



July 28, 2025

Via Public Access Link Portal & Certified Mail

U.S. Department of Justice
Executive Office for Immigration Review
Office of General Counsel – FOIA Service Center
5107 Leesburg Pike, Suite 1903
Falls Church, VA 22041

Director of Public Affairs
Office of Public Affairs
Department of Justice,
950 Pennsylvania Avenue NW.
Washington, DC 20530-0001

Re: Freedom of Information Act Request on Terminations of Immigration Proceedings and ICE Arrests at Immigration Courts

Dear FOIA Officer:

The American Immigration Council (the “Council”) and LatinoJustice PRLDEF (collectively, “Requesters”) submit this request to the Executive Office for Immigration Review (“EOIR”) under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552.

Since around the middle of May 2025, U.S. Immigration Customs and Enforcement (“ICE”) has been arresting noncitizens in or near EOIR immigration courts after they appear for a hearing in their immigration case. Requesters seek certain records about these arrests as well as expedited processing and a fee waiver.

I. REQUEST FOR INFORMATION

Requesters seek all guidance, instructions, policies, and other similar records¹ created by, provided to, or otherwise in the possession of EOIR for ICE enforcement operations or arrests at or near an immigration court issued since January 20, 2025.

¹ These records include but are not limited to guidance, instructions, policies, and other similar records that take the form of an email sent by EOIR.ocij.all.of.acijs@doj365.onmicrosoft.com. See Mark Rivera et al., *ICE Arrests at Immigration Court in Chicago, Nationwide Labeled ‘Unlawful’ in New Lawsuit*, ABC 7 Chicago (July 18, 2025, 8:36 PM), <https://abc7chicago.com/post/us-immigration-news-ice-arrests-courts-chicago-nationwide-labeled-unlawful-new->

II. FORMAT OF PRODUCTION

Requesters seek responsive electronic records in a machine-readable, native file format, with all metadata and load files. Requesters ask EOIR to produce responsive materials in their entirety, including all attachments, appendices, enclosures, and/or exhibits, in a text-searchable, static-image format (PDF), in the best image quality in the agency's possession, and that the records be provided in separate, Bates-stamped files.

III. EXPEDITED PROCESSING

Requesters seek expedited processing of this request and certify that the statements herein are "true and correct" pursuant to 28 C.F.R. § 16.5(e)(3). FOIA obligates EOIR to process requests expeditiously in two cases: (i) those where a requester "demonstrates a compelling need"—such as "urgency to inform the public concerning actual or alleged Federal Government activity" if the requester is "primarily engaged in disseminating information," 5 U.S.C. § 552(a)(6)(E)(i), (v)—and (ii) "in other cases determined by the agency," *id.* § 552(a)(6)(E)(i), which, for the Department of Justice, include "[a] matter of widespread and exceptional media interest in which there exist possible questions about the government's integrity which affect public confidence," 28 C.F.R. § 16.5(e)(1)(ii), (iv). Both cases exist here.

A. A MATTER OF WIDESPREAD AND EXCEPTIONAL INTEREST RAISING GOVERNMENT INTEGRITY CONCERNS

EOIR's role in ICE arrests at and near immigration courts is a matter of widespread and exceptional media interest in which there exist possible questions about the government's integrity which affect public confidence.

Fifty articles on an issue make it a matter of widespread and exceptional public interest. *Citizens for Resp. & Ethics in Wash. v. U.S. DOGE Serv.*, Case No. 25-cv-511 (CRC), 2025 WL 752367, at *13 (D.D.C. Mar. 10, 2025) (hereinafter "CREW") *see also Brennan Ctr. for Just. v. Dep't of Com.* 498 F. Supp. 3d 87, 97 (D.D.C. 2020). A "handful of articles" also establishes such interest where the articles are "in a variety of publications" and "repeatedly reference the ongoing national discussion." *Am. Civ. Liberties Union v. Dep't of Just.*, 321 F. Supp. 2d 24, 32 (D.D.C. 2004).

Here, one hundred and twenty one articles in nationwide, state, local, and international media outlets have covered ongoing ICE arrests at or near immigration courts in Atlanta, Boston, Buffalo, Charlotte, Denver, Houston, Los Angeles, Miami, New York, Portland, Phoenix,

[lawsuit-trump-administration/17186490/](https://www.lawsuit-trump-administration/17186490/) (referencing email notifying immigration judgments of ICE enforcement operations in immigration courts).

Sacramento, San Diego, San Francisco, Seattle, and elsewhere throughout the country since May 20, 2025.² This equates to almost two articles per day for sixty-nine days.

² Margaret Kadifa, *ICE Arrests All Adults Without Children at S.F. Immigration Court Today*, Mission Local (July 25, 2025, 1:05 PM), <https://missionlocal.org/2025/07/hed-ice-steps-up-arrests-at-s-f-immigration-court/> (hereinafter, “Kadifa re: Adult Arrests”); Pedro Camacho, *ICE Arrests Migrant Deemed Mentally Impaired by Judge as He Exits Immigration Court: ‘He’s Clearly Not Understanding the Questions’*, The Latin Times (July 25, 2025, 10:36 AM), <https://www.latintimes.com/ice-arrests-migrant-deemed-mentally-impaired-judge-he-exits-immigration-court-hes-clearly-not-587576>; Jordan Salama, *When ICE Agents Are Waiting Outside the Courtroom*, The New Yorker (July 25, 2025), <https://www.newyorker.com/news/the-lede/when-ice-agents-are-waiting-outside-the-courtroom>; Eileen Markey, *Punished for Playing by the Rules: The Deliberate Cruelty of Trump’s Deportation Regime*, The Nation (July 24, 2025), <https://www.thenation.com/article/society/ice-trump-detention-regime-cruelty/>; Dean Moses, *ICE in Court: Feds Snatch More Immigrants as Lander, Williams Demand Safety Inspection of Detainment Center*, AMNY (July 23, 2025), <https://www.amny.com/politics/ice-immigrants-court-lander-williams-07232025/> (hereinafter, “Mose re: ICE in Court”); Danielle James, *ICE Arrests at Check-Ins, Court Hearings Are on the Rise. Michigan Is No Exception*, MLIVE (July 21, 2025, 7:10 AM), <https://www.mlive.com/politics/2025/07/ice-arrests-at-check-ins-court-hearings-are-on-the-rise-michigan-is-no-exception.html>; Margaret Kadifa, *ICE Agents Keep Snatching Asylum Seekers Immediately After Their Court Hearings*, Mother Jones (July 21, 2025), <https://www.motherjones.com/politics/2025/07/ice-agents-arrest-asylum-seekers-after-court-hearings-san-francisco/>; Esmeralda Perez, *San Diego Immigration Attorney Weighs in on Lawsuit Challenging ICE Courthouse Arrests*, CBS8 (July 20, 2025, 10:19 PM), <https://www.cbs8.com/article/news/local/san-diego-attorney-weighs-in-on-lawsuit-challenging-ice-courthouse-arrests/509-79fec519-eb00-442c-b479-4522f423be7c>; Martha Bellisile et al., *Volunteers Flock to Immigration Courts to Support Migrants Arrested in the Hallways*, ABC News (July 20, 2025, 8:38 AM), <https://abcnews.go.com/US/wireStory/volunteers-flock-immigration-courts-support-migrants-arrested-hallways-123902561> (hereinafter “Bellisile et al. re: Volunteers Flock to Immigration Courts”); Eduardo Cuevas, *‘Escalation:’ Federal Agents Now Detaining People with Active Immigration Cases*, USA Today (July 18, 2025, 11:26 AM), <https://www.usatoday.com/story/news/nation/2025/07/18/migrants-immigration-court-trump-crackdown/84614161007/>; Rivera et al., *supra* n. 1; Jeff Abbot, *Texas Based Immigration Advocacy Group Sues Trump Administration Over Courthouse Arrests*, El Paso Times (July 18, 2025, 5:02 AM), <https://www.elpasotimes.com/story/news/immigration/2025/07/18/texas-immigration-advocacy-group-challenges-ices-courthouse-arrests/85255298007/>; Emily Belz, *In Immigration Court, Christians Show Up to Fill the Back Benches*, Christianity Today (July 18, 2025), <https://www.christianitytoday.com/2025/07/immigration-court-observation-ice-arrests/>; David Baratz, *See How ICE Targets Immigrants Appearing at Routine Court Hearings*, USA Today (July 17, 2025, 3:15 PM), <https://www.usatoday.com/picture-gallery/news/nation/2025/07/17/how-ice-targets-immigrants-at-court-hearings-photos/85259555007/>; Martha Bellisile, *Homeland Security Officials Defend Immigration Court Arrests After Being Sued*, Associated Press (July 17, 2025, 2:04 PM), <https://apnews.com/article/ice-immigration-court-immigrants-a5190ada4a6019f84d76e62c11c44e30>; Swasti Singhai, *Five Days, 12 Arrests: A Week Inside San Diego Immigration Court*, Times of San Diego (July 17, 2025, 7:41 AM), <https://timesofsandiego.com/politics/2025/07/17/arrests-immigration-court-trump-anxiety-chaos/> (hereinafter, “Singhai re: Week at San Diego Immigration Court”); Devan Cole et al., *Trump Administration Sued Over ICE Arrests at Immigration Courthouses*, CNN (July 16, 2025, 6:23 PM), <https://www.cnn.com/2025/07/16/politics/ice-immigration-courthouse-arrests-lawsuit/>; Luis Ferré-Sadurní, *Immigrants File Class-Action Lawsuit to Stop ICE Courthouse Arrests*, NY Times (July 16, 2025), <https://www.nytimes.com/2025/07/16/nyregion/trump-ice-arrests-lawsuit-immigrants.html> (hereinafter, “Ferré-Sadurní re: Lawsuit”); Maxine Bernstein, *Federal Judge in Oregon: Homeland Security ‘Tricked’ Asylum Seeker Before Arrest at Immigration Court*, The Oregonian (July 15, 2025, 10:47 AM), <https://www.oregonlive.com/pacific-northwest-news/2025/07/federal-judge-in-oregon-homeland-security-tricked-asylum-seeker-before-arrest-at-immigration-court.html>; Sarah Thamer, *Advocates Denounce ICE Arrests at Fort Snelling Immigration Court*, MPR News (July 15, 2025, 4:00 AM), <https://www.mprnews.org/story/2025/07/15/advocates-protest-ice-arrests-at-immigration-court>; Alex Baumhardt,

Asylum Seeker Taken by ICE Outside Portland Immigration Court to Be Immediately Released, Oregon Capital Chronicle (July 14, 2025, 5:24 PM), <https://oregoncapitalchronicle.com/2025/07/14/asylum-seeker-taken-by-ice-outside-portland-immigration-court-to-be-immediately-released/>; Ciara Encinas, *Volunteers Describe How They Document ICE Arrests in Immigration Courts*, Fox 5 (July 11, 2025, 4:55 PM), <https://fox5sandiego.com/news/local-news/san-diego/san-diego-court-ice-arrests/>; Gerardo Zavala, *ICE Arrests Asylum Seeker After Sacramento Court Hearing*, CAPRADIO (July 11, 2025), <https://www.capradio.org/articles/2025/07/11/ice-arrests-asylum-seeker-after-sacramento-court-hearing/>; Paige Browning & John O'Brien, *Fears of Arrests Cause Tension at Seattle Immigration Court*, KUOW (July 10, 2025, 5:58 PM), <https://www.kuow.org/stories/fears-of-ice-arrests-cause-tension-at-seattle-immigration-court/>; Margaret Kadifa, *ICE Arrests 4 People After Immigration Court Hearings in San Francisco*, Mission Local (July 10, 2025, 12:08 PM), <https://missionlocal.org/2025/07/ice-arrests-four-people-after-they-appear-in-immigration-court/> (hereinafter, "Kadifa re: 4 Arrests"); *What Goes On in America's Immigration Courts*, Economist (July 10, 2025), <https://www.economist.com/united-states/2025/07/10/what-goes-on-in-americas-immigration-courts> (hereinafter "Economist"); Francesca Regalado & Soumya Karlamangla, *Tensions Escalate in San Francisco over Immigration Enforcement*, NY Times (July 9, 2025), <https://www.nytimes.com/2025/07/09/us/ice-immigration-protest-san-francisco.html>; John Ramos, *Peruvian Women Detained by ICE in San Francisco Freed After Judge's Ruling*, CBS News (July 8, 2025, 6:35 PM), <https://www.cbsnews.com/sanfrancisco/news/san-francisco-ice-woman-freed-immigration-court/>; Tom Li & Ko Lyn Cheang, *Video: Protestors Cling to Departing ICE Van After Arrest at S.F. Immigration Court*, San Francisco Chronicle (July 8, 2025, 5:34 PM), <https://www.sfchronicle.com/sf/article/protesters-cling-ice-van-chaos-immigration-court-20761721.php>; Henry Rosoff, *ICE Escalates Immigration Court Arrests Outside NYC Court*, PIX11 (July 8, 2025, 5:18 PM), <https://pix11.com/news/local-news/manhattan/ice-escalates-immigration-arrests-outside-nyc-court/>; Sabrina Tavernise, *Against Illegal Immigration, but Married to Someone Here Illegally*, NY Times (July 8, 2025), <https://www.nytimes.com/2025/07/08/us/trump-illegal-immigration-raids-arkansas.html>; Nisa Khan, *When ICE Is Waiting at Immigration Court, What Can Advocates Do?*, KQED (July 7, 2025), <https://www.kqed.org/news/12047018/how-legal-experts-advocates-are-responding-to-the-detention-of-asylum-seekers>; Emma Seiwell, *ICE Opposition Grows, With Lawmakers, Attorneys Decrying Courthouse Arrests as a Violation of Due Process*, NY Daily News (July 5, 2025, 6:00 AM), <https://www.nydailynews.com/2025/07/05/ice-opposition-grows-with-lawmakers-attorneys-decrying-courthouse-arrests-a-violation-of-due-process/> (hereinafter "Seiwell re: ICE Opposition Grows"); Jenna DeAngelis, *NYC Officials Lead "ICE Watch And Accompaniment" Effort at Federal Immigration Court. Here's What It Means*, CBS News (July 3, 2025, 6:59 PM), <https://www.cbsnews.com/newyork/news/nyc-ice-watch-federal-immigration-court/>; Jim Vertuno, *Honduran Family Freed From Detention After Lawsuit Against ICE Courthouse Arrests*, Associated Press (July 3, 2025, 6:14 PM), <https://apnews.com/article/ice-family-children-lawsuit-release-ef8d764aebec8ba1b67bafc9080a563d>; Swasti Singhai, *San Diego Volunteers Bear Witness Daily as ICE Continues Courtroom Arrests*, Times of San Diego (July 3, 2025, 3:41 PM), <https://timesofsandiego.com/life/2025/07/03/san-diego-community-bears-witness-as-ice-continues-courtroom-arrests/> (hereinafter, "Singhai re: Volunteers"); Emma Seiwell, *ICE Agents Now Snatching Migrants With Open Court Cases; NY Officials, Lawyers Say It's 'Utterly Unlawful'*, NY Daily News (July 3, 2025, 6:50 AM), <https://www.nydailynews.com/2025/07/02/ice-agents-now-snatching-migrants-with-open-court-cases-nyc-officials-lawyers-say-its-utterly-unlawful/> (hereinafter "Seiwell re: ICE Snatching"); Shelby Bremer, *Lawsuit Over San Diego Immigration Court Arrest May Give Insight Into ICE Practices*, NBC San Diego (July 2, 2025, 6:01 PM), <https://www.nbcsandiego.com/news/local/san-diego-lawsuit-ice-courthouse-arrests/3861107/>; Melissa Gomez, *Faith Leaders Bear Witness as Migrants Make Their Case in Immigration Court*, Los Angeles Times (July 2, 2025, 3:00 AM), <https://www.latimes.com/california/story/2025-07-02/faith-leaders-bear-witness-as-migrants-make-their-case-immigration-court> (hereinafter, "Gomez re: Faith Leaders"); Madeleine May & Hannah Marr, *Afghan Ally Detained by ICE After Attending Immigration Court Hearing*, CBS News (July 1, 2025, 1:48 PM), <https://www.cbsnews.com/news/afghan-ally-detained-by-ice-immigration-court/>; Margaret Kadifa, *For One S.F. Asylum Seeker, ICE Arrest Meant Move to More Conservative Judge*, Mission Local (July 1, 2025, 4:00 AM), <https://missionlocal.org/2025/07/sf-asylum-seeker-immigration-judge-ice-arrest/> (hereinafter "Kadifa re: Forum Shopping"); Dean Moses, *ICE Raids Continue in Lower Manhattan Court as Immigrant Advocates Rail Against 'Trump's*

Personal Army, AMNY (July 1, 2025), <https://www.amny.com/news/ice-raids-lower-manhattan-court-trump-07012025/> (hereinafter, “Moses re: ICE Raids”); Natali Yahr, *Wisconsin Asylum Seeker Miguel Robles Detained in Unprecedented Wave of Courthouse Arrests*, Racine County Eye (July 1, 2025), <https://racinecountyeve.com/2025/06/30/miguel-robles-immigration-asylum/>; Gwynne Hogan, *He Fled Death Threats for Being Gay, Applied for Asylum and Married a U.S. Citizen. ICE Arrested Him Anyway*, The City (June 30, 2025, 1:41 PM), <https://www.thecity.nyc/2025/06/27/ice-arrested-asylum-gay/> (hereinafter “Hogan re: Mamadou Arrest”); Ko Lyn Cheang, *S.F. Drag Performer Detained by ICE After Asylum Hearing*, San Francisco Chronicle (June 28, 2025), <https://www.sfchronicle.com/sf/article/drag-performer-detained-ice-20399122.php>; Anna-Cat Brigida, *A Legal Trap? Why the Trump Administration is Targeting Immigration Courts for Arrests*, Al Jazeera (June 27, 2025), <https://www.aljazeera.com/news/longform/2025/6/27/why-the-trump-administration-is-targeting-immigration-courts-for-arrests>; Julia Marnin, *6-Year-Old Boy with Leukemia Arrested by ICE is Now Detained in Texas, Suit Says*, Fort Worth Star-Telegram (June 26, 2025, 3:23 PM), <https://www.star-telegram.com/news/state/texas/article309472695.html>; Dan Katz, *ICE Arrested a 6-Year-Old Boy with Leukemia at Immigration Court. His Family is Suing*, Texas Public Radio (June 25, 2025, 11:06 PM), <https://www.tpr.org/border-immigration/2025-06-25/ice-arrested-a-6-year-old-boy-with-leukemia-at-immigration-court-his-family-is-suing>; Junyao Yang, *Tracking Every ICE Action in San Francisco So Far*, Mission Local (June 25, 2025, 11:30 AM), <https://missionlocal.org/2025/06/sf-ice-arrests-tracker/>; Luis Ferré-Sadurní, *They Had Come to Graduate. Their Minds Were on a Student Held by ICE*, NY Times (June 25, 2025), <https://www.nytimes.com/2025/06/25/nyregion/immigrant-students-graduation-ice.html>; Nina Shapiro, *As Pushback Grows to WA Immigration Court Arrests, ICE Changes Tactics*, The Seattle Times (June 24, 2025, 6:00 AM), <https://www.seattletimes.com/seattle-news/as-pushback-grows-to-wa-immigration-court-arrests-ice-changes-tactics/> (hereinafter “Shapiro re: ICE Tactic Change”); Kate Morrissey, *Here’s What’s Happening to the People ICE Arrests in Immigration Court*, Capital & Main (June 24, 2025), <https://capitalandmain.com/heres-whats-happening-to-the-people-ice-arrests-in-immigration-court>; Elizabeth L.T. Moore & Elizabeth Zavala, *Obscure San Antonio Court Becomes Flashpoint in Immigration Debate*, San Antonio Express-News (June 23, 2025), <https://www.expressnews.com/news/article/obscure-san-antonio-immigration-court-spotlight-20381608.php>; Ray Sanchez & Allsha Ebrahimji, *Masked Ice Officers: The New Calling Card of The Trump Administration’s Crackdown*, CNN (June 21, 2025), <https://www.cnn.com/us/ice-immigration-officers-face-masks>; Ken Stone, *ICE Agents Scatter As SD Bishop Pham, Other Clergy Visit Immigration Court*, Times of San Diego (June 20, 2025, 3:04 PM), <https://timesofsandiego.com/life/2025/06/20/ice-agents-scatter-as-sd-bishop-pham-other-clergy-visit-immigration-court/>; Luis Ferré-Sadurní, *Brad Lander Tried to Escort Immigrants facing Arrest. He’s Not Alone*, NY Times (June 19, 2025), <https://www.nytimes.com/2025/06/19/nyregion/ice-immigrants-volunteer-escorts-courthouse.html> (hereinafter “Ferré-Sadurní re: Lander Escort”); Luis Ferré-Sadurní, *Brad Lander is Arrested by ICE Agents at Immigration Courthouse*, NY Times (June 17, 2025), <https://www.nytimes.com/2025/06/17/nyregion/brad-lander-immigration-ice.html> (hereinafter “Ferré-Sadurní re: Lander Arrest”); Lily Celeste, *ICE Detains Three People Attending Their Immigration Hearings in Harlingen*, KRGV.Com (June 15, 2025, 6:40 PM), <https://www.krgv.com/news/ice-detains-three-people-outside-harlingen-immigration-court/>; Stephen Hobbs, *In Sacramento’s Immigration Court, ICE Detention Threats Leave Residents in Limbo*, The Sacramento Bee (June 14, 2025, 10:05 AM), <https://www.sacbee.com/news/politics-government/capitol-alert/article308346910.html> (hereinafter “Hobbs re: Sacramento Immigr. Ct. Arrests”); David Manoucheri, *ICE Agents Wait at Immigration Court in Sacramento for 2d Consecutive Day, Take Someone Into Custody*, KCRA3 (June 12, 2025, 2:53 PM), <https://www.kcra.com/article/ice-agents-immigration-court-sacramento-custody/65049263>; Ryan Oehrli, *‘Rigged’? ICE Agents Are Arresting People at Charlotte’s Immigration Court*, The Charlotte Observer (June 12, 2025, 11:31 AM), <https://www.charlotteobserver.com/news/local/crime/article308209165.html>; Thomas Lyons, *Mood is Tense at Concord Immigration Court Following ICE Arrests*, Berkleyside (June 12, 2025, 9:55 AM), <https://www.berkeleyside.org/2025/06/12/concord-immigration-court-tension-after-ice-arrests>; Ida Domingo, *ICE Arrests 10 at Sterling, Virginia Immigration Court During Enforcement Operation*, ABC 7 News (June 12, 2025, 6:13 AM), <https://wjla.com/news/local/ice-arrests-10-people-sterling-virginia-immigration-court-agents-detain-enforcement-deportation-salvadoran-venezuelan-peruvian-noncitizens-operation-fairfax-county-courtroom-photos-video->

[homeland-security-trump-administration-illegal](#); Armando Garcia, *Immigrant Rights Group Say ICE Officers ‘Ambush Noncitizens’ in Courthouse Arrests, Ask Judge to Intervene*, ABC News (June 12, 2025, 10:32 AM), <https://abcnews.go.com/US/immigrant-rights-groups-ice-officers-ambush-noncitizens-courthouse/story?id=122770040>; Ximena Bustillo, *ICE’s Novel Strategy Allows for More Arrests from Inside Immigration Courts*, NPR (June 12, 2025, 5:02 AM), <https://www.npr.org/2025/06/12/nx-s1-5409403/trump-immigration-courts-arrests>; *ICE Arrests People at the Annandale Immigration Court*, Annandale Today (June 12, 2025), <https://annandaletoday.com/ice-arrests-people-at-the-annandale-immigration-court/>; Hanna Pampaloni, *ICE Makes Arrests at Sterling Immigration Court*, Loudoun Now (June 12, 2025), https://www.loudounnow.com/news/ice-makes-arrests-at-sterling-immigration-court/article_f8f7118c-aca1-4a8d-ad6e-99826fa77eb6.html; Luis Ferré-Sadurní, *Inside a Courthouse, Chaos and Tears as Trump Accelerates Deportations*, NY Times (June 12, 2025), <https://www.nytimes.com/2025/06/12/nyregion/immigration-courthouse-arrests-trump-deportation.html> (hereinafter “Ferré-Sadurní re: Inside NYC Immigr. Cts.”); Carolina Estrada, *Two Men Detained by ICE After Sacramento Immigration Court Hearings*, KCRA3 (June 11, 2025, 11:13 PM), <https://www.kcra.com/article/two-men-detained-by-ice-sacramento-immigration-hearings/65041264> (hereinafter, “Estrada re: Two Arrests”); Stephen Hobbs, *Two Men Handcuffed at Sacramento Immigration Court, Taken to ICE Office*, The Sacramento Bee (June 11, 2025, 6:09 PM), <https://www.sacbee.com/news/politics-government/capitol-alert/article308401280.html>; Martha Bellisile et al., *Immigration Officers Intensify Arrests in Courthouse Hallways on a Fast Track to Deportation*, Associated Press (June 11, 2025, 4:17 PM), <https://apnews.com/article/immigration-court-arrests-ice-deportation-99d822cdc93ae7dc26026c27895d5ea1> (hereinafter “Bellisile et al. re: Immigration Officers Intensify Arrests”); Brittany Taylor et al., *Second Day of Arrests by ICE Agents at Immigration Court in Southwest Houston*, Click 2 Houston.com (June 11, 2025, 10:25 AM), <https://www.click2houston.com/news/local/2025/06/11/ice-agents-stationed-outside-immigration-court-in-houstons-greenspoint-area/>; Hamed Aleaziz, *Under Pressure From the White House, ICE Seeks New Ways to Ramp Up Arrests*, NY Times (June 11, 2025), <https://www.nytimes.com/2025/06/11/us/politics/ice-la-protest-arrests.html>; Priscilla Alvarez, *ICE Protest Nationwide Comes As Agency Scrambles to Meet Trump’s Immigration Arrest Quotas*, CNN (June 10, 2025, 10:16 PM), <https://www.cnn.com/2025/06/10/politics/ice-scrambles-immigration-arrest-quotas>; Conrad Wilson, *ICE Arrests 2 More Asylum Seekers at Immigration Court in Portland*, OPB (June 10, 2025, 5:12 PM), <https://www.opb.org/article/2025/06/10/ice-arrests-2-more-asylum-seekers-at-immigration-court-in-portland/> (hereinafter, “Wilson re: Two Arrests”); Margaret Kadifa et al., *S.F. Immigration Court Shuts Down After ICE Protests, Arrests*, Mission Local (June 10, 2025, 12:43 PM), <https://missionlocal.org/2025/06/video-ice-agents-arrest-people-outside-s-f-courthouse/>; Ninfa Saavedra & Robert Arnold, *ICE Arrests Multiple People at Houston’s Immigration Court*, Click2Houston.com (June 10, 2025, 2:48 PM), <https://www.click2houston.com/news/local/2025/06/10/ice-arrests-reportedly-underway-at-houstons-immigration-court/>; Natalie Weber, *ICE Detains Multiple Men at Houston Immigration Courthouse, Civil Rights Organization Says*, Houston Public Media (June 10, 2025, 11:58 AM), <https://www.houstonpublicmedia.org/articles/news/politics/immigration/2025/06/10/523600/ice-detains-multiple-men-at-houston-immigration-courthouse/>; Giulia McDonnell Nieto del Rio, *This Is What An ICE Arrest in Boston Immigration Court Looks Like*, Boston Globe (June 9, 2025, 6:31 AM), <https://www.bostonglobe.com/2025/06/09/metro/ice-arrests-at-boston-immigration-court/> (hereinafter, “Nieto del Rio re: Inside Boston Immigr. Ct. Arrest”); Audrey Conklin & Bill Melugin, *Trump’s ICE Launches Bold Courthouse Migrant Arrest Strategy to Fast-Track Deportations Biden Avoided*, Fox News (June 9, 2025, 4:00 AM), <https://www.foxnews.com/us/trumps-ice-launches-bold-courthouse-migrant-arrest-strategy-fast-track-deportations-biden-avoided?msocid=1cd283b1756f61231883976574c46057>; Conrad Wilson, *ICE Detains Another Asylum-Seeker Outside Portland Courtroom, Legal Petition Says*, OPB (June 6, 2025, 9:30 AM), <https://www.opb.org/article/2025/06/06/asylum-arrest-portland-yzlh/> (hereinafter “Wilson re: Arrest”); Michael Elsen-Rooney, *Their Student Was Detained by ICE. Now this Bronx School is Rallying to Get Him Back*, Chalkbeat New York (June 5, 2025, 7:33pm), <https://www.chalkbeat.org/newyork/2025/06/05/nyc-student-detained-by-ice-supported-by-ellis-prep-bronx-school-community/>; Bennett Haerberle, *In Chicago & Elsewhere, ICE Increases Enforcement in Immigration Court*, 5 Chicago (June 5, 2025, 5:54 PM), <https://www.nbcchicago.com/investigations/in-chicago-and-elsewhere-ice-increases-enforcement-in-immigration->

[court/3761730/](#); Megan Ulu-Lani Boyanton, *At Least Eight People Detained at Denver Immigration Court as ICE Presence Increases, Advocates Say*, The Denver Post (June 5, 2025, 5:04 PM), <https://www.denverpost.com/2025/06/05/denver-immigration-court-arrests-ice-trump-advocates/>; Amy Larson, *Newlywed Couple Separated at Immigration Courthouse by ICE*, The Hill (June 5, 2025, 1:14 PM), <https://thehill.com/homenews/state-watch/5334753-immigration-courthouse-ice-trump-dhs/>; Laura Romero et al., *In a New Tactic, ICE Is Arresting Migrants at Immigration Courts, Attorneys Say*, ABC News (June 4, 2025, 6:37 PM), <https://abcnews.go.com/US/new-tactic-ice-arresting-migrants-immigration-courts-attorneys/story?id=122513021>; Julie Carey, *Cancel, Arrest, Deport: Immigration Lawyer Warns of Emerging ICE Tactic*, NBC Washington (June 4, 2025, 3:01 PM), <https://www.nbcwashington.com/news/local/cancel-arrest-deport-immigration-lawyer-warns-of-emerging-ice-tactic/3927509/>; Brad Schmidt, *Immigration Arrest at Courthouse Marks First for Portland*, The Oregonian (June 3, 2025, 3:22 PM), <https://www.oregonlive.com/politics/2025/06/immigration-arrest-at-courthouse-marks-first-for-portland.html>; Stephen Franklin & Katema Hosseini, *ICE Target Noncitizens As Cases Dismissed in Immigration Court in Chicago*, Borderless (June 3, 2025), <https://borderlessmag.org/2025/06/03/ice-arrests-chicago-immigration-court-trump-detention-immigration-custom-enforcement/>; Conrad Wilson, *ICE Detains Asylum Seeker Outside Portland Immigration Court, Lawyers Say*, OPB (June 2, 2025, 11:01 PM), <https://www.opb.org/article/2025/06/02/ice-immigration-enforcement-detains-asylum-seeker-portland-court/>; Angélica Franganillo Díaz & Priscilla Alvarez, *ICE Targets Migrants for Arrest at Courthouses as Trump Administration Intensifies Deportation Push*, CNN (June 2, 2025, 5:00 AM), <https://www.cnn.com/2025/06/02/politics/ice-arrests-migrants-courthouse>; Shelly Bradbury, *Feds Detain Immigrant Family at Denver Courthouse Amid New Trump Strategy*, Denver Post (May 30, 2025, 3:32 PM), <https://www.denverpost.com/2025/05/30/denver-immigration-arrest-courthouse-ice-trump/>; Giulia McDonnell Nieto del Rio, *ICE Arrests at Massachusetts Immigration Courts Target Immigrants Seeking Permission to Stay in US*, Boston Globe (May 30, 2025, 1:39PM), <https://www.bostonglobe.com/2025/05/27/metro/immigration-courts-ice-arrests-massachusetts> (hereinafter, “Nieto del Rio re: Boston Immigr. Ct. Arrests”); Suzanne Gamboa, *Immigration Arrests in Courthouses Have Become the New Deportation Tool, Stripping Migrants of a Legal Process*, NBC News (May 30, 2025, 5:00 AM), <https://www.nbcnews.com/news/latino/immigrations-arrests-ice-deportations-courthouse-legal-process-ice-rca209671>; Hamed Aleaziz et al., *How ICE is Seeking to Ramp Up Deportations Through Courthouse Arrests*, NY Times (May 30, 2025), <https://www.nytimes.com/2025/05/30/us/politics/ice-courthouse-arrests.html>; Carolina Estrada, *‘This is Very Concerning’: 3 Arrested While Attending Hearings at Immigration Court in Sacramento, Groups Say*, KCRA3 (May 29, 2025, 1:37 PM), <https://www.kcra.com/article/sacramento-immigration-court-arrests-ice/64920625>; Allison Sherry, *Signaling a Policy Shift, ICE Detains a Family Who Showed Up at Denver Immigration Court for a Check-In*, CPR News (May 29, 2025, 1:35 PM), <https://www.cpr.org/2025/05/29/ice-detains-family-denver-immigration-court/>; Daniel Gonzalez & Richard Ruelas, *After Short Break, ICE Resumes Arrests at Phoenix Immigration Court, Changes Keep Tactic*, AZ Central (May 29, 2025, 5:01 AM), <https://www.azcentral.com/story/news/politics/immigration/2025/05/29/phoenix-immigration-court-ice-arrests-resume/83767918007/>; Gwynne Hogan, *Migrants, Protestors, and a Pastor Arrested Inside and Outside Manhattan Immigration Courthouses*, The City (May 28, 2025, 3:16 PM), <https://www.thecity.nyc/2025/05/28/ice-arrests-migrants-26-federal-plaza-pastor/>; (hereinafter, “Hogan re: NYC Immigr. Ct. Arrests”); Olivia Hebert, *ICE Stormed SF Court to Arrest 4 Asylum Seekers, Denounced as Unlawful*, SF Gate (May 28, 2025), <https://www.sfgate.com/bayarea/article/asylum-seekers-arrested-ice-san-francisco-20349387.php>; Tomoki Chien, *Undercover ICE Agents Begin Making Arrests at SF Immigration Court*, The San Francisco Standard (May 27, 2025, 5:32 PM), <https://sfstandard.com/2025/05/27/undercover-ice-agents-make-arrests-san-francisco-court/>; Luis Ferré-Sadurní & Dana Rubinstein, *ICE, Shifting Tactics, Detains High School Student at N.Y.C. Courthouse*, NY Times (May 27, 2025), <https://www.nytimes.com/2025/05/27/nyregion/new-york-student-arrested-ice.html>; Michael Elsen-Rooney, *A Bronx High Schooler Showed Up for a Routine Immigration Court Date. ICE Was Waiting*, Chalkbeat New York (May 26, 2025, 8:35 pm), <https://www.chalkbeat.org/newyork/2025/05/27/bronx-high-school-student-detained-by-immigration-ice-agents/?ref=hellgatenyc.com>; Milena Malaver et al., *ICE Agents in Miami Find New Spot to Carry Out Arrests: Immigration Court*, Miami Herald (May 26, 2025, 1:27 PM), <https://www.miamiherald.com/news/local/immigration/article306900486.html>; Melissa Gomez, *Father Ripped from*

Much of the coverage express doubts about the integrity of ICE arrests at immigration courts, describing them as a due process violation and/or a tactic to increase deportations, forum shop, and scare noncitizens into giving up on their immigration cases.³ Some coverage alludes to

Family as Agents Target Immigration Courts, Arresting People After Cases Dismissed, LA Times (May 24, 2025, 10:00AM), <https://www.latimes.com/california/story/2025-05-24/ice-agents-swarm-immigration-courts-arresting-people-after-cases-dismissed> (hereinafter, “Gomez re: Immigr. Ct. Arrests”); Tyche Hendricks, ‘Unprecedented’: ICE Officers Operating Inside Bay Area Immigration Courts, Lawyers Say, KQED (May 24, 2025), <https://www.kqed.org/news/12041473/unprecedented-ice-officers-operating-inside-bay-area-immigration-courts-lawyers-say>; Ted Hesson & Kristina Cooke, *ICE Arrests Migrants at Courthouses, Opens Door to Fast-Track Deportations*, Reuters (May 23, 2025, 4:35PM), <https://www.reuters.com/world/us/ice-arrests-migrants-courthouses-opens-door-fast-track-deportations-2025-05-23/>; Camilo Montoya-Galvez & Nidia Cavazos, *ICE Ending Migrants’ Court Cases In Order to Arrest and Move to Deport Them*, CBS News (May 23, 2025, 9:53 AM), <https://www.cbsnews.com/news/ice-ending-migrants-court-cases-arrest-move-to-deport-them/>; Arelis R. Hernández & Maria Sacchetti, *Immigrant Arrests at Courthouses Signal New Tactic in Trump’s Deportation Push*, Washington Post (May 23, 2025), <https://www.washingtonpost.com/immigration/2025/05/23/immigration-court-arrests-ice-trump/>; Gustavo Solis, *ICE Agents Swarm San Diego Immigration Court, Arresting People After Their Hearings*, KPBS (May 22, 2025, 5:45PM), <https://www.kpbs.org/news/border-immigration/2025/05/22/ice-agents-swarm-san-diego-immigration-court-arresting-people-after-their-hearings>; Trevor Hughes, *ICE Agents Deploy New Tactic: Arresting People As They Leave Mandatory Court Hearings*, USA Today (May 22, 2025, 1:13 PM), <https://www.usatoday.com/story/news/nation/2025/05/22/ice-arrests-immigration-court-deportation-tactics/83792357007/>; Joshua Goodman et al., *They Came to Hearing at Chicago’s Immigration Court, Then Got Arrested*, Chicago Sun-Times (May 22, 2025, 3:59PM), <https://chicago.suntimes.com/immigration/2025/05/22/ice-agents-hallways-immigration-court-trump-mass-arrest>; Anders Hagstrom & Bill Melugin, *ICE Begins New, Nationwide Effort to Arrest Illegal Aliens at Immigration Hearings* (May 22, 2025, 1:07 PM), <https://www.foxnews.com/politics/ice-begins-new-nationwide-effort-arrest-illegal-aliens-immigration-hearings>; Joshua Goodman & Gisela Salomon, *ICE Agents Wait in Hallways of Immigration Court as Trump Seeks to Deliver on Mass Arrest Pledge*, Associated Press (May 22, 2025, 1:30 AM), <https://apnews.com/article/immigration-courts-arrests-trump-ice-deportations-fa96435d4ec021cc8ff636b23d80d848>; J. Dale Shoemaker, *ICE Raids Immigration Court in Buffalo*, Investigative Post (May 22, 2025), <https://www.investigativepost.org/2025/05/22/ice-raids-immigration-court-in-buffalo/>; Raphael Romero Ruiz et al., *For 2nd Day, People Attending Phoenix Immigration Hearings Arrested by ICE*, USA Today (May 21, 2025, 11:42 PM), <https://www.usatoday.com/story/news/politics/immigration/2025/05/21/ice-arrests-phoenix-immigration-court/83772323007/?gnt-cfr=1&gca-cat=p>; Gustavo Sagrero Álvarez, *ICE Agents at Seattle Courthouse Arrest People Whose Deportation Hearings are Dismissed*, KUOW (May 21, 5:45 PM), <https://www.kuow.org/stories/ice-agents-at-seattle-courthouse-arrest-people-whose-deportation-hearings-are-dismissed>; Akela Lacy et al. *ICE Agents Are Camped Outside Immigration Courts to Make Arrests*, The Intercept (May 21, 2025, 3:27 PM), <https://theintercept.com/2025/05/21/ice-agents-courts-arrests-immigrants-deport/>; Paul Ingram, ‘Mayhem’ As ICE Officials Arrest Multiple People at Immigration Court in Phoenix, AZ Mirror (May 21, 2025, 11:12 AM), <https://azmirror.com/2025/05/21/mayhem-as-ice-officials-arrest-multiple-people-at-immigration-court-in-phoenix/>; Nina Shapiro, *ICE Arrests at WA Immigration Court Spark Fear of Fast-Track Removal*, Seattle Times (May 21, 2025, 6:00 AM), <https://www.seattletimes.com/seattle-news/law-justice/ice-arrests-at-wa-immigration-court-spark-fear-of-fast-track-removal/> (hereinafter, “Shapiro re: ICE Arrests”); Raphael Romero Ruiz & Richard Ruelas, *They Showed Up to Immigration Court in Phoenix. Then Agents Surrounded Them*, USA Today (May 20, 2025), <https://www.usatoday.com/story/news/politics/immigration/2025/05/20/prosecutors-drop-charges-vs-migrants-as-border-agents-wait-outside/83756994007/?gnt-cfr=1&gca-cat=p>

³ Kadifa re: Adult Arrests, *supra* n. 2; Salama, *supra* n. 2; Markey, *supra* n. 2; Mose re: ICE in Court; James, *supra* n. 2; Bellisile et al. re: Volunteers Flock to Immigration Courts, *supra* n. 2; Bellisile, *supra* n. 2; Cole et al., *supra* n. 2; Ferré-Sadurní re: Lawsuit, *supra* n. 2; Rivera et al., *supra* n. 1; Cuevas, *supra* n. 2; Abbot, *supra* n. 2; Bernstein, *supra* n. 2; Thamer, *supra* n. 2; Browning & O’Brien, *supra* n. 2; Economist, *supra* n. 2; Ramos, *supra* n. 2; Li & Cheang, *supra* n. 2;

possible coordination between ICE and EOIR.⁴ Several editorials also decry the arrests as a “set up” and for disregarding due process.⁵

Arrests at immigration courts have outraged Americans around the country. Opposition to these actions and doubts about their legality have prompted mass protests at immigration courts in New York, Seattle, San Francisco, and elsewhere.⁶ It has also prompted clergy, political leaders,

Tavernise, *supra* n. 2; Khan, *supra* n. 2; DeAngelis, *supra* n. 2; Seiwel re: ICE Opposition Grows, *supra* n. 2; Singhai re: Volunteers, *supra* n. 2; Kadifa re: Forum Shopping, *supra* n. 2; Moses re: ICE Raids, *supra* n. 2; Yahr, *supra* n. 2; Hogan re: Mamadou Arrest, *supra* n. 2; Cheang, *supra* n. 2; Brigida, *supra* n. 2; Katz, *supra* n. 2; Morrissey, *supra* n. 2; Moore & Zavala, *supra* n. 2; Hobbs re: Sacramento Immigr. Ct. Arrests, *supra* n. 2; Lyons, *supra* n. 2; Oehrli, *supra* n. 2; Bustillo, *supra* n. 2; Bellisile et al. re: Immigration Officers Intensify Arrests, *supra* n. 2; Wilson re: Two Arrests, *supra* n. 2; Kadifa et al., *supra* n. 2; Nieto del Rio re: Inside Boston Immigr. Ct. Arrest, *supra* n. 2; Conklin & Melugin, *supra* n. 2; Wilson re: Arrest, *supra* n.14; Romero et al., *supra* n.14; Carey, *supra* n. 2; Franklin & Hosseini, *supra* n. 2; Bradbury, *supra* n. 2; Nieto del Rio re: Boston Immigr. Ct. Arrests, *supra* n. 2; Gamboa, *supra* n. 2; Aleaziz et al., *supra* n. 2; Gonzalez & Ruelas, *supra* n. 2; Hebert, *supra* n. 2; Chien, *supra* n. 2; Elsen-Rooney re: Dylan Arrest, *supra* n. 2; Malaver et al., *supra* n. 2; Gomez re: Immigr. Ct. Arrests, *supra* n. 2; Hernández & Sacchetti, *supra* n. 2; Solis, *supra* n. 2; Hughes, *supra* n. 2; Goodman et al., *supra* n. 2; Goodman & Salomon, *supra* n. 2; Shoemaker, *supra* n. 2; Ruiz et al., *supra* n. 2; Álvarez, *supra* n. 2; Lacy et al., *supra* n. 2; Ingram, *supra* n. 2; Shapiro re: ICE Arrests, *supra* n. 2; Seiwel re: ICE Snatching, *supra* n. 2; Hendricks, *supra* n. 2; Schmidt, *supra* n. 2.

⁴ Ferré-Sadurní re: Lawsuit, *supra* n. 2; Bernstein, *supra* n. 2; Khan, *supra* n. 2; Yahr, *supra* n. 2; Aleaziz, *supra* n. 2; Conklin & Melugin, *supra* n. 2; Aleaziz et al., *supra* n. 2; Gomez re: Immigr. Ct. Arrests, *supra* n. 2; Díaz & Alvarez, *supra* n. 2.

⁵ Veronica Cardenas, *I Was Once an ICE Prosecutor. What I See Now in Immigration Courts Is Disturbing*, The Hill (July 17, 2025, 8:00AM), <https://thehill.com/opinion/immigration/5404863-i-was-once-an-ice-prosecutor-what-i-see-now-in-immigration-courts-is-disturbing/>; Brian Strassburger, S.J. & William Critchley-Menor, S.J., *What We Saw During An ICE Arrest & Immigration Court Hearing: The Breakdown of Justice in America*, America: The Jesuit Review (July 11, 2025), <https://www.americamagazine.org/politics-society/2025/07/11/ice-immigration-court-deportation-injustice-251119>; *Trump Disregards Due Process in Our Nation's Immigration Courts*, San Antonio Express-News (June 27, 2025), <https://www.expressnews.com/opinion/editorial/article/ice-arrest-immigration-court-texas-20395342.php>; *Masked ICE Arrests Raise Urgent Questions About U.S. Immigration Practices*, The Riverdale Press (June 26, 2025), <https://www.riverdalepress.com/stories/masked-ice-arrests-raise-urgent-questions-about-us-immigration-practices.187060>.

⁶ Thamer, *supra* n. 2; Browning & O'Brien, *supra* n. 2; Alicia Victoria Lozano, *Violent Clashes at San Francisco Immigration Court Won't Deter Protestors, Organizers Say*, NBC News (July 10, 2025, 4:43 PM), <https://www.nbcnews.com/news/us-news/violent-clashes-san-francisco-immigration-court-wont-deter-protesters-rcna218059>; Sarah Rumpf-Whitten, *Watch: ICE Agents Fight Off Masked Mob Outside Blue City Immigration Court*, FOX News (July 10, 2025, 1:12 PM), <https://www.foxnews.com/us/watch-ice-agents-fight-off-masked-mob-outside-blue-city-immigration-court>; Shay Arthur, *Crowd Gathers for Immigration Rally at Memphis Court*, WREG Memphis (July 8, 2025, 12:07 PM), <https://wreg.com/news/local/crowd-gathers-for-immigration-rally-at-memphis-court/>; Ramos, *supra* n. 2; Regalado & Karlamangla, *supra* n. 2; Li & Cheang, *supra* n. 2; Khan, *supra* n. 2; DeAngelis, *supra* n. 2; Stephania Jimenez, *PSL San Antonio Organizes Event to Educate Community on Immigration Laws Amid Rising ICE Deportations*, KSAT (July 1, 2025, 10:42 PM), <https://www.ksat.com/news/local/2025/07/02/psl-san-antonio-organizes-event-to-educate-community-on-immigration-laws-amid-rising-ice-deportations/>; May & Marr, *supra* n. 2; Shapiro re: ICE Tactic Change, *supra* n. 2; Ferré-Sadurní re: Lander Arrest, *supra* n. 2; Moore & Zavala, *supra* n. 2; Greg Micek et al., *Sacramento Immigration Court on Lockdown, Draws Protest After Suspected ICE Operation*, Capradio (June 12, 2025), <https://www.capradio.org/articles/2025/06/12/sacramento-immigration-court-on-lockdown-draws-protest-after-suspected-ice-operation/>; Hobbs re: Sacramento Immigr. Ct. Arrests, *supra* n. 2; Lyons, *supra* n. 2; Ferré-Sadurní re: Inside NYC Immigr. Cts., *supra* n. 2; Bellisile et al. re: Immigration Officers Intensify Arrests, *supra* n.

and other members of the public to accompany noncitizens to their immigration court dates to stop ICE from detaining noncitizens when they exit courtrooms, document arrests that occur, and help arrestees inform their families.⁷ At least four federal judges have also deemed specific arrests at immigration courts unlawful and ordered ICE to release the arrestees,⁸ while a class of noncitizens represented by several rights groups has also sued to stop the arrests nationwide.⁹

Responsive records will address critical integrity questions left open by existing media coverage. Such records will show the extent of EOIR's involvement in ICE arrests in and near its immigration courts and what instructions and guidance EOIR has provided to immigration judges, court administrators, and other immigration court staff regarding these arrests.

B. URGENCY TO INFORM THE PUBLIC ABOUT FEDERAL GOVERNMENT ACTIVITY BY A REQUESTER

Additionally, and alternatively, the Council has a compelling need for the records sought. It is primarily engaged in disseminating information. And urgency also exists to inform the public about the extent of EOIR's involvement in ICE arrests in and near its immigration courts and any instructions and guidance the agency has provided to immigration judges, court administrators, and other immigration court staff about these arrests.

1. *The Council Primarily Engages in Information Dissemination*

The Council primarily engages in disseminating information and analysis on immigration and other issues. Organizations primarily engaged in information dissemination include not only “media organizations and newspapers,” *Heritage Found. v. Entl. Prot. Agency*, Civil Action No. 23-748, 2023 WL 2954418, *3 (D.D.C. 2023), but also “non-partisan law and public policy group[s]”

2; Alvarez, *supra* n. 2; George Kelly & Max Harrison-Caldwell, Protesters Shut Down Immigration Court After ICE Arrests, *The San Francisco Standard* (June 10, 2025, 1:00 PM), <https://sfstandard.com/2025/06/10/protesters-surround-immigration-court-after-ice-arrests/>; Kadifa et al., *supra* n. 2; Weber, *supra* n. 2; Joe Rivano Barros et al., *S.F. Police Arrest Dozens in 2nd Night of Protests Against ICE*, *Mission Local* (June 9, 2025, 8:16 PM), <https://missionlocal.org/2025/06/sf-mission-march-mobilized-thousands-against-ice/>; Boyanton, *supra* n. 2; Aleaziz et al., *supra* n. 2; Hogan re: NYC Immigr. Ct. Arrests; Ruiz et al, *supra* n. 2.

⁷ Salama, *supra* n. 2; Markey, *supra* n. 2; Mose re: ICE in Court; Bellisile et al. re: Volunteers Flock to Immigration Courts, *supra* n. 2; Ferré-Sadurní re: Lawsuit, *supra* n. 2; Belz, *supra* n. 2; Thamer, *supra* n. 2; Strassburger & Critchley-Menor, *supra* n. 5; Ciara Encinas, *Volunteers Describe How They Document ICE Arrests in Immigration Courts*, *Fox 5* (July 11, 2025, 4 :55 PM), <https://fox5sandiego.com/news/local-news/san-diego/san-diego-court-ice-arrests/>; Zavala, *supra* n. 2; Joey Safchik, *ICE Handcuffs 71-Year-Old Grandmother, a US Citizen, at San Diego Immigration Court*, *7 San Diego* (July 9, 2025, 7 :06 PM), <https://www.nbcsandiego.com/news/local/ice-arrests-71-year-old-grandmother-a-us-citizen-at-san-diego-immigration-court/3865098/>; Ramos, *supra* n. 2; Rossoto, *supra* n. 2; Khan, *supra* n. 2; Singhai re: Volunteers, *supra* n. 2; Gomez re : Faith Leaders, *supra* n. 2; Shapiro re: ICE Tactic Change, *supra* n. 2; Sanchez & Ebrahimji, *supra* n. 2; Ferré-Sadurní re: Lander Arrest, *supra* n. 2; Ferré-Sadurní re: Lander Escort, *supra* n. 2; Micek et al., *supra* n. 2; Stone, *supra* n. 2; Hobbs re: Sacramento Immigr. Ct. Arrests, *supra* n. 2; Estrada re: Two Arrests, *supra* n. 2; Boyanton, *supra* n. 2.

⁸ See Markey, *supra* n. 2; Bernstein, *supra* n. 2; Baumhardt, *supra* n. 2; Ramos, *supra* n. 2; Vertuno, *supra* n. 2.

⁹ See, e.g., Rivera et al., *supra* n. 1; Abbot, *supra* n. 2; Bellisile, *supra* n. 2; Cole et al., *supra* n. 2; Ferré-Sadurní re: Lawsuit, *supra* n. 2.

like Requesters that “regularly write[], publish[], and disseminat[e], information online,” *Brennan Ctr. for Just.*, 498 F. Supp. 3d at 98 (Brennan Center); see also *Ctr. for Pub. Integrity v. U.S. Dep’t of Def.*, 411 F. Supp. 3d 5 (D.D.C. 2019) (Center for Public Integrity); *Protect Dem. Proj. v. U.S. Dep’t of Def.*, 263 F. Supp. 3d 293, 298 (D.D.C. 2017) (Protect Democracy Project); *Am. Civil Liberties Union*, 321 F. Supp. 2d at 29 n.5 (Electronic Privacy Information Center (“EPIC”)).

Like Brennan Center, Protect Democracy Project, EPIC, and Center for Public Integrity, the Council authors factsheets and special reports on proposed and actual immigration policies, some of which shape media coverage in outlets across the nation.¹⁰ It also analyzes immigration data and other government records—including those obtained through FOIA requests like this one—in interactive web reports.¹¹ And it circulates its reports and factsheets through its website,¹² blog, email newsletters, and an X (formerly known as Twitter) account with 64.9 thousand followers.¹³

2. Urgency Exists to Inform the Public

Urgency also exists to inform the public about the extent of EOIR’s involvement in ICE arrests in and near its immigration courts and any instructions and guidance the agency has provided to immigration judges, court administrators, and other immigration court staff about these arrests.

Requisite urgency exists where “the request touches on ‘a matter of current exigency to the American public’” and delay “compromises a significant recognized interest.” *Protect Dem. Proj.*, 263 F. Supp. 3d 293 at 299 (quoting *Al-Fayed v. CIA*, 254 F.3d 300, 310 (D.C. Cir. 2001)). The above topics are exigent to the American public, as demonstrated by the one hundred twenty plus articles discussing them cited in this request and the mass protests outside immigration courts. See *CREW*, 2025 WL 752367, at *13 (finding urgency to inform the public based on at least fifty

¹⁰ See, e.g., *Trump-Backed Mass Deportations Would Cost Billions*, Report Says, CBS News (Oct. 3, 2024), <https://www.cbsnews.com/video/trump-backed-mass-deportations-would-cost-billions-report/> (discussing Am. Immigr. Council, *Mass Deportation: Devastating Costs to America, Its Budget and Economy* (Oct. 2, 2024), <https://www.americanimmigrationcouncil.org/report/mass-deportation/>); Emma Goldberg, *What if Trump Deported Millions of Immigrants*, The New York Times (Oct. 22, 2024), https://www.nytimes.com/interactive/2024/10/22/us/elections/trump-deportation.html?unlocked_article_code=1.Uk4.Pjao.990iYFTTpEl6 (same); *What Trump’s Mass Deportation Plan Might Look Like If He Wins the Election*, 60 Minutes (Oct. 27, 2024), <https://www.youtube.com/watch?v=WjCHjwLSMFI> (same); *Mass Deportations*, Last Week Tonight (Oct. 27, 2024), <https://www.youtube.com/watch?v=0UEhMDAIX1Y> (same); *The Costs of Mass Deportation? Expert Breaks Down Trump’s Immigration Plan*, Amanpour & Company, (Oct. 28, 2024), <https://www.youtube.com/watch?v=Dmfo3atidKE> (same).

¹¹ See Am. Immigr. Council, *Torrance County Detention Facility: Troubling Role in Detaining Haitian Migrants During the 2021 Del Rio Incident* (2024), <https://www.americanimmigrationcouncil.org/foia/torrance-detention-facility/>; Am. Immigr. Council, *Ohio, We Have a Problem: Border Patrol & Local Law Enforcement’s Patterns & Tactics of Abuse in Ohio’s Immigration Enforcement* (2024), <https://www.americanimmigrationcouncil.org/foia/ohio-border-patrol-abuse/>; Am. Immigr. Council, *Refugee Resettlement in U.S. Cities* (2019), https://data.americanimmigrationcouncil.org/en/refugee-resettlement-us/#exploratory_tool

¹² The Council’s website received 4,506,460 views from 2,952,034 different users in 2024.

¹³ See <https://x.com/immrcouncil>.

articles on the issue); *Am. Civil Liberties Union of No. Cal. v. U.S. Dep't of Def.*, No. C 06-01698, 2006 WL 1469418, at *6 (N.D. Cal. May 25, 2006) (same); 28 C.F.R. § 16.5(e)(3) (“The existence of numerous articles published on a given subject can be helpful to establishing the requirement that there be an ‘urgency to inform’ the public on the topic.”).

Delayed production of EOIR policies and guidance for ICE arrests at and near immigration courts would compromise the ongoing public debate about these arrests’ propriety. *Cf. CREW*, 2025 WL 752367, at *13 (expediting a request for records about the U.S. DOGE Service); *Protect Dem. Proj.*, 263 F. Supp. 3d 293 at 299 (expediting a request for records about a possible unlawful airstrike on Syria); *Am. Civil Liberties Union of N. Cal. v. U.S. Dep't of Def.*, No. C. 06-01698, 2006 WL 1469418, at *6-7 (N.D. Cal. May 25, 2006) (expediting a request for records about possible unlawful military surveillance of protestors); *Freedom Coalition of Doctors for Choice v. Ctrs. For Disease Control & Prevention*, 2:23-cv-102, 2024 WL 69084, at *14 (N.D. Tex. Jan. 5, 2024) (expediting a request disputing the effectiveness of COVID-19 vaccines).

IV. FEE WAIVER REQUEST

Requestors seek a fee waiver since “disclosure of the requested records is in the public interest.” 5 U.S.C. § 552(a)(4)(A)(iii). EOIR must construe “the FOIA fee waiver provision ... liberally ... in favor of waivers for noncommercial requesters” like Requesters. *Schoenman v. FBI*, 604 F. Supp. 2d 174, 188 (D.D.C. 2009). Disclosure is in the public interest where it (A) “is likely to contribute significantly to public understanding of the operations or activities of the government” and (B) “is not primarily in the commercial interest of the [R]equesters.” 5 U.S.C. § 552(a)(4)(A)(iii); *see also* 28 C.F.R. § 16.10(k)(1). Requesters satisfy both requirements.

A. DISCLOSURE OF THE INFORMATION IS IN THE PUBLIC INTEREST

Disclosing the requested records is likely to contribute significantly to the public’s understanding of the extent of EOIR’s involvement in ICE arrests in and near its immigration courts and any instructions and guidance the agency has provided to immigration judges, court administrators, and other immigration court staff about these arrests.

EOIR must consider two factors when assessing a disclosure’s contribution to public understanding of a government activity or operation, *see* 28 C.F.R. § 16.10(k)(2): (i) whether the request has a “direct and clear” rather than “remote or attenuated” connection to “identifiable operations or activities of the federal government”; and (ii) whether disclosure “would be likely to contribute significantly to public understanding of those operations or activities.” *Id.* § 16.10(k)(2)(i)-(ii). Each factor supports a fee waiver here.

1. Request Has a Direct and Clear Connection to Government Operations or Activities

First, this request has a direct and clear relation to the following governmental operations and activities: EOIR’s role in ICE enforcement operations at or near immigration courts and the

instructions it has provided to immigration judges and other court staff about ICE arrests at its facilities.

2. *Records Sought Will Contribute Significantly to Public Understanding of the Above*

Second, disclosing the records sought will “contribute significantly to public understanding of” the above activities. *Id.* § 16.10(k)(2)(ii). Such contribution exists where “[d]isclosure of the requested information [is] meaningfully informative about [these] activities” and “contribute[s] to the understanding of a reasonably broad audience of persons interested in the subject, as opposed to the individual understanding of the requester.” *Id.* § 16.10(k)(2)(ii)(A)-(B). Both criteria are satisfied here.

i. DISCLOSURE OF RECORDS IS MEANINGFULLY INFORMATIVE

Disclosing requested records will be meaningfully informative about EOIR’s exact role in ICE enforcement operations at or near immigration courts. Disclosure is meaningfully informative where disclosed information is not “in the public domain, in either the same or a substantially identical form.” *Id.* § 16.10(k)(2)(ii)(A).

Here, as demonstrated by the media coverage cited above, the public only knows that ICE is arresting noncitizens at or near immigration courts after moving to dismiss their immigration cases and that immigration judges are granting many dismissals, thereby allowing ICE to pursue expedited removal.¹⁴ Public knowledge does not extend to the exact guidance that immigration judges and other court staff are receiving from their superiors about ICE arrests in and around immigration court and EOIR’s role in these arrests. Requested records are therefore “meaningfully informative” about each of these activities.

ii. DISCLOSURE OF RECORDS CONTRIBUTES TO UNDERSTANDING OF A REASONABLY BROAD AUDIENCE

Disclosing requested records will contribute to the understanding of a reasonably broad audience of persons interested in EOIR’s role in ICE arrests at or near immigration courts.

Requesters presumably satisfy this consideration as representatives of the news media. *Id.* § 16.10(k)(2)(ii)(B). They both “gather[] information of potential interest to a segment of the public, use[] [their] editorial skills to turn the raw materials into a distinct work, and distribute[] that work to an audience.” *Id.* § 16.10(b)(6); *see also Serv. Women’s Action Network v. Dep’t of Def.*, 888 F. Supp. 2d 282, 287-88 (D. Conn. 2012) (finding that ACLU is a news media representative); *cf. Elec. Privacy Info. Ctr. v. Dep’t of Def.*, 241 F. Supp. 2d 5, 10-15 (D.D.C. 2003) (finding that an organization similar to the Council is a news media representative).

¹⁴ *See generally* Media articles cited in footnotes 2-9.

Additionally, and alternatively, the ongoing and extensive media coverage in nationwide, state, and local outlets about ICE arrests at and near immigration courts demonstrates interest in these subjects by a reasonably broad audience. Requesters intend and are well-equipped to inform this audience about the information contained in responsive records, as they are experts in educating the public about immigration issues.

As detailed further in the expedited processing section, the Council analyzes government records—including those obtained through FOIA requests like this one—in interactive web reports and other publications available for free on its website.¹⁵ And it circulates these publications for free through its website,¹⁶ blog, email newsletters, and X an account with 64.9 thousand followers. It intends to publish content about records obtained from this request on its website and otherwise disseminate that content to its readers and the larger public.

Similarly, LatinoJustice PRLDEF produces newsletters, blogs, reports, opinion, editorials, and video interviews about the constitutional rights and equal protection of Latinos, immigrants, and other marginalized communities.¹⁷ And it circulates these publications for free through its social media accounts. All of its materials are free and available to the public on its website.

In sum, Requesters intend to analyze the records they receive from this request and educate a broad audience of the interested public about them. And, Requesters have a demonstrated ability to do so.

B. REQUESTERS' LACK OF COMMERCIAL INTEREST

Turning to commercial interest, disclosure is not primarily in Requesters' commercial interest. As nonprofits, Requesters have no commercial interest in the records requested. *See Am. Ctr. for L. & Just. v. U.S. Dep't of Homeland Sec.*, 573 F. Supp. 3d 78, 84 (D.D.C. 2021) (“[N]onprofit organizations by definition have no commercial interests.”); *Am. Immigr. Council v. U.S. Dep't of Homeland Sec.*, 82 F. Supp. 3d 396, 406 (D.D.C. 2015) (finding that the Council has no such interest in its record requests). Rather, the request furthers Requesters' work to increase public understanding of immigration processes, including EOIR's role in ICE enforcement operations in and around immigration courts and the guidance it has provided to immigration judges and other court staff about these operations.

Alternatively, and additionally, the public interest in obtaining a better understanding of EOIR's actions discussed above exceeds any commercial interest that EOIR may ascribe to Requesters in records responsive to this request.

¹⁵ See, e.g., *Torrance County Detention Facility: Troubling Role in Detaining Haitian Migrants During the 2021 Del Rio Incident*, *supra* n. 11; *Ohio, We Have a Problem: Border Patrol & Local Law Enforcement's Patterns & Tactics of Abuse in Ohio's Immigration Enforcement*, *supra* n. 11; *Refugee Resettlement in U.S. Cities*, *supra* n. 11.

¹⁶ The Council's website received 4,506,460 views from 2,952,034 different users in 2024.

¹⁷ See, e.g., LatinoJustice PRLDEF, *100 Days Later: The Harm So Far to Latinx Communities* (April 2025), <https://www.latinjustice.org/en/pressreport/100-days-later-harm-so-far-latinx-communities>; LatinoJustice PRLDEF, *A Promise to Harm: What's at Stake for the Latino Community in Project 2025* (Oct. 2024), <https://www.latinjustice.org/en/pressreport/promise-harm-whats-stake-latinx-community-project-2025>.

Thank you for your attention to this request. If you have any questions regarding this request, please do not hesitate to contact us.

Very truly yours,

/s/ Chris Opila

Christopher (“Chris”) Opila
Staff Attorney (Transparency)
American Immigration Council
PMB2026
2001 L Street N.W., Suite 500
Washington, DC 20036
202-507-7699 | copila@immcouncil.org

/s/Rex Chen

Rex Chen
Supervising Counsel for Immigrant Rights
LatinoJustice PRLDEF,
475 Riverside Drive Suite 1901
New York, NY 10115
212-219-3360 | rchen@latinojustice.org



July 28, 2025

Via Public Access Link Portal & Certified Mail

U.S. Department of Justice
Executive Office for Immigration Review
Office of General Counsel – FOIA Service Center
5107 Leesburg Pike, Suite 1903
Falls Church, VA 22041

Director of Public Affairs
Office of Public Affairs
Department of Justice,
950 Pennsylvania Avenue NW
Washington, DC 20530-0001

Re: Freedom of Information Act Request on Terminations of Immigration Proceedings and ICE Arrests at Immigration Courts

Dear FOIA Officer:

The American Immigration Council (the “Council”) and LatinoJustice PRLDEF (collectively, “Requesters”) submit this request to U.S. Immigration and Customs Enforcement (“ICE”) under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552.

Since around the middle of May 2025, U.S. Immigration and Customs Enforcement (“ICE”) has been moving to dismiss immigration proceedings against noncitizens in EOIR immigration courts around the country to pursue their expedited removal. Requesters seek certain records about these dismissals as well as expedited processing and a fee waiver.

I. REQUEST FOR INFORMATION

Requesters seek the entry in the following data fields in tbl_Court_Motions for each motion to dismiss that ICE has made in each case in EOIR Case Data from May 1, 2025, until the day of the query:

1. MOTION RECD_DATE;
2. HEARING_LOC_CODE;
3. STRFILINGMETHOD;
4. DEC;
5. APPEAL_RSVD;
6. COMP_DATE; and

7. DECISION_RENDERED.

II. FORMAT OF PRODUCTION

Requesters seek responsive electronic records in a machine-readable, native file format, with all metadata and load files. We request that any data be provided in a workable format, such as Microsoft Excel or comma-separated values (CSV) files. If terms or codes are not in the form template and/or publicly defined, please provide a glossary or other descriptive records containing definitions of acronyms, numerical codes, or terms contained in data responsive to this request.

III. EXPEDITED PROCESSING

Requesters seek expedited processing of this request and certify that the statements herein are “true and correct” pursuant to 28 C.F.R. § 16.5(e)(3). FOIA obligates EOIR to process requests expeditiously in two cases: (i) those where a requester “demonstrates a compelling need”—such as “urgency to inform the public concerning actual or alleged Federal Government activity” if the requester is “primarily engaged in disseminating information,” 5 U.S.C. § 552(a)(6)(E)(i), (v)—and (ii) “in other cases determined by the agency,” *id.* § 552(a)(6)(E)(i), which, for the Department of Justice, include “[a] matter of widespread and exceptional media interest in which there exist possible questions about the government’s integrity which affect public confidence,” 28 C.F.R. § 16.5(e)(1)(ii), (iv). Both cases exist here.

A. A MATTER OF WIDESPREAD AND EXCEPTIONAL INTEREST RAISING GOVERNMENT INTEGRITY CONCERNS

EOIR’s dismissal of noncitizens’ immigration court cases to facilitate their expedited removal is a matter of widespread and exceptional media interest in which there exist possible questions about the government’s integrity which affect public confidence.

Fifty articles on an issue make it a matter of widespread and exceptional public interest. *Citizens for Resp. & Ethics in Wash. v. U.S. DOGE Serv.*, Case No. 25-cv-511 (CRC), 2025 WL 752367, at *13 (D.D.C. Mar. 10, 2025) (hereinafter “CREW”) *see also Brennan Ctr. for Just. v. Dep’t of Com.* 498 F. Supp. 3d 87, 97 (D.D.C. 2020). A “handful of articles” also establishes such interest where the articles are “in a variety of publications” and “repeatedly reference the ongoing national discussion.” *Am. Civ. Liberties Union v. Dep’t of Just.*, 321 F. Supp. 2d 24, 32 (D.D.C. 2004).

Here, state, local, and nationwide media outlets have published at least at least eighty-five articles since May 21, 2025, about ICE asking immigration judges to dismiss noncitizens’

immigration cases so it can pursue these noncitizens' expedited removal.¹ Immigration attorneys also report ICE officials serving pre-signed dismissals based on “non-opposition” to noncitizen

¹ Margaret Kadifa, *ICE Arrests All Adults Without Children at S.F. Immigration Court Today*, Mission Local (July 25, 2025, 1:05 PM), <https://missionlocal.org/2025/07/hed-ice-steps-up-arrests-at-s-f-immigration-court/> (hereinafter, “Kadifa re: Adult Arrests”); Pedro Camacho, *ICE Arrests Migrant Deemed Mentally Impaired by Judge as He Exits Immigration Court: ‘He’s Clearly Not Understanding the Questions’*, The Latin Times (July 25, 2025, 10:36 AM), <https://www.latintimes.com/ice-arrests-migrant-deemed-mentally-impaired-judge-he-exits-immigration-court-hes-clearly-not-587576>; Jordan Salama, *When ICE Agents Are Waiting Outside the Courtroom*, The New Yorker (July 25, 2025), <https://www.newyorker.com/news/the-lede/when-ice-agents-are-waiting-outside-the-courtroom>; Maurice DuBois et al., *3 Immigration Judges Speak Out About Their Firings: ‘It Was Arbitrary, Unfair*, CBS News (July 24, 2025, 8:34 PM), <https://www.cbsnews.com/boston/news/immigration-judges-speak-out-firings-arbitrary-unfair/?intcid=CNM-00-10abd1h>; Danielle James, *ICE Arrests at Check-Ins, Court Hearings Are on the Rise. Michigan Is No Exception*, MLIVE (July 21, 2025, 7:10 AM), <https://www.mlive.com/politics/2025/07/ice-arrests-at-check-ins-court-hearings-are-on-the-rise-michigan-is-no-exception.html>; Margaret Kadifa, *ICE Agents Keep Snatching Asylum Seekers Immediately After Their Court Hearings*, Mother Jones (July 21, 2025), <https://www.motherjones.com/politics/2025/07/ice-agents-arrest-asylum-seekers-after-court-hearings-san-francisco/>; Martha Bellisile et al., *Volunteers Flock to Immigration Courts to Support Migrants Arrested in the Hallways*, ABC News (July 20, 2025, 8:38 AM), <https://abcnews.go.com/US/wireStory/volunteers-flock-immigration-courts-support-migrants-arrested-hallways-123902561>; Mark Rivera et al., *ICE Arrests at Immigration Court in Chicago, Nationwide Labeled ‘Unlawful’ in New LawsUIT*, ABC 7 Chicago (July 18, 2025, 8:36 PM), <https://abc7chicago.com/post/us-immigration-news-ice-arrests-courts-chicago-nationwide-labeled-unlawful-new-lawsuit-trump-administration/17186490/>; Eduardo Cuevas, *‘Escalation:’ Federal Agents Now Detaining People with Active Immigration Cases*, USA Today (July 18, 2025, 11:26 AM), <https://www.usatoday.com/story/news/nation/2025/07/18/migrants-immigration-court-trump-crackdown/84614161007/>; Martha Bellisile, *Homeland Security Officials Defend Immigration Court Arrests After Being Sued*, Associated Press (July 17, 2025, 2:04 PM), <https://apnews.com/article/ice-immigration-court-immigrants-a5190ada4a6019f84d76e62c11c44e30>; Swasti Singhai, *Five Days, 12 Arrests: A Week Inside San Diego Immigration Court*, Times of San Diego (July 17, 2025, 7:41 AM), <https://timesofsandiego.com/politics/2025/07/17/arrests-immigration-court-trump-anxiety-chaos/> (hereinafter, “Singhai re: Week at San Diego Immigration Court”); Devan Cole et al., *Trump Administration Sued Over ICE Arrests at Immigration Courthouses*, CNN (July 16, 2025, 6:23 PM), <https://www.cnn.com/2025/07/16/politics/ice-immigration-courthouse-arrests-lawsuit>; Luis Ferré-Sadurní, *Immigrants File Class-Action Lawsuit to Stop IC Courthouse Arrests*, NY Times (July 16, 2025), <https://www.nytimes.com/2025/07/16/nyregion/trump-ice-arrests-lawsuit-immigrants.html> (hereinafter, “Ferré-Sadurní re: Lawsuit”); Maxine Bernstein, *Federal Judge in Oregon: Homeland Security ‘Tricked’ Asylum Seeker Before Arrest at Immigration Court*, The Oregonian (July 15, 2025, 10:47 AM), <https://www.oregonlive.com/pacific-northwest-news/2025/07/federal-judge-in-oregon-homeland-security-tricked-asylum-seeker-before-arrest-at-immigration-court.html>; Sarah Thamer, *Advocates Denounce ICE Arrests at Fort Snelling Immigration Court*, MPR News (July 15, 2025, 4:00 AM), <https://www.mprnews.org/story/2025/07/15/advocates-protest-ice-arrests-at-immigration-court>; Paige Browning & John O’Brien, *Fears of Arrests Cause Tension at Seattle Immigration Court*, KUOW (July 10, 2025, 5:58 PM), <https://www.kuow.org/stories/fears-of-ice-arrests-cause-tension-at-seattle-immigration-court>; Margaret Kadifa, *ICE Arrests 4 People After Immigration Court Hearings in San Francisco*, Mission Local (July 10, 2025, 12:08 PM), <https://missionlocal.org/2025/07/ice-arrests-four-people-after-they-appear-in-immigration-court/> (hereinafter, “Kadifa re: 4 Arrests”); *What Goes On in America’s Immigration Courts*, Economist (July 10, 2025), <https://www.economist.com/united-states/2025/07/10/what-goes-on-in-americas-immigration-courts>; Francesca Regalado & Soumya Karlamangla, *Tensions Escalate in San Francisco over Immigration Enforcement*, NY Times (July 9, 2025), <https://www.nytimes.com/2025/07/09/us/ice-immigration-protest-san-francisco.html>; Tom Li & Ko Lyn Cheang, *Video: Protestors Cling to Departing ICE Van After Arrest at S.F. Immigration Court*, San Francisco Chronicle (July 8, 2025, 5:34 PM), <https://www.sfchronicle.com/sf/article/protesters-cling-ice->

[van-chaos-immigration-court-20761721.php](#); Nisa Khan, *When ICE Is Waiting at Immigration Court, What Can Advocates Do?*, KQED (July 7, 2025), <https://www.kqed.org/news/12047018/how-legal-experts-advocates-are-responding-to-the-detention-of-asylum-seekers>; Emma Seiwell, *ICE Opposition Grows, With Lawmakers, Attorneys Decrying Courthouse Arrests as a Violation of Due Process*, NY Daily News (July 5, 2025, 6:00 AM), <https://www.nydailynews.com/2025/07/05/ice-opposition-grows-with-lawmakers-attorneys-decrying-courthouse-arrests-a-violation-of-due-process/> (hereinafter “Seiwell re: ICE Opposition Grows”); Jim Vertuno, *Honduran Family Freed From Detention After Lawsuit Against ICE Courthouse Arrests*, Associated Press (July 3, 2025, 6:14 PM), <https://apnews.com/article/ice-family-children-lawsuit-release-ef8d764aebec8ba1b67bafc9080a563d>; Emma Seiwell, *ICE Agents Now Snatching Migrants With Open Court Cases; NY Officials, Lawyers Say It’s ‘Utterly Unlawful’*, NY Daily News (July 3, 2025, 6:50 AM), <https://www.nydailynews.com/2025/07/02/ice-agents-now-snatching-migrants-with-open-court-cases-nyc-officials-lawyers-say-its-utterly-unlawful/> (hereinafter, “Seiwell re: ICE Snatching”); Melissa Gomez, *Faith Leaders Bear Witness as Migrants Make Their Case in Immigration Court*, Los Angeles Times (July 2, 2025, 3:00 AM), <https://www.latimes.com/california/story/2025-07-02/faith-leaders-bear-witness-as-migrants-make-their-case-immigration-court> (hereinafter, “Gomez re: Faith Leaders”); Shelby Bremer, *Lawsuit over San Diego Immigration Court Arrest May Give Insight Into ICE Practices*, NBC San Diego (July 1, 2025, 6:01 PM), <https://www.nbcsandiego.com/news/local/san-diego-lawsuit-ice-courthouse-arrests/3861107/>; Madeleine May & Hannah Marr, *Afghan Ally Detained by ICE After Attending Immigration Court Hearing*, CBS News (July 1, 2025, 1:48 PM), <https://www.cbsnews.com/news/afghan-ally-detained-by-ice-immigration-court/>; Margaret Kadifa, *For One S.F. Asylum Seeker, ICE Arrest Meant Move to More Conservative Judge*, Mission Local (July 1, 2025, 4:00 AM), <https://missionlocal.org/2025/07/sf-asylum-seeker-immigration-judge-ice-arrest/> (hereinafter “Kadifa re: Forum Shopping”); Natali Yahr, *Wisconsin Asylum Seeker Miguel Robles Detained in Unprecedented Wave of Courthouse Arrests*, Racine County Eye (July 1, 2025), <https://racinecountyeve.com/2025/06/30/miguel-robles-immigration-asylum/>; Gwynne Hogan, *He Fled Death Threats for Being Gay, Applied for Asylum and Married a U.S. Citizen. ICE Arrested Him Anyway*, The City (June 30, 2025, 1:41 PM), <https://www.thecity.nyc/2025/06/27/ice-arrested-asylum-gay/> (hereinafter “Hogan re: Mamadou Arrest”); Ko Lyn Cheang, *S.F. Drag Performer Detained by ICE After Asylum Hearing*, San Francisco Chronicle (June 28, 2025), <https://www.sfchronicle.com/sf/article/drag-performer-detained-ice-20399122.php>; Anna-Cat Brigida, *A Legal Trap? Why the Trump Administration is Targeting Immigration Courts for Arrests*, Al Jazeera (June 27, 2025), <https://www.aljazeera.com/news/longform/2025/6/27/why-the-trump-administration-is-targeting-immigration-courts-for-arrests>; Julia Marnin, *6-Year-Old Boy with Leukemia Arrested by ICE is Now Detained in Texas, Suit Says*, Fort Worth Star-Telegram (June 26, 2025, 3:23 PM), <https://www.star-telegram.com/news/state/texas/article309472695.html>; Dan Katz, *ICE Arrested a 6-Year-Old Boy with Leukemia at Immigration Court. His Family is Suing*, Texas Public Radio (June 25, 2025, 11:06 PM), <https://www.tpr.org/border-immigration/2025-06-25/ice-arrested-a-6-year-old-boy-with-leukemia-at-immigration-court-his-family-is-suing>; Nina Shapiro, *As Pushback Grows to WA Immigration Court Arrests, ICE Changes Tactics*, The Seattle Times (June 24, 2025, 6:00 AM), <https://www.seattletimes.com/seattle-news/as-pushback-grows-to-wa-immigration-court-arrests-ice-changes-tactics/> (hereinafter “Shapiro re: ICE Tactic Change”); Kate Morrissey, *Here’s What’s Happening to the People ICE Arrests in Immigration Court*, Capital & Main (June 24, 2025), <https://capitalandmain.com/heres-whats-happening-to-the-people-ice-arrests-in-immigration-court>; Elizabeth L.T. Moore & Elizabeth Zavala, *Obscure San Antonio Court Becomes Flashpoint in Immigration Debate*, San Antonio Express-News (June 23, 2025), <https://www.expressnews.com/news/article/obscure-san-antonio-immigration-court-spotlight-20381608.php>; Luis Ferré-Sadurní, *Brad Lander Tried to Escort Immigrants facing Arrest. He’s Not Alone*, NY Times (June 19, 2025), <https://www.nytimes.com/2025/06/19/nyregion/ice-immigrants-volunteer-escorts-courthouse.html> (hereinafter “Ferré-Sadurní re: Lander Escort”); Lily Celeste, *ICE Detains Three People Attending Their Immigration Hearings in Harlingen*, KRGV.Com (June 15, 2025, 6:40 PM), <https://www.krgv.com/news/ice-detains-three-people-outside-harlingen-immigration-court/>; Ryan Oehrli, *‘Rigged’? ICE Agents Are Arresting People at Charlotte’s Immigration Court*, The Charlotte Observer (June 12, 2025, 11:31 AM), <https://www.charlotteobserver.com/news/local/crime/article308209165.html>; Armando Garcia, *Immigrant Rights Group Say ICE Officers ‘Ambush Noncitizens’ in Courthouse Arrests, Ask Judge to Intervene*, ABC News (June 12, 2025, 10:32 AM), <https://abcnews.go.com/US/immigrant-rights-groups-ice-officers-ambush-noncitizens->

[courthouse/story?id=122770040](#); Thomas Lyons, *Mood is Tense at Concord Immigration Court Following ICE Arrests*, BerkeleySide (June 12, 2025, 9:55 AM), <https://www.berkeleyside.org/2025/06/12/concord-immigration-court-tension-after-ice-arrests>; Ximena Bustillo, *ICE's Novel Strategy Allows for More Arrests from Inside Immigration Courts*, NPR (June 12, 2025, 5:02 AM), <https://www.npr.org/2025/06/12/nx-s1-5409403/trump-immigration-courts-arrests>; Luis Ferré-Sadurní, *Inside a Courthouse, Chaos and Tears as Trump Accelerates Deportations*, NY Times (June 12, 2025), <https://www.nytimes.com/2025/06/12/nyregion/immigration-courthouse-arrests-trump-deportation.html> (hereinafter “Ferré-Sadurní re: Inside NYC Immigr. Cts.”); Martha Bellisile et al., *Immigration Officers Intensify Arrests in Courthouse Hallways on a Fast Track to Deportation*, Associated Press (June 11, 2025, 4:17 PM), <https://apnews.com/article/immigration-court-arrests-ice-deportation-99d822cdc93ae7dc26026c27895d5ea1>; Brittany Taylor et al., *Second Day of Arrests by ICE Agents at Immigration Court in Southwest Houston*, Click 2 Houston.com (June 11, 2025, 10:25 AM), <https://www.click2houston.com/news/local/2025/06/11/ice-agents-stationed-outside-immigration-court-in-houstons-greenspoint-area/>; Julia Ainsely, *Trump Admin Tells Immigration Judges to Dismiss Cases in Tactic to Speed Up Arrests*, NBC News (June 11, 2025, 5:00AM), <https://www.nbcnews.com/politics/national-security/trump-admin-tells-immigration-judges-dismiss-cases-tactic-speed-arrest-rcna212138>; Conrad Wilson, *ICE Arrests 2 More Asylum Seekers at Immigration Court in Portland*, OPB (June 10, 2025, 5:12 PM), <https://www.opb.org/article/2025/06/10/ice-arrests-2-more-asylum-seekers-at-immigration-court-in-portland/> (hereinafter, “Wilson re: Two Arrests”); Ninfa Saavedra & Robert Arnold, *ICE Arrests Multiple People at Houston's Immigration Court*, Click2Houston.com (June 10, 2025, 2:48 PM), <https://www.click2houston.com/news/local/2025/06/10/ice-arrests-reportedly-underway-at-houstons-immigration-court/>; Natalie Weber, *ICE Detains Multiple Men at Houston Immigration Courthouse, Civil Rights Organization Says*, Houston Public Media (June 10, 2025, 11:58 AM), <https://www.houstonpublicmedia.org/articles/news/politics/immigration/2025/06/10/523600/ice-detains-multiple-men-at-houston-immigration-courthouse/>; Giulia McDonnell Nieto del Rio, *This Is What An ICE Arrest in Boston Immigration Court Looks Like*, Boston Globe (June 9, 2025, 6:31 AM), <https://www.bostonglobe.com/2025/06/09/metro/ice-arrests-at-boston-immigration-court/> (hereinafter, “Nieto del Rio re: Inside Boston Immigr. Ct. Arrest”); Audrey Conklin & Bill Melugin, *Trump's ICE Launches Bold Courthouse Migrant Arrest Strategy to Fast-Track Deportations Biden Avoided*, Fox News (June 9, 2025, 4:00 AM), <https://www.foxnews.com/us/trumps-ice-launches-bold-courthouse-migrant-arrest-strategy-fast-track-deportations-biden-avoided?msocid=1cd283b1756f61231883976574c46057>; Conrad Wilson, *ICE Detains Another Asylum-Seeker Outside Portland Courtroom, Legal Petition Says*, OPB (June 6, 2025, 9:30 AM), <https://www.opb.org/article/2025/06/06/asylum-arrest-portland-yzlh/> (hereinafter, “Wilson re: Arrest”); Amy Larson, *Newlywed Couple Separated at Immigration Courthouse by ICE*, The Hill (June 5, 2025, 1:14 PM), <https://thehill.com/homenews/state-watch/5334753-immigration-courthouse-ice-trump-dhs/>; Laura Romero et al., *In a New Tactic, ICE Is Arresting Migrants at Immigration Courts, Attorneys Say*, ABC News (June 4, 2025, 6:37 PM), <https://abcnews.go.com/US/new-tactic-ice-arresting-migrants-immigration-courts-attorneys/story?id=122513021>; Julie Carey, *Cancel, Arrest, Deport: Immigration Lawyer Warns of Emerging ICE Tactic*, 4 Washington (June 4, 2025, 3:01 PM), <https://www.nbcwashington.com/news/local/cancel-arrest-deport-immigration-lawyer-warns-of-emerging-ice-tactic/3927509/>; Brad Schmidt, *Immigration Arrest at Courthouse Marks First for Portland*, The Oregonian (June 3, 2025, 3:22 PM), <https://www.oregonlive.com/politics/2025/06/immigration-arrest-at-courthouse-marks-first-for-portland.html>; Stephen Franklin & Katema Hosseini, *ICE Target Noncitizens As Cases Dismissed in Immigration Court in Chicago*, Borderless (June 3, 2025), <https://borderlessmag.org/2025/06/03/ice-arrests-chicago-immigration-court-trump-detention-immigration-custom-enforcement/>; Conrad Wilson, *ICE Detains Asylum Seeker Outside Portland Immigration Court, Lawyers Say*, OPB (June 2, 2025, 11:01 PM), <https://www.opb.org/article/2025/06/02/ice-immigration-enforcement-detains-asylum-seeker-portland-court/>; Angélica Franganillo Díaz & Priscilla Alvarez, *ICE Targets Migrants for Arrest at Courthouses as Trump Administration Intensifies Deportation Push*, CNN (June 2, 2025, 5:00 AM), <https://www.cnn.com/2025/06/02/politics/ice-arrests-migrants-courthouse>; Shelly Bradbury, *Feds Detain Immigrant Family at Denver Courthouse Amid New Trump Strategy*, Denver Post (May 30, 2025, 3:32 PM), <https://www.denverpost.com/2025/05/30/denver-immigration-arrest-courthouse-ice-trump/>; Giulia McDonnell Nieto del Rio, *ICE Arrests at Massachusetts Immigration Courts Target*

Immigrants Seeking Permission to Stay in US, Boston Globe (May 30, 2025, 1:39PM), <https://www.bostonglobe.com/2025/05/27/metro/immigration-courts-ice-arrests-massachusetts> (hereinafter, “Nieto del Rio re: Boston Immigr. Ct. Arrests”); Suzanne Gamboa, *Immigration Arrests in Courthouses Have Become the New Deportation Tool, Stripping Migrants of a Legal Process*, NBC News (May 30, 2025, 5:00 AM), <https://www.nbcnews.com/news/latino/immigrations-arrests-ice-deportations-courthouse-legal-process-ice-rcna209671>; Hamed Aleaziz et al., *How ICE is Seeking to Ramp Up Deportations Through Courthouse Arrests*, NY Times (May 30, 2025), <https://www.nytimes.com/2025/05/30/us/politics/ice-courthouse-arrests.html>; Allison Sherry, *Signaling a Policy Shift, ICE Detains a Family Who Showed Up at Denver Immigration Court for a Check-In*, CPR News (May 29, 2025, 1:35 PM), <https://www.cpr.org/2025/05/29/ice-detains-family-denver-immigration-court/>; Daniel Gonzalez & Richard Ruelas, *After Short Break, ICE Resumes Arrests at Phoenix Immigration Court, Changes Keep Tactic*, AZ Central (May 29, 2025, 5:01 AM), <https://www.azcentral.com/story/news/politics/immigration/2025/05/29/phoenix-immigration-court-ice-arrests-resume/83767918007/>; David Noriega, *Immigration Courts Are Dismissing Cases of Those Sent to El Salvador, Potentially Cutting Off Their Return*, NBC News (May 28, 2025, 5:10 PM), <https://www.nbcnews.com/news/latino/immigration-courts-alien-enemies-deportation-andry-hernandez-romero-rcna209402>; Gwynne Hogan, *Migrants, Protestors, and a Pastor Arrested Inside and Outside Manhattan Immigration Courthouses*, The City (May 28, 2025, 3:16 PM), <https://www.thecity.nyc/2025/05/28/ice-arrests-migrants-26-federal-plaza-pastor/> (hereinafter, “Hogan re: NYC Immigr. Ct. Arrests”); Tomoki Chien, *Undercover ICE Agents Begin Making Arrests at SF Immigration Court*, The San Francisco Standard (May 27, 2025, 5:32 PM), <https://sfstandard.com/2025/05/27/undercover-ice-agents-make-arrests-san-francisco-court/>; Michael Elsen-Rooney, *A Bronx High Schooler Showed Up for a Routine Immigration Court Date. ICE Was Waiting*, Chalkbeat New York (May 26, 2025, 8:35 pm), <https://www.chalkbeat.org/newyork/2025/05/27/bronx-high-school-student-detained-by-immigration-ice-agents/?ref=hellgatenyc.com> (hereinafter, “Elsen-Rooney re: Dylan Arrest”); Milena Malaver et al., *ICE Agents in Miami Find New Spot to Carry Out Arrests: Immigration Court*, Miami Herald (May 26, 2025, 1:27 PM), <https://www.miamiherald.com/news/local/immigration/article306900486.html>; Melissa Gomez, *Father Ripped from Family as Agents Target Immigration Courts, Arresting People After Cases Dismissed*, LA Times (May 24, 2025, 10:00AM), <https://www.latimes.com/california/story/2025-05-24/ice-agents-swarm-immigration-courts-arresting-people-after-cases-dismissed> (hereinafter, “Gomez re: Immigr. Ct. Arrests”); Tyche Hendriks, *‘Unprecedented’: ICE Officers Operating Inside Bay Area Immigration Courts, Lawyers Say*, KQED (May 24, 2025), <https://www.kqed.org/news/12041473/unprecedented-ice-officers-operating-inside-bay-area-immigration-courts-lawyers-say>; Camilo Montoya-Galvez & Nidia Cavazos, *ICE Ending Migrants’ Court Cases In Order to Arrest and Move to Deport Them*, CBS News (May 23, 2025, 9:53 AM), <https://www.cbsnews.com/news/ice-ending-migrants-court-cases-arrest-move-to-deport-them/>; Arelis R. Hernández & Maria Sacchetti, *Immigrant Arrests at Courthouses Signal New Tactic in Trump’s Deportation Push*, Washington Post (May 23, 2025), <https://www.washingtonpost.com/immigration/2025/05/23/immigration-court-arrests-ice-trump/>; Trevor Hughes, *ICE Agents Deploy New Tactic: Arresting People As They Leave Mandatory Court Hearings*, USA Today (May 22, 2025, 1:13 PM), <https://www.usatoday.com/story/news/nation/2025/05/22/ice-arrests-immigration-court-deportation-tactics/83792357007/>; Joshua Goodman et al., *They Came to Hearing at Chicago’s Immigration Court, Then Got Arrested*, Chicago Sun-Times (May 22, 2025, 3:59PM), <https://chicago.suntimes.com/immigration/2025/05/22/ice-agents-hallways-immigration-court-trump-mass-arrest>; Anders Hagstrom & Bill Melugin, *ICE Begins New, Nationwide Effort to Arrest Illegal Aliens at Immigration Hearings* (May 22, 2025, 1:07 PM), <https://www.foxnews.com/politics/ice-begins-new-nationwide-effort-arrest-illegal-aliens-immigration-hearings>; Joshua Goodman & Gisela Salomon, *ICE Agents Wait in Hallways of Immigration Court as Trump Seeks to Deliver on Mass Arrest Pledge*, Associated Press (May 22, 2025, 1:30 AM), <https://apnews.com/article/immigration-courts-arrests-trump-ice-deportations-fa96435d4ec021cc8ff636b23d80d848>; J. Dale Shoemaker, *ICE Raids Immigration Court in Buffalo*, Investigative Post (May 22, 2025), <https://www.investigativepost.org/2025/05/22/ice-raids-immigration-court-in-buffalo/>; Raphael Romero Ruiz et al., *For 2nd Day, People Attending Phoenix Immigration Hearings Arrested by ICE*, USA Today (May 21, 2025, 11:42 PM), <https://www.usatoday.com/story/news/politics/immigration/2025/05/21/ice-arrests-phoenix-immigration-court/83772323007/?gnt-cfr=1&gca-cat=p>; Gustavo Sagero Álvarez, *ICE Agents at Seattle Courthouse*

respondents at immigration courts without respondents not having notice of ICE’s motion to dismiss their immigration case and an opportunity to oppose it. Much of the coverage on these dismissals casts doubt on their integrity, describing them as a violation of due process and a tactic to deport noncitizens without hearings.² Some coverage even suggests that EOIR is firing immigration judges for refusing to dismiss cases.³

Dismissals at immigration courts and the ICE arrests that follow them have outraged Americans around the country. Opposition to these actions and doubts about their legality have prompted mass protests at immigration courts in New York, Seattle, San Francisco, and elsewhere.⁴ It has

Arrest People Whose Deportation Hearings are Dismissed, KUOW (May 21, 5:45 PM), <https://www.kuow.org/stories/ice-agents-at-seattle-courthouse-arrest-people-whose-deportation-hearings-are-dismissed>; Akela Lacy et al. *ICE Agents Are Camped Outside Immigration Courts to Make Arrests*, The Intercept (May 21, 2025, 3:27 PM), <https://theintercept.com/2025/05/21/ice-agents-courts-arrests-immigrants-deport/>; Paul Ingram, ‘Mayhem’ As ICE Officials Arrest Multiple People at Immigration Court in Phoenix, AZ Mirror (May 21, 2025, 11:12 AM), <https://azmirror.com/2025/05/21/mayhem-as-ice-officials-arrest-multiple-people-at-immigration-court-in-phoenix/>; Nina Shapiro, *ICE Arrests at WA Immigration Court Spark Fear of Fast-Track Removal*, Seattle Times (May 21, 2025, 6:00 AM), <https://www.seattletimes.com/seattle-news/law-justice/ice-arrests-at-wa-immigration-court-spark-fear-of-fast-track-removal/> (hereinafter, “Shapiro re: ICE Arrests”).

² Kadifa re: Adult Arrests, *supra* n. 1; Camacho, *supra* n. 1; Salama, *supra* n. 1; James, *supra* n. 1; Cole et al., *supra* n. 1; Ferré-Sadurní re: Lawsuit, *supra* n. 1; Cuevas, *supra* n. 1; Bernstein, *supra* n. 1; Browning & O’Brien, *supra* n. 1; Kadifa re: 4 Arrests, *supra* n. 1; Li & Cheang, *supra* n. 1; Khan, *supra* n. 1; Kadifa re: Forum Shopping, *supra* n. 1; Yahr, *supra* n. 1; Hogan re: Mamadou Arrest, *supra* n.2; Cheang, *supra* n. 1; Brigida, *supra* n. 1; Moore & Zavala, *supra* n. 1; Lyons, *supra* n. 1; Oehrli, *supra* n. 1; Garcia, *supra* n. 1; Bustillo, *supra* n. 1; Ferré-Sadurní re: Inside NYC Immigr. Cts., *supra* n. 1; Bellisile et al. re: Immigration Officers Intensify Arrests, *supra* n. 1; Wilson re: Two Arrests, *supra* n. 1; Saavedra & Arnold, *supra* n. 1; Nieto del Rio re: Inside Boston Immigr. Ct. Arrest, *supra* n. 1; Conklin & Melugin, *supra* n. 1; Wilson re: Arrest, *supra* n. 1; Romero et al., *supra* n. 1; Carey, *supra* n. 1; Franklin & Hosseini, *supra* n. 1; Bradbury, *supra* n. 1; Nieto del Rio re: Boston Immigr. Ct. Arrests, *supra* n. 1; Gamboa, *supra* n. 1; Aleaziz et al., *supra* n. 1; Chien, *supra* n. 1; Elsen-Rooney re: Dylan Arrest, *supra* n. 1; Malaver et al., *supra* n. 1; Gomez re: Immigr. Ct. Arrests, *supra* n. 1; Hernández & Sacchetti, *supra* n. 1; Hughes, *supra* n. 1; Ruiz et al, *supra* n. 1; Lacy et al, *supra* n. 1; Shapiro re: ICE Arrests, *supra* n. 1; Seiwel re: ICE Snatching, *supra* n. 1; Hendricks, *supra* n. 1; Seiwel re: ICE Opposition Grows, *supra* n. 1.

³ Dubois et al., *supra* n. 1.

⁴ Thamer, *supra* n. 1; Browning & O’Brien, *supra* n. 1; Alicia Victoria Lozano, *Violent Clashes at San Francisco Immigration Court Won’t Deter Protestors, Organizers Say*, NBC News (July 10, 2025, 4:43 PM), <https://www.nbcnews.com/news/us-news/violent-clashes-san-francisco-immigration-court-wont-deter-protesters-rcna218059>; Sarah Rumpf-Whitten, *Watch: ICE Agents Fight Off Masked Mob Outside Blue City Immigration Court*, FOX News (July 10, 2025, 1:12 PM), <https://www.foxnews.com/us/watch-ice-agents-fight-off-masked-mob-outside-blue-city-immigration-court>; Shay Arthur, *Crowd Gathers for Immigration Rally at Memphis Court*, WREG Memphis (July 8, 2025, 12:07 PM), <https://wreg.com/news/local/crowd-gathers-for-immigration-rally-at-memphis-court/>; Regalado & Karlamangla, *supra* n. 1; Li & Cheang, *supra* n. 1; Khan, *supra* n. 1; Stephania Jimenez, *PSL San Antonio Organizes Event to Educate Community on Immigration Laws Amid Rising IDE Deportations*, KSAT (July 1, 2025, 10:42 PM), <https://www.ksat.com/news/local/2025/07/02/psl-san-antonio-organizes-event-to-educate-community-on-immigration-laws-amid-rising-ice-deportations/>; May & Marr, *supra* n. 2; Nina Shapiro, *As Pushback Grows to WA Immigration Court Arrests, ICE Changes Tactics*, The Seattle Times (June 24, 2025, 6:00 AM), <https://www.seattletimes.com/seattle-news/as-pushback-grows-to-wa-immigration-court-arrests-ice-changes-tactics/>; Luis Ferré-Sadurní, *Brad Lander is Arrested by ICE Agents at Immigration Courthouse*, NY Times (June 17, 2025), <https://www.nytimes.com/2025/06/17/nyregion/brad-lander-immigration-ice.html>; Moore & Zavala, *supra* n.

also prompted clergy, political leaders, and other members of the public to accompany noncitizens to their immigration court dates to document dismissals and arrests, attempt to stop the latter, and help arrestees inform their families.⁵

Responsive records will address critical integrity questions left open by existing media coverage. Such records will show the number of cases ICE has moved to dismiss since the start of May 1, 2025, the percentage of dismissals that immigration judges have granted, and any variances in these statistics by immigration court.

1; Stephen Hobbs, *In Sacramento's Immigration Court, ICE Detention Threats Leave Residents in Limbo*, The Sacramento Bee (June 14, 2025, 10:05 AM), <https://www.sacbee.com/news/politics-government/capitol-alert/article308346910.html>; Greg Micek et al., *Sacramento Immigration Court on Lockdown, Draws Protest After Suspected ICE Operation*, Capradio (June 12, 2025), <https://www.capradio.org/articles/2025/06/12/sacramento-immigration-court-on-lockdown-draws-protest-after-suspected-ice-operation/>; Lyons, *supra* n. 1; Ferré-Sadurní re: Inside NYC Immigr. Cts., *supra* n. 1; Bellisile et al. re: Immigration Officers Intensify Arrests, *supra* n. 1; Priscilla Alvarez, *ICE Protest Nationwide Comes As Agency Scrambles to Meet Trump's Immigration Arrest Quotas*, CNN (June 10, 2025, 10:16 PM), <https://www.cnn.com/2025/06/10/politics/ice-scrambles-immigration-arrest-quotas>; George Kelly & Max Harrison-Caldwell, *Protesters Shut Down Immigration Court After ICE Arrests*, The San Francisco Standard (June 10, 2025, 1:00 PM), <https://sfstandard.com/2025/06/10/protesters-surround-immigration-court-after-ice-arrests/>; Weber, *supra* n. 1; Joe Rivano Barros et al., *S.F. Police Arrest Dozens in 2nd Night of Protests Against ICE*, Mission Local (June 9, 2025, 8:16 PM), <https://missionlocal.org/2025/06/sf-mission-march-mobilized-thousands-against-ice/>; Aleaziz et al., *supra* n. 1; Hogan re: NYC Immigr. Ct. Arrests, *supra* n. 1; Ruiz et al, *supra* n. 1.

⁵ Salama, *supra* n. 1; Bellisile et al. re: Volunteers Flock to Immigration Courts, *supra* n. 1; Ferré-Sadurní re: Lawsuit, *supra* n. 1; Thamer, *supra* n. 1; Brian Strassburger, S.J. & William Critchley-Menor, S.J., *What We Saw During An ICE Arrest & Immigration Court Hearing: The Breakdown of Justice in America*, America: The Jesuit Review (July 11, 2025), <https://www.americamagazine.org/politics-society/2025/07/11/ice-immigration-court-deportation-injustice-251119>; Ciara Encinas, *Volunteers Describe How They Document ICE Arrests in Immigration Courts*, Fox 5 (July 11, 2025, 4:55 PM), <https://fox5sandiego.com/news/local-news/san-diego/san-diego-court-ice-arrests/>; Moore & Zavala, *supra* n. 1; Joey Safchik, *ICE Handcuffs 71-Year-Old Grandmother, a US Citizen, at San Diego Immigration Court*, 7 San Diego (July 9, 2025, 7:06 PM), <https://www.nbcсандiego.com/news/local/ice-arrests-71-year-old-grandmother-a-us-citizen-at-san-diego-immigration-court/3865098/>; Khan, *supra* n. 1; Swasti Singhai, *San Diego Volunteers Bear Witness Daily as ICE Continues Courtroom Arrests*, Times of San Diego (July 3, 2025, 3:41 PM), <https://timesofsandiego.com/life/2025/07/03/san-diego-community-bears-witness-as-ice-continues-courtroom-arrests/>; Gomez re: Faith Leaders, *supra* n. 1; Shapiro re: ICE Tactic Change, *supra* n. 1; Ray Sanchez & Allsha Ebrahimji, *Masked Ice Officers: The New Calling Card of The Trump Administration's Crackdown*, CNN (June 21, 2025), <https://www.cnn.com/us/ice-immigration-officers-face-masks>; Ferré-Sadurní re: Lander Escort, *supra* n. 1; Micek et al, *supra* n. 1. Ken Stone, *ICE Agents Scatter As SD Bishop Pham, Other Clergy Visit Immigration Court*, Times of San Diego (June 20, 2025, 3:04 PM), <https://timesofsandiego.com/life/2025/06/20/ice-agents-scatter-as-sd-bishop-pham-other-clergy-visit-immigration-court/>; Stephen Hobbs, *In Sacramento's Immigration Court, ICE Detention Threats Leave Residents in Limbo*, The Sacramento Bee (June 14, 2025, 10:05 AM), <https://www.sacbee.com/news/politics-government/capitol-alert/article308346910.html>; Carolina Estrada, *Two Men Detained by ICE After Sacramento Immigration Court Hearings*, KCRA3 (June 11, 2025, 11:13 PM), <https://www.kcra.com/article/two-men-detained-by-ice-sacramento-immigration-hearings/65041264>.

B. URGENCY TO INFORM THE PUBLIC ABOUT FEDERAL GOVERNMENT ACTIVITY BY A REQUESTER

Additionally, and alternatively, the Council has a compelling need for the records sought. It is primarily engaged in disseminating information. And urgency also exists to inform the public about the number of cases ICE has moved to dismiss since the start of May 1, 2025, the percentage of dismissals that immigration judges have granted, and any variances in these statistics by immigration court.

1. *The Council Primarily Engages in Information Dissemination*

The Council primarily engages in disseminating information and analysis on immigration and other issues. Organizations primarily engaged in information dissemination include not only “media organizations and newspapers,” *Heritage Found. v. Entl. Prot. Agency*, Civil Action No. 23-748, 2023 WL 2954418, *3 (D.D.C. 2023), but also “non-partisan law and public policy group[s]” like Requesters that “regularly write[], publish[], and disseminat[e], information online,” *Brennan Ctr. for Just.*, 498 F. Supp. 3d at 98 (Brennan Center); *see also Ctr. for Pub. Integrity v. U.S. Dep’t of Def.*, 411 F. Supp. 3d 5 (D.D.C. 2019) (Center for Public Integrity); *Protect Dem. Proj. v. U.S. Dep’t of Def.*, 263 F. Supp. 3d 293, 298 (D.D.C. 2017) (Protect Democracy Project); *Am. Civil Liberties Union*, 321 F. Supp. 2d at 29 n.5 (Electronic Privacy Information Center (“EPIC”)).

Like Brennan Center, Protect Democracy Project, EPIC, and Center for Public Integrity, the Council authors factsheets and special reports on proposed and actual immigration policies, some of which shape media coverage in outlets across the nation.⁶ It also analyzes immigration data and other government records—including those obtained through FOIA requests like this one—in interactive web reports.⁷ And it circulates its reports and factsheets through its website,⁸

⁶ *See, e.g., Trump-Backed Mass Deportations Would Cost Billions, Report Says*, CBS News (Oct. 3, 2024), <https://www.cbsnews.com/video/trump-backed-mass-deportations-would-cost-billions-report/> (discussing Am. Immigr. Council, *Mass Deportation: Devastating Costs to America, Its Budget and Economy* (Oct. 2, 2024), <https://www.americanimmigrationcouncil.org/report/mass-deportation/>); Emma Goldberg, *What if Trump Deported Millions of Immigrants*, The New York Times (Oct. 22, 2024), https://www.nytimes.com/interactive/2024/10/22/us/elections/trump-deportation.html?unlocked_article_code=1.Uk4.Pjao.990iYFTTpEl6 (same); *What Trump’s Mass Deportation Plan Might Look Like If He Wins the Election*, 60 Minutes (Oct. 27, 2024), <https://www.youtube.com/watch?v=WjCHjwSMFI> (same); *Mass Deportations*, Last Week Tonight (Oct. 27, 2024), <https://www.youtube.com/watch?v=0UEhMDAIX1Y> (same); *The Costs of Mass Deportation? Expert Breaks Down Trump’s Immigration Plan*, Amanpour & Company, (Oct. 28, 2024), <https://www.youtube.com/watch?v=Dmfo3atidKE> (same).

⁷ *See* Am. Immigr. Council, *Torrance County Detention Facility: Troubling Role in Detaining Haitian Migrants During the 2021 Del Rio Incident* (2024), <https://www.americanimmigrationcouncil.org/foia/torrance-detention-facility/>; Am. Immigr. Council, *Ohio, We Have a Problem: Border Patrol & Local Law Enforcement’s Patterns & Tactics of Abuse in Ohio’s Immigration Enforcement* (2024), <https://www.americanimmigrationcouncil.org/foia/ohio-border-patrol-abuse/>; Am. Immigr. Council, *Refugee Resettlement in U.S. Cities* (2019), https://data.americanimmigrationcouncil.org/en/refugee-resettlement-us/#exploratory_tool

⁸ The Council’s website received 4,506,460 views from 2,952,034 different users in 2024.

blog, email newsletters, and an X (formerly known as Twitter) account with 64.9 thousand followers.⁹

2. Urgency Exists to Inform the Public

Urgency also exists to inform the public about the number of cases ICE has moved to dismiss since the start of May 1, 2025, the percentage of dismissals that immigration judges have granted, and any variances in these statistics by immigration court.

Requisite urgency exists where “the request touches on ‘a matter of current exigency to the American public’” and delay “compromises a significant recognized interest.” *Protect Dem. Proj.*, 263 F. Supp. 3d 293 at 299 (quoting *Al-Fayed v. CIA*, 254 F.3d 300, 310 (D.C. Cir. 2001)). Dismissal of immigration court cases to facilitate expedited removal is exigent to the American public, as demonstrated by the eighty plus articles cited in this request and protests inside and outside of immigration courts around the country. See *CREW*, 2025 WL 752367, at *13 (finding urgency to inform the public based on at least fifty articles on the issue); *Am. Civil Liberties Union of No. Cal. v. U.S. Dep’t of Def.*, No. C 06-01698, 2006 WL 1469418, at *6 (N.D. Cal. May 25, 2006) (same); 28 C.F.R. § 16.5(e)(3) (“The existence of numerous articles published on a given subject can be helpful to establishing the requirement that there be an ‘urgency to inform’ the public on the topic.”).

Delayed production of the requested data would compromise the ongoing public debate about the propriety of such dismissals. Cf. *CREW*, 2025 WL 752367, at *13 (expediting a request for records about the U.S. DOGE Service); *Protect Dem. Proj.*, 263 F. Supp. 3d 293 at 299 (expediting a request for records about a possible unlawful airstrike on Syria); *Am. Civil Liberties Union of N. Cal. v. U.S. Dep’t of Def.*, No. C. 06-01698, 2006 WL 1469418, at *6-7 (N.D. Cal. May 25, 2006) (expediting a request for records about possible unlawful military surveillance of protestors); *Freedom Coalition of Doctors for Choice v. Ctrs. For Disease Control & Prevention*, 2:23-cv-102, 2024 WL 69084, at *14 (N.D. Tex. Jan. 5, 2024) (expediting a request disputing the effectiveness of COVID-19 vaccines).

IV. FEE WAIVER REQUEST

Requestors seek a fee waiver since “disclosure of the requested records is in the public interest.” 5 U.S.C. § 552(a)(4)(A)(iii). EOIR must construe “the FOIA fee waiver provision . . . liberally . . . in favor of waivers for noncommercial requesters” like Requesters. *Schoenman v. FBI*, 604 F. Supp. 2d 174, 188 (D.D.C. 2009). Disclosure is in the public interest where it (A) “is likely to contribute significantly to public understanding of the operations or activities of the government” and (B) “is not primarily in the commercial interest of the [R]equesters.” 5 U.S.C. § 552(a)(4)(A)(iii); see also 28 C.F.R. § 16.10(k)(1). Requesters satisfy both requirements.

⁹ See <https://x.com/immcouncil>.

A. DISCLOSURE OF THE INFORMATION IS IN THE PUBLIC INTEREST

Disclosing the requested records is likely to contribute significantly to the public's understanding of EOIR's dismissal of immigration court cases and the extent to which dismissal remains a matter of discretion for immigration judges to consider on a case-by-case basis.

EOIR must consider two factors when assessing a disclosure's contribution to public understanding of a government activity or operation, see 28 C.F.R. § 16.10(k)(2): (i) whether the request has a "direct and clear" rather than "remote or attenuated" connection to "identifiable operations or activities of the federal government"; and (ii) whether disclosure "would be likely to contribute significantly to public understanding of those operations or activities." *Id.* § 16.10(k)(2)(i)-(ii). Each factor supports a fee waiver here.

1. *Request Has a Direct and Clear Connection to Government Operations or Activities*

First, this request has a direct and clear relation to the following governmental operations and activities: EOIR's dismissal or termination of immigration court proceedings so ICE can seek noncitizens' expedited removal.

2. *Records Sought Will Contribute Significantly to Public Understanding of the Above*

Second, disclosing the records sought will "contribute significantly to public understanding of" the above activities. *Id.* § 16.10(k)(2)(ii). Such contribution exists where "[d]isclosure of the requested information [is] meaningfully informative about [these] activities" and "contribute[s] to the understanding of a reasonably broad audience of persons interested in the subject, as opposed to the individual understanding of the requester." *Id.* 16.10(k)(2)(ii)(A)-(B). Both criteria are satisfied here.

i. DISCLOSURE OF RECORDS IS MEANINGFULLY INFORMATIVE

Disclosing requested records will be meaningfully informative about EOIR's dismissal or termination of immigration court proceedings so ICE can seek expedited removal of respondent noncitizens. Disclosure is meaningfully informative where disclosed information is not "in the public domain, in either the same or a substantially identical form." *Id.* § 16.10(k)(2)(ii)(A).

Here, as demonstrated by the media coverage cited above, the public only knows that ICE is arresting noncitizens at or near immigration courts after moving to dismiss their immigration cases and that immigration judges are granting many dismissals, thereby allowing ICE to pursue expedited removal.¹⁰ Public knowledge does not extend the number of cases ICE has moved to dismiss since the start of May 1, 2025, the percentage of dismissals that immigration judges have granted, and any variances in these statistics by immigration court. Requested records are therefore "meaningfully informative" about each of these activities.

¹⁰ See generally Media articles cited in footnotes 1-5.

ii. DISCLOSURE OF RECORDS CONTRIBUTES TO UNDERSTANDING OF A REASONABLY BROAD AUDIENCE

Disclosing requested records will contribute to the understanding of a reasonably broad audience of persons interested in EOIR’s dismissal or termination of immigration court proceedings so ICE can seek respondent noncitizens’ expedited removal.

Requesters presumably satisfy this consideration as representatives of the news media. *Id.* § 16.10(k)(2)(ii)(B). They both “gather[] information of potential interest to a segment of the public, use[] [their] editorial skills to turn the raw materials into a distinct work, and distribute[] that work to an audience.” *Id.* § 16.10(b)(6); *see also Serv. Women’s Action Network v. Dep’t of Def.*, 888 F. Supp. 2d 282, 287-88 (D. Conn. 2012) (finding that ACLU is a news media representative); *cf. Elec. Privacy Info. Ctr. v. Dep’t of Def.*, 241 F. Supp. 2d 5, 10-15 (D.D.C. 2003) (finding that an organization similar to the Council is a news media representative).

Additionally, and alternatively, the ongoing and extensive media coverage in nationwide, state, and local outlets about dismissals of immigration proceedings demonstrates interest in this subject by a reasonably broad audience. Requesters intend and are well-equipped to inform this audience about the information contained in responsive records, as they are experts in educating the public about immigration issues.

As detailed further in the expedited processing section, the Council analyzes government records—including those obtained through FOIA requests like this one—in interactive web reports and other publications available for free on its website.¹¹ And it circulates these publications for free through its website,¹² blog, email newsletters, and an X account with 64.9 thousand followers. It intends to publish content about records obtained from this request on its website and otherwise disseminate that content to its readers and the larger public.

Similarly, LatinoJustice PRLDEF produces newsletters, blogs, reports, opinion, editorials, and video interviews about the constitutional rights and equal protection of Latinos, immigrants, and other marginalized communities.¹³ And it circulates these publications through its social media accounts. All of its materials are free and available to the public on its website.

¹¹ *See, e.g.,* Torrance County Detention Facility: Troubling Role in Detaining Haitian Migrants During the 2021 Del Rio Incident, *supra* n. 7; Ohio, We Have a Problem: Border Patrol & Local Law Enforcement’s Patterns & Tactics of Abuse in Ohio’s Immigration Enforcement, *supra* n. 7; Refugee Resettlement in U.S. Cities, *supra* n. 7.

¹² The Council’s website received 4,506,460 views from 2,952,034 different users in 2024.

¹³ *See, e.g.,* LatinoJustice PRLDEF, 100 Days Later: The Harm So Far to Latinx Communities (April 2025), <https://www.latinjustice.org/en/pressreport/100-days-later-harm-so-far-latinx-communities>; LatinoJustice PRLDEF, A Promise to Harm: What’s at Stake for the Latino Community in Project 2025 (Oct. 2024), <https://www.latinjustice.org/en/pressreport/promise-harm-whats-stake-latinx-community-project-2025>;

In sum, Requesters intend to analyze the records they receive from this request and educate a broad audience of the interested public about them. And, Requesters have a demonstrated ability to do so.

B. REQUESTERS' LACK OF COMMERCIAL INTEREST

Turning to commercial interest, disclosure is not primarily in Requesters' commercial interest. As nonprofits, Requesters have no commercial interest in the records requested. *See Am. Ctr. for L. & Just. v. U.S. Dep't of Homeland Sec.*, 573 F. Supp. 3d 78, 84 (D.D.C. 2021) (“[N]onprofit organizations by definition have no commercial interests.”); *Am. Immigr. Council v. U.S. Dep't of Homeland Sec.*, 82 F. Supp. 3d 396, 406 (D.D.C. 2015) (finding that the Council has no such interest in its record requests). Rather, the request furthers Requesters' work to increase public understanding of immigration processes, including the dismissal of immigration court proceedings so that ICE may channel respondent noncitizens into expedited removal.

Alternatively, and additionally, the public interest in obtaining a better understanding of EOIR's actions discussed above exceeds any commercial interest that EOIR may ascribe to Requesters in records responsive to this request.

Thank you for your attention to this request. If you have any questions regarding this request, please do not hesitate to contact us.

Very truly yours,

/s/ Chris Opila

Christopher (“Chris”) Opila
Staff Attorney (Transparency)
American Immigration Council
PMB2026
2001 L Street N.W., Suite 500
Washington, DC 20036
202-507-7699 | copila@immcouncil.org

/s/Rex Chen

Rex Chen
Supervising Counsel for Immigrant Rights
LatinoJustice PRLDEF,
475 Riverside Drive Suite 1901
New York, NY 10115
212-219-3360 | rchen@latinojustice.org



July 28, 2025

Via Public Access Link Portal & Certified Mail

U.S. Department of Justice
Executive Office for Immigration Review
Office of General Counsel – FOIA Service Center
5107 Leesburg Pike, Suite 1903
Falls Church, VA 22041

Director of Public Affairs
Office of Public Affairs
Department of Justice,
950 Pennsylvania Avenue NW
Washington, DC 20530-0001

Re: Freedom of Information Act Request on Terminations of Immigration Proceedings and ICE Arrests at Immigration Courts

Dear FOIA Officer:

The American Immigration Council (the “Council”) and LatinoJustice PRLDEF (collectively, “Requesters”) submit this request to the Executive Office for Immigration Review (“EOIR”) under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552.

Since around the middle of May 2025, U.S. Immigration and Customs Enforcement (“ICE”) has been moving to dismiss immigration proceedings against noncitizens in EOIR immigration courts around the country to pursue their expedited removal. Requesters seek certain records about these dismissals as well as expedited processing and a fee waiver.

I. REQUEST FOR INFORMATION

Requesters seek all guidance, instructions, policies, templates, and other similar records¹ created by, provided to, or otherwise in the possession of EOIR for dismissing or terminating an immigration case or proceeding issued since January 20, 2025.

¹ These records include but are not limited to guidance, instructions, policies, templates, and other similar records that take the form of an email sent by EOIR.ocij.all.of.acijs@doj365.onmicrosoft.com. See Julia Ainsely, *Trump Admin Tells Immigration Judges to Dismiss Cases in Tactic to Speed Up Arrests*, NBC News (June 11, 2025, 5:00AM), <https://www.nbcnews.com/politics/national-security/trump-admin-tells-immigration-judges-dismiss-cases-tactic->

II. FORMAT OF PRODUCTION

Requesters seek responsive electronic records in a machine-readable, native file format, with all metadata and load files. Requesters ask EOIR to produce responsive materials in their entirety, including all attachments, appendices, enclosures, and/or exhibits, in a text-searchable, static-image format (PDF), in the best image quality in the agency's possession, and that the records be provided in separate, Bates-stamped files.

III. EXPEDITED PROCESSING

Requesters seek expedited processing of this request and certify that the statements herein are “true and correct” pursuant to 28 C.F.R. § 16.5(e)(3). FOIA obligates EOIR to process requests expeditiously in two cases: (i) those where a requester “demonstrates a compelling need”—such as “urgency to inform the public concerning actual or alleged Federal Government activity” if the requester is “primarily engaged in disseminating information,” 5 U.S.C. § 552(a)(6)(E)(i), (v)—and (ii) “in other cases determined by the agency,” *id.* § 552(a)(6)(E)(i), which, for the Department of Justice, include “[a] matter of widespread and exceptional media interest in which there exist possible questions about the government's integrity which affect public confidence,” 28 C.F.R. § 16.5(e)(1)(ii), (iv). Both cases exist here.

A. A MATTER OF WIDESPREAD AND EXCEPTIONAL INTEREST RAISING GOVERNMENT INTEGRITY CONCERNS

EOIR's dismissal of noncitizens' immigration court cases to facilitate their expedited removal is a matter of widespread and exceptional media interest in which there exist possible questions about the government's integrity which affect public confidence.

Fifty articles on an issue make it a matter of widespread and exceptional public interest. *Citizens for Resp. & Ethics in Wash. v. U.S. DOGE Serv.*, Case No. 25-cv-511 (CRC), 2025 WL 752367, at *13 (D.D.C. Mar. 10, 2025) (hereinafter “CREW”) *see also Brennan Ctr. for Just. v. Dep't of Com.* 498 F. Supp. 3d 87, 97 (D.D.C. 2020). A “handful of articles” also establishes such interest where the articles are “in a variety of publications” and “repeatedly reference the ongoing national discussion.” *Am. Civ. Liberties Union v. Dep't of Just.*, 321 F. Supp. 2d 24, 32 (D.D.C. 2004).

Here, state, local, and nationwide media outlets have published at least at least eighty five articles since May 21, 2025, about ICE asking immigration judges to dismiss noncitizens'

[speed-arrest-rcna212138](https://www.washingtonpost.com/news/immigration/wp/2025/05/30/ice-arrests-immigration-court-judges-to-dismiss-non-citizens-7-articles-2025-05-30/) (referencing “memo” entitled “Guidance on Case Adjudication” sent over email on May 30, 2025); Mark Rivera et al., *ICE Arrests at Immigration Court in Chicago, Nationwide Labeled ‘Unlawful’ in New Lawsuit*, ABC 7 Chicago (July 18, 2025, 8:36 PM), <https://abc7chicago.com/post/us-immigration-news-ice-arrests-courts-chicago-nationwide-labeled-unlawful-new-lawsuit-trump-administration/17186490/> (same).

immigration cases so it can pursue these noncitizens' expedited removal.² Immigration attorneys also report ICE officials serving pre-signed dismissals based on “non-opposition” to noncitizen

² Margaret Kadifa, *ICE Arrests All Adults Without Children at S.F. Immigration Court Today*, Mission Local (July 25, 2025, 1:05 PM), <https://missionlocal.org/2025/07/hed-ice-steps-up-arrests-at-s-f-immigration-court/> (hereinafter, “Kadifa re: Adult Arrests”); Pedro Camacho, *ICE Arrests Migrant Deemed Mentally Impaired by Judge as He Exits Immigration Court: ‘He’s Clearly Not Understanding the Questions’*, The Latin Times (July 25, 2025, 10:36 AM), <https://www.latintimes.com/ice-arrests-migrant-deemed-mentally-impaired-judge-he-exits-immigration-court-hes-clearly-not-587576>; Jordan Salama, *When ICE Agents Are Waiting Outside the Courtroom*, The New Yorker (July 25, 2025), <https://www.newyorker.com/news/the-lede/when-ice-agents-are-waiting-outside-the-courtroom>; Maurice DuBois et al., *3 Immigration Judges Speak Out About Their Firings: ‘It Was Arbitrary, Unfair*, CBS News (July 24, 2025, 8:34 PM), <https://www.cbsnews.com/boston/news/immigration-judges-speak-out-firings-arbitrary-unfair/?intcid=CNM-00-10abd1h>; Danielle James, *ICE Arrests at Check-Ins, Court Hearings Are on the Rise. Michigan Is No Exception*, MLIVE (July 21, 2025, 7:10 AM), <https://www.mlive.com/politics/2025/07/ice-arrests-at-check-ins-court-hearings-are-on-the-rise-michigan-is-no-exception.html>; Margaret Kadifa, *ICE Agents Keep Snatching Asylum Seekers Immediately After Their Court Hearings*, Mother Jones (July 21, 2025), <https://www.motherjones.com/politics/2025/07/ice-agents-arrest-asylum-seekers-after-court-hearings-san-francisco/>; Martha Bellisile et al., *Volunteers Flock to Immigration Courts to Support Migrants Arrested in the Hallways*, ABC News (July 20, 2025, 8:38 AM), <https://abcnews.go.com/US/wireStory/volunteers-flock-immigration-courts-support-migrants-arrested-hallways-123902561>; Rivera et al., *supra* n. 1; Eduardo Cuevas, *‘Escalation:’ Federal Agents Now Detaining People with Active Immigration Cases*, USA Today (July 18, 2025, 11:26 AM), <https://www.usatoday.com/story/news/nation/2025/07/18/migrants-immigration-court-trump-crackdown/84614161007/>; Martha Bellisile, *Homeland Security Officials Defend Immigration Court Arrests After Being Sued*, Associated Press (July 17, 2025, 2:04 PM), <https://apnews.com/article/ice-immigration-court-immigrants-a5190ada4a6019f84d76e62c11c44e30>; Swasti Singhai, *Five Days, 12 Arrests: A Week Inside San Diego Immigration Court*, Times of San Diego (July 17, 2025, 7:41 AM), <https://timesofsandiego.com/politics/2025/07/17/arrests-immigration-court-trump-anxiety-chaos/> (hereinafter, “Singhai re: Week at San Diego Immigration Court”); Devan Cole et al., *Trump Administration Sued Over ICE Arrests at Immigration Courthouses*, CNN (July 16, 2025, 6:23 PM), <https://www.cnn.com/2025/07/16/politics/ice-immigration-courthouse-arrests-lawsuit>; Luis Ferré-Sadurní, *Immigrants File Class-Action Lawsuit to Stop IC Courthouse Arrests*, NY Times (July 16, 2025), <https://www.nytimes.com/2025/07/16/nyregion/trump-ice-arrests-lawsuit-immigrants.html> (hereinafter, “Ferré-Sadurní re: Lawsuit”); Maxine Bernstein, *Federal Judge in Oregon: Homeland Security ‘Tricked’ Asylum Seeker Before Arrest at Immigration Court*, The Oregonian (July 15, 2025, 10:47 AM), <https://www.oregonlive.com/pacific-northwest-news/2025/07/federal-judge-in-oregon-homeland-security-tricked-asylum-seeker-before-arrest-at-immigration-court.html>; Sarah Thamer, *Advocates Denounce ICE Arrests at Fort Snelling Immigration Court*, MPR News (July 15, 2025, 4:00 AM), <https://www.mprnews.org/story/2025/07/15/advocates-protest-ice-arrests-at-immigration-court>; Paige Browning & John O’Brien, *Fears of Arrests Cause Tension at Seattle Immigration Court*, KUOW (July 10, 2025, 5:58 PM), <https://www.kuow.org/stories/fears-of-ice-arrests-cause-tension-at-seattle-immigration-court>; Margaret Kadifa, *ICE Arrests 4 People After Immigration Court Hearings in San Francisco*, Mission Local (July 10, 2025, 12:08 PM), <https://missionlocal.org/2025/07/ice-arrests-four-people-after-they-appear-in-immigration-court/> (hereinafter, “Kadifa re: 4 Arrests”); *What Goes On in America’s Immigration Courts*, Economist (July 10, 2025), <https://www.economist.com/united-states/2025/07/10/what-goes-on-in-americas-immigration-courts>; Francesca Regalado & Soumya Karlamangla, *Tensions Escalate in San Francisco over Immigration Enforcement*, NY Times (July 9, 2025), <https://www.nytimes.com/2025/07/09/us/ice-immigration-protest-san-francisco.html>; Tom Li & Ko Lyn Cheang, *Video: Protestors Cling to Departing ICE Van After Arrest at S.F. Immigration Court*, San Francisco Chronicle (July 8, 2025, 5:34 PM), <https://www.sfchronicle.com/sf/article/protesters-cling-ice-van-chaos-immigration-court-20761721.php>; Nisa Khan, *When ICE Is Waiting at Immigration Court, What Can Advocates Do?*, KQED (July 7, 2025), <https://www.kqed.org/news/12047018/how-legal-experts-advocates-are-responding-to-the-detention-of-asylum-seekers>; Emma Seiwel, *ICE Opposition Grows, With Lawmakers, Attorneys*

Decrying Courthouse Arrests as a Violation of Due Process, NY Daily News (July 5, 2025, 6:00 AM), <https://www.nydailynews.com/2025/07/05/ice-opposition-grows-with-lawmakers-attorneys-decrying-courthouse-arrests-a-violation-of-due-process/> (hereinafter “Seiwell re: ICE Opposition Grows”); Jim Vertuno, *Honduran Family Freed From Detention After Lawsuit Against ICE Courthouse Arrests*, Associated Press (July 3, 2025, 6:14 PM), <https://apnews.com/article/ice-family-children-lawsuit-release-ef8d764aebec8ba1b67bafc9080a563d>; Emma Seiwell, *ICE Agents Now Snatching Migrants With Open Court Cases; NY Officials, Lawyers Say It’s ‘Utterly Unlawful’*, NY Daily News (July 3, 2025, 6:50 AM), <https://www.nydailynews.com/2025/07/02/ice-agents-now-snatching-migrants-with-open-court-cases-nyc-officials-lawyers-say-its-utterly-unlawful/> (hereinafter, “Seiwell re: ICE Snatching”); Melissa Gomez, *Faith Leaders Bear Witness as Migrants Make Their Case in Immigration Court*, Los Angeles Times (July 2, 2025, 3:00 AM), <https://www.latimes.com/california/story/2025-07-02/faith-leaders-bear-witness-as-migrants-make-their-case-immigration-court> (hereinafter, “Gomez re: Faith Leaders”); Shelby Bremer, *Lawsuit over San Diego Immigration Court Arrest May Give Insight Into ICE Practices*, NBC San Diego (July 1, 2025, 6:01 PM), <https://www.nbcsandiego.com/news/local/san-diego-lawsuit-ice-courthouse-arrests/3861107/>; Madeleine May & Hannah Marr, *Afghan Ally Detained by ICE After Attending Immigration Court Hearing*, CBS News (July 1, 2025, 1:48 PM), <https://www.cbsnews.com/news/afghan-ally-detained-by-ice-immigration-court/>; Margaret Kadifa, *For One S.F. Asylum Seeker, ICE Arrest Meant Move to More Conservative Judge*, Mission Local (July 1, 2025, 4:00 AM), <https://missionlocal.org/2025/07/sf-asylum-seeker-immigration-judge-ice-arrest/> (hereinafter “Kadifa re: Forum Shopping”); Natali Yahr, *Wisconsin Asylum Seeker Miguel Robles Detained in Unprecedented Wave of Courthouse Arrests*, Racine County Eye (July 1, 2025), <https://racinecountyeve.com/2025/06/30/miguel-robles-immigration-asylum/>; Gwynne Hogan, *He Fled Death Threats for Being Gay, Applied for Asylum and Married a U.S. Citizen. ICE Arrested Him Anyway*, The City (June 30, 2025, 1:41 PM), <https://www.thecity.nyc/2025/06/27/ice-arrested-asylum-gay/> (hereinafter “Hogan re: Mamadou Arrest”); Ko Lyn Cheang, *S.F. Drag Performer Detained by ICE After Asylum Hearing*, San Francisco Chronicle (June 28, 2025), <https://www.sfchronicle.com/sf/article/drag-performer-detained-ice-20399122.php>; Anna-Cat Brigida, *A Legal Trap? Why the Trump Administration is Targeting Immigration Courts for Arrests*, Al Jazeera (June 27, 2025), <https://www.aljazeera.com/news/longform/2025/6/27/why-the-trump-administration-is-targeting-immigration-courts-for-arrests>; Julia Marnin, *6-Year-Old Boy with Leukemia Arrested by ICE is Now Detained in Texas, Suit Says*, Fort Worth Star-Telegram (June 26, 2025, 3:23 PM), <https://www.star-telegram.com/news/state/texas/article309472695.html>; Dan Katz, *ICE Arrested a 6-Year-Old Boy with Leukemia at Immigration Court. His Family is Suing*, Texas Public Radio (June 25, 2025, 11:06 PM), <https://www.tpr.org/border-immigration/2025-06-25/ice-arrested-a-6-year-old-boy-with-leukemia-at-immigration-court-his-family-is-suing>; Nina Shapiro, *As Pushback Grows to WA Immigration Court Arrests, ICE Changes Tactics*, The Seattle Times (June 24, 2025, 6:00 AM), <https://www.seattletimes.com/seattle-news/as-pushback-grows-to-wa-immigration-court-arrests-ice-changes-tactics/> (hereinafter “Shapiro re: ICE Tactic Change”); Kate Morrissey, *Here’s What’s Happening to the People ICE Arrests in Immigration Court*, Capital & Main (June 24, 2025), <https://capitalandmain.com/heres-whats-happening-to-the-people-ice-arrests-in-immigration-court>; Elizabeth L.T. Moore & Elizabeth Zavala, *Obscure San Antonio Court Becomes Flashpoint in Immigration Debate*, San Antonio Express-News (June 23, 2025), <https://www.expressnews.com/news/article/obscure-san-antonio-immigration-court-spotlight-20381608.php>; Luis Ferré-Sadurní, *Brad Lander Tried to Escort Immigrants facing Arrest. He’s Not Alone*, NY Times (June 19, 2025), <https://www.nytimes.com/2025/06/19/nyregion/ice-immigrants-volunteer-escorts-courthouse.html> (hereinafter “Ferré-Sadurní re: Lander Escort”); Lily Celeste, *ICE Detains Three People Attending Their Immigration Hearings in Harlingen*, KRGV.Com (June 15, 2025, 6:40 PM), <https://www.krgv.com/news/ice-detains-three-people-outside-harlingen-immigration-court/>; Ryan Oehrli, *‘Rigged’? ICE Agents Are Arresting People at Charlotte’s Immigration Court*, The Charlotte Observer (June 12, 2025, 11:31 AM), <https://www.charlotteobserver.com/news/local/crime/article308209165.html>; Armando Garcia, *Immigrant Rights Group Say ICE Officers ‘Ambush Noncitizens’ in Courthouse Arrests, Ask Judge to Intervene*, ABC News (June 12, 2025, 10:32 AM), <https://abcnews.go.com/US/immigrant-rights-groups-ice-officers-ambush-noncitizens-courthouse/story?id=122770040>; Thomas Lyons, *Mood is Tense at Concord Immigration Court Following ICE Arrests*, BerkeleySide (June 12, 2025, 9:55 AM), <https://www.berkeleyside.org/2025/06/12/concord-immigration-court-tension-after-ice-arrests>; Ximena Bustillo, *ICE’s Novel Strategy Allows for More Arrests from Inside Immigration Courts*, NPR

(June 12, 2025, 5:02 AM), <https://www.npr.org/2025/06/12/nx-s1-5409403/trump-immigration-courts-arrests>; Luis Ferré-Sadurní, *Inside a Courthouse, Chaos and Tears as Trump Accelerates Deportations*, NY Times (June 12, 2025), <https://www.nytimes.com/2025/06/12/nyregion/immigration-courthouse-arrests-trump-deportation.html> (hereinafter “Ferré-Sadurní re: Inside NYC Immigr. Cts.”); Martha Bellisile et al., *Immigration Officers Intensify Arrests in Courthouse Hallways on a Fast Track to Deportation*, Associated Press (June 11, 2025, 4:17 PM), <https://apnews.com/article/immigration-court-arrests-ice-deportation-99d822cdc93ae7dc26026c27895d5ea1>; Brittany Taylor et al., *Second Day of Arrests by ICE Agents at Immigration Court in Southwest Houston*, Click 2 Houston.com (June 11, 2025, 10:25 AM), <https://www.click2houston.com/news/local/2025/06/11/ice-agents-stationed-outside-immigration-court-in-houstons-greenspoint-area/>; Ainsely, *supra* n. 1; Conrad Wilson, *ICE Arrests 2 More Asylum Seekers at Immigration Court in Portland*, OPB (June 10, 2025, 5:12 PM), <https://www.opb.org/article/2025/06/10/ice-arrests-2-more-asylum-seekers-at-immigration-court-in-portland/> (hereinafter, “Wilson re: Two Arrests”); Ninfa Saavedra & Robert Arnold, *ICE Arrests Multiple People at Houston’s Immigration Court*, Click2Houston.com (June 10, 2025, 2:48 PM), <https://www.click2houston.com/news/local/2025/06/10/ice-arrests-reportedly-underway-at-houstons-immigration-court/>; Natalie Weber, *ICE Detains Multiple Men at Houston Immigration Courthouse, Civil Rights Organization Says*, Houston Public Media (June 10, 2025, 11:58 AM), <https://www.houstonpublicmedia.org/articles/news/politics/immigration/2025/06/10/523600/ice-detains-multiple-men-at-houston-immigration-courthouse/>; Giulia McDonnell Nieto del Rio, *This Is What An ICE Arrest in Boston Immigration Court Looks Like*, Boston Globe (June 9, 2025, 6:31 AM), <https://www.bostonglobe.com/2025/06/09/metro/ice-arrests-at-boston-immigration-court/> (hereinafter, “Nieto del Rio re: Inside Boston Immigr. Ct. Arrest”); Audrey Conklin & Bill Melugin, *Trump’s ICE Launches Bold Courthouse Migrant Arrest Strategy to Fast-Track Deportations Biden Avoided*, Fox News (June 9, 2025, 4:00 AM), <https://www.foxnews.com/us/trumps-ice-launches-bold-courthouse-migrant-arrest-strategy-fast-track-deportations-biden-avoided?msocid=1cd283b1756f61231883976574c46057>; Conrad Wilson, *ICE Detains Another Asylum-Seeker Outside Portland Courtroom, Legal Petition Says*, OPB (June 6, 2025, 9:30 AM), <https://www.opb.org/article/2025/06/06/asylum-arrest-portland-yzlh/> (hereinafter, “Wilson re: Arrest”); Amy Larson, *Newlywed Couple Separated at Immigration Courthouse by ICE*, The Hill (June 5, 2025, 1:14 PM), <https://thehill.com/homenews/state-watch/5334753-immigration-courthouse-ice-trump-dhs/>; Laura Romero et al., *In a New Tactic, ICE Is Arresting Migrants at Immigration Courts, Attorneys Say*, ABC News (June 4, 2025, 6:37 PM), <https://abcnews.go.com/US/new-tactic-ice-arresting-migrants-immigration-courts-attorneys/story?id=122513021>; Julie Carey, *Cancel, Arrest, Deport: Immigration Lawyer Warns of Emerging ICE Tactic*, 4 Washington (June 4, 2025, 3:01 PM), <https://www.nbcwashington.com/news/local/cancel-arrest-deport-immigration-lawyer-warns-of-emerging-ice-tactic/3927509/>; Brad Schmidt, *Immigration Arrest at Courthouse Marks First for Portland*, The Oregonian (June 3, 2025, 3:22 PM), <https://www.oregonlive.com/politics/2025/06/immigration-arrest-at-courthouse-marks-first-for-portland.html>; Stephen Franklin & Katema Hosseini, *ICE Target Noncitizens As Cases Dismissed in Immigration Court in Chicago*, Borderless (June 3, 2025), <https://borderlessmag.org/2025/06/03/ice-arrests-chicago-immigration-court-trump-detention-immigration-custom-enforcement/>; Conrad Wilson, *ICE Detains Asylum Seeker Outside Portland Immigration Court, Lawyers Say*, OPB (June 2, 2025, 11:01 PM), <https://www.opb.org/article/2025/06/02/ice-immigration-enforcement-detains-asylum-seeker-portland-court/>; Angélica Franganillo Díaz & Priscilla Alvarez, *ICE Targets Migrants for Arrest at Courthouses as Trump Administration Intensifies Deportation Push*, CNN (June 2, 2025, 5:00 AM), <https://www.cnn.com/2025/06/02/politics/ice-arrests-migrants-courthouse/>; Shelly Bradbury, *Feds Detain Immigrant Family at Denver Courthouse Amid New Trump Strategy*, Denver Post (May 30, 2025, 3:32 PM), <https://www.denverpost.com/2025/05/30/denver-immigration-arrest-courthouse-ice-trump/>; Giulia McDonnell Nieto del Rio, *ICE Arrests at Massachusetts Immigration Courts Target Immigrants Seeking Permission to Stay in US*, Boston Globe (May 30, 2025, 1:39PM), <https://www.bostonglobe.com/2025/05/27/metro/immigration-courts-ice-arrests-massachusetts> (hereinafter, “Nieto del Rio re: Boston Immigr. Ct. Arrests”); Suzanne Gamboa, *Immigration Arrests in Courthouses Have Become the New Deportation Tool, Stripping Migrants of a Legal Process*, NBC News (May 30, 2025, 5:00 AM), <https://www.nbcnews.com/news/latino/immigrations-arrests-ice-deportations-courthouse-legal-process-ice->

[rcna209671](#); Hamed Aleaziz et al., *How ICE is Seeking to Ramp Up Deportations Through Courthouse Arrests*, NY Times (May 30, 2025), <https://www.nytimes.com/2025/05/30/us/politics/ice-courthouse-arrests.html>; Allison Sherry, *Signaling a Policy Shift, ICE Detains a Family Who Showed Up at Denver Immigration Court for a Check-In*, CPR News (May 29, 2025, 1:35 PM), <https://www.cpr.org/2025/05/29/ice-detains-family-denver-immigration-court/>; Daniel Gonzalez & Richard Ruelas, *After Short Break, ICE Resumes Arrests at Phoenix Immigration Court, Changes Keep Tactic*, AZ Central (May 29, 2025, 5:01 AM), <https://www.azcentral.com/story/news/politics/immigration/2025/05/29/phoenix-immigration-court-ice-arrests-resume/83767918007/>; David Noriega, *Immigration Courts Are Dismissing Cases of Those Sent to El Salvador, Potentially Cutting Off Their Return*, NBC News (May 28, 2025, 5:10 PM), <https://www.nbcnews.com/news/latino/immigration-courts-alien-enemies-deportation-andry-hernandez-romero-rcna209402>; Gwynne Hogan, *Migrants, Protestors, and a Pastor Arrested Inside and Outside Manhattan Immigration Courthouses*, The City (May 28, 2025, 3:16 PM), <https://www.thecity.nyc/2025/05/28/ice-arrests-migrants-26-federal-plaza-pastor/> (hereinafter, “Hogan re: NYC Immigr. Ct. Arrests”); Tomoki Chien, *Undercover ICE Agents Begin Making Arrests at SF Immigration Court*, The San Francisco Standard (May 27, 2025, 5:32 PM), <https://sfstandard.com/2025/05/27/undercover-ice-agents-make-arrests-san-francisco-court/>; Michael Elsen-Rooney, *A Bronx High Schooler Showed Up for a Routine Immigration Court Date. ICE Was Waiting*, Chalkbeat New York (May 26, 2025, 8:35 pm), <https://www.chalkbeat.org/newyork/2025/05/27/bronx-high-school-student-detained-by-immigration-ice-agents/?ref=hellgatenyc.com> (hereinafter, “Elsen-Rooney re: Dylan Arrest”); Milena Malaver et al., *ICE Agents in Miami Find New Spot to Carry Out Arrests: Immigration Court*, Miami Herald (May 26, 2025, 1:27 PM), <https://www.miamiherald.com/news/local/immigration/article306900486.html>; Melissa Gomez, *Father Ripped from Family as Agents Target Immigration Courts, Arresting People After Cases Dismissed*, LA Times (May 24, 2025, 10:00AM), <https://www.latimes.com/california/story/2025-05-24/ice-agents-swarm-immigration-courts-arresting-people-after-cases-dismissed> (hereinafter, “Gomez re: Immigr. Ct. Arrests”); Tyche Hendriks, *‘Unprecedented’: ICE Officers Operating Inside Bay Area Immigration Courts, Lawyers Say*, KQED (May 24, 2025), <https://www.kqed.org/news/12041473/unprecedented-ice-officers-operating-inside-bay-area-immigration-courts-lawyers-say>; Camilo Montoya-Galvez & Nidia Cavazos, *ICE Ending Migrants’ Court Cases In Order to Arrest and Move to Deport Them*, CBS News (May 23, 2025, 9:53 AM), <https://www.cbsnews.com/news/ice-ending-migrants-court-cases-arrest-move-to-deport-them/>; Arelis R. Hernández & Maria Sacchetti, *Immigrant Arrests at Courthouses Signal New Tactic in Trump’s Deportation Push*, Washington Post (May 23, 2025), <https://www.washingtonpost.com/immigration/2025/05/23/immigration-court-arrests-ice-trump/>; Trevor Hughes, *ICE Agents Deploy New Tactic: Arresting People As They Leave Mandatory Court Hearings*, USA Today (May 22, 2025, 1:13 PM), <https://www.usatoday.com/story/news/nation/2025/05/22/ice-arrests-immigration-court-deportation-tactics/83792357007/>; Joshua Goodman et al., *They Came to Hearing at Chicago’s Immigration Court, Then Got Arrested*, Chicago Sun-Times (May 22, 2025, 3:59PM), <https://chicago.suntimes.com/immigration/2025/05/22/ice-agents-hallways-immigration-court-trump-mass-arrest>; Anders Hagstrom & Bill Melugin, *ICE Begins New, Nationwide Effort to Arrest Illegal Aliens at Immigration Hearings* (May 22, 2025, 1:07 PM), <https://www.foxnews.com/politics/ice-begins-new-nationwide-effort-arrest-illegal-aliens-immigration-hearings>; Joshua Goodman & Gisela Salomon, *ICE Agents Wait in Hallways of Immigration Court as Trump Seeks to Deliver on Mass Arrest Pledge*, Associated Press (May 22, 2025, 1:30 AM), <https://apnews.com/article/immigration-courts-arrests-trump-ice-deportations-fa96435d4ec021cc8ff636b23d80d848>; J. Dale Shoemaker, *ICE Raids Immigration Court in Buffalo*, Investigative Post (May 22, 2025), <https://www.investigativepost.org/2025/05/22/ice-raids-immigration-court-in-buffalo/>; Raphael Romero Ruiz et al., *For 2nd Day, People Attending Phoenix Immigration Hearings Arrested by ICE*, USA Today (May 21, 2025, 11:42 PM), <https://www.usatoday.com/story/news/politics/immigration/2025/05/21/ice-arrests-phoenix-immigration-court/83772323007/?gnt-cfr=1&gca-cat=p>; Gustavo Sagrero Álvarez, *ICE Agents at Seattle Courthouse Arrest People Whose Deportation Hearings are Dismissed*, KUOW (May 21, 5:45 PM), <https://www.kuow.org/stories/ice-agents-at-seattle-courthouse-arrest-people-whose-deportation-hearings-are-dismissed>; Akela Lacy et al. *ICE Agents Are Camped Outside Immigration Courts to Make Arrests*, The Intercept (May 21, 2025, 3:27 PM), <https://theintercept.com/2025/05/21/ice-agents-courts-arrests-immigrants-deport/>; Paul Ingram, *‘Mayhem’ As ICE Officials Arrest Multiple People at Immigration Court in Phoenix*, AZ Mirror (May 21, 2025, 11:12 AM),

respondents at immigration courts without respondents not having notice of ICE’s motion to dismiss their immigration case and an opportunity to oppose it. Much of the coverage on these dismissals casts doubt on their integrity, describing them as a violation of due process and a tactic to deport noncitizens without hearings.³ Some coverage even suggests that EOIR is firing immigration judges for refusing to dismiss cases.⁴

Dismissals at immigration courts and the ICE arrests that follow them have outraged Americans around the country. Opposition to these actions and doubts about their legality have prompted mass protests at immigration courts in New York, Seattle, San Francisco, and elsewhere.⁵ It has

<https://azmirror.com/2025/05/21/mayhem-as-ice-officials-arrest-multiple-people-at-immigration-court-in-phoenix/>; Nina Shapiro, *ICE Arrests at WA Immigration Court Spark Fear of Fast-Track Removal*, Seattle Times (May 21, 2025, 6:00 AM), <https://www.seattletimes.com/seattle-news/law-justice/ice-arrests-at-wa-immigration-court-spark-fear-of-fast-track-removal/> (hereinafter, “Shapiro re: ICE Arrests”).

³ Kadifa re: Adult Arrests, *supra* n. 2; Camacho, *supra* n. 2; Salama, *supra* n. 2; James, *supra* n. 2; Cole et al., *supra* n. 2; Ferré-Sadurní re: Lawsuit, *supra* n. 2; Cuevas, *supra* n. 2; Bernstein, *supra* n. 2; Browning & O’Brien, *supra* n. 2; Kadifa re: 4 Arrests, *supra* n. 2; Li & Cheang, *supra* n. 2; Khan, *supra* n. 2; Kadifa re: Forum Shopping, *supra* n. 2; Yahr, *supra* n. 2; Hogan re: Mamadou Arrest, *supra* n.2; Cheang, *supra* n. 2; Brigida, *supra* n. 2; Moore & Zavala, *supra* n. 2; Lyons, *supra* n. 2; Oehrli, *supra* n. 2; Garcia, *supra* n. 2; Bustillo, *supra* n. 2; Ferré-Sadurní re: Inside NYC Immigr. Cts., *supra* n. 2; Bellisile et al. re: Immigration Officers Intensify Arrests, *supra* n. 2; Wilson re: Two Arrests, *supra* n. 2; Saavedra & Arnold, *supra* n. 2; Nieto del Rio re: Inside Boston Immigr. Ct. Arrest, *supra* n. 2; Conklin & Melugin, *supra* n. 2; Wilson re: Arrest, *supra* n. 2; Romero et al., *supra* n. 2; Carey, *supra* n. 2; Franklin & Hosseini, *supra* n. 2; Bradbury, *supra* n. 2; Nieto del Rio re: Boston Immigr. Ct. Arrests, *supra* n. 2; Gamboa, *supra* n. 2; Aleaziz et al., *supra* n. 2; Chien, *supra* n. 2; Elsen-Rooney re: Dylan Arrest, *supra* n. 2; Malaver et al., *supra* n. 2; Gomez re: Immigr. Ct. Arrests, *supra* n. 2; Hernández & Sacchetti, *supra* n. 2; Hughes, *supra* n. 2; Ruiz et al, *supra* n. 2; Lacy et al, *supra* n. 2; Shapiro re: ICE Arrests, *supra* n. 2; Seiwel re: ICE Snatching, *supra* n. 2; Hendricks, *supra* n. 2; Seiwel re: ICE Opposition Grows, *supra* n. 2.

⁴ Dubois et al., *supra* n. 2.

⁵ Thamer, *supra* n. 2; Browning & O’Brien, *supra* n. 2; Alicia Victoria Lozano, *Violent Clashes at San Francisco Immigration Court Won’t Deter Protestors, Organizers Say*, NBC News (July 10, 2025, 4:43 PM), <https://www.nbcnews.com/news/us-news/violent-clashes-san-francisco-immigration-court-wont-deter-protesters-rcna218059>; Sarah Rumpf-Whitten, *Watch: ICE Agents Fight Off Masked Mob Outside Blue City Immigration Court*, FOX News (July 10, 2025, 1:12 PM), <https://www.foxnews.com/us/watch-ice-agents-fight-off-masked-mob-outside-blue-city-immigration-court>; Shay Arthur, *Crowd Gathers for Immigration Rally at Memphis Court*, WREG Memphis (July 8, 2025, 12:07 PM), <https://wreg.com/news/local/crowd-gathers-for-immigration-rally-at-memphis-court/>; Regalado & Karlamangla, *supra* n. 2; Li & Cheang, *supra* n. 2; Khan, *supra* n. 2; Stephania Jimenez, *PSL San Antonio Organizes Event to Educate Community on Immigration Laws Amid Rising IDE Deportations*, KSAT (July 1, 2025, 10:42 PM), <https://www.ksat.com/news/local/2025/07/02/psl-san-antonio-organizes-event-to-educate-community-on-immigration-laws-amid-rising-ice-deportations/>; May & Marr, *supra* n. 2; Nina Shapiro, *As Pushback Grows to WA Immigration Court Arrests, ICE Changes Tactics*, The Seattle Times (June 24, 2025, 6:00 AM), <https://www.seattletimes.com/seattle-news/as-pushback-grows-to-wa-immigration-court-arrests-ice-changes-tactics/>; Luis Ferré-Sadurní, *Brad Lander is Arrested by ICE Agents at Immigration Courthouse*, NY Times (June 17, 2025), <https://www.nytimes.com/2025/06/17/nyregion/brad-lander-immigration-ice.html>; Moore & Zavala, *supra* n. 2; Stephen Hobbs, *In Sacramento’s Immigration Court, ICE Detention Threats Leave Residents in Limbo*, The Sacramento Bee (June 14, 2025, 10:05 AM), <https://www.sacbee.com/news/politics-government/capitol-alert/article308346910.html>; Greg Micek et al., *Sacramento Immigration Court on Lockdown, Draws Protest After Suspected ICE Operation*, Capradio (June 12, 2025), <https://www.capradio.org/articles/2025/06/12/sacramento-immigration-court-on-lockdown-draws-protest-after-suspected-ice-operation/>; Lyons, *supra* n. 2; Ferré-Sadurní re:

also prompted clergy, political leaders, and other members of the public to accompany noncitizens to their immigration court dates to document dismissals and arrests, attempt to stop the latter, and help arrestees inform their families.⁶

Responsive records will address critical integrity questions left open by existing media coverage. Such records will show the exact policies underlying dismissals. They will also reveal the extent to which immigration courts remain neutral forums for adjudication and immigration judges retain discretion to consider the individual circumstances of a particular case when adjudicating ICE's motion to dismiss.

B. URGENCY TO INFORM THE PUBLIC ABOUT FEDERAL GOVERNMENT ACTIVITY BY A REQUESTER

Additionally, and alternatively, the Council has a compelling need for the records sought. It is primarily engaged in disseminating information. And urgency also exists to inform the public about the policies and guidance underlying immigration judges' dismissal of noncitizens' immigration court cases to facilitate expedited removal.

Inside NYC Immigr. Cts., *supra* n. 2; Bellisile et al. re: Immigration Officers Intensify Arrests, *supra* n. 2; Priscilla Alvarez, *ICE Protest Nationwide Comes As Agency Scrambles to Meet Trump's Immigration Arrest Quotas*, CNN (June 10, 2025, 10:16 PM), <https://www.cnn.com/2025/06/10/politics/ice-scrambles-immigration-arrest-quotas>; George Kelly & Max Harrison-Caldwell, *Protesters Shut Down Immigration Court After ICE Arrests*, The San Francisco Standard (June 10, 2025, 1:00 PM), <https://sfstandard.com/2025/06/10/protesters-surround-immigration-court-after-ice-arrests/>; Weber, *supra* n. 2; Joe Rivano Barros et al., *S.F. Police Arrest Dozens in 2nd Night of Protests Against ICE*, Mission Local (June 9, 2025, 8:16 PM), <https://missionlocal.org/2025/06/sf-mission-march-mobilized-thousands-against-ice/>; Aleaziz et al., *supra* n. 2; Hogan re: NYC Immigr. Ct. Arrests, *supra* n. 2; Ruiz et al, *supra* n. 2.

⁶ Salama, *supra* n. 2; Bellisile et al. re: Volunteers Flock to Immigration Courts, *supra* n. 2; Ferré-Sadurní re: Lawsuit, *supra* n. 2; Thamer, *supra* n. 2; Brian Strassburger, S.J. & William Critchley-Menor, S.J., *What We Saw During An ICE Arrest & Immigration Court Hearing: The Breakdown of Justice in America*, America: The Jesuit Review (July 11, 2025), <https://www.americamagazine.org/politics-society/2025/07/11/ice-immigration-court-deportation-injustice-251119>; Ciara Encinas, *Volunteers Describe How They Document ICE Arrests in Immigration Courts*, Fox 5 (July 11, 2025, 4:55 PM), <https://fox5sandiego.com/news/local-news/san-diego/san-diego-court-ice-arrests/>; Moore & Zavala, *supra* n. 2; Joey Safchik, *ICE Handcuffs 71-Year-Old Grandmother, a US Citizen, at San Diego Immigration Court*, 7 San Diego (July 9, 2025, 7:06 PM), <https://www.nbcсандiego.com/news/local/ice-arrests-71-year-old-grandmother-a-us-citizen-at-san-diego-immigration-court/3865098/>; Khan, *supra* n. 2; Swasti Singhai, *San Diego Volunteers Bear Witness Daily as ICE Continues Courtroom Arrests*, Times of San Diego (July 3, 2025, 3:41 PM), <https://timesofsandiego.com/life/2025/07/03/san-diego-community-bears-witness-as-ice-continues-courtroom-arrests/>; Gomez re: Faith Leaders, *supra* n. 2; Shapiro re: ICE Tactic Change, *supra* n. 2; Ray Sanchez & Allsha Ebrahimji, *Masked Ice Officers: The New Calling Card of The Trump Administration's Crackdown*, CNN (June 21, 2025), <https://www.cnn.com/us/ice-immigration-officers-face-masks>; Ferré-Sadurní re: Lander Escort, *supra* n. 2; Micek et al, *supra* n. 2. Ken Stone, *ICE Agents Scatter As SD Bishop Pham, Other Clergy Visit Immigration Court*, Times of San Diego (June 20, 2025, 3:04 PM), <https://timesofsandiego.com/life/2025/06/20/ice-agents-scatter-as-sd-bishop-pham-other-clergy-visit-immigration-court/>; Stephen Hobbs, *In Sacramento's Immigration Court, ICE Detention Threats Leave Residents in Limbo*, The Sacramento Bee (June 14, 2025, 10:05 AM), <https://www.sacbee.com/news/politics-government/capitol-alert/article308346910.html>; Carolina Estrada, *Two Men Detained by ICE After Sacramento Immigration Court Hearings*, KCRA3 (June 11, 2025, 11:13 PM), <https://www.kcra.com/article/two-men-detained-by-ice-sacramento-immigration-hearings/65041264>.

1. *The Council Primarily Engages in Information Dissemination*

The Council primarily engages in disseminating information and analysis on immigration and other issues. Organizations primarily engaged in information dissemination include not only “media organizations and newspapers,” *Heritage Found. v. Entl. Prot. Agency*, Civil Action No. 23-748, 2023 WL 2954418, *3 (D.D.C. 2023), but also “non-partisan law and public policy group[s]” like Requesters that “regularly write[], publish[], and disseminat[e], information online,” *Brennan Ctr. for Just.*, 498 F. Supp. 3d at 98 (Brennan Center); *see also Ctr. for Pub. Integrity v. U.S. Dep’t of Def.*, 411 F. Supp. 3d 5 (D.D.C. 2019) (Center for Public Integrity); *Protect Dem. Proj. v. U.S. Dep’t of Def.*, 263 F. Supp. 3d 293, 298 (D.D.C. 2017) (Protect Democracy Project); *Am. Civil Liberties Union*, 321 F. Supp. 2d at 29 n.5 (Electronic Privacy Information Center (“EPIC”)).

Like Brennan Center, Protect Democracy Project, EPIC, and Center for Public Integrity, the Council authors factsheets and special reports on proposed and actual immigration policies, some of which shape media coverage in outlets across the nation.⁷ It also analyzes immigration data and other government records—including those obtained through FOIA requests like this one—in interactive web reports.⁸ And it circulates its reports and factsheets through its website,⁹ blog, email newsletters, and an X (formerly known as Twitter) account with 64.9 thousand followers.¹⁰

2. *Urgency Exists to Inform the Public*

Urgency also exists to inform the public about the policies and guidance underlying the dismissal of noncitizens’ immigration court cases to facilitate expedited removal and the extent to which immigration judges retain the discretion to consider dismissal on a case-by-case basis.

⁷ See, e.g., *Trump-Backed Mass Deportations Would Cost Billions*, Report Says, CBS News (Oct. 3, 2024), <https://www.cbsnews.com/video/trump-backed-mass-deportations-would-cost-billions-report/> (discussing Am. Immigr. Council, *Mass Deportation: Devastating Costs to America, Its Budget and Economy* (Oct. 2, 2024), <https://www.americanimmigrationcouncil.org/report/mass-deportation/>); Emma Goldberg, *What if Trump Deported Millions of Immigrants*, The New York Times (Oct. 22, 2024), https://www.nytimes.com/interactive/2024/10/22/us/elections/trump-deportation.html?unlocked_article_code=1.Uk4.Pjao.990iYFTTpEl6 (same); *What Trump’s Mass Deportation Plan Might Look Like If He Wins the Election*, 60 Minutes (Oct. 27, 2024), <https://www.youtube.com/watch?v=WjCHjwISMFI> (same); *Mass Deportations*, Last Week Tonight (Oct. 27, 2024), <https://www.youtube.com/watch?v=0UEhMDAIX1Y> (same); *The Costs of Mass Deportation? Expert Breaks Down Trump’s Immigration Plan*, Amanpour & Company, (Oct. 28, 2024), <https://www.youtube.com/watch?v=Dmfo3atidKE> (same).

⁸ See Am. Immigr. Council, *Torrance County Detention Facility: Troubling Role in Detaining Haitian Migrants During the 2021 Del Rio Incident* (2024), <https://www.americanimmigrationcouncil.org/foia/torrance-detention-facility>; Am. Immigr. Council, *Ohio, We Have a Problem: Border Patrol & Local Law Enforcement’s Patterns & Tactics of Abuse in Ohio’s Immigration Enforcement* (2024), <https://www.americanimmigrationcouncil.org/foia/ohio-border-patrol-abuse>; Am. Immigr. Council, *Refugee Resettlement in U.S. Cities* (2019), https://data.americanimmigrationcouncil.org/en/refugee-resettlement-us/#exploratory_tool

⁹ The Council’s website received 4,506,460 views from 2,952,034 different users in 2024.

¹⁰ See <https://x.com/immccouncil>.

Requisite urgency exists where “the request touches on ‘a matter of current exigency to the American public’” and delay “compromises a significant recognized interest.” *Protect Dem. Proj.*, 263 F. Supp. 3d 293 at 299 (quoting *Al-Fayed v. CIA*, 254 F.3d 300, 310 (D.C. Cir. 2001)). Dismissal of immigration court cases to facilitate expedited removal is exigent to the American public, as demonstrated by the eighty plus articles cited in this request and protests inside and outside of immigration courts around the country. See *CREW*, 2025 WL 752367, at *13 (finding urgency to inform the public based on at least fifty articles on the issue); *Am. Civil Liberties Union of No. Cal. v. U.S. Dep’t of Def.*, No. C 06-01698, 2006 WL 1469418, at *6 (N.D. Cal. May 25, 2006) (same); 28 C.F.R. § 16.5(e)(3) (“The existence of numerous articles published on a given subject can be helpful to establishing the requirement that there be an ‘urgency to inform’ the public on the topic.”).

Delayed production of the policies and guidance for dismissal of noncitizens’ immigration court cases to facilitate expedited removal would compromise the ongoing public debate about the propriety of such dismissals. Cf. *CREW*, 2025 WL 752367, at *13 (expediting a request for records about the U.S. DOGE Service); *Protect Dem. Proj.*, 263 F. Supp. 3d 293 at 299 (expediting a request for records about a possible unlawful airstrike on Syria); *Am. Civil Liberties Union of N. Cal. v. U.S. Dep’t of Def.*, No. C. 06-01698, 2006 WL 1469418, at *6-7 (N.D. Cal. May 25, 2006) (expediting a request for records about possible unlawful military surveillance of protestors); *Freedom Coalition of Doctors for Choice v. Ctrs. For Disease Control & Prevention*, 2:23-cv-102, 2024 WL 69084, at *14 (N.D. Tex. Jan. 5, 2024) (expediting a request disputing the effectiveness of COVID-19 vaccines).

IV. FEE WAIVER REQUEST

Requestors seek a fee waiver since “disclosure of the requested records is in the public interest.” 5 U.S.C. § 552(a)(4)(A)(iii). EOIR must construe “the FOIA fee waiver provision . . . liberally . . . in favor of waivers for noncommercial requesters” like Requesters. *Schoenman v. FBI*, 604 F. Supp. 2d 174, 188 (D.D.C. 2009). Disclosure is in the public interest where it (A) “is likely to contribute significantly to public understanding of the operations or activities of the government” and (B) “is not primarily in the commercial interest of the [R]equesters.” 5 U.S.C. § 552(a)(4)(A)(iii); see also 28 C.F.R. § 16.10(k)(1). Requesters satisfy both requirements.

A. DISCLOSURE OF THE INFORMATION IS IN THE PUBLIC INTEREST

Disclosing the requested records is likely to contribute significantly to the public’s understanding of EOIR’s dismissal of immigration court cases and the extent to which dismissal remains a matter of discretion for immigration judges to consider on a case-by-case basis.

EOIR must consider two factors when assessing a disclosure’s contribution to public understanding of a government activity or operation, see 28 C.F.R. § 16.10(k)(2): (i) whether the request has a “direct and clear” rather than “remote or attenuated” connection to “identifiable operations or activities of the federal government”; and (ii) whether disclosure “would be likely to

contribute significantly to public understanding of those operations or activities.” *Id.* § 16.10(k)(2)(i)-(ii). Each factor supports a fee waiver here.

1. *Request Has a Direct and Clear Connection to Government Operations or Activities*

First, this request has a direct and clear relation to the following governmental operations and activities: EOIR’s dismissal or termination of immigration court proceedings so ICE can seek expedited removal of respondent noncitizens.

2. *Records Sought Will Contribute Significantly to Public Understanding of the Above*

Second, disclosing the records sought will “contribute significantly to public understanding of” the above activities. *Id.* § 16.10(k)(2)(ii). Such contribution exists where “[d]isclosure of the requested information [is] meaningfully informative about [these] activities” and “contribute[s] to the understanding of a reasonably broad audience of persons interested in the subject, as opposed to the individual understanding of the requester.” *Id.* 16.10(k)(2)(ii)(A)-(B). Both criteria are satisfied here.

i. DISCLOSURE OF RECORDS IS MEANINGFULLY INFORMATIVE

Disclosing requested records will be meaningfully informative about EOIR’s dismissal or termination of immigration court proceedings so ICE can seek expedited removal of respondent noncitizens. Disclosure is meaningfully informative where disclosed information is not “in the public domain, in either the same or a substantially identical form.” *Id.* § 16.10(k)(2)(ii)(A).

Here, as demonstrated by the media coverage cited above, the public only knows that ICE is arresting noncitizens at or near immigration courts after moving to dismiss their immigration cases and that immigration judges are granting many dismissals, thereby allowing ICE to pursue expedited removal.¹¹ Public knowledge does not extend to the exact guidance that immigration judges are receiving from their superiors or the extent to which dismissal remains a matter of discretion for judges to consider on a case-by-case basis. Requested records are therefore “meaningfully informative” about each of these activities.

ii. DISCLOSURE OF RECORDS CONTRIBUTES TO UNDERSTANDING OF A REASONABLY BROAD AUDIENCE

Disclosing requested records will contribute to the understanding of a reasonably broad audience of persons interested in EOIR’s dismissal or termination of immigration court proceedings so ICE can seek expedited removal of respondent noncitizens.

Requesters presumably satisfy this consideration as representatives of the news media. *Id.* § 16.10(k)(2)(ii)(B). They both “gather[] information of potential interest to a segment of the public,

¹¹ See generally Media articles cited in footnotes 2-6.

use[] [their] editorial skills to turn the raw materials into a distinct work, and distribute[] that work to an audience.” *Id.* § 16.10(b)(6); see also *Serv. Women’s Action Network v. Dep’t of Def.*, 888 F. Supp. 2d 282, 287-88 (D. Conn. 2012) (finding that ACLU is a news media representative); cf. *Elec. Privacy Info. Ctr. v. Dep’t of Def.*, 241 F. Supp. 2d 5, 10-15 (D.D.C. 2003) (finding that an organization similar to the Council is a news media representative).

Additionally, and alternatively, the ongoing and extensive media coverage in nationwide, state, and local outlets about dismissals of immigration proceedings demonstrates interest in this subject by a reasonably broad audience. Requesters intend and are well-equipped to inform this audience about the information contained in responsive records, as they are experts in educating the public about immigration issues.

As detailed further in the expedited processing section, the Council analyzes government records—including those obtained through FOIA requests like this one—in interactive web reports and other publications available for free on its website.¹² And it circulates these publications for free through its website,¹³ blog, email newsletters, and an X account with 64.9 thousand followers. It intends to publish content about records obtained from this request on its website and otherwise disseminate that content to its readers and the larger public.

Similarly, LatinoJustice PRLDEF produces newsletters, blogs, reports, opinion, editorials, and video interviews about the constitutional rights and equal protection of Latinos, immigrants, and other marginalized communities.¹⁴ And it circulates these publications through its social media accounts. All of its materials are free and available to the public on its website.

In sum, Requesters intend to analyze the records they receive from this request and educate a broad audience of the interested public about them. And, Requesters have a demonstrated ability to do so.

B. REQUESTERS’ LACK OF COMMERCIAL INTEREST

Turning to commercial interest, disclosure is not primarily in Requesters’ commercial interest. As nonprofits, Requesters have no commercial interest in the records requested. See *Am. Ctr. for L. & Just. v. U.S. Dep’t of Homeland Sec.*, 573 F. Supp. 3d 78, 84 (D.D.C. 2021) (“[N]onprofit organizations by definition have no commercial interests.”); *Am. Immigr. Council v. U.S. Dep’t of Homeland Sec.*, 82 F. Supp. 3d 396, 406 (D.D.C. 2015) (finding that the Council has no such interest in its record requests). Rather, the request furthers Requesters’ work to increase public

¹² See, e.g., *Torrance County Detention Facility: Troubling Role in Detaining Haitian Migrants During the 2021 Del Rio Incident*, *supra* n. 8; *Ohio, We Have a Problem: Border Patrol & Local Law Enforcement’s Patterns & Tactics of Abuse in Ohio’s Immigration Enforcement*, *supra* n. 8; *Refugee Resettlement in U.S. Cities*, *supra* n. 8.

¹³ The Council’s website received 4,506,460 views from 2,952,034 different users in 2024.

¹⁴ See, e.g., *LatinoJustice PRLDEF, 100 Days Later: The Harm So Far to Latinx Communities* (April 2025), <https://www.latinjustice.org/en/pressreport/100-days-later-harm-so-far-latinx-communities>; *LatinoJustice PRLDEF, A Promise to Harm: What’s at Stake for the Latino Community in Project 2025* (Oct. 2024), <https://www.latinjustice.org/en/pressreport/promise-harm-whats-stake-latinx-community-project-2025>;

understanding of immigration processes, including the dismissal of immigration court proceedings so that ICE may channel respondent noncitizens into expedited removal.

Alternatively, and additionally, the public interest in obtaining a better understanding of EOIR's actions discussed above exceeds any commercial interest that EOIR may ascribe to Requesters in records responsive to this request.

Thank you for your attention to this request. If you have any questions regarding this request, please do not hesitate to contact us.

Very truly yours,

/s/ Chris Opila

/s/Rex Chen

Christopher ("Chris") Opila
Staff Attorney (Transparency)
American Immigration Council
PMB2026
2001 L Street N.W., Suite 500
Washington, DC 20036
202-507-7699 | copila@immcouncil.org

Rex Chen
Supervising Counsel for Immigrant Rights
LatinoJustice PRLDEF,
475 Riverside Drive Suite 1901
New York, NY 10115
212-219-3360 | rchen@latinojustice.org



July 28, 2025

Via Public Access Link Portal & Certified Mail

U.S. Department of Justice
Executive Office for Immigration Review
Office of General Counsel – FOIA Service Center
5107 Leesburg Pike, Suite 1903
Falls Church, VA 22041

Director of Public Affairs
Office of Public Affairs
Department of Justice,
950 Pennsylvania Avenue NW.
Washington, DC 20530-0001

Re: Freedom of Information Act Request on Terminations of Immigration Proceedings and ICE Arrests at Immigration Courts

Dear FOIA Officer:

The American Immigration Council (the “Council”) and LatinoJustice PRLDEF (collectively, “Requesters”) submit this request to the Executive Office for Immigration Review (“EOIR”) under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552.

Since around the middle of May 2025, U.S. Immigration Customs and Enforcement (“ICE”) has been arresting noncitizens in or near EOIR immigration courts when noncitizens appear for a hearing in their immigration cases. ICE has also sought to dismiss these cases so it can seek the expedited removal of respondent noncitizens. Requesters seek certain records about these arrests and dismissals as well as expedited processing and a fee waiver.

I. REQUEST FOR INFORMATION

Requesters seek all emails,¹ correspondence, calendar entries, meeting notes, text messages, Signal messages, WhatsApp messages, Microsoft Teams messages, and other similar

¹ Requested emails exclude duplicates. (E.g. agencies should only produce one record of an email chain that contains all emails in that chain, rather than a record for each new email in the chain that contains all emails in the chain prior to that email).

communication records² between one or more individuals listed in Column A of the table below and one or more individuals listed in Column B about a topic listed in Column C from April 1, 2025, to the date of a reasonable search for responsive records.

A	B	C
The Chief Immigration Judge	An Immigration Judge (“IJ”) with a non-detained docket	An ICE enforcement operation in or near an immigration court
A Regional Deputy Chief Immigration Judge (“RDCJ”)		An ICE arrest in or near an immigration court
An Assistant Chief Immigration Judge (“ACIJ”)		A dismissal or termination of an immigration case or proceedings in immigration court ³
A Court Administrator		

II. FORMAT OF PRODUCTION

Requesters seek responsive electronic records in a machine-readable, native file format, with all metadata and load files. Requesters ask EOIR to produce responsive materials in their entirety, including all attachments, appendices, enclosures, and/or exhibits, in a text-searchable, static-image format (PDF), in the best image quality in the agency’s possession, and that the records be provided in separate, Bates-stamped files.

III. EXPEDITED PROCESSING

Requesters seek expedited processing of this request and certify that the statements herein are “true and correct” pursuant to 28 C.F.R. § 16.5(e)(3). FOIA obligates EOIR to process requests expeditiously in two cases: (i) those where a requester “demonstrates a compelling need”—such as “urgency to inform the public concerning actual or alleged Federal Government activity” if the requester is “primarily engaged in disseminating information,” 5 U.S.C. § 552(a)(6)(E)(i), (v)—and (ii) “in other cases determined by the agency,” *id.* § 552(a)(6)(E)(i), which, for the Department of Justice, include “[a] matter of widespread and exceptional media interest in which there exist possible questions about the government’s integrity which affect public confidence,” 28 C.F.R. § 16.5(e)(1)(ii), (iv). Both cases exist here.

² Responsive records should be construed as exclusive of records that is part of a noncitizen’s record of proceedings (e.g., a motion to dismiss).

³ Responsive records should be construed as exclusive of records that are part of a noncitizen’s record of proceedings (e.g., a motion to dismiss).

A. A MATTER OF WIDESPREAD AND EXCEPTIONAL INTEREST RAISING GOVERNMENT INTEGRITY CONCERNS

ICE arrests at and near immigration courts and immigration judges' dismissal of immigration cases to facilitate expedited removal are matters of widespread and exceptional media interest in which there exist possible questions about the government's integrity which affect public confidence.

Fifty articles on an issue make it a matter of widespread and exceptional public interest. *Citizens for Resp. & Ethics in Wash. v. U.S. DOGE Serv.*, Case No. 25-cv-511 (CRC), 2025 WL 752367, at *13 (D.D.C. Mar. 10, 2025) (hereinafter "CREW") see also *Brennan Ctr. for Just. v. Dep't of Com.* 498 F. Supp. 3d 87, 97 (D.D.C. 2020). A "handful of articles" also establishes such interest where the articles are "in a variety of publications" and "repeatedly reference the ongoing national discussion." *Am. Civ. Liberties Union v. Dep't of Just.*, 321 F. Supp. 2d 24, 32 (D.D.C. 2004).

Here, one hundred and twenty one articles in nationwide, state, local, and international media outlets have covered ongoing ICE arrests at or near immigration courts in Atlanta, Boston, Buffalo, Charlotte, Denver, Houston, Los Angeles, Miami, New York, Portland, Phoenix, Sacramento, San Diego, San Francisco, Seattle, and elsewhere throughout the country since May 20, 2025.⁴ This equates to almost two articles per day for sixty-six days.

⁴ Margaret Kadifa, *ICE Arrests All Adults Without Children at S.F. Immigration Court Today*, Mission Local (July 25, 2025, 1:05 PM), <https://missionlocal.org/2025/07/hed-ice-steps-up-arrests-at-s-f-immigration-court/> (hereinafter, "Kadifa re: Adult Arrests"); Pedro Camacho, *ICE Arrests Migrant Deemed Mentally Impaired by Judge as He Exits Immigration Court: 'He's Clearly Not Understanding the Questions'*, The Latin Times (July 25, 2025, 10:36 AM), <https://www.latintimes.com/ice-arrests-migrant-deemed-mentally-impaired-judge-he-exits-immigration-court-hes-clearly-not-587576>; Jordan Salama, *When ICE Agents Are Waiting Outside the Courtroom*, The New Yorker (July 25, 2025), <https://www.newyorker.com/news/the-lede/when-ice-agents-are-waiting-outside-the-courtroom>; Eileen Markey, *Punished for Playing by the Rules: The Deliberate Cruelty of Trump's Deportation Regime*, The Nation (July 24, 2025), <https://www.thenation.com/article/society/ice-trump-detention-regime-cruelty/>; Dean Moses, *ICE in Court: Feds Snatch More Immigrants as Lander, Williams Demand Safety Inspection of Detainment Center*, AMNY (July 23, 2025), <https://www.amny.com/politics/ice-immigrants-court-lander-williams-07232025/> (hereinafter, "Mose re: ICE in Court"); Danielle James, *ICE Arrests at Check-Ins, Court Hearings Are on the Rise. Michigan Is No Exception*, MLIVE (July 21, 2025, 7:10 AM), <https://www.mlive.com/politics/2025/07/ice-arrests-at-check-ins-court-hearings-are-on-the-rise-michigan-is-no-exception.html>; Margaret Kadifa, *ICE Agents Keep Snatching Asylum Seekers Immediately After Their Court Hearings*, Mother Jones (July 21, 2025), <https://www.motherjones.com/politics/2025/07/ice-agents-arrest-asylum-seekers-after-court-hearings-san-francisco/> (hereinafter, "Kadifa re: ICE Snatching"); Esmeralda Perez, *San Diego Immigration Attorney Weighs in on Lawsuit Challenging ICE Courthouse Arrests*, CBS8 (July 20, 2025, 10:19 PM), <https://www.cbs8.com/article/news/local/san-diego-attorney-weighs-in-on-lawsuit-challenging-ice-courthouse-arrests/509-79fec519-eb00-442c-b479-4522f423be7c>; Martha Bellisile et al., *Volunteers Flock to Immigration Courts to Support Migrants Arrested in the Hallways*, ABC News (July 20, 2025, 8:38 AM), <https://abcnews.go.com/US/wireStory/volunteers-flock-immigration-courts-support-migrants-arrested-hallways-123902561> (hereinafter "Bellisile et al. re: Volunteers Flock to Immigration Courts"); Eduardo Cuevas, *'Escalation: Federal Agents Now Detaining People with Active Immigration Cases'*, USA Today (July 18, 2025, 11:26 AM), <https://www.usatoday.com/story/news/nation/2025/07/18/migrants-immigration-court-trump-crackdown/84614161007/>; Mark Rivera et al., *ICE Arrests at Immigration Court in Chicago, Nationwide Labeled*

'Unlawful' in New Lawsuit, ABC 7 Chicago (July 18, 2025, 8:36 PM), <https://abc7chicago.com/post/us-immigration-news-ice-arrests-courts-chicago-nationwide-labeled-unlawful-new-lawsuit-trump-administration/17186490/>; Jeff Abbot, *Texas Based Immigration Advocacy Group Sues Trump Administration Over Courthouse Arrests*, El Paso Times (July 18, 2025, 5:02 AM), <https://www.elpasotimes.com/story/news/immigration/2025/07/18/texas-immigration-advocacy-group-challenges-ices-courthouse-arrests/85255298007/>; Emily Belz, *In Immigration Court, Christians Show Up to Fill the Back Benches*, Christianity Today (July 18, 2025), <https://www.christianitytoday.com/2025/07/immigration-court-observation-ice-arrests/>; David Baratz, *See How ICE Targets Immigrants Appearing at Routine Court Hearings*, USA Today (July 17, 2025, 3:15 PM), <https://www.usatoday.com/picture-gallery/news/nation/2025/07/17/how-ice-targets-immigrants-at-court-hearings-photos/85259555007/>; Martha Bellisile, *Homeland Security Officials Defend Immigration Court Arrests After Being Sued*, Associated Press (July 17, 2025, 2:04 PM), <https://apnews.com/article/ice-immigration-court-immigrants-a5190ada4a6019f84d76e62c11c44e30>; Swasti Singhai, *Five Days, 12 Arrests: A Week Inside San Diego Immigration Court*, Times of San Diego (July 17, 2025, 7:41 AM), <https://timesofsandiego.com/politics/2025/07/17/arrests-immigration-court-trump-anxiety-chaos/> (hereinafter, "Singhai re: Week at San Diego Immigration Court"); Devan Cole et al., *Trump Administration Sued Over ICE Arrests at Immigration Courthouses*, CNN (July 16, 2025, 6:23 PM), <https://www.cnn.com/2025/07/16/politics/ice-immigration-courthouse-arrests-lawsuit>; Luis Ferré-Sadurní, *Immigrants File Class-Action Lawsuit to Stop ICE Courthouse Arrests*, NY Times (July 16, 2025), <https://www.nytimes.com/2025/07/16/nyregion/trump-ice-arrests-lawsuit-immigrants.html> (hereinafter, "Ferré-Sadurní re: Lawsuit"); Maxine Bernstein, *Federal Judge in Oregon: Homeland Security 'Tricked' Asylum Seeker Before Arrest at Immigration Court*, The Oregonian (July 15, 2025, 10:47 AM), <https://www.oregonlive.com/pacific-northwest-news/2025/07/federal-judge-in-oregon-homeland-security-tricked-asylum-seeker-before-arrest-at-immigration-court.html>; Sarah Thamer, *Advocates Denounce ICE Arrests at Fort Snelling Immigration Court*, MPR News (July 15, 2025, 4:00 AM), <https://www.mprnews.org/story/2025/07/15/advocates-protest-ice-arrests-at-immigration-court>; Alex Baumhardt, *Asylum Seeker Taken by ICE Outside Portland Immigration Court to Be Immediately Released*, Oregon Capital Chronicle (July 14, 2025, 5:24 PM), <https://oregoncapitalchronicle.com/2025/07/14/asylum-seeker-taken-by-ice-outside-portland-immigration-court-to-be-immediately-released/>; Ciara Encinas, *Volunteers Describe How They Document ICE Arrests in Immigration Courts*, Fox 5 (July 11, 2025, 4:55 PM), <https://fox5sandiego.com/news/local-news/san-diego/san-diego-court-ice-arrests/>; Gerardo Zavala, *ICE Arrests Asylum Seeker After Sacramento Court Hearing*, CAPRADIO (July 11, 2025), <https://www.capradio.org/articles/2025/07/11/ice-arrests-asylum-seeker-after-sacramento-court-hearing/>; Paige Browning & John O'Brien, *Fears of Arrests Cause Tension at Seattle Immigration Court*, KUOW (July 10, 2025, 5:58 PM), <https://www.kuow.org/stories/fears-of-ice-arrests-cause-tension-at-seattle-immigration-court/>; Margaret Kadifa, *ICE Arrests 4 People After Immigration Court Hearings in San Francisco*, Mission Local (July 10, 2025, 12:08 PM), <https://missionlocal.org/2025/07/ice-arrests-four-people-after-they-appear-in-immigration-court/> (hereinafter, "Kadifa re: 4 Arrests"); *What Goes On in America's Immigration Courts*, Economist (July 10, 2025), <https://www.economist.com/united-states/2025/07/10/what-goes-on-in-americas-immigration-courts> (hereinafter "Economist"); Francesca Regalado & Soumya Karlamangla, *Tensions Escalate in San Francisco over Immigration Enforcement*, NY Times (July 9, 2025), <https://www.nytimes.com/2025/07/09/us/ice-immigration-protest-san-francisco.html>; John Ramos, *Peruvian Women Detained by ICE in San Francisco Freed After Judge's Ruling*, CBS News (July 8, 2025, 6:35 PM), <https://www.cbsnews.com/sanfrancisco/news/san-francisco-ice-woman-freed-immigration-court/>; Tom Li & Ko Lyn Cheang, *Video: Protestors Cling to Departing ICE Van After Arrest at S.F. Immigration Court*, San Francisco Chronicle (July 8, 2025, 5:34 PM), <https://www.sfchronicle.com/sf/article/protesters-cling-ice-van-chaos-immigration-court-20761721.php>; Henry Rosoff, *ICE Escalates Immigration Court Arrests Outside NYC Court*, PIX11 (July 8, 2025, 5:18 PM), <https://pix11.com/news/local-news/manhattan/ice-escalates-immigration-arrests-outside-nyc-court/>; Sabrina Tavernise, *Against Illegal Immigration, but Married to Someone Here Illegally*, NY Times (July 8, 2025), <https://www.nytimes.com/2025/07/08/us/trump-illegal-immigration-raids-arkansas.html>; Nisa Khan, *When ICE Is Waiting at Immigration Court, What Can Advocates Do?*, KQED (July 7, 2025), <https://www.kqed.org/news/12047018/how-legal-experts-advocates-are-responding-to-the-detention-of-asylum->

[seekers](#); Emma Seiwel, *ICE Opposition Grows, With Lawmakers, Attorneys Decrying Courthouse Arrests as a Violation of Due Process*, NY Daily News (July 5, 2025, 6:00 AM), <https://www.nydailynews.com/2025/07/05/ice-opposition-grows-with-lawmakers-attorneys-decrying-courthouse-arrests-a-violation-of-due-process/> (hereinafter “Seiwel re: ICE Opposition Grows”); Jenna DeAngelis, *NYC Officials Lead “ICE Watch And Accompaniment” Effort at Federal Immigration Court. Here’s What It Means*, CBS News (July 3, 2025, 6:59 PM), <https://www.cbsnews.com/newyork/news/nyc-ice-watch-federal-immigration-court/>; Jim Vertuno, *Honduran Family Freed From Detention After Lawsuit Against ICE Courthouse Arrests*, Associated Press (July 3, 2025, 6:14 PM), <https://apnews.com/article/ice-family-children-lawsuit-release-ef8d764aebec8ba1b67bafc9080a563d>; Swasti Singhai, *San Diego Volunteers Bear Witness Daily as ICE Continues Courtroom Arrests*, Times of San Diego (July 3, 2025, 3:41 PM), <https://timesofsandiego.com/life/2025/07/03/san-diego-community-bears-witness-as-ice-continues-courtroom-arrests/> (hereinafter, “Singhai re: Volunteers”); Emma Seiwel, *ICE Agents Now Snatching Migrants With Open Court Cases; NY Officials, Lawyers Say It’s ‘Utterly Unlawful’*, NY Daily News (July 3, 2025, 6:50 AM), <https://www.nydailynews.com/2025/07/02/ice-agents-now-snatching-migrants-with-open-court-cases-nyc-officials-lawyers-say-its-utterly-unlawful/> (hereinafter “Seiwel re: ICE Snatching”); Shelby Bremer, *Lawsuit Over San Diego Immigration Court Arrest May Give Insight Into ICE Practices*, NBC San Diego (July 2, 2025, 6:01 PM), <https://www.nbcsandiego.com/news/local/san-diego-lawsuit-ice-courthouse-arrests/3861107/>; Melissa Gomez, *Faith Leaders Bear Witness as Migrants Make Their Case in Immigration Court*, Los Angeles Times (July 2, 2025, 3:00 AM), <https://www.latimes.com/california/story/2025-07-02/faith-leaders-bear-witness-as-migrants-make-their-case-immigration-court> (hereinafter, “Gomez re: Faith Leaders”); Madeleine May & Hannah Marr, *Afghan Ally Detained by ICE After Attending Immigration Court Hearing*, CBS News (July 1, 2025, 1:48 PM), <https://www.cbsnews.com/news/afghan-ally-detained-by-ice-immigration-court/>; Margaret Kadifa, *For One S.F. Asylum Seeker, ICE Arrest Meant Move to More Conservative Judge*, Mission Local (July 1, 2025, 4:00 AM), <https://missionlocal.org/2025/07/sf-asylum-seeker-immigration-judge-ice-arrest/> (hereinafter “Kadifa re: Forum Shopping”); Dean Moses, *ICE Raids Continue in Lower Manhattan Court as Immigrant Advocates Rail Against ‘Trump’s Personal Army’*, AMNY (July 1, 2025), <https://www.amny.com/news/ice-raids-lower-manhattan-court-trump-07012025/> (hereinafter, “Moses re: ICE Raids”); Natali Yahr, *Wisconsin Asylum Seeker Miguel Robles Detained in Unprecedented Wave of Courthouse Arrests*, Racine County Eye (July 1, 2025), <https://racinecountyeve.com/2025/06/30/miguel-robles-immigration-asylum/>; Gwynne Hogan, *He Fled Death Threats for Being Gay, Applied for Asylum and Married a U.S. Citizen. ICE Arrested Him Anyway*, The City (June 30, 2025, 1:41 PM), <https://www.thecity.nyc/2025/06/27/ice-arrested-asylum-gay/> (hereinafter “Hogan re: Mamadou Arrest”); Ko Lyn Cheang, *S.F. Drag Performer Detained by ICE After Asylum Hearing*, San Francisco Chronicle (June 28, 2025), <https://www.sfchronicle.com/sf/article/drag-performer-detained-ice-20399122.php>; Anna-Cat Brigida, *A Legal Trap? Why the Trump Administration is Targeting Immigration Courts for Arrests*, Al Jazeera (June 27, 2025), <https://www.aljazeera.com/news/longform/2025/6/27/why-the-trump-administration-is-targeting-immigration-courts-for-arrests>; Julia Marnin, *6-Year-Old Boy with Leukemia Arrested by ICE is Now Detained in Texas, Suit Says*, Fort Worth Star-Telegram (June 26, 2025, 3:23 PM), <https://www.star-telegram.com/news/state/texas/article309472695.html>; Dan Katz, *ICE Arrested a 6-Year-Old Boy with Leukemia at Immigration Court. His Family is Suing*, Texas Public Radio (June 25, 2025, 11:06 PM), <https://www.tpr.org/border-immigration/2025-06-25/ice-arrested-a-6-year-old-boy-with-leukemia-at-immigration-court-his-family-is-suing>; Junyao Yang, *Tracking Every ICE Action in San Francisco So Far*, Mission Local (June 25, 2025, 11:30 AM), <https://missionlocal.org/2025/06/sf-ice-arrests-tracker/>; Luis Ferré-Sadurní, *They Had Come to Graduate. Their Minds Were on a Student Held by ICE*, NY Times (June 25, 2025), <https://www.nytimes.com/2025/06/25/nyregion/immigrant-students-graduation-ice.html>; Nina Shapiro, *As Pushback Grows to WA Immigration Court Arrests, ICE Changes Tactics*, The Seattle Times (June 24, 2025, 6:00 AM), <https://www.seattletimes.com/seattle-news/as-pushback-grows-to-wa-immigration-court-arrests-ice-changes-tactics/> (hereinafter “Shapiro re: ICE Tactic Change”); Kate Morrissey, *Here’s What’s Happening to the People ICE Arrests in Immigration Court*, Capital & Main (June 24, 2025), <https://capitalandmain.com/heres-whats-happening-to-the-people-ice-arrests-in-immigration-court>; Elizabeth L.T. Moore & Elizabeth Zavala, *Obscure San Antonion Court Becomes Flashpoint in Immigration Debate*, San Antonio Express-News (June 23, 2025),

<https://www.expressnews.com/news/article/obscure-san-antonio-immigration-court-spotlight-20381608.php>; Ray Sanchez & Allsha Ebrahimji, *Masked Ice Officers: The New Calling Card of The Trump Administration's Crackdown*, CNN (June 21, 2025), <https://www.cnn.com/us/ice-immigration-officers-face-masks>; Ken Stone, *ICE Agents Scatter As SD Bishop Pham, Other Clergy Visit Immigration Court*, Times of San Diego (June 20, 2025, 3:04 PM), <https://timesofsandiego.com/life/2025/06/20/ice-agents-scatter-as-sd-bishop-pham-other-clergy-visit-immigration-court/>; Luis Ferré-Sadurní, *Brad Lander Tried to Escort Immigrants facing Arrest. He's Not Alone*, NY Times (June 19, 2025), <https://www.nytimes.com/2025/06/19/nyregion/ice-immigrants-volunteer-escorts-courthouse.html> (hereinafter "Ferré-Sadurní re: Lander Escort"); Luis Ferré-Sadurní, *Brad Lander is Arrested by ICE Agents at Immigration Courthouse*, NY Times (June 17, 2025), <https://www.nytimes.com/2025/06/17/nyregion/brad-lander-immigration-ice.html> (hereinafter "Ferré-Sadurní re: Lander Arrest"); <https://www.krgv.com/news/ice-detains-three-people-outside-harlingen-immigration-court/>; Lily Celeste, *ICE Detains Three People Attending Their Immigration Hearings in Harlingen*, KRGV.Com (June 15, 2025, 6:40 PM), <https://www.krgv.com/news/ice-detains-three-people-outside-harlingen-immigration-court/>; Stephen Hobbs, *In Sacramento's Immigration Court, ICE Detention Threats Leave Residents in Limbo*, The Sacramento Bee (June 14, 2025, 10:05 AM), <https://www.sacbee.com/news/politics-government/capitol-alert/article308346910.html> (hereinafter "Hobbs re: Sacramento Immigr. Ct. Arrests"); David Manoucheri, *ICE Agents Wait at Immigration Court in Sacramento for 2d Consecutive Day, Take Someone Into Custody*, KCRA3 (June 12, 2025, 2:53 PM), <https://www.kcra.com/article/ice-agents-immigration-court-sacramento-custody/65049263>; Ryan Oehrli, *'Rigged'? ICE Agents Are Arresting People at Charlotte's Immigration Court*, The Charlotte Observer (June 12, 2025, 11:31 AM), <https://www.charlotteobserver.com/news/local/crime/article308209165.html>; Thomas Lyons, *Mood is Tense at Concord Immigration Court Following ICE Arrests*, Berkleyside (June 12, 2025, 9:55 AM), <https://www.berkeleyside.org/2025/06/12/concord-immigration-court-tension-after-ice-arrests>; Ida Domingo, *ICE Arrests 10 at Sterling, Virginia Immigration Court During Enforcement Operation*, ABC 7 News (June 12, 2025, 6:13 AM), <https://wjla.com/news/local/ice-arrests-10-people-sterling-virginia-immigration-court-agents-detain-enforcement-deportation-salvadoran-venezuelan-peruvian-noncitizens-operation-fairfax-county-courtroom-photos-video-homeland-security-trump-administration-illegal>; Armando Garcia, *Immigrant Rights Group Say ICE Officers 'Ambush Noncitizens' in Courthouse Arrests, Ask Judge to Intervene*, ABC News (June 12, 2025, 10:32 AM), <https://abcnews.go.com/US/immigrant-rights-groups-ice-officers-ambush-noncitizens-courthouse/story?id=122770040>; Ximena Bustillo, *ICE's Novel Strategy Allows for More Arrests from Inside Immigration Courts*, NPR (June 12, 2025, 5:02 AM), <https://www.npr.org/2025/06/12/nx-s1-5409403/trump-immigration-courts-arrests>; *ICE Arrests People at the Annandale Immigration Court*, Annandale Today (June 12, 2025), <https://annandaletoday.com/ice-arrests-people-at-the-annandale-immigration-court/>; Hanna Pampaloni, *ICE Makes Arrests at Sterling Immigration Court*, Loudoun Now (June 12, 2025), https://www.loudounnow.com/news/ice-makes-arrests-at-sterling-immigration-court/article_f8f7118c-aca1-4a8d-ad6e-99826fa77eb6.html; Luis Ferré-Sadurní, *Inside a Courthouse, Chaos and Tears as Trump Accelerates Deportations*, NY Times (June 12, 2025), <https://www.nytimes.com/2025/06/12/nyregion/immigration-courthouse-arrests-trump-deportation.html> (hereinafter "Ferré-Sadurní re: Inside NYC Immigr. Cts."); Carolina Estrada, *Two Men Detained by ICE After Sacramento Immigration Court Hearings*, KCRA3 (June 11, 2025, 11:13 PM), <https://www.kcra.com/article/two-men-detained-by-ice-sacramento-immigration-hearings/65041264> (hereinafter, "Estrada re: Two Arrests"); Stephen Hobbs, *Two Men Handcuffed at Sacramento Immigration Court, Taken to ICE Office*, The Sacramento Bee (June 11, 2025, 6:09 PM), <https://www.sacbee.com/news/politics-government/capitol-alert/article308401280.html>; Martha Bellisile et al., *Immigration Officers Intensify Arrests in Courthouse Hallways on a Fast Track to Deportation*, Associated Press (June 11, 2025, 4:17 PM), <https://apnews.com/article/immigration-court-arrests-ice-deportation-99d822cdc93ae7dc26026c27895d5ea1> (hereinafter "Bellisile et al. re: Immigration Officers Intensify Arrests"); Brittany Taylor et al., *Second Day of Arrests by ICE Agents at Immigration Court in Southwest Houston*, Click 2 Houston.com (June 11, 2025, 10:25 AM), <https://www.click2houston.com/news/local/2025/06/11/ice-agents-stationed-outside-immigration-court-in-houstons-greenpoint-area/>; Hamed Aleaziz, *Under Pressure From the White House, ICE Seeks New Ways to Ramp Up Arrests*, NY Times (June 11, 2025), <https://www.nytimes.com/2025/06/11/us/politics/ice-la-protest-arrests.html>; Priscilla Alvarez, *ICE Protest Nationwide Comes As Agency Scrambles to Meet Trump's*

Immigration Arrest Quotas, CNN (June 10, 2025, 10:16 PM), <https://www.cnn.com/2025/06/10/politics/ice-scrambles-immigration-arrest-quotas>; Conrad Wilson, *ICE Arrests 2 More Asylum Seekers at Immigration Court in Portland*, OPB (June 10, 2025, 5:12 PM), <https://www.opb.org/article/2025/06/10/ice-arrests-2-more-asylum-seekers-at-immigration-court-in-portland/> (hereinafter, “Wilson re: Two Arrests”); Margaret Kadifa et al., *S.F. Immigration Court Shuts Down After ICE Protests, Arrests*, Mission Local (June 10, 2025, 12:43 PM), <https://missionlocal.org/2025/06/video-ice-agents-arrest-people-outside-s-f-courthouse/>; Ninfa Saavedra & Robert Arnold, *ICE Arrests Multiple People at Houston’s Immigration Court*, Click2Houston.com (June 10, 2025, 2:48 PM), <https://www.click2houston.com/news/local/2025/06/10/ice-arrests-reportedly-underway-at-houstons-immigration-court/>; Natalie Weber, *ICE Detains Multiple Men at Houston Immigration Courthouse, Civil Rights Organization Says*, Houston Public Media (June 10, 2025, 11:58 AM), <https://www.houstonpublicmedia.org/articles/news/politics/immigration/2025/06/10/523600/ice-detains-multiple-men-at-houston-immigration-courthouse/>; Giulia McDonnell Nieto del Rio, *This Is What An ICE Arrest in Boston Immigration Court Looks Like*, Boston Globe (June 9, 2025, 6:31 AM), <https://www.bostonglobe.com/2025/06/09/metro/ice-arrests-at-boston-immigration-court/> (hereinafter, “Nieto del Rio re: Inside Boston Immigr. Ct. Arrest”); Audrey Conklin & Bill Melugin, *Trump’s ICE Launches Bold Courthouse Migrant Arrest Strategy to Fast-Track Deportations Biden Avoided*, Fox News (June 9, 2025, 4:00 AM), <https://www.foxnews.com/us/trumps-ice-launches-bold-courthouse-migrant-arrest-strategy-fast-track-deportations-biden-avoided?msocid=1cd283b1756f61231883976574c46057>; Conrad Wilson, *ICE Detains Another Asylum-Seeker Outside Portland Courtroom, Legal Petition Says*, OPB (June 6, 2025, 9:30 AM), <https://www.opb.org/article/2025/06/06/asylum-arrest-portland-yzlh/> (hereinafter “Wilson re: Arrest”); Michael Elsen-Rooney, *Their Student Was Detained by ICE. Now this Bronx School is Rallying to Get Him Back*, Chalkbeat New York (June 5, 2025, 7:33pm), <https://www.chalkbeat.org/newyork/2025/06/05/nyc-student-detained-by-ice-supported-by-ellis-prep-bronx-school-community/>; Bennett Haerberle, *In Chicago & Elsewhere, ICE Increases Enforcement in Immigration Court*, 5 Chicago (June 5, 2025, 5:54 PM), <https://www.nbcchicago.com/investigations/in-chicago-and-elsewhere-ice-increases-enforcement-in-immigration-court/3761730/>; Megan Ulu-Lani Boyanton, *At Least Eight People Detained at Denver Immigration Court as ICE Presence Increases, Advocates Say*, The Denver Post (June 5, 2025, 5:04 PM), <https://www.denverpost.com/2025/06/05/denver-immigration-court-arrests-ice-trump-advocates/>; Amy Larson, *Newlywed Couple Separated at Immigration Courthouse by ICE*, The Hill (June 5, 2025, 1:14 PM), <https://thehill.com/homenews/state-watch/5334753-immigration-courthouse-ice-trump-dhs/>; Laura Romero et al., *In a New Tactic, ICE Is Arresting Migrants at Immigration Courts, Attorneys Say*, ABC News (June 4, 2025, 6:37 PM), <https://abcnews.go.com/US/new-tactic-ice-arresting-migrants-immigration-courts-attorneys/story?id=122513021>; Julie Carey, *Cancel, Arrest, Deport: Immigration Lawyer Warns of Emerging ICE Tactic*, NBC Washington (June 4, 2025, 3:01 PM), <https://www.nbcwashington.com/news/local/cancel-arrest-deport-immigration-lawyer-warns-of-emerging-ice-tactic/3927509/>; Brad Schmidt, *Immigration Arrest at Courthouse Marks First for Portland*, The Oregonian (June 3, 2025, 3:22 PM), <https://www.oregonlive.com/politics/2025/06/immigration-arrest-at-courthouse-marks-first-for-portland.html>; Stephen Franklin & Katema Hosseini, *ICE Target Noncitizens As Cases Dismissed in Immigration Court in Chicago*, Borderless (June 3, 2025), <https://borderlessmag.org/2025/06/03/ice-arrests-chicago-immigration-court-trump-detention-immigration-custom-enforcement/>; Conrad Wilson, *ICE Detains Asylum Seeker Outside Portland Immigration Court, Lawyers Say*, OPB (June 2, 2025, 11:01 PM), <https://www.opb.org/article/2025/06/02/ice-immigration-enforcement-detains-asylum-seeker-portland-court/> (hereinafter, “Wilson re: Initial Arrest”); Angélica Franganillo Díaz & Priscilla Alvarez, *ICE Targets Migrants for Arrest at Courthouses as Trump Administration Intensifies Deportation Push*, CNN (June 2, 2025, 5:00 AM), <https://www.cnn.com/2025/06/02/politics/ice-arrests-migrants-courthouse/>; Shelly Bradbury, *Feds Detain Immigrant Family at Denver Courthouse Amid New Trump Strategy*, Denver Post (May 30, 2025, 3:32 PM), <https://www.denverpost.com/2025/05/30/denver-immigration-arrest-courthouse-ice-trump/>; Giulia McDonnell Nieto del Rio, *ICE Arrests at Massachusetts Immigration Courts Target Immigrants Seeking Permission to Stay in US*, Boston Globe (May 30, 2025, 1:39PM), <https://www.bostonglobe.com/2025/05/27/metro/immigration-courts-ice-arrests-massachusetts> (hereinafter, “Nieto del Rio re: Boston Immigr. Ct. Arrests”); Suzanne Gamboa, *Immigration*

Arrests in Courthouses Have Become the New Deportation Tool, Stripping Migrants of a Legal Process, NBC News (May 30, 2025, 5:00 AM), <https://www.nbcnews.com/news/latino/immigrations-arrests-ice-deportations-courthouse-legal-process-ice-rcna209671>; Hamed Aleaziz et al., *How ICE is Seeking to Ramp Up Deportations Through Courthouse Arrests*, NY Times (May 30, 2025), <https://www.nytimes.com/2025/05/30/us/politics/ice-courthouse-arrests.html>; Carolina Estrada, *'This is Very Concerning': 3 Arrested While Attending Hearings at Immigration Court in Sacramento, Groups Say*, KCRA3 (May 29, 2025, 1:37 PM), <https://www.kcra.com/article/sacramento-immigration-court-arrests-ice/64920625>; Allison Sherry, *Signaling a Policy Shift, ICE Detains a Family Who Showed Up at Denver Immigration Court for a Check-In*, CPR News (May 29, 2025, 1:35 PM), <https://www.cpr.org/2025/05/29/ice-detains-family-denver-immigration-court/>; Daniel Gonzalez & Richard Ruelas, *After Short Break, ICE Resumes Arrests at Phoenix Immigration Court, Changes Keep Tactic*, AZ Central (May 29, 2025, 5:01 AM), <https://www.azcentral.com/story/news/politics/immigration/2025/05/29/phoenix-immigration-court-ice-arrests-resume/83767918007/>; Gwynne Hogan, *Migrants, Protestors, and a Pastor Arrested Inside and Outside Manhattan Immigration Courthouses*, The City (May 28, 2025, 3:16 PM), <https://www.thecity.nyc/2025/05/28/ice-arrests-migrants-26-federal-plaza-pastor/>; (hereinafter, "Hogan re: NYC Immigr. Ct. Arrests"); Olivia Hebert, *ICE Stormed SF Court to Arrest 4 Asylum Seekers, Denounced as Unlawful*, SF Gate (May 28, 2025), <https://www.sfgate.com/bayarea/article/asylum-seekers-arrested-ice-san-francisco-20349387.php>; Tomoki Chien, *Undercover ICE Agents Begin Making Arrests at SF Immigration Court*, The San Francisco Standard (May 27, 2025, 5:32 PM), <https://sfstandard.com/2025/05/27/undercover-ice-agents-make-arrests-san-francisco-court/>; Luis Ferré-Sadurní & Dana Rubinstein, *ICE, Shifting Tactics, Detains High School Student at N.Y.C. Courthouse*, NY Times (May 27, 2025), <https://www.nytimes.com/2025/05/27/nyregion/new-york-student-arrested-ice.html>; Michael Elsen-Rooney, *A Bronx High Schooler Showed Up for a Routine Immigration Court Date. ICE Was Waiting*, Chalkbeat New York (May 26, 2025, 8:35 pm), <https://www.chalkbeat.org/newyork/2025/05/27/bronx-high-school-student-detained-by-immigration-ice-agents/?ref=hellgatenyc.com>; Milena Malaver et al., *ICE Agents in Miami Find New Spot to Carry Out Arrests: Immigration Court*, Miami Herald (May 26, 2025, 1:27 PM), <https://www.miamiherald.com/news/local/immigration/article306900486.html>; Melissa Gomez, *Father Ripped from Family as Agents Target Immigration Courts, Arresting People After Cases Dismissed*, LA Times (May 24, 2025, 10:00AM), <https://www.latimes.com/california/story/2025-05-24/ice-agents-swarm-immigration-courts-arresting-people-after-cases-dismissed> (hereinafter, "Gomez re: Immigr. Ct. Arrests"); Tyche Hendricks, *'Unprecedented': ICE Officers Operating Inside Bay Area Immigration Courts, Lawyers Say*, KQED (May 24, 2025), <https://www.kqed.org/news/12041473/unprecedented-ice-officers-operating-inside-bay-area-immigration-courts-lawyers-say>; Ted Hesson & Kristina Cooke, *ICE Arrests Migrants at Courthouses, Opens Door to Fast-Track Deportations*, Reuters (May 23, 2025, 4:35PM), <https://www.reuters.com/world/us/ice-arrests-migrants-courthouses-opens-door-fast-track-deportations-2025-05-23/>; Camilo Montoya-Galvez & Nidia Cavazos, *ICE Ending Migrants' Court Cases In Order to Arrest and Move to Deport Them*, CBS News (May 23, 2025, 9:53 AM), <https://www.cbsnews.com/news/ice-ending-migrants-court-cases-arrest-move-to-deport-them/>; Arelis R. Hernández & Maria Sacchetti, *Immigrant Arrests at Courthouses Signal New Tactic in Trump's Deportation Push*, Washington Post (May 23, 2025), <https://www.washingtonpost.com/immigration/2025/05/23/immigration-court-arrests-ice-trump/>; Gustavo Solis, *ICE Agents Swarm San Diego Immigration Court, Arresting People After Their Hearings*, KPBS (May 22, 2025, 5:45PM), <https://www.kpbs.org/news/border-immigration/2025/05/22/ice-agents-swarm-san-diego-immigration-court-arresting-people-after-their-hearings>; Trevor Hughes, *ICE Agents Deploy New Tactic: Arresting People As They Leave Mandatory Court Hearings*, USA Today (May 22, 2025, 1:13 PM), <https://www.usatoday.com/story/news/nation/2025/05/22/ice-arrests-immigration-court-deportation-tactics/83792357007/>; Joshua Goodman et al., *They Came to Hearing at Chicago's Immigration Court, Then Got Arrested*, Chicago Sun-Times (May 22, 2025, 3:59PM), <https://chicago.suntimes.com/immigration/2025/05/22/ice-agents-hallways-immigration-court-trump-mass-arrest>; Anders Hagstrom & Bill Melugin, *ICE Begins New, Nationwide Effort to Arrest Illegal Aliens at Immigration Hearings* (May 22, 2025, 1:07 PM), <https://www.foxnews.com/politics/ice-begins-new-nationwide-effort-arrest-illegal-aliens-immigration-hearings>; Joshua Goodman & Gisela Salomon, *ICE Agents Wait in Hallways of Immigration Court as Trump Seeks to Deliver on Mass Arrest Pledge*, Associated Press (May 22, 2025, 1:30 AM), <https://apnews.com/article/immigration-courts-arrests-trump-ice-deportations->

Much of the coverage express doubts about the integrity of ICE arrests at immigration courts, describing them as a due process violation and/or a tactic to increase deportations, forum shop, and scare noncitizens into giving up on their immigration cases.⁵ Several editorials also decry the arrests as a “set up” and for disregarding due process.⁶

[fa96435d4ec021cc8ff636b23d80d848](https://www.investigativepost.org/2025/05/22/ice-raids-immigration-court-in-buffalo/); J. Dale Shoemaker, *ICE Raids Immigration Court in Buffalo*, Investigative Post (May 22, 2025), <https://www.investigativepost.org/2025/05/22/ice-raids-immigration-court-in-buffalo/>; Raphael Romero Ruiz et al., *For 2nd Day, People Attending Phoenix Immigration Hearings Arrested by ICE*, USA Today (May 21, 2025, 11:42 PM), <https://www.usatoday.com/story/news/politics/immigration/2025/05/21/ice-arrests-phoenix-immigration-court/83772323007/?gnt-cfr=1&gca-cat=p>; Gustavo Sagrero Álvarez, *ICE Agents at Seattle Courthouse Arrest People Whose Deportation Hearings are Dismissed*, KUOW (May 21, 5:45 PM), <https://www.kuow.org/stories/ice-agents-at-seattle-courthouse-arrest-people-whose-deportation-hearings-are-dismissed>; Akela Lacy et al. *ICE Agents Are Camped Outside Immigration Courts to Make Arrests*, The Intercept (May 21, 2025, 3:27 PM), <https://theintercept.com/2025/05/21/ice-agents-courts-arrests-immigrants-deport/>; Paul Ingram, *'Mayhem' As ICE Officials Arrest Multiple People at Immigration Court in Phoenix*, AZ Mirror (May 21, 2025, 11:12 AM), <https://azmirror.com/2025/05/21/mayhem-as-ice-officials-arrest-multiple-people-at-immigration-court-in-phoenix/>; Nina Shapiro, *ICE Arrests at WA Immigration Court Spark Fear of Fast-Track Removal*, Seattle Times (May 21, 2025, 6:00 AM), <https://www.seattletimes.com/seattle-news/law-justice/ice-arrests-at-wa-immigration-court-spark-fear-of-fast-track-removal/> (hereinafter, “Shapiro re: ICE Arrests”); Raphael Romero Ruiz & Richard Ruelas, *They Showed Up to Immigration Court in Phoenix. Then Agents Surrounded Them*, USA Today (May 20, 2025), <https://www.usatoday.com/story/news/politics/immigration/2025/05/20/prosecutors-drop-charges-vs-migrants-as-border-agents-wait-outside/83756994007/?gnt-cfr=1&gca-cat=p>

⁵ Kadifa re: Adult Arrests, *supra* n. 4; Salama, *supra* n. 4; Markey, *supra* n. 4; Mose re: ICE in Court; James, *supra* n. 4; Bellisile et al. re: Volunteers Flock to Immigration Courts, *supra* n. 4; Bellisile, *supra* n. 4; Cole et al., *supra* n. 4; Ferré-Sadurní re: Lawsuit, *supra* n. 4; Rivera et al., *supra* n. 4; Cuevas, *supra* n. 4; Abbot, *supra* n. 4; Bernstein, *supra* n. 4; Thamer, *supra* n. 4; Browning & O’Brien, *supra* n. 4; Economist, *supra* n. 4; Ramos, *supra* n. 4; Li & Cheang, *supra* n. 4; Tavernise, *supra* n. 4; Khan, *supra* n. 4; DeAngelis, *supra* n. 4; Seiwel re: ICE Opposition Grows, *supra* n. 4; Singhai re: Volunteers, *supra* n. 4; Kadifa re: Forum Shopping, *supra* n. 4; Moses re: ICE Raids, *supra* n. 4; Yahr, *supra* n. 4; Hogan re: Mamadou Arrest, *supra* n. 4; Cheang, *supra* n. 4; Brigida, *supra* n. 4; Katz, *supra* n. 4; Morrissey, *supra* n. 4; Moore & Zavala, *supra* n. 4; Hobbs re: Sacramento Immigr. Ct. Arrests, *supra* n. 4; Lyons, *supra* n. 4; Oehrli, *supra* n. 4; Bustillo, *supra* n. 4; Bellisile et al. re: Immigration Officers Intensify Arrests, *supra* n. 4; Wilson re: Two Arrests, *supra* n. 4; Kadifa et al., *supra* n. 4; Nieto del Rio re: Inside Boston Immigr. Ct. Arrest, *supra* n. 4; Conklin & Melugin, *supra* n. 4; Wilson re: Arrest, *supra* n.14; Romero et al., *supra* n.14; Carey, *supra* n. 4; Franklin & Hosseini, *supra* n. 4; Bradbury, *supra* n. 4; Nieto del Rio re: Boston Immigr. Ct. Arrests, *supra* n. 4; Gamboa, *supra* n. 4; Aleaziz et al., *supra* n. 4; Gonzalez & Ruelas, *supra* n. 4; Hebert, *supra* n. 4; Chien, *supra* n. 4; Elsen-Rooney re: Dylan Arrest, *supra* n. 4; Malaver et al., *supra* n. 4; Gomez re: Immigr. Ct. Arrests, *supra* n. 4; Hernández & Sacchetti, *supra* n. 4; Solis, *supra* n. 4; Hughes, *supra* n. 4; Goodman et al., *supra* n. 4; Goodman & Salomon, *supra* n. 4; Shoemaker, *supra* n. 4; Ruiz et al., *supra* n. 4; Álvarez, *supra* n. 4; Lacy et al., *supra* n. 4; Ingram, *supra* n. 4; Shapiro re: ICE Arrests, *supra* n. 4; Seiwel re: ICE Snatching, *supra* n. 4; Hendricks, *supra* n. 4; Schmidt, *supra* n. 4.

⁶ Veronica Cardenas, *I Was Once an ICE Prosecutor. What I See Now in Immigration Courts Is Disturbing*, The Hill (July 17, 2025, 8:00AM), <https://thehill.com/opinion/immigration/5404863-i-was-once-an-ice-prosecutor-what-i-see-now-in-immigration-courts-is-disturbing/>; Brian Strassburger, S.J. & William Critchley-Menor, S.J., *What We Saw During An ICE Arrest & Immigration Court Hearing: The Breakdown of Justice in America*, America: The Jesuit Review (July 11, 2025), <https://www.americamagazine.org/politics-society/2025/07/11/ice-immigration-court-deportation-injustice-251119>; *Trump Disregards Due Process in Our Nation’s Immigration Courts*, San Antonio Express-News (June 27, 2025), <https://www.expressnews.com/opinion/editorial/article/ice-arrest-immigration-court-texas-20395342.php>; *Masked ICE Arrests Raise Urgent Questions About U.S. Immigration Practices*, The Riverdale Press (June 26, 2025), <https://www.riverdalepress.com/stories/masked-ice-arrests-raise-urgent-questions-about-us-immigration-practices.187060>.

Similarly, eighty-five articles in state, local, and nationwide media outlets have discussed ICE asking immigration judges to dismiss noncitizens' immigration cases so it can pursue these noncitizens' expedited removal.⁷ Immigration attorneys also report ICE officials serving pre-signed dismissals based on "non-opposition" to noncitizen respondents at immigration courts without respondents not having notice of ICE's motion to dismiss their immigration case and an opportunity to oppose it. Much of the coverage on these dismissals casts doubt on their integrity, describing them as a violation of due process and a tactic to deport noncitizens without hearings.⁸ Some coverage even suggests that EOIR is firing immigration judges for refusing to dismiss cases.⁹

⁷ Kadifa re: Adult Arrests, *supra* n. 4; Camacho, *supra* n. 4; Salama, *supra* n. 4; Maurice DuBois et al., *3 Immigration Judges Speak Out About Their Firings: "It Was Arbitrary, Unfair*, CBS News (July 24, 2025, 8:34 PM), <https://www.cbsnews.com/boston/news/immigration-judges-speak-out-firings-arbitrary-unfair/?intcid=CNM-00-10abd1h>; James, *supra* n. 4; Kadifa re: ICE Snatching, *supra* n. 4; Bellisile et al. re: Volunteers Flock to Immigration Courts, *supra* n. 4; Rivera et al., *supra* n. 4; Cuevas, *supra* n. 4; Bellisile, *supra* n. 4; Singhai re: Week at San Diego Immigration Court, *supra* n. 4; Cole et al., *supra* n. 4; Ferré-Sadurní re: Lawsuit, *supra* n. 4; Bernstein, *supra* n. 4; Thamer, *supra* n. 4; Browning & O'Brien, *supra* n. 4; Kadifa re: 4 Arrests, *supra* n. 4; Economist, *supra* n. 4; Regalado & Karlamangla, *supra* n. 4; Li & Cheang, *supra* n. 4; Khan, *supra* n. 4; Seiwel re: ICE Opposition Grows, *supra* n. 4; Vertuno, *supra* n. 4; Seiwel re: ICE Snatching, *supra* n. 4; Gomez re: Faith Leaders, *supra* n. 4; Bremer, *supra* n. 4; May & Marr, *supra* n. 4; Kadifa re: Forum Shopping, *supra* n. 4; Yahr, *supra* n. 4; Hogan re: Mamadou Arrest, *supra* n. 4; Cheang, *supra* n. 4; Brigida, *supra* n. 4; Marnin, *supra* n. 4; Katz, *supra* n. 4; Shapiro re: ICE Tactic Change, *supra* n. 4; Morrissey, *supra* n. 4; Moore & Zavala, *supra* n. 4; Ferré-Sadurní re: Lander Escort, *supra* n. 4; Celeste, *supra* n. 4; Oehrli, *supra* n. 4; Garcia, *supra* n. 4; Lyons, *supra* n. 4; Bustillo, *supra* n. 4; Ferré-Sadurní re: Inside NYC Immigr. Cts., *supra* n. 4; Bellisile et al. re: Immigration Officers Intensify Arrests, *supra* n. 4; Taylor et al., *supra* n. 4; Julia Ainsely, *Trump Admin Tells Immigration Judges to Dismiss Cases in Tactic to Speed Up Arrests*, NBC News (June 11, 2025, 5:00AM), <https://www.nbcnews.com/politics/national-security/trump-admin-tells-immigration-judges-dismiss-cases-tactic-speed-arrest-rcna212138>; Wilson re: Two Arrests, *supra* n. 4; Saavedra & Arnold, *supra* n. 4; Weber, *supra* n. 4; Nieto del Rio re: Inside Boston Immigr. Ct. Arrest, *supra* n. 4; Conklin & Melugin, *supra* n. 4; Wilson re: Arrest, *supra* n. 4; Larson, *supra* n. 4; Romero et al., *supra* n. 4; Carey, *supra* n. 4; Schmidt, *supra* n. 4; Franklin & Hosseini, *supra* n. 4; Wilson re: Initial Arrest, *supra* n. 4; Díaz & Alvarez, *supra* n. 4; Bradbury, *supra* n. 4; Nieto del Rio re: Boston Immigr. Ct. Arrests, *supra* n. 4; Gamboa, *supra* n. 4; Aleaziz et al., *supra* n. 4; Sherry, *supra* n. 4; Gonzalez & Ruelas, *supra* n. 4; Noriega, *supra* n. 4; Hogan re: NYC Immigr. Ct. Arrests, *supra* n. 4; Chien, *supra* n. 4; Elsen-Rooney re: Dylan Arrest, *supra* n. 4; Malaver et al., *supra* n. 4; Gomez re: Immigr. Ct. Arrests, *supra* n. 4; Hendriks, *supra* n. 4; Montoya-Galvez & Cavazos, *supra* n. 4; Hernández & Sacchetti, *supra* n. 4; Hughes, *supra* n. 4; Goodman et al., *supra* n. 4; Hagstrom & Melugin, *supra* n. 4; Goodman & Salomon, *supra* n. 4; Shoemaker, *supra* n. 4; Ruiz et al., *supra* n. 4; Álvarez, *supra* n. 4; Lacy et al., *supra* n. 4; Ingram, *supra* n. 4; Shapiro re: ICE Arrests, *supra* n. 4.

⁸ James, *supra* n. 4; Cole et al., *supra* n. 4; Ferré-Sadurní re: Lawsuit, *supra* n. 4; Cuevas, *supra* n. 4; Bernstein, *supra* n. 4; Browning & O'Brien, *supra* n. 4; Kadifa re: 4 Arrests, *supra* n. 4; Li & Cheang, *supra* n. 4; Khan, *supra* n. 4; Kadifa re: Forum Shopping, *supra* n. 4; Yahr, *supra* n. 4; Hogan re: Mamadou Arrest, *supra* n.2; Cheang, *supra* n. 4; Brigida, *supra* n. 4; Moore & Zavala, *supra* n. 4; Lyons, *supra* n. 4; Oehrli, *supra* n. 4; Garcia, *supra* n. 4; Bustillo, *supra* n. 4; Ferré-Sadurní re: Inside NYC Immigr. Cts., *supra* n. 4; Bellisile et al. re: Immigration Officers Intensify Arrests, *supra* n. 4; Wilson re: Two Arrests, *supra* n. 4; Saavedra & Arnold, *supra* n. 4; Nieto del Rio re: Inside Boston Immigr. Ct. Arrest, *supra* n. 4; Conklin & Melugin, *supra* n. 4; Wilson re: Arrest, *supra* n. 4; Romero et al., *supra* n. 4; Carey, *supra* n. 4; Franklin & Hosseini, *supra* n. 4; Bradbury, *supra* n. 4; Nieto del Rio re: Boston Immigr. Ct. Arrests, *supra* n. 4; Gamboa, *supra* n. 4; Aleaziz et al., *supra* n. 4; Chien, *supra* n. 4; Elsen-Rooney re: Dylan Arrest, *supra* n. 4; Malaver et al., *supra* n. 4; Gomez re: Immigr. Ct. Arrests, *supra* n. 4; Hernández & Sacchetti, *supra* n. 4; Hughes, *supra* n. 4; Ruiz et al., *supra* n. 4; Lacy et al., *supra* n. 4; Shapiro re: ICE Arrests, *supra* n. 4; Seiwel re: ICE Snatching, *supra* n. 4; Hendricks, *supra* n. 4; Seiwel re: ICE Opposition Grows, *supra* n. 4.

⁹ Dubois et al., *supra* n. 7.

Arrests and dismissals at immigration courts have outraged Americans around the country. Opposition to these actions and doubts about their legality have prompted mass protests at immigration courts in New York, Seattle, San Francisco, and elsewhere.¹⁰ It has also prompted clergy, political leaders, and other members of the public to accompany noncitizens to their immigration court dates to document arrests and dismissals, attempt to stop the former, help arrested noncitizens inform their families.¹¹ At least four federal judges have also deemed a few specific arrests at immigration courts unlawful and ordered ICE to release the arrestees,¹² while a class of noncitizens represented by several rights groups has also sued to stop the arrests nationwide.¹³

¹⁰ Thamer, *supra* n. 4; Browning & O'Brien, *supra* n. 4; Alicia Victoria Lozano, *Violent Clashes at San Francisco Immigration Court Won't Deter Protestors, Organizers Say*, NBC News (July 10, 2025, 4:43 PM), <https://www.nbcnews.com/news/us-news/violent-clashes-san-francisco-immigration-court-wont-deter-protesters-rcna218059>; Sarah Rumpf-Whitten, *Watch: ICE Agents Fight Off Masked Mob Outside Blue City Immigration Court*, FOX News (July 10, 2025, 1:12 PM), <https://www.foxnews.com/us/watch-ice-agents-fight-off-masked-mob-outside-blue-city-immigration-court>; Shay Arthur, *Crowd Gathers for Immigration Rally at Memphis Court*, WREG Memphis (July 8, 2025, 12:07 PM), <https://wreg.com/news/local/crowd-gathers-for-immigration-rally-at-memphis-court/>; Ramos, *supra* n. 4; Regalado & Karlamangla, *supra* n. 4; Li & Cheang, *supra* n. 4; Khan, *supra* n. 4; DeAngelis, *supra* n. 4; Stephania Jimenez, *PSL San Antonio Organizes Event to Educate Community on Immigration Laws Amid Rising ICE Deportations*, KSAT (July 1, 2025, 10:42 PM), <https://www.ksat.com/news/local/2025/07/02/psl-san-antonio-organizes-event-to-educate-community-on-immigration-laws-amid-rising-ice-deportations/>; May & Marr, *supra* n. 4; Shapiro re: ICE Tactic Change, *supra* n. 4; Ferré-Sadurní re: Lander Arrest, *supra* n. 4; Moore & Zavala, *supra* n. 4; Greg Micek et al., *Sacramento Immigration Court on Lockdown, Draws Protest After Suspected ICE Operation*, Capradio (June 12, 2025), <https://www.capradio.org/articles/2025/06/12/sacramento-immigration-court-on-lockdown-draws-protest-after-suspected-ice-operation/>; Hobbs re: Sacramento Immigr. Ct. Arrests, *supra* n. 4; Lyons, *supra* n. 4; Ferré-Sadurní re: Inside NYC Immigr. Cts., *supra* n. 4; Bellisile et al. re: Immigration Officers Intensify Arrests, *supra* n. 4; Alvarez, *supra* n. 4; George Kelly & Max Harrison-Caldwell, *Protesters Shut Down Immigration Court After ICE Arrests*, The San Francisco Standard (June 10, 2025, 1:00 PM), <https://sfstandard.com/2025/06/10/protesters-surround-immigration-court-after-ice-arrests/>; Kadifa et al., *supra* n. 4; Weber, *supra* n. 4; Joe Rivano Barros et al., *S.F. Police Arrest Dozens in 2nd Night of Protests Against ICE*, Mission Local (June 9, 2025, 8:16 PM), <https://missionlocal.org/2025/06/sf-mission-march-mobilized-thousands-against-ice/>; Boyanton, *supra* n. 4; Aleaziz et al., *supra* n. 4; Hogan re: NYC Immigr. Ct. Arrests; Ruiz et al, *supra* n. 4.

¹¹ Salama, *supra* n. 4; Markey, *supra* n. 4; Mose re: ICE in Court; Bellisile et al. re: Volunteers Flock to Immigration Courts, *supra* n. 4; Ferré-Sadurní re: Lawsuit, *supra* n. 4; Belz, *supra* n. 4; Thamer, *supra* n. 4; Strassburger & Critchley-Menor, *supra* n. 5; Ciara Encinas, *Volunteers Describe How They Document ICE Arrests in Immigration Courts*, Fox 5 (July 11, 2025, 4 :55 PM), <https://fox5sandiego.com/news/local-news/san-diego/san-diego-court-ice-arrests/>; Zavala, *supra* n. 4; Joey Safchik, *ICE Handcuffs 71-Year-Old Grandmother, a US Citizen, at San Diego Immigration Court*, 7 San Diego (July 9, 2025, 7 :06 PM), <https://www.nbcsandiego.com/news/local/ice-arrests-71-year-old-grandmother-a-us-citizen-at-san-diego-immigration-court/3865098/>; Ramos, *supra* n. 4; Rossoto, *supra* n. 4; Khan, *supra* n. 4; Singhai re: Volunteers, *supra* n. 4; Gomez re : Faith Leaders, *supra* n. 4; Shapiro re: ICE Tactic Change, *supra* n. 4; Sanchez & Ebrahimji, *supra* n. 4; Ferré-Sadurní re: Lander Arrest, *supra* n. 4; Ferré-Sadurní re: Lander Escort, *supra* n. 4; Micek et al., *supra* n. 4; Stone, *supra* n. 4; Hobbs re: Sacramento Immigr. Ct. Arrests, *supra* n. 4; Estrada re: Two Arrests, *supra* n. 4; Boyanton, *supra* n. 4.

¹² See Markey, *supra* n. 4; Bernstein, *supra* n. 4; Baumhardt, *supra* n. 4; Ramos, *supra* n. 4; Vertuno, *supra* n. 4.

¹³ See, e.g., Rivera et al., *supra* n. 4; Abbot, *supra* n. 4; Bellisile, *supra* n. 4; Cole et al., *supra* n. 4; Ferré-Sadurní re: Lawsuit, *supra* n. 4.

Responsive records will address critical integrity questions left open by existing media coverage. Such records will show the extent of immigration judges' involvement in ICE arrests at or near immigration courts. They will also reveal the extent to which immigration judges retain discretion to consider the individual circumstances of a particular case when adjudicating a motion to dismiss by ICE and how immigration judges are responding to ICE arrests in their courts and pressure to dismiss immigration cases.

B. URGENCY TO INFORM THE PUBLIC ABOUT FEDERAL GOVERNMENT ACTIVITY BY A REQUESTER

Additionally, and alternatively, the Council has a compelling need for the records sought. It is primarily engaged in disseminating information. And urgency also exists to inform the public about the topics discussed above.

1. *The Council Primarily Engages in Information Dissemination*

The Council primarily engages in disseminating information and analysis on immigration and other issues. Organizations primarily engaged in information dissemination include not only “media organizations and newspapers,” *Heritage Found. v. Entl. Prot. Agency*, Civil Action No. 23-748, 2023 WL 2954418, *3 (D.D.C. 2023), but also “non-partisan law and public policy group[s]” like Requesters that “regularly write[], publish[], and disseminat[e], information online,” *Brennan Ctr. for Just.*, 498 F. Supp. 3d at 98 (Brennan Center); see also *Ctr. for Pub. Integrity v. U.S. Dep’t of Def.*, 411 F. Supp. 3d 5 (D.D.C. 2019) (Center for Public Integrity); *Protect Dem. Proj. v. U.S. Dep’t of Def.*, 263 F. Supp. 3d 293, 298 (D.D.C. 2017) (Protect Democracy Project); *Am. Civil Liberties Union*, 321 F. Supp. 2d at 29 n.5 (Electronic Privacy Information Center (“EPIC”)).

Like Brennan Center, Protect Democracy Project, EPIC, and Center for Public Integrity, the Council authors factsheets and special reports on proposed and actual immigration policies, some of which shape media coverage in outlets across the nation.¹⁴ It also analyzes immigration data and other government records—including those obtained through FOIA requests like this one—in interactive web reports.¹⁵ And it circulates its reports and factsheets through its

¹⁴ See, e.g., *Trump-Backed Mass Deportations Would Cost Billions*, Report Says, CBS News (Oct. 3, 2024), <https://www.cbsnews.com/video/trump-backed-mass-deportations-would-cost-billions-report/> (discussing Am. Immigr. Council, *Mass Deportation: Devasting Costs to America, Its Budget and Economy* (Oct. 2, 2024), <https://www.americanimmigrationcouncil.org/report/mass-deportation/>); Emma Goldberg, *What if Trump Deported Millions of Immigrants*, The New York Times (Oct. 22, 2024), https://www.nytimes.com/interactive/2024/10/22/us/elections/trump-deportation.html?unlocked_article_code=1.Uk4.Pjao.990iYFTTpEl6 (same); *What Trump’s Mass Deportation Plan Might Look Like If He Wins the Election*, 60 Minutes (Oct. 27, 2024), <https://www.youtube.com/watch?v=WjCHjwISMFI> (same); *Mass Deportations*, Last Week Tonight (Oct. 27, 2024), <https://www.youtube.com/watch?v=0UEhMDAIX1Y> (same); *The Costs of Mass Deportation? Expert Breaks Down Trump’s Immigration Plan*, Amanpour & Company, (Oct. 28, 2024), <https://www.youtube.com/watch?v=Dmfo3atidKE> (same).

¹⁵ See Am. Immigr. Council, *Torrance County Detention Facility: Troubling Role in Detaining Haitian Migrants During the 2021 Del Rio Incident* (2024), <https://www.americanimmigrationcouncil.org/foia/torrance-detention-facility/>; Am.

website,¹⁶ blog, email newsletters, and an X (formerly known as Twitter) account with 64.9 thousand followers.¹⁷

2. Urgency Exists to Inform the Public

Urgency also exists to inform the public about the following: (i) the extent of immigration judges' involvement in ICE arrests in and near its immigration courts; (ii) immigration judges' discretion to consider the individual circumstances of a particular case when adjudicating a motion to dismiss by ICE; and (iii) how immigration judges are responding to ICE arrests in their courts and pressure to dismiss immigration cases.

Requisite urgency exists where “the request touches on ‘a matter of current exigency to the American public’” and delay “compromises a significant recognized interest.” *Protect Dem. Proj.*, 263 F. Supp. 3d 293 at 299 (quoting *Al-Fayed v. CIA*, 254 F.3d 300, 310 (D.C. Cir. 2001)). The above topics are exigent to the American public, as demonstrated by the one hundred and twenty plus articles discussing arrests cited in this request, the eighty plus articles discussing dismissals, and the mass protests outside immigration courts. See *CREW*, 2025 WL 752367, at *13 (finding urgency to inform the public based on at least fifty articles on the issue); *Am. Civil Liberties Union of No. Cal. v. U.S. Dep’t of Def.*, No. C 06-01698, 2006 WL 1469418, at *6 (N.D. Cal. May 25, 2006) (same); 28 C.F.R. § 16.5(e)(3) (“The existence of numerous articles published on a given subject can be helpful to establishing the requirement that there be an ‘urgency to inform’ the public on the topic.”).

Delayed production of responsive records would compromise the ongoing public debate about the propriety of ICE arrests at immigration courts and the dismissal of immigration cases, particularly the appropriateness of any role immigration judges are playing in these arrests and how immigration judges are responding to ICE arrests outside their courtrooms and pressure to dismiss immigration cases. Cf. *CREW*, 2025 WL 752367, at *13 (expediting a request for records about the U.S. DOGE Service); *Protect Dem. Proj.*, 263 F. Supp. 3d 293 at 299 (expediting a request for records about a possible unlawful airstrike on Syria); *Am. Civil Liberties Union of N. Cal. v. U.S. Dep’t of Def.*, No. C. 06-01698, 2006 WL 1469418, at *6-7 (N.D. Cal. May 25, 2006) (expediting a request for records about possible unlawful military surveillance of protestors); *Freedom Coalition of Doctors for Choice v. Ctrs. For Disease Control & Prevention*, 2:23-cv-102, 2024 WL 69084, at *14 (N.D. Tex. Jan. 5, 2024) (expediting a request disputing the effectiveness of COVID-19 vaccines).

Immigr. Council, Ohio, We Have a Problem: Border Patrol & Local Law Enforcement’s Patterns & Tactics of Abuse in Ohio’s Immigration Enforcement (2024), <https://www.americanimmigrationcouncil.org/foia/ohio-border-patrol-abuse>; Am. Immigr. Council, Refugee Resettlement in U.S. Cities (2019), https://data.americanimmigrationcouncil.org/en/refugee-resettlement-us/#exploratory_tool

¹⁶ The Council’s website received 4,506,460 views from 2,952,034 different users in 2024.

¹⁷ See <https://x.com/immcouncil>.

IV. FEE WAIVER REQUEST

Requestors seek a fee waiver since “disclosure of the requested records is in the public interest.” 5 U.S.C. § 552(a)(4)(A)(iii). EOIR must construe “the FOIA fee waiver provision . . . liberally . . . in favor of waivers for noncommercial requesters” like Requesters. *Schoenman v. FBI*, 604 F. Supp. 2d 174, 188 (D.D.C. 2009). Disclosure is in the public interest where it (A) “is likely to contribute significantly to public understanding of the operations or activities of the government” and (B) “is not primarily in the commercial interest of the [R]equesters.” 5 U.S.C. § 552(a)(4)(A)(iii); see also 28 C.F.R. § 16.10(k)(1). Requesters satisfy both requirements.

A. DISCLOSURE OF THE INFORMATION IS IN THE PUBLIC INTEREST

Disclosing the requested records is likely to contribute significantly to the public’s understanding of the following: (i) the extent of immigration judges’ involvement in ICE arrests in and near its immigration courts; (ii) immigration judges’ discretion to consider the individual circumstances of a particular case when adjudicating a motion to dismiss by ICE; and (iii) how immigration judges are responding to ICE arrests in their courts and pressure to dismiss immigration cases.

EOIR must consider two factors when assessing a disclosure’s contribution to public understanding of a government activity or operation, see 28 C.F.R. § 16.10(k)(2): (i) whether the request has a “direct and clear” rather than “remote or attenuated” connection to “identifiable operations or activities of the federal government”; and (ii) whether disclosure “would be likely to contribute significantly to public understanding of those operations or activities.” *Id.* § 16.10(k)(2)(i)-(ii). Each factor supports a fee waiver here.

1. *Request Has a Direct and Clear Connection to Government Operations or Activities*

First, this request has a direct and clear relation to the following governmental operations and activities: (i) the extent of immigration judges’ involvement in ICE arrests in and near its immigration courts; (ii) immigration judges’ discretion to consider the individual circumstances of a particular case when adjudicating a motion to dismiss by ICE; and (iii) how immigration judges are responding to ICE arrests in their courts and pressure to dismiss immigration cases.

2. *Records Sought Will Contribute Significantly to Public Understanding of the Above*

Second, disclosing the records sought will “contribute significantly to public understanding of” the above activities. *Id.* § 16.10(k)(2)(ii). Such contribution exists where “[d]isclosure of the requested information [is] meaningfully informative about [these] activities” and “contribute[s] to the understanding of a reasonably broad audience of persons interested in the subject, as opposed to the individual understanding of the requester.” *Id.* § 16.10(k)(2)(ii)(A)-(B). Both criteria are satisfied here.

i. DISCLOSURE OF RECORDS IS MEANINGFULLY INFORMATIVE

Disclosing requested records will be meaningfully informative about immigration judges' exact role in ICE enforcement operations at or near immigration courts. Disclosure is meaningfully informative where disclosed information is not "in the public domain, in either the same or a substantially identical form." *Id.* § 16.10(k)(2)(ii)(A).

Here, as demonstrated by the media coverage cited above, the public only knows that ICE is arresting noncitizens at or near immigration courts after moving to dismiss their immigration cases and that immigration judges are granting many dismissals, thereby allowing ICE to pursue expedited removal.¹⁸ Public knowledge does not extend to the extent of EOIR's involvement in ICE arrests at and around its immigration courts, immigration judges' remaining discretion to deny a request by ICE to dismiss an immigration case, and immigration judges' responses to ICE arrests and pressure to dismiss cases. Requested records are therefore "meaningfully informative" about each of these activities.

ii. DISCLOSURE OF RECORDS CONTRIBUTES TO UNDERSTANDING OF A REASONABLY BROAD AUDIENCE

Disclosing requested records will contribute to the understanding of a reasonably broad audience of persons interested in immigration judges' role in ICE arrests at and around immigration courts, these judges' remaining discretion to not dismiss an immigration case at ICE's request, and these judges' responses to arrests and in their courts and pressure to dismiss cases.

Requesters presumably satisfy this consideration as representatives of the news media. *Id.* § 16.10(k)(2)(ii)(B). They both "gather[] information of potential interest to a segment of the public, use[] [their] editorial skills to turn the raw materials into a distinct work, and distribute[] that work to an audience." *Id.* § 16.10(b)(6); see also *Serv. Women's Action Network v. Dep't of Def.*, 888 F. Supp. 2d 282, 287-88 (D. Conn. 2012) (finding that ACLU is a news media representative); cf. *Elec. Privacy Info. Ctr. v. Dep't of Def.*, 241 F. Supp. 2d 5, 10-15 (D.D.C. 2003) (finding that an organization similar to the Council is a news media representative).

Additionally, and alternatively, the ongoing and extensive media coverage in nationwide, state, and local outlets about the dismissal of immigration cases and ICE arrests at and near immigration courts shows that these matters interest a reasonably broad audience. Requesters intend and are well-equipped to inform this audience about the information contained in responsive records, as they are experts in educating the public on immigration issues.

As detailed further in the expedited processing section, the Council analyzes government records—including those obtained through FOIA requests like this one—in interactive web

¹⁸ See generally Media articles cited in footnotes 4-13.

reports and other publications available for free on its website.¹⁹ And it circulates these publications for free through its website,²⁰ blog, email newsletters, and an X account with 64.9 thousand followers. It intends to publish content about records obtained from this request on its website and otherwise disseminate that content to its readers and the larger public.

Similarly, LatinoJustice PRLDEF produces newsletters, blogs, reports, opinion, editorials, and video interviews about the constitutional rights and equal protection of Latinos, immigrants, and other marginalized communities.²¹ And it circulates these publications for free through its social media accounts. All of its materials are free and available to the public on its website.

In sum, Requesters intend to analyze the records they receive from this request and educate a broad audience of the interested public about them. And, Requesters have a demonstrated ability to do so.

B. REQUESTERS' LACK OF COMMERCIAL INTEREST

Turning to commercial interest, disclosure is not primarily in Requesters' commercial interest. As nonprofits, Requesters have no commercial interest in the records requested. See *Am. Ctr. for L. & Just. v. U.S. Dep't of Homeland Sec.*, 573 F. Supp. 3d 78, 84 (D.D.C. 2021) (“[N]onprofit organizations by definition have no commercial interests.”); *Am. Immigr. Council v. U.S. Dep't of Homeland Sec.*, 82 F. Supp. 3d 396, 406 (D.D.C. 2015) (finding that the Council has no such interest in its record requests). Rather, the request furthers Requesters' work to increase public understanding of immigration processes, including EOIR's role in ICE enforcement operations in and around immigration courts, immigration judges' discretion to not dismiss cases, and these judges' responses to the pressure to do so.

Alternatively, and additionally, the public interest in obtaining a better understanding of EOIR's actions discussed above exceeds any commercial interest that EOIR may ascribe to Requesters in records responsive to this request.

Thank you for your attention to this request. If you have any questions regarding this request, please do not hesitate to contact us.

¹⁹ See, e.g., *Torrance County Detention Facility: Troubling Role in Detaining Haitian Migrants During the 2021 Del Rio Incident*, *supra* n. 15; *Ohio, We Have a Problem: Border Patrol & Local Law Enforcement's Patterns & Tactics of Abuse in Ohio's Immigration Enforcement*, *supra* n. 15; *Refugee Resettlement in U.S. Cities*, *supra* n. 15.

²⁰ The Council's website received 4,506,460 views from 2,952,034 different users in 2024.

²¹ See, e.g., LatinoJustice PRLDEF, *100 Days Later: The Harm So Far to Latinx Communities* (April 2025), <https://www.latinjustice.org/en/pressreport/100-days-later-harm-so-far-latinx-communities>; LatinoJustice PRLDEF, *A Promise to Harm: What's at Stake for the Latino Community in Project 2025* (Oct. 2024), <https://www.latinjustice.org/en/pressreport/promise-harm-whats-stake-latinx-community-project-2025>.

Very truly yours,

/s/ Chris Opila

Christopher (“Chris”) Opila
Staff Attorney (Transparency)
American Immigration Council
PMB2026
2001 L Street N.W., Suite 500
Washington, DC 20036
202-507-7699 | copila@immcouncil.org

/s/Rex Chen

Rex Chen
Supervising Counsel for Immigrant Rights
LatinoJustice PRLDEF,
475 Riverside Drive Suite 1901
New York, NY 10115
212-219-3360 | rchen@latinojustice.org



July 28, 2025

Via Public Access Link Portal & Certified Mail

U.S. Department of Justice
Executive Office for Immigration Review
Office of General Counsel – FOIA Service Center
5107 Leesburg Pike, Suite 1903
Falls Church, VA 22041

Director of Public Affairs
Office of Public Affairs
Department of Justice,
950 Pennsylvania Avenue NW.
Washington, DC 20530-0001

Re: Freedom of Information Act Request on Terminations of Immigration Proceedings and ICE Arrests at Immigration Courts

Dear FOIA Officer:

The American Immigration Council (the “Council”) and LatinoJustice PRLDEF (collectively, “Requesters”) submit this request to the Executive Office for Immigration Review (“EOIR”) under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552.

Since around the middle of May 2025, U.S. Immigration Customs and Enforcement (“ICE”) has been arresting noncitizens in or near EOIR immigration courts when noncitizens appear for a hearing in their immigration cases. ICE has also sought to dismiss these cases so it can seek the expedited removal of respondent noncitizens. Requesters seek certain records about these arrests and dismissals as well as expedited processing and a fee waiver.

I. REQUEST FOR INFORMATION

Requesters seek all emails,¹ correspondence, calendar entries, meeting notes, text messages, Signal messages, WhatsApp messages, Microsoft Teams messages, and other similar

¹ Requested emails exclude duplicates. (E.g. agencies should only produce one record of an email chain that contains all emails in that chain, rather than a record for each new email in the chain that contains all emails in the chain prior to that email).

communication records² between one or more individuals listed in Column A of the table below and one or more individuals listed in Column B about a topic listed in Column C from April 1, 2025, to the date of a reasonable search for responsive records.

A	B	C
The Chief Immigration Judge	ICE Director	Expedited removal
A Regional Deputy Chief Immigration Judge (“RDCJ”)	ICE Deputy Director	An ICE enforcement operation in or near an immigration court
An Assistant Chief Immigration Judge (“ACIJ”)	ICE Chief of Staff	An ICE arrest in or near an immigration court
A Court Administrator	ICE Associate Director of Enforcement and Removal Operations (“ERO”)	Dismissal or termination of immigration cases or proceedings in immigration court ³
	The Director of ERO Field Operations	
	An Assistant Director of ERO Field Operations	
	An ERO Field Office Director	
	An ERO Field Office Deputy Director	

II. FORMAT OF PRODUCTION

Requesters seek responsive electronic records in a machine-readable, native file format, with all metadata and load files. Requesters ask EOIR to produce responsive materials in their entirety, including all attachments, appendices, enclosures, and/or exhibits, in a text-searchable, static-image format (PDF), in the best image quality in the agency’s possession, and that the records be provided in separate, Bates-stamped files.

III. EXPEDITED PROCESSING

Requesters seek expedited processing of this request and certify that the statements herein are “true and correct” pursuant to 28 C.F.R. § 16.5(e)(3). FOIA obligates EOIR to process requests expeditiously in two cases: (i) those where a requester “demonstrates a compelling need”—such as “urgency to inform the public concerning actual or alleged Federal Government activity” if the

² Responsive records should be construed as exclusive of records that is part of a noncitizen’s record of proceedings (e.g., a motion to dismiss).

³ Responsive records should be construed as exclusive of records that are part of a noncitizen’s record of proceedings (e.g., a motion to dismiss).

requester is “primarily engaged in disseminating information,” 5 U.S.C. § 552(a)(6)(E)(i), (v)—and (ii) “in other cases determined by the agency,” *id.* § 552(a)(6)(E)(i), which, for the Department of Justice, include “[a] matter of widespread and exceptional media interest in which there exist possible questions about the government’s integrity which affect public confidence,” 28 C.F.R. § 16.5(e)(1)(ii), (iv). Both cases exist here.

A. A MATTER OF WIDESPREAD AND EXCEPTIONAL INTEREST RAISING GOVERNMENT INTEGRITY CONCERNS

ICE arrests at and near immigration courts and immigration judges’ dismissal of immigration cases to facilitate expedited removal are matters of widespread and exceptional media interest in which there exist possible questions about the government’s integrity which affect public confidence.

Fifty articles on an issue make it a matter of widespread and exceptional public interest. *Citizens for Resp. & Ethics in Wash. v. U.S. DOGE Serv.*, Case No. 25-cv-511 (CRC), 2025 WL 752367, at *13 (D.D.C. Mar. 10, 2025) (hereinafter “CREW”) *see also* *Brennan Ctr. for Just. v. Dep’t of Com.* 498 F. Supp. 3d 87, 97 (D.D.C. 2020). A “handful of articles” also establishes such interest where the articles are “in a variety of publications” and “repeatedly reference the ongoing national discussion.” *Am. Civ. Liberties Union v. Dep’t of Just.*, 321 F. Supp. 2d 24, 32 (D.D.C. 2004).

Here, one hundred and twenty one articles in nationwide, state, local, and international media outlets have covered ongoing ICE arrests at or near immigration courts in Atlanta, Boston, Buffalo, Charlotte, Denver, Houston, Los Angeles, Miami, New York, Portland, Phoenix, Sacramento, San Diego, San Francisco, Seattle, and elsewhere throughout the country since May 20, 2025.⁴ This equates to almost two articles per day for sixty-six days.

⁴ Margaret Kadifa, *ICE Arrests All Adults Without Children at S.F. Immigration Court Today*, Mission Local (July 25, 2025, 1:05 PM), <https://missionlocal.org/2025/07/hed-ice-steps-up-arrests-at-s-f-immigration-court/> (hereinafter, “Kadifa re: Adult Arrests”); Pedro Camacho, *ICE Arrests Migrant Deemed Mentally Impaired by Judge as He Exits Immigration Court: ‘He’s Clearly Not Understanding the Questions’*, The Latin Times (July 25, 2025, 10:36 AM), <https://www.latintimes.com/ice-arrests-migrant-deemed-mentally-impaired-judge-he-exits-immigration-court-hes-clearly-not-587576>; Jordan Salama, *When ICE Agents Are Waiting Outside the Courtroom*, The New Yorker (July 25, 2025), <https://www.newyorker.com/news/the-lede/when-ice-agents-are-waiting-outside-the-courtroom>; Eileen Markey, *Punished for Playing by the Rules: The Deliberate Cruelty of Trump’s Deportation Regime*, The Nation (July 24, 2025), <https://www.thenation.com/article/society/ice-trump-detention-regime-cruelty/>; Dean Moses, *ICE in Court: Feds Snatch More Immigrants as Lander, Williams Demand Safety Inspection of Detainment Center*, AMNY (July 23, 2025), <https://www.amny.com/politics/ice-immigrants-court-lander-williams-07232025/> (hereinafter, “Mose re: ICE in Court”); Danielle James, *ICE Arrests at Check-Ins, Court Hearings Are on the Rise. Michigan Is No Exception*, MLIVE (July 21, 2025, 7:10 AM), <https://www.mlive.com/politics/2025/07/ice-arrests-at-check-ins-court-hearings-are-on-the-rise-michigan-is-no-exception.html>; Margaret Kadifa, *ICE Agents Keep Snatching Asylum Seekers Immediately After Their Court Hearings*, Mother Jones (July 21, 2025), <https://www.motherjones.com/politics/2025/07/ice-agents-arrest-asylum-seekers-after-court-hearings-san-francisco/> (hereinafter, “Kadifa re: ICE Snatching”); Esmeralda Perez, *San Diego Immigration Attorney Weighs in on Lawsuit Challenging ICE Courthouse Arrests*, CBS8 (July 20, 2025, 10:19 PM), <https://www.cbs8.com/article/news/local/san-diego-attorney-weighs-in-on-lawsuit-challenging-ice->

[courthouse-arrests/509-79fec519-eb00-442c-b479-4522f423be7c](https://www.abcnews.com/US/wireStory/volunteers-flock-immigration-courts-support-migrants-arrested-hallways-123902561); Martha Bellisile et al., *Volunteers Flock to Immigration Courts to Support Migrants Arrested in the Hallways*, ABC News (July 20, 2025, 8:38 AM), <https://www.abcnews.com/US/wireStory/volunteers-flock-immigration-courts-support-migrants-arrested-hallways-123902561> (hereinafter “Bellisile et al. re: Volunteers Flock to Immigration Courts”); Eduardo Cuevas, *‘Escalation:’ Federal Agents Now Detaining People with Active Immigration Cases*, USA Today (July 18, 2025, 11:26 AM), <https://www.usatoday.com/story/news/nation/2025/07/18/migrants-immigration-court-trump-crackdown/84614161007/>; Mark Rivera et al., *ICE Arrests at Immigration Court in Chicago, Nationwide Labeled ‘Unlawful’ in New Lawsuit*, ABC 7 Chicago (July 18, 2025, 8:36 PM), <https://abc7chicago.com/post/us-immigration-news-ice-arrests-courts-chicago-nationwide-labeled-unlawful-new-lawsuit-trump-administration/17186490/>; Jeff Abbot, *Texas Based Immigration Advocacy Group Sues Trump Administration Over Courthouse Arrests*, El Paso Times (July 18, 2025, 5:02 AM), <https://www.elpasotimes.com/story/news/immigration/2025/07/18/texas-immigration-advocacy-group-challenges-ices-courthouse-arrests/85255298007/>; Emily Belz, *In Immigration Court, Christians Show Up to Fill the Back Benches*, Christianity Today (July 18, 2025), <https://www.christianitytoday.com/2025/07/immigration-court-observation-ice-arrests/>; David Baratz, *See How ICE Targets Immigrants Appearing at Routine Court Hearings*, USA Today (July 17, 2025, 3:15 PM), <https://www.usatoday.com/picture-gallery/news/nation/2025/07/17/how-ice-targets-immigrants-at-court-hearings-photos/85259555007/>; Martha Bellisile, *Homeland Security Officials Defend Immigration Court Arrests After Being Sued*, Associated Press (July 17, 2025, 2:04 PM), <https://apnews.com/article/ice-immigration-court-immigrants-a5190ada4a6019f84d76e62c11c44e30>; Swasti Singhai, *Five Days, 12 Arrests: A Week Inside San Diego Immigration Court*, Times of San Diego (July 17, 2025, 7:41 AM), <https://timesofsandiego.com/politics/2025/07/17/arrests-immigration-court-trump-anxiety-chaos/> (hereinafter, “Singhai re: Week at San Diego Immigration Court”); Devan Cole et al., *Trump Administration Sued Over ICE Arrests at Immigration Courthouses*, CNN (July 16, 2025, 6:23 PM), <https://www.cnn.com/2025/07/16/politics/ice-immigration-courthouse-arrests-lawsuit>; Luis Ferré-Sadurní, *Immigrants File Class-Action Lawsuit to Stop ICE Courthouse Arrests*, NY Times (July 16, 2025), <https://www.nytimes.com/2025/07/16/nyregion/trump-ice-arrests-lawsuit-immigrants.html> (hereinafter, “Ferré-Sadurní re: Lawsuit”); Maxine Bernstein, *Federal Judge in Oregon: Homeland Security ‘Tricked’ Asylum Seeker Before Arrest at Immigration Court*, The Oregonian (July 15, 2025, 10:47 AM), <https://www.oregonlive.com/pacific-northwest-news/2025/07/federal-judge-in-oregon-homeland-security-tricked-asylum-seeker-before-arrest-at-immigration-court.html>; Sarah Thamer, *Advocates Denounce ICE Arrests at Fort Snelling Immigration Court*, MPR News (July 15, 2025, 4:00 AM), <https://www.mprnews.org/story/2025/07/15/advocates-protest-ice-arrests-at-immigration-court>; Alex Baumhardt, *Asylum Seeker Taken by ICE Outside Portland Immigration Court to Be Immediately Released*, Oregon Capital Chronicle (July 14, 2025, 5:24 PM), <https://oregoncapitalchronicle.com/2025/07/14/asylum-seeker-taken-by-ice-outside-portland-immigration-court-to-be-immediately-released/>; Ciara Encinas, *Volunteers Describe How They Document ICE Arrests in Immigration Courts*, Fox 5 (July 11, 2025, 4:55 PM), <https://fox5sandiego.com/news/local-news/san-diego/san-diego-court-ice-arrests/>; Gerardo Zavala, *ICE Arrests Asylum Seeker After Sacramento Court Hearing*, CAPRADIO (July 11, 2025), <https://www.capradio.org/articles/2025/07/11/ice-arrests-asylum-seeker-after-sacramento-court-hearing/>; Paige Browning & John O’Brien, *Fears of Arrests Cause Tension at Seattle Immigration Court*, KUOW (July 10, 2025, 5:58 PM), <https://www.kuow.org/stories/fears-of-ice-arrests-cause-tension-at-seattle-immigration-court/>; Margaret Kadifa, *ICE Arrests 4 People After Immigration Court Hearings in San Francisco*, Mission Local (July 10, 2025, 12:08 PM), <https://missionlocal.org/2025/07/ice-arrests-four-people-after-they-appear-in-immigration-court/> (hereinafter, “Kadifa re: 4 Arrests”); *What Goes On in America’s Immigration Courts*, Economist (July 10, 2025), <https://www.economist.com/united-states/2025/07/10/what-goes-on-in-americas-immigration-courts> (hereinafter “Economist”); Francesca Regalado & Soumya Karlamangla, *Tensions Escalate in San Francisco over Immigration Enforcement*, NY Times (July 9, 2025), <https://www.nytimes.com/2025/07/09/us/ice-immigration-protest-san-francisco.html>; John Ramos, *Peruvian Women Detained by ICE in San Francisco Freed After Judge’s Ruling*, CBS News (July 8, 2025, 6:35 PM), <https://www.cbsnews.com/sanfrancisco/news/san-francisco-ice-woman-freed-immigration-court/>; Tom Li & Ko Lyn Cheang, *Video: Protestors Cling to Departing ICE Van After Arrest at S.F. Immigration Court*, San Francisco Chronicle (July 8, 2025, 5:34 PM),

<https://www.sfchronicle.com/sf/article/protesters-cling-ice-van-chaos-immigration-court-20761721.php>; Henry Rosoff, *ICE Escalates Immigration Court Arrests Outside NYC Court*, PIX11 (July 8, 2025, 5:18 PM), <https://pix11.com/news/local-news/manhattan/ice-escalates-immigration-arrests-outside-nyc-court/>; Sabrina Tavernise, *Against Illegal Immigration, but Married to Someone Here Illegally*, NY Times (July 8, 2025), <https://www.nytimes.com/2025/07/08/us/trump-illegal-immigration-raids-arkansas.html>; Nisa Khan, *When ICE Is Waiting at Immigration Court, What Can Advocates Do?*, KQED (July 7, 2025), <https://www.kqed.org/news/12047018/how-legal-experts-advocates-are-responding-to-the-detention-of-asylum-seekers>; Emma Seiwell, *ICE Opposition Grows, With Lawmakers, Attorneys Decrying Courthouse Arrests as a Violation of Due Process*, NY Daily News (July 5, 2025, 6:00 AM), <https://www.nydailynews.com/2025/07/05/ice-opposition-grows-with-lawmakers-attorneys-decrying-courthouse-arrests-a-violation-of-due-process/> (hereinafter “Seiwell re: ICE Opposition Grows”); Jenna DeAngelis, *NYC Officials Lead “ICE Watch And Accompaniment” Effort at Federal Immigration Court. Here’s What It Means*, CBS News (July 3, 2025, 6:59 PM), <https://www.cbsnews.com/newyork/news/nyc-ice-watch-federal-immigration-court/>; Jim Vertuno, *Honduran Family Freed From Detention After Lawsuit Against ICE Courthouse Arrests*, Associated Press (July 3, 2025, 6:14 PM), <https://apnews.com/article/ice-family-children-lawsuit-release-ef8d764aebec8ba1b67bafc9080a563d>; Swasti Singhai, *San Diego Volunteers Bear Witness Daily as ICE Continues Courtroom Arrests*, Times of San Diego (July 3, 2025, 3:41 PM), <https://timesofsandiego.com/life/2025/07/03/san-diego-community-bears-witness-as-ice-continues-courtroom-arrests/> (hereinafter, “Singhai re: Volunteers”); Emma Seiwell, *ICE Agents Now Snatching Migrants With Open Court Cases; NY Officials, Lawyers Say It’s ‘Utterly Unlawful’*, NY Daily News (July 3, 2025, 6:50 AM), <https://www.nydailynews.com/2025/07/02/ice-agents-now-snatching-migrants-with-open-court-cases-nyc-officials-lawyers-say-its-utterly-unlawful/> (hereinafter “Seiwell re: ICE Snatching”); Shelby Bremer, *Lawsuit Over San Diego Immigration Court Arrest May Give Insight Into ICE Practices*, NBC San Diego (July 2, 2025, 6:01 PM), <https://www.nbcsandiego.com/news/local/san-diego-lawsuit-ice-courthouse-arrests/3861107/>; Melissa Gomez, *Faith Leaders Bear Witness as Migrants Make Their Case in Immigration Court*, Los Angeles Times (July 2, 2025, 3:00 AM), <https://www.latimes.com/california/story/2025-07-02/faith-leaders-bear-witness-as-migrants-make-their-case-immigration-court> (hereinafter, “Gomez re: Faith Leaders”); Madeleine May & Hannah Marr, *Afghan Ally Detained by ICE After Attending Immigration Court Hearing*, CBS News (July 1, 2025, 1:48 PM), <https://www.cbsnews.com/news/afghan-ally-detained-by-ice-immigration-court/>; Margaret Kadifa, *For One S.F. Asylum Seeker, ICE Arrest Meant Move to More Conservative Judge*, Mission Local (July 1, 2025, 4:00 AM), <https://missionlocal.org/2025/07/sf-asylum-seeker-immigration-judge-ice-arrest/> (hereinafter “Kadifa re: Forum Shopping”); Dean Moses, *ICE Raids Continue in Lower Manhattan Court as Immigrant Advocates Rail Against ‘Trump’s Personal Army’*, AMNY (July 1, 2025), <https://www.amny.com/news/ice-raids-lower-manhattan-court-trump-07012025/> (hereinafter, “Moses re: ICE Raids”); Natali Yahr, *Wisconsin Asylum Seeker Miguel Robles Detained in Unprecedented Wave of Courthouse Arrests*, Racine County Eye (July 1, 2025), <https://racinecountyeve.com/2025/06/30/miguel-robles-immigration-asylum/>; Gwynne Hogan, *He Fled Death Threats for Being Gay, Applied for Asylum and Married a U.S. Citizen. ICE Arrested Him Anyway*, The City (June 30, 2025, 1:41 PM), <https://www.thecity.nyc/2025/06/27/ice-arrested-asylum-gay/> (hereinafter “Hogan re: Mamadou Arrest”); Ko Lyn Cheang, *S.F. Drag Performer Detained by ICE After Asylum Hearing*, San Francisco Chronicle (June 28, 2025), <https://www.sfchronicle.com/sf/article/drag-performer-detained-ice-20399122.php>; Anna-Cat Brigida, *A Legal Trap? Why the Trump Administration is Targeting Immigration Courts for Arrests*, Al Jazeera (June 27, 2025), <https://www.aljazeera.com/news/longform/2025/6/27/why-the-trump-administration-is-targeting-immigration-courts-for-arrests>; Julia Marnin, *6-Year-Old Boy with Leukemia Arrested by ICE is Now Detained in Texas, Suit Says*, Fort Worth Star-Telegram (June 26, 2025, 3:23 PM), <https://www.star-telegram.com/news/state/texas/article309472695.html>; Dan Katz, *ICE Arrested a 6-Year-Old Boy with Leukemia at Immigration Court. His Family is Suing*, Texas Public Radio (June 25, 2025, 11:06 PM), <https://www.tpr.org/border-immigration/2025-06-25/ice-arrested-a-6-year-old-boy-with-leukemia-at-immigration-court-his-family-is-suing>; Junyao Yang, *Tracking Every ICE Action in San Francisco So Far*, Mission Local (June 25, 2025, 11:30 AM), <https://missionlocal.org/2025/06/sf-ice-arrests-tracker/>; Luis Ferré-Sadurní, *They Had Come to Graduate. Their Minds Were on a Student Held by ICE*, NY Times (June 25, 2025),

<https://www.nytimes.com/2025/06/25/nyregion/immigrant-students-graduation-ice.html>; Nina Shapiro, *As Pushback Grows to WA Immigration Court Arrests, ICE Changes Tactics*, The Seattle Times (June 24, 2025, 6:00 AM), <https://www.seattletimes.com/seattle-news/as-pushback-grows-to-wa-immigration-court-arrests-ice-changes-tactics/> (hereinafter “Shapiro re: ICE Tactic Change”); Kate Morrissey, *Here’s What’s Happening to the People ICE Arrests in Immigration Court*, Capital & Main (June 24, 2025), <https://capitalandmain.com/heres-whats-happening-to-the-people-ice-arrests-in-immigration-court>; Elizabeth L.T. Moore & Elizabeth Zavala, *Obscure San Antonio Court Becomes Flashpoint in Immigration Debate*, San Antonio Express-News (June 23, 2025), <https://www.expressnews.com/news/article/obscure-san-antonio-immigration-court-spotlight-20381608.php>; Ray Sanchez & Allsha Ebrahimji, *Masked Ice Officers: The New Calling Card of The Trump Administration’s Crackdown*, CNN (June 21, 2025), <https://www.cnn.com/us/ice-immigration-officers-face-masks>; Ken Stone, *ICE Agents Scatter As SD Bishop Pham, Other Clergy Visit Immigration Court*, Times of San Diego (June 20, 2025, 3:04 PM), <https://timesofsandiego.com/life/2025/06/20/ice-agents-scatter-as-sd-bishop-pham-other-clergy-visit-immigration-court/>; Luis Ferré-Sadurní, *Brad Lander Tried to Escort Immigrants facing Arrest. He’s Not Alone*, NY Times (June 19, 2025), <https://www.nytimes.com/2025/06/19/nyregion/ice-immigrants-volunteer-escorts-courthouse.html> (hereinafter “Ferré-Sadurní re: Lander Escort”); Luis Ferré-Sadurní, *Brad Lander is Arrested by ICE Agents at Immigration Courthouse*, NY Times (June 17, 2025), <https://www.nytimes.com/2025/06/17/nyregion/brad-lander-immigration-ice.html> (hereinafter “Ferré-Sadurní re: Lander Arrest”); <https://www.krgv.com/news/ice-detains-three-people-outside-harlingen-immigration-court/>; Lily Celeste, *ICE Detains Three People Attending Their Immigration Hearings in Harlingen*, KRGV.Com (June 15, 2025, 6:40 PM), <https://www.krgv.com/news/ice-detains-three-people-outside-harlingen-immigration-court/>; Stephen Hobbs, *In Sacramento’s Immigration Court, ICE Detention Threats Leave Residents in Limbo*, The Sacramento Bee (June 14, 2025, 10:05 AM), <https://www.sacbee.com/news/politics-government/capitol-alert/article308346910.html> (hereinafter “Hobbs re: Sacramento Immigr. Ct. Arrests”); David Manoucheri, *ICE Agents Wait at Immigration Court in Sacramento for 2d Consecutive Day, Take Someone Into Custody*, KCRA3 (June 12, 2025, 2:53 PM), <https://www.kcra.com/article/ice-agents-immigration-court-sacramento-custody/65049263>; Ryan Oehrli, *‘Rigged’? ICE Agents Are Arresting People at Charlotte’s Immigration Court*, The Charlotte Observer (June 12, 2025, 11:31 AM), <https://www.charlotteobserver.com/news/local/crime/article308209165.html>; Thomas Lyons, *Mood is Tense at Concord Immigration Court Following ICE Arrests*, Berkleyside (June 12, 2025, 9:55 AM), <https://www.berkeleyside.org/2025/06/12/concord-immigration-court-tension-after-ice-arrests>; Ida Domingo, *ICE Arrests 10 at Sterling, Virginia Immigration Court During Enforcement Operation*, ABC 7 News (June 12, 2025, 6:13 AM), <https://wjla.com/news/local/ice-arrests-10-people-sterling-virginia-immigration-court-agents-detain-enforcement-deportation-salvadoran-venezuelan-peruvian-noncitizens-operation-fairfax-county-courtroom-photos-video-homeland-security-trump-administration-illegal>; Armando Garcia, *Immigrant Rights Group Say ICE Officers ‘Ambush Noncitizens’ in Courthouse Arrests, Ask Judge to Intervene*, ABC News (June 12, 2025, 10:32 AM), <https://abcnews.go.com/US/immigrant-rights-groups-ice-officers-ambush-noncitizens-courthouse/story?id=122770040>; Ximena Bustillo, *ICE’s Novel Strategy Allows for More Arrests from Inside Immigration Courts*, NPR (June 12, 2025, 5:02 AM), <https://www.npr.org/2025/06/12/nx-s1-5409403/trump-immigration-courts-arrests>; *ICE Arrests People at the Annandale Immigration Court*, Annandale Today (June 12, 2025), <https://annandaletoday.com/ice-arrests-people-at-the-annandale-immigration-court/>; Hanna Pampaloni, *ICE Makes Arrests at Sterling Immigration Court*, Loudoun Now (June 12, 2025), https://www.loudounnow.com/news/ice-makes-arrests-at-sterling-immigration-court/article_f8f7118c-aca1-4a8d-ad6e-99826fa77eb6.html; Luis Ferré-Sadurní, *Inside a Courthouse, Chaos and Tears as Trump Accelerates Deportations*, NY Times (June 12, 2025), <https://www.nytimes.com/2025/06/12/nyregion/immigration-courthouse-arrests-trump-deportation.html> (hereinafter “Ferré-Sadurní re: Inside NYC Immigr. Cts.”); Carolina Estrada, *Two Men Detained by ICE After Sacramento Immigration Court Hearings*, KCRA3 (June 11, 2025, 11:13 PM), <https://www.kcra.com/article/two-men-detained-by-ice-sacramento-immigration-hearings/65041264> (hereinafter, “Estrada re: Two Arrests”); Stephen Hobbs, *Two Men Handcuffed at Sacramento Immigration Court, Taken to ICE Office*, The Sacramento Bee (June 11, 2025, 6:09 PM), <https://www.sacbee.com/news/politics-government/capitol-alert/article308401280.html>; Martha Bellisile et al., *Immigration Officers Intensify Arrests in Courthouse Hallways on a Fast Track to Deportation*, Associated Press (June

11, 2025, 4:17 PM), <https://apnews.com/article/immigration-court-arrests-ice-deportation-99d822cdc93ae7dc26026c27895d5ea1> (hereinafter “Bellisile et al. re: Immigration Officers Intensify Arrests”); Brittany Taylor et al., *Second Day of Arrests by ICE Agents at Immigration Court in Southwest Houston*, Click 2 Houston.com (June 11, 2025, 10:25 AM), <https://www.click2houston.com/news/local/2025/06/11/ice-agents-stationed-outside-immigration-court-in-houstons-greenspoint-area/>; Hamed Aleaziz, *Under Pressure From the White House, ICE Seeks New Ways to Ramp Up Arrests*, NY Times (June 11, 2025), <https://www.nytimes.com/2025/06/11/us/politics/ice-la-protest-arrests.html>; Priscilla Alvarez, *ICE Protest Nationwide Comes As Agency Scrambles to Meet Trump’s Immigration Arrest Quotas*, CNN (June 10, 2025, 10:16 PM), <https://www.cnn.com/2025/06/10/politics/ice-scrambles-immigration-arrest-quotas>; Conrad Wilson, *ICE Arrests 2 More Asylum Seekers at Immigration Court in Portland*, OPB (June 10, 2025, 5:12 PM), <https://www.opb.org/article/2025/06/10/ice-arrests-2-more-asylum-seekers-at-immigration-court-in-portland/> (hereinafter, “Wilson re: Two Arrests”); Margaret Kadifa et al., *S.F. Immigration Court Shuts Down After ICE Protests, Arrests*, Mission Local (June 10, 2025, 12:43 PM), <https://missionlocal.org/2025/06/video-ice-agents-arrest-people-outside-s-f-courthouse>; Ninfa Saavedra & Robert Arnold, *ICE Arrests Multiple People at Houston’s Immigration Court*, Click2Houston.com (June 10, 2025, 2:48 PM), <https://www.click2houston.com/news/local/2025/06/10/ice-arrests-reportedly-underway-at-houstons-immigration-court/>; Natalie Weber, *ICE Detains Multiple Men at Houston Immigration Courthouse, Civil Rights Organization Says*, Houston Public Media (June 10, 2025, 11:58 AM), <https://www.houstonpublicmedia.org/articles/news/politics/immigration/2025/06/10/523600/ice-detains-multiple-men-at-houston-immigration-courthouse/>; Giulia McDonnell Nieto del Rio, *This Is What An ICE Arrest in Boston Immigration Court Looks Like*, Boston Globe (June 9, 2025, 6:31 AM), <https://www.bostonglobe.com/2025/06/09/metro/ice-arrests-at-boston-immigration-court/> (hereinafter, “Nieto del Rio re: Inside Boston Immigr. Ct. Arrest”); Audrey Conklin & Bill Melugin, *Trump’s ICE Launches Bold Courthouse Migrant Arrest Strategy to Fast-Track Deportations Biden Avoided*, Fox News (June 9, 2025, 4:00 AM), <https://www.foxnews.com/us/trumps-ice-launches-bold-courthouse-migrant-arrest-strategy-fast-track-deportations-biden-avoided?msocid=1cd283b1756f61231883976574c46057>; Conrad Wilson, *ICE Detains Another Asylum-Seeker Outside Portland Courtroom, Legal Petition Says*, OPB (June 6, 2025, 9:30 AM), <https://www.opb.org/article/2025/06/06/asylum-arrest-portland-yzlh/> (hereinafter “Wilson re: Arrest”); Michael Elsen-Rooney, *Their Student Was Detained by ICE. Now this Bronx School is Rallying to Get Him Back*, Chalkbeat New York (June 5, 2025, 7:33pm), <https://www.chalkbeat.org/newyork/2025/06/05/nyc-student-detained-by-ice-supported-by-ellis-prep-bronx-school-community/>; Bennett Haeberle, *In Chicago & Elsewhere, ICE Increases Enforcement in Immigration Court*, 5 Chicago (June 5, 2025, 5:54 PM), <https://www.nbcchicago.com/investigations/in-chicago-and-elsewhere-ice-increases-enforcement-in-immigration-court/3761730/>; Megan Ulu-Lani Boyanton, *At Least Eight People Detained at Denver Immigration Court as ICE Presence Increases, Advocates Say*, The Denver Post (June 5, 2025, 5:04 PM), <https://www.denverpost.com/2025/06/05/denver-immigration-court-arrests-ice-trump-advocates/>; Amy Larson, *Newlywed Couple Separated at Immigration Courthouse by ICE*, The Hill (June 5, 2025, 1:14 PM), <https://thehill.com/homenews/state-watch/5334753-immigration-courthouse-ice-trump-dhs/>; Laura Romero et al., *In a New Tactic, ICE Is Arresting Migrants at Immigration Courts, Attorneys Say*, ABC News (June 4, 2025, 6:37 PM), <https://abcnews.go.com/US/new-tactic-ice-arresting-migrants-immigration-courts-attorneys/story?id=122513021>; Julie Carey, *Cancel, Arrest, Deport: Immigration Lawyer Warns of Emerging ICE Tactic*, NBC Washington (June 4, 2025, 3:01 PM), <https://www.nbcwashington.com/news/local/cancel-arrest-deport-immigration-lawyer-warns-of-emerging-ice-tactic/3927509/>; Brad Schmidt, *Immigration Arrest at Courthouse Marks First for Portland*, The Oregonian (June 3, 2025, 3:22 PM), <https://www.oregonlive.com/politics/2025/06/immigration-arrest-at-courthouse-marks-first-for-portland.html>; Stephen Franklin & Katema Hosseini, *ICE Target Noncitizens As Cases Dismissed in Immigration Court in Chicago*, Borderless (June 3, 2025), <https://borderlessmag.org/2025/06/03/ice-arrests-chicago-immigration-court-trump-detention-immigration-custom-enforcement/>; Conrad Wilson, *ICE Detains Asylum Seeker Outside Portland Immigration Court, Lawyers Say*, OPB (June 2, 2025, 11:01 PM), <https://www.opb.org/article/2025/06/02/ice-immigration-enforcement-detains-asylum-seeker-portland-court/> (hereinafter, “Wilson re: Initial Arrest”); Angélica Franganillo Díaz & Priscilla Alvarez, *ICE Targets Migrants for Arrest at*

Courthouses as Trump Administration Intensifies Deportation Push, CNN (June 2, 2025, 5:00 AM), <https://www.cnn.com/2025/06/02/politics/ice-arrests-migrants-courthouse>; Shelly Bradbury, *Feds Detain Immigrant Family at Denver Courthouse Amid New Trump Strategy*, Denver Post (May 30, 2025, 3:32 PM), <https://www.denverpost.com/2025/05/30/denver-immigration-arrest-courthouse-ice-trump/>; Giulia McDonnell Nieto del Rio, *ICE Arrests at Massachusetts Immigration Courts Target Immigrants Seeking Permission to Stay in US*, Boston Globe (May 30, 2025, 1:39PM), <https://www.bostonglobe.com/2025/05/27/metro/immigration-courts-ice-arrests-massachusetts> (hereinafter, “Nieto del Rio re: Boston Immigr. Ct. Arrests”); Suzanne Gamboa, *Immigration Arrests in Courthouses Have Become the New Deportation Tool, Stripping Migrants of a Legal Process*, NBC News (May 30, 2025, 5:00 AM), <https://www.nbcnews.com/news/latino/immigrations-arrests-ice-deportations-courthouse-legal-process-ice-rcna209671>; Hamed Aleaziz et al., *How ICE is Seeking to Ramp Up Deportations Through Courthouse Arrests*, NY Times (May 30, 2025), <https://www.nytimes.com/2025/05/30/us/politics/ice-courthouse-arrests.html>; Carolina Estrada, *‘This is Very Concerning’: 3 Arrested While Attending Hearings at Immigration Court in Sacramento, Groups Say*, KCRA3 (May 29, 2025, 1:37 PM), <https://www.kcra.com/article/sacramento-immigration-court-arrests-ice/64920625>; Allison Sherry, *Signaling a Policy Shift, ICE Detains a Family Who Showed Up at Denver Immigration Court for a Check-In*, CPR News (May 29, 2025, 1:35 PM), <https://www.cpr.org/2025/05/29/ice-detains-family-denver-immigration-court/>; Daniel Gonzalez & Richard Ruelas, *After Short Break, ICE Resumes Arrests at Phoenix Immigration Court, Changes Keep Tactic*, AZ Central (May 29, 2025, 5:01 AM), <https://www.azcentral.com/story/news/politics/immigration/2025/05/29/phoenix-immigration-court-ice-arrests-resume/83767918007/>; Gwynne Hogan, *Migrants, Protestors, and a Pastor Arrested Inside and Outside Manhattan Immigration Courthouses*, The City (May 28, 2025, 3:16 PM), <https://www.thecity.nyc/2025/05/28/ice-arrests-migrants-26-federal-plaza-pastor/>; (hereinafter, “Hogan re: NYC Immigr. Ct. Arrests”); Olivia Hebert, *ICE Stormed SF Court to Arrest 4 Asylum Seekers, Denounced as Unlawful*, SF Gate (May 28, 2025), <https://www.sfgate.com/bayarea/article/asylum-seekers-arrested-ice-san-francisco-20349387.php>; Tomoki Chien, *Undercover ICE Agents Begin Making Arrests at SF Immigration Court*, The San Francisco Standard (May 27, 2025, 5:32 PM), <https://sfstandard.com/2025/05/27/undercover-ice-agents-make-arrests-san-francisco-court/>; Luis Ferré-Sadurní & Dana Rubinstein, *ICE, Shifting Tactics, Detains High School Student at N.Y.C. Courthouse*, NY Times (May 27, 2025), <https://www.nytimes.com/2025/05/27/nyregion/new-york-student-arrested-ice.html>; Michael Elsen-Rooney, *A Bronx High Schooler Showed Up for a Routine Immigration Court Date. ICE Was Waiting*, Chalkbeat New York (May 26, 2025, 8:35 pm), <https://www.chalkbeat.org/newyork/2025/05/27/bronx-high-school-student-detained-by-immigration-ice-agents/?ref=hellgatenyc.com>; Milena Malaver et al., *ICE Agents in Miami Find New Spot to Carry Out Arrests: Immigration Court*, Miami Herald (May 26, 2025, 1:27 PM), <https://www.miamiherald.com/news/local/immigration/article306900486.html>; Melissa Gomez, *Father Ripped from Family as Agents Target Immigration Courts, Arresting People After Cases Dismissed*, LA Times (May 24, 2025, 10:00AM), <https://www.latimes.com/california/story/2025-05-24/ice-agents-swarm-immigration-courts-arresting-people-after-cases-dismissed> (hereinafter, “Gomez re: Immigr. Ct. Arrests”); Tyche Hendricks, *‘Unprecedented’: ICE Officers Operating Inside Bay Area Immigration Courts, Lawyers Say*, KQED (May 24, 2025), <https://www.kqed.org/news/12041473/unprecedented-ice-officers-operating-inside-bay-area-immigration-courts-lawyers-say>; Ted Hesson & Kristina Cooke, *ICE Arrests Migrants at Courthouses, Opens Door to Fast-Track Deportations*, Reuters (May 23, 2025, 4:35PM), <https://www.reuters.com/world/us/ice-arrests-migrants-courthouses-opens-door-fast-track-deportations-2025-05-23/>; Camilo Montoya-Galvez & Nidia Cavazos, *ICE Ending Migrants’ Court Cases In Order to Arrest and Move to Deport Them*, CBS News (May 23, 2025, 9:53 AM), <https://www.cbsnews.com/news/ice-ending-migrants-court-cases-arrest-move-to-deport-them/>; Arelis R. Hernández & Maria Sacchetti, *Immigrant Arrests at Courthouses Signal New Tactic in Trump’s Deportation Push*, Washington Post (May 23, 2025), <https://www.washingtonpost.com/immigration/2025/05/23/immigration-court-arrests-ice-trump/>; Gustavo Solis, *ICE Agents Swarm San Diego Immigration Court, Arresting People After Their Hearings*, KPBS (May 22, 2025, 5:45PM), <https://www.kpbs.org/news/border-immigration/2025/05/22/ice-agents-swarm-san-diego-immigration-court-arresting-people-after-their-hearings>; Trevor Hughes, *ICE Agents Deploy New Tactic: Arresting People As They Leave Mandatory Court Hearings*, USA Today (May 22, 2025, 1:13 PM), <https://www.usatoday.com/story/news/nation/2025/05/22/ice-arrests-immigration-court-deportation->

Much of the coverage express doubts about the integrity of ICE arrests at immigration courts, describing them as a due process violation and/or a tactic to increase deportations, forum shop, and scare noncitizens into giving up on their immigration cases.⁵ Some coverage alludes to

[tactics/83792357007/](https://chicago.suntimes.com/immigration/2025/05/22/ice-agents-hallways-immigration-court-trump-mass-arrest); Joshua Goodman et al., *They Came to Hearing at Chicago's Immigration Court, Then Got Arrested*, Chicago Sun-Times (May 22, 2025, 3:59PM), <https://chicago.suntimes.com/immigration/2025/05/22/ice-agents-hallways-immigration-court-trump-mass-arrest>; Anders Hagstrom & Bill Melugin, *ICE Begins New, Nationwide Effort to Arrest Illegal Aliens at Immigration Hearings* (May 22, 2025, 1:07 PM), <https://www.foxnews.com/politics/ice-begins-new-nationwide-effort-arrest-illegal-aliens-immigration-hearings>; Joshua Goodman & Gisela Salomon, *ICE Agents Wait in Hallways of Immigration Court as Trump Seeks to Deliver on Mass Arrest Pledge*, Associated Press (May 22, 2025, 1:30 AM), <https://apnews.com/article/immigration-courts-arrests-trump-ice-deportations-fa96435d4ec021cc8ff636b23d80d848>; J. Dale Shoemaker, *ICE Raids Immigration Court in Buffalo*, Investigative Post (May 22, 2025), <https://www.investigativepost.org/2025/05/22/ice-raids-immigration-court-in-buffalo/>; Raphael Romero Ruiz et al., *For 2nd Day, People Attending Phoenix Immigration Hearings Arrested by ICE*, USA Today (May 21, 2025, 11:42 PM), <https://www.usatoday.com/story/news/politics/immigration/2025/05/21/ice-arrests-phoenix-immigration-court/83772323007/?gnt-cfr=1&gca-cat=p>; Gustavo Sagrero Álvarez, *ICE Agents at Seattle Courthouse Arrest People Whose Deportation Hearings are Dismissed*, KUOW (May 21, 5:45 PM), <https://www.kuow.org/stories/ice-agents-at-seattle-courthouse-arrest-people-whose-deportation-hearings-are-dismissed>; Akela Lacy et al. *ICE Agents Are Camped Outside Immigration Courts to Make Arrests*, The Intercept (May 21, 2025, 3:27 PM), <https://theintercept.com/2025/05/21/ice-agents-courts-arrests-immigrants-deport/>; Paul Ingram, *'Mayhem' As ICE Officials Arrest Multiple People at Immigration Court in Phoenix*, AZ Mirror (May 21, 2025, 11:12 AM), <https://azmirror.com/2025/05/21/mayhem-as-ice-officials-arrest-multiple-people-at-immigration-court-in-phoenix/>; Nina Shapiro, *ICE Arrests at WA Immigration Court Spark Fear of Fast-Track Removal*, Seattle Times (May 21, 2025, 6:00 AM), <https://www.seattletimes.com/seattle-news/law-justice/ice-arrests-at-wa-immigration-court-spark-fear-of-fast-track-removal/> (hereinafter, "Shapiro re: ICE Arrests"); Raphael Romero Ruiz & Richard Ruelas, *They Showed Up to Immigration Court in Phoenix. Then Agents Surrounded Them*, USA Today (May 20, 2025), <https://www.usatoday.com/story/news/politics/immigration/2025/05/20/prosecutors-drop-charges-vs-migrants-as-border-agents-wait-outside/83756994007/?gnt-cfr=1&gca-cat=p>

⁵ Kadifa re: Adult Arrests, *supra* n. 4; Salama, *supra* n. 4; Markey, *supra* n. 4; Mose re: ICE in Court; James, *supra* n. 4; Bellisile et al. re: Volunteers Flock to Immigration Courts, *supra* n. 4; Bellisile, *supra* n. 4; Cole et al., *supra* n. 4; Ferré-Sadurní re: Lawsuit, *supra* n. 4; Rivera et al., *supra* n. 4; Cuevas, *supra* n. 4; Abbot, *supra* n. 4; Bernstein, *supra* n. 4; Thamer, *supra* n. 4; Browning & O'Brien, *supra* n. 4; Economist, *supra* n. 4; Ramos, *supra* n. 4; Li & Cheang, *supra* n. 4; Tavernise, *supra* n. 4; Khan, *supra* n. 4; DeAngelis, *supra* n. 4; Seiwel re: ICE Opposition Grows, *supra* n. 4; Singhai re: Volunteers, *supra* n. 4; Kadifa re: Forum Shopping, *supra* n. 4; Moses re: ICE Raids, *supra* n. 4; Yahr, *supra* n. 4; Hogan re: Mamadou Arrest, *supra* n. 4; Cheang, *supra* n. 4; Brigida, *supra* n. 4; Katz, *supra* n. 4; Morrissey, *supra* n. 4; Moore & Zavala, *supra* n. 4; Hobbs re: Sacramento Immigr. Ct. Arrests, *supra* n. 4; Lyons, *supra* n. 4; Oehrl, *supra* n. 4; Bustillo, *supra* n. 4; Bellisile et al. re: Immigration Officers Intensify Arrests, *supra* n. 4; Wilson re: Two Arrests, *supra* n. 4; Kadifa et al., *supra* n. 4; Nieto del Rio re: Inside Boston Immigr. Ct. Arrest, *supra* n. 4; Conklin & Melugin, *supra* n. 4; Wilson re: Arrest, *supra* n.14; Romero et al., *supra* n.14; Carey, *supra* n. 4; Franklin & Hosseini, *supra* n. 4; Bradbury, *supra* n. 4; Nieto del Rio re: Boston Immigr. Ct. Arrests, *supra* n. 4; Gamboa, *supra* n. 4; Aleaziz et al., *supra* n. 4; Gonzalez & Ruelas, *supra* n. 4; Hebert, *supra* n. 4; Chien, *supra* n. 4; Elsen-Rooney re: Dylan Arrest, *supra* n. 4; Malaver et al., *supra* n. 4; Gomez re: Immigr. Ct. Arrests, *supra* n. 4; Hernández & Sacchetti, *supra* n. 4; Solis, *supra* n. 4; Hughes, *supra* n. 4; Goodman et al., *supra* n. 4; Goodman & Salomon, *supra* n. 4; Shoemaker, *supra* n. 4; Ruiz et al., *supra* n. 4; Álvarez, *supra* n. 4; Lacy et al., *supra* n. 4; Ingram, *supra* n. 4; Shapiro re: ICE Arrests, *supra* n. 4; Seiwel re: ICE Snatching, *supra* n. 4; Hendricks, *supra* n. 4; Schmidt, *supra* n. 4.

possible coordination between EOIR and ICE in making these arrests.⁶ Several editorials also decry the arrests as a “set up” and for disregarding due process.⁷

Similarly, eighty-five articles in state, local, and nationwide media outlets have discussed ICE asking immigration judges to dismiss noncitizens’ immigration cases so it can pursue these noncitizens’ expedited removal.⁸ Immigration attorneys also report ICE officials serving pre-signed dismissals based on “non-opposition” to noncitizen respondents at immigration courts without respondents not having notice of ICE’s motion to dismiss their immigration case and an opportunity to oppose it. Much of the coverage on these dismissals casts doubt on their integrity,

⁶ Ferré-Sadurní re: Lawsuit, *supra* n. 4; Bernstein, *supra* n. 4; Khan, *supra* n. 4; Yahr, *supra* n. 4; Aleaziz, *supra* n. 4; Conklin & Melugin, *supra* n. 4; Aleaziz et al., *supra* n. 4; Gomez re: Immigr. Ct. Arrests, *supra* n. 4; Díaz & Alvarez, *supra* n. 4.

⁷ Veronica Cardenas, *I Was Once an ICE Prosecutor. What I See Now in Immigration Courts Is Disturbing*, The Hill (July 17, 2025, 8:00AM), <https://thehill.com/opinion/immigration/5404863-i-was-once-an-ice-prosecutor-what-i-see-now-in-immigration-courts-is-disturbing/>; Brian Strassburger, S.J. & William Critchley-Menor, S.J., *What We Saw During An ICE Arrest & Immigration Court Hearing: The Breakdown of Justice in America*, America: The Jesuit Review (July 11, 2025), <https://www.americamagazine.org/politics-society/2025/07/11/ice-immigration-court-deportation-injustice-251119>; *Trump Disregards Due Process in Our Nation’s Immigration Courts*, San Antonio Express-News (June 27, 2025), <https://www.expressnews.com/opinion/editorial/article/ice-arrest-immigration-court-texas-20395342.php>; *Masked ICE Arrests Raise Urgent Questions About U.S. Immigration Practices*, The Riverdale Press (June 26, 2025), <https://www.riverdalepress.com/stories/masked-ice-arrests-raise-urgent-questions-about-us-immigration-practices.187060>.

⁸ Kadifa re: Adult Arrests, *supra* n. 4; Camacho, *supra* n. 4; Salama, *supra* n. 4; Maurice DuBois et al., *3 Immigration Judges Speak Out About Their Firings: “It Was Arbitrary, Unfair*, CBS News (July 24, 2025, 8:34 PM), <https://www.cbsnews.com/boston/news/immigration-judges-speak-out-firings-arbitrary-unfair/?intcid=CNM-00-10abd1h>; James, *supra* n. 4; Kadifa re: ICE Snatching, *supra* n. 4; Bellisile et al. re: Volunteers Flock to Immigration Courts, *supra* n. 4; Rivera et al., *supra* n. 4; Cuevas, *supra* n. 4; Bellisile, *supra* n. 4; Singhai re: Week at San Diego Immigration Court, *supra* n. 4; Cole et al., *supra* n. 4; Ferré-Sadurní re: Lawsuit, *supra* n. 4; Bernstein, *supra* n. 4; Thamer, *supra* n. 4; Browning & O’Brien, *supra* n. 4; Kadifa re: 4 Arrests, *supra* n. 4; Economist, *supra* n. 4; Regalado & Karlamangla, *supra* n. 4; Li & Cheang, *supra* n. 4; Khan, *supra* n. 4; Seiwel re: ICE Opposition Grows, *supra* n. 4; Vertuno, *supra* n. 4; Seiwel re: ICE Snatching, *supra* n. 4; Gomez re: Faith Leaders, *supra* n. 4; Bremer, *supra* n. 4; May & Marr, *supra* n. 4; Kadifa re: Forum Shopping, *supra* n. 4; Yahr, *supra* n. 4; Hogan re: Mamadou Arrest, *supra* n. 4; Cheang, *supra* n. 4; Brigida, *supra* n. 4; Marnin, *supra* n. 4; Katz, *supra* n. 4; Shapiro re: ICE Tactic Change, *supra* n. 4; Morrissey, *supra* n. 4; Moore & Zavala, *supra* n. 4; Ferré-Sadurní re: Lander Escort, *supra* n. 4; Celeste, *supra* n. 4; Oehrli, *supra* n. 4; Garcia, *supra* n. 4; Lyons, *supra* n. 4; Bustillo, *supra* n. 4; Ferré-Sadurní re: Inside NYC Immigr. Cts., *supra* n. 4; Bellisile et al. re: Immigration Officers Intensify Arrests, *supra* n. 4; Taylor et al., *supra* n. 4; Julia Ainsely, *Trump Admin Tells Immigration Judges to Dismiss Cases in Tactic to Speed Up Arrests*, NBC News (June 11, 2025, 5:00AM), <https://www.nbcnews.com/politics/national-security/trump-admin-tells-immigration-judges-dismiss-cases-tactic-speed-arrest-rcna212138>; Wilson re: Two Arrests, *supra* n. 4; Saavedra & Arnold, *supra* n. 4; Weber, *supra* n. 4; Nieto del Rio re: Inside Boston Immigr. Ct. Arrest, *supra* n. 4; Conklin & Melugin, *supra* n. 4; Wilson re: Arrest, *supra* n. 4; Larson, *supra* n. 4; Romero et al., *supra* n. 4; Carey, *supra* n. 4; Schmidt, *supra* n. 4; Franklin & Hosseini, *supra* n. 4; Wilson re: Initial Arrest, *supra* n. 4; Díaz & Alvarez, *supra* n. 4; Bradbury, *supra* n. 4; Nieto del Rio re: Boston Immigr. Ct. Arrests, *supra* n. 4; Gamboa, *supra* n. 4; Aleaziz et al., *supra* n. 4; Sherry, *supra* n. 4; Gonzalez & Ruelas, *supra* n. 4; Noriega, *supra* n. 4; Hogan re: NYC Immigr. Ct. Arrests, *supra* n. 4; Chien, *supra* n. 4; Elsen-Rooney re: Dylan Arrest, *supra* n. 4; Malaver et al., *supra* n. 4; Gomez re: Immigr. Ct. Arrests, *supra* n. 4; Hendriks, *supra* n. 4; Montoya-Galvez & Cavazos, *supra* n. 4; Hernández & Sacchetti, *supra* n. 4; Hughes, *supra* n. 4; Goodman et al., *supra* n. 4; Hagstrom & Melugin, *supra* n. 4; Goodman & Salomon, *supra* n. 4; Shoemaker, *supra* n. 4; Ruiz et al., *supra* n. 4; Álvarez, *supra* n. 4; Lacy et al., *supra* n. 4; Ingram, *supra* n. 4; Shapiro re: ICE Arrests, *supra* n. 4.

describing them as a violation of due process and a tactic to deport noncitizens without hearings.⁹ Several articles also express concerns about possible coordination between EOIR and ICE in dismissals.¹⁰ And some coverage even suggests that EOIR is firing immigration judges for refusing to dismiss cases.¹¹

Arrests and dismissals at immigration courts have outraged Americans around the country. Opposition to these actions and doubts about their legality have prompted mass protests at immigration courts in New York, Seattle, San Francisco, and elsewhere.¹² It has also prompted clergy, political leaders, and other members of the public to accompany noncitizens to their immigration court dates to document arrests and dismissals, attempt to stop the former,

⁹ James, *supra* n. 4; Cole et al., *supra* n. 4; Ferré-Sadurní re: Lawsuit, *supra* n. 4; Cuevas, *supra* n. 4; Bernstein, *supra* n. 4; Browning & O'Brien, *supra* n. 4; Kadifa re: 4 Arrests, *supra* n. 4; Li & Cheang, *supra* n. 4; Khan, *supra* n. 4; Kadifa re: Forum Shopping, *supra* n. 4; Yahr, *supra* n. 4; Hogan re: Mamadou Arrest, *supra* n.2; Cheang, *supra* n. 4; Brigida, *supra* n. 4; Moore & Zavala, *supra* n. 4; Lyons, *supra* n. 4; Oehrli, *supra* n. 4; Garcia, *supra* n. 4; Bustillo, *supra* n. 4; Ferré-Sadurní re: Inside NYC Immigr. Cts., *supra* n. 4; Bellisile et al. re: Immigration Officers Intensify Arrests, *supra* n. 4; Wilson re: Two Arrests, *supra* n. 4; Saavedra & Arnold, *supra* n. 4; Nieto del Rio re: Inside Boston Immigr. Ct. Arrest, *supra* n. 4; Conklin & Melugin, *supra* n. 4; Wilson re: Arrest, *supra* n. 4; Romero et al., *supra* n. 4; Carey, *supra* n. 4; Franklin & Hosseini, *supra* n. 4; Bradbury, *supra* n. 4; Nieto del Rio re: Boston Immigr. Ct. Arrests, *supra* n. 4; Gamboa, *supra* n. 4; Aleaziz et al., *supra* n. 4; Chien, *supra* n. 4; Elsen-Rooney re: Dylan Arrest, *supra* n. 4; Malaver et al., *supra* n. 4; Gomez re: Immigr. Ct. Arrests, *supra* n. 4; Hernández & Sacchetti, *supra* n. 4; Hughes, *supra* n. 4; Ruiz et al, *supra* n. 4; Lacy et al., *supra* n. 4; Shapiro re: ICE Arrests, *supra* n. 4; Seiwel re: ICE Snatching, *supra* n. 4; Hendricks, *supra* n. 4; Seiwel re: ICE Opposition Grows, *supra* n. 4.

¹⁰ Ferré-Sadurní re: Lawsuit, *supra* n. 4; Bernstein, *supra* n. 4; Khan, *supra* n. 4; Yahr, *supra* n. 4; Conklin & Melugin, *supra* n. 4; Aleaziz et al., *supra* n. 4; Díaz & Alvarez, *supra* n. 4; Schmidt, *supra* n. 4.

¹¹ Dubois et al., *supra* n. 8.

¹² Thamer, *supra* n. 4; Browning & O'Brien, *supra* n. 4; Alicia Victoria Lozano, *Violent Clashes at San Francisco Immigration Court Won't Deter Protestors, Organizers Say*, NBC News (July 10, 2025, 4:43 PM), <https://www.nbcnews.com/news/us-news/violent-clashes-san-francisco-immigration-court-wont-deter-protesters-rcna218059>; Sarah Rumpf-Whitten, *Watch: ICE Agents Fight Off Masked Mob Outside Blue City Immigration Court*, FOX News (July 10, 2025, 1:12 PM), <https://www.foxnews.com/us/watch-ice-agents-fight-off-masked-mob-outside-blue-city-immigration-court>; Shay Arthur, *Crowd Gathers for Immigration Rally at Memphis Court*, WREG Memphis (July 8, 2025, 12:07 PM), <https://wreg.com/news/local/crowd-gathers-for-immigration-rally-at-memphis-court/>; Ramos, *supra* n. 4; Regalado & Karlamangla, *supra* n. 4; Li & Cheang, *supra* n. 4; Khan, *supra* n. 4; DeAngelis, *supra* n. 4; Stephania Jimenez, *PSL San Antonio Organizes Event to Educate Community on Immigration Laws Amid Rising ICE Deportations*, KSAT (July 1, 2025, 10:42 PM), <https://www.ksat.com/news/local/2025/07/02/psl-san-antonio-organizes-event-to-educate-community-on-immigration-laws-amid-rising-ice-deportations/>; May & Marr, *supra* n. 4; Shapiro re: ICE Tactic Change, *supra* n. 4; Ferré-Sadurní re: Lander Arrest, *supra* n. 4; Moore & Zavala, *supra* n. 4; Greg Micek et al., *Sacramento Immigration Court on Lockdown, Draws Protest After Suspected ICE Operation*, Capradio (June 12, 2025), <https://www.capradio.org/articles/2025/06/12/sacramento-immigration-court-on-lockdown-draws-protest-after-suspected-ice-operation/>; Hobbs re: Sacramento Immigr. Ct. Arrests, *supra* n. 4; Lyons, *supra* n. 4; Ferré-Sadurní re: Inside NYC Immigr. Cts., *supra* n. 4; Bellisile et al. re: Immigration Officers Intensify Arrests, *supra* n. 4; Alvarez, *supra* n. 4; George Kelly & Max Harrison-Caldwell, *Protesters Shut Down Immigration Court After ICE Arrests*, The San Francisco Standard (June 10, 2025, 1:00 PM), <https://sfstandard.com/2025/06/10/protesters-surround-immigration-court-after-ice-arrests/>; Kadifa et al., *supra* n. 4; Weber, *supra* n. 4; Joe Rivano Barros et al., *S.F. Police Arrest Dozens in 2nd Night of Protests Against ICE*, Mission Local (June 9, 2025, 8:16 PM), <https://missionlocal.org/2025/06/sf-mission-march-mobilized-thousands-against-ice/>; Boyanton, *supra* n. 4; Aleaziz et al., *supra* n. 4; Hogan re: NYC Immigr. Ct. Arrests; Ruiz et al, *supra* n. 4.

help arrested noncitizens inform their families.¹³ At least four federal judges have also deemed a few specific arrests at immigration courts unlawful and ordered ICE to release the arrestees,¹⁴ while a class of noncitizens represented by several rights groups has also sued to stop the arrests nationwide.¹⁵

Responsive records will address critical integrity questions left open by existing media coverage. Such records will show the extent that EOIR leadership and support staff have coordinated with ICE ERO leadership to facilitate arrests, dismissals, and enforcement actions in immigration courts.

B. URGENCY TO INFORM THE PUBLIC ABOUT FEDERAL GOVERNMENT ACTIVITY BY A REQUESTER

Additionally, and alternatively, the Council has a compelling need for the records sought. It is primarily engaged in disseminating information. And urgency also exists to inform the public about the topics discussed above.

1. *The Council Primarily Engages in Information Dissemination*

The Council primarily engages in disseminating information and analysis on immigration and other issues. Organizations primarily engaged in information dissemination include not only “media organizations and newspapers,” *Heritage Found. v. Entl. Prot. Agency*, Civil Action No. 23-748, 2023 WL 2954418, *3 (D.D.C. 2023), but also “non-partisan law and public policy group[s]” like Requesters that “regularly write[], publish[], and disseminat[e], information online,” *Brennan Ctr. for Just.*, 498 F. Supp. 3d at 98 (Brennan Center); see also *Ctr. for Pub. Integrity v. U.S. Dep’t of Def.*, 411 F. Supp. 3d 5 (D.D.C. 2019) (Center for Public Integrity); *Protect Dem. Proj. v. U.S. Dep’t of Def.*, 263 F. Supp. 3d 293, 298 (D.D.C. 2017) (Protect Democracy Project); *Am. Civil Liberties Union*, 321 F. Supp. 2d at 29 n.5 (Electronic Privacy Information Center (“EPIC”)).

Like Brennan Center, Protect Democracy Project, EPIC, and Center for Public Integrity, the Council authors factsheets and special reports on proposed and actual immigration policies,

¹³ Salama, *supra* n. 4; Markey, *supra* n. 4; Mose re: ICE in Court; Bellisile et al. re: Volunteers Flock to Immigration Courts, *supra* n. 4; Ferré-Sadurní re: Lawsuit, *supra* n. 4; Belz, *supra* n. 4; Thamer, *supra* n. 4; Strassburger & Critchley-Menor, *supra* n. 5; Ciara Encinas, *Volunteers Describe How They Document ICE Arrests in Immigration Courts*, Fox 5 (July 11, 2025, 4 :55 PM), <https://fox5sandiego.com/news/local-news/san-diego/san-diego-court-ice-arrests/>; Zavala, *supra* n. 4; Joey Safchik, *ICE Handcuffs 71-Year-Old Grandmother, a US Citizen, at San Diego Immigration Court*, 7 San Diego (July 9, 2025, 7 :06 PM), <https://www.nbcsandiego.com/news/local/ice-arrests-71-year-old-grandmother-a-us-citizen-at-san-diego-immigration-court/3865098/>; Ramos, *supra* n. 4; Rossoto, *supra* n. 4; Khan, *supra* n. 4; Singhai re: Volunteers, *supra* n. 4; Gomez re : Faith Leaders, *supra* n. 4; Shapiro re: ICE Tactic Change, *supra* n. 4; Sanchez & Ebrahimji, *supra* n. 4; Ferré-Sadurní re: Lander Arrest, *supra* n. 4; Ferré-Sadurní re: Lander Escort, *supra* n. 4; Micek et al., *supra* n. 4; Stone, *supra* n. 4; Hobbs re: Sacramento Immigr. Ct. Arrests, *supra* n. 4; Estrada re: Two Arrests, *supra* n. 4; Boyanton, *supra* n. 4.

¹⁴ See Markey, *supra* n. 4; Bernstein, *supra* n. 4; Baumhardt, *supra* n. 4; Ramos, *supra* n. 4; Vertuno, *supra* n. 4.

¹⁵ See, e.g., Rivera et al., *supra* n. 4; Abbot, *supra* n. 4; Bellisile, *supra* n. 4; Cole et al., *supra* n. 4; Ferré-Sadurní re: Lawsuit, *supra* n. 4.

some of which shape media coverage in outlets across the nation.¹⁶ It also analyzes immigration data and other government records—including those obtained through FOIA requests like this one—in interactive web reports.¹⁷ And it circulates its reports and factsheets through its website,¹⁸ blog, email newsletters, and an X (formerly known as Twitter) account with 64.9 thousand followers.¹⁹

2. Urgency Exists to Inform the Public

Urgency also exists to inform the public about the extent that EOIR leadership and support staff have coordinated with ICE ERO leadership to facilitate arrests, dismissals, and enforcement actions in immigration courts.

Requisite urgency exists where “the request touches on ‘a matter of current exigency to the American public’” and delay “compromises a significant recognized interest.” *Protect Dem. Proj.*, 263 F. Supp. 3d 293 at 299 (quoting *Al-Fayed v. CIA*, 254 F.3d 300, 310 (D.C. Cir. 2001)). The above topics are exigent to the American public, as demonstrated by the one hundred and twenty plus articles discussing ICE arrests at or near immigration courts cited in this request, the eighty plus articles discussing dismissals of immigration proceedings, and the mass protests against these actions outside immigration courts. See *CREW*, 2025 WL 752367, at *13 (finding urgency to inform the public based on at least fifty articles on the issue); *Am. Civil Liberties Union of No. Cal. v. U.S. Dep’t of Def.*, No. C 06-01698, 2006 WL 1469418, at *6 (N.D. Cal. May 25, 2006) (same); 28 C.F.R. § 16.5(e)(3) (“The existence of numerous articles published on a given subject can be helpful to establishing the requirement that there be an ‘urgency to inform’ the public on the topic.”).

Delayed production of responsive records would compromise the ongoing public debate about the propriety of ICE arrests at immigration courts and the dismissal of immigration cases,

¹⁶ See, e.g., *Trump-Backed Mass Deportations Would Cost Billions*, Report Says, CBS News (Oct. 3, 2024), <https://www.cbsnews.com/video/trump-backed-mass-deportations-would-cost-billions-report/> (discussing Am. Immigr. Council, *Mass Deportation: Devastating Costs to America, Its Budget and Economy* (Oct. 2, 2024), <https://www.americanimmigrationcouncil.org/report/mass-deportation/>); Emma Goldberg, *What if Trump Deported Millions of Immigrants*, The New York Times (Oct. 22, 2024), https://www.nytimes.com/interactive/2024/10/22/us/elections/trump-deportation.html?unlocked_article_code=1.Uk4.Pjao.990iYFTTpEl6 (same); *What Trump’s Mass Deportation Plan Might Look Like If He Wins the Election*, 60 Minutes (Oct. 27, 2024), <https://www.youtube.com/watch?v=WjCHjwLSMFI> (same); *Mass Deportations*, Last Week Tonight (Oct. 27, 2024), <https://www.youtube.com/watch?v=0UEhMDAIX1Y> (same); *The Costs of Mass Deportation? Expert Breaks Down Trump’s Immigration Plan*, Amanpour & Company, (Oct. 28, 2024), <https://www.youtube.com/watch?v=Dmfo3atidKE> (same).

¹⁷ See Am. Immigr. Council, *Torrance County Detention Facility: Troubling Role in Detaining Haitian Migrants During the 2021 Del Rio Incident* (2024), <https://www.americanimmigrationcouncil.org/foia/torrance-detention-facility>; Am. Immigr. Council, *Ohio, We Have a Problem: Border Patrol & Local Law Enforcement’s Patterns & Tactics of Abuse in Ohio’s Immigration Enforcement* (2024), <https://www.americanimmigrationcouncil.org/foia/ohio-border-patrol-abuse>; Am. Immigr. Council, *Refugee Resettlement in U.S. Cities* (2019), https://data.americanimmigrationcouncil.org/en/refugee-resettlement-us/#exploratory_tool

¹⁸ The Council’s website received 4,506,460 views from 2,952,034 different users in 2024.

¹⁹ See <https://x.com/immrcouncil>.

especially the concerns that EOIR is coordinating with ICE to facilitate arrests and dismissals. *Cf. CREW*, 2025 WL 752367, at *13 (expediting a request for records about the U.S. DOGE Service); *Protect Dem. Proj.*, 263 F. Supp. 3d 293 at 299 (expediting a request for records about a possible unlawful airstrike on Syria); *Am. Civil Liberties Union of N. Cal. v. U.S. Dep't of Def.*, No. C. 06-01698, 2006 WL 1469418, at *6-7 (N.D. Cal. May 25, 2006) (expediting a request for records about possible unlawful military surveillance of protestors); *Freedom Coalition of Doctors for Choice v. Ctrs. For Disease Control & Prevention*, 2:23-cv-102, 2024 WL 69084, at *14 (N.D. Tex. Jan. 5, 2024) (expediting a request disputing the effectiveness of COVID-19 vaccines).

IV. FEE WAIVER REQUEST

Requestors seek a fee waiver since “disclosure of the requested records is in the public interest.” 5 U.S.C. § 552(a)(4)(A)(iii). EOIR must construe “the FOIA fee waiver provision . . . liberally . . . in favor of waivers for noncommercial requesters” like Requesters. *Schoenman v. FBI*, 604 F. Supp. 2d 174, 188 (D.D.C. 2009). Disclosure is in the public interest where it (A) “is likely to contribute significantly to public understanding of the operations or activities of the government” and (B) “is not primarily in the commercial interest of the [R]equesters.” 5 U.S.C. § 552(a)(4)(A)(iii); see also 28 C.F.R. § 16.10(k)(1). Requesters satisfy both requirements.

A. DISCLOSURE OF THE INFORMATION IS IN THE PUBLIC INTEREST

Disclosing the requested records is likely to contribute significantly to the public’s understanding of the extent that EOIR leadership and support staff have coordinated with ICE ERO leadership to facilitate arrests, dismissals, and enforcement actions in immigration courts.

EOIR must consider two factors when assessing a disclosure’s contribution to public understanding of a government activity or operation, see 28 C.F.R. § 16.10(k)(2): (i) whether the request has a “direct and clear” rather than “remote or attenuated” connection to “identifiable operations or activities of the federal government”; and (ii) whether disclosure “would be likely to contribute significantly to public understanding of those operations or activities.” *Id.* § 16.10(k)(2)(i)-(ii). Each factor supports a fee waiver here.

1. Request Has a Direct and Clear Connection to Government Operations or Activities

First, this request has a direct and clear relation to the following governmental operations and activities: the extent that EOIR leadership and support staff have coordinated with ICE ERO leadership to facilitate arrests, dismissals, and enforcement actions in immigration courts.

2. Records Sought Will Contribute Significantly to Public Understanding of the Above

Second, disclosing the records sought will “contribute significantly to public understanding of” the above activities. *Id.* § 16.10(k)(2)(ii). Such contribution exists where “[d]isclosure of the requested information [is] meaningfully informative about [these] activities” and “contribute[s]

to the understanding of a reasonably broad audience of persons interested in the subject, as opposed to the individual understanding of the requester.” *Id.* § 16.10(k)(2)(ii)(A)-(B). Both criteria are satisfied here.

i. DISCLOSURE OF RECORDS IS MEANINGFULLY INFORMATIVE

Disclosing requested records will be meaningfully informative about the extent that EOIR leadership and support staff have coordinated and cooperated with ICE ERO leadership to facilitate arrests, dismissals, and enforcement actions in immigration courts. Disclosure is meaningfully informative where disclosed information is not “in the public domain, in either the same or a substantially identical form.” *Id.* § 16.10(k)(2)(ii)(A).

Here, as demonstrated by the media coverage cited above, the public only knows that ICE is arresting noncitizens at or near immigration courts after moving to dismiss their immigration cases and that immigration judges are granting many dismissals, thereby allowing ICE to pursue expedited removal.²⁰ Media coverage has alluded to, and expressed concern about, possible EOIR coordination with ICE.²¹ Public knowledge does not extend to the extent or specifics of any such coordination. Requested records are therefore “meaningfully informative” about each of these activities.

ii. DISCLOSURE OF RECORDS CONTRIBUTES TO UNDERSTANDING OF A REASONABLY BROAD AUDIENCE

Disclosing requested records will contribute to the understanding of a reasonably broad audience of persons interested in the extent that EOIR leadership and support staff have coordinated and cooperated with ICE ERO leadership to facilitate arrests, dismissals, and enforcement actions in immigration courts.

Requesters presumably satisfy this consideration as representatives of the news media. *Id.* § 16.10(k)(2)(ii)(B). They both “gather[] information of potential interest to a segment of the public, use[] [their] editorial skills to turn the raw materials into a distinct work, and distribute[] that work to an audience.” *Id.* § 16.10(b)(6); see also *Serv. Women’s Action Network v. Dep’t of Def.*, 888 F. Supp. 2d 282, 287-88 (D. Conn. 2012) (finding that ACLU is a news media representative); cf. *Elec. Privacy Info. Ctr. v. Dep’t of Def.*, 241 F. Supp. 2d 5, 10-15 (D.D.C. 2003) (finding that an organization similar to the Council is a news media representative).

Additionally, and alternatively, the ongoing and extensive media coverage in nationwide, state, and local outlets about the dismissal of immigration cases and ICE arrests at and near immigration courts shows that these matters interest a reasonably broad audience. Requesters

²⁰ See generally Media articles cited in footnotes 4-13.

²¹ Ferré-Sadurní re: Lawsuit, *supra* n. 4; Bernstein, *supra* n. 4; Khan, *supra* n. 4; Yahr, *supra* n. 4; Conklin & Melugin, *supra* n. 4; Aleaziz et al., *supra* n. 4; Díaz & Alvarez, *supra* n. 4; Schmidt, *supra* n. 4.

intend and are well-equipped to inform this audience about the information contained in responsive records, as they are experts in educating the public on immigration issues.

As detailed further in the expedited processing section, the Council analyzes government records—including those obtained through FOIA requests like this one—in interactive web reports and other publications available for free on its website.²² And it circulates these publications for free through its website,²³ blog, email newsletters, and an X account with 64.9 thousand followers. It intends to publish content about records obtained from this request on its website and otherwise disseminate that content to its readers and the larger public.

Similarly, LatinoJustice PRLDEF produces newsletters, blogs, reports, opinion, editorials, and video interviews about the constitutional rights and equal protection of Latinos, immigrants, and other marginalized communities.²⁴ And it circulates these publications for free through its social media accounts. All of its materials are free and available to the public on its website.

In sum, Requesters intend to analyze the records they receive from this request and educate a broad audience of the interested public about them. And, Requesters have a demonstrated ability to do so.

B. REQUESTERS' LACK OF COMMERCIAL INTEREST

Turning to commercial interest, disclosure is not primarily in Requesters' commercial interest. As nonprofits, Requesters have no commercial interest in the records requested. *See Am. Ctr. for L. & Just. v. U.S. Dep't of Homeland Sec.*, 573 F. Supp. 3d 78, 84 (D.D.C. 2021) (“[N]onprofit organizations by definition have no commercial interests.”); *Am. Immigr. Council v. U.S. Dep't of Homeland Sec.*, 82 F. Supp. 3d 396, 406 (D.D.C. 2015) (finding that the Council has no such interest in its record requests). Rather, the request furthers Requesters' work to increase public understanding of immigration processes, including the extent that EOIR leadership and support staff have coordinated and cooperated with ICE ERO leadership to facilitate arrests, dismissals, and enforcement actions in immigration courts.

Alternatively, and additionally, the public interest in obtaining a better understanding of EOIR's actions discussed above exceeds any commercial interest that EOIR may ascribe to Requesters in records responsive to this request.

²² See, e.g., Torrance County Detention Facility: Troubling Role in Detaining Haitian Migrants During the 2021 Del Rio Incident, *supra* n. 15; Ohio, We Have a Problem: Border Patrol & Local Law Enforcement's Patterns & Tactics of Abuse in Ohio's Immigration Enforcement, *supra* n. 15; Refugee Resettlement in U.S. Cities, *supra* n. 15.

²³ The Council's website received 4,506,460 views from 2,952,034 different users in 2024.

²⁴ See, e.g., LatinoJustice PRLDEF, 100 Days Later: The Harm So Far to Latinx Communities (April 2025), <https://www.latinjustice.org/en/pressreport/100-days-later-harm-so-far-latinx-communities>; LatinoJustice PRLDEF, A Promise to Harm: What's at Stake for the Latino Community in Project 2025 (Oct. 2024), <https://www.latinjustice.org/en/pressreport/promise-harm-whats-stake-latinx-community-project-2025>.

Thank you for your attention to this request. If you have any questions regarding this request, please do not hesitate to contact us.

Very truly yours,

/s/ Chris Opila _____

Christopher (“Chris”) Opila
Staff Attorney (Transparency)
American Immigration Council
PMB2026
2001 L Street N.W., Suite 500
Washington, DC 20036
202-507-7699 | copila@immcouncil.org

/s/Rex Chen _____

Rex Chen
Supervising Counsel for Immigrant Rights
LatinoJustice PRLDEF,
475 Riverside Drive Suite 1901
New York, NY 10115
212-219-3360 | rchen@latinojustice.org



July 28, 2025

Via Public Access Link Portal & Certified Mail

U.S. Department of Justice
Executive Office for Immigration Review
Office of General Counsel – FOIA Service Center
5107 Leesburg Pike, Suite 1903
Falls Church, VA 22041

Director of Public Affairs
Office of Public Affairs
Department of Justice,
950 Pennsylvania Avenue NW.
Washington, DC 20530-0001

Re: Freedom of Information Act Request on Terminations of Immigration Proceedings and ICE Arrests at Immigration Courts

Dear FOIA Officer:

The American Immigration Council (the “Council”) and LatinoJustice PRLDEF (collectively, “Requesters”) submit this request to the Executive Office for Immigration Review (“EOIR”) under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552.

Since around the middle of May 2025, U.S. Immigration Customs and Enforcement (“ICE”) has been arresting noncitizens in or near EOIR immigration courts when noncitizens appear for a hearing in their immigration cases. ICE has also sought to dismiss these cases so it can seek the expedited removal of respondent noncitizens. Requesters seek certain records about these arrests and dismissals as well as expedited processing and a fee waiver.

I. REQUEST FOR INFORMATION

Requesters seek all emails,¹ correspondence, calendar entries, meeting notes, text messages, Signal messages, WhatsApp messages, Microsoft Teams messages, and other similar

¹ Requested emails exclude duplicates. (E.g. agencies should only produce one record of an email chain that contains all emails in that chain, rather than a record for each new email in the chain that contains all emails in the chain prior to that email).

communication records² between one or more individuals listed in Column A of the table below and one or more individuals listed in Column B about a topic listed in Column C from April 1, 2025, to the date of a reasonable search for responsive records.

A	B	C
The Chief Immigration Judge	ICE Principal Legal Advisor	Expedited removal
A Regional Deputy Chief Immigration Judge (“RDCJ”)	ICE Executive Deputy Principal Legal Advisor	An ICE enforcement operation in or near an immigration court
An Assistant Chief Immigration Judge (“ACIJ”)	ICE Deputy Principal Legal Advisor for Field Legal Operations	An ICE arrest in or near an immigration court
A Court Administrator	An ICE Office of the Principal Legal Advisor (“OPLA”) Field Location’s Chief Counsel	Dismissal or termination of immigration cases or proceedings in immigration court ³
	An ICE OPLA Field Location’s Deputy Chief Counsel	

II. FORMAT OF PRODUCTION

Requesters seek responsive electronic records in a machine-readable, native file format, with all metadata and load files. Requesters ask EOIR to produce responsive materials in their entirety, including all attachments, appendices, enclosures, and/or exhibits, in a text-searchable, static-image format (PDF), in the best image quality in the agency’s possession, and that the records be provided in separate, Bates-stamped files.

III. EXPEDITED PROCESSING

Requesters seek expedited processing of this request and certify that the statements herein are “true and correct” pursuant to 28 C.F.R. § 16.5(e)(3). FOIA obligates EOIR to process requests expeditiously in two cases: (i) those where a requester “demonstrates a compelling need”—such as “urgency to inform the public concerning actual or alleged Federal Government activity” if the requester is “primarily engaged in disseminating information,” 5 U.S.C. § 552(a)(6)(E)(i), (v)—and (ii) “in other cases determined by the agency,” *id.* § 552(a)(6)(E)(i), which, for the Department of Justice, include “[a] matter of widespread and exceptional media interest in which there exist

² Responsive records should be construed as exclusive of records that is part of a noncitizen’s record of proceedings (e.g., a motion to dismiss).

³ Responsive records should be construed as exclusive of records that are part of a noncitizen’s record of proceedings (e.g., a motion to dismiss).

possible questions about the government's integrity which affect public confidence,” 28 C.F.R. § 16.5(e)(1)(ii), (iv). Both cases exist here.

A. A MATTER OF WIDESPREAD AND EXCEPTIONAL INTEREST RAISING GOVERNMENT INTEGRITY CONCERNS

ICE arrests at and near immigration courts and immigration judges' dismissal of immigration cases to facilitate expedited removal are matters of widespread and exceptional media interest in which there exist possible questions about the government's integrity which affect public confidence.

Fifty articles on an issue make it a matter of widespread and exceptional public interest. *Citizens for Resp. & Ethics in Wash. v. U.S. DOGE Serv.*, Case No. 25-cv-511 (CRC), 2025 WL 752367, at *13 (D.D.C. Mar. 10, 2025) (hereinafter “CREW”) *see also* *Brennan Ctr. for Just. v. Dep't of Com.* 498 F. Supp. 3d 87, 97 (D.D.C. 2020). A “handful of articles” also establishes such interest where the articles are “in a variety of publications” and “repeatedly reference the ongoing national discussion.” *Am. Civ. Liberties Union v. Dep't of Just.*, 321 F. Supp. 2d 24, 32 (D.D.C. 2004).

Here, one hundred and twenty one articles in nationwide, state, local, and international media outlets have covered ongoing ICE arrests at or near immigration courts in Atlanta, Boston, Buffalo, Charlotte, Denver, Houston, Los Angeles, Miami, New York, Portland, Phoenix, Sacramento, San Diego, San Francisco, Seattle, and elsewhere throughout the country since May 20, 2025.⁴ This equates to almost two articles per day for sixty-six days.

⁴ Margaret Kadifa, *ICE Arrests All Adults Without Children at S.F. Immigration Court Today*, Mission Local (July 25, 2025, 1:05 PM), <https://missionlocal.org/2025/07/hed-ice-steps-up-arrests-at-s-f-immigration-court/> (hereinafter, “Kadifa re: Adult Arrests”); Pedro Camacho, *ICE Arrests Migrant Deemed Mentally Impaired by Judge as He Exits Immigration Court: ‘He’s Clearly Not Understanding the Questions’*, The Latin Times (July 25, 2025, 10:36 AM), <https://www.latintimes.com/ice-arrests-migrant-deemed-mentally-impaired-judge-he-exits-immigration-court-hes-clearly-not-587576>; Jordan Salama, *When ICE Agents Are Waiting Outside the Courtroom*, The New Yorker (July 25, 2025), <https://www.newyorker.com/news/the-lede/when-ice-agents-are-waiting-outside-the-courtroom>; Eileen Markey, *Punished for Playing by the Rules: The Deliberate Cruelty of Trump’s Deportation Regime*, The Nation (July 24, 2025), <https://www.thenation.com/article/society/ice-trump-detention-regime-cruelty/>; Dean Moses, *ICE in Court: Feds Snatch More Immigrants as Lander, Williams Demand Safety Inspection of Detainment Center*, AMNY (July 23, 2025), <https://www.amny.com/politics/ice-immigrants-court-lander-williams-07232025/> (hereinafter, “Mose re: ICE in Court”); Danielle James, *ICE Arrests at Check-Ins, Court Hearings Are on the Rise. Michigan Is No Exception*, MLIVE (July 21, 2025, 7:10 AM), <https://www.mlive.com/politics/2025/07/ice-arrests-at-check-ins-court-hearings-are-on-the-rise-michigan-is-no-exception.html>; Margaret Kadifa, *ICE Agents Keep Snatching Asylum Seekers Immediately After Their Court Hearings*, Mother Jones (July 21, 2025), <https://www.motherjones.com/politics/2025/07/ice-agents-arrest-asylum-seekers-after-court-hearings-san-francisco/> (hereinafter, “Kadifa re: ICE Snatching”); Esmeralda Perez, *San Diego Immigration Attorney Weighs in on Lawsuit Challenging ICE Courthouse Arrests*, CBS8 (July 20, 2025, 10:19 PM), <https://www.cbs8.com/article/news/local/san-diego-attorney-weighs-in-on-lawsuit-challenging-ice-courthouse-arrests/509-79fec519-eb00-442c-b479-4522f423be7c>; Martha Bellisile et al., *Volunteers Flock to Immigration Courts to Support Migrants Arrested in the Hallways*, ABC News (July 20, 2025, 8:38 AM), <https://abcnews.go.com/US/wireStory/volunteers-flock-immigration-courts-support-migrants-arrested-hallways->

[123902561](#) (hereinafter “Bellisile et al. re: Volunteers Flock to Immigration Courts”); Eduardo Cuevas, ‘Escalation:’ *Federal Agents Now Detaining People with Active Immigration Cases*, USA Today (July 18, 2025, 11:26 AM), <https://www.usatoday.com/story/news/nation/2025/07/18/migrants-immigration-court-trump-crackdown/84614161007/>; Mark Rivera et al., *ICE Arrests at Immigration Court in Chicago, Nationwide Labeled ‘Unlawful’ in New LawsUIT*, ABC 7 Chicago (July 18, 2025, 8:36 PM), <https://abc7chicago.com/post/us-immigration-news-ice-arrests-courts-chicago-nationwide-labeled-unlawful-new-lawsuit-trump-administration/17186490/>; Jeff Abbot, *Texas Based Immigration Advocacy Group Sues Trump Administration Over Courthouse Arrests*, El Paso Times (July 18, 2025, 5:02 AM), <https://www.elpasotimes.com/story/news/immigration/2025/07/18/texas-immigration-advocacy-group-challenges-ices-courthouse-arrests/85255298007/>; Emily Belz, *In Immigration Court, Christians Show Up to Fill the Back Benches*, Christianity Today (July 18, 2025), <https://www.christianitytoday.com/2025/07/immigration-court-observation-ice-arrests/>; David Baratz, *See How ICE Targets Immigrants Appearing at Routine Court Hearings*, USA Today (July 17, 2025, 3:15 PM), <https://www.usatoday.com/picture-gallery/news/nation/2025/07/17/how-ice-targets-immigrants-at-court-hearings-photos/85259555007/>; Martha Bellisile, *Homeland Security Officials Defend Immigration Court Arrests After Being Sued*, Associated Press (July 17, 2025, 2:04 PM), <https://apnews.com/article/ice-immigration-court-immigrants-a5190ada4a6019f84d76e62c11c44e30/>; Swasti Singhai, *Five Days, 12 Arrests: A Week Inside San Diego Immigration Court*, Times of San Diego (July 17, 2025, 7:41 AM), <https://timesofsandiego.com/politics/2025/07/17/arrests-immigration-court-trump-anxiety-chaos/> (hereinafter, “Singhai re: Week at San Diego Immigration Court”); Devan Cole et al., *Trump Administration Sued Over ICE Arrests at Immigration Courthouses*, CNN (July 16, 2025, 6:23 PM), <https://www.cnn.com/2025/07/16/politics/ice-immigration-courthouse-arrests-lawsuit/>; Luis Ferré-Sadurní, *Immigrants File Class-Action Lawsuit to Stop ICE Courthouse Arrests*, NY Times (July 16, 2025), <https://www.nytimes.com/2025/07/16/nyregion/trump-ice-arrests-lawsuit-immigrants.html> (hereinafter, “Ferré-Sadurní re: Lawsuit”); Maxine Bernstein, *Federal Judge in Oregon: Homeland Security ‘Tricked’ Asylum Seeker Before Arrest at Immigration Court*, The Oregonian (July 15, 2025, 10:47 AM), <https://www.oregonlive.com/pacific-northwest-news/2025/07/federal-judge-in-oregon-homeland-security-tricked-asylum-seeker-before-arrest-at-immigration-court.html>; Sarah Thamer, *Advocates Denounce ICE Arrests at Fort Snelling Immigration Court*, MPR News (July 15, 2025, 4:00 AM), <https://www.mprnews.org/story/2025/07/15/advocates-protest-ice-arrests-at-immigration-court/>; Alex Baumhardt, *Asylum Seeker Taken by ICE Outside Portland Immigration Court to Be Immediately Released*, Oregon Capital Chronicle (July 14, 2025, 5:24 PM), <https://oregoncapitalchronicle.com/2025/07/14/asylum-seeker-taken-by-ice-outside-portland-immigration-court-to-be-immediately-released/>; Ciara Encinas, *Volunteers Describe How They Document ICE Arrests in Immigration Courts*, Fox 5 (July 11, 2025, 4:55 PM), <https://fox5sandiego.com/news/local-news/san-diego/san-diego-court-ice-arrests/>; Gerardo Zavala, *ICE Arrests Asylum Seeker After Sacramento Court Hearing*, CAPRADIO (July 11, 2025), <https://www.capradio.org/articles/2025/07/11/ice-arrests-asylum-seeker-after-sacramento-court-hearing/>; Paige Browning & John O’Brien, *Fears of Arrests Cause Tension at Seattle Immigration Court*, KUOW (July 10, 2025, 5:58 PM), <https://www.kuow.org/stories/fears-of-ice-arrests-cause-tension-at-seattle-immigration-court/>; Margaret Kadifa, *ICE Arrests 4 People After Immigration Court Hearings in San Francisco*, Mission Local (July 10, 2025, 12:08 PM), <https://missionlocal.org/2025/07/ice-arrests-four-people-after-they-appear-in-immigration-court/> (hereinafter, “Kadifa re: 4 Arrests”); *What Goes On in America’s Immigration Courts*, Economist (July 10, 2025), <https://www.economist.com/united-states/2025/07/10/what-goes-on-in-americas-immigration-courts> (hereinafter “Economist”); Francesca Regalado & Soumya Karlamangla, *Tensions Escalate in San Francisco over Immigration Enforcement*, NY Times (July 9, 2025), <https://www.nytimes.com/2025/07/09/us/ice-immigration-protest-san-francisco.html>; John Ramos, *Peruvian Women Detained by ICE in San Francisco Freed After Judge’s Ruling*, CBS News (July 8, 2025, 6:35 PM), <https://www.cbsnews.com/sanfrancisco/news/san-francisco-ice-woman-freed-immigration-court/>; Tom Li & Ko Lyn Cheang, *Video: Protestors Cling to Departing ICE Van After Arrest at S.F. Immigration Court*, San Francisco Chronicle (July 8, 2025, 5:34 PM), <https://www.sfchronicle.com/sf/article/protesters-cling-ice-van-chaos-immigration-court-20761721.php>; Henry Rosoff, *ICE Escalates Immigration Court Arrests Outside NYC Court*, PIX11 (July 8, 2025, 5:18 PM), <https://pix11.com/news/local-news/manhattan/ice-escalates-immigration-arrests-outside-nyc-court/>; Sabrina

Tavernise, *Against Illegal Immigration, but Married to Someone Here Illegally*, NY Times (July 8, 2025), <https://www.nytimes.com/2025/07/08/us/trump-illegal-immigration-raids-arkansas.html>; Nisa Khan, *When ICE Is Waiting at Immigration Court, What Can Advocates Do?*, KQED (July 7, 2025), <https://www.kqed.org/news/12047018/how-legal-experts-advocates-are-responding-to-the-detention-of-asylum-seekers>; Emma Seiwell, *ICE Opposition Grows, With Lawmakers, Attorneys Decrying Courthouse Arrests as a Violation of Due Process*, NY Daily News (July 5, 2025, 6:00 AM), <https://www.nydailynews.com/2025/07/05/ice-opposition-grows-with-lawmakers-attorneys-decrying-courthouse-arrests-a-violation-of-due-process/> (hereinafter “Seiwell re: ICE Opposition Grows”); Jenna DeAngelis, *NYC Officials Lead “ICE Watch And Accompaniment” Effort at Federal Immigration Court. Here’s What It Means*, CBS News (July 3, 2025, 6:59 PM), <https://www.cbsnews.com/newyork/news/nyc-ice-watch-federal-immigration-court/>; Jim Vertuno, *Honduran Family Freed From Detention After Lawsuit Against ICE Courthouse Arrests*, Associated Press (July 3, 2025, 6:14 PM), <https://apnews.com/article/ice-family-children-lawsuit-release-ef8d764aebec8ba1b67bafc9080a563d>; Swasti Singhai, *San Diego Volunteers Bear Witness Daily as ICE Continues Courtroom Arrests*, Times of San Diego (July 3, 2025, 3:41 PM), <https://timesofsandiego.com/life/2025/07/03/san-diego-community-bears-witness-as-ice-continues-courtroom-arrests/> (hereinafter, “Singhai re: Volunteers”); Emma Seiwell, *ICE Agents Now Snatching Migrants With Open Court Cases; NY Officials, Lawyers Say It’s ‘Utterly Unlawful’*, NY Daily News (July 3, 2025, 6:50 AM), <https://www.nydailynews.com/2025/07/02/ice-agents-now-snatching-migrants-with-open-court-cases-nyc-officials-lawyers-say-its-utterly-unlawful/> (hereinafter “Seiwell re: ICE Snatching”); Shelby Bremer, *Lawsuit Over San Diego Immigration Court Arrest May Give Insight Into ICE Practices*, NBC San Diego (July 2, 2025, 6:01 PM), <https://www.nbcsandiego.com/news/local/san-diego-lawsuit-ice-courthouse-arrests/3861107/>; Melissa Gomez, *Faith Leaders Bear Witness as Migrants Make Their Case in Immigration Court*, Los Angeles Times (July 2, 2025, 3:00 AM), <https://www.latimes.com/california/story/2025-07-02/faith-leaders-bear-witness-as-migrants-make-their-case-immigration-court> (hereinafter, “Gomez re: Faith Leaders”); Madeleine May & Hannah Marr, *Afghan Ally Detained by ICE After Attending Immigration Court Hearing*, CBS News (July 1, 2025, 1:48 PM), <https://www.cbsnews.com/news/afghan-ally-detained-by-ice-immigration-court/>; Margaret Kadifa, *For One S.F. Asylum Seeker, ICE Arrest Meant Move to More Conservative Judge*, Mission Local (July 1, 2025, 4:00 AM), <https://missionlocal.org/2025/07/sf-asylum-seeker-immigration-judge-ice-arrest/> (hereinafter “Kadifa re: Forum Shopping”); Dean Moses, *ICE Raids Continue in Lower Manhattan Court as Immigrant Advocates Rail Against ‘Trump’s Personal Army’*, AMNY (July 1, 2025), <https://www.amny.com/news/ice-raids-lower-manhattan-court-trump-07012025/> (hereinafter, “Moses re: ICE Raids”); Natali Yahr, *Wisconsin Asylum Seeker Miguel Robles Detained in Unprecedented Wave of Courthouse Arrests*, Racine County Eye (July 1, 2025), <https://racinecountyeve.com/2025/06/30/miguel-robles-immigration-asylum/>; Gwynne Hogan, *He Fled Death Threats for Being Gay, Applied for Asylum and Married a U.S. Citizen. ICE Arrested Him Anyway*, The City (June 30, 2025, 1:41 PM), <https://www.thecity.nyc/2025/06/27/ice-arrested-asylum-gay/> (hereinafter “Hogan re: Mamadou Arrest”); Ko Lyn Cheang, *S.F. Drag Performer Detained by ICE After Asylum Hearing*, San Francisco Chronicle (June 28, 2025), <https://www.sfchronicle.com/sf/article/drag-performer-detained-ice-20399122.php>; Anna-Cat Brigida, *A Legal Trap? Why the Trump Administration is Targeting Immigration Courts for Arrests*, Al Jazeera (June 27, 2025), <https://www.aljazeera.com/news/longform/2025/6/27/why-the-trump-administration-is-targeting-immigration-courts-for-arrests>; Julia Marnin, *6-Year-Old Boy with Leukemia Arrested by ICE is Now Detained in Texas, Suit Says*, Fort Worth Star-Telegram (June 26, 2025, 3:23 PM), <https://www.star-telegram.com/news/state/texas/article309472695.html>; Dan Katz, *ICE Arrested a 6-Year-Old Boy with Leukemia at Immigration Court. His Family is Suing*, Texas Public Radio (June 25, 2025, 11:06 PM), <https://www.tpr.org/border-immigration/2025-06-25/ice-arrested-a-6-year-old-boy-with-leukemia-at-immigration-court-his-family-is-suing>; Junyao Yang, *Tracking Every ICE Action in San Francisco So Far*, Mission Local (June 25, 2025, 11:30 AM), <https://missionlocal.org/2025/06/sf-ice-arrests-tracker/>; Luis Ferré-Sadurní, *They Had Come to Graduate. Their Minds Were on a Student Held by ICE*, NY Times (June 25, 2025), <https://www.nytimes.com/2025/06/25/nyregion/immigrant-students-graduation-ice.html>; Nina Shapiro, *As Pushback Grows to WA Immigration Court Arrests, ICE Changes Tactics*, The Seattle Times (June 24, 2025, 6:00 AM), <https://www.seattletimes.com/seattle-news/as-pushback-grows-to-wa-immigration-court-arrests-ice-changes->

[tactics/](#) (hereinafter “Shapiro re: ICE Tactic Change”); Kate Morrissey, *Here’s What’s Happening to the People ICE Arrests in Immigration Court*, Capital & Main (June 24, 2025), <https://capitalandmain.com/heres-whats-happening-to-the-people-ice-arrests-in-immigration-court>; Elizabeth L.T. Moore & Elizabeth Zavala, *Obscure San Antonio Court Becomes Flashpoint in Immigration Debate*, San Antonio Express-News (June 23, 2025), <https://www.expressnews.com/news/article/obscure-san-antonio-immigration-court-spotlight-20381608.php>; Ray Sanchez & Allsha Ebrahimji, *Masked Ice Officers: The New Calling Card of The Trump Administration’s Crackdown*, CNN (June 21, 2025), <https://www.cnn.com/us/ice-immigration-officers-face-masks>; Ken Stone, *ICE Agents Scatter As SD Bishop Pham, Other Clergy Visit Immigration Court*, Times of San Diego (June 20, 2025, 3:04 PM), <https://timesofsandiego.com/life/2025/06/20/ice-agents-scatter-as-sd-bishop-pham-other-clergy-visit-immigration-court/>; Luis Ferré-Sadurní, *Brad Lander Tried to Escort Immigrants facing Arrest. He’s Not Alone*, NY Times (June 19, 2025), <https://www.nytimes.com/2025/06/19/nyregion/ice-immigrants-volunteer-escorts-courthouse.html> (hereinafter “Ferré-Sadurní re: Lander Escort”); Luis Ferré-Sadurní, *Brad Lander is Arrested by ICE Agents at Immigration Courthouse*, NY Times (June 17, 2025), <https://www.nytimes.com/2025/06/17/nyregion/brad-lander-immigration-ice.html> (hereinafter “Ferré-Sadurní re: Lander Arrest”); <https://www.krgv.com/news/ice-detains-three-people-outside-harlingen-immigration-court/>; Lily Celeste, *ICE Detains Three People Attending Their Immigration Hearings in Harlingen*, KRGV.Com (June 15, 2025, 6:40 PM), <https://www.krgv.com/news/ice-detains-three-people-outside-harlingen-immigration-court/>; Stephen Hobbs, *In Sacramento’s Immigration Court, ICE Detention Threats Leave Residents in Limbo*, The Sacramento Bee (June 14, 2025, 10:05 AM), <https://www.sacbee.com/news/politics-government/capitol-alert/article308346910.html> (hereinafter “Hobbs re: Sacramento Immigr. Ct. Arrests”); David Manoucheri, *ICE Agents Wait at Immigration Court in Sacramento for 2d Consecutive Day, Take Someone Into Custody*, KCRA3 (June 12, 2025, 2:53 PM), <https://www.kcra.com/article/ice-agents-immigration-court-sacramento-custody/65049263>; Ryan Oehrli, *‘Rigged’? ICE Agents Are Arresting People at Charlotte’s Immigration Court*, The Charlotte Observer (June 12, 2025, 11:31 AM), <https://www.charlotteobserver.com/news/local/crime/article308209165.html>; Thomas Lyons, *Mood is Tense at Concord Immigration Court Following ICE Arrests*, Berkleyside (June 12, 2025, 9:55 AM), <https://www.berkeleyside.org/2025/06/12/concord-immigration-court-tension-after-ice-arrests>; Ida Domingo, *ICE Arrests 10 at Sterling, Virginia Immigration Court During Enforcement Operation*, ABC 7 News (June 12, 2025, 6:13 AM), <https://wjla.com/news/local/ice-arrests-10-people-sterling-virginia-immigration-court-agents-detain-enforcement-deportation-salvadoran-venezuelan-peruvian-noncitizens-operation-fairfax-county-courtroom-photos-video-homeland-security-trump-administration-illegal>; Armando Garcia, *Immigrant Rights Group Say ICE Officers ‘Ambush Noncitizens’ in Courthouse Arrests, Ask Judge to Intervene*, ABC News (June 12, 2025, 10:32 AM), <https://abcnews.go.com/US/immigrant-rights-groups-ice-officers-ambush-noncitizens-courthouse/story?id=122770040>; Ximena Bustillo, *ICE’s Novel Strategy Allows for More Arrests from Inside Immigration Courts*, NPR (June 12, 2025, 5:02 AM), <https://www.npr.org/2025/06/12/nx-s1-5409403/trump-immigration-courts-arrests>; *ICE Arrests People at the Annandale Immigration Court*, Annandale Today (June 12, 2025), <https://annandaletoday.com/ice-arrests-people-at-the-annandale-immigration-court/>; Hanna Pampaloni, *ICE Makes Arrests at Sterling Immigration Court*, Loudoun Now (June 12, 2025), https://www.loudounnow.com/news/ice-makes-arrests-at-sterling-immigration-court/article_f8f7118c-aca1-4a8d-ad6e-99826fa77eb6.html; Luis Ferré-Sadurní, *Inside a Courthouse, Chaos and Tears as Trump Accelerates Deportations*, NY Times (June 12, 2025), <https://www.nytimes.com/2025/06/12/nyregion/immigration-courthouse-arrests-trump-deportation.html> (hereinafter “Ferré-Sadurní re: Inside NYC Immigr. Cts.”); Carolina Estrada, *Two Men Detained by ICE After Sacramento Immigration Court Hearings*, KCRA3 (June 11, 2025, 11:13 PM), <https://www.kcra.com/article/two-men-detained-by-ice-sacramento-immigration-hearings/65041264> (hereinafter, “Estrada re: Two Arrests”); Stephen Hobbs, *Two Men Handcuffed at Sacramento Immigration Court, Taken to ICE Office*, The Sacramento Bee (June 11, 2025, 6:09 PM), <https://www.sacbee.com/news/politics-government/capitol-alert/article308401280.html>; Martha Bellisile et al., *Immigration Officers Intensify Arrests in Courthouse Hallways on a Fast Track to Deportation*, Associated Press (June 11, 2025, 4:17 PM), <https://apnews.com/article/immigration-court-arrests-ice-deportation-99d822cdc93ae7dc26026c27895d5ea1> (hereinafter “Bellisile et al. re: Immigration Officers Intensify Arrests”); Brittany Taylor et al., *Second Day of Arrests by ICE Agents at Immigration Court in Southwest Houston*, Click 2 Houston.com

(June 11, 2025, 10:25 AM), <https://www.click2houston.com/news/local/2025/06/11/ice-agents-stationed-outside-immigration-court-in-houstons-greenspoint-area/>; Hamed Aleaziz, *Under Pressure From the White House, ICE Seeks New Ways to Ramp Up Arrests*, NY Times (June 11, 2025), <https://www.nytimes.com/2025/06/11/us/politics/ice-la-protest-arrests.html>; Priscilla Alvarez, *ICE Protest Nationwide Comes As Agency Scrambles to Meet Trump's Immigration Arrest Quotas*, CNN (June 10, 2025, 10:16 PM), <https://www.cnn.com/2025/06/10/politics/ice-scrambles-immigration-arrest-quotas>; Conrad Wilson, *ICE Arrests 2 More Asylum Seekers at Immigration Court in Portland*, OPB (June 10, 2025, 5:12 PM), <https://www.opb.org/article/2025/06/10/ice-arrests-2-more-asylum-seekers-at-immigration-court-in-portland/> (hereinafter, "Wilson re: Two Arrests"); Margaret Kadifa et al., *S.F. Immigration Court Shuts Down After ICE Protests, Arrests*, Mission Local (June 10, 2025, 12:43 PM), <https://missionlocal.org/2025/06/video-ice-agents-arrest-people-outside-s-f-courthouse/>; Ninfa Saavedra & Robert Arnold, *ICE Arrests Multiple People at Houston's Immigration Court*, Click2Houston.com (June 10, 2025, 2:48 PM), <https://www.click2houston.com/news/local/2025/06/10/ice-arrests-reportedly-underway-at-houstons-immigration-court/>; Natalie Weber, *ICE Detains Multiple Men at Houston Immigration Courthouse, Civil Rights Organization Says*, Houston Public Media (June 10, 2025, 11:58 AM), <https://www.houstonpublicmedia.org/articles/news/politics/immigration/2025/06/10/523600/ice-detains-multiple-men-at-houston-immigration-courthouse/>; Giulia McDonnell Nieto del Rio, *This Is What An ICE Arrest in Boston Immigration Court Looks Like*, Boston Globe (June 9, 2025, 6:31 AM), <https://www.bostonglobe.com/2025/06/09/metro/ice-arrests-at-boston-immigration-court/> (hereinafter, "Nieto del Rio re: Inside Boston Immigr. Ct. Arrest"); Audrey Conklin & Bill Melugin, *Trump's ICE Launches Bold Courthouse Migrant Arrest Strategy to Fast-Track Deportations Biden Avoided*, Fox News (June 9, 2025, 4:00 AM), <https://www.foxnews.com/us/trumps-ice-launches-bold-courthouse-migrant-arrest-strategy-fast-track-deportations-biden-avoided?msocid=1cd283b1756f61231883976574c46057>; Conrad Wilson, *ICE Detains Another Asylum-Seeker Outside Portland Courtroom, Legal Petition Says*, OPB (June 6, 2025, 9:30 AM), <https://www.opb.org/article/2025/06/06/asylum-arrest-portland-yzlh/> (hereinafter "Wilson re: Arrest"); Michael Elsen-Rooney, *Their Student Was Detained by ICE. Now this Bronx School is Rallying to Get Him Back*, Chalkbeat New York (June 5, 2025, 7:33pm), <https://www.chalkbeat.org/newyork/2025/06/05/nyc-student-detained-by-ice-supported-by-ellis-prep-bronx-school-community/>; Bennett Haerberle, *In Chicago & Elsewhere, ICE Increases Enforcement in Immigration Court*, 5 Chicago (June 5, 2025, 5:54 PM), <https://www.nbcchicago.com/investigations/in-chicago-and-elsewhere-ice-increases-enforcement-in-immigration-court/3761730/>; Megan Ulu-Lani Boyanton, *At Least Eight People Detained at Denver Immigration Court as ICE Presence Increases, Advocates Say*, The Denver Post (June 5, 2025, 5:04 PM), <https://www.denverpost.com/2025/06/05/denver-immigration-court-arrests-ice-trump-advocates/>; Amy Larson, *Newlywed Couple Separated at Immigration Courthouse by ICE*, The Hill (June 5, 2025, 1:14 PM), <https://thehill.com/homenews/state-watch/5334753-immigration-courthouse-ice-trump-dhs/>; Laura Romero et al., *In a New Tactic, ICE Is Arresting Migrants at Immigration Courts, Attorneys Say*, ABC News (June 4, 2025, 6:37 PM), <https://abcnews.go.com/US/new-tactic-ice-arresting-migrants-immigration-courts-attorneys/story?id=122513021>; Julie Carey, *Cancel, Arrest, Deport: Immigration Lawyer Warns of Emerging ICE Tactic*, NBC Washington (June 4, 2025, 3:01 PM), <https://www.nbcwashington.com/news/local/cancel-arrest-deport-immigration-lawyer-warns-of-emerging-ice-tactic/3927509/>; Brad Schmidt, *Immigration Arrest at Courthouse Marks First for Portland*, The Oregonian (June 3, 2025, 3:22 PM), <https://www.oregonlive.com/politics/2025/06/immigration-arrest-at-courthouse-marks-first-for-portland.html>; Stephen Franklin & Katema Hosseini, *ICE Target Noncitizens As Cases Dismissed in Immigration Court in Chicago*, Borderless (June 3, 2025), <https://borderlessmag.org/2025/06/03/ice-arrests-chicago-immigration-court-trump-detention-immigration-custom-enforcement/>; Conrad Wilson, *ICE Detains Asylum Seeker Outside Portland Immigration Court, Lawyers Say*, OPB (June 2, 2025, 11:01 PM), <https://www.opb.org/article/2025/06/02/ice-immigration-enforcement-detains-asylum-seeker-portland-court/> (hereinafter, "Wilson re: Initial Arrest"); Angélica Franganillo Díaz & Priscilla Alvarez, *ICE Targets Migrants for Arrest at Courthouses as Trump Administration Intensifies Deportation Push*, CNN (June 2, 2025, 5:00 AM), <https://www.cnn.com/2025/06/02/politics/ice-arrests-migrants-courthouse/>; Shelly Bradbury, *Feds Detain Immigrant Family at Denver Courthouse Amid New Trump Strategy*, Denver Post (May 30, 2025, 3:32 PM),

<https://www.denverpost.com/2025/05/30/denver-immigration-arrest-courthouse-ice-trump/>; Giulia McDonnell Nieto del Rio, *ICE Arrests at Massachusetts Immigration Courts Target Immigrants Seeking Permission to Stay in US*, Boston Globe (May 30, 2025, 1:39PM), <https://www.bostonglobe.com/2025/05/27/metro/immigration-courts-ice-arrests-massachusetts> (hereinafter, “Nieto del Rio re: Boston Immigr. Ct. Arrests”); Suzanne Gamboa, *Immigration Arrests in Courthouses Have Become the New Deportation Tool, Stripping Migrants of a Legal Process*, NBC News (May 30, 2025, 5:00 AM), <https://www.nbcnews.com/news/latino/immigrations-arrests-ice-deportations-courthouse-legal-process-ice-rcna209671>; Hamed Aleaziz et al., *How ICE is Seeking to Ramp Up Deportations Through Courthouse Arrests*, NY Times (May 30, 2025), <https://www.nytimes.com/2025/05/30/us/politics/ice-courthouse-arrests.html>; Carolina Estrada, *‘This is Very Concerning’: 3 Arrested While Attending Hearings at Immigration Court in Sacramento, Groups Say*, KCRA3 (May 29, 2025, 1:37 PM), <https://www.kcra.com/article/sacramento-immigration-court-arrests-ice/64920625>; Allison Sherry, *Signaling a Policy Shift, ICE Detains a Family Who Showed Up at Denver Immigration Court for a Check-In*, CPR News (May 29, 2025, 1:35 PM), <https://www.cpr.org/2025/05/29/ice-detains-family-denver-immigration-court/>; Daniel Gonzalez & Richard Ruelas, *After Short Break, ICE Resumes Arrests at Phoenix Immigration Court, Changes Keep Tactic*, AZ Central (May 29, 2025, 5:01 AM), <https://www.azcentral.com/story/news/politics/immigration/2025/05/29/phoenix-immigration-court-ice-arrests-resume/83767918007/>; Gwynne Hogan, *Migrants, Protestors, and a Pastor Arrested Inside and Outside Manhattan Immigration Courthouses*, The City (May 28, 2025, 3:16 PM), <https://www.thecity.nyc/2025/05/28/ice-arrests-migrants-26-federal-plaza-pastor/>; (hereinafter, “Hogan re: NYC Immigr. Ct. Arrests”); Olivia Hebert, *ICE Stormed SF Court to Arrest 4 Asylum Seekers, Denounced as Unlawful*, SF Gate (May 28, 2025), <https://www.sfgate.com/bayarea/article/asylum-seekers-arrested-ice-san-francisco-20349387.php>; Tomoki Chien, *Undercover ICE Agents Begin Making Arrests at SF Immigration Court*, The San Francisco Standard (May 27, 2025, 5:32 PM), <https://sfstandard.com/2025/05/27/undercover-ice-agents-make-arrests-san-francisco-court/>; Luis Ferré-Sadurní & Dana Rubinstein, *ICE, Shifting Tactics, Detains High School Student at N.Y.C. Courthouse*, NY Times (May 27, 2025), <https://www.nytimes.com/2025/05/27/nyregion/new-york-student-arrested-ice.html>; Michael Elsen-Rooney, *A Bronx High Schooler Showed Up for a Routine Immigration Court Date. ICE Was Waiting*, Chalkbeat New York (May 26, 2025, 8:35 pm), <https://www.chalkbeat.org/newyork/2025/05/27/bronx-high-school-student-detained-by-immigration-ice-agents/?ref=hellgatenyc.com>; Milena Malaver et al., *ICE Agents in Miami Find New Spot to Carry Out Arrests: Immigration Court*, Miami Herald (May 26, 2025, 1:27 PM), <https://www.miamiherald.com/news/local/immigration/article306900486.html>; Melissa Gomez, *Father Ripped from Family as Agents Target Immigration Courts, Arresting People After Cases Dismissed*, LA Times (May 24, 2025, 10:00AM), <https://www.latimes.com/california/story/2025-05-24/ice-agents-swarm-immigration-courts-arresting-people-after-cases-dismissed> (hereinafter, “Gomez re: Immigr. Ct. Arrests”); Tyche Hendricks, *‘Unprecedented’: ICE Officers Operating Inside Bay Area Immigration Courts, Lawyers Say*, KQED (May 24, 2025), <https://www.kqed.org/news/12041473/unprecedented-ice-officers-operating-inside-bay-area-immigration-courts-lawyers-say>; Ted Hesson & Kristina Cooke, *ICE Arrests Migrants at Courthouses, Opens Door to Fast-Track Deportations*, Reuters (May 23, 2025, 4:35PM), <https://www.reuters.com/world/us/ice-arrests-migrants-courthouses-opens-door-fast-track-deportations-2025-05-23/>; Camilo Montoya-Galvez & Nidia Cavazos, *ICE Ending Migrants’ Court Cases In Order to Arrest and Move to Deport Them*, CBS News (May 23, 2025, 9:53 AM), <https://www.cbsnews.com/news/ice-ending-migrants-court-cases-arrest-move-to-deport-them/>; Arelis R. Hernández & Maria Sacchetti, *Immigrant Arrests at Courthouses Signal New Tactic in Trump’s Deportation Push*, Washington Post (May 23, 2025), <https://www.washingtonpost.com/immigration/2025/05/23/immigration-court-arrests-ice-trump/>; Gustavo Solis, *ICE Agents Swarm San Diego Immigration Court, Arresting People After Their Hearings*, KPBS (May 22, 2025, 5:45PM), <https://www.kpbs.org/news/border-immigration/2025/05/22/ice-agents-swarm-san-diego-immigration-court-arresting-people-after-their-hearings>; Trevor Hughes, *ICE Agents Deploy New Tactic: Arresting People As They Leave Mandatory Court Hearings*, USA Today (May 22, 2025, 1:13 PM), <https://www.usatoday.com/story/news/nation/2025/05/22/ice-arrests-immigration-court-deportation-tactics/83792357007/>; Joshua Goodman et al., *They Came to Hearing at Chicago’s Immigration Court, Then Got Arrested*, Chicago Sun-Times (May 22, 2025, 3:59PM), <https://chicago.suntimes.com/immigration/2025/05/22/ice-agents-hallways-immigration-court-trump-mass-arrest>; Anders Hagstrom & Bill Melugin, *ICE Beings New, Nationwide*

Much of the coverage express doubts about the integrity of ICE arrests at immigration courts, describing them as a due process violation and/or a tactic to increase deportations, forum shop, and scare noncitizens into giving up on their immigration cases.⁵ Some coverage alludes to possible coordination between EOIR and ICE in making these arrests.⁶ Several editorials also decry the arrests as a “set up” and for disregarding due process.⁷

Effort to Arrest Illegal Aliens at Immigration Hearings (May 22, 2025, 1:07 PM), <https://www.foxnews.com/politics/ice-begins-new-nationwide-effort-arrest-illegal-aliens-immigration-hearings>; Joshua Goodman & Gisela Salomon, *ICE Agents Wait in Hallways of Immigration Court as Trump Seeks to Deliver on Mass Arrest Pledge*, Associated Press (May 22, 2025, 1:30 AM), <https://apnews.com/article/immigration-courts-arrests-trump-ice-deportations-fa96435d4ec021cc8ff636b23d80d848>; J. Dale Shoemaker, *ICE Raids Immigration Court in Buffalo*, Investigative Post (May 22, 2025), <https://www.investigativepost.org/2025/05/22/ice-raids-immigration-court-in-buffalo/>; Raphael Romero Ruiz *et al.*, *For 2nd Day, People Attending Phoenix Immigration Hearings Arrested by ICE*, USA Today (May 21, 2025, 11:42 PM), <https://www.usatoday.com/story/news/politics/immigration/2025/05/21/ice-arrests-phoenix-immigration-court/83772323007/?gnt-cfr=1&gca-cat=p>; Gustavo Sagrero Álvarez, *ICE Agents at Seattle Courthouse Arrest People Whose Deportation Hearings are Dismissed*, KUOW (May 21, 5:45 PM), <https://www.kuow.org/stories/ice-agents-at-seattle-courthouse-arrest-people-whose-deportation-hearings-are-dismissed>; Akela Lacy *et al.* *ICE Agents Are Camped Outside Immigration Courts to Make Arrests*, The Intercept (May 21, 2025, 3:27 PM), <https://theintercept.com/2025/05/21/ice-agents-courts-arrests-immigrants-deport/>; Paul Ingram, *‘Mayhem’ As ICE Officials Arrest Multiple People at Immigration Court in Phoenix*, AZ Mirror (May 21, 2025, 11:12 AM), <https://azmirror.com/2025/05/21/mayhem-as-ice-officials-arrest-multiple-people-at-immigration-court-in-phoenix/>; Nina Shapiro, *ICE Arrests at WA Immigration Court Spark Fear of Fast-Track Removal*, Seattle Times (May 21, 2025, 6:00 AM), <https://www.seattletimes.com/seattle-news/law-justice/ice-arrests-at-wa-immigration-court-spark-fear-of-fast-track-removal/> (hereinafter, “Shapiro re: ICE Arrests”); Raphael Romero Ruiz & Richard Ruelas, *They Showed Up to Immigration Court in Phoenix. Then Agents Surrounded Them*, USA Today (May 20, 2025), <https://www.usatoday.com/story/news/politics/immigration/2025/05/20/prosecutors-drop-charges-vs-migrants-as-border-agents-wait-outside/83756994007/?gnt-cfr=1&gca-cat=p>

⁵ Kadifa re: Adult Arrests, *supra* n. 4; Salama, *supra* n. 4; Markey, *supra* n. 4; Mose re: ICE in Court; James, *supra* n. 4; Bellisile *et al.* re: Volunteers Flock to Immigration Courts, *supra* n. 4; Bellisile, *supra* n. 4; Cole *et al.*, *supra* n. 4; Ferré-Sadurní re: Lawsuit, *supra* n. 4; Rivera *et al.*, *supra* n. 4; Cuevas, *supra* n. 4; Abbot, *supra* n. 4; Bernstein, *supra* n. 4; Thamer, *supra* n. 4; Browning & O’Brien, *supra* n. 4; Economist, *supra* n. 4; Ramos, *supra* n. 4; Li & Cheang, *supra* n. 4; Tavernise, *supra* n. 4; Khan, *supra* n. 4; DeAngelis, *supra* n. 4; Seiwel re: ICE Opposition Grows, *supra* n. 4; Singhai re: Volunteers, *supra* n. 4; Kadifa re: Forum Shopping, *supra* n. 4; Moses re: ICE Raids, *supra* n. 4; Yahr, *supra* n. 4; Hogan re: Mamadou Arrest, *supra* n. 4; Cheang, *supra* n. 4; Brigida, *supra* n. 4; Katz, *supra* n. 4; Morrissey, *supra* n. 4; Moore & Zavala, *supra* n. 4; Hobbs re: Sacramento Immigr. Ct. Arrests, *supra* n. 4; Lyons, *supra* n. 4; Oehrli, *supra* n. 4; Bustillo, *supra* n. 4; Bellisile *et al.* re: Immigration Officers Intensify Arrests, *supra* n. 4; Wilson re: Two Arrests, *supra* n. 4; Kadifa *et al.*, *supra* n. 4; Nieto del Rio re: Inside Boston Immigr. Ct. Arrest, *supra* n. 4; Conklin & Melugin, *supra* n. 4; Wilson re: Arrest, *supra* n.14; Romero *et al.*, *supra* n.14; Carey, *supra* n. 4; Franklin & Hosseini, *supra* n. 4; Bradbury, *supra* n. 4; Nieto del Rio re: Boston Immigr. Ct. Arrests, *supra* n. 4; Gamboa, *supra* n. 4; Aleaziz *et al.*, *supra* n. 4; Gonzalez & Ruelas, *supra* n. 4; Hebert, *supra* n. 4; Chien, *supra* n. 4; Elsen-Rooney re: Dylan Arrest, *supra* n. 4; Malaver *et al.*, *supra* n. 4; Gomez re: Immigr. Ct. Arrests, *supra* n. 4; Hernández & Sacchetti, *supra* n. 4; Solis, *supra* n. 4; Hughes, *supra* n. 4; Goodman *et al.*, *supra* n. 4; Goodman & Salomon, *supra* n. 4; Shoemaker, *supra* n. 4; Ruiz *et al.*, *supra* n. 4; Álvarez, *supra* n. 4; Lacy *et al.*, *supra* n. 4; Ingram, *supra* n. 4; Shapiro re: ICE Arrests, *supra* n. 4; Seiwel re: ICE Snatching, *supra* n. 4; Hendricks, *supra* n. 4; Schmidt, *supra* n. 4.

⁶ Ferré-Sadurní re: Lawsuit, *supra* n. 4; Bernstein, *supra* n. 4; Khan, *supra* n. 4; Yahr, *supra* n. 4; Aleaziz, *supra* n. 4; Conklin & Melugin, *supra* n. 4; Aleaziz *et al.*, *supra* n. 4; Gomez re: Immigr. Ct. Arrests, *supra* n. 4; Díaz & Alvarez, *supra* n. 4.

⁷ Veronica Cardenas, *I Was Once an ICE Prosecutor. What I See Now in Immigration Courts Is Disturbing*, The Hill (July 17, 2025, 8:00AM), <https://thehill.com/opinion/immigration/5404863-i-was-once-an-ice-prosecutor-what-i-see-now>

Similarly, eighty-five articles in state, local, and nationwide media outlets have discussed ICE asking immigration judges to dismiss noncitizens' immigration cases so it can pursue these noncitizens' expedited removal.⁸ Immigration attorneys also report ICE officials serving pre-signed dismissals based on "non-opposition" to noncitizen respondents at immigration courts without respondents not having notice of ICE's motion to dismiss their immigration case and an opportunity to oppose it. Much of the coverage on these dismissals casts doubt on their integrity, describing them as a violation of due process and a tactic to deport noncitizens without hearings.⁹ Several articles also express concerns about possible coordination between EOIR and

[in-immigration-courts-is-disturbing/](#); Brian Strassburger, S.J. & William Critchley-Menor, S.J., *What We Saw During An ICE Arrest & Immigration Court Hearing: The Breakdown of Justice in America*, America: The Jesuit Review (July 11, 2025), <https://www.americamagazine.org/politics-society/2025/07/11/ice-immigration-court-deportation-injustice-251119>; *Trump Disregards Due Process in Our Nation's Immigration Courts*, San Antonio Express-News (June 27, 2025), <https://www.expressnews.com/opinion/editorial/article/ice-arrest-immigration-court-texas-20395342.php>; *Masked ICE Arrests Raise Urgent Questions About U.S. Immigration Practices*, The Riverdale Press (June 26, 2025), <https://www.riverdalepress.com/stories/masked-ice-arrests-raise-urgent-questions-about-us-immigration-practices.187060>.

⁸ Kadifa re: Adult Arrests, *supra* n. 4; Camacho, *supra* n. 4; Salama, *supra* n. 4; Maurice DuBois et al., *3 Immigration Judges Speak Out About Their Firings: "It Was Arbitrary, Unfair"*, CBS News (July 24, 2025, 8:34 PM), <https://www.cbsnews.com/boston/news/immigration-judges-speak-out-firings-arbitrary-unfair/?intcid=CNM-00-10abd1h>; James, *supra* n. 4; Kadifa re: ICE Snatching, *supra* n. 4; Bellisile et al. re: Volunteers Flock to Immigration Courts, *supra* n. 4; Rivera et al., *supra* n. 4; Cuevas, *supra* n. 4; Bellisile, *supra* n. 4; Singhai re: Week at San Diego Immigration Court, *supra* n. 4; Cole et al., *supra* n. 4; Ferré-Sadurní re: Lawsuit, *supra* n. 4; Bernstein, *supra* n. 4; Thamer, *supra* n. 4; Browning & O'Brien, *supra* n. 4; Kadifa re: 4 Arrests, *supra* n. 4; Economist, *supra* n. 4; Regalado & Karlamangla, *supra* n. 4; Li & Cheang, *supra* n. 4; Khan, *supra* n. 4; Seiwel re: ICE Opposition Grows, *supra* n. 4; Vertuno, *supra* n. 4; Seiwel re: ICE Snatching, *supra* n. 4; Gomez re: Faith Leaders, *supra* n. 4; Bremer, *supra* n. 4; May & Marr, *supra* n. 4; Kadifa re: Forum Shopping, *supra* n. 4; Yahr, *supra* n. 4; Hogan re: Mamadou Arrest, *supra* n. 4; Cheang, *supra* n. 4; Brigida, *supra* n. 4; Marnin, *supra* n. 4; Katz, *supra* n. 4; Shapiro re: ICE Tactic Change, *supra* n. 4; Morrissey, *supra* n. 4; Moore & Zavala, *supra* n. 4; Ferré-Sadurní re: Lander Escort, *supra* n. 4; Celeste, *supra* n. 4; Oehrli, *supra* n. 4; Garcia, *supra* n. 4; Lyons, *supra* n. 4; Bustillo, *supra* n. 4; Ferré-Sadurní re: Inside NYC Immigr. Cts., *supra* n. 4; Bellisile et al. re: Immigration Officers Intensify Arrests, *supra* n. 4; Taylor et al., *supra* n. 4; Julia Ainsely, *Trump Admin Tells Immigration Judges to Dismiss Cases in Tactic to Speed Up Arrests*, NBC News (June 11, 2025, 5:00AM), <https://www.nbcnews.com/politics/national-security/trump-admin-tells-immigration-judges-dismiss-cases-tactic-speed-arrest-rcna212138>; Wilson re: Two Arrests, *supra* n. 4; Saavedra & Arnold, *supra* n. 4; Weber, *supra* n. 4; Nieto del Rio re: Inside Boston Immigr. Ct. Arrest, *supra* n. 4; Conklin & Melugin, *supra* n. 4; Wilson re: Arrest, *supra* n. 4; Larson, *supra* n. 4; Romero et al., *supra* n. 4; Carey, *supra* n. 4; Schmidt, *supra* n. 4; Franklin & Hosseini, *supra* n. 4; Wilson re: Initial Arrest, *supra* n. 4; Díaz & Alvarez, *supra* n. 4; Bradbury, *supra* n. 4; Nieto del Rio re: Boston Immigr. Ct. Arrests, *supra* n. 4; Gamboa, *supra* n. 4; Aleaziz et al., *supra* n. 4; Sherry, *supra* n. 4; Gonzalez & Ruelas, *supra* n. 4; Noriega, *supra* n. 4; Hogan re: NYC Immigr. Ct. Arrests, *supra* n. 4; Chien, *supra* n. 4; Elsen-Rooney re: Dylan Arrest, *supra* n. 4; Malaver et al., *supra* n. 4; Gomez re: Immigr. Ct. Arrests, *supra* n. 4; Hendriks, *supra* n. 4; Montoya-Galvez & Cavazos, *supra* n. 4; Hernández & Sacchetti, *supra* n. 4; Hughes, *supra* n. 4; Goodman et al., *supra* n. 4; Hagstrom & Melugin, *supra* n. 4; Goodman & Salomon, *supra* n. 4; Shoemaker, *supra* n. 4; Ruiz et al., *supra* n. 4; Álvarez, *supra* n. 4; Lacy et al., *supra* n. 4; Ingram, *supra* n. 4; Shapiro re: ICE Arrests, *supra* n. 4.

⁹ James, *supra* n. 4; Cole et al., *supra* n. 4; Ferré-Sadurní re: Lawsuit, *supra* n. 4; Cuevas, *supra* n. 4; Bernstein, *supra* n. 4; Browning & O'Brien, *supra* n. 4; Kadifa re: 4 Arrests, *supra* n. 4; Li & Cheang, *supra* n. 4; Khan, *supra* n. 4; Kadifa re: Forum Shopping, *supra* n. 4; Yahr, *supra* n. 4; Hogan re: Mamadou Arrest, *supra* n.2; Cheang, *supra* n. 4; Brigida, *supra* n. 4; Moore & Zavala, *supra* n. 4; Lyons, *supra* n. 4; Oehrli, *supra* n. 4; Garcia, *supra* n. 4; Bustillo, *supra* n. 4; Ferré-

ICE in dismissals.¹⁰ And some coverage even suggests that EOIR is firing immigration judges for refusing to dismiss cases.¹¹

Arrests and dismissals at immigration courts have outraged Americans around the country. Opposition to these actions and doubts about their legality have prompted mass protests at immigration courts in New York, Seattle, San Francisco, and elsewhere.¹² It has also prompted clergy, political leaders, and other members of the public to accompany noncitizens to their immigration court dates to document arrests and dismissals, attempt to stop the former,

Sadurní re: Inside NYC Immigr. Cts., *supra* n. 4; Bellisile et al. re: Immigration Officers Intensify Arrests, *supra* n. 4; Wilson re: Two Arrests, *supra* n. 4; Saavedra & Arnold, *supra* n. 4; Nieto del Rio re: Inside Boston Immigr. Ct. Arrest, *supra* n. 4; Conklin & Melugin, *supra* n. 4; Wilson re: Arrest, *supra* n. 4; Romero et al., *supra* n. 4; Carey, *supra* n. 4; Franklin & Hosseini, *supra* n. 4; Bradbury, *supra* n. 4; Nieto del Rio re: Boston Immigr. Ct. Arrests, *supra* n. 4; Gamboa, *supra* n. 4; Aleaziz et al., *supra* n. 4; Chien, *supra* n. 4; Elsen-Rooney re: Dylan Arrest, *supra* n. 4; Malaver et al., *supra* n. 4; Gomez re: Immigr. Ct. Arrests, *supra* n. 4; Hernández & Sacchetti, *supra* n. 4; Hughes, *supra* n. 4; Ruiz et al, *supra* n. 4; Lacy et al., *supra* n. 4; Shapiro re: ICE Arrests, *supra* n. 4; Seiwel re: ICE Snatching, *supra* n. 4; Hendricks, *supra* n. 4; Seiwel re: ICE Opposition Grows, *supra* n. 4.

¹⁰ Ferré-Sadurní re: Lawsuit, *supra* n. 4; Bernstein, *supra* n. 4; Khan, *supra* n. 4; Yahr, *supra* n. 4; Conklin & Melugin, *supra* n. 4; Aleaziz et al., *supra* n. 4; Díaz & Alvarez, *supra* n. 4; Schmidt, *supra* n. 4.

¹¹ Dubois et al., *supra* n. 8.

¹² Thamer, *supra* n. 4; Browning & O'Brien, *supra* n. 4; Alicia Victoria Lozano, *Violent Clashes at San Francisco Immigration Court Won't Deter Protestors, Organizers Say*, NBC News (July 10, 2025, 4:43 PM), <https://www.nbcnews.com/news/us-news/violent-clashes-san-francisco-immigration-court-wont-deter-protesters-rcna218059>; Sarah Rumpf-Whitten, *Watch: ICE Agents Fight Off Masked Mob Outside Blue City Immigration Court*, FOX News (July 10, 2025, 1:12 PM), <https://www.foxnews.com/us/watch-ice-agents-fight-off-masked-mob-outside-blue-city-immigration-court>; Shay Arthur, *Crowd Gathers for Immigration Rally at Memphis Court*, WREG Memphis (July 8, 2025, 12:07 PM), <https://wreg.com/news/local/crowd-gathers-for-immigration-rally-at-memphis-court/>; Ramos, *supra* n. 4; Regalado & Karlamangla, *supra* n. 4; Li & Cheang, *supra* n. 4; Khan, *supra* n. 4; DeAngelis, *supra* n. 4; Stephania Jimenez, *PSL San Antonio Organizes Event to Educate Community on Immigration Laws Amid Rising ICE Deportations*, KSAT (July 1, 2025, 10:42 PM), <https://www.ksat.com/news/local/2025/07/02/psl-san-antonio-organizes-event-to-educate-community-on-immigration-laws-amid-rising-ice-deportations/>; May & Marr, *supra* n. 4; Shapiro re: ICE Tactic Change, *supra* n. 4; Ferré-Sadurní re: Lander Arrest, *supra* n. 4; Moore & Zavala, *supra* n. 4; Greg Micek et al., *Sacramento Immigration Court on Lockdown, Draws Protest After Suspected ICE Operation*, Capradio (June 12, 2025), <https://www.capradio.org/articles/2025/06/12/sacramento-immigration-court-on-lockdown-draws-protest-after-suspected-ice-operation/>; Hobbs re: Sacramento Immigr. Ct. Arrests, *supra* n. 4; Lyons, *supra* n. 4; Ferré-Sadurní re: Inside NYC Immigr. Cts., *supra* n. 4; Bellisile et al. re: Immigration Officers Intensify Arrests, *supra* n. 4; Alvarez, *supra* n. 4; George Kelly & Max Harrison-Caldwell, *Protesters Shut Down Immigration Court After ICE Arrests*, The San Francisco Standard (June 10, 2025, 1:00 PM), <https://sfstandard.com/2025/06/10/protesters-surround-immigration-court-after-ice-arrests/>; Kadifa et al., *supra* n. 4; Weber, *supra* n. 4; Joe Rivano Barros et al., *S.F. Police Arrest Dozens in 2nd Night of Protests Against ICE*, Mission Local (June 9, 2025, 8:16 PM), <https://missionlocal.org/2025/06/sf-mission-march-mobilized-thousands-against-ice/>; Boyanton, *supra* n. 4; Aleaziz et al., *supra* n. 4; Hogan re: NYC Immigr. Ct. Arrests; Ruiz et al, *supra* n. 4.

help arrested noncitizens inform their families.¹³ At least four federal judges have also deemed a few specific arrests at immigration courts unlawful and ordered ICE to release the arrestees,¹⁴ while a class of noncitizens represented by several rights groups has also sued to stop the arrests nationwide.¹⁵

Responsive records will address critical integrity questions left open by existing media coverage. Such records will show the extent that EOIR leadership and support staff have coordinated with ICE OPLA leadership to facilitate arrests, dismissals, and enforcement actions in immigration courts.

B. URGENCY TO INFORM THE PUBLIC ABOUT FEDERAL GOVERNMENT ACTIVITY BY A REQUESTER

Additionally, and alternatively, the Council has a compelling need for the records sought. It is primarily engaged in disseminating information. And urgency also exists to inform the public about the topics discussed above.

1. *The Council Primarily Engages in Information Dissemination*

The Council primarily engages in disseminating information and analysis on immigration and other issues. Organizations primarily engaged in information dissemination include not only “media organizations and newspapers,” *Heritage Found. v. Entl. Prot. Agency*, Civil Action No. 23-748, 2023 WL 2954418, *3 (D.D.C. 2023), but also “non-partisan law and public policy group[s]” like Requesters that “regularly write[], publish[], and disseminat[e], information online,” *Brennan Ctr. for Just.*, 498 F. Supp. 3d at 98 (Brennan Center); see also *Ctr. for Pub. Integrity v. U.S. Dep’t of Def.*, 411 F. Supp. 3d 5 (D.D.C. 2019) (Center for Public Integrity); *Protect Dem. Proj. v. U.S. Dep’t of Def.*, 263 F. Supp. 3d 293, 298 (D.D.C. 2017) (Protect Democracy Project); *Am. Civil Liberties Union*, 321 F. Supp. 2d at 29 n.5 (Electronic Privacy Information Center (“EPIC”)).

Like Brennan Center, Protect Democracy Project, EPIC, and Center for Public Integrity, the Council authors factsheets and special reports on proposed and actual immigration policies,

¹³ Salama, *supra* n. 4; Markey, *supra* n. 4; Mose re: ICE in Court; Bellisile et al. re: Volunteers Flock to Immigration Courts, *supra* n. 4; Ferré-Sadurní re: Lawsuit, *supra* n. 4; Belz, *supra* n. 4; Thamer, *supra* n. 4; Strassburger & Critchley-Menor, *supra* n. 5; Ciara Encinas, *Volunteers Describe How They Document ICE Arrests in Immigration Courts*, Fox 5 (July 11, 2025, 4 :55 PM), <https://fox5sandiego.com/news/local-news/san-diego/san-diego-court-ice-arrests/>; Zavala, *supra* n. 4; Joey Safchik, *ICE Handcuffs 71-Year-Old Grandmother, a US Citizen, at San Diego Immigration Court*, 7 San Diego (July 9, 2025, 7 :06 PM), <https://www.nbcsandiego.com/news/local/ice-arrests-71-year-old-grandmother-a-us-citizen-at-san-diego-immigration-court/3865098/>; Ramos, *supra* n. 4; Rossoto, *supra* n. 4; Khan, *supra* n. 4; Singhai re: Volunteers, *supra* n. 4; Gomez re : Faith Leaders, *supra* n. 4; Shapiro re: ICE Tactic Change, *supra* n. 4; Sanchez & Ebrahimji, *supra* n. 4; Ferré-Sadurní re: Lander Arrest, *supra* n. 4; Ferré-Sadurní re: Lander Escort, *supra* n. 4; Micek et al., *supra* n. 4; Stone, *supra* n. 4; Hobbs re: Sacramento Immigr. Ct. Arrests, *supra* n. 4; Estrada re: Two Arrests, *supra* n. 4; Boyanton, *supra* n. 4.

¹⁴ See Markey, *supra* n. 4; Bernstein, *supra* n. 4; Baumhardt, *supra* n. 4; Ramos, *supra* n. 4; Vertuno, *supra* n. 4.

¹⁵ See, e.g., Rivera et al., *supra* n. 4; Abbot, *supra* n. 4; Bellisile, *supra* n. 4; Cole et al., *supra* n. 4; Ferré-Sadurní re: Lawsuit, *supra* n. 4.

some of which shape media coverage in outlets across the nation.¹⁶ It also analyzes immigration data and other government records—including those obtained through FOIA requests like this one—in interactive web reports.¹⁷ And it circulates its reports and factsheets through its website,¹⁸ blog, email newsletters, and an X (formerly known as Twitter) account with 64.9 thousand followers.¹⁹

2. Urgency Exists to Inform the Public

Urgency also exists to inform the public about the extent that EOIR leadership and support staff have coordinated with ICE OPLA leadership to facilitate arrests, dismissals, and enforcement actions in immigration courts.

Requisite urgency exists where “the request touches on ‘a matter of current exigency to the American public’” and delay “compromises a significant recognized interest.” *Protect Dem. Proj.*, 263 F. Supp. 3d 293 at 299 (quoting *Al-Fayed v. CIA*, 254 F.3d 300, 310 (D.C. Cir. 2001)). The above topics are exigent to the American public, as demonstrated by the one hundred and twenty plus articles discussing ICE arrests at or near immigration courts cited in this request, the eighty plus articles discussing dismissals of immigration proceedings, and the mass protests against these actions outside immigration courts. See *CREW*, 2025 WL 752367, at *13 (finding urgency to inform the public based on at least fifty articles on the issue); *Am. Civil Liberties Union of No. Cal. v. U.S. Dep’t of Def.*, No. C 06-01698, 2006 WL 1469418, at *6 (N.D. Cal. May 25, 2006) (same); 28 C.F.R. § 16.5(e)(3) (“The existence of numerous articles published on a given subject can be helpful to establishing the requirement that there be an ‘urgency to inform’ the public on the topic.”).

Delayed production of responsive records would compromise the ongoing public debate about the propriety of ICE arrests at immigration courts and the dismissal of immigration cases,

¹⁶ See, e.g., *Trump-Backed Mass Deportations Would Cost Billions*, Report Says, CBS News (Oct. 3, 2024), <https://www.cbsnews.com/video/trump-backed-mass-deportations-would-cost-billions-report/> (discussing Am. Immigr. Council, *Mass Deportation: Devastating Costs to America, Its Budget and Economy* (Oct. 2, 2024), <https://www.americanimmigrationcouncil.org/report/mass-deportation/>); Emma Goldberg, *What if Trump Deported Millions of Immigrants*, The New York Times (Oct. 22, 2024), https://www.nytimes.com/interactive/2024/10/22/us/elections/trump-deportation.html?unlocked_article_code=1.Uk4.Pjao.990iYFTTpEl6 (same); *What Trump’s Mass Deportation Plan Might Look Like If He Wins the Election*, 60 Minutes (Oct. 27, 2024), <https://www.youtube.com/watch?v=WjCHjwLSMFI> (same); *Mass Deportations*, Last Week Tonight (Oct. 27, 2024), <https://www.youtube.com/watch?v=0UEhMDAIX1Y> (same); *The Costs of Mass Deportation? Expert Breaks Down Trump’s Immigration Plan*, Amanpour & Company, (Oct. 28, 2024), <https://www.youtube.com/watch?v=Dmfo3atidKE> (same).

¹⁷ See Am. Immigr. Council, *Torrance County Detention Facility: Troubling Role in Detaining Haitian Migrants During the 2021 Del Rio Incident* (2024), <https://www.americanimmigrationcouncil.org/foia/torrance-detention-facility>; Am. Immigr. Council, *Ohio, We Have a Problem: Border Patrol & Local Law Enforcement’s Patterns & Tactics of Abuse in Ohio’s Immigration Enforcement* (2024), <https://www.americanimmigrationcouncil.org/foia/ohio-border-patrol-abuse>; Am. Immigr. Council, *Refugee Resettlement in U.S. Cities* (2019), https://data.americanimmigrationcouncil.org/en/refugee-resettlement-us/#exploratory_tool

¹⁸ The Council’s website received 4,506,460 views from 2,952,034 different users in 2024.

¹⁹ See <https://x.com/immrcouncil>.

especially the concerns that EOIR is coordinating with ICE to facilitate arrests and dismissals. *Cf. CREW*, 2025 WL 752367, at *13 (expediting a request for records about the U.S. DOGE Service); *Protect Dem. Proj.*, 263 F. Supp. 3d 293 at 299 (expediting a request for records about a possible unlawful airstrike on Syria); *Am. Civil Liberties Union of N. Cal. v. U.S. Dep’t of Def.*, No. C. 06-01698, 2006 WL 1469418, at *6-7 (N.D. Cal. May 25, 2006) (expediting a request for records about possible unlawful military surveillance of protestors); *Freedom Coalition of Doctors for Choice v. Ctrs. For Disease Control & Prevention*, 2:23-cv-102, 2024 WL 69084, at *14 (N.D. Tex. Jan. 5, 2024) (expediting a request disputing the effectiveness of COVID-19 vaccines).

IV. FEE WAIVER REQUEST

Requestors seek a fee waiver since “disclosure of the requested records is in the public interest.” 5 U.S.C. § 552(a)(4)(A)(iii). EOIR must construe “the FOIA fee waiver provision . . . liberally . . . in favor of waivers for noncommercial requesters” like Requesters. *Schoenman v. FBI*, 604 F. Supp. 2d 174, 188 (D.D.C. 2009). Disclosure is in the public interest where it (A) “is likely to contribute significantly to public understanding of the operations or activities of the government” and (B) “is not primarily in the commercial interest of the [R]equesters.” 5 U.S.C. § 552(a)(4)(A)(iii); *see also* 28 C.F.R. § 16.10(k)(1). Requesters satisfy both requirements.

A. DISCLOSURE OF THE INFORMATION IS IN THE PUBLIC INTEREST

Disclosing the requested records is likely to contribute significantly to the public’s understanding of the extent that EOIR leadership and support staff have coordinated with ICE OPLA leadership to facilitate arrests, dismissals, and enforcement actions in immigration courts.

EOIR must consider two factors when assessing a disclosure’s contribution to public understanding of a government activity or operation, *see* 28 C.F.R. § 16.10(k)(2): (i) whether the request has a “direct and clear” rather than “remote or attenuated” connection to “identifiable operations or activities of the federal government”; and (ii) whether disclosure “would be likely to contribute significantly to public understanding of those operations or activities.” *Id.* § 16.10(k)(2)(i)-(ii). Each factor supports a fee waiver here.

1. *Request Has a Direct and Clear Connection to Government Operations or Activities*

First, this request has a direct and clear relation to the following governmental operations and activities: the extent that EOIR leadership and support staff have coordinated with ICE OPLA leadership to facilitate arrests, dismissals, and enforcement actions in immigration courts.

2. *Records Sought Will Contribute Significantly to Public Understanding of the Above*

Second, disclosing the records sought will “contribute significantly to public understanding of” the above activities. *Id.* § 16.10(k)(2)(ii). Such contribution exists where “[d]isclosure of the requested information [is] meaningfully informative about [these] activities” and “contribute[s]

to the understanding of a reasonably broad audience of persons interested in the subject, as opposed to the individual understanding of the requester.” *Id.* § 16.10(k)(2)(ii)(A)-(B). Both criteria are satisfied here.

i. DISCLOSURE OF RECORDS IS MEANINGFULLY INFORMATIVE

Disclosing requested records will be meaningfully informative about the extent that EOIR leadership and support staff have coordinated and cooperated with ICE OPLA leadership to facilitate arrests, dismissals, and enforcement actions in immigration courts. Disclosure is meaningfully informative where disclosed information is not “in the public domain, in either the same or a substantially identical form.” *Id.* § 16.10(k)(2)(ii)(A).

Here, as demonstrated by the media coverage cited above, the public only knows that ICE is arresting noncitizens at or near immigration courts after moving to dismiss their immigration cases and that immigration judges are granting many dismissals, thereby allowing ICE to pursue expedited removal.²⁰ Media coverage has alluded to, and expressed concern about, possible EOIR coordination with ICE.²¹ Public knowledge does not extend to the extent or specifics of any such coordination. Requested records are therefore “meaningfully informative” about each of these activities.

ii. DISCLOSURE OF RECORDS CONTRIBUTES TO UNDERSTANDING OF A REASONABLY BROAD AUDIENCE

Disclosing requested records will contribute to the understanding of a reasonably broad audience of persons interested in the extent that EOIR leadership and support staff have coordinated and cooperated with ICE OPLA leadership to facilitate arrests, dismissals, and enforcement actions in immigration courts.

Requesters presumably satisfy this consideration as representatives of the news media. *Id.* § 16.10(k)(2)(ii)(B). They both “gather[] information of potential interest to a segment of the public, use[] [their] editorial skills to turn the raw materials into a distinct work, and distribute[] that work to an audience.” *Id.* § 16.10(b)(6); see also *Serv. Women’s Action Network v. Dep’t of Def.*, 888 F. Supp. 2d 282, 287-88 (D. Conn. 2012) (finding that ACLU is a news media representative); cf. *Elec. Privacy Info. Ctr. v. Dep’t of Def.*, 241 F. Supp. 2d 5, 10-15 (D.D.C. 2003) (finding that an organization similar to the Council is a news media representative).

Additionally, and alternatively, the ongoing and extensive media coverage in nationwide, state, and local outlets about the dismissal of immigration cases and ICE arrests at and near immigration courts shows that these matters interest a reasonably broad audience. Requesters

²⁰ See generally Media articles cited in footnotes 4-13.

²¹ Ferré-Sadurní re: Lawsuit, *supra* n. 4; Bernstein, *supra* n. 4; Khan, *supra* n. 4; Yahr, *supra* n. 4; Conklin & Melugin, *supra* n. 4; Aleaziz et al., *supra* n. 4; Díaz & Alvarez, *supra* n. 4; Schmidt, *supra* n. 4.

intend and are well-equipped to inform this audience about the information contained in responsive records, as they are experts in educating the public on immigration issues.

As detailed further in the expedited processing section, the Council analyzes government records—including those obtained through FOIA requests like this one—in interactive web reports and other publications available for free on its website.²² And it circulates these publications for free through its website,²³ blog, email newsletters, and an X account with 64.9 thousand followers. It intends to publish content about records obtained from this request on its website and otherwise disseminate that content to its readers and the larger public.

Similarly, LatinoJustice PRLDEF produces newsletters, blogs, reports, opinion, editorials, and video interviews about the constitutional rights and equal protection of Latinos, immigrants, and other marginalized communities.²⁴ And it circulates these publications for free through its social media accounts. All of its materials are free and available to the public on its website.

In sum, Requesters intend to analyze the records they receive from this request and educate a broad audience of the interested public about them. And, Requesters have a demonstrated ability to do so.

B. REQUESTERS' LACK OF COMMERCIAL INTEREST

Turning to commercial interest, disclosure is not primarily in Requesters' commercial interest. As nonprofits, Requesters have no commercial interest in the records requested. *See Am. Ctr. for L. & Just. v. U.S. Dep't of Homeland Sec.*, 573 F. Supp. 3d 78, 84 (D.D.C. 2021) (“[N]onprofit organizations by definition have no commercial interests.”); *Am. Immigr. Council v. U.S. Dep't of Homeland Sec.*, 82 F. Supp. 3d 396, 406 (D.D.C. 2015) (finding that the Council has no such interest in its record requests). Rather, the request furthers Requesters' work to increase public understanding of immigration processes, including the extent that EOIR leadership and support staff have coordinated and cooperated with ICE OPLA leadership to facilitate arrests, dismissals, and enforcement actions in immigration courts.

Alternatively, and additionally, the public interest in obtaining a better understanding of EOIR's actions discussed above exceeds any commercial interest that EOIR may ascribe to Requesters in records responsive to this request.

²² See, e.g., Torrance County Detention Facility: Troubling Role in Detaining Haitian Migrants During the 2021 Del Rio Incident, *supra* n. 15; Ohio, We Have a Problem: Border Patrol & Local Law Enforcement's Patterns & Tactics of Abuse in Ohio's Immigration Enforcement, *supra* n. 15; Refugee Resettlement in U.S. Cities, *supra* n. 15.

²³ The Council's website received 4,506,460 views from 2,952,034 different users in 2024.

²⁴ See, e.g., LatinoJustice PRLDEF, 100 Days Later: The Harm So Far to Latinx Communities (April 2025), <https://www.latinjustice.org/en/pressreport/100-days-later-harm-so-far-latinx-communities>; LatinoJustice PRLDEF, A Promise to Harm: What's at Stake for the Latino Community in Project 2025 (Oct. 2024), <https://www.latinjustice.org/en/pressreport/promise-harm-whats-stake-latinx-community-project-2025>.

Thank you for your attention to this request. If you have any questions regarding this request, please do not hesitate to contact us.

Very truly yours,

/s/ Chris Opila _____

Christopher (“Chris”) Opila
Staff Attorney (Transparency)
American Immigration Council
PMB2026
2001 L Street N.W., Suite 500
Washington, DC 20036
202-507-7699 | copila@immcouncil.org

/s/Rex Chen _____

Rex Chen
Supervising Counsel for Immigrant Rights
LatinoJustice PRLDEF,
475 Riverside Drive Suite 1901
New York, NY 10115
212-219-3360 | rchen@latinojustice.org