



## Immigration Issues

### SENATE STATE/LOCAL IMMIGRATION ENFORCEMENT BILL GOES FURTHER THAN HOUSE "CLEAR ACT" BILL

A bill recently introduced in the Senate that would compel state and local police to enforce federal civil immigration law goes even further in jeopardizing the rights of non-U.S. citizens than a similar bill that was introduced in the House of Representatives earlier this year. If the bill as currently written were to become law, any interaction between state or local police and people who look or sound foreign would be fraught with risk, and states would be compelled to spend their limited resources trying to decide who is in violation of immigration law—a complicated and costly undertaking—instead of protecting public safety and national security. The bill's provisions also would undermine states' reasonable judgments about what policies best promote public safety, a development that, in light of the congressional majority's touting of states' rights against a too-powerful federal government, is highly ironic.

The Homeland Security Enhancement Act (S. 1906) was introduced on Nov. 20, 2003, by Sens. Jeff Sessions (R-AL) and Zell Miller (D-GA). Its counterpart in the House is HR 2671, the Clear Law Enforcement for Criminal Alien Removal (CLEAR) Act. (For more on HR 2671, see "Sweeping Legislation Introduced to Require Local Police to Enforce Immigration Law," IMMIGRANTS' RIGHTS UPDATE, Sept. 4, 2003, p. 1.) The Senate bill reportedly was drafted to meet policy positions and recommendations provided by Kris Kobach, former counsel to Attorney General John Ashcroft and currently Republican candidate for Congress in Kansas.

The following are among the Senate bill's key provisions:

- It would criminalize all immigration law violations committed by non-U.S. citizens. (HR 2671 criminalizes only those violations related to "unlawful presence.")
- The bill would force states to enforce immigration law by withholding State Criminal Alien Assistance Program (SCAAP) funds, which reimburse states for incarcerating noncitizens, if the states do not repeal policies that limit police enforcement of immigration laws.
- Cash-strapped states would be required to take on these additional responsibilities without receiving additional federal funding. In contrast to HR 2671, S. 1906 would not provide states with funds obtained via the forced forfeiture of undocumented immigrants' assets, or from visa processing fees or administrative judgments. Neither does the bill provide for grants to state and local police agencies to pay for the equipment and technology they would need to enforce federal immigration law.
- S. 1906 would authorize entering specific types of immigration information into the National Crime Information Center (NCIC) database—i.e., records regarding noncitizens who have received final orders of removal, agreed to voluntarily depart the U.S., or overstayed temporary visas. (HR 2671, in contrast, would not limit the type of immigration violation-related information that could be entered into the NCIC.)
- S. 1906 would require that the federal government acquire enough new detention space to hold 10,000 more individuals in federal custody or at federal expense, and the bill includes new provisions related to state and local facilities maintaining an incarcerated criminal non-U.S. citizen in custody between the time that the individual's criminal sentence has been served and when

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the federal government can arrive to take the person into custody.

- The bill would, in effect, require that driver's licenses issued by states to non-U.S. citizens who are not permanent residents expire when the noncitizen's authorization to remain in the U.S. expires. The bill would force the states to adopt such a policy by forbidding federal agencies to accept as identification any driver's license that does not expire with the nonimmigrant visitor's authorization to be in the U.S. and by denying highway safety funds to states that issue driver's licenses to noncitizens who are not in lawful status.

- S. 1906 would narrowly limit the documents that the federal government could accept as identification when providing federal public benefits or services in the U.S. The only acceptable documents would be (1) those issued by a U.S. or state authority and subject to verification by law enforcement agencies or (2) passports in the possession of people lawfully in the U.S. who are from countries whose nationals are not required to obtain a visa before visiting the U.S. (i.e., nonimmigrant visitors from "visa waiver" countries). If it became law, this provision would preclude the use for such purposes of a vast array of commonly accepted identity documents issued by countries around the world to their citizens, including passports, consular ID cards, national ID cards, birth certificates, foreign driver's licenses, and school ID cards. It would also preclude the use of many nongovernmental documents issued in the U.S. itself, including hospital birth certificates, school ID cards, and church baptismal certificates.

#### **SOME SPECIAL REGISTRATION REQUIREMENTS ENDED, BUT PROGRAM CONTINUES**

Though it has been widely publicized that the Dept. of Homeland Security has ended the special registration program that requires certain nonimmigrant visitors—particularly those who are male citizens or nationals of predominantly Islamic countries—to report in person to an immigration office to register or reregister, in fact the DHS only has suspended the requirements (1) that all such registrants reregister annually and (2) that those who register at a port of entry report for a follow-up interview within 10 days of having been in the United States for 30 days. According to an advisory issued jointly by the American Immigration Lawyers Association (AILA) and the ACLU Immigrants' Rights Project, all other special registration-related requirements, as well as the program itself, "are *not* changed and remain in effect."

The consequences for those subject to special registration who fail to comply with all the continuing requirements can be dire. They could be denied admission to the U.S. on a subsequent attempt to enter, or be denied other immigration benefits, or be subject to criminal prosecution and/or removal proceedings.

The DHS interim rule suspending the annual re-registration and the 30-day follow-up interview requirements became effective the day it was published, Dec. 2, 2003. Any special registrant whose personal deadline to register or reregister fell before Dec. 2 and who willfully failed to do so before that deadline is considered to have violated the terms of his or her permission to be in the U.S. (For more on special registration-related deadlines, see "Deadlines Approaching for Re-registration under 'Call-In' Special Registration Program," IMMIGRANTS' RIGHTS UPDATE, Oct.

21, 2003, p. 6, and "DOJ Expands 'Call-In' Special Registration, Grants Extensions of the Registration Periods for All Groups," IRU, Feb. 21, 2003, p. 1.)

Nonimmigrants who were subject to "call-in" registration under the program (i.e., males who are nationals of 25 designated countries who entered the U.S. as nonimmigrants before port-of-entry registration began on Oct. 1, 2002), as well as those who were required to register when they entered the U.S. at a port of entry, must still report in person to a DHS inspecting officer before departing from the U.S. and are still required to depart only through specially designated ports. Though the interim rule provides that the latter requirement may be waived, the AILA-ACLU advisory warns that obtaining such a waiver could be difficult.

Persons who were or are specially registered and who remain in the U.S. for 30 days or more also are required to notify the DHS if they change their address or residence, or their employment, or, if they are on a student visa, where they are studying. Such a notification must be filed on Form AR-11 within 10 days of the change. (The form is available at [www.uscis.gov](http://www.uscis.gov).) However, nonimmigrants with F, J, or M visas whose information is entered in the Student and Exchange Visitor Information System (SEVIS) do not have to notify the DHS of address/residence or educational institution changes, so long as any such change is recorded in the SEVIS within 10 days of the change. Any change in employment, though, must be reported on the AR-11.

Nonimmigrants who are citizens or nationals of Iraq, Iran, Syria, Libya, and Sudan are still subject collectively to special registration upon entering the U.S., and inspecting officers at ports of entry may require other nonimmigrant visitors to register on a case-by-case basis. In addition, under the interim rule the DHS may, at any time it chooses, require selected persons who have registered in the past to reregister; and it may, at its discretion, institute a new "call-in" registration for nonimmigrant visitors who have not previously been required to register. The rule provides that notification of any re-registration requirement to registrants or former registrants may be given via publication of a notice in the Federal Register, or through regular mail, or e-mail, or personal service. It is crucial, then, that registrants and former registrants remain carefully on the lookout for any such notices.

Since the rule that provides for the changes described above is an interim one, it also is possible that, when published, the final rule will make further changes in the special registration program. Those seeking to comment on the interim rule with the intent of affecting how the final rule is written must submit their comments in writing by Feb. 2, 2004.

68 Fed. Reg. 67578-84 (Dec. 2, 2003).

#### **BIA BACKLOG MERELY SHIFTED TO FEDERAL COURTS, STUDY FINDS**

As a result of reforms in the way the Board of Immigration Appeals operates that were instituted in 2002, the percentage of appeals to the BIA that the Board grants has plummeted from 25 percent before the changes were instituted to 10 percent now. And as a result of this dramatic change, the percentage of BIA decisions that were appealed to the federal courts tripled between Oct. 2001 and Oct. 2002, from 5 percent to 15 percent. These are among the findings of a study conducted by the law firm of Dorsey & Whitney at the request of the American Bar Association Commission on Immigration Policy, Practice and Pro

Bono.

Under the procedural reforms instituted in 2002, the merits of most appeals may now be decided by a single BIA member, who may issue only a brief order without a written opinion. Before the reforms, single-member review was allowed in only a very limited number of cases; most cases were decided by three-member panels. Now, review by three-member panels is limited to cases in which the original single reviewer decides that it is necessary in order to settle inconsistencies among decisions issued by different immigration judges, establish precedent, or correct a clear legal error, violation of precedent, or an IJ's "clearly erroneous" determination of fact. However, the decision to refer such a case to a three-member panel is not mandatory; and single members can, and have, reversed IJs' decisions. (For more details about the BIA procedural reforms and immigrant rights advocates' responses to them, see "Five Veteran BIA Members Forced to Resign," IMMIGRANTS' RIGHTS UPDATE, June 3, 2003, p. 3, and "Attorney General Issues Final Rule to Reform BIA," IRU, Sept. 10, 2002, p. 1.)

The Dorsey & Whitney study found that the procedural reforms, set in place ostensibly to streamline the immigration appeals process and pare down the large backlog of cases waiting to be decided, instead has shifted much of the backlog burden to the federal courts. And since the courts end up remanding many of the cases to the BIA, in the long run the backlog is destined to end up back with the BIA.

Based on the study's findings and the obvious deficiencies of the new procedures, the ABA Commission on Immigration Policy, Practice and Pro Bono, has called on the U.S. Justice Dept. to discard the 2002 reforms and reinstitute the prior procedures. In the likely event that the reforms are not reversed, the commission recommends a number of changes to the present procedures, an important one being that "At a minimum, each case should have a written decision that addresses the errors raised by the appellant, the basis for determining that the case was correctly decided below, the specific legal precedents on which the decision is based, and the reason that the case was assigned to a single Board member."

The ABA commission's summary of the study's findings and its complete set of recommendations in response to them ("Seeking Meaningful Review: Findings and Recommendations in Response to Dorsey & Whitney Study of Board of Immigration Appeals Procedural Reforms," Oct. 2003) is available at [www.abanet.org/immigration/bia.pdf](http://www.abanet.org/immigration/bia.pdf). The law firm's own summary of its study's findings is available at [www.dorsey.com/files/upload/Summary-Conclusion\\_DorseyABASTudy.pdf](http://www.dorsey.com/files/upload/Summary-Conclusion_DorseyABASTudy.pdf).

## Litigation

**1ST CIRCUIT OVERTURNS BIA "AFFIRMANCE WITHOUT OPINION"** – The U.S. Court of Appeals for the First Circuit has issued a decision on a petition for review, reversing and remanding the case to the Board of Immigration Appeals, where a BIA member had used the "affirmance without opinion" (AWO) procedure to uphold a decision of an immigration judge. In so ruling, the court found that it has jurisdiction to review the BIA's decision to use the AWO

procedure and that remand was necessary because whether the BIA was justified in using the procedure could not be determined without an explanation by the BIA. Under the AWO procedure, appeals from IJ decisions may be reviewed by a single BIA member and "affirmed without opinion" even where the BIA member does not agree with the IJ decision but believes that any error was without prejudice.

In this case, the respondent, Lahouari Haoud, is an Algerian national who entered the U.S. on a six-month nonimmigrant visa in 1995 and then overstayed. In Dec. 1999, agents of the Federal Bureau of Investigation and local police came to his home in Boston and arrested him for carrying a fraudulent green card, and also questioned him about terrorist activities. Criminal charges were not filed against him, but his arrest was publicized in numerous newspaper and television reports, connecting him with a general fear of terrorist actions on the eve of the new millennium.

The Immigration and Naturalization Service proceeded with removal charges against Haoud based on his possession of a fraudulent green card and his having overstayed his visa. At his removal hearing, Haoud applied for asylum, claiming that the publicity regarding his arrest associated him with an Algerian terrorist group and would lead to his persecution were he to be returned to Algeria. He also applied for withholding of removal, relief under the Convention Against Torture, and voluntary departure. The immigration judge denied the asylum application on the grounds that Haoud had failed to establish changed circumstances to excuse his filing the application more than one year after his last entry into the United States. The IJ also found on the merits of the claim that Haoud had failed to establish either past persecution or a well-founded fear of persecution, and that he could not make this showing based solely on media publicity in the U.S. The IJ also denied the other applications for relief, and Haoud appealed to the BIA.

In support of his appeal, Haoud raised another case decided after his hearing, *In re Touarsi*, in which the BIA granted asylum to another Algerian man who had been arrested in Boston on the same night as Haoud and on the same suspicion of terrorism. In that case, the BIA reversed the IJ's denial of asylum, finding that the respondent, Touarsi, had a well-founded fear of persecution in Algeria based on imputed political opinion, relying on the media publicity in the U.S.

In Haoud's case, the BIA used the AWO procedure to uphold the IJ's decision and dismiss the appeal. Haoud then filed a petition for review with the court of appeals, seeking review of the denial of asylum.

On appeal, the government contended that the court lacked jurisdiction to review the denial of asylum, because of section 208(a)(3) of the Immigration and Nationality Act. It provides that "No court shall have jurisdiction to review any determination of the Attorney General under paragraph (2)," which includes the determination that an asylum application is barred by the one-year deadline.

The court agreed that it would not have jurisdiction to review an asylum denial based on the one-year deadline. However, the court also found that this conclusion does not resolve the case, because under the AWO procedure the BIA could have disagreed with the IJ's finding regarding the one-year deadline and still upheld the IJ decision regarding the merits of the asylum claim.

In that case, the court would have jurisdiction to review the asylum claim on the merits.

The court also rejected the government's claim that the BIA's decision to use the AWO procedure is an unreviewable discretionary determination. The court found that "the Board's own regulation provides more than enough 'law' by which a court could review the Board's decision to streamline." The court noted that under the regulation, "the Board cannot affirm an IJ's decision without opinion if the decision is incorrect, errors in the decision are not harmless or immaterial, the issues on appeal are not squarely controlled by Board or federal court precedent and involve the application of precedent to a novel factual situation, or the issues raised on appeal are so substantial that a full written opinion is necessary."

In this case, the court found that the lack of explanation for the decision by the BIA prevented it from determining whether streamlining under the regulation was appropriate. There is no way to determine whether the BIA's decision denying asylum was based on the one-year deadline or on the merits of the asylum claim. Moreover, the BIA failed to explain or reconcile its decision with its prior decision in *Touarsi*, which appears to be in direct conflict with this decision. The court therefore remanded the case to the BIA to provide "a reasoned administrative decision."

*Haoud v. Ashcroft*, \_\_\_ F.3d \_\_\_, No. 02-2395 (1st Cir. Nov. 25, 2003).

**6TH AND 9TH CIRCUITS RULE ON COURTS' AUTHORITY TO STAY VOLUNTARY DEPARTURE PERIOD PENDING APPEAL** – The U.S. Court of Appeals for the Sixth Circuit has issued a decision granting a petitioner's motion to stay the period for voluntary departure pending the resolution of his petition for review. The government did not oppose the petitioner's motion for a stay of removal but did oppose the motion to stay voluntary departure, contending that the court did not have jurisdiction to grant voluntary departure. The court rejected this argument, following the U.S. Court of Appeals for the Ninth Circuit's decision in *El Himri v. Ashcroft*, 344 F.3d 1261 (9th Cir. 2003), to find that the court's equitable power extends to stays of voluntary departure (see "9th Circuit Rules Court Can Stay the Period for Voluntary Departure Pending Review of a Removal Order," IMMIGRANTS' RIGHTS UPDATE, Oct. 21, 2003, p. 7).

In addition, a panel of the Ninth Circuit has issued an unpublished decision resolving an issue that was left undecided in *El Himri*—whether the court's equitable power allows it to grant a motion to stay voluntary departure made after the expiration of the period of voluntary departure that was granted by the Board of Immigration Appeals. In this case, the court had granted the petitioners' motion for a stay of removal on Dec. 12, 2002. At that time the petitioners had not requested a stay of voluntary departure, no doubt because the court had not yet issued its decision in *Zazueta-Carrillo v. Ashcroft*, 322 F.3d 1166 (9th Cir. 2003), which found that because of the statutory framework of removal proceedings, the filing of a petition for review no longer automatically stays voluntary departure (see "9th Circuit Finds Filing of Petition for Review Does Not Suspend Deadline for Voluntary Departure Granted by BIA," IRU, Apr. 8, 2003, p. 5). Subsequently, at oral argument, counsel for the petitioners made an oral motion to stay voluntary departure *nunc pro tunc*. The court granted

the motion, noting that the applicable standard is the same as for a stay of removal, which had previously been granted. Because the decision is unpublished, under Ninth Circuit rules it is not considered binding precedent for other cases.

*Nwakanma v. Ashcroft*, \_\_\_ F.3d \_\_\_, No. 03-4317 (6th Cir., Dec. 10, 2003);

*Villanueva v. Ashcroft*, No. 02-73089 (9th Cir. Nov. 4, 2003).

**SETTLEMENTS REACHED IN *CSS* AND *LULAC/NEWMAN*; AMNESTY APPLICATION PERIOD FOR CLASS MEMBERS COULD BEGIN IN MARCH** –

Attorneys representing undocumented immigrants in *Catholic Social Services v. Meese* and *Newman v. Bureau of Citizenship and Immigration Services* (formerly *League of United Latin American Citizens (LULAC) v. INS*) have announced that the secretary of Homeland Security has approved settlements in the cases that will allow class members to apply for permanent resident status beginning about March 2004.

The two class action lawsuits were filed while the Immigration and Naturalization Service was implementing the amnesty program provided for by the Immigration Reform and Control Act of 1986. The amnesty program provided a means by which undocumented immigrants who had resided continuously in the United States between 1982 and 1987 could eventually become lawful permanent residents. The two lawsuits were filed in response to an INS policy of rejecting applications submitted by individuals who had traveled abroad for brief periods during the required period of continuous residence in the U.S.

After almost 15 years of litigation, during which the two cases were appealed first to the Ninth Circuit Court of Appeals, then to the Supreme Court, which remanded them back to the federal district courts in which they had first been filed, the parties began settlement discussions in Jan. 2003 after both courts indicated they were prepared to enter final injunctions against the INS. The parties reached settlement agreements in May 2003, but each agreement required the consent of the Dept. of Justice and the secretary of Homeland Security. After the government consented to the agreements (on Nov. 17, 2003), the courts issued notices to the class members in each case announcing the agreements and giving class members 30 days (until Dec. 29, 2003) to file any objections to them.

It is expected that the courts will grant final approval of the settlements in early Jan. 2004. If they do, in approximately March 2004 a one-year period will begin during which class members will be permitted to file applications for amnesty under the provisions of the 1986 amnesty law. The plaintiffs' attorneys estimate that as many as 200,000 people might be eligible to apply for amnesty under the terms of the settlement agreements.

As during the initial amnesty application period, amnesty applications filed under the settlement agreements will be confidential, and the government is prohibited from using the information in them to begin removal proceedings against applicants who are found not to qualify for the benefit. Class members also will be entitled to work authorization while their amnesty applications are processed by U.S. Citizenship and Immigration Services.

For further information about the settlements, contact Peter Schey (323-251-3223) or Carlos Holguin (213-388-8693 x. 109) of the Center for Human Rights and Constitutional Law, or go to the center's Web site at [www.centerforhumanrights.org](http://www.centerforhumanrights.org).

## Public Benefits Issues

**ICHIA PROVISIONS STRIPPED FROM MEDICARE BILL SIGNED BY PRESIDENT** – Provisions that would have allowed states to provide health coverage through Medicaid and the State Children's Health Insurance Program to lawfully present children and pregnant women, regardless of their date of entry into the United States, had been stripped from the recently passed Medicare bill by the time Congress voted to approve it. The controversial bill, which President Bush signed on Dec. 8, 2003, adds a prescription drug benefit for some elderly and disabled Medicare recipients and, in a move to begin privatizing Medicare, makes federal subsidies available to private insurance companies that offer health plans to people who are Medicare-eligible.

The provisions that would have benefited immigrant women and children (known to advocates as the Immigrant Children's Health Improvement Act (ICHIA) provisions) had been included in the Senate-passed version of the Medicare Prescription Drug, Improvement and Modernization Act of 2003. Under the ICHIA provisions, beneficiaries would no longer have been subject to sponsor "deeming" or liability. Deeming rules count the income and assets of an immigrant's sponsor as available to the immigrant for purposes of determining the immigrant's eligibility for certain public benefits.

The ICHIA provisions were included in the Senate version of the Medicare bill despite opponents' efforts to eliminate it in the Finance Committee and on the Senate floor. Among the provisions' chief champions was Sen. Max Baucus (D-MT), who was a

member of the conference committee charged with reconciling the House and Senate versions of the Medicare bill. The ICHIA provisions remained on a short list of undecided issues even as conference committee members announced that they had reached a compromise. In the last 24 hours before the bill was to be voted on by the House, strong opposition to the provisions by mostly Republican immigration restrictionists won the day, and they were stripped out of the final package.

However, the final package includes a provision introduced by Sen. Jon Kyl (R-AZ) that, beginning in 2005, provides for \$250 million a year over four years to reimburse hospitals, physicians, and ambulance service providers for care provided to undocumented immigrants. Two thirds of the funds will be allocated to states based on federal government estimates of the number of undocumented individuals in each state. One third of the money will be distributed to the states with the highest rates of apprehensions of undocumented people. The payments are to be made directly to providers.

However, in return for agreeing to vote in favor of the Medicare bill, Rep. Dana Rohrabacher (R-CA) extracted a promise from House Speaker Dennis Hastert (R-IL) to allow a vote on a provision Rohrabacher has put forward that would require health care providers to report any undocumented immigrants to federal immigration officials within two hours of providing treatment or services to them. Health care, immigrant rights and faith-based advocates, hospital groups, and congressional leaders from both sides of the aisle have strongly criticized the provision and vowed to mount a vigorous campaign to ensure its defeat when it comes to a floor vote next year.

## **The National Immigration Law Center . . .**

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