 (2): 143-168. 2014.
17. “Preferences for International Redistribution: The Divide Over the Eurozone Bailouts” (with M. Bechtel and Y. Margalit). *American Journal of Political Science*. 58 (4): 835-856. 2014.
16. “Capitol Losses: The Mediocre Performance of Congressional Stock Portfolios, 2004-2008” (with A. Eggers). *Journal of Politics*. 75(2): 535-551. 2013.
15. “Who Gets a Swiss Passport? A Natural Experiment in Immigrant Discrimination” (with D. Hangartner). *American Political Science Review*. 107(1): 159-187. 2013. Winner of the Robert H. Durr 2012 award for the best paper applying quantitative methods to a substantive problem in political science.
14. “ebalance: A Stata Package for Entropy Balancing” (with Y. Xu). *Journal of Statistical Software*. 54(7). 2013.
13. “Entropy Balancing: A Multivariate Reweighting Method to Produce Balanced Samples in Observational Studies” *Political Analysis*. 20 (1): 25-46. 2012. Winner of the 2013 Warren Miller Prize for the best work appearing in *Political Analysis* the preceding year.
12. “How Lasting is Voter Gratitude? An Analysis of the Short- and Long-term Electoral Returns to Beneficial Policy” (with M. Bechtel). *American Journal of Political Science*. 55 (4): 852-868. 2011.
11. “Synth: An R Package for Synthetic Control Methods in Comparative Case Studies” (with A. Abadie and A. Diamond). *Journal of Statistical Software*. 42 (13): 1-13. 2011.
10. “Attitudes toward Highly Skilled and Low Skilled Immigration: Evidence from a Survey Experiment” (with M. Hiscox). *American Political Science Review*. 104 (1): 61-84. 2010.

9. “MPs for Sale: Estimating Returns to Office in Post-War British Politics” (with A. Eggers). *American Political Science Review*. 103 (4): 513-533. 2009. Winner of the Robert H. Durr 2008 award for the best paper applying quantitative methods to a substantive problem in political science.
8. “Synthetic Control Methods for Comparative Case Studies of Aggregate Interventions: Estimating the Effect of California’s Tobacco Control Program” (with A. Abadie and A. Diamond). *Journal of the American Statistical Association*. 105(490): 493-505. 2010. Winner of the Gosnell Prize for Excellence in Political Methodology. Among JASA’s 10 most cited articles in 2009-11.
7. “Opium for the Masses: How Free Foreign Media can Stabilize Authoritarian Regimes” (with H. Kern). *Political Analysis*. 17: 377-399. 2009.
6. “Incumbency as a Source of Spillover Effects in Mixed Electoral Systems: Evidence from a Regression-Discontinuity Design” (with H. Kern). *Electoral Studies*. 27 (2): 213-227. 2008.
5. “Phylogenetic analysis and structural predictions of human adenovirus penton proteins as a basis for tissue-specific adenovirus vector design” (with I. Madisch, S. Hofmayer, C. Moritz, A. Grintzalis, P. Pring-Akerblom, and A. Heim) *Journal of Virology* 81(15): 8270-81. 2007.
4. “Educated Preferences: Explaining Individual Attitudes Toward Immigration in Europe” (with M. Hiscox). *International Organization*. 61(2): 399-442. 2007.
3. “Electoral Balancing, Divided Government, and Midterm Loss in German Elections” (with H. Kern). *Journal of Legislative Studies*. 12 (2): 127-149. 2006.
2. “Learning to Love Globalization: The Effects of Education on Individual Attitudes Toward International Trade” (with M. Hiscox). *International Organization*. 60 (2) 469-498. 2006.
1. “Why do Europeans fly safer? The politics of airport security in Europe and the US” (with M. Lemnitzer). *Terrorism and Political Violence*. 15 (4): 1-36. 2003.

#### Book Chapters

- B.2 “Voter Attitudes towards High- and Low-Skilled Immigrants: Evidence from Survey Experiments” (with M. Hiscox, reprinted APSR manuscript) in *Immigration and Public Opinion in Liberal Democracies*. G. P. Freeman, R. Hansen, D. L. Leal (eds.). Routledge Research in Comparative Politics. 2012.
- B.1 “Wahlkreisarbeit zahlt sich doppelt aus - Zur Wirkung des Amtsinhaberstatus einer Partei auf ihren Zweitstimmenanteil bei den Bundestagswahlen 1949 bis 1998” (with H. Kern und M. Bechtel) in *Jahrbuch für Handlungs- und Entscheidungstheorie*. 11-47. 2006. T. Bräuninger and J. Behnke (eds.). Wiesbaden: Verlag für Sozialwissenschaft.

#### Software

- S.6 *interflex Package* (with Y. Xu and J. Mummolo). *interflex* is a statistical software that implements multiplicative interaction models with diagnostics and visualization. *interflex* is available as an R library and a Stata routine.
- S.5 *Synth Package* (with A. Abadie and A. Diamond). *Synth* is a statistical software that implements synthetic control methods for causal inference in comparative case studies. *Synth* is available as an R library, MATLAB code, and a Stata routine.
- S.4 *ebalance Package*. *ebalance* is a statistical software that implements entropy balancing. *ebalance* is available as an R library and as a Stata routine.
- S.3 *KRLS Package* (with C. Hazlett). *KRLS* is a statistical software that implements Kernel Regularized Least Squares. *KRLS* is available as an R library, MATLAB code, and a Stata routine.
- S.2 *Conjoint Survey Design Tool* (with A. Strezhnev, D. Hopkins, and T. Yamamoto). The Conjoint Survey Design Tool assists researchers in creating conjoint experiments that can be readily incorporated into pre-existing web survey software.
- S.1 *cjoint* (with A. Strezhnev, E. Berwick, D. Hopkins, and T. Yamamoto). The *cjoint* R package implements the Average Marginal Component-specific Effects (AMCE) estimator for conjoint experiments.

Jens Hainmueller

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### **Work in Progress**

#### *Under Review*

“How Much Should We Trust Estimates from Multiplicative Interaction Models? Simple Tools to Improve Empirical Practice” (with J. Mummolo and Y. Xu)

”The Ideological Basis of the Grexit Debate” (with K. Bansak, M. Bechtel and Y. Margalit). 2015.

“The Socially Conscious Consumer? Field Experimental Tests of Consumer Support for Fair Labor Standards” (with M. Hiscox). 2014. Winner of the American Political Science Association’s Labor Project Best Paper award for the best paper on the study of labor in politics.

“Buying Green? Field Experimental Tests of Consumer Support for Environmentalism” (with M. Hiscox). 2014.

### **Selected Grants**

Robert Wood Johnson Foundation \$70,150. Assessing the fiscal and health consequences of providing prenatal care to undocumented and recently arrived immigrants.

Russell Sage Foundation \$109,065. Impact of Undocumented Status.

Ford Foundation \$800,000. Core Support Immigration Policy Lab.

Andrew Carnegie Fellow \$200,000.

Swiss National Science Foundation, Impact of Asylum Policies on Refugee Integration \$280,000.

New York Community Trust \$300,000.

Robin Hood Foundation \$800,000.

UPS Endowment Fund \$60,000.

FSI Policy Implementation Lab Seed Funding \$35,000.

Time Sharing Experiments in the Social Sciences, Conjoint Voting Study.

Swiss National Science Foundation, Mass Support for Financial Bailouts \$245,000.

Swiss National Science Foundation, Effects of Citizenship Project \$200,000.

Russell Sage Foundation, Value of Citizenship Pilot Project \$35,000.

WZB Research Grant, Wissenschaftszentrum Berlin EUR 35’000.

Swiss National Science Foundation, Local Xenophobia Project \$220,000.

NBER Africa Project \$65,000.

Humanity United Foundation, Fair Trade Project \$235,000.

Humanity United Foundation, Consumer Demand for Ethical Products \$20,000.

### **Professional Experience**

Statistical consultant, International Finance Corporation, The World Bank Group.

Statistical consultant, German Federal Labor Market Agency.

Statistical consultant, German Research Institute for Labor Market Policy (IAB).

### **Advising Ph.D. Students**

#### *Main Dissertation Advisor*

Yiqing Xu, Assistant Professor, University of California San Diego (graduated 2015)

Chad Hazlett, Assistant Professor, University of California Los Angeles (graduated 2013)

Mathilde Emeriau, ongoing

Kirk Bansak, ongoing

#### *Dissertation Committee Member*

Francisco Garfias, Assistant Professor, University of California San Diego (graduated 2016)

Jeremy Ferwerda, Assistant Professor, Dartmouth College (graduated 2015)

Greg Distelhorst, Assistant Professor, Oxford University Said Business School (graduated 2013)

Michael Sances, Assistant Professor, University of Memphis (graduated 2013)

Lucas Puente, Policy Analyst, Thumbtack, Inc (graduated 2015)

Tannis Thorlakson, ongoing

Jens Hainmueller

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### Teaching

Political Methodology I: Regression, Stanford

- Autumn 2015-16 (Overall Rating: 4.8 out of 5)
- Autumn 2014-15 (Overall Rating: 4.5 out of 5)

Political Methodology II: Causal Inference, Stanford

- Winter 2015-16 (Overall Rating: 4.7 out of 5)
- Winter 2014-15 (Overall Rating: 4.4 out of 5)
- Spring 2013-14 (Overall Rating: 4.8 out of 5)

Empirical Methods in Political Economy, Fall 2013, MIT

Quantitative Research Methods II: Advanced Empirical Methods, MIT

- Spring 2012 (Overall Rating: 6.9 out of 7)
- Spring 2011 (Overall Rating: 4.7 out of 5)
- Spring 2010 (Overall Rating: 4.9 out of 5)

Quantitative Research Methods I: Regression, MIT

- Fall 2011 (Overall Rating: 6.4 out of 7)
- Fall 2010 (Overall Rating: 4.8 out of 5)
- Fall 2009 (Overall Rating: 4.0 out of 5)

Designing and Implementing Field Experiments, 2012, MIT. Overall rating: 4.8 out of 5.

August, 2017

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# **EXHIBIT B**

# Duncan Lawrence

## Curriculum Vitae

### Education

- 2007–2013 **PhD/MA**, *University of Colorado*, Boulder, CO.  
Political Science
- 2000–2004 **BA**, *Hamilton College*, Clinton, NY.  
World Politics

### Professional Experience

- 2014–Present **Executive Director**, IMMIGRATION POLICY LAB, STANFORD UNIVERSITY, Stanford, CA.
- 2012–2017 **Co-Founder**, TELLURIDE RESEARCH GROUP, LLC, Denver, CO.
- 2013–2014 **Associate**, ROCKY MOUNTAIN INSTITUTE, Boulder, CO.
- 2011–2012 **Graduate Instructor**, UNIVERSITY OF COLORADO, Boulder, CO.
- 2011 **Research Methods Mentor/Field Survey Coordinator**, UNIVERSITY OF COLORADO, Arequipa, Peru.
- 2008–2011 **Research Assistant**, UNIVERSITY OF COLORADO, Boulder, CO.
- 2007–2011 **Teaching Assistant**, UNIVERSITY OF COLORADO, Boulder, CO.
- 2006–2007 **Medical Interpreter**, EL PUENTE, Jackson, WY.

### Publications

#### Peer Reviewed Articles

8. "Expanding Prenatal Care to Unauthorized Immigrant Women and the Effects on Infant Health" (with J. Swartz, J. Hainmueller, and M. Rodriguez) *Obstetrics and Gynecology*. 2017.
7. "Protecting unauthorized immigrant mothers improves their children's mental health" (with J. Hainmueller et al.) *Science*. 2017.
6. "Providing driver's licenses to unauthorized immigrants in California improves traffic safety." (with H. Leuders and J. Hainmueller) *Proceedings of the National Academy of Sciences*. 114(16):4111-4116, 2017.
5. "When lives are put on hold: Lengthy asylum processes decrease employment among refugees." (with D. Hangartner and J. Hainmueller) *Science Advances*, 2(8):e1600432, 2016.
4. "More trees, more poverty? The socioeconomic effects of tree plantations in Chile, 2001–2011." (with K. Andersson, J. Zavaleta, and M. R. Guariguata) *Environmental Management*, 57(1):123–136, 2016.

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3. "Crossing the cordillera: Immigrant attributes and Chilean attitudes." *Latin American Research Review*, 50(4):154–177, 2015.
2. "Local cohesion and radical right support: The case of the Swiss People's Party." (with J. Fitzgerald) *Electoral Studies*, 30(4):834–847, 2011.
1. "Immigration Attitudes in Latin America: Culture, Economics, and the Catholic Church." *The Latin Americanist*, 55(4), 143-170, 2011.

## Grants

### Co-Principal Investigator

- 2017 STANFORD CHILD HEALTH RESEARCH INSTITUTE, \$100,000.
- 2017 STANFORD CENTER FOR CLINICAL AND TRANSLATIONAL RESEARCH AND EDUCATION, \$20,000.
- 2016 ROBERT WOOD JOHNSON FOUNDATION - EVIDENCE FOR ACTION, \$70,150.
- 2016 RUSSELL SAGE FOUNDATION, \$109,065.

### Lab Research/Core Support

- 2016 FORD FOUNDATION, \$400,000.
- 2016 NATIONAL SCIENCE FOUNDATION, \$149,978.
- 2016 ROBIN HOOD FOUNDATION, \$800,000.
- 2016 NEW YORK COMMUNITY TRUST, \$350,000.
- 2015 UPS ENDOWMENT FUND, \$60,110.

## Fellowships

- 2013 Fulbright Scholar – Chile
- 2011 University of Colorado Department of Recreation Services Graduate Fellowship
- 2008–2011 University of Colorado Department of Political Science Summer Research Fellowship
- 2009 CARTSS Scholars Grant (co-investigator)
- 2005 Fulbright English Teaching Fellowship – Argentina

## Awards and Honors

- 2012 Best Graduate Instructor, Department of Political Science, University of Colorado Boulder
- 2004 Phi Beta Kappa Honor Society
- 2004 Pi Sigma Alpha Honor Society
- 2004 Constantine Karamanlis Award – Outstanding Senior Concentrator in World Politics
- 200–2004 Dean's List

## Teaching Experience

- Instructor International Political Economy (2011,2012); Global Development (2012)

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Teaching Assistant Comparative Politics (2007–2010); Topics in Political Data Analysis (2010)

Experiential Education Instructor Hamilton College Outdoor Leadership Program (2001–2004); Hulbert Outdoor Center (2004); Wilderness Ventures (2004, 2006)

## Skills

Intermediate  $\LaTeX$ , R, Smartsheets, Asana

Advanced Google Apps, Microsoft Office, Stata, Zotero

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# **EXHIBIT C**

## RESEARCH

## SOCIAL SCIENCE

# Protecting unauthorized immigrant mothers improves their children's mental health

Jens Hainmueller,<sup>1,2,3\*</sup>† Duncan Lawrence,<sup>2</sup>† Linna Martén,<sup>2,4</sup>† Bernard Black,<sup>5</sup> Lucila Figueroa,<sup>2,6</sup> Michael Hotard,<sup>2</sup> Tomás R. Jiménez,<sup>7</sup> Fernando Mendoza,<sup>8</sup> Maria I. Rodriguez,<sup>9</sup> Jonas J. Swartz,<sup>9</sup> David D. Laitin<sup>1,2</sup>

The United States is embroiled in a debate about whether to protect or deport its estimated 11 million unauthorized immigrants, but the fact that these immigrants are also parents to more than 4 million U.S.-born children is often overlooked. We provide causal evidence of the impact of parents' unauthorized immigration status on the health of their U.S. citizen children. The Deferred Action for Childhood Arrivals (DACA) program granted temporary protection from deportation to more than 780,000 unauthorized immigrants. We used Medicaid claims data from Oregon and exploited the quasi-random assignment of DACA eligibility among mothers with birthdates close to the DACA age qualification cutoff. Mothers' DACA eligibility significantly decreased adjustment and anxiety disorder diagnoses among their children. Parents' unauthorized status is thus a substantial barrier to normal child development and perpetuates health inequalities through the intergenerational transmission of disadvantage.

There is an ongoing, heated debate about the fate of the estimated 11 million unauthorized immigrants living in the United States. One important and often overlooked issue in these policy debates is that unauthorized immigrants are also parents to more than 4 million children who are U.S. citizens by birth (1, 2). How are these children affected by the unauthorized status of their parents? Research has largely focused on the impacts of unauthorized status on the immigrants themselves (3), but we know much less about the potential intergenerational effects of this status on the well-being of their offspring (4).

A growing body of research has demonstrated links between parental immigration status and child development (5–10) and generated insights into how it might affect children's health. Children of unauthorized immigrant parents face challenges beyond low socioeconomic status, including parental anxiety, fear of separation, and acculturative stress. Parent-child separations can be harmful to children's health, economic security, and long-term development. Virtually all of these studies have been qualitative or correla-

tional because of the difficulties in isolating the causal effects of parents' immigration status and collecting systematic data on large samples of unauthorized immigrants.

Families with unauthorized immigrant parents differ from families with authorized immigrant parents in many confounding characteristics (e.g., education, health care, and poverty) that might generate differences in child outcomes (11–13). This nonrandom selection implies that typical observational studies cannot isolate the causal effect of immigration status. Indeed, a recent consensus statement of the Society for Research on Adolescence (14) concludes that “Nonexperimental or quasiexperimental research with strong causal inference...has been lacking to date in studies of policies and practices related to unauthorized status.”

The study of unauthorized status is further constrained by the difficulty of collecting systematic samples, because unauthorized immigrants are underrepresented in general population surveys (15). Moreover, questions about the unauthorized status of immigrants are typically avoided given concerns about confidentiality and reporting biases (16). Researchers therefore often have to resort to noisy proxies for unauthorized status, such as the identification of individuals as foreign-born, Hispanic, or Spanish-speaking (17, 18).

We provide causal evidence of the intergenerational impact of parental immigration status on children's health. We focus on the Deferred Action for Childhood Arrivals (DACA) program, which is one of the most extensive policies directed toward unauthorized immigrants in recent decades. The DACA program, announced in 2012 by President Obama, protects recipients from deportation by granting them a 2-year (renewable) deferred action status, while also allow-

ing them to obtain temporary work authorization. More than 780,000 unauthorized immigrants so far have received deferred action through this program (19) (fig. S1). Although DACA recipients arrived in the United States as children, many are now adults and have become parents themselves. An estimated 200,000 children had parents who were eligible for DACA at the time the policy was announced (2). Although some studies have found that DACA recipients have higher rates of employment (20–22) and improved health outcomes (23, 24), the intergenerational effects of DACA are largely unknown.

To address the sampling problem, we used data from Emergency Medicaid, a government program that provides coverage for emergencies and labor and delivery services for low-income individuals who are not eligible for Medicaid. The program mainly serves unauthorized immigrants, but lawful permanent residents with less than 5 years of residency can also obtain coverage. Estimates from states such as California and North Carolina indicate that 90 to 99% of Emergency Medicaid recipients are unauthorized immigrants (25, 26). In addition, because U.S.-born children of unauthorized immigrants are U.S. citizens, they are eligible for full-scope Medicaid benefits and can be tracked with Medicaid claims data.

To overcome the causal identification problem, we applied a regression discontinuity (RD) design (27) that leverages the DACA eligibility criterion (28) stipulating that recipients must have been under age 31 as of 15 June 2012. Hence, a person born on 16 June 1981 meets the DACA age eligibility requirement, whereas a person born on 14 June 1981 does not. The age eligibility criterion was announced when DACA was adopted on 15 June 2012. The Emergency Medicaid enrollment data include the mother's exact date of birth, and this permits us to leverage a quasi-experiment in which DACA eligibility is as good as randomly assigned for those born around the arbitrary birthdate cutoff. We do not observe whether mothers apply for DACA, but given that mothers who were born just before or after the DACA birthdate cutoff are similar in confounding characteristics, we can isolate the intention-to-treat effect of DACA eligibility on the health of their children. Prior studies provide evidence that RD designs that exploit arbitrary cutoff points in eligibility criteria are effective in replicating results from randomized experiments (29–31).

We drew on Medicaid claims data from Oregon to identify 5653 mothers born between 1980 and 1982 who were covered by Emergency Medicaid and gave birth to 8610 children during 2003 to 2015. We then tracked the children's mental health outcomes by using their Medicaid claims. The children in our sample were born in Oregon and are therefore U.S. citizens by birth; 49% are female, 73% are Hispanic, and they were between 0 and 12 years old in 2015 (table S1 provides descriptive statistics).

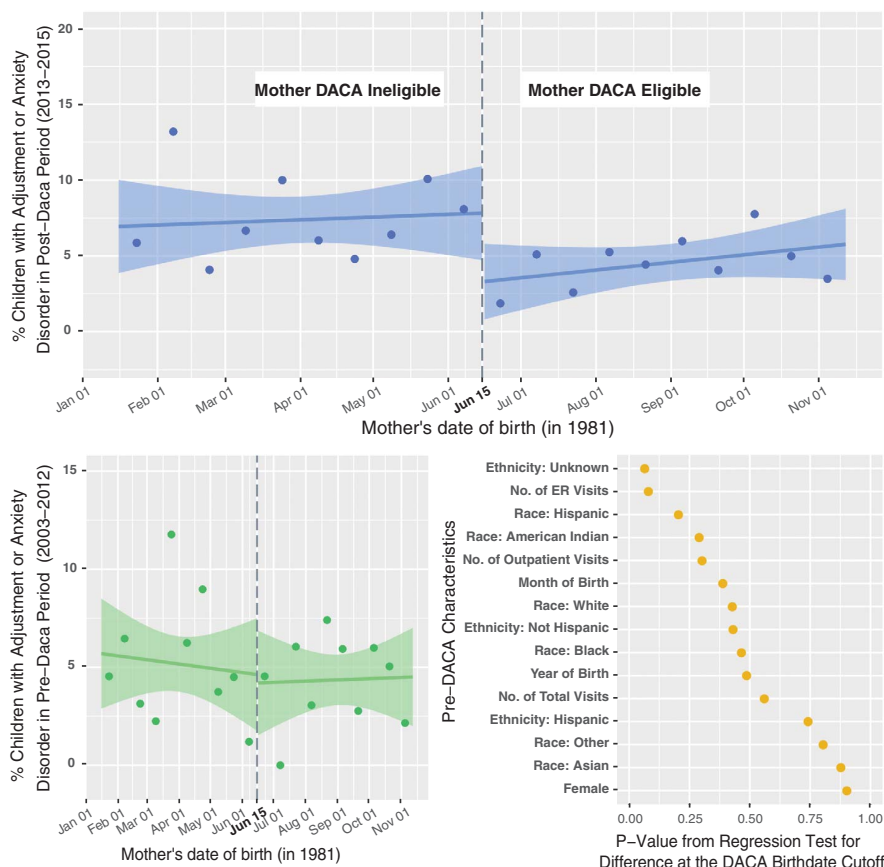
Although parental DACA eligibility could affect a broad range of child health outcomes, we focused on the impacts on children's mental

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<sup>4</sup>Uppsala Center for Labor Studies, Uppsala University, Uppsala 75120, Sweden. <sup>5</sup>Pritzker Law School and Kellogg School of Management, Northwestern University, Chicago, IL 60611, USA. <sup>6</sup>Department of Politics, University of Virginia, Charlottesville, VA 22903, USA. <sup>7</sup>Department of Sociology, Stanford University, Stanford, CA 94305, USA. <sup>8</sup>Department of Pediatrics, Stanford University School of Medicine, Stanford, CA 94305, USA. <sup>9</sup>Department of Obstetrics and Gynecology, Oregon Health & Science University, Portland, OR 97239, USA.

\*Corresponding author. Email: jhain@stanford.edu

†These authors contributed equally to this work.



**Fig. 1. Results from applying the regression discontinuity design. (Top)** In the post-DACA period (2013 to 2015), children of DACA-eligible mothers (born after 15 June 1981) experienced markedly lower rates of diagnosed adjustment and/or anxiety disorders than children of ineligible mothers (born before 15 June 1981). Lines are average diagnosis rates (with 95% confidence bands) from local linear regressions fitted to the sample of children whose mothers' birthdates were within  $\pm 150$  days of the DACA eligibility cutoff ( $n = 2260$ ), and circles are average diagnosis rates within each 15-day birthdate interval. **(Bottom left)** There was no such difference in children's diagnosis rates in the pre-DACA period (2003 to 2012). **(Bottom right)** There was no statistical evidence for discontinuities in other background characteristics that might confound the comparison at the DACA birthdate eligibility cutoff.

health. Because DACA offered the mothers immediate relief from the risk of deportation, maternal stress might have declined, and their children would no longer have had to fear being separated from them. Therefore, the children's mental well-being could have improved (4, 6). Moreover, examining mental health disorders that originate in childhood is important because they are associated with long-term health issues, low education, and welfare dependence, which generate considerable private and social costs (32–34).

We focused on disorders that result from external events, rather than genetic or physiological factors. We prespecified all outcomes and analyses, except when otherwise noted, in a pre-registered analysis plan made available at the Evidence in Governance and Politics website under study ID 20170227AC. Our main child outcome is a broad measure of any diagnoses of

adjustment disorder, acute stress disorder, or anxiety disorder, measured using all diagnoses in the International Classification of Diseases 9 (ICD-9) categories 309, 308, and 300 (35).

Adjustment disorder is a reaction to an identified stressor, leading to an inability to function normally. It is diagnosed on the basis of symptoms of anxiety, depressed mood, and conduct disturbances and often results in considerable impairment in important areas of functioning, such as social activities, school performance, and sleep (36, 37). Acute stress disorder can be a precursor to a diagnosis of a more lasting post-traumatic stress disorder (included in the ICD-9 category 309, adjustment disorder). It is characterized by symptoms or behaviors similar to those that arise from exposure to a traumatic or stressful event, but acute stress disorders cannot (by definition) last longer than 1 month (36). Because stress disorder and adjustment disorder

are related, we prespecified both as a combined outcome measure of adjustment disorder. Anxiety disorders are characterized by excessive fear, anxiety, and related behavioral disturbances that can lead to substantial distress or impairment. An external stressor might not be clearly identified, and anxiety disorders can be caused by environmental, genetic, or physiological factors (36).

These mental health disorders in childhood are associated with considerable developmental, psychosocial, and psychopathological complications for children and their families (32). For the children in our sample who were diagnosed with adjustment disorder, acute stress disorder, or anxiety disorder, the first diagnoses occurred on average at 6.7 years of age with a standard deviation of 2.6 years (tables S1 and S2 provide descriptive statistics). Details about the measures, sample, design, and statistical analysis can be found in the materials and methods section of the supplementary materials.

Figure 1 illustrates the main finding and quasi-experimental nature of the RD design. The percent of children diagnosed with adjustment or anxiety disorders during the post-DACA period (2013 to 2015) dropped by about 4.5 percentage points ( $P = 0.037$ ; local linear regression) at the birthdate cutoff where mothers become eligible for DACA. This reduction, from 7.8 to 3.3%, provides evidence that mothers' DACA eligibility sharply improved their children's mental health.

The causal logic of the RD design is based on the idea that the DACA birthdate cutoff is an arbitrary date, and, therefore, children of ineligible mothers born just before the birthdate cutoff should be similar in all respects, including in possible confounding characteristics, to children of DACA-eligible mothers born just after the cutoff. This continuity assumption was corroborated by a series of checks where we tested for discontinuities in pre-DACA background characteristics at the DACA birthdate cutoff. The results (Fig. 1, bottom left) demonstrate that there was no discernible difference in the prevalence of disorder diagnoses at the same cutoff date for the pre-DACA period (2003 to quarter 2, 2012). The difference in diagnosis rates at the cutoff was an insignificant 0.4 percentage points ( $P = 0.817$ ; local linear regression). Figure 1, bottom right, shows the distribution of  $P$  values from similar checks where we tested for discontinuities in other background covariates at the birthdate cutoff, such as the children's ethnicity, race, year of birth, and pre-DACA health care utilization (tables S3 and S4). The distribution of  $P$  values is consistent with the uniform distribution that we would expect for balance checks in a randomized experiment, indicating that there were no systematic discontinuities in the covariates at the birthdate cutoff. Furthermore, density tests for manipulation of mothers' birthdates revealed no evidence of sorting around the threshold (fig. S2). All tests suggested that our RD design can isolate the causal effects of mothers' DACA eligibility at the birthdate cutoff.

Figure 2 shows the point estimates and confidence intervals for the RD estimates of the intention-to-treat effects of mothers' DACA eligibility on the children's mental health outcomes, for the combined measure and its separate components (tables S5 and S6 and fig. S3). The estimates are based on prespecified standard local linear regression models fitted to trimmed samples including only children whose mothers' birthdates were within the adaptive mean squared error optimal bandwidths around the birthdate cutoff (38).

We found that mothers' eligibility for DACA protection led to a significant improvement in their children's mental health. Specifically, mothers' DACA eligibility reduced adjustment and anxiety disorder diagnoses in their children by 4.3 percentage points ( $P = 0.023$ ) from a baseline rate of 7.9% among children of ineligible mothers at the threshold. This represents more than a 50% drop in the rate of these disorders, albeit with a wide 95% confidence interval (CI) for the magnitude of the estimated effect, ranging from 0.6 to 7.9 percentage points. When we looked only at adjustment disorders, which are disorders attributable to an identifiable external stressor, the estimated reduction was 4.4 percentage points ( $P = 0.013$ ; 95% CI, 0.9 to 7.8). There was also a reduction in anxiety disorders, which is a more heterogeneous category of mental illness, but it was insignificant at conventional levels ( $P = 0.153$ ; 95% CI, -0.6 to 4.1). Lastly, we found that for the same sample of children, before the DACA program, there were no discernible differences in these mental health diagnoses at the cutoff (Fig. 2, right).

We conducted several checks that supported the robustness of the results, such as varying the bandwidths (fig. S4), using alternative estimation procedures (fig. S5 and table S7), removing children born in the post-DACA period (fig. S6 and table S8), redefining the post-DACA period to include quarters 3 and 4 of 2012 (fig. S7 and table S9), and using alternative codings of the mental health outcomes based on the Diagnostic and Statistical Manual of Mental Disorders (fig. S8 and table S10; not prespecified). A non-prespecified subgroup analysis (fig. S9) suggested that the effect of mothers' DACA eligibility was concentrated among the older children in our sample (ages 6 to 12; table S12), with no discernible effect among younger children (ages 0 to 5; table S11); younger children are generally much less likely to receive mental health diagnoses. We also conducted a non-prespecified subgroup analysis by gender (fig. S10 and tables S13 and S14) and found that the effect of mothers' DACA eligibility on adjustment disorders was slightly more pronounced among male children, but the effect for males was not statistically significantly different from that for females ( $P = 0.209$ ; local linear regression).

We also confirmed that there were no discernible differences in diagnoses at the same birthdate cutoff among children of mothers who were covered by standard Medicaid at the time that they gave birth (fig. S11 and table S15). These

mothers should not be affected by DACA eligibility, given that standard Medicaid in Oregon is open only to low-income U.S. citizens and long-term lawful permanent residents. This check again underscores that in the absence of changes in DACA eligibility, there is no evidence of confounders associated with having a mother who is born just before or after the cutoff date that could explain the observed post-DACA difference in child mental health outcomes.

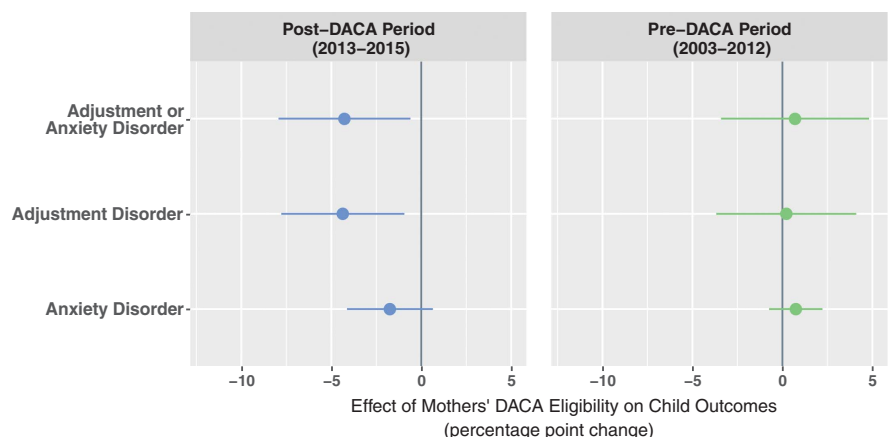
Because health care utilization could be affected by immigration status (9), we also checked for the possibility that the drop in diagnoses reflects a DACA-induced change in health care visits, which could affect the probability of detection of mental health disorders. We found no support for this. Mothers' DACA eligibility had no discernible impact on their children's health care utilization during the post-DACA period, as measured either by the total number of visits, the number of emergency room (ER) and urgent care visits, or the number of outpatient visits (fig. S12 and table S16). Consistent with this, in a non-prespecified analysis, we also found that the effects of mothers' DACA eligibility on child mental health were similar when we restricted the sample to children who had at least one health care visit in the post-DACA period (fig. S13 and table S17).

Our results provide causal evidence supporting the theory that parental unauthorized immigration status has important intergenerational effects on the well-being and development of children in immigrant families (4, 6). Protecting unauthorized immigrants from deportation led to immediate and sizable improvements in the

mental health of their U.S. citizen children. This suggests that parents' unauthorized status is a substantial stressor that stymies normal child development and perpetuates health inequalities by transferring parental disadvantages to children.

Our findings have important implications for immigration and health care policy. As decision-makers evaluate whether to maintain, cancel, or expand the DACA program, our results suggest that a broader consideration is needed, one that goes beyond the impacts for recipients alone and takes into account the intergenerational consequences of deferred action for the health of unauthorized immigrants' children, most of whom are U.S. citizens (2). Early childhood exposure to stress and adversity does not only cause poor health and impaired development in the short term; the issues can also persist into adulthood. Anxiety and psychosocial stress are identified as risk factors for depression, substance abuse, cardiovascular diseases, and obesity (32, 34, 39, 40). Treatment of mental disorders also carries considerable economic costs to society. They account for the highest total health care expenditures of all children's medical conditions (41) and are associated with poor long-term outcomes for school performance and welfare reliance (33, 42). By reducing mental health problems, deferred action has important multiplier effects through improving the future prospects of the children of unauthorized immigrants.

Our results imply that expanding deferred action to the millions of unauthorized immigrant parents who do not meet the current DACA eligibility criteria could further promote the



**Fig. 2. Effect of mothers' DACA eligibility on their children's mental health.** (Left) Mothers' DACA eligibility reduced child mental health disorders in the post-DACA period. (Right) There were no systematic, preexisting differences in the pre-DACA period. Circles with lines represent effect estimates with 95% confidence intervals from the regression discontinuity design, based on local linear regressions fitted to samples of children whose mothers' birthdates were within a symmetric bandwidth of days around the DACA eligibility cutoff. The size of the bandwidth was determined by an adaptive bandwidth selection algorithm for each outcome. The bandwidths and sample sizes for the three outcomes in the post-DACA period (top to bottom) are  $\pm 199$  days around the cutoff ( $n = 3039$  children),  $\pm 180$  days ( $n = 2741$ ), and  $\pm 132$  days ( $n = 2002$ ); for the pre-DACA period (top to bottom), the bandwidths and sample sizes are  $\pm 108$  days ( $n = 1325$ ),  $\pm 109$  days ( $n = 1338$ ), and  $\pm 211$  days ( $n = 2745$ ).



health and well-being of this next generation of American citizens. Moreover, it is reasonable to expect that permanent legal status or a pathway to citizenship would have an equal, if not greater, effect on improving children's health.

Our study also has implications for health policy research. Unauthorized immigration is an important policy issue, but researchers have struggled to generate a reliable evidence base. Although we recognize the limitations of evaluating health outcome data from one state, our sampling strategy of using Emergency Medicaid mothers and Medicaid children provides an effective way to overcome some of the challenges in collecting systematic data from the unauthorized population. This approach opens the door for future studies to examine the impacts of an array of local, state, and federal policies that affect unauthorized immigrant parents and that may have health consequences for their children.

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#### SUPPLEMENTARY MATERIALS

[www.sciencemag.org/content/357/6355/1041/suppl/DC1](http://www.sciencemag.org/content/357/6355/1041/suppl/DC1)  
Materials and Methods  
Supplementary Text  
Figs. S1 to S13  
Tables S1 to S17  
References (43, 44)  
Preregistered Analysis Plan

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

20 THE REGENTS OF THE UNIVERSITY OF  
21 CALIFORNIA and JANET NAPOLITANO,  
22 in her official capacity as President of the  
23 University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND  
26 SECURITY and ELAINE DUKE, in her  
27 official capacity as Acting Secretary of the  
28 Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

**DECLARATION OF ALISA HARTZ**

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,  
  
Plaintiffs,  
  
v.  
  
U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,  
  
Plaintiffs,  
  
v.  
  
UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,  
  
Defendants.

CASE NO. 17-CV-05380-WHA

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<p>COUNTY OF SANTA CLARA and SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 521,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>DONALD J. TRUMP, in his official capacity as President of the United States, JEFFERSON BEAUREGARD SESSIONS, in his official capacity as Attorney General of the United States; ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security; and U.S. DEPARTMENT OF HOMELAND SECURITY,</p> <p style="text-align: center;">Defendants.</p>
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CASE NO. 17-CV-05813-WHA

**DECLARATION OF ALISA HARTZ**

I, ALISA HARTZ, declare as follows:

1. I am a Staff Attorney at Public Counsel Opportunity Under Law. Public Counsel is the nation's largest not-for profit law firm specializing in delivering pro bono legal services. Founded in 1970, Public Counsel provides quality legal representation to disadvantaged children, immigrants who have been the victims of torture, persecution, domestic violence, trafficking, and other crimes, as well as individuals and institutions in underserved communities. I have personal knowledge of the facts set forth in this declaration, and if called as a witness, I could and would competently testify to them.

2. Prior to joining Public Counsel, I was a student law clerk at Public Counsel and at the ACLU of Southern California. I served as a law clerk to the Hon. Dean D. Pregerson of the United States District Court for the Central District of California, and for the Hon. Stephen Reinhardt of the United States Court of Appeals for the Ninth Circuit. I graduated from the University of California, Irvine, School of Law in 2012, and am a member in good standing of the California bar.

3. I have known Viridiana Chabolla (Viri) since September 2014, when I became an attorney at Public Counsel. Over the course of almost three years, Viri worked closely with me and several other lawyers in our unit to develop and pursue innovative education equity and civil rights litigation as a community organizer in Public Counsel's Opportunity Under Law project.

4. Viri made an enormous impact on Public Counsel's clients. She cares deeply about the rights of underserved communities that our cases serve and worked tirelessly to help to advance those rights. Viri's organizing work was essential to our understanding of the on-the-ground situation in the Los Angeles community. Through the relationships she developed with individuals and community partners, we were able to better understand the communities that we were attempting to serve. Viri was an extremely effective organizer because she could connect with so many types of people, engage with and understand their concerns, and develop and maintain relationships with them.

5. Viri is a person of the utmost integrity and who possesses a deep passion for justice. She is kind and caring and always treats other people with dignity and respect. The fact that she would maintain consistent contact with clients long after a case was over demonstrates her enduring commitment to improving lives. She never simply does a job; she does it with heart.

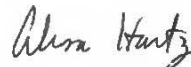
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6. I spoke with Viri multiple times about her interest in serving the public as an attorney. Her highest priorities were doing good in the world for vulnerable communities and staying close to her family. We discussed her law school options and possible trajectories for a career in public interest.

7. My understanding is that if DACA is rescinded, Viri will not be able to be hired as a public interest attorney when she graduates from law school. This would be a major loss to the Los Angeles community as a whole. Viri has a unique set of talents and experiences that will allow her to serve a wide range of people with compassion and intelligence.

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

Executed on October 27, 2017, in Los Angeles, California.



ALISA HARTZ

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

20 THE REGENTS OF THE UNIVERSITY OF  
21 CALIFORNIA and JANET NAPOLITANO,  
22 in her official capacity as President of the  
23 University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND  
26 SECURITY and ELAINE DUKE, in her  
27 official capacity as Acting Secretary of the  
28 Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

**DECLARATION OF DANIEL HELGUERA**

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,  
  
Plaintiffs,  
  
v.  
  
U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,  
  
Plaintiffs,  
  
v.  
  
UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,  
  
Defendants.

CASE NO. 17-CV-05380-WHA

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<p>COUNTY OF SANTA CLARA and SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 521,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>DONALD J. TRUMP, in his official capacity as President of the United States, JEFFERSON BEAUREGARD SESSIONS, in his official capacity as Attorney General of the United States; ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security; and U.S. DEPARTMENT OF HOMELAND SECURITY,</p> <p style="text-align: center;">Defendants.</p>
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CASE NO. 17-CV-05813-WHA

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I, DANIEL HELGUERA, DECLARE:

1. I am a math teacher at Theodore Roosevelt Senior High School (“Roosevelt High”) in the Boyle Heights neighborhood of Los Angeles, California. Roosevelt High is part of the Los Angeles Unified School District. I am also an alumnus of Roosevelt High’s Class of 1990. In addition to teaching math at Roosevelt High, I am also the school’s basketball coach.

2. I have personal knowledge of the facts set forth in this declaration, and if called as a witness, I could and would competently testify to them.

3. I first met Saul Jimenez in 2012, while I was teaching and coaching at Roosevelt High and he was working as a coordinator for the HealthCorps program there, through which he provided health education to students. A few years later, Mr. Jimenez got his college degree and was able to substitute teaching at the school as well. At that time, he was also an assistant varsity football coach. He later became the head junior varsity football coach.

4. Mr. Jimenez is also an alumnus of Roosevelt High. Although I did not know him personally when he was a student, I know that he had an extremely positive reputation amongst the other teachers.

5. My colleagues and I at Roosevelt High have the utmost respect for Mr. Jimenez as a colleague and coach. He is very respectful to his colleagues and a great role model to the students and student athletes. As an alumni of Roosevelt High and a product of the surrounding community who has been very successful both on and off the field, Mr. Jimenez is an inspiration to the students with whom he interacts. The student athletes have only positive things to say about Mr. Jimenez, and it is clear that they admire him.

6. I particularly respect that Mr. Jimenez went above and beyond during his time as a coach at Roosevelt to ensure that his football players were as successful in the classroom as they were on the field. If one of my math students was not trying hard in my class and he was also on the football team, I would approach Mr. Jimenez and let him know about the problem that I was having with the student. Mr. Jimenez would intervene quickly, emphasizing the importance of academics to the student, and the next day the student would come in to math class ready to work. Mr. Jimenez always made sure that his

1 players knew that academics are a top priority, even above athletics, and that there were consequences to  
2 neglecting their education.

3 7. Mr. Jimenez's intervention with his players and concern for their well-being made a  
4 tremendous difference in their well-being and in our community overall. Roosevelt High's student  
5 population largely comes from a poverty-stricken environment. Unfortunately, the poverty level in  
6 Boyle Heights is high and the area is gang-infested. Teenagers walking home from school often pass  
7 through two or three different neighborhoods where they could fall victim to gang violence or gang  
8 influence. As teachers and coaches in the neighborhood, we fight the pressures and dangers of gang  
9 violence and influence on a daily basis. It is critical for students to have someone like Mr. Jimenez as a  
10 mentor and coach to educate them about the dangers of gangs, to encourage them to stay out of trouble,  
11 and to push them to do better if they do get in trouble. As a fellow member of the community and  
12 alumnus of Roosevelt High, Mr. Jimenez has the students' respect because he understands what it is like  
13 to be in their shoes. Mr. Jimenez's experience gives him credibility with the students, which enables  
14 him to keep them off the streets and in the classroom.

15 8. It is my understanding that Mr. Jimenez will not be able to continue working in the  
16 school district or as a coach if he loses his work authorization due to discontinuation of the Deferred  
17 Action for Childhood Arrivals ("DACA") program.

18 9. Losing Mr. Jimenez as a teacher and coach will have a devastating impact on the Boyle  
19 Heights community. We have always pushed to have "homegrown" people like Mr. Jimenez teach and  
20 coach at Roosevelt High and at the surrounding schools because, as products of our community, they  
21 can uniquely relate to our students and inspire them to succeed. And we very much consider Mr.  
22 Jimenez to be "homegrown"

23 10. Mr. Jimenez also fundamentally understands the dangers that exist for students if they do  
24 not have positive role models who are invested in their future. It is difficult for schools like Roosevelt  
25 High to find educators who are willing to work in a challenging, sometimes dangerous environment, and  
26 it is even more difficult for Roosevelt to find those educators who are also "homegrown" products of the  
27 community. If Mr. Jimenez is not allowed to continue pursuing his goal of becoming an educator, he  
28 will not be able to provide the guidance and support that our students so desperately need. It will be

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extremely difficult if not impossible to find someone of similar background, skill, and dedication to fill his shoes.

11. I believe the discontinuation of DACA will also have a tremendous negative impact on our community more broadly. Many in our community, including current and former Roosevelt High students like Mr. Jimenez, are undocumented. Programs like DACA inspire our students to invest in their education and long-term career goals because they have confidence that they will not be deported unless they commit a crime. Discontinuation of DACA will also deprive Roosevelt High and our Boyle Heights community of the wealth of undocumented young people who have made long-term investments in their careers with the objectives of returning to help improve our community and its future.

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

Executed on October 27, 2017, in Los Angeles, California.



Daniel Helguera

# **EXHIBIT 39**

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18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SAN FRANCISCO DIVISION**

21 THE REGENTS OF THE UNIVERSITY OF  
CALIFORNIA and JANET NAPOLITANO,  
22 in her official capacity as President of the  
University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND  
SECURITY and ELAINE DUKE, in her  
26 official capacity as Acting Secretary of the  
Department of Homeland Security,

27 Defendants.  
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CASE NO. 17-CV-05211-WHA

**DECLARATION OF RALPH J. HEXTER**



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STATE OF CALIFORNIA, STATE OF  
MAINE, STATE OF MARYLAND, and  
STATE OF MINNESOTA,  
  
Plaintiffs,  
  
v.  
  
U.S. DEPARTMENT OF HOMELAND  
SECURITY, ELAINE DUKE, in her official  
capacity as Acting Secretary of the Department  
of Homeland Security, and the UNITED  
STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, President of the United  
States, in his official capacity, ELAINE C.  
DUKE, in her official capacity, and the  
UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ  
AVILA, SAUL JIMENEZ SUAREZ,  
VIRIDIANA CHABOLLA MENDOZA,  
NORMA RAMIREZ, and JIRAYUT  
LATTHIVONGSKORN,  
  
Plaintiffs,  
  
v.  
  
UNITED STATES OF AMERICA, DONALD  
J. TRUMP, in his official capacity as President  
of the United States, U.S. DEPARTMENT OF  
HOMELAND SECURITY, and ELAINE  
DUKE, in her official capacity as Acting  
Secretary of Homeland Security,  
  
Defendants.

CASE NO. 17-CV-05380-WHA

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COUNTY OF SANTA CLARA and  
SERVICE EMPLOYEES INTERNATIONAL  
UNION LOCAL 521,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, in his official capacity  
as President of the United States, JEFFERSON  
BEAUREGARD SESSIONS, in his official  
capacity as Attorney General of the United  
States; ELAINE DUKE, in her official  
capacity as Acting Secretary of the Department  
of Homeland Security; and U.S.  
DEPARTMENT OF HOMELAND  
SECURITY,  
  
Defendants.

CASE NO. 17-CV-05813-WHA

1 I, RALPH J. HEXTER, DECLARE:

2 1. I graduated *magna cum laude*, with a Bachelor of Arts degree in English and American  
3 Languages and Literatures from Harvard College in 1974. I hold a Master of Arts in Classics and  
4 Modern Languages from Corpus Christi College, Oxford University, and a Masters of Philosophy and a  
5 Ph.D in Comparative Literature from Yale University.

6 2. I have held various academic positions at Yale University (1981-1991) and the University  
7 of Colorado, Boulder (Professor of Classics and Comparative Literature, Director, Graduate Program in  
8 Comparative Literature, 1991-1995). At the University of California, Berkeley, I served as Professor of  
9 Classics and Comparative Literature (1995-2005), Chair of Comparative Literature (1996-1998), Dean  
10 of Humanities (1998-2005) and Executive Dean of the College of Letters and Sciences (2002-2005). I  
11 served as President of Hampshire College in Amherst, Massachusetts, from August 2005 through  
12 December 2010.

13 3. Currently, I serve as Provost and Executive Vice Chancellor at the University of  
14 California, Davis, a position I took up on January 1, 2011. (Between April 2015 and July 2017, I served  
15 as Acting and then Interim Chancellor of the University.) In my capacity as Provost and Executive Vice  
16 Chancellor, I have personal knowledge of the facts to which I attest in this declaration. In that role, I  
17 have primary responsibility for the academic functioning of the Davis Campus and have many  
18 responsibilities related to advancing and maintaining the University's multidimensional academic  
19 excellence.

20 4. The University as a whole, and UC Davis, in particular, are widely cited for excellence  
21 across a wide array of disciplines and measures. For example, according to the latest U.S. News &  
22 World Report rankings, UC Davis is recognized as a top-10 national university based on contributions to  
23 the "public good," defined as social mobility (recruiting and graduating low-income students), research  
24 (producing cutting-edge scholarship and Ph.Ds.), and service (encouraging students to give something  
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1 back to their country). Moreover, last year, UC Davis was ranked among the top 10 college campuses in  
 2 the country for providing social and economic mobility to its students.<sup>1</sup>

3 5. The California Constitution gives the University's Board of Regents "full powers of  
 4 organization and governance" of the University, subject to only narrow legislative control.<sup>2</sup> The Board  
 5 of Regents has adopted Bylaws establishing responsibilities for governance of the University. Bylaw 40  
 6 recognizes that the University faculty participate in the shared governance of the University, through the  
 7 agency of the Academic Senate, to ensure the quality of instruction, research and public service at the  
 8 University and to protect academic freedom. The University Bylaws call for the Academic Senate to  
 9 perform such duties and exercise such powers as the Board may direct, including, subject to the approval  
 10 of the Board, the power to "determine the conditions for admission and for certificates and degrees."  
 11 Consistent with the value the University places on academic freedom, the Board of Regents has  
 12 empowered the Senate to "authorize and supervise all courses and curricula."<sup>3</sup> Finally, the Academic  
 13 Senate is empowered to "determine the membership of the several faculties and councils."<sup>4</sup> In exercise  
 14 of its responsibilities for shared governance of academic decision making, the Academic Senate sets the  
 15 academic criteria for the high school courses that applicants must demonstrate that they have completed.

16 6. Among my many responsibilities as Provost at UC Davis and the primary academic  
 17 administrator for the campus, I serve as the Chancellor's Principal Liaison to the System-Wide Provost  
 18 in the Office of the University President. I also serve as the Chancellor's Principal Liaison to the Davis  
 19 Division of the Academic Senate and the Deans and Department Heads of academic departments. Via  
 20 established norms of shared governance at UC, the Academic Senate is responsible for setting overall

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 22 <sup>1</sup> See David Leonhardt, *California's Upward-Mobility Machine*, NY Times (Sept. 16, 2015),  
 23 [https://www.nytimes.com/2015/09/17/upshot/californias-university-system-an-upward-mobility-](https://www.nytimes.com/2015/09/17/upshot/californias-university-system-an-upward-mobility-machine.html)  
 24 [machine.html](https://www.nytimes.com/2015/09/17/upshot/californias-university-system-an-upward-mobility-machine.html).

25 <sup>2</sup> Cal. Const., Article IX, Section 9.

26 <sup>3</sup> University of California Bylaw 40.1, *Duties and Powers of the Academic Senate*.

27 <sup>4</sup> University of California Standing Order 105.2(c): *Duties, Powers, and Privileges of the Academic*  
 28 *Senate*.

1 undergraduate admissions standards and approving the admissions process, the implementation of which  
2 is overseen by the administration. Admissions into graduate programs is more decentralized, but  
3 decisions by members of the Academic Senate in the various departments and programs are  
4 determinative. The Academic Senate has primary responsibility for setting degree requirements and  
5 approving and monitoring the quality of the curriculum and the courses that are taught. The  
6 administration, through the structure of college and school deans and department chairs oversees the  
7 delivery of the curriculum. The administration is the final authority on appointments, promotion and  
8 tenure, based on evaluations and recommendations of various panels of Academic Senate members.  
9 Maintaining and enhancing the University's quality and its reputation for academic excellence is a  
10 shared endeavor.

11 7. Undocumented students enter the undergraduate student body at UC Davis by  
12 demonstrating that they have met the standards for academic preparation and excellence reflected in the  
13 University's admissions requirements and as a result of the University's non-discrimination policies.<sup>5</sup>  
14 UC Davis has high standards for selecting students, admitting only 42% of freshman applicants with a  
15 weighted GPA range of 3.92 to 4.23. The University's admissions requirements and non-discrimination  
16 policies reflect the exercise of academic freedom jointly exercised by the Academic Senate and the  
17 University Administration. Undocumented students advance through the undergraduate curriculum in  
18 the subject matter of their choice by meeting, in the judgment of the University faculty, the same  
19 requirements for completion of coursework and requirements for their chosen major that apply to all  
20 other students. By University policy, we do not stand in the way of the academic progress of  
21 undocumented students; rather, we support them to progress successfully toward completion of their  
22 degree and development of their future career ambitions.

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25 <sup>5</sup> See *UC Davis Freshman Admission Requirements*,  
26 <https://www.ucdavis.edu/admissions/undergraduate/freshman/requirements> (last visited Oct. 20, 2017);  
27 *UC Nondiscrimination Statement*, [http://www.ucop.edu/operating-budget/fees-and-enrollments/policies-](http://www.ucop.edu/operating-budget/fees-and-enrollments/policies-and-resources/nondiscrimination-statement.html)  
28 [and-resources/nondiscrimination-statement.html](http://www.ucop.edu/operating-budget/fees-and-enrollments/policies-and-resources/nondiscrimination-statement.html) (last visited Oct. 20, 2017).

1           8.       As with undergraduates, undocumented students enter the graduate and professional  
2 student body at UC Davis by meeting the standards for academic preparation and excellence that are  
3 required by the various programs, schools and departments of the University. Some graduate programs  
4 require applicants to identify general research interests or even specific research proposals before  
5 gaining admission to the program. Our faculty and academic departments evaluate the research interests  
6 and proposals of prospective graduate students during the admissions process to evaluate, among other  
7 things, how well those interests and proposals will serve and advance the needs and development of the  
8 department. As with our undergraduate programs, our graduate programs are very selective when it  
9 comes to the academic acumen of admitted students, admitting on average only 25% of applicants with  
10 an average undergraduate GPA of 3.55. UC Davis also receives graduate studies applications from all  
11 over the world, including all fifty states and ninety-seven different countries, for the 2017-2018  
12 academic year.

13           9.       The University has long recognized that a diversity of backgrounds in its student  
14 population enriches the educational experiences of all. To that end, the University seeks to fill its  
15 academic communities with students who are academically and personally talented and representative of  
16 the diverse state of California.<sup>6</sup> The University believes that a diverse student body creates a fuller  
17 educational experience. When the University's students and faculty learn to interact effectively with  
18 individuals from different backgrounds who have perspectives different from their own, those  
19 individuals are better prepared to participate in our increasingly diverse workforce and society.<sup>7</sup>

20           10.       Students who cannot afford the total cost of attendance at UC Davis are nonetheless  
21 required to pay a portion of the costs of attendance according to uniform evaluation of financial need. I  
22 am informed and believe that many of the undocumented students at UC Davis have very substantial  
23 financial need and that many of these students rely on work authorization obtained through the DACA  
24 program in order to pay their share of the total cost of attendance. I am further informed and believe that

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27 <sup>6</sup> See Regents Policy 2102, *Policy on Undergraduate Admissions*.

28 <sup>7</sup> See Regents Policy 4400, *Policy on University of California Diversity Statement*.

1 many undocumented students who rely on DACA work authorization to pay their share of the total cost  
2 of attendance would be unable to continue with their studies without income from their work.

3 11. The University relies on the skills and ability of our graduate students to carry out  
4 teaching and research responsibilities in collaboration with members of the faculty. To varying degrees  
5 in different graduate and professional programs, the academic work of the University simply cannot  
6 advance without the teaching and research work of our graduate student body. Graduate students play an  
7 integral role in the teaching and research missions of the University. Last year, the University received  
8 just over \$780 million in research funding, a substantial portion of which supports the nearly 1,500  
9 graduate students who are actively engaged in research. Additionally, the University employs over 1,700  
10 teaching assistants who work closely with our faculty in teaching the University's large undergraduate  
11 population. In addition, the experience of working as a teaching assistant or research assistant is a  
12 strongly encouraged, if not essential, aspect to completing degree requirements in many UC Davis  
13 graduate programs. For example, the UC Davis Department of English requires doctoral candidates to  
14 have completed at least one year of teaching at the college level, and the Biochemistry, Molecular,  
15 Cellular and Developmental Biology Graduate Group requires doctoral candidates to work as a teaching  
16 assistant for at least one undergraduate biochemistry or molecular biology course. Additionally, many  
17 science graduate programs, including the Graduate Group in Immunology, will incorporate employment  
18 as a graduate student researcher as part of a Ph.D. student's academic plan.

19 12. By interfering with the ability of students to pay their share of the total cost of attendance  
20 at UC Davis as undergraduate and graduate students, the rescission of DACA will likely cause some UC  
21 Davis students who have DACA authorization to leave the student body. It is possible that UC Davis  
22 will have classrooms that lose their teaching assistants and faculty who lose their research assistants as  
23 of March 6, 2018. The rescission may also deter undocumented students from competing to enter the UC  
24 Davis student body. These losses not only frustrate the personal ambition of the students; they also  
25 frustrate the University's exercise of its academic freedom, as reflected in the thousands of academic  
26 decisions the University has made to admit, advance, employ, and award degrees to our diverse student  
27 body according to our students' academic work meeting the University's academic standards.  
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1           13.    In some graduate and professional programs, travel abroad is important to a student's  
2 ability to complete their studies. For example, students in comparative studies benefit when they visit  
3 the countries they are analyzing. Students focused on languages or literature from specific regions  
4 benefit from immersive experiences that can only happen internationally. Students with research focused  
5 on or in other countries find travel to be an essential element of their work. Undocumented students  
6 depend on advance parole to benefit from and fulfill relevant degree requirements. Many UC Davis  
7 undergraduate students also take advantage of opportunities to travel abroad in order to fulfill their  
8 program and/or graduation requirements. This year alone, 1,271 students participated in the study abroad  
9 program. Without advance parole, undocumented students will be unable to take advantage of these  
10 opportunities, even where they would support or fulfill requirements of their desired major or degree.

11           14.    Some of the University's DACA recipients serve as teaching assistants, helping educate  
12 their peers. Some work as research assistants, making discoveries and drawing connections that improve  
13 the learning outcomes of others. The rescission of the DACA program will result in the expiration of  
14 qualified educators' work authorization. The University will accordingly be unable to retain and hire  
15 qualified researchers and educators for positions that are critical to the University's teaching, research  
16 and service mission. Their loss undermines the thousands of academic decisions the University has  
17 made to admit, advance, employ, and award degrees to our diverse student body according to our  
18 students' academic work meeting the University's academic standards.

19           15.    In conclusion, the rescission of the DACA program interferes with the University's  
20 academic decisions about who may be taught, what may be taught, how material is taught and who may  
21 do the teaching.

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

24           Executed on **October 24, 2017** in **Davis, California**.

25   
26 \_\_\_\_\_  
27 RALPH J. HEXTER  
28



# **EXHIBIT 40**

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

THE REGENTS OF THE UNIVERSITY OF  
CALIFORNIA and JANET NAPOLITANO,  
in her official capacity as President of the  
University of California,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND  
SECURITY and ELAINE DUKE, in her  
official capacity as Acting Secretary of the  
Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

**DECLARATION OF DR. ROBIN HOLMES-SULLIVAN**

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,  
  
Plaintiffs,  
  
v.  
  
U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,  
  
Plaintiffs,  
  
v.  
  
UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,  
  
Defendants.

CASE NO. 17-CV-05380-WHA

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<p>COUNTY OF SANTA CLARA and SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 521,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>DONALD J. TRUMP, in his official capacity as President of the United States, JEFFERSON BEAUREGARD SESSIONS, in his official capacity as Attorney General of the United States; ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security; and U.S. DEPARTMENT OF HOMELAND SECURITY,</p> <p style="text-align: center;">Defendants.</p>
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CASE NO. 17-CV-05813-WHA

1 I, ROBIN HOLMES-SULLIVAN, DECLARE:

2 1. I am the Vice President for Student Affairs at the University of California (“UC”). The  
3 matters set forth herein are true and correct of my own personal knowledge and, if called as a witness, I  
4 could and would testify competently thereto.

5 2. In my role as Vice President, I oversee the overall student experience across UC’s  
6 campuses, and I work closely with the UC President and Provost in efforts to enhance the diversity,  
7 experiences, and successes of UC students, especially undergraduate students. This includes not only  
8 overseeing the UC undergraduate application process for admissions and financial support program, but  
9 also monitoring diversity and campus climate, overseeing student mental health and wellness,  
10 overseeing policies guiding student conduct, student activities, admissions and financial aid, and also  
11 serving as an intermediary between UC campuses, UC Office of the President, and student  
12 groups/leadership. In my role, I visit all UC campuses on a regular basis, where I meet and talk with  
13 faculty, staff and students. My office provides overall guidance and support to a plethora of Presidential  
14 Initiatives carried out on each of the campuses, including the President’s Advisory Council on  
15 Undocumented Students, Student Veterans, LGBT Students, Faculty and Staff, the Global Climate  
16 Leadership Council, the California Community College Transfer Initiative, and the Global Food  
17 Initiative, to name a few. I enjoy a close working relationship with different individuals across our  
18 campuses, including student leaders and each Vice Chancellor of Student Affairs.

19 3. In my role, I have observed and heard firsthand about the abilities and experiences of  
20 DACA students, as well as how the announced rescission of the DACA policy has affected them. UC  
21 data shows that with the implementation of DACA in 2012, the first-year persistence rate (i.e., percent  
22 of students continuing on to the second year) increased significantly for these students who could count  
23 on receiving financial aid, and no longer feared deportation.

24 4. Our DACA students are very talented and make important contributions to the State of  
25 California and the United States as a whole. From August 1, 2017 to August 20, 2017, Tom K. Wong of  
26 the University of California, San Diego; United We Dream (UWD); the National Immigration Law  
27 Center (NILC); and the Center for American Progress fielded a national survey to further analyze the  
28 economic, employment, educational, and societal experiences of DACA recipients. This is the largest

1 study to date of DACA recipients with a sample size of 3,063 respondents in 46 states as well as the  
2 District of Columbia. The data illustrate that DACA recipients continue to make positive and significant  
3 contributions to the economy, including earning higher wages, which translates into higher tax revenue  
4 and economic growth that benefits all Americans  
5 ([https://www.americanprogress.org/issues/immigration/news/2017/08/28/437956/daca-recipients-  
6 economic-educational-gains-continue-grow/](https://www.americanprogress.org/issues/immigration/news/2017/08/28/437956/daca-recipients-economic-educational-gains-continue-grow/)).

7 5. Additionally, our undocumented and DACA graduate students make amazing  
8 contributions to medicine and technology, including through discoveries that have the potential to help  
9 communities throughout California. For instance, one of our former DACA PhD students researched the  
10 indicators for sudden cardiac death—the leading natural cause of death in Americans. This vital research  
11 has the potential to save countless lives.

12 6. Due to their talent and chosen fields of study, DACA students serve as academic role  
13 models to other students across UC’s campuses. DACA students at all 10 of the campuses serve as  
14 teaching assistants (“TAs”). There are, for instance, four DACA-recipient PhD students at UC Merced  
15 who work as TAs. At UC Merced, 55 percent of the baccalaureate degrees awarded are in science,  
16 technology, and math, and several of the DACA PhD students’ focuses lie in those fields. The industries  
17 that students and graduate students with science, technology, or math degrees enter are among the least  
18 diverse sectors of the economy  
19 ([http://www.air.org/sites/default/files/downloads/report/AGEP\\_Lit\\_Review\\_10-26-09\\_0.pdf](http://www.air.org/sites/default/files/downloads/report/AGEP_Lit_Review_10-26-09_0.pdf)), and part  
20 of both the University and UC Merced’s mission to diversify historically non-diverse industries. Our  
21 DACA-recipient TAs not only promise to diversify those fields upon entering the workforce, but they  
22 also serve as inspiration to the diverse undergraduate students in their classes that careers in those fields  
23 are attainable for them, too.

24 7. Our undocumented and DACA students’ influence is not limited to the classroom. Many  
25 serve as role models in the broader community. Some of our campuses are located in regions of the state  
26 where a fair percentage of K-12 students are undocumented youth or members of the migrant farm  
27 community. We have DACA-recipients who volunteer at these K-12 schools, showing local children  
28 that a college education is attainable and worthwhile.

1           8.       UC values diversity, and exposure to other perspectives is a critical part of a complete  
2 education. Developing robust cultural competency requires exposure to different cultures and  
3 viewpoints, and exposing others to the viewpoints of DACA recipients is an important component of  
4 that. Indeed, our undocumented and DACA students are vital members of our community. We have  
5 DACA students who serve as leaders of local chapters of national Greek Societies and in various student  
6 clubs, are influential student leaders and serve in student government, and are heavily involved in  
7 important events, such as performing the national anthem at school commencements. Through this  
8 engagement—both in the classroom and around campus—DACA students interact with many people  
9 and are able to share their unique perspectives with them. This enriches the social and educational  
10 environment for all. The valuable cultural exchange would be impoverished if undocumented students—  
11 including DACA recipients—were not on campus or were not as willing to share their stories and  
12 perspectives.

13           9.       DACA recipients are often model students on campus and are valuable to UC. Not only  
14 do undocumented students perform very well academically, but also they are highly involved in other  
15 aspects of student life and have few disciplinary issues. For example, at UC Santa Barbara, University  
16 Service Awards are given each year to recognize the contributions and achievements of outstanding  
17 graduating seniors and graduate students who have performed above and beyond the call of duty in  
18 service to the University, the student body, and the community or have succeeded while facing  
19 extraordinary challenges. For the 2016-17 year, several of the annual University Service Awards were  
20 given to DACA recipients.

21           10.       The announcement to rescind the DACA policy has created several harms. Our students  
22 report stressors ranging from a fear of deportation, increased discrimination, and the possibility of being  
23 unable to continue their studies. The most instantly recognizable impact for me—other than the various  
24 psychological and emotional strains our DACA recipients report—is our current inability to provide our  
25 students with the counseling resources they need.

26           11.       I have spoken with DACA students who are afraid that they or their family members will  
27 be detained or deported. One DACA student explained that she did not feel safe driving from campus to  
28 her parents' house because doing so required passing through an immigration checkpoint. She is afraid

1 that immigration officers will learn her identity and follow her home or to campus. Not only is she  
2 scared, but her fear is preventing her from visiting her family, a valuable support network for her. This is  
3 not a unique story. This climate of fear has intensified since the announcement to rescind the DACA  
4 policy.

5 12. We have observed an increase in anti-immigrant incidents on campus following the 2016  
6 presidential election and the announcement to rescind DACA. On multiple occasions, racist posters  
7 targeted at immigrants have been put up on campuses overnight. There have also been several incidents  
8 where UC students are presumed to be immigrants and yelled at that they “do not belong” and that they  
9 should “go home.” Our DACA students are afraid that they will be harassed or attacked because of their  
10 immigration status or the fact that they “look like immigrants.”

11 13. The uncertainty of being able to pay for school is also a significant source of stress for  
12 our students. Financial aid often covers part of the full tuition for DACA students, but students are  
13 expected to pay for some of the cost—approximately \$10,000—out of their own pockets. Many DACA  
14 recipients thus rely on their ability to work, pursuant to work authorization, to pay for this cost of  
15 attendance. Beyond the need to support themselves, some DACA recipients work to provide for their  
16 families. When this is the case, some DACA students view school as a lower priority than working to  
17 earn as much as possible before their DACA status—and consequently their work authorization—ends.

18 14. One consequence of all these stressors is that DACA students are presently unable to  
19 focus on their studies with the same intensity that they have in the past. I have heard from academic  
20 counselors who have observed a dip in the academic performance of DACA recipients since the  
21 rescission was announced. Professors are also concerned and report that many DACA students have  
22 reached out to them to report difficulty studying, completing assignments or focusing on their school  
23 work due to the stress they are experiencing. Our campus support staff have received a flood of emails  
24 from faculty who are concerned for their DACA students and are unsure how best to support them. We  
25 are working diligently to train our teachers about what resources exist and what they can do personally  
26 to help our DACA students.

27 15. The stress caused by rescission of the DACA policy has resulted in a dramatic increase in  
28 the number of requests from DACA students for mental health services. For example, at UC Merced,



1 over the weeks following the announcement to rescind DACA, demand for counseling services more  
2 than doubled from 11% of the total student population to 23% of the student population. At UC  
3 Berkeley, the number of appointments and walk-ins for mental health counseling increased by 90%  
4 following the announcement.

5 16. I have also heard from my staff and from DACA students themselves that we need  
6 psychologists and other experts who are familiar with the challenges faced by undocumented  
7 individuals. Again, we are devoting time and rerouting resources to address this. Doing so undoubtedly  
8 places more demands on these services by the campus community as a whole. On some campuses we  
9 have increased the number of full-time staff members and hired more peer counselors to staff our mental  
10 health facilities. We have also reached out to our local contacts and brought in attorneys to run “know  
11 your rights” workshops. We have also invested time and money into our UndocuAly training program,  
12 through which we teach our counselors and some of our faculty about what it means to be  
13 undocumented in this country. This better prepares our staff to provide our DACA students the services  
14 they need.

15 17. Our staff is working tirelessly to address the acute demand for services following the  
16 announcement to rescind the DACA policy. I have observed the increased hours and emotional toll that  
17 this has had on our staff as they try to provide DACA students with information and support, and I am  
18 concerned that staff members will burn out and seek employment elsewhere.

19 18. I and some of my colleagues are also concerned that the uncertainty surrounding the  
20 DACA policy will result in a loss of current and future students. For example, I have heard that two  
21 undergraduate students at UCLA called to cancel their enrollment after DACA’s rescission was  
22 announced. I have heard from several Vice Chancellors who are preparing for the possibility that DACA  
23 students will leave on an upcoming break from classes and will not return to school. Some of these  
24 students may decide not to return due to a desire to work and support their families while they can or to  
25 minimize the student debt they accrue before their DACA status expires. For others, though, the choice  
26 is out of their hands. Some families are deciding to leave the country and are taking their children with  
27 them. Still others depend on their DACA status for basic necessities. We have at least one DACA  
28 student who serves as a resident advisor, a position that comes with room and board but requires work

1 authorization. If this student loses their work authorization—which they will when their DACA status  
2 expires—they will lose their home.

3 19. Our PhD students and others will not be able to continue as TAs without work  
4 authorization. Being a TA is a full-year commitment, and part of a TA's compensation is graduate  
5 school tuition reduction. When these students lose DACA status, they can no longer be employed as  
6 TAs, and their tuition will be higher, directly impacting their ability to pay for graduate school. UC will  
7 also have to scramble to find replacement TAs to take over teaching responsibilities mid-term. This, like  
8 our other efforts, will require time, energy, and money on UC's part. But beyond the administrative  
9 costs, losing our DACA TAs also deprives us of their impact as role models to diverse undergraduates  
10 who might be considering advanced degrees in historically non-diverse fields. Accordingly, if we lose  
11 these diverse PhD candidates, then our commitment to diversifying these fields is harmed.

12 20. I, my staff, and the high school counselors we interact with are all concerned about a  
13 possible decrease in the number of undocumented applicants to UC as a result of the uncertainty created  
14 by the rescission of DACA. High school students are concerned about whether they will be accepted by  
15 their peers and the institution. They are also worried about the financial burden. As discussed, UC  
16 students need to cover some of the cost of attendance, and high school students are worried that, without  
17 work authorization, they will be unable to support themselves through school.

18 21. We are trying to respond to the possible loss of both current and future students by  
19 creating focused communication campaigns. Currently, we are ramping up our efforts to convince our  
20 current students that they belong here and that we are doing all we can to provide them the institutional  
21 support they need. One of our staff members is spending time writing and sending out weekly updates  
22 discussing DACA-related news and campus resources. Vice Chancellors are spending time personally  
23 reaching out to donors, trying to raise money that we can provide to undocumented students and DACA-  
24 recipients as stipends or grants.

25 22. In addition to diverting money, we are also spending time and energy making sure that  
26 qualified high school students who would normally apply to UC still do so this year. We have hosted  
27 outreach conferences around the state in order to provide information to address the current confusion  
28 and concern that exists among high school counselors and their students. Nevertheless, the fear and

1 uncertainty looms large and, according to our outreach counselors, is having a negative impact on the  
2 recruitment of students who have DACA, despite our positive messages.

3 23. We are also trying to secure replacement housing for the DACA RA who faces the  
4 looming threat of losing their home. Thus, we are rapidly diverting resources to address these serious,  
5 imminent harms.

6 24. We are not the only institution that has recognized these pending harms, but we are  
7 quickly deploying our resources to address them. Other educational institutions like local community  
8 colleges and high schools are concerned about the same issues and have reached out to us for help and  
9 advice creating their own resources or borrowing from our approach.

10 25. UC recognizes that the institution and broader community are harmed if we lose current  
11 students and qualified future students. By losing our undergraduate and graduate DACA students and by  
12 missing out on qualified students who would otherwise attend, we are losing inspiring individuals who  
13 have served as role models to various kinds of students, brilliant minds, and a source of diversity that is  
14 important to building cultural competency and diversifying traditionally non-diverse professions.

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

17 Executed on October 24, 2017 in Oakland, California.

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21 DR. ROBIN HOLMES-SULLIVAN

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

20 THE REGENTS OF THE UNIVERSITY OF  
21 CALIFORNIA and JANET NAPOLITANO,  
22 in her official capacity as President of the  
23 University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND  
26 SECURITY and ELAINE DUKE, in her  
27 official capacity as Acting Secretary of the  
28 Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

**DECLARATION OF MARCELA ZHOU  
HUANG**

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,  
  
Plaintiffs,  
  
v.  
  
U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,  
  
Plaintiffs,  
  
v.  
  
UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,  
  
Defendants.

CASE NO. 17-CV-05380-WHA

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COUNTY OF SANTA CLARA and  
SERVICE EMPLOYEES INTERNATIONAL  
UNION LOCAL 521,

CASE NO. 17-CV-05813-WHA

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity  
as President of the United States, JEFFERSON  
BEAUREGARD SESSIONS, in his official  
capacity as Attorney General of the United  
States; ELAINE DUKE, in her official  
capacity as Acting Secretary of the Department  
of Homeland Security; and U.S.  
DEPARTMENT OF HOMELAND  
SECURITY,

Defendants.

1 I, Marcela Zhou Huang, declare:

2 1. I live in Los Angeles, California and have resided in the United States for 14 years.

3 2. I was born in 1991 in Mexicali, Baja California, Mexico and was brought to the United  
4 States when I was 12 years old.

5 3. I attended school in California from 7th to 12th grade and graduated in 2009 as the  
6 Valedictorian of my senior class at Calexico High School.

7 4. I attended Imperial Valley College in Imperial, California from 2009 to 2010 and graduated  
8 in 2012 from the University of California, San Diego ("UCSD"), with a Bachelor of Science in Human  
9 Biology.

10 5. I am currently a medical student at the David Geffen School of Medicine at the University  
11 of California, Los Angeles ("UCLA"). I am enrolled in the UCLA PRIME program which is a five-year  
12 concurrent dual degree (Doctor of Medicine/Masters) program focusing on the development of leaders  
13 in medicine to address policy, care and research in healthcare for the underserved. Candidates for this  
14 program are evaluated using criteria that includes experience with and commitment to working with  
15 underserved populations as well as experience in leadership roles.

16 6. I will be applying for the Master's Program in Public Health for the 2018-2019 school year.

17 7. I was approved for Deferred Action for Childhood Arrivals ("DACA") and employment  
18 authorization in December 2012.

19 8. I have spent a large portion of my years in the United States in border towns with border  
20 patrols throughout the city, which led to a great amount of personal mental stress and fear. DACA has  
21 given me a sense of security that in turn gave me a voice to advocate for others who were in the same  
22 situation as me, especially in terms of access to health care.

23 9. As a DACA recipient with employment authorization, I was also able to obtain a job in my  
24 field prior to attending medical school. After receiving my work authorization, I applied for and was  
25 hired at UCSD as a clinical research coordinator in nephrology research.

26 10. My access to volunteer opportunities has also expanded significantly, and I was able to  
27 volunteer as a Spanish interpreter at the UCSD Student-Run Free Clinic for two years. UCSD Free  
28 Clinic provides free comprehensive medical care to its patients who would otherwise not be able to



1 access medical care. My work at the clinic solidified my desire to become a physician. I was also a  
2 student leader for a monthly health fair in the Linda Vista community, which consists primarily of low-  
3 income Asians and Latinos. As a student leader, I coordinated and planned the health fairs and managed  
4 various aspects of the clinic, including clinic flow and volunteer selection and training.

5 11. During medical school, I have been involved with the Student-Run Homeless Clinic at  
6 UCLA and served as one of the Community Education Chiefs during my second year. This role allowed  
7 me to work with our partners to provide our patients with education talks with the goal of reducing  
8 preventable conditions. I have also served as one of the organizers of an annual health fair in the Lennox  
9 community in Los Angeles and as a facilitator of the medical Spanish selective at my school for my  
10 fellow medical students and residents. In addition, I have been involved with UndocuMed Students and  
11 Allies (formerly known as MedDreamers) at UCLA to advocate for undocumented medical students and  
12 other health professionals.

13 12. As a DACA recipient, I have also had access to certain forms of student financial aid that  
14 would otherwise not be accessible to me, including private loans and scholarships that are available for  
15 students with DACA.

16 13. After receiving DACA, I was also able to obtain a driver's license and gained a sense of  
17 freedom that I did not have prior to DACA.

18 14. Since my current DACA expires in October 2018, I am now unable to renew under the  
19 current DACA termination policy.

20 15. The rescission of DACA brings uncertainty to my future in the United States and my future  
21 career as a physician. As a medical student, I am unsure if I would be able to finish medical school,  
22 obtain a residency, and become a practicing physician. Medical residencies are considered employment  
23 and require work authorization, which DACA has allowed me to have. Even if I am able to continue  
24 school, funding could become an issue as access to private loans for students with my immigration  
25 status thus far has required DACA documentation. If I am forced to drop out of medical school, I will  
26 also likely have to cease the community health work discussed above.

27 16. With or without DACA, I continue to have a responsibility to my future patients to focus on  
28 school and my training to become the best physician I can be. Medical school is not easy and will be

1 much more challenging if I have to fear for my safety and wonder if I will be able to remain in the  
2 United States, continue training, or obtain funding. If I lose DACA and the employment authorization  
3 that it allows me to obtain, even if I am able to continue school and obtain funding, I will not be able to  
4 seek a residency and become a practicing physician in the United States.

5  
6 I declare under penalty of perjury under the laws of the United States that the foregoing is  
7 true and correct.

8 Executed on October 25<sup>th</sup>, 2017, at Los Angeles, California.

9  
10 

11 Marcela Zhou Huang

# **EXHIBIT 42**

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

THE REGENTS OF THE UNIVERSITY OF CALIFORNIA and JANET NAPOLITANO, in her official capacity as President of the University of California,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY and ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

**DECLARATION OF EDWIN HUDSON**

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STATE OF CALIFORNIA, STATE OF  
MAINE, STATE OF MARYLAND, and  
STATE OF MINNESOTA,  
  
Plaintiffs,  
  
v.  
  
U.S. DEPARTMENT OF HOMELAND  
SECURITY, ELAINE DUKE, in her official  
capacity as Acting Secretary of the Department  
of Homeland Security, and the UNITED  
STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, President of the United  
States, in his official capacity, ELAINE C.  
DUKE, in her official capacity, and the  
UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ  
AVILA, SAUL JIMENEZ SUAREZ,  
VIRIDIANA CHABOLLA MENDOZA,  
NORMA RAMIREZ, and JIRAYUT  
LATTHIVONGSKORN,  
  
Plaintiffs,  
  
v.  
  
UNITED STATES OF AMERICA, DONALD  
J. TRUMP, in his official capacity as President  
of the United States, U.S. DEPARTMENT OF  
HOMELAND SECURITY, and ELAINE  
DUKE, in her official capacity as Acting  
Secretary of Homeland Security,  
  
Defendants.

CASE NO. 17-CV-05380-WHA

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COUNTY OF SANTA CLARA and  
SERVICE EMPLOYEES INTERNATIONAL  
UNION LOCAL 521,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, in his official capacity  
as President of the United States, JEFFERSON  
BEAUREGARD SESSIONS, in his official  
capacity as Attorney General of the United  
States; ELAINE DUKE, in her official  
capacity as Acting Secretary of the Department  
of Homeland Security; and U.S.  
DEPARTMENT OF HOMELAND  
SECURITY,  
  
Defendants.

CASE NO. 17-CV-05813-WHA

1 I, EDWIN HUDSON, declare:

2 1. My name is Edwin Hudson. I am a Deputy Commissioner for the Minnesota Department  
3 of Management and Budget (“MMB”), and I have held this position since February 2016. MMB is the  
4 chief personnel office of the executive branch of Minnesota state government. As such, in my role as  
5 MMB Deputy Commissioner, I am responsible for providing oversight of and policy direction for the  
6 human resources function for executive branch agencies of the State of Minnesota. I make this affidavit  
7 based on my personal knowledge.

8 2. President Trump’s decision to end the Deferred Action for Childhood Arrivals  
9 (“DACA”) program will negatively affect Minnesota’s executive branch agencies as employers. First,  
10 the decision negatively impacts agencies’ ability to respond to a serious workforce shortage. Second,  
11 the decision negatively impacts agencies’ diversity and inclusion efforts.

12 3. Minnesota has a shortage of skilled workers. Attached as Exhibit A is a copy of a  
13 publically available report from the Minnesota State Demographic Center, which is entitled  
14 “*Demographic Considerations for Long-Range & Strategic Planning for the State of Minnesota’s*  
15 *Executive and Legislative Leaders*. According to the Demographic Center, “In the coming decades,  
16 Minnesota’s population and its workforce will become increasingly older, and the labor force will slow  
17 its growth dramatically as a result.” By 2014, employees age 55 and older (the Baby Boomers)  
18 represented about 21.7% of the Minnesota workforce. Ex. A, pg. 7. In the coming years, Minnesota can  
19 expect a large fraction of those workers to retire.

20 4. But for Minnesota state government, the situation is even more dramatic. In 2016, 57%  
21 of Minnesota executive branch workers were age 45 or older, compared to only 44% of all Minnesota  
22 workers. *Id.* As stated by the Demographic Center, “due to longer longevity of service within the State  
23 of Minnesota executive branch, its employees are actually *even more likely to be older* than those in the  
24 statewide workforce across all sectors. . . . This sets the stage for a dramatic wave of retirements from  
25 State service in the coming two decades.” *Id.* The Demographic Center predicts that in one or two  
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1 decades, 4 in 10 Minnesota executive branch workers will retire. *Id.* Currently, the median age of the  
2 Minnesota executive branch workforce is 46. Forty-two percent of the executive branch workforce is 50  
3 years or older. With the median age of the workforce being 46 years, 28 percent of the workforce  
4 between 50 and 59 years old, and 14 percent of the all employees 60 years or older, the executive branch  
5 is poised to experience a retirement wave throughout the coming decade. In fact, in some state agencies,  
6 more than 25% of the employees are expected to retire within the next two years.  
7

8 5. Unfortunately, however, the Minnesota population of younger workers is not large  
9 enough to replace the outgoing Baby Boomers, which presents Minnesota with staffing pressures in a  
10 tightening labor force. All employers across Minnesota are and will be competing for an increasingly  
11 smaller labor pool, and Minnesota state government is and will continue to compete with private sector  
12 employers for talent.  
13

14 6. One of the Minnesota executive branch's key strategies to combat the labor force  
15 shortage is to engage traditionally underrepresented talent pools, including ethnic and racial  
16 minorities. According to publically available data from the American Community Survey, in 2015 over  
17 18 percent of Minnesota's labor force was reported to be from a racial/ethnic minority group.  
18

19 7. DACA's demise negatively impacts Minnesota state government's efforts to tap into  
20 underrepresented talent pools and will decrease the number of talented workers from diverse racial and  
21 ethnic backgrounds in Minnesota's labor pool. In addition, to the extent the executive branch employs  
22 DACA employees, the rescission of DACA will have a negative effect on our current workforce.  
23 Minnesota state government hires its employees based on their skills and qualifications and invests  
24 significant resources to train its employees. DACA workers will be forced to lose their employment,  
25 and the executive branch will lose its investment in those workers, and be forced to expend additional  
26 resources to fill those positions from an already tight labor pool.  
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# **Hudson**

# **Exhibit A**



# DEMOGRAPHIC CONSIDERATIONS FOR LONG-RANGE & STRATEGIC PLANNING

FOR THE STATE OF MINNESOTA'S EXECUTIVE AND LEGISLATIVE LEADERS

## PURPOSE

Minnesota State Statute 4A identifies the Commissioner of Administration (Admin) as the State planning officer, and requires that every five years the Commissioner develop an integrated long-range plan for the State that coordinates activities across government and stimulates public interest and participation in the future of the State. While the existence of these statutes continue to underscore the importance and value of considering implications of long range trends for policy-making and program management, Admin does not have the resources needed to fully implement the statutory intent. Funding for comprehensive planning was eliminated by 2008. In lieu of a comprehensive strategic planning document, this report fulfills the statutory requirement of M.S. 4A.01, subd. 2, by detailing three demographic trends that may impact State policies, programs, and decisions in the future. It is the second report following from this statute.

## INTRODUCTION

Demographic trends over the next several decades will exert unique pressure, transforming the landscape for Minnesota's State government. This report identifies three major demographic trends for State leaders to consider as they continue their work in strategic and long-range planning. Those three trends—population aging, shifts in the labor force, and growing racial and ethnic diversity—will change both the work and the workforce of the State of Minnesota. Additionally, the demographic trends discussed in this report will alter the absolute and relative size of population groups, requiring deliberation about whether and how the State should shift its policies, programs, and resources. However, while this report provides an overview of recent and anticipated demographic changes, along with discussion of some potential implications of each trend, this report does not contain an exhaustive list of possible impacts. Rather, by identifying prominent examples of State policy and programs that may be impacted by the trends, this report aims to stimulate further reflection and support for comprehensive, statewide strategic and long-range planning.

As will be discussed in detail, although the demographic shifts will settle in over the next several decades, the resulting compositional differences in our society and in our workforce will be long-lasting, not temporary. In particular, our society and workforce will be older for decades to come, and ever-more racially and ethnically diverse. Consequently, for Minnesota to maintain its position as a relatively high-performing state, it is crucial that we capitalize on current efforts by the Dayton Administration to embrace these demographic shifts as an opportunity to achieve excellence through a diverse and inclusive society and workforce, and a thriving economy that works for all Minnesotans.

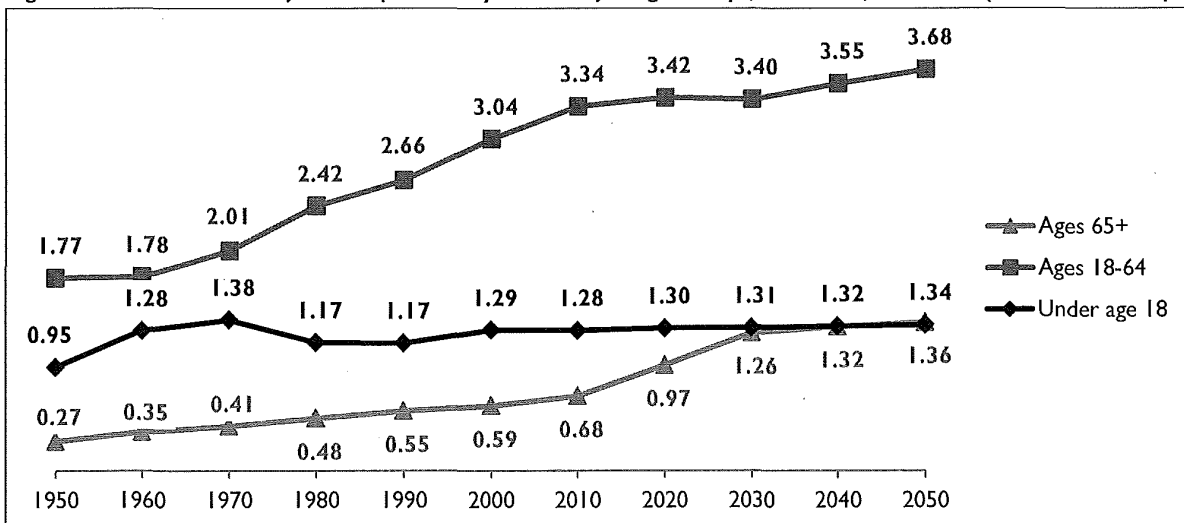
### I. POPULATION AGING

In the coming decades, Minnesota’s population and its workforce will become increasingly older, and the labor force will slow its growth dramatically as a result. Right now, Minnesota is on the cusp of an era in which its older adult population (ages 65+) will surge to a figure that is several orders of magnitude larger than what our state experienced just half a century ago. Furthermore, the outsized influence of the Baby Boomer generation<sup>1</sup> in Minnesota means that the *share or percentage* of those state residents that are 65 and older, as well as those 85 and older, will also attain new highs in the coming decades.

The coming growth in the older adult population is due to the large Baby Boomer generation entering the 65+ group, as well as lengthening life expectancies. The oldest Boomers turned age 65 in 2011. In 2009, Minnesota’s life expectancy at birth, 81.1 years, was second only to the state of Hawaii (by a mere 2.4 months) when compared to all states. Perhaps more importantly, life expectancy for those Minnesotans who had already survived to age 65 was 20.1 additional years (2007-2009 estimate, latest).<sup>2</sup>

While the size of Minnesota’s older adult population has been growing modestly since 1950 (see Figure 1), its growth is now accelerating rapidly as the Baby Boomers continue to push into this age group. From just 2010 to 2014, Minnesota’s 65+ population grew by more than 97,000 people. While the 2010 Census tallied about 683,000 older adults in our state, we anticipate the 65+ group will see 41% growth by 2020, resulting in about 965,000 older adults. By 2030, the 65+ population will surge to 1.26 million members. By that year, all the surviving Boomers will have entered the 65+ group, and growth will then moderate. However, while the transition of the Baby Boomers into their later years will be a one-time event, it will usher in a more sustained shift from a younger to an older age structure. Barring major unforeseen events, Minnesota’s older age structure will remain for the duration of this century.

Figure 1: Historical And Projected Population By Three Major Age Groups, Minnesota, 1950-2050 (In Millions of People)



Source: U.S. Census Bureau, decennial census, and Minnesota State Demographic Center Projections.

As illustrated in Figures 1 and 2, the older adult population will not grow in lockstep with other age groups. Rather, it will become increasingly larger relative to other age groups. Our projections show that Minnesota’s 65+ population will surpass

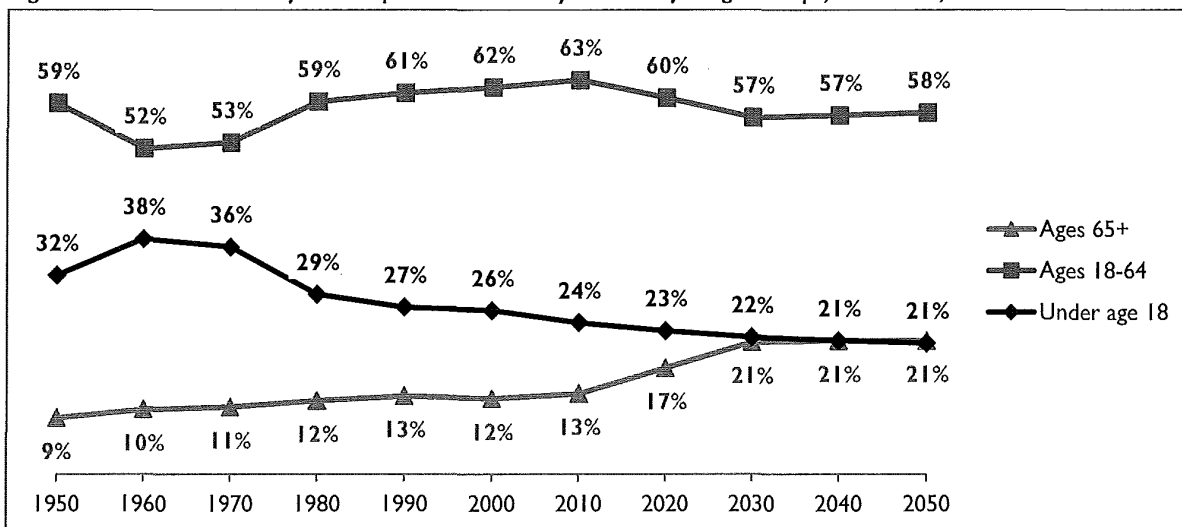
<sup>1</sup> Those born in 1946 through 1964.

<sup>2</sup> Centers for Disease Control and Prevention, National Center for Health Statistics. Online at [http://www.cdc.gov/mmwr/preview/mmwrhtml/mm6228a1.htm?\\_s\\_cid=mm6228a1\\_w](http://www.cdc.gov/mmwr/preview/mmwrhtml/mm6228a1.htm?_s_cid=mm6228a1_w)

the 5-17 (typical K-12 school-age) population by 2020, and that older adults will be more numerous than the entire child population under age 18 by 2035. This demographic shift among age groups is unprecedented in Minnesota. As recently as 1970, as the Boomers were coming of age, the child population was 3.4 times as large as the 65+ population.

From 1980 through 2010, the 65+ group in Minnesota consistently accounted for 12-13% of the total population. However, this share is expected to rise to 17% by 2020 and 21% by 2030. In other words, one in five Minnesotans will be an older adult by 2030. Both the child population and the 18-64 (“typical working-age”) population will decline as a proportion of Minnesota’s population over this time period (see Figure 2).

Figure 2: Historical And Projected Population Shares By Three Major Age Groups, Minnesota, 1950-2050



Source: U.S. Census Bureau, decennial census, and Minnesota State Demographic Center Projections.

A population that is considerably older on balance will have implications for demands on public programs and services, urban planning, housing stock, health care, economic purchasing programs, and a range of other areas relevant to State leaders. As Baby Boomers increasingly press into retirement, an immediate and direct implication will be the challenge among State managers to properly staff and train the workforce that will replace them. (Workforce changes are discussed more fully in the next section.)

An increasing number and share of users of State services and programs will be older adults. Public service providers will necessarily need to consider not only what services are provided, but how they are delivered. For example, customers and clients will expect State government to be attentive to font size on websites and print forms, to accessibility issues broadly, and other strategies to better serve their older adults. Soliciting feedback and program design suggestions from older adult users can help to identify areas in need of improvement or modification.

Historically, individuals earn less and consume less in retirement relative to their working years. Assuming this pattern continues, as the Baby Boomers transition out of the labor force, there will also be impacts on State revenues that are not insignificant.<sup>3</sup> State leaders should be aware that income taxes, sales receipts, and other State revenue streams will be

<sup>3</sup> One 2010 study estimated the impact of the aging of Minnesota’s population between 2007 and 2035. It found that Minnesota’s income tax collections in 2007 would have fallen by 7.5% if the age distribution had been what is projected in 2035. Some of these losses have already been realized as the front edge of the Boomers have begun entering retirement, but much of the impact in reduced income tax collections revenues is yet to be felt. Of note, the anticipated 7.5% reduction didn’t include losses resulting from a slowdown in future economic growth due to aging, which some economists consider a probable outcome. Further, the analysis assumed current tax laws continued into the future. These findings were presented in “The Aging Population and State Income Tax Revenue: 2007 and 2035,” by Beata Jajko, Hubert H. Humphrey School International Scholar, and Paul Wilson, Minnesota Department of Revenue, at the FTA Revenue Estimation & Tax Research Conference, 2010. Online at: [http://www.taxadmin.org/assets/docs/Meetings/10rev\\_est/wilson.pdf](http://www.taxadmin.org/assets/docs/Meetings/10rev_est/wilson.pdf)

affected by this demographic shift, so that they can contemplate necessary adjustments. As the population distribution influences the foundation for taxation, State leaders must be aware of coming revenue impacts.

Those public programs that serve older Minnesotans are certain to experience direct impacts of population aging. Perhaps most notably, older adults' enrollment in long-term care services under Medical Assistance ("MA," Minnesota's Medicaid program for those with low incomes and/or disabilities) will swell considerably as the Boomers enter the later years of their lives, during which many will require long-term care.

Long-term care is not medical care, but care that supports the personal activities of daily life such as bathing and dressing, and household needs. It is generally not covered by Medicare or typical health plans.<sup>4</sup> Approximately 70% of those 65 or older will need long-term care at some point in their lifetimes. According to the MN Department of Human Services, an estimated 12% of persons between age 65 and 84 have disabilities that require long-term care, and among those over 85, the need rises to 55%.<sup>5</sup> (The first Boomers will begin turning 85 in 2031.) While family and friends provide the majority of long-term care, when illness or disability is more than they can manage or an individual does not have a personal care network that is situated nearby, individuals look to community-based programs, home care agencies, assisted living facilities and nursing homes to provide long-term care services. Minnesotans become eligible for MA's long-term care services only if they have very limited income and assets, or after spending down most of their resources paying for health and long-term care.

Population aging is not just a short-term phenomenon to be weathered; rather, we are beginning a shift toward an older society that will be the reality well into Minnesota's future.

#### **Enrollment in Minnesota's MA Long-Term Care Services Will Increase**

In January 2015, enrollment in Minnesota's MA long-term care services, both care provided in nursing facilities and care provided in the home or community through the Elderly Waiver, totaled about 38,500 recipients. If, for the sake of discussion, one assumes the current rates of program utilization for MA long-term care services continue unchanged, and applies our office's population projections for older adults,<sup>6</sup> MA long-term care enrollment would grow to about 59,300 people by 2030, and 71,500 people by 2040. That translates to 85% growth in program enrollees over the 25-year period ending in 2040.<sup>7</sup>

#### **Growing MA Long-Term Care Enrollments Will Impact State Budget**

A comprehensive forecast of long-term care costs decades into the future is beyond the scope of this report and not possible to create with a reasonable level of precision. Again, for discussion purposes only, applying our demographic projections to a simple extrapolation of current program parameters helps illustrate the relevance of aging trends for budget and policy discussions. In State fiscal year 2015, MA long-term care services for enrollees age 65 or older in Minnesota totaled \$1.115 billion, including both State and federal funds.<sup>8</sup> (Medicaid is a joint state-federal program and MA costs are shared 50/50 with the federal government.)

<sup>4</sup> Unless received in a long-term care hospital setting, or in a skilled nursing facility, for a limited duration. More at: <https://www.medicare.gov/coverage/long-term-care.html>

<sup>5</sup> "Financing Options to Help Minnesotans Pay For Long-Term Care: Report and Recommendations," Prepared by the Own Your Future Advisory Panel, State of Minnesota, February 2014. Online at: <https://edocs.dhs.state.mn.us/lfsrver/Public/DHS-6911-ENG>

<sup>6</sup> Population projections for Minnesota through 2070 can be found at: <http://mn.gov/admin/demography/data-by-topic/population-data/our-projections/>

<sup>7</sup> Figures for this section were obtained from the MN Department of Human Services, Reports and Forecasts Division.

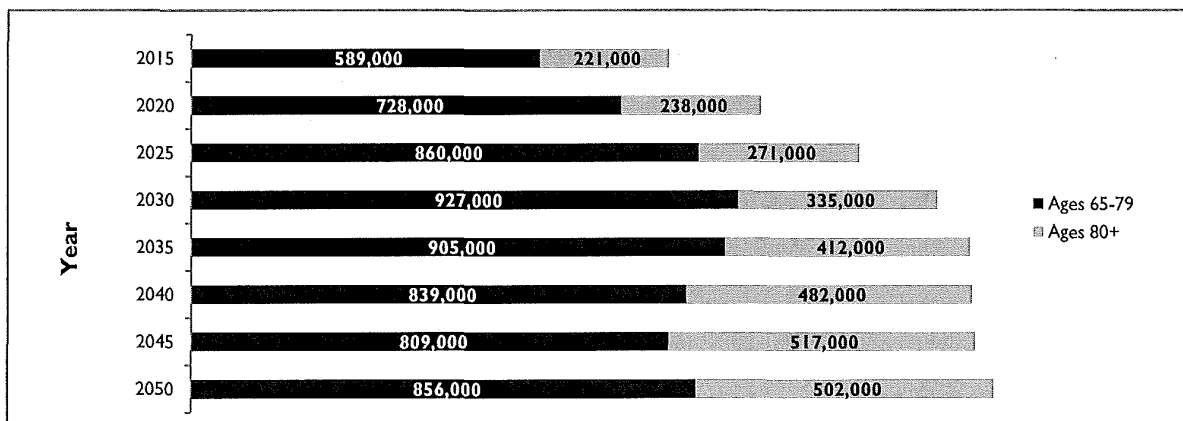
<sup>8</sup> This does not include the additional cost of basic medical care for MA enrollees age 65+, which totaled \$652 million in state fiscal year 2015.

If one again assumes the anticipated 85% growth in enrollment from the above extrapolation of current program patterns, and an average annual rate of inflation of 2.5% between 2015 and 2040, this results in a price tag of \$3.824 billion annually for long-term care costs under the Medical Assistance program by 2040. Using these assumptions, the amount of the State budget dedicated to long-term care services for older adults under Medicaid by 2040, then, would be 3.4 times the dollar amount spent upon it presently.<sup>9</sup> While alternate scenarios could be created with different inputs regarding inflation, enrollment, or changes to program eligibility, none will erase the conclusion that demographic trends will put steady pressure on this program’s enrollment and cost as Baby Boomers age.

Minnesota policy-makers are well-attuned to the significance that population aging will have for the State. In fact, Minnesota has led the nation in a shift away from long-term care for older adults in expensive, institutional settings—instead supporting care for older adults in their own homes when possible. Despite these promising trends, the State will need to anticipate how to further manage growth in demand for long-term care services, as current cost-mitigation efforts cannot fully offset the presumed cost impact of increased enrollments due to population aging. Importantly, failure to consider this anticipated program enrollment could result in diminished resources for all other discretionary areas of the State budget, crowding out the ability to make wise investments in education, infrastructure and other program needs.

Population aging is not just a short-term phenomenon to be weathered; rather, we are beginning a shift toward an older society that will be the reality for Minnesota well into the foreseeable future. Thus, the demographically driven budget pressures that will play out over the next 15 to 30 years will require a permanent budget response, one that realigns with Minnesota’s new age structure.

**Figure 3: Projected Older Adult Population, Minnesota, 2015-2050**



Source: Minnesota State Demographic Center Projections.

Minnesota’s Department of Human Services has created a long-term care planning initiative called “Own Your Future”<sup>10</sup> to raise awareness around the need for long-term care and spur planning efforts within families, particularly middle-income families who will not qualify for long-term care services under MA unless they have spent down many of their resources. The effort works to promote greater use of existing financing products as well as strategies to encourage new approaches to the financing of long-term care. The goal is dual: save families from impoverishment, while also easing the financial burden for government. Own Your Future and other efforts to help more families make advance planning decisions regarding their long-term care needs will be essential to managing State budget impacts for long-term care services.

<sup>9</sup> MA long-term care costs for disabled individuals under age 65 are also a significant and growing cost to the state (\$2.774 billion in state fiscal year 2015, with 50% of the costs paid by the federal government, and 50% by the State of Minnesota).

<sup>10</sup> Online at <http://mn.gov/dhs/ownyourfuture/index.jsp>

While Medical Assistance long-term care services will assuredly see growth, Minnesota's aging trends will also affect programs all across State government. By staying attuned to this population aging phenomenon, policy-makers and program managers will be well-to anticipate changes and make adjustments. Additional examples of anticipated changes:

- Programs that serve all ages, such as SNAP (formerly Food Support), should anticipate a rising share of its enrollees to be older adults as the population distribution shifts.
- Greater attention will need to be paid to the changing preferences and needs of individuals as they age in the broad spheres of housing and transportation options.
- Proper staffing of the medical and caregiving workforce will be a priority, as far more older adults will be managing chronic illnesses and/or disabilities that require caregiver assistance, including dementia.

While there are numerous areas that require careful thinking and planning for the impacts of an aging population, it also goes without saying that older adults are vital assets to their families and communities. As much as possible, older adults should be enlisted to shape the design of aging services at a statewide level, as well as in their communities. Furthermore, Minnesota's older adults exhibit very high levels of volunteerism, and State leaders should be aware of this enormous amount of human capital that may be enlisted to help meet an array of other State needs. Older adults may be willing to mentor younger workers, serve on task forces, or otherwise make positive impacts aligned with the State's goals.

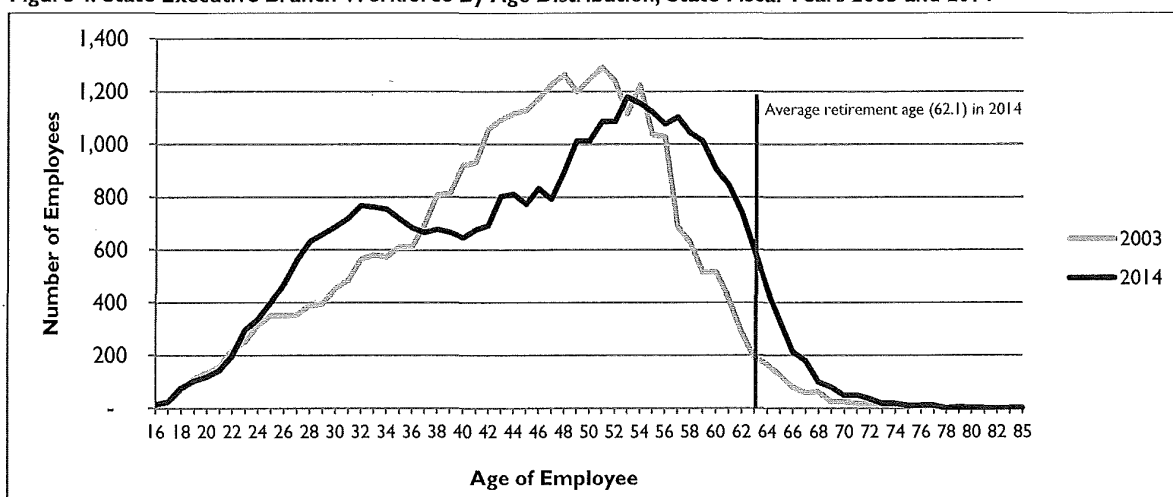


## II. WORKFORCE CHANGES

Demographic changes will also greatly influence Minnesota's workforce, with implications both for the State as an employer, and for the broader economy. This report focuses primarily on the State's workforce staffing, although these trends apply broadly to all Minnesota employers.

In 1995, employees age 55 and older represented 10.6% of all workers in Minnesota. By 2014, this percentage roughly doubled to 21.7%, as the bulge of the Baby Boomer generation served to shift the age distribution of the entire workforce.<sup>11</sup> As in the private and nonprofit sectors, the public workforce has been tilting older to contain a greater share of older workers in the last two decades. However, due to longer longevity of service within the State of Minnesota executive branch, its employees are actually *even more likely to be older* than those in the statewide workforce across all sectors.

**Figure 4: State Executive Branch Workforce By Age Distribution, State Fiscal Years 2003 and 2014**



Source: "State of Minnesota Workforce Report 2014," Minnesota Management and Budget.

In State fiscal year 2014, among the Executive Branch,<sup>12</sup> about 29% of all workers were age 55 or older, representing just above 10,000 employees (see Figure 4). And nearly 6 in 10 workers (57%) were age 45 or older, compared to only 44% of workers for all employers statewide.<sup>13</sup> This sets the stage for a dramatic wave of retirements from State service in the coming two decades. In State fiscal year 2014, the average age of retirement was 62.1, the highest on record and an increase of 2.6 years since 2002. Nonetheless, with retirement likely to occur within one or two decades for more than 4 in 10 State workers, workforce succession planning needs to be a constant concern and activity across all departments. Leaders must be intentional about knowledge transfer, recording details about key processes and relationships, and cross-training employees so that essential institutional knowledge does not retire with exiting employees. While transition planning has always been necessary, the volume of retirements from State service will happen in much quicker succession, requiring much more attention than prior efforts.

<sup>11</sup> Minnesota Department of Employment and Economic Development, Quarterly Workforce Indicators, available at: <http://mn.gov/deed/newscenter/publications/review/november-2015/seismic-shift.jsp>

<sup>12</sup> The Executive Branch includes all state agencies with the exception of the Minnesota State Colleges and Universities (MnSCU) system and retirement agencies. By definition, the Executive Branch excludes the Judicial and Legislative Branches of state government.

<sup>13</sup> "State of Minnesota Workforce Report 2014," available online at: <http://mn.gov/mmb/images/mn-state-workforce-report-2014-pdf-na.pdf>

Simultaneously, managers and supervisors must be planning for broad scale talent acquisition and retention efforts in the wake of the Boomers' retirements. Figure 4 reveals that the State's Executive Branch employee age distribution contains two peaks—among workers in their 50s and in their early 30s. Representation of “mid-career” workers in their late-30s and 40s is far less common. To the extent that employees from this age group are more likely to assume leadership positions vacated by retirees, the State will need to be very intentional about retaining its current mid-career public workers and deploy innovative recruitment efforts to attract others.

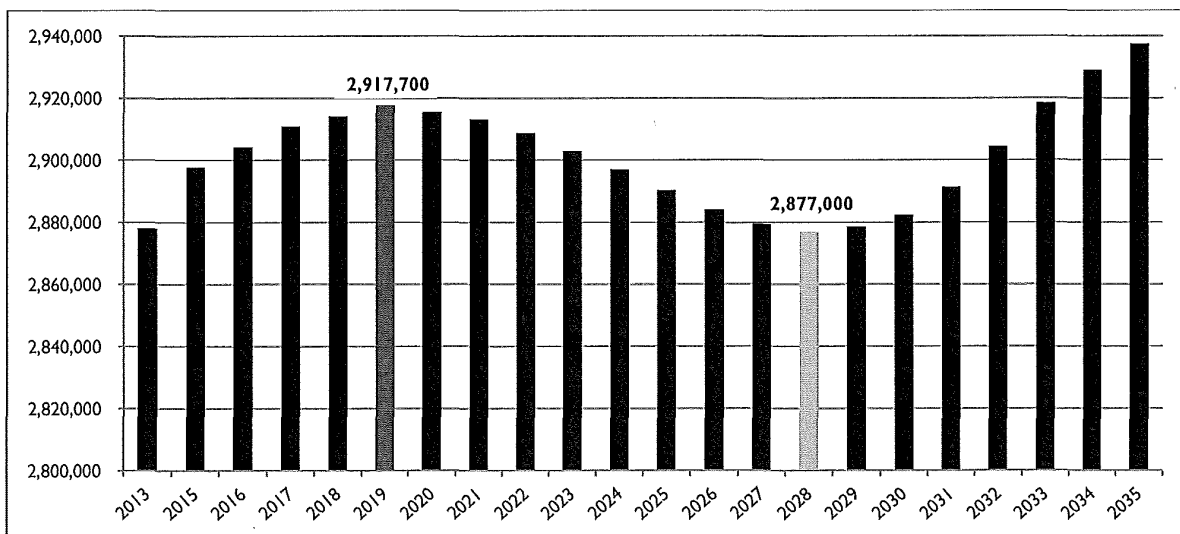
While Minnesota can be assured of greater numbers of older adults in the decades to follow, it may surprise some to learn that the age 18-64 group is *not* going to continue growing in the coming decade (See Figure 1). This cohort is anticipated to peak in size at about 3,419,000 members in just a few years, in 2019. Thereafter, it will experience a net decline that will bottom out at nearly 20,000 individuals fewer by 2029. If we narrow the demographic lens even further, by removing the years when many Minnesotans are out of the labor force pursuing post-secondary degrees (ages 18-24), an even more concerning workforce landscape emerges. Between the years of 2019 and 2028, the population ages 25-64 will experience a net loss of about 40,800 people. This is due to the fact that, as the Boomers transition out of this age group, the relatively smaller Generation X does not contain as many people to fully backfill those age groups (See Figure 5). Thus, the 10 years following 2019 will likely be the most severe in terms of labor supply in Minnesota, barring major changes in migration.<sup>14</sup>

57%

of State workers are age 45 or older— compared to only 44% of all workers in Minnesota.

This sets the stage for a dramatic wave of retirements from State service in the coming two decades.

Figure 5: Population Ages 25-64, Minnesota, 2013-2035 (Projected)



Source: Minnesota State Demographic Center Projections.

<sup>14</sup> For an examination of recent migration trends affecting Minnesota's workforce, see "Minnesota on the Move: Migration Patterns & Implications" at <http://mn.gov/admin/images/mn-on-the-move-migration-report-msdc-jan2015.pdf>

The tightening labor force will strengthen the hand of workers relative to employers across Minnesota's entire economy, and heighten the demand for talented employees. Consequently, employers everywhere will need to work harder to attract and retain essential employees on their payroll—through a combination of compensation, traditional and new benefits, and employee engagement strategies. Private sector employers may have more agility in their ability to offer new benefits, so the State must be thoughtful about how it can compete for workers in a much tighter talent marketplace. The State of Minnesota will benefit by marketing and effectively branding those features that distinguish it in the eyes of potential employees—namely, meaningful work in the service of the public, diverse and inclusive work environments, high levels of union representation, excellent health benefits, access to a pension plan, and potential federal forgiveness of student loans. Attention to creating a positive work environment should be at the forefront of supervisors' and managers' minds.

A key strategy for the State is to engage Minnesota's rich diversity by proactively recruiting members of communities traditionally underrepresented in the public workforce. Governor Dayton is leading on this issue through two initiatives to diversify the public workforce. In his 2016 State of the State speech,<sup>15</sup> Governor Dayton announced his goal that State agencies will increase recruitment in order that 20 percent of State employees will be persons of Color by 2019. Additionally, Governor Dayton issued Executive Order 14-14<sup>16</sup> requiring State agencies to increase employment for people with disabilities to at least 7 percent by 2018.

In the aggregate, older workers have tremendous experience, institutional knowledge, and seasoned leadership. However, older workers also have a higher prevalence of health challenges and disabilities. As such, in addition to on-going State efforts to attract and retain more persons with disabilities to the State workforce, meeting future workforce needs may require additional accommodations for State workers in the years leading up to their retirement. Furthermore, as our State's overall population tilts older, employees will be increasingly likely to have direct or indirect caregiving duties for their parents or spouses. This will require more flexibility in the workplace so that employees can juggle personal responsibilities while still performing their essential job functions.

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<sup>15</sup> Available online at: <http://www.leg.state.mn.us/lrl/mngov/stateofstate>

<sup>16</sup> Available online at: [http://mn.gov/governor/assets/EO-14-14-tagged.pdf\\_tcm1055-91904.pdf](http://mn.gov/governor/assets/EO-14-14-tagged.pdf_tcm1055-91904.pdf)

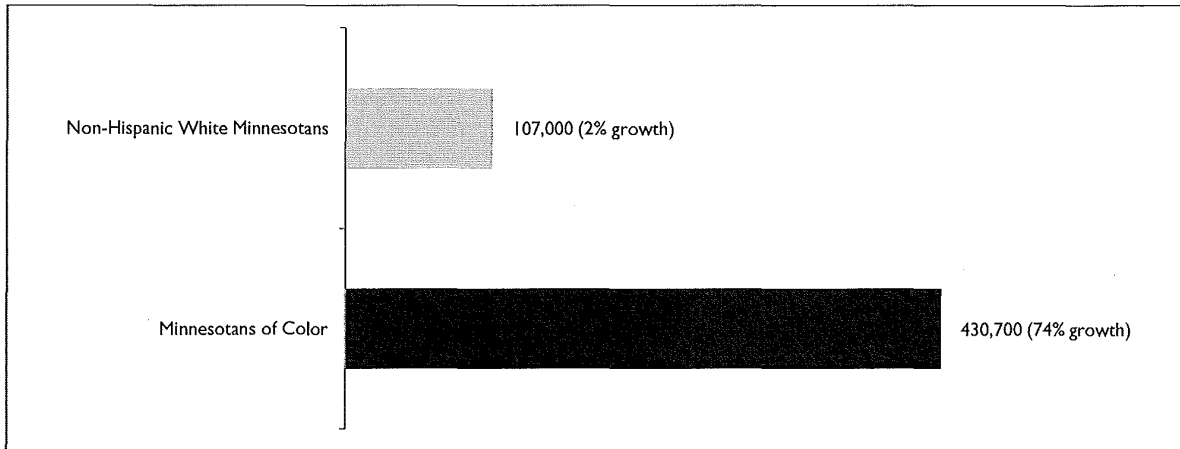
### III. GROWING RACIAL AND ETHNIC DIVERSITY

While Minnesota’s total population is more than 80% non-Hispanic White, the racial and ethnic make-up of our population is changing rapidly. Between 2000 and 2014, the non-Hispanic White population grew by only 2% (adding about 107,000 people on net). By comparison, all other populations of Color, including American Indians, grew by 74%, adding about 430,700 people (see Figure 5). Several simultaneous trends are rapidly diversifying our State’s population. First, a growing share of babies born each year in Minnesota are either Hispanic and/or a race other than White — including 28% of births in 2014<sup>17</sup>. Second, Minnesota’s population gains through migration are disproportionately due to persons of Color. Third, mortality rates primarily affect our non-Hispanic White Minnesotans (because they are older on balance and represent a far larger share of older adults. Our projections indicate that Asian, Black, and Hispanic and multiracial Minnesotans will continue to grow most rapidly in the coming decades.

Furthermore, it is well documented that many populations of Color experience poorer outcomes in education, health, and economic status, relative to non-Hispanic White Minnesotans.<sup>18</sup> If we do not improve these outcomes for our fastest growing population groups, Minnesota’s overall population health and well-being will decline. Weaker primary and secondary educational preparation among some groups threatens the strength and vitality of our future labor force, while elevated poverty rates and low incomes among growing groups threatens to swell enrollment in means-tested programs, and the State’s cost from those programs. These disproportionate outcomes are an affront to the State’s broad mission of securing the health and well-being of all of its residents.

In the Twin Cities  
7-county metro area,  
more than  
**1/3<sup>rd</sup>**  
of those in the prime  
working years of age  
20-64 will be People of  
Color by 2020.

**Figure 6: Change In Population Size Among Non-Hispanic Whites And Populations Of Color In Minnesota, 2000-2014**



Source: U.S Census Bureau, 2000 Census and 2014 Population Estimates. Note: Numbers have been rounded for ease of interpretation.

<sup>17</sup> MN Center for Health Statistics, “2014 Minnesota Health Statistics Annual Summary,” online at: <http://www.health.state.mn.us/divs/chs/annsum/14annsum/index.html>

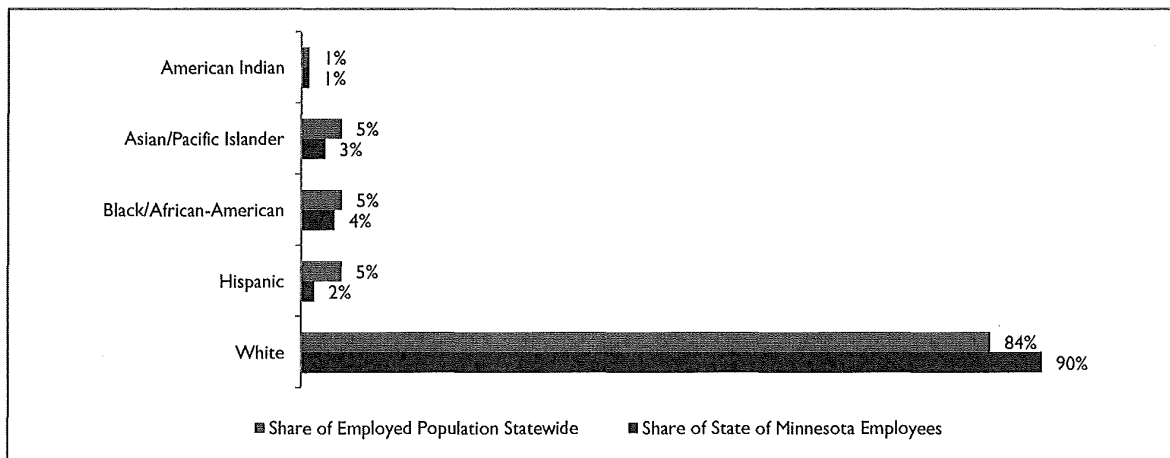
<sup>18</sup> For a fuller presentation of various economic and educational disparities, see our January 2016 report, “The Economic Status of Minnesotans: A Chartbook With Data For 17 Cultural Groups” at <http://mn.gov/admin/images/the-economic-status-of-minnesotans-chartbook-msdc-jan2016-post.pdf>

The State is already engaged in an array of equity-advancing activities, including the 2015 creation of the Governor’s Diversity and Inclusion Council<sup>19</sup>, the Office of Equity in Procurement<sup>20</sup> in the Department of Administration, and Office of Career and Business Opportunity<sup>21</sup> at the Department of Employment and Economic Development. This report does not seek to summarize the work of these and other important efforts. But considering that Minnesota’s population will only grow more diverse in terms of race, ethnicity, culture, and language in the decades to come, this report seeks to emphasize the necessity of continued training in cultural competency and equity work among the State workforce, both as it serves the public and relates to its own members. In addition, the State must continue to build a workforce that mirrors the current and coming demographics of the state as a whole. Presently, among the State’s Executive Branch workforce, White employees are somewhat over-represented relative to their share in the employed population statewide, while employees of Color are somewhat under-represented (see Figure 7).

The potential workforce is changing quickly. In 2010, People of Color represented only 15% of those Minnesotans in their primary working years of ages 20-64, but we anticipate that share will grow by 8 percentage points, to 23%, by 2020. In the 7-county<sup>22</sup> Twin Cities metro area, which is more diverse than Greater Minnesota, 21% of persons in that age range identified as persons of Color in 2010. By 2020, that percent is anticipated to rise 12 percentage points, to 33% of those in these prime working years.<sup>23</sup>

To demonstrate that it is a model employer, the State should continue its current efforts to examine its hiring practices, advancement and leadership opportunities, procurement, grant-making, awarding of contracts, service provision, and other practices across the enterprise to achieve equitable representation and treatment for persons across all racial groups and backgrounds.

**Figure 7: Distribution By Race and Ethnicity, State Of Minnesota Executive Branch Employees And Employees Statewide, 2014**



Source: “State of Minnesota Workforce Report 2014” and IPUMS version of the 2014 American Community Survey.  
 Note: All race groups are non-Hispanic. Executive Branch employees with unknown race or ethnicity were excluded from these calculations.

<sup>19</sup> Learn more at: <https://mn.gov/governor/newsroom/pressreleasedetail.jsp?id=102-166971>

<sup>20</sup> Online at: <http://mn.gov/admin/business/vendor-info/oep/about/index.jsp>

<sup>21</sup> Learn more at: <http://mn.gov/deed/newscenter/press-releases/newsdetail.jsp?id=466-175790>

<sup>22</sup> Representing the counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott and Washington.

<sup>23</sup> Data for 2015-2020 were derived by the MN State Demographic Center by extrapolating observed growth between 2010 and 2014.

## CONCLUSION

Population aging, workforce changes, and growing diversity are three major demographic trends that will shape and transform Minnesota in the coming decades. These trends are fundamentally related to efforts to plan for sustainable, responsible budgets and future State government and private sector workforce needs, and they underscore the importance of eliminating economic and other disparities across racial and ethnic lines to best position all Minnesotans for success. Policymakers and state leaders will need to consider these fundamental demographic changes as they conduct strategic and long-term planning in Minnesota. This brief has pointed to possible budgetary impacts, shifts in public program users, workforce staffing concerns, and racial equity considerations. This report does not contain an exhaustive list of potential impacts from these trends, but it cites examples that reflect how these trends could have meaningful impacts. Furthermore, the report cannot fully conceive of how future federal policies, technology, productivity gains, health advances, and other developments may change the trajectory of demographic trends and programs. However, the report serves as a prompt for further reflection and continued vigilance as to how these trends will affect Minnesota's State government, the State budget, and the health and welfare of the general population. Supervisors and managers across the enterprise of State government should be aware of these trends, and reflect upon how this information may require changes in their respective areas of work, as they proceed with their long-range and strategic planning. ☞

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*This report was prepared by the Minnesota State Demographic Center at the Department of Administration, with input from the Department of Human Services, Minnesota Management and Budget, and the Department of Revenue.*

## RESOURCES TO ASSIST WITH PLANNING

From the Minnesota State Demographic Center:

- [Population estimates for Minnesota, 87 counties, and all cities and townships](#) (web page)
- [Population projections for Minnesota, 13 Economic Development Regions, and 87 counties](#) (web page)
- [The Economic Status of Minnesotans: A Chartbook With Data for 17 Cultural Groups](#) (January 2016 report)
- [Minnesota On The Move: Migration Patterns & Implications](#) (January 2015 report)
- [In the Shadow of the Boomers: Minnesota's Labor Force Outlook](#) (December 2013 report)
- [The Long Run Has Become The Short Run: Budget Implications of Demographic Change](#) (February 2011 report)
- [Toward a Vision for Minnesota: Long-Range Strategic Planning Overview Recommendations](#) (October 2010 report)

Other resources:

- [State of Minnesota Workforce Report 2014](#), Enterprise Human Resources, Minnesota Management and Budget (2015 report)
- [Minnesota State Dashboard](#), Minnesota Management and Budget (website)
- [Economic Analysis](#), Minnesota Management and Budget (web page)
- [Budget and Economic Forecast](#), Minnesota Management and Budget (web page)
- [Minnesota State Budget Trends Study Commission Report](#) (January 2009 report)

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

19 THE REGENTS OF THE UNIVERSITY OF  
20 CALIFORNIA and JANET NAPOLITANO,  
21 in her official capacity as President of the  
22 University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND  
26 SECURITY and ELAINE DUKE, in her  
official capacity as Acting Secretary of the  
Department of Homeland Security,

27 Defendants.  
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CASE NO. 17-CV-05211-WHA

**DECLARATION OF JESSICA M. JENKINS**



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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,  
  
Plaintiffs,  
  
v.  
  
U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,  
  
Plaintiffs,  
  
v.  
  
UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,  
  
Defendants.

CASE NO. 17-CV-05380-WHA

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COUNTY OF SANTA CLARA and  
SERVICE EMPLOYEES INTERNATIONAL  
UNION LOCAL 521,  
  
Plaintiffs,  
  
v.  
  
DONALD J. TRUMP, in his official capacity  
as President of the United States, JEFFERSON  
BEAUREGARD SESSIONS, in his official  
capacity as Attorney General of the United  
States; ELAINE DUKE, in her official  
capacity as Acting Secretary of the Department  
of Homeland Security; and U.S.  
DEPARTMENT OF HOMELAND  
SECURITY,  
  
Defendants.

CASE NO. 17-CV-05813-WHA

1 I, Jessica M. Jenkins, declare:

2 1. I am the supervising immigration attorney at Center for Employment Training  
3 Immigration and Citizenship Program (CET-ICP), a DOJ accredited immigration legal services program  
4 in San Jose, California.

5 2. Since August 15, 2012, CET-ICP has helped over 500 clients apply for and renew their  
6 grants of Deferred Action for Childhood Arrivals (DACA).

7 3. CET-ICP staff have diverted time and energy from other important projects in response  
8 to the September 5, 2017 announcement of the termination of the DACA program. In the days  
9 immediately following the announcement, we contacted as many of our DACA clients as possible to  
10 explain the ramifications of the announcement to them. We scrambled to schedule additional clinics in  
11 collaboration with partners in the community, so that we could be available to file DACA renewal  
12 applications for as many eligible applicants as possible. We expanded our weekly free clinic hours to  
13 all-day Thursdays, rescheduling other clients' appointments in order to do so, and also closed the office  
14 on Monday September 25 in order to host a renewal clinic off-site at San Jose State University. We  
15 conducted multiple media interviews with television, radio and newspaper reporters in order to  
16 disseminate accurate information about DACA's termination and to encourage people to access our  
17 services. All of these efforts have cost our staff time and resources that would have otherwise been  
18 spent on other projects, and many of our staff have worked extra hours in response.

19 4. In addition to the extra time and resources, responding to the termination of DACA has  
20 taken a psychological and emotional toll. Each of our DACA client needs a thorough, individual  
21 consultation so we can explain the consequences of the DACA program's termination, provide know-  
22 your-rights and emergency planning information, and explore other possible avenues of immigration  
23 relief. Our clients and their families, many of whom we have known for years, are upset, anxious, and  
24 fearful. It has been challenging for all of our staff to have multiple consultations a day with tearful  
25 clients. We arranged to have mental health professionals come in to help our staff cope with the  
26 secondary trauma of providing services to a community in crisis.

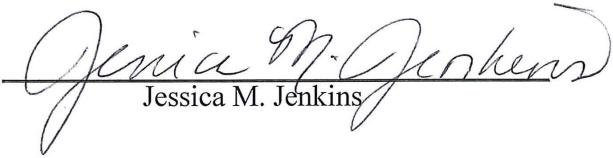
27 5. We are concerned that many people eligible to renew did not do so before October 5 for  
28 various reasons, including fear of submitting updated contact information to the Department of

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Homeland Security, lack of time or resources, confusion about who is eligible to renew and lack of sufficient notice about the abruptly announced October 5 deadline.

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

Executed on October 30, 2017, at San Jose, California.

  
Jessica M. Jenkins