

NYC Mayor's Office of Immigrant Affairs

Oversight Hearing - Legal Services for Immigrant New Yorkers Before The Committee on Immigration

Testimony of Commissioner Manuel Castro NYC Mayor's Office of Immigrant Affairs (MOIA)

October 28, 2025

Thank you to Chair Avilés and the Committee on Immigration for holding this hearing and for your partnership the last four years.

My name is Manuel Castro, and I serve as the Commissioner of the Mayor's Office of Immigrant Affairs (MOIA). I am joined today by Deputy Commissioner of Programs and Policy Lorena Lucero and Director of Programs and Policy Initiatives Enrique Chavira Cantú.

Overview

Look, I know this is a difficult time for New York City immigrants. We've all seen what's happening up the street in Federal Plaza and in neighborhoods across the city. Last week, federal immigration enforcement conducted a raid that targeted and detained West African immigrants on Canal Street. Actions such as these have caused tremendous distress, and I know many of across the city, like me, have family and loved ones directly impacted.

So I want to say this to you clearly and directly: MOIA condemns these raids. This City stands by immigrant New Yorkers who are trying to pursue their American Dream.

I would also like to take this opportunity to invite our immigrant community to continue accessing City services. These are your rights. As you've heard from the Schools Chancellor: Continue to send your children to school. From the Police Commissioner: If you witness or experience a crime, call 911. From the President of the Health + Hospitals system and the Commissioner of the Department of Health and Mental Hygiene: Seek medical care at our public hospitals when you need it. This city has people, public servants, educators, healthcare workers, your neighbors, who care deeply about your safety and your future.

Today I'm proud to share that MOIA's immigration legal services and know your rights programs continue to expand access to critical resources and information for immigrant communities in New York City. Since the beginning of this administration, we've nearly doubled the funding for

immigration legal services. MOIA invests in legal services capacity by contracting with community-based organizations (CBOs) to provide these supports. Our MOIA Centers operate as part of a citywide model with hubs in the neighborhoods where immigrants live and work. As we reflect on the first quarter of Fiscal Year 2026, we recognize that these programs are built on years of sustained, mission-driven work.

Let me begin with a brief overview of MOIA's immigration legal programs.

MOIA Centers: Immigration Legal Services

MOIA Immigration Legal Support Centers

This summer, MOIA launched the MOIA Immigration Legal Support Centers (LSC) program. The network consists of 38 MOIA Immigration Legal Support Centers (composed of 29 unique contractors) providing culturally and linguistically competent immigration legal support across the five boroughs.

The LSC model was created to leverage the expertise and experience of nonprofits and community-based organizations who are already embedded in the City's immigrant communities. This model encourages a wider, decentralized approach for immigration legal providers to build or strengthen connections with schools, hospitals, and libraries.

This new model represents a flexible approach that meets the current and emerging needs of New York City's immigrant communities both in their languages and in their neighborhoods. Since the program's July 2025 launch, the LSCs have conducted approximately 3,500 comprehensive legal screenings, supporting immigrants on a variety of legal needs. The most common case types include naturalization, humanitarian relief, and Lawful Permanent Resident ("green card") status.

Rapid Response Legal Collaborative

The Rapid Response Legal Collaborative (RRLC) has historically provided legal assistance to immigrant New Yorkers who are detained or at imminent risk of detention or deportation. In light of the current needs, MOIA has increased our investment in the RRLC by \$1.1 million this fiscal year.

MOIA is also collaborating with New York City Public School's Project Open Arms to implement a dedicated referral pathway and know your rights trainings for NYC students (and their immediate family members) who may be eligible for the Rapid Response Legal Collaborative's services.

Haitian Response Initiative

The Haitian Response Initiative is a network of eight legal and community-based organizations focused on serving the needs of Haitian New Yorkers. The program provides culturally and linguistically competent case management, social services, referrals to resources such as housing and mental health, and legal assistance. In the first quarter of FY 26, the Haitian Response Initiative conducted 198 legal screenings and over 400 case management screenings, connecting individuals to various support services.

Legal Technical Assistance Programs

MOIA partners with experts in immigration law and legal services provision to provide free access to critical legal technical assistance and training resources for our MOIA Centers.

All MOIA Centers' program providers have free access to select online trainings and webinars to a nationwide legal technical assistance program through Catholic Legal Immigration Network, Inc. (CLINIC). The MOIA Legal Technical Mentorship program provides dedicated support to the LSC network. And in FY26, the Immigrant Justice Corps (IJC) is offering additional legal technical support for LSCs.

Having access to multiple legal technical assistance programs and resources is important for immigration legal professionals to maintain their professional ethical duties, train and support the professional growth of their staff and volunteers, and to advance informed decision-making on advocacy and program operations. This program also connects providers with trainings and resources that allow them to respond to federal policy changes.

MOIA Immigration Legal Support Hotline

We continue to fund the MOIA Immigration Legal Support Hotline, operated by Catholic Charities Community Services. In calendar year 2024, over 64,000 people called the MOIA Legal Hotline. So far in calendar year 2025, the MOIA Legal Hotline has received calls from nearly 46,000 people. Trained Hotline Counselors help immigrant New Yorkers navigate their options for connecting to comprehensive immigration legal screenings. The MOIA Legal Hotline has also held phone banks to provide targeted information in response to urgent needs in the immigrant community, including on immigration services fraud.

Immigrant Rights Workshops

The Immigrant Rights Workshops (IRW) providers deliver immigrant rights presentation to shelters, faith-based organizations, schools, and other community spaces. The presentations cover a wide range of topics, including accessing City services (including immigration legal help) and avoiding fraudulent legal services.

In the first quarter of Fiscal Year 2026, the IRWs delivered 85 presentations and reached nearly 2,000 people. In Fiscal Year 2025, the IRWs delivered 455 presentations and reached nearly 10,000 people. The IRWs bring critical information to New Yorkers to empower them with tools to understand their legal rights and connect to support services.

Conclusion

Lastly, I want to thank the many public servants throughout the city government who continue to show up for immigrant New Yorkers. You know who you are, and I hope you are as proud as I am of what we have accomplished together.

I remain committed to ensuring New York City remains a national model for immigrant services. MOIA continues to work to ensure all New Yorkers have the opportunity to build their lives and support their families in this great city. A big thank you to our nonprofit legal service providers that are serving the community during this time of need.

Thank you again for the opportunity to provide this update to the City Council.

The New York City Council Committee on Immigration
Honorable Alexa Avilés, Chair
Oversight - Immigration Legal Services

Oral Testimony of the New York Immigration Coalition
October 28, 2025

Good morning Chair Avilés, and members of the Committee. Thank you for the opportunity to testify today on the state of NYC's immigration legal services ecosystem, and the critical steps that we must take to improve services, support service providers, and scale up to adequately respond to the urgency of this moment. My name is Dave Basnet, and I am the Senior Immigration Rights Policy Manager at the New York Immigration Coalition (NYIC). The NYIC is a statewide network of more than 200 organizations that support immigrants and refugees across New York State.

We commend the Committee and the Council for recognizing that immigrants who reside in NYC are facing unprecedented risk. In today's testimony, I will briefly highlight some of the challenges that are present in the immigration legal services infrastructure, and articulate the immediate need for (1) increased interagency coordination and a de-siloed approach legal services, (2) developing a support fund to assist individuals and families of NYC residents impacted by deportation and detention (3) the expansion of NYIFUP to ensure no NYC resident is left behind.

The federal government's aggressive immigration enforcement regime, backed by over \$170 billion dollars in federal funding, has engendered a constant state of fear and anxiety in immigrant communities. Fears created by the senseless family separations, courthouse arrests, and raids have become a permanent fixture of our daily news cycle, and the new reality that

immigrant families now live in, every single day. Raids just like the militarized operation that took place in Manhattan's Chinatown on Tuesday, October 21st where over 50 masked federal agents carrying military-grade weapons and drove armored vehicles targeted immigrant street vendors. The masked agents indiscriminately arrested bystanders, racially profiled vendors, used batons and pepper spray, and kidnapped community members off the streets.

For the 267,000 immigrants in NYC with pending immigration cases, life goes on with the daily uncertainty of not knowing whether they will return home to their families when they go to court, while they navigate a legal services system that is increasingly fragmented and under-resourced. For the last 10 years, NYC led the nation as a city with a comprehensive model for immigrant inclusion and integration. The infrastructure that made this leadership possible – including citywide legal services with coordinated outreach and clear interagency accountability – has substantially eroded, primarily by numerous policy decisions by the current mayoral administration.

We urge this Committee to listen closely to the concerns and recommendations of the legal service provider community who are the most poised to articulate the necessity of more resources to match the intensifying need and increasing complexity of immigration legal services. Despite historic levels of funding appropriated by Council, legal services remain neither sufficient nor widely accessible, and service providers across the city are at or near capacity. The lack of coordination between agencies and the lack of a centralized body facilitating the variety of immigration legal services provided by the City and its contracted partners has created a bifurcated implementation nightmare: duplicative services with inefficient overlap and gaps in

services. Additionally, due to an emphasis on speed and volume of filings rather than the quality and substance of the filings, and notwithstanding the specialized expertise that certain filings require, the need for centralized coordination and de-siloed legal services is increasingly evident and would fill the implementation gaps that are emerging in legal services delivery across the city. Moreover, in addition to the immigrant New Yorkers and their families who are covered by our existing services, numerous individuals and their families are facing the ripple effects of out-of-state ICE transfers: a worrying trend of NYC residents transferred to jurisdictions and facilities hundreds and thousands of miles away from their families and from our legal service providers. These transfers place significant limits on the ability of legal service providers to continue representing the cases, overstretching their already limited resources. For the families impacted by detention the challenge is surviving without their detained family members who are often the primary source of income.

While this Committee's hearing is an important step, we need tangible steps to follow it.

Today, the NYIC recommends that:

- (1) Council and Administration in consultation with impacted communities, legal service providers, community-based organizations to decisively rebuild a legal services ecosystem that connects disparate LSPs and their efforts to limit duplication and find missed opportunities. This funding must also be baseline and multi-year so that service providers can build sustainable programs that can scale up as need increases, year over year.
- (2) The City must also expand its interpretation of legal service funding to be more holistic and create a new family support fund to assist families impacted by detention and

deportation.

- (3) Increase funding to expand NYIFUP's capacity so that any detained New Yorker can be supported by our services. New York families depend on it.

Thank you again to the Committee and to Chair Aviles for championing the fight for New Yorkers every day.

Submitted by:

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**Testimony of United Neighborhood Houses
Before the New York City Council Committee on Immigration
Council Member Alexis Avilés, Chair**

**Submitted by Paula Inhargue, Policy Analyst
October 28th, 2025**

Thank you, Chair Avilés and members of the New York City Council Committee on Immigration for convening today's hearing. United Neighborhood Houses (UNH) is a policy and social change organization representing 46 neighborhood settlement houses, including 40 in New York City, that reach over 800,000 New Yorkers from all walks of life at 770 locations. A progressive leader for more than 100 years, UNH is stewarding a new era for New York's settlement house movement. We mobilize our members and their communities to advocate for good public policies and promote strong organizations and practices that keep neighborhoods resilient and thriving for all New Yorkers. UNH leads advocacy and partners with our members on a broad range of issues including civic and community engagement, neighborhood affordability, healthy aging, early childhood education, adult literacy, and youth development. We also provide customized professional development and peer learning to build the skills and leadership capabilities of settlement house staff at all levels.

Many of New York's settlement houses started during a significant wave of migration to New York in the late 1800s, and the work of helping individuals and families successfully settle in New York has never ceased, but merely changed and adapted with the times. The settlement house model of providing multiple supports under one roof is time-tested, effective, and continues to help the newest New Yorkers. As the federal administration rapidly targets immigrants across the country, following through on the President's commitment to mass deportation, immigrant communities are increasingly vulnerable. Settlement houses play a crucial role in providing these communities with the support and protection they need.

In the FY26 budget, the City Council worked to secure a historic \$50 million investment in immigrant legal services. This funding is crucial as immigrant communities rely on these programs to understand their rights and navigate a system that is becoming increasingly more complex.

UNH urges the Council to allocate this funding quickly and ensure that it reaches immigrant communities in a trusted way through settlement houses and CBOs. . Settlement houses are already trusted anchors in their neighborhoods, providing holistic, wraparound support that meets families where they are. This approach ensures that immigrant New Yorkers receive not only the legal help they need but also the practical and emotional supports that help them build a life in their new home.

Currently, 13 UNH member settlement houses provide Immigrant and Refugee Legal Services to over 13,000 people every year, with 8 of them expanding or launching new legal services since 2022 to meet the needs of newly arriving migrants. Despite their best efforts, demand continues to far outpace available resources. Increased funding would allow settlement houses to expand these services, and reach even more families in need, many of whom would otherwise go unserved.

By strengthening and expanding free, community-based legal services the Council can ensure that our city remains a place where all New Yorkers, regardless of where they come from, can belong and thrive.

Thank you for your time and for your continued commitment to supporting immigrant New Yorkers, and for working to ensure this funding is allocated quickly to meet urgent community needs.

Thank you for the opportunity to testify. For questions, I can be reached at pinhargue@unhny.org.



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**Adhikaar for Human Rights and Social Justice
Testimony to the New York City Council
Committee on Immigration
October 28, 2025**

To:
Councilmember Alexa Aviles, Chair
Committee on Immigration Members

Thank you, Chair Alexa Avilés, and members of the Committee on Immigration, for holding this hearing. My name is Tsering Lama and I am Senior Manager of Organizing and Policy at Adhikaar for Human Rights and Social Justice. Adhikaar is submitting this testimony alongside our partners from the Rapid Immigration Support and Empowerment (RISE) Network— a network of nearly 20 Asian-led and Asian-serving organizations providing immigration case management and legal services support to New Yorkers. We submit this testimony to uplift the voices and demands of our community in advancing immigration justice, workers’ rights and a just and inclusive New York City.

Adhikaar, meaning “rights” in Nepali, is the only women-led worker and community center serving and organizing the Nepali-speaking community on workers’ rights, immigrants’ rights, youth empowerment, access to healthcare, and language justice. We are often referred to as our community’s 911 and 311 line, serving more than 10,000 Nepali-speaking people a year. Most of our members are women and work in the informal sector as nail salon workers, domestic workers, taxi drivers, and restaurant workers. A majority of our members live in Jackson Heights, Woodside, East Elmhurst, Elmhurst, Corona, Maspeth, Sunnyside, Ridgewood, Jamaica and Flatbush.

Current Immigration Legal Landscape for Asian New Yorkers

In recent years, we have seen an influx of new Nepali speaking immigrants come through our doors. This increase is also reflected in the 2020 census report which stated, “Nepalese population increased over 250%” and has been labeled one of the fastest growing communities in the United States. New members become familiar with Adhikaar through our English for Empowerment classes, workforce development training, or stop by our community center to obtain support for their workers’ rights, immigration, or health issues. Through these programs we create access to information, build community leadership, and grow collective power to win rights for our communities, and dignity and equity for all. For too long, the struggles and demands of communities like ours—immigrant women in low-wage industries— have been rendered invisible.

As Asian Americans have experienced population growth, so has our community’s need for services and a voice in the policies that affect our everyday lives. Nearly one out every three Asians in New York State lives in or near poverty. Asian Americans also have the highest rates of limited English proficiency in New York City, with nearly 45% of all Asians and 72% of our seniors being LEP. Additionally, 63% of Asian residents in the state are foreign-born, with 90% of Asian children living with at least one immigrant parent. Now more than ever, we recognize the urgency of our longstanding commitment to ensuring that the immigrants who power our city receive the support they need to thrive.

We have been thankful to have recently received new initiative funding for legal services. Many of our members are TPS holders, of mixed family status, who are forced to navigate a terrorizing, opaque immigration system that puts them at risk for deportation and detention. Since 2015, we have been the only organization in the country providing TPS related-support to the Nepali community. In a year, we provide support to an estimated 1,500 TPS holders, a majority of whom live in NYC. Many depended on TPS for their work authorizations, their health insurance, business licenses, home mortgages, travel documents, etc. TPS for Nepali Nationals was terminated this year on Aug 20 by the Trump administration leaving hundreds of thousands of lives in a precarious situation. Our work in advancing immigration justice responds directly to these types of challenges by providing culturally competent case support to our at-risk members, particularly at the intersection of immigration and workers rights.

Arrests of immigrants from Asian countries, including China, Bangladesh, Nepal, and India, have increased significantly compared to last year. According to a new analysis by THE CITY, which examined federal records from the Deportation Data Project, there has been a 1,044% rise in arrests of Chinese immigrants and a 1,000% increase in arrests of Bangladeshi immigrants from 2024 to 2025.¹ In New York State, 24% of unauthorized immigrants are from Asia, and one in seven undocumented immigrants is Asian. These immigrants will now face a mandatory \$5,000 fee for failure to appear at court hearings. Asians are also the largest group of new green card holders in the last decade and now face high fees of \$1,500 to adjust their green card status and \$1,050 waivers of inadmissibility fees. In 2014, Asians were the largest refugee and asylum populations among all immigrants in the U.S.² Immigrants who have fled danger and have limited resources will now face steep costs: \$1,000 for asylum, \$100 in annual fees for pending cases, \$550 for work permits, and \$900 to appeal or file motions.

These numbers are nuanced in the sense that while a severe increase in fees/arrests results in an increased need for immigration legal services, immigrants are also in fear of even seeking out these services. Fear of ICE prevents community members from using city services, seeking medical care, reporting crime, and even going to their own workplaces. From long-term residents who have not adjusted their status, refugees, asylum seekers, individuals with Temporary Protected Status (TPS), special visas, and immigrant families, regardless of when they arrived in the US, our communities are on high alert. It has effectively instilled fear among our communities, making them less likely to engage in essential services. This is where our Community-Based Organizations (CBOs) play a vital role in building community trust and bridging cultural and linguistic barriers that mainstream organizations are unable to provide.

The RISE Network's Immigration Services and Advocacy

¹ Chu, H., & Hogan, G. (2025, July 14). NYC Immigration Arrests Just Shot Through the Roof, New Data Shows. THE CITY - NYC News. https://www.thecity.nyc/2025/07/14/ice-migrant-arrests-trump-administration-deportations-data/?utm_medium=email&utm_campaign=SCOOP%2007142025&utm_source=ActiveCampaign

² Guicheng "Ariel" Tan and Zora Haque (May 2024). Understanding and Supporting Asian Immigrant Students and Families, Harvard Graduate School of Education, Educator Brief Volume 2/Number 4 available at: immigrationinitiative.harvard.edu/wp-content/uploads/2024/05/MAY-2024_Understanding-and-Supporting-Asian-Immigrant-Students-and-Families-FINAL.pdf



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For FY25, we accompanied 200+ new cases related to labor trafficking, immigration bonds, ICE case support, general immigration, fraud, and wage; a process that involves one-on-one case management, interpretation, and community support. We work alongside various legal service providers like TakeRoots Justice, Legal Aid Society, and City Bar to provide pro-bono legal support for our members. In addition to legal support, we have conducted 4 KYRs, safety planning workshops as well as 7 legal info-sessions for change of status or adjustment of status to hundreds of our community members. The need for legal services has increased exponentially, and we have only been able to focus on the most vulnerable cases due to limited capacity of legal organizations across NYC. Many of our members are forced to pay money to for-profit lawyers, without guarantee of fair or quality service.

This year, we joined the RISE Network in advocating to resource our CBOs to respond quickly and effectively to the immigration challenges facing vulnerable Asian New Yorkers. Our CBOs are especially vital during these unprecedented times as successful immigration services require deep community involvement and linguistic competency. Funding Asian-leading and -serving CBOs directly is an effective way to provide immediate immigration support to the Asian community. Past funding for AAF's rapid response network in 2016-2020 allowed our network to serve 8,090 Asian New Yorkers with services ranging from intakes to consultations; representation on various cases; assistance with citizenship, green card, DACA, family petition, and U/T visa applications; to case management to access immigration legal services; and Know Your Rights trainings. AAF's network of CBOs provided this wide range of services throughout New York City to the Arab, Cambodian, Chinese, Bangladeshi, Filipino, Indian, Indo-Caribbean, Japanese, Korean, Nepali, Pakistani, and Vietnamese communities in over 12 languages.

Recommendations

We thank the Committee on Immigration for its continued support and leadership in protecting immigrant New Yorkers. We make the following recommendations to City Council to sustain and support our work:

Protect and expand funding for CBOs providing immigration legal services and case management for AAPI communities.

- Protect and expand funding for the following initiatives included in the City Council's September Transparency Resolution: Legal Services for AAPI Communities; Legal Services for Day Laborers & Domestic Workers; and the Immigration Legal Services for Survivors of Violence and Gender Based Harm.
- Expand investment in language-accessible legal services to include and prioritize case management as our CBOs act as a critical bridge, providing wrap-around case management when making referrals to legal services.
- Continue supporting the coordination of immigration rapid response networks to connect immigrants and their families with critical legal services, case management, and accurate resources to address a rise in misinformation, isolation, and fear.

Streamline communication with the AAPI RISE Network.

- Work with the RISE Network – made up of nearly 20 Asian-led and -serving organizations providing immigration case management and legal services – to establish clear lines of communication so our CBOs have an established, regular opportunity to share how immigration enforcement is impacting the AAPI community.

Prioritize supporting small- and mid-sized CBOs serving emerging immigrant communities.



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- Our CBOs are trusted partners with deep relationships with vulnerable community members who are less likely to interact with mainstream organizations and government systems in this current environment.

Prioritize addressing contracting issues that pose barriers for CBOs to promptly receive funding to deliver crucial services.

- We applaud the City Council's efforts to improve contracting processes for our CBOs. We ask that the City Council continue holding the Mayoral administration accountable for streamlining the contracting and procurement process of culturally-competent safety net programs to ensure CBOs receive funding promptly to deliver crucial services.

Continue calling on the New York State Legislature to pass the New York for All Act.

- The New York for All Act would prohibit and regulate the discovery and disclosure of immigration status by New York state and local government entities. As immigrant New Yorkers face heightened threats, we must prevent local and state law enforcement and agencies from diverting resources to the federal deportation agenda and sharing sensitive information with federal immigration authorities.

Conclusion

We must do more to protect the well-being and safety of Asian New Yorkers, especially Asian immigrants. CBOs have the proven skills and expertise to provide specialized culturally and linguistically competent immigrant legal services our communities need; however, only with adequate funding and investment can we address these challenges. Thank you for allowing us to testify and we look forward to working with you to make sure our immigrant communities get the support they deserve.

Committee on Immigration
“Oversight-Legal Services for Immigrant New Yorkers”

Testimony from African Communities Together
October 28, 2025

Good morning Chair Aviles and members of the Committee on Immigration. Thank you for holding today's important hearing on “Legal Services for Immigrant New Yorkers”.

My name is Airenakhue B. Omoragbon. I am the daughter of immigrants from Trinidad and Nigeria, and I serve as the New York Policy Manager at African Communities Together. In this capacity, I drive our Right to Shelter, Hair Braiding, and Language Access campaigns, and I also work full-time on the Language Justice Collaborative (LJC) to eliminate language and cultural barriers to immigrants' access to public services.

Since launching as an organization, ACT has built a base of tens of thousands of African immigrant contacts, connected thousands of African immigrants to direct services, and championed successful legal cases on behalf of low-income and working-class African immigrants living in New York. The members of our New York Chapter hail from countries like Ethiopia, Sudan, Liberia, Mali, and the Ivory Coast and we strongly align with other Black-led organizations and communities, as part of the broader immigrant rights movement.

Located in Harlem, ACT's New York Chapter provides hundreds of immigrants with free, high-quality immigration legal services, including but not limited to assistance with applications for naturalization (N400), employment authorization (I-765), Temporary Protected Status (I-821), and consideration for Deferred Action for Childhood Arrivals (DACA) status (I-821 D).

What makes our provision of legal services outstanding, lies in our expertise around language access, the diversity of our staff, and our ability to create a safe space for immigrants who had no choice but to flee their country due to heinous persecution. For example, over 90% of our full-time and part-time staff are either African immigrants or the children of African immigrants, and among staff alone we have the capacity to serve clients that speak over a dozen African languages, including but not limited to French, Wolof, Amharic, Oromo, Yoruba, and Fulani. This does not even include the services we provide via AfriLingual.

From January 2025 to present, New York City has seen a horrendous increase in immigration enforcement activity. Just last week, nine African immigrants were kidnapped on Canal Street, as part of a federal raid targeting street vendors in Lower Manhattan. Studies show that the current federal administration is prioritizing the estimated 14 million undocumented immigrants for deportation, despite many having temporary deportation status. Of the 60,000 immigrants that have been unlawfully held in ICE detention centers, local jails, military bases, hotels, airports, and hospitals since September 2025, 72% of them have no criminal convictions.

In listening to accounts like these, I think it is very easy to feel absolutely hopeless and just want to give up. But from ACT's perspective, now is the time, more than ever, to not only increase New York immigrants' access to legal representation, but also ensure that Black-led organizations serving immigrants from West Africa, the Caribbean, Latin America, and parts of the African Diaspora are prioritized in that reform.

The only way for an immigrant to fight deportation here in New York City, is to hire a lawyer that is committed to fighting for their rights and equipped to successfully represent them in court. But for many Black immigrants, there is a strong pipeline between anti-Black policing, criminalization, mass incarceration, and deportation, that is only sped up by barriers to language access, anti-Black, and anti-immigrant sentiments.

Organizations like ACT are a lifeline for Black immigrants and their only chance at fighting deportation because we empathize with them on the injustice they are facing, speak many of their languages, and understand that for many, returning home via deportation is worse than death.

In the past, ACT has received legal funding through Action NYC and the Pro Se Plus Project (PSPP). This has enabled us to assist asylum seekers navigating the legal process without full representation, empowering them to move forward in their cases with confidence and clarity. However, this year we received one-year worth of funding, with no chance of renewal. ACT is so grateful to the City Council because you stepped in and provided organizations like ACT with an additional 500,000 to continue this much needed work.

Even though the numbers of new arrivals has sharply diminished, most of these recent arrivals still have pending immigration matters. We ask that you continue to prioritize legal services for Immigrant New Yorkers, so we can bring pro se asylum seekers and SIJS applicants, many of which filed their initial applications with the City's Asylum Application Help Center, successfully to the conclusion of their case.

Thank You.

Submitted by:
Airenakhue B. Omoragbon, MSSW, LMSW
NY Policy Manager
African Communities Together

Testimony to the New York City Council
Committee on Immigration
October 28, 2025

Introduction

Thank you, Chair Alexa Avilés, and members of the Committee on Immigration for holding this hearing and for providing us with the opportunity to testify. My name is Navdeep Bains, Associate Director of Advocacy & Policy at the Asian American Federation (AAF), where we proudly represent the collective voice of more than 70 member organizations serving 1.5 million Asian New Yorkers. I'm honored to testify alongside our partners of the Rapid Immigration Support and Empowerment (RISE) Network – a network of nearly 20 Asian-led and Asian-serving organizations providing immigration case management and legal services support to New Yorkers.

As Asian Americans have experienced population growth, so has our community's need for services and a voice in the policies that affect our everyday lives. Nearly one out every three Asians in New York State lives in or near poverty. Asian Americans also have the highest rates of limited English proficiency in New York City, with nearly 45% of all Asians and 72% of our seniors being LEP. Additionally, 63% of Asian residents in the state are foreign-born, with 90% of Asian children living with at least one immigrant parent. Now more than ever, we recognize the urgency of our longstanding commitment to ensuring that the immigrants who power our city receive the support they need to thrive.

Current Immigration Legal Landscape for Asian New Yorkers

The current presidential administration has brought drastic policy changes at the federal, state, and local levels. Policy changes impacting our Asian communities in New York City include H.R. 1. This piece of legislation delivers tax cuts to the wealthiest Americans while boosting the detention budget of Immigration and Customs Enforcement (ICE) by 308%, raising the risk of sudden arrests, workplace raids, and family separations – even for long-time residents. Over \$75 billion will be allocated through 2029 to ICE, which can have severe consequences for Asian American New Yorkers' safety, stability, and dignity. AAF recently did an analysis on the increasing barriers to citizenship that H.R. 1 presents to Asian American immigrants and mixed-status families.¹

Arrests of immigrants from Asian countries, including China, Bangladesh, Nepal, and India, have increased significantly compared to last year. According to a new analysis by THE CITY, which examined federal records from the Deportation Data Project, there has been a 1,044% rise in arrests of Chinese immigrants and a 1,000% increase in arrests of Bangladeshi immigrants from 2024 to 2025.² In New York State, 24% of unauthorized immigrants are from Asia, and one in seven undocumented immigrants is Asian. These immigrants will now face a mandatory \$5,000 fee for failure to appear at court hearings. Asians are also the largest group of new green

¹ Asian American Federation. (2025). How H.R. 1 Threatens the Health and Wellbeing of Asian American New Yorkers. <https://www.aafederation.org/wp-content/uploads/2025/08/Asian-American-Federation-H.R.-1-Info-Sheet.pdf>

² Chu, H., & Hogan, G. (2025, July 14). NYC Immigration Arrests Just Shot Through the Roof, New Data Shows. THE CITY - NYC News. <https://www.thecity.nyc/2025/07/14/ice-migrant-arrests-trump-administration-deportations-data/>



Asian American Federation

card holders in the last decade and now face high fees of \$1,500 to adjust their green card status and \$1,050 waivers of inadmissibility fees. In 2014, Asians were the largest refugee and asylum populations among all immigrants in the U.S.³ Immigrants who have fled danger and have limited resources will now face steep costs: \$1,000 for asylum, \$100 in annual fees for pending cases, \$550 for work permits, and \$900 to appeal or file motions.

These numbers are nuanced in the sense that while a severe increase in fees/arrests results in an increased need for immigration legal services, immigrants are also in fear of even seeking out these services. Fear of ICE prevents community members from using city services, seeking medical care, reporting crime, and even going to their own workplaces. ICE's brute and indiscriminate tactics have shattered families, instilled fear, and prevented New Yorkers from accessing essential services, such as law enforcement, public benefits, healthcare, and education. From long-term residents who have not adjusted their status, refugees, asylum seekers, individuals with Temporary Protected Status (TPS), special visas, and immigrant families, regardless of when they arrived in the US, our communities are on high alert. It has effectively instilled fear among our communities, making them less likely to engage in essential services. This is where our Community-Based Organizations (CBOs) play a vital role in building community trust and bridging cultural and linguistic barriers that mainstream organizations are unable to provide.

The RISE Network's Immigration Services and Advocacy

This year, AAF advocated to resource and equip our RISE Network to respond quickly and effectively to the immigration challenges facing vulnerable Asian New Yorkers. Doing the on-the-ground work takes an enormous amount of effort from our CBOs who are immensely trusted within our communities. Our CBOs are especially vital during these unprecedented times as successful immigration services require deep community involvement and linguistic competency. However, these CBOs are often not integrated into mainstream systems and processes, leaving Asian American communities isolated from the information and services they need to navigate the impact of policy changes.

Earlier this year, AAF surveyed our member organizations to see which immigrant communities they serve, what gaps exist, and what their needs are in terms of providing immigration-related services. Only 5.6% of our member organizations said they had capacity to take on additional immigration related cases while the majority reported being under-resourced to meet the growing demand. Support from external immigration services was also bleak as our CBOs reported that the mainstream organizations they would normally refer clients to were stretched thin and either had long wait lists or were not accepting clients due to strained capacity.

³ Guicheng "Ariel" Tan and Zora Haque (May 2024). Understanding and Supporting Asian Immigrant Students and Families, Harvard Graduate School of Education, Educator Brief Volume 2/Number 4 available at: immigrationinitiative.harvard.edu/wp-content/uploads/2024/05/MAY-2024_Understanding-and-Supporting-Asian-Immigrant-Students-and-Families-FINAL.pdf.



Asian American Federation

Funding Asian leading and serving CBOs directly is an effective way to provide immediate immigration support to the Asian community. Past funding for AAF's rapid response program in 2016-2020 allowed AAF and our network to serve 8,090 Asian New Yorkers with services ranging from intakes to consultations; representation on various cases; assistance with citizenship, green card, DACA, family petition, and U/T visa applications; case management to access immigration legal services; and Know Your Rights trainings. AAF's network of CBOs provided this wide range of services throughout New York City to the Arab, Cambodian, Chinese, Bangladeshi, Filipino, Indian, Indo-Caribbean, Japanese, Korean, Nepali, Pakistani, and Vietnamese communities in over 12 languages.

Asian CBOs facing funding cuts and political threats are already spread thin, doing our best with limited resources to share information, calm anxieties, and provide help in multiple languages. This critical work has just begun as we have seen from last week's ICE raid in Chinatown targeting New Yorkers and immigrants.⁴ We are incredibly grateful for the FY 26 City Council funding provided to AAF and our RISE Network partners to support in-language, culturally competent immigration legal services and case management. However, while Asian non-citizens make up nearly 30% of New York City's non-citizen population,⁵ our network of Asian CBOs only received 3.9% of the additional \$50 million City Council invested in immigration legal services funding this year. We applaud the record breaking investment in legal services funding and urge the City Council to increase its investment in Asian CBOs in FY 27 to address these gaps and meet the needs of immigrants who are under threat.

Recommendations

We thank the Committee on Immigration for its continued support and leadership in protecting immigrant New Yorkers. We make the following recommendations to City Council to sustain and support our work:

Protect and expand funding for CBOs providing immigration legal services and case management for AAPI communities.

- Protect and expand funding for the following initiatives included in the City Council's September Transparency Resolution: Legal Services for AAPI Communities; Legal Services for Day Laborers & Domestic Workers; and the Immigration Legal Services for Survivors of Violence and Gender Based Harm.
- Expand investment in language-accessible legal services to include and prioritize case management as our CBOs act as a critical bridge, providing wrap-around case management when making referrals to legal services.
- Continue supporting AAF's coordination of an immigration rapid response network to connect immigrants and their families with critical legal services, case management, community education, and accurate resources to address a rise in misinformation, isolation, and fear.

⁴ See Statement from Asian American Federation on ICE Raids in Manhattan's Chinatown (October 23, 2025) published here: <https://www.aafederation.org/statement-from-asian-american-federation-on-tuesdays-ice-raids-in-manhattans-chinatown/>

⁵ AAF's internal analysis of 2023 ACS PUMS data.



Asian American Federation

Streamline communication with the AAPI RISE Network.

- Work with the RISE Network – made up of nearly 20 Asian-led and -serving organizations providing immigration case management and legal services – to establish clear lines of communication so our CBOs have an established, regular opportunity to share how immigration enforcement is impacting the AAPI community.

Prioritize supporting small- and mid-sized CBOs serving emerging immigrant communities.

- Our CBOs are trusted partners with deep relationships with vulnerable community members who are less likely to interact with mainstream organizations and government systems in this current environment. Under current structures, these CBOs are not integrated into the planning process, leaving Asian American communities isolated from the information and services they need to navigate the impact of policy changes.

Prioritize addressing contracting issues that pose barriers for CBOs to promptly receive funding to deliver crucial services.

- We applaud City Council Speaker Adams' efforts to improve contracting processes for our CBOs and we ask that City Council continue holding the Mayoral administration accountable for streamlining the contracting and procurement process of culturally-competent safety net programs to ensure CBOs receive funding promptly to deliver crucial services.

Continue calling on the New York State Legislature to pass the New York for All Act.

- The New York for All Act would prohibit and regulate the discovery and disclosure of immigration status by New York state and local government entities. As immigrant New Yorkers face heightened threats, we must prevent local and state law enforcement and agencies from diverting resources to the federal deportation agenda and sharing sensitive information with federal immigration authorities.

Conclusion

We must do more to protect the well-being and safety of Asian New Yorkers, especially Asian immigrants. CBOs have the proven skills and expertise to provide specialized culturally and linguistically competent immigrant legal services our communities need; however, only with adequate funding and investment can they address these challenges. We at the Asian American Federation thank you for allowing us to testify and look forward to working with you to make sure our immigrant communities get the support they deserve. If you have any questions, you can contact me by email at navdeep.bains@aafederation.org or by phone at (212) 344-5947.



**Testimony of Jane Shim
Director, Anti-Asian Violence
Asian American Legal Defense and Education Fund**

Before the New York City Council Committee on Immigration

**Oversight Hearing on Legal Services for Immigrant New Yorkers
October 28, 2025**

Chair Avilés and Members of the Committee,

My name is Jane Shim, and I am the Director of the Anti-Asian Violence program at the Asian American Legal Defense and Education Fund (AALDEF). I submit this testimony on AALDEF's behalf and thank the committee for the opportunity to testify.

AALDEF is a national legal organization, headquartered in New York City, that protects and promotes the civil rights of Asian Americans through litigation, advocacy, education, and organizing. AALDEF was founded more than 50 years ago by Asian American law students and activists who recognized that Chinatown residents did not have the same access to legal services as other communities.

Throughout our fifty years, AALDEF has worked with Asian immigrants to provide direct legal services, immigration clinics, community education, and systemic advocacy. Through this work, we have observed that the same gaps that drove our founding have only grown more urgent. We have a forthcoming report about the invisible, unmet need for legal services among Asian immigrants. Our testimony today draws from that research to highlight gaps in legal services for Asian New Yorkers and our recommendations on how to address them.

Background

In the past fifty years, the Asian American population in the United States has multiplied exponentially—from just over 1.5 million to nearly 25 million Asian Americans nationwide.¹ Yet, the Legal Services Corporation, the nation's largest funder of civil legal aid for low-income individuals, recently reported that only 2.8% of its clients identified as Asians and Pacific Islanders, and a mere 1.3% speak an Asian or Pacific Islander language.²

The same is true in New York: Asians are the fastest growing demographic in New York

¹ <https://www.pewresearch.org/short-reads/2025/05/01/key-facts-about-asians-in-the-us/>

² <https://www.lsc.gov/our-impact/publications/numbers>

City, making up 17.3% of the population³ and over a quarter of the city's 3 million immigrants.⁴ The city's Asian population is remarkably diverse, encompassing more than 30 different ethnic groups and over 50 languages.⁵ Nearly seven in ten Asian New Yorkers are foreign-born.⁶

U.S. immigration law is deeply intertwined with anti-Asian racism, from the Chinese Exclusion Act to the post-9/11 creation of Immigration and Customs Enforcement (ICE), which institutionalized a racialized system of surveillance that disproportionately targeted Muslim, South Asian, and Arab communities under the guise of national security.

Despite New York City's reputation as one of the best-resourced jurisdictions for immigration representation, Asian immigrants remain persistently at the margins. They constitute 25% of the city's undocumented population and a substantial share of those facing deportation. For example, Chinese immigrants are the second largest undocumented group and are the single largest nationality in removal proceedings.⁷ Although Asian people are largely portrayed as economically successful, approximately 1 in 4 Asian New Yorkers live in poverty, nearly double the rate of white New Yorkers.⁸

Gaps in Legal Services for Asian Immigrant New Yorkers

RISE Network funding enables us to provide legal support and representation with our community partners. But much more is still needed. Through our work and conversations with our clients, legal service providers, and community-based organizations ("CBOs"), we have identified the following barriers to legal services for Asian immigrants in New York City:

1. Language Access Gaps: According to 2020 Census data, nearly 6 out of 10 New Yorkers who speak an Asian language have limited English proficiency ("LEP").⁹ Yet many legal service provider hotlines do not offer an Asian language option, so Asian clients are shut out from the start. If they do make their way in, few legal service providers employ Asian language speakers. Instead, they use commercial interpretation vendors that are both costly and insufficient to build client trust.
2. Legal Service Provider Capacity Gaps: Heavy caseloads limit legal service providers from doing outreach, leaving many Asian immigrants unaware that free

³ <https://www.aafederation.org/research/state-of-change-asian-populations-transform-new-york/>

⁴ Mayor's Office of Immigrant Affairs, A Demographic Snapshot: NYC's Asian and Pacific Islander (API) Immigrant Population at 3, <https://www1.nyc.gov/assets/immigrants/downloads/pdf/Fact-Sheet-NYCs-API-Immigrant-Population.pdf>.

⁵ <https://www.nyc.gov/assets/immigrants/downloads/pdf/Fact-Sheet-NYCs-API-Immigrant-Population.pdf>

⁶ *Health of Asians and Pacific Islanders in New York City* at 10, NYC Health (2021), <https://www.nyc.gov/assets/doh/downloads/pdf/episrv/asian-pacific-islander-health-2021.pdf>.

⁷ "New Proceedings Filed in Immigration Court," *Transactional Records Access Clearinghouse (TRAC)*, <https://tracreports.org/phptools/immigration/ntanew/>. (last visited May 21, 2025).

⁸ Poverty Tracker Research Group at Columbia University. Portrait of Disadvantage Among Asian American New Yorkers. Accessed May 22, 2025. https://robinhood.org/wp-content/uploads/2024/05/PT_portrait_AAPI_5.20.24.pdf

⁹ Asian American Federation, *Asian Languages in New York City* (Jul. 30, 2022), <https://www.aafederation.org/research/asian-languages-in-new-york-city/>

representation is even available. When our community members do contact legal service providers, attorneys are deterred from accepting our cases due to limited experience with legal theories and materials specific to Asian countries. The service gap becomes self-perpetuating, and our communities remain underrepresented.

3. Funding Gaps: City funding prioritizes high-volume legal service providers, leaving smaller Asian immigrant-serving programs and organizations underfunded. Yet these larger organizations do not have the resources to conduct outreach or provide access to Asian communities. While many legal service providers understand that more is needed to serve Asian immigrant communities, they cannot document or prove the demand for this work. Smaller organizations are currently best positioned to conduct the necessary in-language and culturally competent outreach necessary to bring our communities into the fold and should receive the funding to do so.

In the absence of visible, culturally and linguistically accessible nonprofit legal services, community members instead rely on word-of-mouth referrals for private attorneys. Many of these low-income New Yorkers are charged high upfront costs, and some predatory attorneys threaten to stop working on their cases without additional payments. Some private attorneys provide quality representation, but others do bad work or no work altogether.

Recommendations to Help Close These Gaps

We recommend targeted funding to help close this gap. Our communities need:

1. Increased funding to legal service providers for targeted outreach to underserved Asian communities; competent Asian interpretation for their hotlines; and bilingual Asian-language legal staff.
2. Direct funding to CBOs to support infrastructure, outreach, capacity-building, and to provide interpretation services for LSP partnerships.

Conclusion

Asian immigrants are underrepresented in New York City's legal services system not because of low need, but because of policy choices, funding structures, and institutional barriers that must change. There is an urgent need to transform New York City's expansive but inequitable legal service network to ensure Asian immigrants are no longer left at the margins.

Thank you again for your attention to ensuring that immigrant New Yorkers have access to the culturally and linguistically competent immigration legal services our communities need.

October 26, 2025
Re: RISE Network

**Testimony to the New York City Council
Committee on Immigration
October 28, 2025**

To:
Councilmember Alexa Aviles, Chair
Committee on Immigration Members

Thank you, Chair Alexa Avilés, and members of the Committee on Immigration, for holding this hearing and for providing us the opportunity to testify. My name is Thomas Yu, Executive Director at Asian Americans For Equality (AAFE), a 52-year-old non-profit community development organization providing social services, affordable housing development, small business & homeownership technical assistance and lending, tenant organizing, advocacy and urban planning for AAPI and all New Yorkers in need throughout the 5 boroughs. We are here today testifying alongside our partners from the Rapid Immigration Support and Empowerment (RISE) Network— a network of nearly 20 Asian-led and Asian-serving organizations providing immigration case management and legal services support to New Yorkers.

As Asian Americans have experienced population growth, so has our community’s need for services and a voice in the policies that affect our everyday lives. Nearly one out every three Asians in New York State lives in or near poverty. Asian Americans also have the highest rates of limited English proficiency in New York City, with nearly 45% of all Asians and 72% of our seniors being LEP. Additionally, 63% of Asian residents in the state are foreign-born, with 90% of Asian children living with at least one immigrant parent. Now more than ever, we recognize the urgency of our longstanding commitment to ensuring that the immigrants who power our city receive the support they need to thrive.

Arrests of immigrants from Asian countries, including China, Bangladesh, Nepal, and India, have increased significantly compared to last year. According to a new analysis by THE CITY, which examined federal records from the Deportation Data Project, there has been a 1,044% rise in arrests of Chinese immigrants and a 1,000% increase in arrests of Bangladeshi immigrants from 2024 to 2025.¹ In New York State, 24% of unauthorized immigrants are from Asia, and one in seven undocumented immigrants is Asian. These immigrants will now face a mandatory \$5,000 fee for failure to appear at court hearings. Asians are also the largest group of new green card holders in the last decade and now face high fees of \$1,500 to adjust their green card status and \$1,050 waivers of inadmissibility fees. In 2014, Asians were the largest refugee and asylum populations among all immigrants in the U.S.²

¹ Chu, H., & Hogan, G. (2025, July 14). NYC Immigration Arrests Just Shot Through the Roof, New Data Shows. THE CITY - NYC News. https://www.thecity.nyc/2025/07/14/ice-migrant-arrests-trump-administration-deportations-data/?utm_medium=email&utm_campaign=SCOOP%2007142025&utm_source=ActiveCampaign

² Guicheng “Ariel” Tan and Zora Haque (May 2024). Understanding and Supporting Asian Immigrant Students and Families, Harvard Graduate School of Education, Educator Brief Volume 2/Number 4 available at: immigrationinitiative.harvard.edu/wp-content/uploads/2024/05/MAY-2024_Understanding-and-Supporting-Asian-Immigrant-Students-and-Families-FINAL.pdf.

Immigrants who have fled danger and have limited resources will now face steep costs: \$1,000 for asylum, \$100 in annual fees for pending cases, \$550 for work permits, and \$900 to appeal or file motions.

These numbers are nuanced in the sense that while a severe increase in fees/arrests results in an increased need for immigration legal services, immigrants are also in fear of even seeking out these services. Fear of ICE prevents community members from using city services, seeking medical care, reporting crime, and even going to their own workplaces. From long-term residents who have not adjusted their status, refugees, asylum seekers, individuals with Temporary Protected Status (TPS), special visas, and immigrant families, regardless of when they arrived in the US, our communities are on high alert. It has effectively instilled fear among our communities, making them less likely to engage in essential services. This is where our Community-Based Organizations (CBOs) play a vital role in building community trust and bridging cultural and linguistic barriers that mainstream organizations are unable to provide.

This year, we joined the RISE Network in advocating to resource our CBOs to respond quickly and effectively to the immigration challenges facing vulnerable Asian New Yorkers. Our CBOs are especially vital during these unprecedented times as successful immigration services require deep community involvement and linguistic competency. Funding Asian-leading and -serving CBOs directly is an effective way to provide immediate immigration support to the Asian community. Past funding for AAF's rapid response network in 2016-2020 allowed our network to serve 8,090 Asian New Yorkers with services ranging from intakes to consultations; representation on various cases; assistance with citizenship, green card, DACA, family petition, and U/T visa applications; to case management to access immigration legal services; and Know Your Rights trainings. AAF's network of CBOs provided this wide range of services throughout New York City to the Arab, Cambodian, Chinese, Bangladeshi, Filipino, Indian, Indo-Caribbean, Japanese, Korean, Nepali, Pakistani, and Vietnamese communities in over 12 languages.

We thank the Committee on Immigration for its continued support and leadership in protecting immigrant New Yorkers. We make the following recommendations to City Council to sustain and support our work:

Protect and expand funding for CBOs providing immigration legal services and case management for AAPI communities.

- Protect and expand funding for the following initiatives included in the City Council's September Transparency Resolution: Legal Services for AAPI Communities; Legal Services for Day Laborers & Domestic Workers; and the Immigration Legal Services for Survivors of Violence and Gender Based Harm.
-

- Expand investment in language-accessible legal services to include and prioritize case management as our CBOs act as a critical bridge, providing wrap-around case management when making referrals to legal services.
- Continue supporting the coordination of immigration rapid response networks to connect immigrants and their families with critical legal services, case management, and accurate resources to address a rise in misinformation, isolation, and fear.

Streamline communication with the AAPI RISE Network.

- Work with the RISE Network – made up of nearly 20 Asian-led and -serving organizations providing immigration case management and legal services – to establish clear lines of communication so our CBOs have an established, regular opportunity to share how immigration enforcement is impacting the AAPI community.

Prioritize supporting small- and mid-sized CBOs serving emerging immigrant communities.

- Our CBOs are trusted partners with deep relationships with vulnerable community members who are less likely to interact with mainstream organizations and government systems in this current environment.

Prioritize addressing contracting issues that pose barriers for CBOs to promptly receive funding to deliver crucial services.

- We applaud the City Council's efforts to improve contracting processes for our CBOs. We ask that the City Council continue holding the Mayoral administration accountable for streamlining the contracting and procurement process of culturally-competent safety net programs to ensure CBOs receive funding promptly to deliver crucial services.

Continue calling on the New York State Legislature to pass the New York for All Act.

- The New York for All Act would prohibit and regulate the discovery and disclosure of immigration status by New York state and local government entities. As immigrant New Yorkers face heightened threats, we must prevent local and state law enforcement and agencies from diverting resources to the federal deportation agenda and sharing sensitive information with federal immigration authorities.

Thank you for your attention and leadership.

Sincerely,



Thomas Yu, Executive Director
Thomas_yu@aafe.org
 AAFE



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TESTIMONY OF:

Shawn Blumberg, Associate Director

Immigrant Community Action Project

BROOKLYN DEFENDER SERVICES

Testimony before New York City Council

Committee on Immigration

**Oversight Hearing on Legal Services for Immigrant New
Yorkers**

October 28, 2025

My name is Shawn Blumberg, and I am Associate Director of the Immigration Community Action Project (ICAP) at Brooklyn Defender Services. Brooklyn Defender Services (BDS) is a public defense office whose mission is to provide outstanding representation and advocacy free of cost to people facing loss of freedom, family separation and other serious legal harms by the government. We are grateful to the Committee on Immigration and Chair Avilés for the ongoing commitment to providing legal services to immigrant New Yorkers.

For nearly 30 years, BDS has worked, in and out of court, to protect and uphold the rights of individuals and to change laws and systems that perpetuate injustice and inequality. After 29 years of serving Brooklyn, we expanded our criminal defense services in Queens. We are proud to bring the same dedication and excellence to Queens. Our staff consists of specialized attorneys, social workers, investigators, paralegals, and administrative staff who are experts in their individual fields. BDS also provides a wide range of additional services for the people we represent by providing civil legal advocacy, assistance with educational issues, housing and public benefits advocacy.

BDS' Immigration Practice protects the rights of immigrant New Yorkers by defending against Immigration and Customs Enforcement (ICE) detention and deportation, minimizing the negative immigration consequences of criminal and family charges for non-citizens, and representing immigrants in applications for immigration benefits. We represent people who are applying for immigration relief before U.S. Citizenship and Immigration Services (USCIS) and

in removal proceedings in New York's immigration courts. Our *Padilla* team attorneys are criminal-immigration specialists who provide support and expertise on thousands of cases, including advocacy regarding enforcement of New York City's detainer law, individualized immigration screenings, and legal consults. Along with the Bronx Defenders and The Legal Aid Society, BDS' New York Immigrant Family Unity Project (NYIFUP) team, the nation's first-ever publicly universal representation program for detained immigrants facing deportation, specializes in representing people who are detained while they await their deportation hearing. We also provide continued representation on immigration matters to our previously detained immigrant clients after securing their release from ICE custody.

Current Climate

The gravity of the situation for immigrants in New York City is almost beyond comprehension. Our neighbors are being snatched off the street by masked, plainclothes ICE agents, teenagers are being detained at the very courthouses they are visiting to do the right thing as part of our legal system, and due process is dangerously becoming a thing of the past. Just last week, we witnessed dozens of federal law enforcement descend on a streetcorner in Chinatown, steps from a state courthouse, and arrest street vendors. It is impossible to overstate the degree to which anxiety and terror have overcome the diverse communities where we live and work. Once bustling neighborhoods, parks, and playgrounds are eerily quiet. Our non-citizen family members, colleagues, clients, and neighbors are terrified of being violently arrested at court appearances, when dropping their kids at school, going to work, or grocery shopping. We are also hearing from citizens, permanent residents, and visa-holders who fear being swept up in raids, separated from their families, or harassed or taken by immigration enforcement agents.

The current need for expanded immigration legal services and legal education is enormous. Our office has experienced an increase in phone calls, emails, and walk-ins from community members who are terrified and seeking help. This is in addition to the hundreds of internal referrals from our family and criminal defense practices of existing clients and their families who are seeking immigration advice or representation. With our current level of funding and staffing, we have had to triage and provide advice and referrals in some cases and have been unable to provide the level of service our clients need in all cases. More funding would allow us to provide full representation in more cases.

Need for Expanded Immigration Legal Services

BDS is grateful to the Council for its investment in immigration legal services and for increasing available support at a time when New Yorkers need it most. Your commitment to sustaining programs like NYIFUP and Immigrant Opportunity Initiative (IOI) have a meaningful impact on our city's immigrant communities. Expanded funding for NYIFUP in the FY26 budget is a lifeline for those who have been detained and facing deportation. We also appreciate the new funding allocation for the School-Based Immigrant Rapid Response Legal Access initiative; we are excited to partner with DOE and Project Open Arms to work with immigrant families and their school-age children in need of immigration legal assistance and support.

The city has allocated an additional \$50 million to expand immigration legal services in the FY26 budget.¹ Based on our experience, and the hundreds of calls we have received for assistance, we see several gaps in services that the city can take steps to fund with this additional money. As the city determines where to invest additional funds for immigration legal services, we encourage you to fund services that are as flexible and agile as possible to respond to the changing needs among immigrant New Yorkers. The stakes in immigration cases have never been higher. Most immigration cases have become complex in that more immigrants today are facing the risk of deportation. Legal services for individuals must be coupled with investments in legal education to reach as many people as possible. It's critical that all New Yorkers, regardless of their immigration status, know their rights and the rights of their loved ones and community members.

The risks encountered by non-citizens seeking relief affirmatively before USCIS or in court have never been higher. It used to be relatively rare that people checking in with ICE in a wide variety of legal postures were detained. Now it is commonplace and happens even to people who have some forms of immigration relief granted or who otherwise would recently have been considered very low risk. People simply trying to appear in person in their own removal proceedings are detained constantly by ICE agents waiting in the hallways of 26 Federal Plaza. USCIS has new enforcement authority and a policy of placing as many non-citizens in removal proceedings as it can. Also, the risk of detention at what previously would have been low risk USCIS interviews has dramatically increased.

As a result of this hyper enforcement, we not only have more cases but often need to begin our representation much earlier. Asking for continuances *pro se* in immigration court is no longer straightforward or risk free for clients simply trying to follow the designated process. We need to do complicated screening and risk analyses at every stage of every encounter with Executive Office for Immigration Review (EOIR), USCIS, or ICE. For example, people with removal orders must make impossible decisions about whether to apply for relief for which they're eligible, with the hope of reopening their removal proceedings, knowing they could well be detained at their USCIS interviews. Immigrants with any arrest history, even without criminal convictions, face unprecedented risks of being placed in removal proceedings and/or detained as a result of applying for relief. People filing asylum applications in court must now submit more information earlier in their proceedings as judges are empowered and encouraged to pretermite, or summarily deny, their asylum applications without a hearing. Even applicants who overcome these additional barriers and heightened risk face additional financial burdens, and we are already seeing many clients who are unable to afford the \$100 annual fee to keep their asylum claim active.

Expand Full Legal Representation for Those at High Risk of Detention

Full representation is a critical tool to protect New Yorkers at high risk of detention. BDS specializes in working with people who have complex immigration cases, including criminal legal or family court system involvement. BDS' Immigrant Community Action Project (ICAP)

¹ New York City Council, New York City Council Votes to Adopt the Fiscal Year 2026 Budget, June 30, 2025, <https://council.nyc.gov/press/2025/06/30/2916/>

serves as first responders providing essential immigration legal support to New York immigrant communities in complex immigration matters in a rapidly changing legal landscape. Drawing upon the expertise of BDS' criminal, family, and civil legal practice areas, ICAP staff are uniquely qualified to represent immigrants that find themselves at the intersection of immigration, criminal, family court, and other legal systems. ICAP staff represent people in non-detained removal proceedings and assist with applications for immigration benefits, including asylum, U & T visas, Special Immigrant Juvenile Status (SIJ), and DACA renewals. BDS has the resources and expertise to provide a full range of full representation services necessary to ensure zealous representation in these matters, including preparing and filing agency and court forms, drafting and filing complaints, motions, and other briefs in courts and with administrative agencies, and representing their clients in hearings and trials on these issues.

We are experiencing an influx of new referrals from our criminal and family defense practices and, due to funding and staffing restraints, are not able to represent every client in need. Many affirmative immigration applications used to be considered straightforward, based on the evidence submitted with the application. Now, requests for evidence are more frequent, invasive, and time consuming. Due to the complex nature of the cases we work on, the people BDS represents are often at heightened risk for arrest by ICE. Further, as delays in USCIS processing immigration applications continue, immigrants with pending applications are left more vulnerable to ICE arrest and deportation.

Given BDS' depth of knowledge and experience, as well as our presence in Queens and Brooklyn, two of the most diverse boroughs in New York, we are a trusted resource in the community. With additional funding, we could efficiently hire and onboard immigration attorneys, DOJ accredited representatives, and social workers to meet the growing demand for immigration representation.

Invest in Existing Immigration Service Organizations

The existing immigration legal service providers in New York City are among the best in the nation. Our staff are all working at and over-capacity. Most organizations have month long wait lists to speak to an attorney. The range of legal assistance sought is wide: legal permanent residents and members of mixed status families are seeking to apply for citizenship; New Yorkers who received assistance to file *pro se* applications for asylum or other legal relief are being schedule for hearing dates in immigration court and need an attorney for full representation; naturalized citizens hearing misinformation from the media and federal officials are seeking advice.

Due to federal funding cuts, we have seen partner organizations in the city reduce their staffing. This has resulted in longer waiting lists for services across the city and reduced capacity for all sorts of organizations. We see complex applications coming through our internal referral system, but we do not have enough internal capacity to take on all of the additional cases while meeting the needs of our existing clients. While we seek to provide robust, brief advice and warm handoffs to partners, the capacity to accept new immigration clients across the city has reduced. More resources are needed to increase our capacity to provide immigration representation to the

people and families who are already represented by our other practice areas and seeking immigration support.

As a provider of legal services for the low-income New Yorkers, we often meet our clients when they are in crisis and facing financial and emotional hardship. Many of the non-citizens we represent have personal histories of complex trauma, both in the United States and before they arrived in this country. Many have been exposed to violence and persecution in their home country before experiencing criminalization, detention and prosecution in the United States. Others, vulnerable upon arrival in this country, have faced abuse in the United States before suffering in detention. For even the most resilient, these experiences are traumatizing and dehumanizing. In detention, people struggle to access even the most basic mental health services, medication, and counseling. For those living with severe mental illness, these experiences may cause re-traumatization and exacerbate mental health concerns.

Our interdisciplinary immigration team of attorneys, social workers, and support staff works diligently to help our clients navigate healthcare systems, access competent providers, and receive the treatment they need and deserve. As immigration cases pend for years and years, our staff remains available to support the people we represent in accessing benefits, services, and care. It is critical that funding for immigration legal services is flexible enough to support the many additional supportive services that organizations like BDS provide.

Investing in existing legal service organizations like Brooklyn Defenders—which has the experience, expertise, structures, and supervisors to onboard and expand staffing—is the quickest way for the city to expand access to critical legal services.

Expanding Access to Legal Information in Communities from Trusted Resources

NYC should continue to support and fund efforts directed at educating immigrant communities to understand their rights. Community education campaigns can be a powerful tool in combating fearmongering targeted at immigrant communities.

By providing accurate information about existing laws and individual's rights, public education efforts can help to counter misinformation. When individuals are educated about available legal protections and know their rights, they are less likely to succumb to fear and are more likely to feel prepared for an emergency.

BDS has the institutional knowledge and training materials to provide critically needed legal information to the communities we serve. BDS uses a combination of community-based outreach to service providers, partnerships with elected officials' constituent service teams, and a know-your-rights website, events and media campaigns to invite community participation in our services. With additional funding and capacity, we can provide targeted information to trusted community members—teachers, medical clinics, social workers, librarians—who are getting questions from the community members they serve. Additionally, our We Have Rights (www.wehaverights.us), our free immigrant empowerment video campaign is available online in eight languages.

Conclusion

Brooklyn Defenders is grateful to the Council for its continued leadership and support for immigrant New Yorkers. We are proud to be a trusted resource in the communities we serve. Unfortunately, at our current funding and staffing levels, we are unable to meet the demand for our immigration services. With additional funding to meet this demand, we are confident in our ability to quickly scale up to meet the urgent need.

If you have any questions about our testimony, please contact Anya Mukarji-Connolly, Managing Director of Policy & Advocacy at amukarjiconnolly@bds.org.



Testimony

New York City Council Committee on Immigration

Hearing on Oversight: Legal Services for Immigrant New Yorkers

Tuesday, October 28, 2025

Submitted by

Desireé C. Hernández Sánchez, Director of Legal Services

Immigrant and Refugee Services Division

Catholic Charities Community Services, Archdiocese of New York

Thank you for the opportunity to provide testimony today on behalf of Catholic Charities Community Services, Archdiocese of New York (CCCS), regarding the provision of legal services to immigrants in New York City. I am Desireé C. Hernández Sánchez, Director of Legal Services for the Immigrant and Refugee Services Division of CCCS. Today, I will share our agency's experiences with immigration legal services provided by the City, including successes, challenges, and areas for improvement based on our work.

CCCS has provided legal services to immigrant New Yorkers for more than 45 years and currently has a range of programs to address the diverse and complex needs of the City's immigrant communities; we provide legal consultations and advice, representation in affirmative and immigration court cases, individualized pro se case assistance, legal orientations, and pro bono case placement. We work closely in partnerships and coalitions with the City, other providers, and community-based organizations.

This year, CCCS experienced an unprecedented loss of federal funding for legal services; these cuts threatened the continuity and availability of legal representation and related services for thousands of vulnerable clients and other New Yorkers, as well as the livelihoods of highly trained and dedicated staff. The cuts and their impact have come at a time when the federal government has prioritized immigration enforcement and implemented policies that result in the indiscriminate arrest, detention, and removal of immigrants, including immigrant youth. CCCS is a trusted leader in protecting immigrants from unlawful enforcement actions.

While the number of new arrivals to New York City plummeted over the last year, the population of immigrant New Yorkers who lack legal representation and need even basic legal services remains extremely high and exceeds the capacity of nonprofit legal providers. Of all immigration court cases filed by New York City residents in the 90-day period that ended in August, less than 40% had legal representation. These unrepresented individuals are more vulnerable to federal arrest, detention, and removal than immigrants with attorneys. Although CCCS helps more than 1,500 unique New York City residents each month, prioritizing cases with deadlines or other urgent needs, we maintain waitlists of hundreds of people seeking consultations, with more people calling daily. We can only offer legal representation to a fraction of those we screen and who may qualify for legal relief.

Given the continued pressing need, we are grateful to New York City for its leadership in standing with immigrants and robustly funding legal services. In a time of deep instability for staff and clients alike, the City's support has mitigated the impacts of federal cuts and federal enforcement, and enabled us to expand our critical services for vulnerable immigrants in this extremely challenging time.

Impact of Eliminating Federal Programs

- The Immigration Court Helpdesk and Family Group Legal Orientation Program, federally funded programs through which CCCS provided legal services on-site in the New York immigration courts since 2016, were eliminated. In 2024, CCCS helped 591 individuals file cases for asylum, Temporary Protected Status, and other immigration relief in immigration court. We also provided 1,305 individual consultations for unrepresented New Yorkers. Given the scarcity of affordable representation, these services provided critical services to unrepresented New Yorkers in immigration proceedings.
- The Legal Orientation Program for Custodians provided vital information about immigration law, procedures, and remedies to adult sponsors to whom unaccompanied children (UC) were released, enabling them to make informed decisions and protect the children's rights. In 2024, through this program, CCCS provided legal orientations and related information to 7,700 adult custodians.
- The Unaccompanied Children's Program (UCP), a federally funded program at CCCS for more than 12 years, was partially terminated in March, potentially depriving 500 children, nearly all of them residents of New York City, of legal representation. UCP serves children in federal custody in facilities in NYC and the Hudson Valley, and those released in the NYC area. In 2024, we served 3,806 children with a range of legal services. Although the federal program has since been reactivated, the contract was only extended for one year, with the option of government termination every three months. This instability has made it extremely difficult to accept new clients for representation.

Legal Services Provided by New York City

In this time of deep crisis and need, New York City's commitment to immigrant New Yorkers has been critical for CCCS and other legal service providers. As a long-time partner with City Council, the Mayor's Office of Immigrant Affairs (MOIA), and City agencies, as well as numerous other legal providers and community-based organizations in providing services to the most in-need New Yorkers, CCCS is grateful for the City's steadfast support of and commitment to our work.

New York City funding has been vital to our ability to serve thousands of New York immigrants in this fiscal year while maintaining our high-quality services. The Council's and MOIA's new and expanded support for legal programming has enabled CCCS to avoid more extensive staff layoffs, retain institutional expertise, and ensure that thousands of immigrant New Yorkers will receive representation and other foundational legal support. The funding from the City has enabled us to serve individuals we might previously have helped through the terminated federal programs and other vulnerable and high-needs immigrants, including unaccompanied children, asylum seekers, survivors of violence, and families facing deportation and separation. The support has meant that families in immigration court did not lose their attorneys midway through complex proceedings, and that children appearing before immigration judges will not do so alone.

We also are grateful to the City for partnering with CCCS and other expert legal service providers in designing impactful and responsive legal programming, to ensure that the best services are being provided in the most effective way. We continue to provide high-quality legal consultations to advise immigrants of their immigration legal relief and options available. We provide Know Your Rights presentation and pro se services to assist individuals appearing in immigration court without counsel. We have been able to maintain and expand representation for immigrant youth and others at risk of removal and of losing access to immigration relief for which they qualify. In addition to retaining knowledgeable staff, we have been able to hire additional legal staff to contribute to these expanded efforts. Thanks to the City's investment, CCCS continues to serve thousands of clients each year, providing not only legal assistance but also hope and stability in an increasingly uncertain environment.

These critical NYC programs, and their impact, include:

New York City Council

- Immigrant Children Advocates Relief Effort (ICARE). In August 2026, CCCS's award for the ICARE program increased from \$620,000 to \$3,538,256, after several years of no increases in funding. This welcome and substantial increase in funding is allowing us to serve a minimum of 700 New York City children, primarily with legal representation in asylum, Special Immigrant Juvenile Status (SIJS), and related immigration court proceedings. We partner with the other ICARE members to maximize efficiencies and services for this vulnerable population. This additional funding is particularly important in the face of instability in our federal UC funding.
- Special Immigrant Juvenile Status (SIJS) Project. CCCS was awarded \$300,000 to

provide immigration representation services for youth aged up to 21 who are eligible for SIJS protections. CCCS is working with the ICARE Coalition, other funding recipients, and the City to identify youth most in need of these services, with a focus on those who will age out of protections during the year. We expect to assist up to 100 additional young people with this funding, depending on the services they require.

- Asylum Seeker Legal Assistance Network (ASLAN). Critically, the Council replaced and increased the ASLAN funding previously awarded by MOIA. In FY25, the ASLAN award from MOIA nearly doubled the budget for our MOIA Immigration Legal Support Hotline, enabling us to answer more than 90% of incoming calls and spend more time with callers in need, as well as supplementing our legal services programming. The award from the Council means that we will be able to further diversify our in-office language capabilities to directly answer calls in multiple languages (in addition to using the Language Line), conduct outreach to New York’s underserved immigrant communities, and ensure coordination between our Hotline and legal services teams.

Mayor’s Office of Immigrant Affairs

- Legal Support Center (LSC). This new, three-year program funds CCCS to provide community-based, varied services to Bronx residents, on site at our Bronx office and a community-based organization that provides case management and basic needs to community residents. In FY 2026, we anticipate accepting 30 cases for representation and providing other legal services to 334 individuals.
- ActionNYC Extension. While the ActionNYC program structure has ended, MOIA extended our contract for one year with generous funding, so that we can provide services for people needing initial screenings and advice as well as for those who need help preparing for immigration court hearings. These services are being provided at our offices and in partnership with New York City public schools. We will serve more than 1,600 people with this extension, providing a combination of consultations, pro se case filings, immigration court accompaniment and hearing preparation, Know Your Rights sessions, and targeted representation.
- Haitian Response Initiative (HRI). Continued funding for the HRI coalition members, including CCCS as the legal services provider, will ensure that Haitian New Yorkers continue to receive assistance understanding their legal options and with their immigration cases. The CCCS team provides consultations, pro se case assistance, and/or legal representation, with all services provided directly by fluent Haitian Creole speakers. This work is particularly important now, when protections for Haitian immigrants are being stripped away and many need legal advice about other options. CCCS will provide legal services to 635 Haitian New Yorkers in FY26.
- Hotline Award and Supplement. MOIA initially awarded the same level of funding for the Immigration Legal Support Hotline as last year—\$575,000— which would have

resulted in staff layoffs, but later supplemented the award with an additional funding tranche. The additional funding of \$306,500 will enable us to provide a dedicated rapid response information counselor, expand our hours by two days per week, and pilot Saturday openings.

Other New York City Programs

- Immigrant Opportunities Initiatives (IOI). As a long-time subcontractor on two multiyear IOI awards from the Human Resources Administration, in coalitions led by The Legal Aid Society and TakeRoot Justice, respectively, CCCS is able to provide representation and other services to more than 690 New Yorkers each year in stable programs. Both multiyear contracts end in 2026, with the new RFP process underway.

At a time when federal policy is increasingly focused on immigration enforcement, detention, and deportation, New York City continues to represent a national model for compassion and justice.

Without the above support for CCCS, and support for our peer agencies, we would have a crisis of children appearing alone before immigration judges in proceedings they cannot understand, and even higher numbers of immigrant New Yorkers in immigration court and facing detention and removal without understanding their cases and options. These immigrant neighbors would continue to live in fear, and their contributions to our thriving city would be lost. The Council's continued partnership affirms that New York City stands with its immigrant residents. It also demonstrates that the City recognizes immigrant New Yorkers as essential members of the communities that make this city strong, diverse, and vibrant.

On behalf of Catholic Charities Community Services, I want to thank the Council once more for recognizing the importance of this work. Looking ahead, we respectfully ask the New York City Council to consider the following priorities to ensure that the City's investment remains effective and sustainable:

1. **Multi-year funding commitments** would allow CCCS and other organizations to thoughtfully plan and implement long-term programming, including acceptance of complex cases for long-term representation and uninterrupted services for communities and clients. It would also provide stability for our staff and help us retain experienced team members.
2. **Early award notifications** would give legal service providers the certainty of future funding needed to avoid staff reductions, service gaps, and delays in casework during transitions between fiscal years. For example, the increased awards from the Council for FY26 were announced more than a month after the beginning of the fiscal year, after we had reduced a number of staff positions working on eliminated or reduced programs. Once we have hired new staff, we will be several months into the contract year. Those new staff need to be trained before they can function at full capacity, and then CCCS may not learn until after the contract period ends whether the positions will be funded after

June. Earlier notifications would have enabled us to avoid some layoffs, hire earlier, and have trained staff ready to begin services immediately.

3. **Regular funding increases** would keep pace with the increased costs faced by service providers and enable us to continue providing the same levels of service. Otherwise, we are faced with the prospect of reducing staff and services to control our annual expenditures.
4. **Timely payment of contracts** would prevent operational disruptions that affect CCCS payroll and potentially put client services and staffing at risk.

These measures would strengthen the City's network of immigrant-serving organizations and protect thousands of New Yorkers who depend on stable, ongoing representation. New York City has long led the nation in its commitment to welcoming and protecting immigrants. Your continued partnership ensures that, even as federal priorities dramatically shift to punishment and separating families and communities, immigrants in our city continue to receive the representation, protection, and dignity they deserve.

Thank you for your time and for standing with immigrant New Yorkers. I look forward to continuing our collaboration to ensure that all immigrants in our City have access to justice and a chance to thrive here. If you have any questions about my testimony, please contact me at desiree.hernandez@cccsny.org.

**Testimony of Catholic Migration Services before the Committees on Immigration
October 28, 2025**

Good Morning Honorable Chair Aviles and Members of the City Council, my name is Raluca Oncioiu and I am the Managing Attorney of the Immigration Unit at Catholic Migration Services. I appreciate the opportunity to speak with you today. I will be sharing with you how the Trump Administration's recent immigration policies have impacted the provision of immigration legal services and proposals of how the City can continue to support immigration legal services programs.

I. The Impact of the Administration's Immigration Policies on the Provision of Immigration Legal Services

Since the onset of the Trump Administration, immigrant communities and the legal service providers who support them have faced an unrelenting onslaught of immigration policy changes. These sweeping changes have significantly ramped up enforcement, restricted legal pathways, and created widespread fear among immigrant communities. This barrage is not accidental—it is designed to instill fear and drive out non-citizens, including those who are lawfully present or eligible for legal status. It also aims to overwhelm immigration legal service providers, who must constantly pivot to analyze new policies, develop responses, retrain staff, educate communities, and litigate complex cases in unfamiliar legal settings, such as federal courts.

Every aspect of our immigration system – already complex, cumbersome, and inhospitable – is now under intensified attack, as the following examples will demonstrate.

Navigating our immigration court system has become even more challenging both for unrepresented immigrants and represented clients. Asylum applications are being pretermitted (dismissed without hearings) for legal insufficiency, especially for claims based on domestic violence, gender, or family relationships. And now a new basis for pretermittance is emerging: the argument that asylum-seekers should seek protection elsewhere, in countries with which the United States has signed Asylum Cooperative Agreements, such as Honduras. To overcome this, applicants must now demonstrate a fear of persecution not only in their home countries but also in these third countries, but may not get an opportunity to do so if their cases are pretermitted.

Another development is that experienced judges are being fired and will be replaced with Temporary Immigration Judges (TIJs), including military lawyers, who lack prior immigration law experience. This will undoubtedly result in more negative, erroneous decisions, so lawyers will have to file appeals that will likely be dismissed by the Board of Immigration Appeals and will have to be litigated in federal court, a time-consuming and resource-intensive process.

And as we are all too painfully aware, ICE arrests continue at the New York immigration courts. Some immigrants are frightened to the point where they miss their court hearings, even though they know they will be ordered deported for not showing up. Those who do show up and are detained are often transferred far from legal counsel and support networks, and they are not eligible for release on bond. In order to secure their release, their lawyers have to file *habeas* petitions in federal court. Most

immigration attorneys rarely file with or litigate in federal court. National and local organizations are providing trainings on *habeas* litigation and sharing helpful templates, and a few CMS attorneys have participated in these trainings. However, because federal litigation and *habeas* petitions are complex and time-consuming, and because our legal staff are at capacity, we will not be able to take on *habeas* cases until we hire additional experienced attorneys.

The second Trump Administration has also continued to actively target Temporary Protected Status (TPS), as it did in during the first Trump Administration. TPS is temporary legal status granted to nationals of certain countries where their return would be unsafe because of war, civil unrest, natural disasters, or other extraordinary circumstances. Nationals of these countries who are granted TPS while unsafe conditions in their countries persist are safe from deportation and immigration arrests, and eligible for work authorization and permission to travel and return to the United States. Since the start of the second Trump Administration, TPS was terminated for nationals from five countries, including for individuals from Afghanistan and Venezuela despite the fact that conditions in their countries have not improved, meaning that they are no longer protected from deportation or eligible for work permits. TPS for nationals from eleven other countries, including for Syrians and Haitians, will end later this year and next year. As a result, hundreds of thousands of nationals of these countries - many of whom have resided in the United States for decades, building lives here, raising families, paying taxes, and contributing to our society – will become undocumented, at risk of deportation, and no longer authorized to work legally. CMS and other legal service providers now have to assess their eligibility for other immigration benefits, as well as the risks of applying for such benefits.

Even applying for immigration benefits with USCIS has become increasingly risky and has exposed undocumented applicants to immigration arrests and deportation proceedings. In February 2025, USCIS authorized its officers to start removal proceedings against undocumented noncitizens whose applications for immigration benefits – including green cards, family petitions, TPS, and even U and T humanitarian visas for survivors of violent crimes and trafficking – have been denied. Additionally, USCIS also announced that discretionary immigration benefits, which include family-based green card applications, and may be denied based on applicants’ social media activity, particularly if it reflects antisemitic or “anti-American” views.

Another seemingly minor but deeply consequential change is the shift in application fee payment methods. As of October 28, 2025, applicants must use credit cards or electronic bank drafts instead of checks or money orders. While this may appear administrative, it poses a serious barrier for immigrants without access to banking services or credit. Combined with the new fees introduced by the One Big Beautiful Bill Act, this change threatens to block access to legal immigration benefits for many vulnerable individuals.

Last but not least, recent federal policy changes have introduced new barriers to naturalization, including stricter “good moral character” criteria and more complex N-648 medical certification for disability exceptions to the civics test. The combined impact of all of these policy changes is to make it more difficult for legal permanent residents to become United States citizens and for immigration legal service providers to assist them in the process. As a result, assessing eligibility for naturalization has become more resource-intensive and time-consuming.

The bottom line is that in today's immigration landscape, **no group is immune from risk**—not individuals granted TPS, not asylees or refugees, not permanent residents, and not even naturalized citizens. Even routine applications for immigration benefits now carry significant risks and must be approached with caution—or, in some cases, not pursued at all.

II. The Unprecedented Attack on Immigrant Communities and the Continued Urgent Need for Free Immigration Legal Services Requires Additional Action from the City.

We acknowledge that the City has responded to this critical moment and made a significant investment in immigration legal services programs in this year's budget. **We thank you very much for recognizing and supporting the urgent need for funding for this work, however, further attention to the needs of immigration non-profits is still needed.**

In 2024, Mayor Adams announced a Cost of Living Adjustment (COLA) to provide a 3% annual increase for human services workers as a response to advocacy efforts by the City's non-profit service sector. This increase, however, has not trickled down to sub-contractors who work in coalitions that contract directly with the City. This has left agencies, like CMS, without access to the 3% COLA to meet rising personnel costs that have increased sharply over the last few years. For smaller non-profits, like CMS, the only way to contract with the City is through collaborations with other organizations to facilitate the contract and reporting management of large grants. **We seek the Council's support in ensuring that all city non-profits obtain the important benefit of 3% COLA of base lined contracts to benefit its hard-working staff**

Additionally, we encourage the City to further invest in local naturalization programs to ensure that eligible immigrants can safely and successfully complete the path to citizenship. The Trump Administration has slashed federal funding for naturalization programs, making it imperative for the city to sustain and expand these critical services. Unfortunately for CMS, which has operated a strong, clinic-driven naturalization program for over a decade, cuts in this program resulted in the loss of an accredited representative position. Given the staffing loss and mounting administrative barriers, CMS expects to file 60 to 70 fewer naturalization applications this year.

We also encourage the Council to find opportunities to fund community-based organizations (CBOs) that provide essential support to legal services providers. CBOs play an essential role in conducting outreach in immigrant communities, providing legal information, interpretation, translation of documents, and making referrals to legal services providers. For ten years, the City acknowledged the critical role that CBOs play in providing advocacy and support to immigrants through funding in the base lined HRA Immigrant Opportunities Initiative (IOI) contract. CMS is a member of the Citywide Immigrant Legal Empowerment Collaborative (CILEC) consortium, a current HRA IOI contractor, which includes CBOs such as NICE, Chinese Staff and Workers, NMASS, and Damayan. These CBOs have helped legal services providers reach a wide and diverse population including linguistically marginalized immigrants. In an RFX for a new IOI contract that was issued last year, specific funding for CBOs was eliminated. We urge the City Council to find opportunities to fund our CBO partners for their critical work.

Given this harsh and evolving immigration enforcement landscape and the frequent policy shifts, it is essential to fund experienced immigration legal service providers capable of adapting quickly to emerging challenges. It is also critical that funders allow immigration legal service providers the flexibility to respond to evolving policies, rather than imposing rigid deliverables. City contracts should also acknowledge and fund the real cost of supervision of front-line immigration attorneys to ensure high quality services are provided to communities most in need. Endorsing a framework that funds the critical time that supervisors provide ensures that agencies are providing high quality work and that advocates and attorneys on the ground are receiving the necessary support to combat burnout and increase retention.

Although full legal representation remains the gold standard in today's increasingly complex and hostile immigration landscape, the demand for qualified immigration attorneys and accredited representatives far exceeds the available supply. **We are very grateful the City Council recognized the importance of Pro-Se programs and funded CMS and other Pro-Se Plus providers this fiscal year through the Asylum Seeker Legal Assistance Network (ASLAN).** It is imperative that funders continue to invest in and expand support for pro se legal assistance programs, which play a critical role in bridging the gap and ensuring access to justice for vulnerable immigrants. CMS is part of the Pro Se Plus Project (PSPP), a collaboration of immigration legal services providers and community-based organizations. Recently, the project has shifted its focus from filing initial asylum applications to supporting individuals through the later stages of the immigration process. This support includes preparing personal declarations, providing guidance on what to expect during individual hearings, assisting with document translation, and helping assemble and file evidence packets. Amid the recent surge in unlawful ICE detentions during routine appointments such as check-ins and master calendar hearings, PSPP has implemented a range of protective strategies, including emergency family planning sessions, filing pro se motions for remote court appearances, and developing shared advocacy materials for detained individuals accompanying clients to court.

Thank you so much for the opportunity to testify here today.

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Chinese-American Planning Council, Inc.
Testimony Before the New York City Council Committee on Immigration
Council Member Alexa Avilés, Chair
October 28th, 2025

Thank you Chair Avilés and members of the City Council for the opportunity to testify today. The mission of the Chinese-American Planning Council, Inc. (CPC) is to promote social and economic empowerment of Chinese American, immigrant, and low-income communities. CPC was founded in 1965 as a grassroots, community-based organization in response to the end of the Chinese Exclusion years and the passing of the Immigration Reform Act of 1965. Our services have expanded since our founding to include five key program areas: Early Childhood Education, School-Age Child Care, Education & Career Services, Senior Services, and Community Services.

CPC is the largest Asian American social service organization in the U.S., providing vital resources to more than 80,000 people per year through more than 50 programs at over 30 sites across Manhattan, Brooklyn, and Queens. CPC employs over 700 staff whose comprehensive services are linguistically accessible, culturally sensitive, and highly effective in reaching low-income and immigrant individuals and families. To that end, we are grateful to testify about issues that impact the individuals and families we serve, and we are grateful to the Council for their leadership on these issues.

With the most [recent immigration raid targeting Chinatown](#), a neighborhood where CPC has deep roots in, serving thousands of community members every year, it has been evidently clear that these inhumane measures are not about “stopping crime” but a racialized attack. In addition to raids in Latinx and AAPI communities, the raid on Canal Street targeted primarily Black street vendors. In response to the aftermath of the raid, the ICE director announced that the number of raids will dramatically increase in NYC, demonstrating the urgency in strengthening our sanctuary city laws and passing the New York for All Act on the State level.

Arrests of immigrants from Asian countries, including China, Bangladesh, Nepal, and India, have increased significantly compared to last year. According to a new analysis by THE CITY, which examined federal records from the Deportation Data Project, there has been a 1,044% rise in arrests of Chinese immigrants and a 1,000% increase in arrests of Bangladeshi immigrants from 2024 to 2025.¹ In New York State, 24% of unauthorized immigrants are from Asia, and one in seven undocumented immigrants is Asian. These immigrants will now face a mandatory \$5,000 fee for failure to appear at court hearings. Asians are also the largest group of new green card holders in the last decade and now face high fees of \$1,500 to adjust their green card status and \$1,050 waivers of inadmissibility fees.

The demand for legal services has increased tremendously and we have seen firsthand and on the ground the confusion and fear that changes in immigration protocol and policies have had on the community. In addition, we are hearing overwhelming fears over losing essential public benefits under the most recent passage of the federal budget bill.

¹ Chu, H., & Hogan, G. (2025, July 14). NYC Immigration Arrests Just Shot Through the Roof, New Data Shows. THE CITY - NYC News.
https://www.thecity.nyc/2025/07/14/ice-migrant-arrests-trump-administration-deportations-data/?utm_medium=email&utm_campaign=SCOOP%2007142025&utm_source=ActiveCampaign

At CPC, we have worked tirelessly with the goal of keeping our immigrant communities and families safe and together. Over the past year, we have been able to hire an in-house staff attorney that has been able to reach at least 1,000 community members alone with our KYR training, legal clinics, and other legal resource events. We have been able to facilitate “train-the-trainer” sessions on family safety planning and as part of our legal clinic, we have assisted community members in drafting letters to USCIS, and supported families in preparing important legal documents like powers of attorney and standby guardianship. We have maintained a robust legal referral network with partners such as NYLAG, LAS, NYLPI, AABANY, and others. We collaborate with national organizations like the American Immigration Lawyers Association (AILA) through its Client Resources Committee to help develop educational materials for immigrants across the country.

CPC is a trusted resource and advocate for our community members. While we have been and will continue to provide immediate support to our community, we know that limited resources and the growing demand is not sustainable for our staff. Our community members are mothers, fathers, daughters, sons, caretakers, and critical parts of our community and deserve the chance to live the so-called “American Dream” that was once promised to them. Below are some of the challenging experiences that our community members have had to endure over the last year:

- A community member sought services in our walk-in community services because his family had an upcoming immigration check in on the day his wife was due to give birth. The immigration officer refused to change the date even though they had just seen his wife and child while she was eight months pregnant the month before. His private immigration lawyer refused to help him speak with immigration agencies and did not answer his questions about how to handle the check in, so our CPC staff attorney wrote a letter requesting that immigration officers change the date, and attached exhibits about the medical issues, proof of the anticipated due date, and other proof that the family was following all the rules to the best of their ability. The week before, confirmed the family no longer needed to come in, and the mom gave birth to a healthy baby girl safely in the hospital.
- The father of a six year old child in one of our childcare programs was recently detained at an immigration check in. He had just missed the routine check in for his asylum case the week before because he was recovering from being hit by a car as he was working as a bike delivery person. His wife went to the check in to try to explain this situation but was told if he did not come in next week, law enforcement would go find and arrest him. Although he is still detained, we were able to facilitate finding him an attorney with NYIFUP/Legal Aid Society, and our safety plan document checklist allowed his wife to gather many of the necessary documents in order to allow LAS to quickly respond to the situation.
- In September, one of our community members was detained along with some of his Latine and immigrant friends while hanging out in a public park. Law enforcement agents came in an unmarked van, asked everyone for ID, did not show a warrant, and immediately detained them. Many people in the group have already been transferred out of state. He thought he had no rights and would have to pay for his return trip to El Salvador (despite other federal official claims that immigrants can receive a \$1000 bonus for self deporting). He came to the US unwillingly with his father when he was only 14, had no criminal record, and could have qualified for multiple immigration statuses at that time if he had only spoken with the right lawyer. He’s the father of a young USC child. He was held without the ability to make phone calls out of the facility for two weeks. Law enforcement only let him make phone calls after we visited the facility and we helped him

file a habeas petition. Now he gets an opportunity to plead his case in front of a federal judge, and has been assigned a lawyer.

- A 67 year old Chinese speaking LEP community member has been detained in Moshannon Valley, PA, the same facility where Chaofeng Ge committed suicide earlier this year, without counsel for almost 6 months. China is refusing to accept him back into the country, and DHS is likely to try to deport him to a third country. Despite being in immigration enforcement custody, he missed a chance to speak with a judge because the document about the hearing was not translated, and no one from law enforcement brought him to the hearing. He has lived and worked hard in the US for over 30 years, keeping his head down. His family cannot afford a private lawyer and so far has not been able to find any legal services organizations in NYC or PA that are able to take this case, so we are helping them file a pro se habeas as well.

Community members are facing a surge in detentions, particularly during immigration check-ins, where many are unaccompanied by overburdened attorneys. Parents are living in fear, forced to create safety plans as raids occur in public spaces targeting people based on race. Increased scrutiny around "Good Moral Character," disability exceptions, and a harder citizenship test have led to widespread confusion. We also have concerns that families involved in ACS or family court proceedings are being detained due to issues appearing on background checks. Additionally, federal cuts under HR1 and general misinformation are causing many to lose critical benefits. Both public and private immigration lawyers are stretched thin, and rampant scams and online misinformation worsen the situation. Rapid policy shifts require community-based organizations like ours to constantly adapt, placing immense strain on staff time, emotional well-being, and capacity as they strive to support those affected.

We are urging the City to continue to invest deeply in resources for immigrant communities, including legal services and wraparound support, language access, and resource navigation and specifically the organizations that have been doing this work in the FY27 budget. As mentioned previously, the Federal administration has vehemently violated sanctuary laws and the Council needs to ensure that we uplift and strengthen them to ensure accountability:

- **Prioritize addressing contracting issues that pose barriers for CBOs to promptly receive funding to deliver crucial services.** We applaud the City Council's efforts to improve contracting processes for our CBOs. We ask that the City Council continue holding the Mayoral administration accountable for streamlining the contracting and procurement process of culturally-competent safety net programs to ensure CBOs receive funding promptly to deliver crucial services.
- **Streamline communication with the AAPI RISE Network.** We urge the Council to work with the RISE Network, which is made up of nearly 20 Asian-led and serving organizations providing immigration case management and legal services, to establish clear lines of communication so our CBOs have an established, regular opportunity to share how immigration enforcement is impacting the AAPI community.
- **Pass the NYC Trust Act (Intro. 214)**, sponsored by Council Member Shahana Hanif that would create a private right of action in the city's civil immigration detainer laws
- **Pass Intro. 395**, sponsored by Council Member Keith Powers, prohibits the police department from detaining an individual beyond the time when such person would be otherwise released from custody, without a judicial warrant.
- **Pass Intro. 386**, sponsored by Council Member Keith Powers, prohibits the Department of Correction from communicating with federal immigration authorities regarding any person in the department's custody.

We appreciate the opportunity to testify on these issues that so greatly impact the communities we serve, and look forward to working with you on them. If you have any questions, please contact Ashley Chen, Policy & Research Manager at achen9@cpc-nyc.org.



Damayan Migrant Workers Association

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Damayan Migrant Workers Association Testimony to the New York City Council Committee on Immigration October 28, 2025

Thank you, Chair Avilés, Council Member Brewer, and Council Member Caban for holding this hearing and for providing us the opportunity to testify. Also, Happy Filipino American History Month!

I'm Riya Ortiz, Executive Director at Damayan Migrant Workers Association, and we serve, empower and give life-saving services to low-wage Filipino workers in New York City, mainly in Woodside, Elmhurst, Sunnyside, and neighboring areas. Today I'm testifying with our partners from the Rapid Immigration Support and Empowerment (RISE) Network, a coalition of about 20 Asian-led and Asian-serving organizations offering immigration case management and legal services to New Yorkers.

Last year, Damayan helped Claire (not real name), a trafficked Filipina domestic worker mother escape from her traffickers who brought her from Taiwan to work as a domestic worker in the Upper East Side. She signed a contract thinking that she would work for a better future for her five children back home.

Instead of working 40 hours a week, she worked from 5am to 10pm, seven days a week. Instead of getting paid minimum wage, she was working \$3.57/hour. Instead of following her dream, her life turned into a living nightmare.

Afraid and alone, Claire sought Damayan's help. When Claire needed help to escape from her traffickers, Damayan helped her create an escape plan.

When Claire became undocumented because her immigration status is tied to her trafficker, Damayan connected her to an immigration attorney who is helping her apply for a T-visa so she can become documented again.

Since the beginning of the current administration, many domestic workers like Claire have worked as live-in domestic workers because they are afraid to interact with ICE while traveling to work. They work longer hours for little pay, with no overtime, and

remain vulnerable to abuse. In the past few months, we helped a couple of trafficked domestic workers escape their traffickers.

Claire is one of the many trafficked domestic workers that Damayan has helped. Damayan assists trafficking survivors in creating escape plans, refers them to shelters and counseling to help manage post-traumatic stress, arranges medical care for injuries due to trafficking, and connects them with other social services. We also help them receive financial assistance through the Trafficking Victims Assistance Program (TVAP). Additionally, we help file civil cases against the traffickers. Since our founding, we have helped more than 80 trafficking survivors become documented again, and 40 of those survivors have been reunited with their families. We have also recovered more than \$2 Million in stolen wages.

None of these would have been possible if not for the support of New York City Council and groups like the RISE Network. Damayan joined the RISE Network to help us respond more quickly and effectively to immigration challenges facing vulnerable Asian New Yorkers. CBOs are essential as successful immigration services depend on deep community ties and multilingual capacity. Direct funding to Asian-led organizations accelerates immediate immigration support.

We believe that we deserve a future where New York City continues to support Asian-serving organizations that provide culturally and linguistically competent services to our communities. We respectfully ask the New York City Council to:

- 1) **Protect and expand funding for the following initiatives included in the City Council's September Transparency Resolution:** Legal Services for Day Laborers & Domestic Workers, and the Immigration Legal Services for Survivors of Violence and Gender Based Harm.
- 2) **Prioritize supporting small- and mid-sized CBOs serving Asian immigrant communities.** CBOs like Damayan are trusted partners with deep relationships with vulnerable community members who are less likely to interact with mainstream organizations and government systems in this current environment.
- 3) **Prioritize removing contracting barriers so CBOs receive funding quickly for crucial services.**

Thank you for allowing us to testify, and we look forward to working with you to make sure Asian-serving communities get the support they deserve.



Testimony: Hamra Ahmad, Head of Legal Programs and Policy
Hearing: Oversight Hearing on Legal Services for Immigrant New Yorkers
Host: Committee on Immigration
Date: October 28, 2025

Thank you, Chair Avilés and the Committee on Immigration for the opportunity to submit testimony on this critical matter. I am Hamra Ahmad, the Head of Legal Programs and Policy at Her Justice, a nonprofit organization that has advocated with and for women living in poverty in New York City for more than 30 years. Her Justice provides free legal assistance to women living in poverty in New York City through a “pro bono first” approach in the areas of family, matrimonial and immigration law. We train, mentor, and support volunteer attorneys to address the individual and systemic legal needs facing our clients. Since our founding in 1993, Her Justice has assisted tens of thousands of New Yorkers. Among the clients we served in 2024, 92% are women of color and 85% are survivors of domestic violence. Three-fourths of our clients were born outside the U.S., coming from 103 countries across the world.

The incredible unmet need for competent immigration legal services in New York City is greater than ever before, as recent government directives increasingly attack the fundamental rights and safety of immigrants, regardless of their legal status. Her Justice has long served immigrant New Yorkers, building since 2005 a specialized immigration practice representing undocumented survivors of domestic violence, sex trafficking, labor trafficking, and other forms of gender-based violence. Her Justice offers a full range of direct immigration legal services to meet clients where they are on their legal journey, including advice and counsel and richly resourced full representation through our pro bono leverage model. Our attorneys represent survivors across a broad range of remedies under the Violence Against Women Act, U and T visas, and citizenship applications. We are seeing increased demand for our services, with both new clients seeking assistance and former and existing clients seeking new kinds of support, as even what once felt like secure legal status is now under threat.

Support from the City Council enables Her Justice to continue providing skilled representation in an arena that often fails to adequately serve marginalized immigrant survivors. The current federal administration has contributed to a heightened demand for legal services, increased economic instability, decreased funding for nonprofit organizations, and a potential reduction in pro bono support, thereby underscoring the critical importance of support from the City Council. Every day, our staff attorneys provide women with information about the legal remedies available to them and advise and strategize with clients to help them weigh their options and decide the course that is right for them and their children. We urge the City Council to reaffirm its partnership with organizations like Her Justice in recognizing legal services as essential to immigrant survivors’ economic well-being and safety.

Organizational Background

Legal services. Her Justice offers information, advice, brief services and full representation in support, custody and visitation, and order of protection matters in Family Court; divorces in Supreme Court; and immigration matters under the Violence Against Women Act. Our staff responds to those who contact us with a broad array of legal advice, review of papers, and, for some, tools to ensure they get the best outcomes they can on their own. Through our pro bono first model, pairing thousands of trained attorneys from premier firms with women who have urgent legal needs, Her Justice



reaches far more women than would be possible through direct service alone. It also allows Her Justice to offer representation for many of the cases other legal services organizations do not have the bandwidth to take on – for example, child and spousal support matters, and litigated divorce. In addition to training and mentoring pro bono attorneys, Her Justice in-house attorneys provide representation to some clients whose legal issues are particularly urgent or complex. This both meets critical needs and allows staff attorneys to remain fully expert on the legal issues on which we train and provide support. Through this model, we help more women make their voices heard and begin to dismantle barriers to justice.

Community outreach. Her Justice also works to ensure that women living in poverty in New York City are knowledgeable about their legal rights and available remedies, reducing barriers to access to justice. We conduct targeted, culturally sensitive know-your-rights and capacity-building trainings for community-based organizations. Prospective clients learn of our services from colleagues at legal and social services agencies throughout New York City, including the Family Justice Centers, bar associations, elected officials' constituent services offices, court and law enforcement personnel, schools, shelters, hospitals, our website, LawHelp.org and word of mouth. Our website, provides accessible information about legal rights and free assistance, and our staff regularly present at partner organizations to share these resources.

System reform. We believe that the client-centered services we provide must also be paired with policy work – through independent efforts and in partnership with peer organizations and coalitions – to advance systemic reform while meeting individual need. The principle of our policy work is that it is informed by the lived experience of our clients – women living in poverty, whose livelihood and well-being are often determined by the civil justice system. Because the civil justice system is often invisible to those outside it, we work to elevate reforms that make it fairer for all who depend on it. Through this framework, we begin to break down systemic barriers that are built into our civil justice system and that reinforce and exacerbate economic, gender and racial imbalances.

Providing Legal Assistance to Immigrant Women Living in Poverty

The Her Justice immigration practice has a proven track record of excellence, and its impact grows every year providing free legal assistance to clients who have experienced domestic violence, sex trafficking, labor trafficking, and other forms of gender-based violence as they seek to stabilize their immigration status in the United States. These services are especially vital because abusers and traffickers often exploit a survivor's lack of legal status as a means of control.

Her Justice lawyers and the pro bono attorneys that provide representation stabilize cases and work with clients to prepare applications. Yet, the U.S. Citizenship and Immigration Services (USCIS) continues to raise barriers to our clients' ability to stabilize their lives and work legally in this country. Our clients are still reeling from the pandemic's destabilizing impact on their lives and communities. Changes in immigration policies and news items related to proposed changes in laws (that may never come to fruition), along with threats of harsh immigration enforcement, cause confusion and fear in immigrant communities. The need for free, quality, and culturally and linguistically competent immigration legal services and accurate, accessible information in immigrant communities has never been more critical.

Reaching Vulnerable Immigrants in Community



To reach vulnerable immigrants in New York City, Her Justice uses a proven outreach model combining capacity-building for local offices, know-your-rights events, and legal clinics in partnership with trusted community-based organizations and District offices. Her Justice engages in capacity-building training for local providers – especially where they do not have legal staff – with a focus on those programs that serve communities particularly isolated by culture or identity. These trainings equip advocates to share accurate legal information and refer clients to Her Justice and other providers. All programming is responsive to local language and cultural needs. We also enhance our online know-your-rights resources and social media outreach, providing reliable information about immigration enforcement and legal protections, meeting communities where they seek trusted guidance.

Immigrant Survivor Employment Access Project

New York City is home to more than three million immigrants, making up approximately 36% of the City’s population and 43% of its workforce, yet many immigrants are forced to work in low-paying or low-skill jobs due to lack of legal employment authorization.

An undocumented immigrant may apply for an employment authorization document (“EAD”, alternately referred to as “work authorization”) either in conjunction with an application or petition for immigration status or in a separate filing. Once obtained, an EAD provides proof that the individual is authorized to work in the U.S. These key documents enable survivors to exit the informal economy, where they are paid less and often exploited, and allow them to work legally so that they can provide safe and stable homes for themselves and their children. A survey we conducted in 2019 found that **women with work authorization are paid, on average, \$330 more per week than those working without authorization.** For low-income families, this increase in income makes a profound difference in their ability to thrive.

For immigrant survivors, work authorization is a first critical step toward autonomy and safety, unlocking access to Social Security numbers, healthcare, housing, safer work conditions, and economic stability that can break cycles of poverty and abuse. The process for obtaining work authorization is long and confusing, and the obstacles to attaining legal status and personal safety are especially formidable for our immigrant clients. This process has only become even more challenging and dangerous in the current political climate, with threats to deny access to work permits for U visa petitioners with pending bona fide determination status and roll back a 2021 policy. Her Justice is one of few City organizations providing free representation in these complex and intimate matters and engaging in research-backed policy advocacy to maintain key protections for immigrant survivors.

The Her Justice Immigrant Survivor Employment Access Project provides direct legal services, community outreach and capacity-building for partner organizations to support immigrant survivors of gender-based violence in their applications for work authorization so that they can obtain and/or maintain safe and stable employment. In response to the increasingly urgent needs of immigrant survivors, we seek to further expand our capacity to provide undocumented survivors with a clear pathway to access the transformative legal services that ensure safety, financial stability and freedom. Our outreach approach, built on 30 years of partnerships with trusted local organizations, helps immigrant



survivors isolated by language and fear understand their legal rights, assess eligibility for work authorization, and avoid exploitation.

In addition to the direct services we provide, **we also work to reform the civil justice system so that the greatest number of immigrant women can obtain and preserve the best possible immigration status** through a process that prioritizes their safety and dignity. We believe the challenges facing undocumented women like our clients in securing critical legal help stem from the institutional bias and class inequity that pervade the very foundation and operations of the legal system. Yet we also believe that the law can be a powerful tool of change. That's why we strive both to assist the individuals who move through the civil justice system and to advance system change to create a more fair and functional civil justice system for all New Yorkers. Through the Immigrant Survivor Employment Access Project, we open pathways for survivors to enter the formal workforce and secure stability for their families.

Advocating for System Reform

Alongside direct services, Her Justice advocates for reforms that help immigrant women obtain and preserve status through processes that prioritize safety and dignity. Her Justice is grateful to the Council for continuing to shine a light on the harms facing immigrant New Yorkers who are more vulnerable now than ever.

Access to the Courts. During the last several years, we have dedicated significant time and effort to advocating against undue and unfair immigration enforcement actions, including preventing U.S. Immigration and Customs Enforcement from making arrests in the courts, which have had a chilling effect on our clients' willingness to seek help. In 2020, we were thrilled to witness the passing of the New York State Protect Our Courts Act, which marked significant progress towards decriminalizing our immigrant communities and making justice accessible to all. It is a key policy position of Her Justice that laws and policies providing relief to survivors of gender-based violence should not require survivors to cooperate with or seek safety from law enforcement to prove their experience of abuse, since survivors seek safety in many ways. Our policy and advocacy work aims to lift up the need for fair treatment of immigrant New Yorkers and the power of meaningful access to justice and benefits to change lives.

Work Authorization and Economic Stability. Her Justice knows that our immigration clients – and all immigrant New Yorkers – make remarkable contributions to and are part of the very fabric of our City. In 2023, Her Justice published a policy research report, *Stories from Immigrant Survivors of Gender-Based Violence: The Impact of Work Authorization*, which brings forward the experiences of immigrant survivors seeking legal permission to work in the United States and explores the impact on their lives – as women, mothers, and workers – of obtaining work authorization. Our findings highlight that most clients are mothers supporting families and contributing to New York's economy, yet many still work without legal protections matching their value. Our research found long delays in EAD approvals and severe economic insecurity among survivors, with many unable to leave abusive partners due to financial dependence.

We believe this research demands a commitment from policymakers to addressing the needs of all undocumented immigrants for safe and secure employment, especially immigrant survivors like those featured in this report who lived in the U.S. for years without the legal right to work to support themselves and their children while seeking safety from abuse.



Her Justice's commitment to advocating for a more equitable immigration system is informed by the experiences of immigrant survivors of abuse, and we call for their needs to remain a priority in immigration reform and in City and State efforts to protect the rights of immigrant New Yorkers.

There are over 3 million immigrants in New York City, and immigrant women represent more than half of Her Justice's clients. When immigrant women are lifted, their families and communities rise with them. We thank the City Council for its continued partnership and support of essential legal services and policy reform to strengthen justice for all New Yorkers.

Respectfully,

Hamra Ahmad, Esq.
Head of Legal Programs and Policy
hahmad@herjustice.org



Testimony to the New York City Council Committee on Immigration October 28, 2025

Good morning, Chair Avilés and members of the Committee on Immigration. My name is Lisa Zhen, and I am the Director of the Social Services Division at Homecrest Community Services. Thank you for the opportunity to speak today.

Homecrest provides community-based multi-social services to low-income older adults, families, and immigrant communities in our four centers across Southern Brooklyn, most of whom are Asian American. Every day, we help clients apply for public assistance, healthcare, affordable housing, and citizenship - all in their preferred languages.

We're here today testifying alongside our partners at the Asian American Federation (AAF), specifically the Rapid Immigration Support and Empowerment (RISE) Network, a coalition of nearly 20 Asian-led and Asian-serving organizations that provide immigration and legal support to New Yorkers.

Last week, Homecrest conducted a community survey ahead of the general election. Nearly half of respondents said language or translation needs were among their biggest challenges, second only to safety. Barriers with language and digital access make it especially difficult for older adults and immigrants to navigate complex systems and get the help they need. Beyond the data, we continue to hear fears about ICE activity, confusion over changing immigration rules, and even hesitation to apply for healthcare, out of concern it could affect immigration status. It is clear that community members rely heavily on organizations like Homecrest - to navigate systems, bridge cultural and language gaps, connect to legal services, and most importantly, to feel supported.

We thank the Committee for its leadership and offer two recommendations:

1. Protect and expand funding for community organizations providing immigration legal services and case management for AAPI communities.
2. Establish a regular communication channel with the AAPI RISE Network to share how immigration enforcement is affecting our communities.

Together, we can do more to protect the safety and well-being of Asian New Yorkers. Thank you for the opportunity to testify.



TESTIMONY

New York City Council Committee on Immigration

Oversight – Legal Services for Immigrant New Yorkers

October 28, 2025

Submitted by:

Human Services Council of NY

Introduction

HSC is a coalition of 185+ nonprofit human services providers in New York. Our members provide critical direct services to our city’s children, older adults, immigrants, people experiencing homelessness, people with disabilities, people involved in the justice system, people with mental health needs, and many more.

There have been profound national impacts on communities that provide and receive human services due to federal actions. Rapidly shifting immigration policies have targeted communities with enforcement, detention, and deportation, regardless of legal status or history with the justice system. These actions increase fears and tear communities apart, preventing families from accessing critical services and support networks. This is worsened by a lack of legal representation. According to the [NYIC](#): “60% of not detained immigrants with lawyers win their cases, versus 17% who don’t have legal help. Detained immigrants with legal representation are 10 times more likely to win their cases compared to those who lack counsel.”

Meanwhile, economic crises facing our communities in NYC are skyrocketing—with continuing and rapid increases in the lack of access to affordable and secure housing, food, and other essentials. Human services providers who help mitigate the impacts of these crises also face unprecedented cuts to critical programs, censorship, and politicization of constitutionally protected services. Catastrophic gaps and cuts are still ahead—with immediate and long-term threats to SNAP, WIC, Medicaid, Head Start, Continuum of Care, and more.

These factors have created a polycrisis for New Yorkers, which would be seriously exacerbated by any increased enforcement or military presence in NYC, as has been threatened. City leaders and the human services sector must work closely to prioritize human services and community support, especially legal representation.

Advocacy

1. We support Resolution No. 1014 condemning the administration's use of a federalized national guard to repress free speech and militarize American cities.

2. We support expansion of access to representation for immigrant communities in NYC:

- Expand access to legal representation for all immigrant New Yorkers in need of legal support; according to Comptroller Brad Lander, this could result in an additional 53,000 New Yorkers being able to remain in communities across the state.

3. The City should expand partnerships with human services organizations providing legal services and other critical care:

- Continue to expedite all late payments and resolve contracting issues in City contracts with human services providers to support organizations providing these services;
- Direct City agencies to work with contract holders to identify flexible budgeting and deliverables to expand these services; and
- Prioritize resources for community-based organizations providing human services, especially legal services, in any emergency funding allocations.

4. City leaders should coordinate a comprehensive strategy for meeting the polycrisis through scenario planning and mutual support with nonprofit human services partners, NYS leaders, and other key stakeholders.

Conclusion

In this moment of polycrisis, our neighbors need increased access to human services and community support. New Yorkers do not need military deployments and expanded federal enforcement. The decision to deploy these forces into American cities is an abuse of power and a dangerous federal overreach. It would make NYC less safe for *everyone*. City leaders need to act now and act fast to help us mitigate impacts of the current polycrisis, and prevent actions that would exacerbate crises in our communities.

TESTIMONIAL LETTER TO THE COUNCIL OF THE CITY OF NEW YORK

COMMITTEE ON IMMIGRATION

Hon. Alexa Avilés, Chair

October 28, 2025

I. Introduction

Thank you to Chair Avilés and the Committee on Immigration for the opportunity to provide this testimonial letter. On behalf of Immigrant Justice Corps, my name is Lauren Migliaccio, and I am pleased to provide testimony on: Oversight – Legal Services for Immigrant New Yorkers and thank the Committee for taking the initiative to propose a Resolution condemning the Trump administration's use of a federalized national guard to repress free speech, militarize American cities and carry out his anti-immigrant agenda.

Immigrant Justice Corps (hereinafter “IJC”) is the country’s first and only legal fellowship program dedicated exclusively to meeting the need for high-quality legal assistance for immigrants fighting deportation and seeking a path to lawful status and citizenship. IJC’s goal is for legal representation to lift immigrants out of poverty, by helping them understand their rights, attain lawful status and access to secure jobs, quality health care and life-changing educational opportunities. Founded by the late Judge Robert A. Katzmann of the Federal Second Circuit Court of Appeals, IJC galvanizes the country’s most talented law school and college graduates, places them with premier legal services providers and community-based organizations nationwide, leverages the latest technologies, offers in-depth and ongoing access to substantive as well as professional wellness trainings, and fosters a culture of creative thinking that produces new

strategies to reduce the justice gap for immigrant families, ensuring that immigration status is no longer a barrier to social and economic opportunity.

Now, in our eleventh year, IJC has trained and placed over 500 Fellows in support of our mission to increase both the quantity and quality of immigration legal services. While we are headquartered in New York City, our collective experience is national in scope, with more than a 140 fellows placed at immigration legal service providers in 28 states, and the District of Columbia. IJC is deeply committed to serving immigrant New Yorkers as we have forty-five IJC Alumni serving as staff attorneys, legal supervisors and managing attorneys and over forty of our current Fellows placed with immigration legal service providers in New York City.

II. Support for Condemning the Trump administration's use of a federalized national guard to repress free speech, militarize American cities and carry out his anti-immigrant agenda.

New York City has always been cognizant of the needs of its vibrant but vulnerable immigrant populations. Immigrants add to the creativity, social and economic fabric of this vibrant city. IJC supports the Committee on Immigration's proposed resolution condemning the Trump Administration's use of a federalized national guard troops to repress free speech, militarize American cities and carry out his anti-immigrant agenda. The deployment of federalized National Guard members into cities threaten constitutionally protected freedoms of speech, assembly while undermining due process protections guaranteed to all individuals on American soil.

a. Current Legal Landscape

Immigration enforcement and detention are at an all-time high. Since coming into office, the Trump Administration has put a heavy-handed emphasis on immigration enforcement within the US, with the aim of detaining and removing as many noncitizens as possible. The

Administration has done this with aggressive and punishing policies that severely curtail due process and prevent noncitizens from pursuing paths to legal status. These policies include: ramping up enforcement of removal laws; widening the net of who is subject to mandatory detention; expanding the use of expedited removal; building more detention facilities; requiring the sharing of information between the federal government and state/local governments; denying federal funds for sanctuary cities; permanently or temporarily revoking federal funding for legal orientation and representation programs for immigrants facing deportation , and freezing funding pending review; and hiring more U.S. Immigration and Customs Enforcement (ICE) and CBP officers.¹ These policies have been made possible by the procurement of an additional \$170 billion dollars in funding for immigration and border enforcement and detention facilities.²

The Federal Government has set sky-high enforcement metrics, with ICE field offices instructed to detain 1800 individuals per day nationwide.³ Detention rates have reached unprecedented numbers since President Trump took office, with nearly 60,000 detained, a 50% increase of immigrants detained.⁴ For detentions occurring in and around New York City, ICE reopened the Delaney Hall Facility in Newark, New Jersey, with bed space for 1,000 detainees, despite a stop-work order against ICE granted to the City of Newark on the grounds that ICE was opening the facility without following proper building safety protocols.⁵ ICE has also

¹ Executive Order 14159: Protecting The American People Against Invasion, January 20, 2025, <https://www.whitehouse.gov/presidential-actions/2025/01/protecting-the-american-people-against-invasion/>.

² One Big Beautiful Bill Act, H.R. 1, 119th Cong. (2025), <https://www.congress.gov/bill/119th-congress/housebill/1/all-actions>.

³ Washington Post, Trump officials issue quotas to ICE officers to ramp up arrests, January 26, 2025, <https://www.washingtonpost.com/immigration/2025/01/26/ice-arrests-raids-trump-quota/>.

⁴ “More People Are in Immigration Detention Than Ever Before,” Vera Institute for Justice, October 2, 2025, <https://www.vera.org/news/more-people-are-in-immigration-detention-than-ever-before#:~:text=1.,it%20regularly%20puts%20out%20publicly>.

⁵ CE Statement, ICE expands detention capacity with Delaney Hall Facility in New Jersey, February 26, 2025, <https://www.ice.gov/news/releases/ice-expands-detention-capacity-delaney-hall-facility-new-jersey>; See also

been arresting individuals at the 26 Federal Plaza immigration court in New York City. Routine immigration court hearings are being turned into detention traps, as ICE attorneys request termination of removal proceedings and immigrants are arrested immediately as they exit courtrooms. The immigrants falling victim to indiscriminate arrests are not dangerous criminals, but asylum seekers, often with families and viable fears of returning to their home countries. Detainees are taken to overcrowded cells on the 10th floor, recently called “unconstitutional and inhumane” by a federal district court judge in an order granting a preliminary injunction against the practice.⁶ About half of the 2,300 people detained in New York City between January and June were taken after reporting for scheduled check-ins and court hearings.⁷ Recent reporting on these arrests has revealed the violent tactics used by ICE, separating children from their parents, and throwing women into walls and onto floors to be handcuffed and led away.⁸ As is evidenced by its actions, ICE enforcement in courthouses is inherently problematic and prevents access to justice. Here in New York, we have the benefit of the Protect Our Courts Act (POCA) which prohibits ICE enforcement in or around state courthouses.⁹ On June 12, 2025, the DOJ filed *U.S.A. v. New*

Lauren Due, Mayor Baraka, officials make attempt to get inside Delaney Hall amid ICE detention concerns, News 12, May 6, 2025, <https://newjersey.news12.com/mayor-baraka-officials-make-attempt-to-get-inside-delaneyhall-amid-ice-detention-concerns?emci=ec56b4ca-a62a-f011-8b3d-6045bded8cca&emdi=996e9170-a82a-f0118b3d-6045bded8cca&ceid=938833>.

⁶ District Court Grants Order Prohibiting ICE from Detaining Immigrants in Abusive Conditions at 26 Federal Plaza, American Civil Liberties Union, September 17, 2025, <https://www.aclu.org/press-releases/district-court-grants-order-prohibiting-ice-from-detaining-immigrants-in-abusive-conditions-at-26-federal-plaza>

⁷ Andrew Rice and Paula Aceves, *The Trap at 26 Federal Plaza*, New York Magazine, October 20, 2025, <https://nymag.com/intelligencer/article/26-federal-plaza-nyc-immigration-court-ice-agents-detainments-deportations.html>

⁸ *Id.* See also, NYCLU Condemns Recent ICE Violence at 26 Federal Plaza, October 1, 2025, <https://www.nyclu.org/press-release/nyclu-condemns-recent-ice-violence-at-26-federal-plaza>

⁹ Senate Bill S425A, 2019-2022 Session, <https://www.nysenate.gov/legislation/bills/2019/S425>, codified at NY Judiciary Law §§ 4-a and 212(2)(aa)(i) and NY Civil Rights Law § 28.

York, 1:25-cv-00744 (N.D.N.Y.) seeking, under the Supremacy Clause, to invalidate POCA.¹⁰ This litigation remains pending.

The expanded use of expedited removal has greatly diminished nonimmigrants' ability to have their claims to status heard. Through the Protecting the American People Against Invasion Executive Order, the Trump Administration attempts to use the full scope of expedited removal authority under INA § 235(b)(1)(A)(i) and (ii) (8 U.S.C. § 1225(b)(1)(A)(i) and (ii)) against undocumented individuals present for under two years and found anywhere within the U.S.¹¹ This is in stark contrast to DHS's prior practice, since 2004, of limiting the application of expedited removal to undocumented noncitizens who either arrive at a port of entry or are apprehended within 14 days of their arrival and within 100 miles of an international land border.¹² As a result of the new expedited removal policy, undocumented noncitizens who have continuously resided in the country for fewer than two years are at imminent risk of deportation without any hearing or meaningful review, regardless of their ties to the United States, or the availability of claims for relief from and defenses to removal. Even individuals who are not properly subject to expedited removal (for example, individuals who have been continuously present for more than two years)—or to removal at all (for example, U.S. citizens)—can be summarily removed if they are unable to affirmatively prove those facts to the satisfaction of an immigration officer. For some individuals appearing in immigration court, ICE has been making oral requests for dismissal of removal proceedings, and then rapidly detaining the individual and placing them in “expedited” removal proceedings, in which they do not have the right to a hearing in front of an immigration judge.¹³

¹⁰ *U.S.A. v. New York*, 1:25-cv-00744 (N.D.N.Y.), <https://www.justice.gov/ag/media/1403571/dl>.

¹¹ Executive Order 14159: Protecting The American People Against Invasion at § 9, January 20, 2025, <https://www.whitehouse.gov/presidential-actions/2025/01/protecting-the-american-people-against-invasion/>.

¹² See prior policy, Designating Aliens For Expedited Removal, 69 Fed. Reg. 48877, 48880 (2004), <https://www.govinfo.gov/app/details/FR-2004-08-11/04-18469>.

Jason Houser, who was chief of staff at ICE during the Biden administration, says this tactic of dismissing cases and then arresting people whose cases were dismissed “targets vetted migrants who were working and had legal status¹³“Flooding the system with thousands of noncriminals wastes time and resources when federal law enforcement should be focused on national security threats.”¹⁴

As the final piece of the anti-immigrant puzzle, ICE has expanded who is subject to mandatory detention, and severely limited who is eligible for release from detention on bond following an immigration arrest. In a July 2025 memo, Todd Lyons, acting director of ICE, issued a guidance memorandum stating that anyone not formally admitted to the US would be subject to mandatory detention, without the opportunity to seek release bond.¹⁵ This reasoning was subsequently adopted by the BIA in *Matter of Q. Li* and *Matter of Yajure Hurtado*, effectively stripping bond eligibility from anyone present in the U.S. without inspection and admission, subjecting them to mandatory detention and horrible detention conditions.¹⁶

Individuals detained in New York are often transferred to ICE jails in Louisiana or Texas, far from their families, support networks, and – if represented – from their legal counsel, and given that detention makes it much harder to seek representation, prepare witnesses, gather evidence,

¹⁴ *Id.*

¹⁵ ICE Memorandum, Interim Guidance Regarding Detention Authority for Applications for Admission, AILA Doc. No. 25071607 (July, 8 2025), <https://www.aila.org/library/ice-memo-interim-guidance-regarding-detentionauthority-for-applications-for-admission>.

¹⁶ *Matter of Q. Li*, 29 I&N Dec. 66 (BIA 2025), <https://www.justice.gov/eoir/media/1400431/dl?inline>; *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025), <https://www.justice.gov/eoir/media/1413311/dl?inline>.

and otherwise establish eligibility for the immigration benefit being sought, ICE arrests in immigration court undermine due process.¹⁷

b. The Trump Administration is Targeting Sanctuary Jurisdictions

Since coming into office, President Trump has made good on his promise to target Sanctuary Jurisdictions.¹⁸ The Deputy Acting Attorney General's January 21, 2025, memorandum Interim Policy Changes Regarding Charging, Sentencing, and Immigration Enforcement directs the establishment of a Sanctuary Cities Enforcement Working Group, to target cities, like New York City, with sanctuary policies limiting cooperation with federal immigration enforcement.¹⁹ Similarly, the Protecting American Communities from Criminal Aliens EO directs the Attorney General and DHS Secretary to publish a list of state and local sanctuary jurisdictions, after which federal agencies are to identify for suspension or termination any federal grants and contracts benefiting such jurisdictions.²⁰ The Protecting the American People Against Invasion EO also directs the restriction of federal funds for sanctuary cities which would directly impact New York.²¹

¹⁷ Gabrielle LaMarr LeMee, How ICE detainees are moved miles away from families and attorneys, September 26, 2025, <https://www.latimes.com/politics/story/2025-09-26/faster-more-frequent-transfers-of-immigrant-ice-detainees-sow-fear-and-cut-off-resources>

¹⁸ Tim Henderson, Trump administration vows to 'come after' sanctuary states and cities, despite court setbacks, August 19, 2025, <https://stateline.org/2025/08/19/trump-administration-vows-to-come-after-sanctuary-states-and-cities-despite-court-setbacks/>

¹⁹ Acting Deputy Attorney General Emil Bove Memorandum, Interim Policy Changes Regarding Charging, Sentencing, and Immigration Enforcement, January 21, 2025, <https://static.politico.com/66/35/5a5563a1441faa1680058a5a3d1b/memorandum-from-the-acting-deputy-attorneygeneral-01-21-2025.pdf>.

²⁰ Executive Order 14287: Protecting American Communities from Criminal Aliens, April 28, 2025, <https://www.whitehouse.gov/presidential-actions/2025/04/protecting-american-communities-from-criminal-aliens/>.

²¹ Executive Order 14159: Protecting The American People Against Invasion, January 20, 2025, <https://www.whitehouse.gov/presidential-actions/2025/01/protecting-the-american-people-against-invasion/>.

The Trump Administration has ordered National Guard troop presence in response to public demonstrations against ICE enforcement. On June 9, 2025, 4,000 National Guard troops began entering Los Angeles, as well as 700 Marines.²² Moreover, President Trump floated the idea of invoking the Insurrection Act to use military force there, domestically. On October 3, 2025, President Trump sought to deploy National Guard troops to Portland, Oregon.²³ He also sought to deploy National Guard troops to Chicago, Illinois.²⁴ After the deployment to Portland was enjoined by a federal district court, President Trump reiterated the idea of invoking the Insurrection Act, just days after suggesting to U.S. generals that American cities should be military training grounds.²⁵

Furthermore, we have seen large-scale ICE raids in cities across the US, including Chicago, New York, San Francisco, and Atlanta. There are increasing patrols by masked, armed agents; warrant-less arrests and detentions that have led to unlawful arrests of US citizens.

As stated in the New York City Bar's Report on the Trump Administration's 2025 Changes to Immigration Law, "the new administration's actions amount to a radical dismantling of the U.S. immigration system. The EOs and rules changes subject essentially all U.S. residents who are not citizens to potential harassment, detention and/or deportation. In many cases, the Administration's actions will result in the inability of individuals to pursue rightful claims to enter or remain in the

²² Sam Levin and Edward Helmore, LA protests: Trump sends thousands more troops in 'authoritarian' move, The Guardian, June 10, 2025, <https://www.theguardian.com/us-news/2025/jun/09/los-angeles-protests>.

²³ Alicia Victoria Lozano, Trump administration activates 200 National Guard troops to Portland, NBC News, October 3, 2025, <https://www.nbcnews.com/news/us-news/portland-fears-violence-national-guard-deployedrcna235047>.

²⁴ Daniel Michael Lamb, Here are the facts on Trump's orders to send troops to Portland and Chicago, CBC, October 6, 2025, <https://www.cbc.ca/news/world/portland-chicago-ice-trump-troops-national-guard-1.7652360>.

²⁵ Zoe Richards, Trump floats invoking the Insurrection Act, NBC News, October 6, 2025, <https://www.nbcnews.com/politics/donald-trump/trump-floats-invoking-insurrection-act-rcna236030>. See also, Bernd Debusmann Jr and James FitzGerald, US cities should be military training grounds, Trump tells generals, BBC, September 30, 2025, <https://www.bbc.com/news/articles/cvgq044n72po>.

United States. Given that nearly 40% of New York City’s population are immigrants, these actions have a significant adverse impact on our city.”²⁶

III. Immigrant Justice Corps Proposes Increased Access to Legal Services for New Yorkers

As our vulnerable immigrant communities come under attack and demand for legal services at an all-time high, access to high quality legal services has never been more important. Beginning September 2025, there are 3.4 million pending immigration cases.²⁷ Despite data demonstrating that having an attorney makes a dramatic difference significant numbers of immigrants lack representation. For cases initiated in FY2024, only 21% had representation.²⁸ The dramatic transformation of the US enforcement and deportation system has led to attorneys and advocates facing compounding challenges with pressures to manage rapidly moving cases in courts and responding to crisis as they arise in communities, all with significantly reduced resources and staffing Without increased access we risk leaving large swaths of the immigrant population unrepresented or under-served. The city is uniquely positioned to support free or low-cost services, community-based outreach, ensure language access, and coordinate across neighborhoods.

The most prudent solution to this ever-growing need is to build capacity with non-lawyer immigrant advocates, such as Department of Justice Accredited Representatives and Immigrant Justice Corps Community Fellows. Licensed attorneys alone cannot meet the scale of need. Non-lawyer advocates—such as those accredited by the U.S. Department of Justice’s Office of

²⁶ Hasan Shafiqullah, Trump Administration’s 2025 Changes to Immigration Law, New York City Bar, October 10, 2025, <https://www.nycbar.org/wp-content/uploads/2025/03/20221419-TrumpAdminChangesImmigrationLaw.pdf>

²⁷ Transactional Records Access Clearinghouse <https://tracreports.org/immigration/quickfacts/eoir.html>

²⁸ *Id.*

Legal Access Programs (OLAP) — can provide vital services: prepare forms, attend interviews, support clients through proceedings.²⁹ Non-lawyer advocates often come from the communities they serve, speak the languages of their communities, and share cultural backgrounds, all of which is invaluable to building long-lasting and trusting relationships. They can deliver culturally competent services, in neighborhood settings, at lower cost than attorneys. Non-lawyer advocates working under recognized organizations also provide a safeguard against predatory “notario” fraud and poor-quality representation.³⁰ By using non-lawyer advocates for screening, application assistance, and less-complex services, attorneys can focus on the most complex cases, including removal defense and habeas petitions. This layered model increases overall access and improves efficient use of resources.

DOJ Accredited Representatives and IJC Community Fellows are best situated to provide invaluable non-legal services during this critical time, including Know Your Rights (“KYR”) Trainings, Friend of Court (“FOC”) accompaniment, and Rapid Response support. KYR trainings are essential because many immigrants may not realize their rights in encounters with law enforcement or immigration officials, their rights when detained, or the possibilities of relief or lawful status. Trainings equip people with information to act proactively, avoid traps, assert rights, and not miss critical deadlines or appointments. Having a basic understanding of one’s rights can make a significant difference in how a person navigates immigration encounters, potentially preventing violations of constitutional and civil rights.³¹ Officials of the current administration

²⁹ Recognition & Accreditation (R&A) Program, Executive Office of Immigration Review, U.S. Department of Justice, <https://www.justice.gov/eoir/recognition-and-accreditation-program>

³⁰ The Basics of DOJ Accreditation, Catholic Legal Immigration Network, November 2024, <https://www.cliniclegal.org/file-download/download/public/76367>

³¹ Micaela McConnell, With Liberty and Justice for All: The Importance of Know Your Rights Education, American Immigration Council, March 21, 2025, <https://www.americanimmigrationcouncil.org/blog/the-importance-of-know-your-rights-education/>

have attempted to discredit “Know Your Rights” education by portraying it as subversive or a tool for evading law enforcement. Tom Homan, President Trump’s “border czar,” stated that immigrants are “very difficult to arrest” when they are “educated” about their rights.³² This kind of messaging is very concerning, because it is of course not illegal to inform people of their rights, and reiterates why this work is so important.

Legal intervention is critical when enforcement actions, raids or detentions occur. “Friend of Court” and rapid response legal services, such as hotlines and clinics, are essential to ensure that people know where to turn and get legal assistance quickly, rather than being left to navigate alone. “Friend of the Court” in immigration services refers to an individual or organization that assists an immigration court by providing information or expertise to a person representing themselves pro se. These services help individuals understand their rights and the proceedings but do not tie up limited resources as the FOC is not acting as a party's legal representative. Programs like the “Friend of the Court” initiative offer legal orientation, consultation, and referrals to help navigate the immigration system, especially for vulnerable individuals like unaccompanied children.³³ Rapid response initiatives are equally important for community safety and offer critical tools for immigrant defense. They function as community-led networks that provide legal, logistical, and emotional support to individuals facing immigration enforcement. These initiatives also collect information on enforcement actions, which can be used to challenge practices,

³² Liam Archaki, Trump Border Czar Rages About Migrants Being Too ‘Educated’ About Rights in ICE Round-Ups, Daily Beast, January 28, 2025, <https://www.yahoo.com/news/trump-border-czar-rages-migrants-230433077.html>

³³ Family Group Legal Orientation Program, Acacia Center for Justice, <https://acaciajustice.org/what-we-do/family-group-legal-orientation-program/#:~:text=Pro%20se%20workshops%20allow%20immigrants,and%20their%20rights%20and%20obligations.>

advocate for policy changes, or hold agencies accountable. Educated and passionate service providers are instrumental in the success of these programs.

IV. Immigrant Justice Corps Response to Aggressive Federal Actions

a. IJC is increasing practical support for providers in crisis take on complex matters

In partnership with the Mayor's Office of Immigrant Affairs (MOIA), IJC is launching a series of professional development and training opportunities to strengthen the capacity of New York City's immigration legal community at this critical time. The centerpiece of this initiative is the Special Immigrant Juvenile Status (SIJS) Training Series. This virtual program, beginning October 29, 2025, is designed to equip attorneys with the practical and procedural skills needed to effectively represent child clients pursuing SIJS throughout the stages of their case. The curriculum will begin with training on working with child clients and progress through topics such as New York Family Court practice, SIJS filings with USCIS, and adjustment of status before USCIS or EOIR.

This initiative is especially relevant and urgent for New York City right now, as the city faces an unprecedented demand for immigration legal services, particularly for children, families, and asylum seekers navigating complex legal systems. Thousands of newly arrived migrant youths are entering New York's schools and communities, many of whom may be eligible for SIJS but lack access to informed, qualified legal representation. SIJS offers a crucial pathway to stability and protection for immigrant children who have been abused, neglected, or abandoned by one or both parents, yet the process requires navigating both state family courts and federal immigration systems, an intersection that often overwhelms advocates and overburdened service providers. By building expertise in this area, the IJC's training directly

supports the city's broader commitment to safeguarding vulnerable youth and ensuring due process.

In addition to the SIJS series, IJC is offering several complementary programs to enhance practitioner readiness and promote high-quality representation citywide. The Asylum Moot & Training allows participants to submit redacted asylum applications for moot review and schedule a two-hour training tailored to their organization, either virtually or in person. The Moot Court Corner: Office Hours offers a space for practitioners to practice and troubleshoot upcoming USCIS interviews, EOIR hearings, or family court appearances with guidance from IJC experts. Finally, the Immigration-Focused Ethics Hotline provides confidential, practice-oriented guidance on issues such as dual representation, client capacity, and confidentiality across agencies. Together, these initiatives establish a comprehensive and responsive framework to New York City's evolving immigration landscape, by empowering legal professionals, expanding access to justice, and strengthening the city's overall legal infrastructure to more effectively serve immigrant communities.

Respectfully submitted,

Immigrant Justice Corps



Korean American Family Service Center (KAFSC)'s Testimony

Good afternoon Chair Avilés and Council Members,

My name is Jeehae Fischer, and I am the Executive Director of the Korean American Family Service Center, or KAFSC. For more than 36 years, KAFSC has supported immigrant survivors of gender-based violence and their families to rebuild lives free from abuse, fear, and isolation. We are also a proud member of The Collective, a coalition of culturally specific, community-based organizations serving immigrant survivors across New York City.

I am here to express KAFSC's full support for Resolution 1014, which condemns the use of a federalized National Guard to repress free speech, militarize American cities, and advance an anti-immigrant agenda. This kind of action spreads fear, retraumatizes families, and undermines the sense of safety that our city has worked so hard to build.

At KAFSC, we witness how this fear shows up in people's daily lives. One of our clients—a single mother who left an abusive relationship—recently found a good job as a nail technician in Manhattan. But fearing for her safety while commuting across boroughs, she left that job. Now, unable to find work near her home in Queens, she faces eviction. Her story shows how fear and instability can quickly undo the progress survivors fight so hard to achieve.

To meet these rising challenges, KAFSC provides comprehensive immigration legal services—including VAWA self-petitions, U visas, adjustment of status, and family reunification. With a full-time family and immigration law attorney on staff, we are seeing a surge in requests for help from families seeking safety, stability, and protection from deportation or exploitation. The demand far exceeds our current capacity.

That is why continued and sustained City investment in community-based, culturally specific legal and social services is essential. The Citywide Legal Services for Low-Income Immigrants initiative demonstrated how powerful this approach is when trusted organizations like KAFSC, Womankind, and VIP can respond to survivors with both expertise and cultural understanding.

We urge the Council to reaffirm this commitment and ensure New York City continues to stand as a place of safety, dignity, and justice for all immigrants, especially in the face of fear and division.

Thank you for your leadership and the opportunity to testify today.



**Oversight – Legal Services for Immigrant New Yorkers
Committee on Immigration
New York City Council**

October 28, 2025

Dear Members of the Committees on Immigration:

Kids in Need of Defense (KIND) respectfully provides the following written testimony for the New York City Council on the October 28, 2025, oversight hearing on legal services for immigrant New Yorkers.

Founded in 2008, KIND is a 501(c)(3) nonprofit organization providing legal representation at no cost to unaccompanied immigrant children who enter the U.S. immigration system alone. In all of KIND's work, KIND envisions a world in which every unaccompanied child on the move has access to legal counsel and has their rights and well-being protected as they migrate alone in search of safety. Through 16 offices across the United States, KIND provides direct legal representation, pro bono mentoring, and social services coordination for unaccompanied children at no cost to our clients. Since 2009, KIND's New York City office has served unaccompanied children in all five boroughs.

KIND's holistic approach helps to address the trauma and critical needs of our child clients, improving the overall well-being of youth by fostering resilience and establishing better child-centered practices. KIND's Social Services Team works with our Legal Programs Team to connect KIND's young clients to needed resources to foster their safety and stability and help children and their families adjust to a new country, language, home, and community.

1) Unaccompanied children require attorneys to fight removal proceedings and pursue immigration legal status

A child is considered "unaccompanied" if they enter the U.S. before the age of 18 without a parent or a legal guardian and without any lawful status. Most unaccompanied children have left their home countries fleeing violence, persecution, neglect, or abandonment. They often suffer high levels of trauma due to exposure to violence, persecution, death threats, physical and sexual assault, and trafficking that may occur in the home country, en route to the U.S., or upon release into the community. While some unaccompanied children remain in the custody of the Office of Refugee Resettlement (ORR), most are released to family members or other adult sponsors who care for them, at no cost to the government, for the duration of their immigration process.

New York City is a top receiving destination nationally for unaccompanied children. In FY24 and FY25 alone, more than 4,000 unaccompanied children were released to sponsors in Bronx,

Kings, New York, Queens, and Staten Island Counties.¹ In each of the last five years, New York State has ranked as the fourth highest receiving state of unaccompanied children.²

After arriving, unaccompanied children undergo removal (deportation) proceedings in federal immigration court, where they have the opportunity to present an argument against their deportation. There is no right to guaranteed counsel at government expense in immigration matters, and most unaccompanied children cannot afford to hire private attorneys. Though there is some federal funding for representation of unaccompanied children, it is not enough to meet the need, and many, if not most unaccompanied children, go without a lawyer. Immigration law is a complex and technically demanding area of practice with rapidly evolving federal court practice, regulations, and laws. In this landscape, immigration legal representation for unaccompanied children is more important than ever.

2) The need for immigration legal services funding is more acute than ever

New York City, like many cities around the country, has seen a rapid and aggressive increase in federal immigration enforcement actions across the city. Immigrants of all ages, including unaccompanied children, are facing increased risk of arrest and detention while participating in daily activities and even when participating in their immigration legal cases by appearing in court or attending appointments with Immigrations and Customs Enforcement (ICE) or U.S. Citizenship and Immigration Services (USCIS).

Additionally, the Department of Homeland Security (DHS) and USCIS have undertaken initiatives and adopted restrictive policy changes focused specifically on unaccompanied children and their sponsors. This month, DHS unveiled an program seeking to incentivize unaccompanied children to “voluntarily” return to their countries of origin and permanently relinquish key rights under federal law in exchange for a post-departure payment of \$2,500.³ This type of initiative underscores the importance of counsel for children to understand their rights and navigate an increasingly complex process. It is the latest of a host of measures implemented over the last year that have targeted and threatened unaccompanied children and their sponsors including: restrictive sponsor applications requirements that essentially bar children’s release from government custody; the elimination of deferred action for Special Immigrant Juveniles, a critical pathway to safety for immigrant survivors of parental abuse; and enforcement-focused home visits to children and their sponsors that spread fear.⁴ Moreover, the Administration has removed key safeguards around the treatment of children’s cases in

¹ U.S. Department of Health & Human Services, Office of Refugee Resettlement, “Unaccompanied Children Released to Sponsors by County,” accessed October 17, 2024, available at <https://acf.gov/orr/grant-funding/unaccompanied-children-released-sponsors-county>.

² U.S. Department of Health & Human Services, Office of Refugee Resettlement, “Unaccompanied Children Released to Sponsors by State,” accessed October 17, 2024, available at <https://acf.gov/orr/grant-funding/unaccompanied-children-released-sponsors-state>.

³ Priscilla Alvarez, “Trump administration prepares to offer money to unaccompanied migrant teenager to voluntarily leave US,” CNN, October 3, 2025, <https://www.cnn.com/2025/10/03/politics/unaccompanied-migrant-kids-payments>.

⁴ See generally, “A Timeline: Tracking How the Second Trump Administration is Rolling Back Protections for Unaccompanied Children,” Kids in Need of Defense, October 2025, https://supportkind.org/wp-content/uploads/2025/10/25_Trump-Admin-Rollbacks-Timeline.pdf

immigration court, making it even more difficult for children to participate in their immigration processes without an attorney.

At the same time, the Administration has moved to eliminate federal funding for immigration legal services. In March, the government terminated the federal legal services contract serving unaccompanied children, upending representation for thousands of children, including 700 KIND clients in New York. Several organizations filed a lawsuit challenging the cancellation, which remains ongoing.⁵ The government then re-negotiated and restored funding for a limited period, through October 2025, with the option to reevaluate in three-month increments through July 2026. Organizations, including KIND, have taken steps to bridge this gap and prepare for future funding loss while sustaining our work. New York City's Unaccompanied Minors and Families Initiative has enabled KIND and other legal service providers to continue our legal representation despite the uncertainty of the federal contract.

3) New York City's Unaccompanied Minors and Families Initiative is providing a critical service

The provision of high quality legal and social services is a key component of ensuring immigrant children can achieve stability and thrive in their new homes. For example, through the Unaccompanied Minors and Families Initiative, KIND represents Omar, a 15-year-old from El Salvador currently living with his mom in Nassau County. Before leaving El Salvador, Omar complained to his father about persistent pain throughout his body, but he was never taken to see a doctor. After arriving in the United States and while still in the care of the Office of Refugee Resettlement (ORR), Omar was taken to a doctor and diagnosed with cancer, which had been the undiagnosed source of his pain. Now reunited with his mom, he has completed chemotherapy treatments and is on the path to recovery. His pro bono legal team is assisting him with applying for Special Immigrant Juvenile Status (SIJS) in order to remain safely in the U.S. and continue his recovery. He is working hard in school as he undergoes treatment and is looking forward to studying computer science in college.

KIND has been a partner of the Unaccompanied Minors and Families Initiative since 2020. The funding has enabled us to serve nearly 250 young people with legal screenings, legal representation, and social services. With the growth of the program in FY26, KIND will be able to serve more children in the coming year. The program allows KIND's New York City office to maintain our service delivery despite uncertainty of other funding streams and in the face of increasing enforcement and harmful policies targeting unaccompanied children in our communities.

The increased intensity and prevalence of enforcement actions in New York City has had a profound impact on our clients and their families. In just the past week, one client was arrested during a federal raid and another during a routine traffic stop. These incidents have created an atmosphere of fear and uncertainty - children are afraid to go to school, and families are increasingly hesitant to come to our office to meet with their legal representatives. Increased ICE enforcement makes children's immigration legal cases even more complex and time consuming,

⁵ Community Legal Services in East Palo Alto, et al. v. United States Department of Health and Human Services, et al., 25-2808, (9th Cir.)

as attorneys explain new risks, accompany children to ICE check ins, and monitor risk of detention.

New York City is a leader in ensuring that unaccompanied children residing in New York City have the opportunity to thrive in the city. Thank you for your efforts to provide these life saving services and meet the unique needs of unaccompanied children in our community. We urge you to continue to keep the needs of immigrant children and youth central in your efforts by continuing to robustly support the Unaccompanied Minors and Families Initiative and fostering the valuable partnership between the City and service providers. Thank you.

Sincerely,

Kids in Need of Defense (KIND)

/s/

Marilia Richards

Managing Director, New York City

mrichards@supportkind.org

Korean Community Services of Metropolitan New York, Inc. (KCS)

203-05 32nd Avenue, Bayside, NY 11361

Tel: (718) 939-6137 | Email: immigration@kcsny.org

Date: October 27, 2025

To: New York City Council, Committee on Immigration

Re: Oversight – Legal Services for Immigrant New Yorkers / T2025-4224

Dear Council Members,

Thank you to the New York City Council Committee on Immigration for holding this important hearing and for the opportunity to testify.

Since 1973, KCS has been a trusted community-based organization serving immigrant New Yorkers—particularly Korean Americans and other AAPI residents—through health, social services, workforce development, and legal assistance. In 2022, KCS established its Immigration and Legal Services Department, expanding from assisting with a few basic immigration forms to now offering comprehensive legal services covering more than 25 immigration applications, along with matters related to domestic relations, employment, housing, bankruptcy, wills & trusts, and criminal defense.

Over the past year, KCS has supported approximately 200 in-person cases and over 800 phone consultations, and hosted more than 10 community legal education forums such as Know Your Rights and immigration workshops.

Recently, we have witnessed growing fear and confusion among immigrants following reports of federal enforcement actions. This anxiety has been particularly visible within the Korean community after incidents such as the Georgia factory raid involving Korean nationals. As a result, some immigrant families in New York are now reluctant to access community services or legal assistance, fearing that doing so could somehow place them at risk.

KCS has encountered clients struggling to maintain employment or renew work authorization due to delays in processing by federal agencies. Some DACA recipients and individuals with pending green card renewals have faced serious hardship because of document verification issues, leading to job loss and instability.

Others hesitate to travel abroad—even when legally permitted—due to uncertainty about reentry, leaving them isolated from family members during times of crisis.

For KCS and many other community organizations, this growing fear creates barriers to essential services:

- Clients are hesitant to visit nonprofit offices for legal or social support.
- Critical immigration services—such as renewals or naturalization—are being delayed or avoided.
- Misinformation spreads quickly, eroding community trust.

Therefore, KCS respectfully requests that the City Council:

1. Reaffirm New York City's status and principles as a welcoming city for immigrants, ensuring that all residents can safely access essential services.
2. Expand multilingual public education and outreach to help immigrant communities receive accurate, timely information.
3. Strengthen partnerships between city agencies and trusted community-based organizations (CBOs) such as KCS to promote collaboration and transparency.
4. Provide clear protocols and communication channels for nonprofit organizations to follow in the event of enforcement activity near community facilities.

KCS remains fully committed to serving and protecting our community. We stand ready to work with the City to ensure that immigrant New Yorkers continue to live with safety, dignity, and access to essential services.

Thank you for your time and leadership.

Respectfully submitted,

Korean Community Services of Metropolitan New York, Inc.



**Testimony of Christine Clarke Before
NYC Council, Committee on Immigration
Regarding Immigration Legal Services
October 27, 2025**

My name is Christine Clarke, I am the Chief of Litigation and Advocacy at Legal Services NYC. We thank the Committee for offering us this chance to testify about the desperate need for civil immigration legal services, particularly at this time of extreme anxiety amid an ongoing federal assault on immigrants.

Legal Services NYC is the largest provider of civil legal services in the country, providing free civil legal services benefiting over 100,000 low-income people in New York City each and every year. Indeed, we handle well over 5,000 immigration legal services cases every year for clients all over the City, including representation in affirmative and defensive asylum cases from application to hearing, obtaining immigration relief for victims of domestic violence and other crimes, and helping our clients obtain work authorization, permanent resident status, and ultimately U.S. citizenship.

I know the Committee is well aware of the threats facing immigrant New Yorkers right now, with people being kidnapped off the streets each and every day. I know that this Committee knows that New Yorkers are living in fear, with children afraid to go to school and parents afraid to go to work, let alone to immigration court proceedings to obtain legal status to which they are entitled by law. Right now, New York City residents are being underfed and mistreated in immigration detention centers all over the country, deprived of contact with friends or family, and often deprived of basic medical treatment or other humanitarian necessities.

Now more than ever, New York City's immigrant population needs immigration lawyers for cases that are more complex than they've ever been, with almost unimaginable stakes in every case. And yet, the City's immigration contracts continue to pay *far* below what is required to provide minimum necessary services. **Going into the Trump administration, the City already required nonprofit legal services providers to subsidize fifty cents of every dollar received under the Immigrant Opportunity Initiative.**

Now, not only do asylum cases take years on end to resolve, but every case brings with it the substantial possibility that our client will be disappeared into the ICE system without notice and without process. As responsible providers, we must prepare *all of our clients* for this possibility—drafting papers, counseling people on what to expect, helping with family preparedness, and so much more. With the underlying work still not fully funded, this extra work

Demand Justice.

is going uncompensated. Moreover, when our clients *do* get detained, we must gather enormous resources to try and secure their Constitutional rights to due process and have them released. That work, too, is going fully unfunded.

As I am sure you are aware, many law firms have chosen to tread lightly in the face of threats from this federal administration, and thus it is harder than ever to obtain pro bono legal assistance to help us in these fights. Other sources of federal funding are similarly coming under threat. We are forever being asked to do more, with less and less at our disposal.

We know that the City Council fought for providers to receive more money in the most recent IOI RFX, but an extra \$3M for providers citywide is not enough to even cover the pre-existing shortfall in funds, let alone sufficient to cover this extra work.

Moreover, the Office of Civil Justice adjusted the RFX to require that the work *most severely underfunded*—full representation litigation—constitute the lion's share of the work for all contractors. The work of preparing families for potential separate is relegated to little more than a footnote in the contract. The work of community education—the crucial work of telling communities what is happening and how to protect their legal rights—is going unfunded entirely.

This work requires funding and it requires the flexibility to allow providers, the experts in the field every single day working with families going through some of the worst times in their lives, to respond quickly to rapidly changing laws and policy, allocating resources where they are needed as efficiently as possible.

We at Legal Services NYC are committed to fighting for low-income New Yorkers, no matter where they come from, and we will stand up for our clients, our neighbors, and our communities. But we cannot fight this tide of xenophobia and racism alone, we need the full partnership of the City government. We need the City to provide flexible funding of an additional **\$9.5 million** allocated to the IOI contracts. Providers also needed **dedicated funding for emergency federal habeas corpus litigation**. Our Constitutional rights to be free from detention without due process of law is meaningless without attorneys to enforce those rights against the federal government.

I thank you for the opportunity to provide this testimony.

Respectfully Submitted,

Christine Clarke
Chief of Litigation and Advocacy
Legal Services NYC
cclarke@lsnyc.org

Mixteca Testimony

Good afternoon Council Members,

Thank you for the opportunity to testify today. My name is Alejandra Aragon , and I am a Community Advocate at **Mixteca**, a community-based organization in Sunset Park that has served the immigrant community for over two decades. I'm here along with my compañeras to represent a perspective of small size community based organizations.

At Mixteca, we offer a range of social and legal support services to immigrant families. Today, I am here to speak on behalf of the immigrant community we serve – individuals and families navigating incredibly complex and stressful legal processes. Many of them have upcoming court hearings, ICE check-ins, and pending USCIS applications, and they urgently need access to quality legal representation – especially under the current administration, when fear and uncertainty have grown.

Since January 2025, our small but dedicated team has assisted approximately 700 community members seeking help with asylum applications, work permits, changes of venue and address, and motions related to internet-based hearings. Yet, in our immigration department, there are only two staff members – including myself – working tirelessly to meet this immense demand.

Our community's needs are growing every day, and we continue to do everything we can with the limited resources available to ensure that no one faces these life-changing processes alone.

I would like to share the successful stories that a community member shared with us on how our services being free at no cost has impacted their life. "Excellent service and unconditional support: I want to express my sincere gratitude to the Mixteca organization for their invaluable help and support throughout my asylum application process, work permit, and legal advice. From the moment I first contacted them, they provided me with personalized and professional attention that made me feel safe and supported. I seeked other places but they were asking me to pay hundreds of dollars just to get assistance. Mixteca's team was very efficient and dedicated in guiding me through every step of the process, clearly explaining the requirements and procedures at no cost!. Their knowledge and experience in asylum and human rights are truly impressive. Thanks to their help, I was able to navigate a complex system and achieve positive results so far in my case. I feel very fortunate to have found this organization and highly recommend their services to anyone who needs assistance with immigration and asylum-related issues.

We urge you to support organizations like Mixteca that continue to stand with immigrant New Yorkers.

Thank you for your time and your commitment to justice.



**WRITTEN TESTIMONY
BY THE IMMIGRATION AND NATIONALITY LAW COMMITTEE**

**HEARING OF THE NEW YORK CITY COUNCIL
COMMITTEE ON IMMIGRATION**

OCTOBER 28, 2025

OVERSIGHT: LEGAL SERVICES FOR IMMIGRANT NEW YORKERS

**CHRONIC PAYMENT DELAYS TO NONPROFIT LEGAL SERVICE PROVIDERS
THREATENS THE CITY'S ABILITY TO PROVIDE INDIGENT FAMILIES WITH
SOCIAL SERVICES, A SITUATION FURTHER AGGRAVATED BY THE
ELIMINATION OF CITY-FUNDED LEGAL CLINICS
WITHOUT A CONTINGENCY PLAN**

The Immigration and Nationality Law Committee of the New York City Bar Association (City Bar) is pleased to provide this written testimony on the topic of "Oversight: Legal Services for Immigrant New Yorkers," for the New York City Council Committee on Immigration.

Founded in 1870, the City Bar has a longstanding mission to equip and mobilize the legal profession to practice with excellence, promote law reform, and advocate for access to justice. With over 20,000 members, the City Bar is an important voice in the legal profession in New York City and beyond. The Immigration and Nationality Law Committee addresses diverse issues pertaining to immigration law and policy. Our members include staff of legal services organizations, private immigration attorneys, judges, staff of local prosecutor's offices, employees of government immigration agencies, academics, and law students. We submit this testimony based on our collective expertise and the experience of our clients.

Over the past year, nonprofit legal providers have faced mounting challenges that threaten this City's ability to serve immigrant families who depend on nonprofit legal services for life-changing representation. In November 2024, fourteen organizations representing the largest coalition of nonprofit legal service providers in New York City called on the Adams Administration to address chronic payment delays that made it difficult or impossible for their organizations to continue providing essential services to New Yorkers in need. The letter demanded that the City "act by immediately allocating additional advances on housing and immigration contracts and addressing other payment issues that jeopardize their ability to operate."

About the Association

The mission of the New York City Bar Association, which was founded in 1870 and has over 20,000 members, is to equip and mobilize a diverse legal profession to practice with excellence, promote reform of the law, and uphold the rule of law and access to justice in support of a fair society and the public interest in our community, our nation, and throughout the world.

These organizations are crucial in ensuring access to justice for indigent New Yorkers, who rely on their services to navigate the legal complexities of eviction defense, immigration and deportation proceedings, and social services. However, as detailed in the November 13 letter and in the press, the City's ongoing payment delays have put many of these service providers in a financially perilous situation, threatening their capacity to continue serving our most vulnerable populations.

The New York City Bar Association joined legal service providers and City leaders urging the administration to address the chronic payment delays.¹ To date, the issue persists with an aggravating factor: the elimination of city-funded pro se legal clinics. The elimination of the City's pro se immigration legal clinic, the Asylum Application Help Center (AAHC), has further exacerbated this crisis. The AAHC helped numerous shelter residents prepare bare-bones Form I-589 asylum applications on the understanding that the applicants would be able to bolster their filings before their individual hearings. However, changes in federal immigration policy have imperiled that strategy. On April 11, 2025, EOIR issued Policy Memorandum (PM) 25-28, *Pretermission of Legally Insufficient Applications for Asylum*, encouraging immigration judges to pretermite asylum applications that may be legally insufficient.²

Together, these developments have led to an increase in pretermitted asylum applications—particularly among pro se individuals who submitted bare-bones applications, such as those prepared through the AAHC for shelter residents. Although these applications helped individuals meet the one-year filing deadline, they are now at risk of being summarily pretermitted, placing them in grave danger of removal orders at their master calendar hearings, with the consequent risk of immediate detention and deportation.

To remedy the problem created by the AAHC's limited assistance, the City should partner with legal services to provide follow-up appointments to the individuals it previously assisted. These appointments would allow applicants to strengthen their asylum cases with detailed personal statements, well-articulated particular social groups, corroborating evidence, country conditions reports, and other essential elements of a fully developed, meritorious asylum claim. Without this follow-up support, many of the individuals who sought help through the AAHC could face removal despite having viable claims for protection.

Nonprofit legal service providers are essential partners in the effort of ensuring that New Yorkers live dignified lives and have access to the services they need. For these partnerships to be effective, the City must significantly invest in legal services and address the arrears. The consequences of late payments are far-reaching. Service providers may be forced to reduce their caseloads, resulting in a backlog of cases that could lead to more evictions, higher risks of immigration detention and deportation, and further instability for already vulnerable communities.

¹ New York Bar Association, Statement Urging the Adams Administration to Address Chronic Payment Delays to Nonprofit Legal Services Providers (January 17, 2025), <https://www.nycbar.org/reports/statement-urging-the-adams-administration-to-address-chronic-payment-delays-to-nonprofit-legal-services-providers/?back=1> (All websites last accessed on Oct. 30, 2025).

² See Sirce Owen, EOIR PM 25-28 (Apr. 11, 2025), [link](#). EOIR PM 25-28 was then bolstered by two BIA decisions: *Matter of C-A-R-R-*, 29 I&N Dec. 13 (BIA 2025), [link](#), which addressed the sufficiency of an asylum application, and *Matter of H-A-A-V-*, 29 I&N Dec. 233 (BIA 2025), [link](#), which specifically endorsed pretermission.

For organizations that depend on city contracts to operate, the delay in payments undermines their ability to plan and budget effectively, jeopardizing the sustainability of their operations.

The New York City Council introduced legislation in March of 2024 (Int. 0514-2024) that would require the City to pay nonprofit vendors within 30 days and require interest to be paid on late payments under City contracts with nonprofit organizations. New York City has over \$12 billion in contracts with nonprofit organizations to provide essential services, including foster care, supportive housing, crime prevention, immigrant services, senior care, and community outreach. In March 2025, State Assembly Member Jennifer Rajkumar introduced the “Get Nonprofits Paid Act” (A.6573) as another avenue to address this issue. Neither of these bills have been advanced since they were introduced. While the City Bar supports these legislative fixes, non-profits do not have time to wait for the legislative process to play out. Without reliable and prompt payments, these organizations face the very real prospect of staff layoffs, reduced services, and even the potential for program closures. Such disruptions would not only harm the nonprofit organizations themselves but also leave countless New Yorkers—especially immigrant families—without the legal support they need to secure their rights and stability.

The Immigration and Nationality Law Committee has consistently advocated for full legal representation for all immigrants and increased funding for legal service providers. Today, we continue to urge the City to take immediate action to resolve these payment delays, fund follow-up legal assistance for asylum seekers initially served through the AAHC, and honor its contractual commitments. Failure to do so not only undermines the financial stability of these organizations but also risks depriving vulnerable New Yorkers of the essential legal services they need. Prompt payment and targeted reinvestment in immigration legal services are critical to ensuring that providers can continue their work in providing immigrants with the essential legal protections they deserve.

Immigration & Nationality Law Committee
Dorian Rojas, Co-Chair
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Testimony by the New York Legal Assistance Group (NYLAG)
before the NYC Council Committee on Immigration regarding:
Immigration Committee--Legal Services for Immigrant New Yorkers

October 28, 2025

Chair Alexa Avilés, Council Members, and staff, good afternoon and thank you for the opportunity to speak to the Oversight Committee about legal services for immigrant New Yorkers. My name is Jodi Ziesemer, and I am the Policy Director, Immigration Emergency Response, at New York Legal Assistance Group (NYLAG). NYLAG uses the power of the law to help New Yorkers in need combat social, racial, and economic injustice. We address emerging and urgent legal needs with comprehensive, free civil legal services, impact litigation, policy advocacy, and community education. NYLAG serves immigrants, seniors, the homebound, families facing foreclosure, renters facing eviction, low-income consumers, those in need of government assistance, children in need of special education, domestic violence survivors, persons with disabilities, patients with chronic illness or disease, low-wage workers, low-income members of the LGBTQ community, Holocaust survivors, veterans, as well as others in need of free legal services.

All of our practice areas serve immigrant New Yorkers, and we have five units with that provide immigration law services to New Yorkers across a breadth of legal matters: from humanitarian applications for survivors of sexual and gender based violence and people in need of medical support, to removal defense, to federal litigation and habeas petitions, to appellate work, citizenship, and more. In FY25, across NYLAG's immigration practice areas we provided services in 18,463 immigration cases, benefiting 48,721 individuals, including children.

We appreciate the opportunity to testify to the Immigration Committee regarding legal services for immigrants and regarding Resolution 1014. NYLAG is proud to operate in a City that values its

immigrant citizens and supports much-needed services to them through its annual budget. Our recommendations for this Committee are as follows:

- 1. Restore stability through multi-year, flexible funding for legal programming**
- 2. Support innovative and flexible programming to increase capacity to respond to harsh enforcement environment**
- 3. Work more collaboratively with legal services organizations to promote messaging and resources**
- 4. Help mitigate financial obstacles to accessing legal opportunities for status and justice**

The Immigration Landscape

There has been a dramatic sea change in local and national immigration sphere in the ten months since the second Trump Administration has assumed power. These changes encompass high profile, unprecedented enforcement action throughout the country, violent arrests, exponential increase in detentions, and rapid deportations including to third countries. Between January and July 2025, nearly 5,000 New Yorkers have been arrested by ICE, more than the entire total of people arrested in 2024.¹ This new enforcement landscape has been marked by chaos and illegal actions by ICE and the Government, making the practice of immigration law challenging and unpredictable. While as of August 2025, there are 340,000 cases currently pending before New York State immigration courts, this number does not capture the full scale of immigration enforcement against New Yorkers, who are being put into expedited removal proceedings, having their immigration cases dismissed before trial, transferred by ICE to other states, and being detained at numbers double those from a year ago.²

In addition to well-documented enforcement action, there has been less visible policies to

¹ <https://www.wxnews.org/local-news/2025-08-19/ice-arrests-in-new-york-surpass-2024-totals-after-recent-surge>

² https://www.vera.org/ending-mass-incarceration/reducing-incarceration/detention-of-immigrants/advancing-universal-representation-initiative/immigration-court-legal-representation-dashboard?token=4FrZTPZ-AANDchNGxbQcgxF_-cRsiyF2

undermine and revoke lawful status, delay processing of documentation, and increased enforcement actions for immigrants in all parts of the immigration process from visas to naturalization. The Trump Administration has attempted, through a multi-prong approach, to eviscerate our asylum system and dismantle the neutral adjudications at USCIS, Dept of State, and Immigration Courts. There are very few checks on enforcement and the recent infusion of substantial funding to DHS to establish more robust infrastructure and staffing for immigration enforcement will have lasting effects for decades.

Legal services are critical to mitigate the harshest and most inhumane consequences of enforcement in this current environment. This requires all immigration providers to develop expertise on detention and deportation, and an urgent need to increase capacity for detained representation and federal court actions to meet the community need. Clinics, brief services, and pro se extensive service help, all must carry with it a deep understanding of enforcement risks and safety planning, in order to ensure that all services reflect the changing environment that our communities are navigating. At the same time, ensuring that immigrants who are eligible and want to stabilize their status in the United States is essential. We must meet the current moment, while not turning our back on the previous and ongoing needs. New York must fund new deportation defense services, sustain current programs, and invest in capacity building to respond to this extraordinary time.

1. Need to restore stability through multi-year, flexible funding for legal programming

New York Legal Service providers are under enormous pressure to fulfill our current commitments to clients and contracts in this harsh enforcement environment. Our practice has changed rapidly over the past ten months with the ending of previously straightforward pathways to immigration status

and relief such as Temporary Protected Status, parole, and DACA, and the increasingly fraught enforcement landscape which puts at risk for detention and deportation clients applying for any type of immigration benefit. In the past two decades, New York City has devised and funded stable, multi-year programming to respond to changes in the federal immigration landscape. Most notably, the City launched the ActionNYC program to provide funding for legal services in partnership with community-based organizations to address the need arising from the creation of the DACA program and the anticipation of other forms of relief for previously-undocumented New Yorkers. This program was a huge success and increased capacity and expertise as well as collaboration amongst city organizations. Unfortunately, this program has been re-envisioned to de-centralize legal support and to fund low-impact, high volume services, in a time when robust legal representation is critical. Concerningly, the new iteration of ActionNYC—now titled Legal Support Centers—eliminated extensive services at Hospitals, Libraries, and Schools which served thousands of immigrant New Yorkers every year. The reconfiguration of this programming will make legal services more challenging to access and legal representation necessary to mitigate against detention and deportation is largely absent from this new model.

The City lacks multi-year, flexible programming which would allow legal service organizations to grow their capacity and expertise to best support immigrant communities. For the past four years, contracts from the City—including, in particular, funding for legal and case management response to the influx of asylum seekers in 2022-2024—have been doled out on yearly basis, through contracts that were often negotiated after the start of the fiscal year. This instability and the short-term nature of these contracts stunted our ability to create supervision infrastructures, hire and train and promote permanent staff, and invest in systems that allow us to maximize our reach and provide secure legal support to meet the current needs. Providers need a stable source of funding that allows us to build the infrastructure and expertise that will respond to this moment and the flexibility in contractual deliverables to provide legal support that evolves to meet the current need.

2. Need for innovative and flexible programming to increase capacity to respond to harsh enforcement environment

In addition to flexibility in existing programming, there needs to be support for innovative, novel programming to respond to the increase in enforcement. Immigration representation has rapidly shifted to detention work, bond, challenging removal orders, appeals, and federal habeas petitions. Just last year, the focus for work was temporary Protected Status, asylum, parole, and contingent work authorizations based on those applications; however, there has already been a swift reconfiguring of our immigration system to end many of these pathways to status and to put substantial barriers to extant forms of relief such as asylum. For full representation, immigration cases now require a commitment of years and expertise across immigration practice areas. There are no more straightforward cases as even family-based petitions or applications for naturalization must navigate the gauntlet of stricter interpretations of the statutes, restrictive regulations, harsher adjudications or senseless denials, and are increasingly risking being routed into removal proceedings, detention, and deportation. Currently, friend of court appearances, representation in removal proceedings, appeals, motion practice, detained representation and federal litigation are at the forefront of the need and we are scrambling to shift capacity to address this change. However, given the rapid pace of new policies and practices, this current need may be eclipsed by other, pressing needs in the near future.

NYC Immigration Legal Service Providers have demonstrated their ability to create innovative, responsive programming to respond to rapidly evolving community needs and shifts in local and national immigration policy. This was evident in formation of the ICARE programming in response to the increase in unaccompanied minors immigrating to the U.S. and to the NYC area in 2014 and creation of the “rocket docket” processing of juvenile cases; creation of the Rapid Response Legal Collaborative during the first Trump Administration when immigrants with existing removal orders were targeted for detention and deportation; the creation of the Pro Se Plus Project to provide emergency

legal and information services to the large number of immigrants arrived in New York City seeking protection and humanitarian relief.

The City should ear-mark funding for creative bids for programming, that enable service providers to provide a breadth of services across immigration matters, integrating into contracts the ability to pivot in response to emergency needs, for example: to increase capacity for detained, habeas, and federal court practice in New York City. Contracts that incorporate community responsive, and support programs ability to move between levels and types of services and service models, will enable us to be nimble. This moment calls for multiple creative approaches to respond to the onslaught of national policy changes. A competitive bidding process to fund various pilot projects designed by legal services providers would generate innovative responses by the experts in the field.

3. Working more collaboratively with legal services organizations to promote messaging and resources

In past years, the Mayor's Office of Immigrant Affairs (MOIA) has played a central role in creating, translating, and distributing helpful, community-facing resources on everything from Know Your Rights to What to Do When a Loved One Is Detained By ICE. This collaboration with legal service providers to create, translate, and broadcast resources has been less prominent in recent years. Reinvigorating this collaboration is necessary in this moment when these resources are direly needed.

The City should also re-envision their hotline services to provide access to immigrant communities. MOIA has also funded and supported city-wide hotlines for information and scheduling of appointments for immigration consultations. While those hotlines, especially for appointment scheduling, have had various hiccups and technical setbacks, they have served a critical function in providing access in many different languages for immigrants in need of assistance. Unfortunately, these hotlines

have been de-funded and their ambit has been restricted. A safe, trusted hotline that coalesces information and resources for the community, could be impactful in expanded access to legal advice and advocacy at this time.

Anti-immigrant rhetoric has been a prominent feature of the Trump Administration and we hope to find increased opportunities to partner with New York City to present a countervailing narrative to welcome our immigrant neighbors, fight this divisive, violent, and xenophobic rhetoric, and reassure them that NYC is a safe space for them.

4. Help mitigate financial obstacles to accessing legal opportunities for status and justice

In July, Congress passed H.R. 1, which statutorily increased filing fees for many affirmative and defensive applications for immigration relief. Some of these applications—such as appeals and motions to reopen have increased ten-fold to more than \$1,000 per application. Other applications, such as initial employment authorization document for asylum seekers and parolees, Special Immigrant Juvenile Visa applications, and asylum applications which have historically not had any charge, now have non-waivable fees that must be paid to access these forms of humanitarian relief and benefits. Finally, it appears that fee waivers will not be available for many of these new fees and/or fee waivers will receive more scrutiny and will be denied at higher rates, necessitating payment of these exorbitant fees in order to pursue immigration status and protection from removal.

NYLAG asks that City Council set aside a pot of money apart from grants and contracts that fund the provision of legal services to pay these application and court fees. It is not feasible for providers to choose between paying federal application and court fees and paying for staffing and infrastructure to fulfill our contractual obligations. These fees were designed to present fiscal barriers for immigrants to assert their rights and request humanitarian protection. Such funds will

enable immigrant New Yorkers to defend themselves from removal and pursue avenues for immigration relief, which will now require the payment of hundreds if not thousands of dollars in fees per client. We request a dedicated fund specifically for fees that can be provided to legal service providers to draw down to cover or assist our low-income clients with these fees.

5. Support for Resolution 1014

NYLAG fully support Resolution 1014 condemning the Trump administration's use of a federalized national guard to repress free speech, militarize American cities and carry out his anti-immigrant agenda. As we have seen in Chicago, Los Angeles, Washington D.C. and Portland, the U.S. of the national guard serves not to make the residents of our cities safer but to instill fear, assist with violent, illegal immigration arrests, and repress free speech in opposition to immigration enforcement.

I want to once again take the opportunity to thank Chair Alexa Avilés and the members of the Committee for their exceptional leadership and commitment to overseeing issues related to immigration in New York City, and for working to schedule this hearing today. I welcome the opportunity to discuss any of these matters with the Committee further.

Respectfully submitted,

Jodi Ziesemer

New York Legal Assistance Group

RUSSIAN-SPEAKING COMMUNITY COUNCIL (RCC)

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Testimony for the City Council Immigration Committee oversight hearing on legal services for immigrant New Yorkers

October 28, 2025

Thank you, Chair Avilés and the Committee, for the opportunity to submit testimony for this hearing. I am the President and CEO of the Russian-speaking Community Council, by now 14-year old, based in Northern Manhattan. RCC is currently the oldest active grassroots NGO serving immigrants, refugees, and political exiles from former Soviet countries. Our work primarily involves advocacy at all levels of government, as well as organizing and, occasionally, providing direct services. I will also be direct in this testimony, in keeping with the spirit of our times.

Russian and Ukrainian speakers constitute the third largest regional linguistic group in our city. Russian is the third most spoken foreign language, used by approximately 2.5 percent of the city's population, according to estimates from the Annual Community Survey. However, our community and their NGOs face severe and systemic discrimination in funding, including for legal services, from both government sources and powerful private gatekeepers in this sector. We have raised this issue at many levels, occasionally receiving positive responses from some of the previous federal and city administrations, but never getting a sustained solution that matches the level of support provided to other immigrant communities of comparable size and NGOs of comparable record of service.

In the past three years, since the start of the full-blown war in Ukraine, over two hundred thousand Ukrainians came to the U.S. on parole, and tens of thousands of anti-war and pro-democracy Russians sought asylum at our southern border. A quarter to a third of them ended up in the NYC area. One would think that pro-democracy New Yorkers would recognize them as natural allies in the defense of our own democracy, which is in retreat as never before. Yet our city budget schedule C for the past 3 years shows not a single award to any Russian or Ukrainian NGO in the amount that would enable them to hire an attorney, even on a part-time basis.

In the latest budget cycle, we pursued this issue with several elected officials in our service area, yet the outcome is strikingly the same, in spite of the fact that some of these officials also belong to immigrant communities for whose interests our organization has also advocated for over a decade, being the only pro-immigrant NGO in our community and incurring the wrath of some dominant interests in our own diaspora.

As a result of all this, our newcomers too often face insurmountable barriers in access to legal services. In the past few days, we conducted a survey among our former clients and other contacts, and not a single one of them reported having been able to obtain legal representation from either our city or city-funded agencies.

Meanwhile, in the past two months, dozens of bona fide asylum seekers, with a clear record of antiwar and pro-democracy activities in Russia, have been deported by the Trump Administration straight into the hands of their persecutors. Meanwhile, others with similar backgrounds have been denied their affirmative asylum applications after many years of waiting and building their lives and their children's lives in our country, confident of a positive outcome of their application in light of their record and the intensity of political persecution in Russia.

Given that our city is home to the largest Russian-speaking population in our country, I urge the Committee to initiate a resolution condemning the administration's de facto refoulement of Russian asylum seekers back to Russia, in violation of the 1951 Refugee Convention. I also call upon this esteemed Committee, and upon the next Council about to be elected, to respond to multiple requests to address the inequity and exclusion faced by my immigrant community. As a first step, I urge you to convene a hearing on the state of the Ukrainian, Russian, and other ex-Soviet immigrant diasporas in our city, with a particular focus on recent refugees and asylum seekers.

Thank you for your attention.

Dmitri Daniel Glinski, Ph.D.
President & CEO,
Russian-speaking Community Council (RCC)

Testimony of Sakhi for South Asian Survivors

Before the New York City Council Committee on Immigration

Oversight Hearing: “Legal Services for Immigrant New Yorkers”

October 28, 2025

Submitted by:

Tan Hayat

Manager of Advocacy and Impact Strategy

Sakhi for South Asian Survivors

Thank you, Chair Avilés and members of the Committee on Immigration, for the opportunity to testify on behalf of Sakhi for South Asian Survivors. My name is Tan Hayat, and I am the Manager of Advocacy and Impact Strategy at Sakhi.

We begin by expressing our deep gratitude to the City Council for the funding we received this year to expand Sakhi’s Legal Justice Program (LJP). This investment allows us to rapidly grow our capacity and meet the urgent, increasing need for immigration legal services within the South Asian and Indo-Caribbean communities we work with.

Sakhi works with survivors of gender-based and communal harm from across New York City’s South Asian and Indo-Caribbean diaspora. We engage survivors through a holistic model that includes housing and economic justice, mental health counseling, and immigration legal advocacy. The intersections of these systems—legal, social, and cultural—define the realities of safety and access for our communities.

Why Sakhi’s immigrant legal services work is essential

New York City is home to approximately 3.1 million immigrants, or about 37 percent of the city’s total population.¹ Within that number are some of the largest South Asian communities in the country. New York State has the largest Bangladeshi-origin population in the United States,² and a rapidly growing Indo-Caribbean diaspora that continues to be under-counted in demographic and service data.³ These are the very communities that Sakhi was created to work alongside—communities for whom mainstream systems are often linguistically, culturally, and bureaucratically inaccessible.

For many survivors, immigration status is directly tied to safety. People experiencing harm are often threatened with deportation, pressured into silence by dependent visa structures, or fearful of losing access to children and income. In this context, Sakhi’s Legal Justice Program plays a critical role: helping survivors navigate asylum, family petitions, deferred action, and other pathways to relief, while grounding that work in trauma-informed advocacy.

¹ U.S. Census Bureau, American Community Survey, 2023 1-Year Estimates: New York City Population by Nativity (Washington, D.C.: U.S. Census Bureau, 2024).

² Pew Research Center, Key Facts about Asian Origin Groups in the U.S. (Washington, D.C.: Pew Research Center, 2023).

³ Asian American Federation and Caribbean Equality Project, A Hidden Diaspora: The Indo-Caribbean Population in New York City (New York: AAF/CEP, 2024).

Trends and observations from our work

The federal government's recent escalation of enforcement—coupled with suspended refugee admissions, narrowed access to relief for children and families, and heightened detention—has placed survivors in untenable positions. We are increasingly working with survivors who receive conflicting or incomplete information about court dates, hearings, or next steps. Such confusion can cost them their cases, even when they have valid claims.

This past summer, Sakhi's Legal Justice Program was able to file a VAWA petition in-house for a survivor who was already working with Sakhi. For the first time, they did not have to be referred out or navigate multiple agencies. They received legal representation, counseling, and economic advocacy through one coordinated, trauma-informed process. This experience demonstrates what becomes possible when survivors can access immigration legal services within a trusted, culturally specific organization—and how much is lost when such services are fragmented or inaccessible.

From Sakhi's perspective, these are not isolated challenges. They reflect a structural disconnect between systems addressing gender-based harm and those governing immigration relief. Without integrated, survivor-centered legal support, immigrant survivors are left to navigate some of the most complex and high-stakes systems in the country on their own.

Recommendations

To meet the growing demand and ensure that immigrant survivors of gender-based harm can access justice and safety, we urge the Council to:

1. Expand and sustain funding for immigration legal services, with dedicated allocations for survivors of gender-based harm and their children.
2. Strengthen coordination between the Mayor's Office of Immigrant Affairs and culturally specific, community-based organizations that have the linguistic and cultural expertise to build trust with survivors.
3. Ensure access to fair immigration court processes, particularly in light of increased enforcement and arrests connected to court appearances.

For survivors within the South Asian and Indo-Caribbean diaspora, access to immigration legal assistance is not a secondary concern—it is fundamental to safety, dignity, and the ability to rebuild life in the aftermath of harm. Sustained investment in organizations like Sakhi ensures that the city's commitment to immigrant justice includes the communities most at risk of being left behind.

Thank you for your attention and for your continued partnership in protecting immigrant New Yorkers.

**The Bronx
Defenders**

**Redefining
public
defense**

**New York City Council
Committee on Immigration
Oversight - Legal Services for Immigrant New Yorkers
October 28, 2025, 10am**

**Written Testimony of Rosa Cohen-Cruz, Director of Immigration Policy and Karla Ostalza
Managing Director of the Immigration Practice, for The Bronx Defenders**

Chair Aviles and Committee Members, thank you for holding this hearing today to address the issue of legal services for immigrant communities, a critical need at a time where ICE is already targeting New Yorkers and preparing to escalate their presence in our communities. The Bronx Defenders (“BxD”) is a public defender non-profit that is radically transforming how low-income people in the Bronx are represented in the legal system. Our staff of over 450 includes interdisciplinary teams made up of criminal, civil, immigration, and family defense attorneys, as well as social workers, benefits specialists, legal advocates, parent advocates, investigators, and team administrators, who collaborate to provide holistic advocacy to address the causes and consequences of legal system involvement. Through this integrated team-based structure, we have developed a groundbreaking, nationally recognized model of representation called holistic defense that achieves better outcomes for the people we represent. Each year, we defend more than 20,000 low-income Bronx residents in criminal, civil, family regulation, and immigration cases, and reach thousands more through our community intake, youth mentoring, and outreach programs. Through impact litigation, policy advocacy, and community organizing, we push for systemic change at the local, state, and national levels. We take what we learn from the people we represent and communities we work with and launch innovative initiatives designed to bring about real and lasting change.

INTRODUCTION

We want to begin by recognizing and sincerely thanking the City Council for its tremendous commitment to immigrant New Yorkers through the recent increase in funding for the New York Immigrant Family Unity Project (NYIFUP). Thanks to the increase in funding from New York City Council, NYIFUP is more equipped to meet the moment, and provide critical representation to detained immigrants whose cases are venued at Varick and Elizabeth immigration court. NYIFUP is a lifeline for countless families across the city. It ensures that the people we

represent, our neighbors, family members, and community, are not forced to navigate deportation proceedings from detention alone.

NYIFUP is an extraordinary model, and a testament to New York City's leadership. But it cannot meet the full scale or complexity of today's challenges alone. Despite these critical investments, the need continues to grow and evolve. At the Bronx Defenders, we regularly receive calls from people seeking representation for ICE check-ins, naturalization and other applications for status, non-detained cases, and post-conviction relief, or federal representation. We are proud to offer our community intake project to serve walk-in Bronx residents, and this program has expanded to serve more people seeking help in the Bronx, a historically under-resourced borough.

However the cases coming in through this work are increasingly complicated, often involving individuals at imminent risk of detention. These cases require time, specialized expertise, and sustained representation to keep families together and protect people's rights. We have built out our community intake capacity with the funding we currently have but we are stretched to the limit. We regularly have to turn people away who are trying to access our services, and our staff face difficult choices about whom we can represent. Too often, we are forced to prioritize only those at the highest risk of detention or deportation, leaving many others unserved despite their urgent need for help.

More resources for community intake would enable us to take significantly more proactive steps to help people avoid detention. We would be able to accompany community members to OSUP and ISAP check-ins, and build out a habeas practice—or at least provide pro se assistance—for individuals who are detained during these appointments (including those with pending final orders). We could also take on detained motions to reopen for these same individuals and enter appearances for more pro se respondents, allowing their in-person master calendar hearings to be converted to virtual hearings so they can litigate their cases while remaining in the community. In addition to our detention defense work, our community intake project also handles a substantial number of complex naturalization cases. Since the Trump administration, we have deprioritized this area to focus more on urgent deportation and detention cases. However, naturalization fits squarely within an early defense strategy—it's the ultimate form of deportation prevention. With more funding, we could build capacity to strengthen both efforts simultaneously.

Across the city there is a growing need for attorneys who can provide rapid response and full-scope representation, not just screenings or advice. This includes appearing at ICE check-ins, filing emergency habeas petitions when someone is detained, and taking on BIA or federal appeals when cases have been mishandled or pursued pro se. Many of these cases are deeply complex and cannot be adequately handled through brief consultations or limited-scope services. What our communities need is full representation, especially for complex matters which increasingly includes more categories of cases. Even in naturalization cases, we see new hurdles that did not exist before this year, for example, USCIS officers telling people that they will no

longer offer interpretation while also selectively allowing hired interpreters to accompany people into the interviews. The reality is that pro se representation is increasingly unpredictable, and the law itself is becoming more punitive. There is simply no substitute for direct, expert legal representation.

The complexity of these matters is increasing as immigration law becomes harsher, immigration judges are replaced with less experienced decisionmakers¹, and access to bond is more restricted than ever². The federal government's sweeping expansion of immigration detention and its increasingly aggressive enforcement strategies mean, for our clients and our attorneys, the fight to protect detained immigrants has moved beyond the immigration courts and into the federal district courts, where the legal standards, procedural rules, adversaries, and professional norms differ dramatically. Habeas corpus petitions in federal district court have become the central tool for challenging unlawful detention and securing meaningful judicial review for immigrants in custody³. In these venues, expertise and swift action can mean the difference between deportation and safety, and we need new training and investments to ensure that our attorneys, who are mostly experienced in immigration court, are equipped to meet the moment.

We urge the City Council to consider:

- **Expanding funding for full-scope representation**, particularly for complex detained and non-detained removal cases;
- **Investing in staffing, training, experts, and travel resources** to meet the growing need for intensive, time-sensitive advocacy; and
- **Strengthen support of community based walk-in immigration services**, particularly in under-resourced areas in New York City.

Of course, lawyers alone cannot solve this crisis. Real change requires smart, structural policy reforms that stop New York City and State from colluding with ICE, whether by funneling people into detention, aiding enforcement, or profiting from the system. The Bronx Defenders has invested in our holistic policy team because our proximity to the communities most affected gives us a clear view of how current policies harm New Yorkers every day. Accordingly, we urge the City Council to invest in the strategic reform and impact litigation work of legal service providers like The Bronx Defenders. Supporting this work ensures that those closest to the

¹ U.S. Department of Justice, Executive Office for Immigration Review. *EOIR Announces 11 Immigration Judges and 25 Temporary Immigration Judges*. Oct. 24, 2025. <https://www.justice.gov/eoir/media/1415981/dl?inline>

² Cassler, Rebecca. "BIA Decision Strips Immigration Judges of Bond Authority, All but Guaranteeing Mandatory Detention for Undocumented Immigrants." *American Immigration Council Blog*, 12 Sept. 2025. <https://www.americanimmigrationcouncil.org/blog/bia-ruling-immigration-judges-bond-mandatory-detention-undocumented-immigrants/>

³ Cardozo School of Law. (2025). *National Immigration Habeas Institute*. <https://cardozo.yu.edu/national-immigration-habeas-institute>

ground, those who see the real-world consequences of these policies, can continue driving systemic change at the city, state, and federal levels.

To that end, the Bronx Defenders supports [Resolution 1014](#) condemning the Trump administration's use of a federalized national guard to repress free speech, militarize American cities and carry out his anti-immigrant agenda. To that end, the Bronx Defenders supports Resolution 1014 condemning the Trump administration's use of a federalized national guard to repress free speech, militarize American cities and carry out his anti-immigrant agenda.

By deepening the City's investment in holistic, full scope, community-based immigration defense both detained and non-detained, New York can continue to lead the nation in protecting immigrant families and ensuring that due process is more than a promise on paper.



To: New York City Council Committee on Immigration
From: Celina Muñoz, Paralegal & DOJ-Accredited Representative; Ellinor Rutkey, Staff Attorney, The Door's Legal Services Center
Re: Oversight Hearing: Legal Services for Immigrant New Yorkers

Date: October 28, 2025

The Door is a comprehensive youth development organization that has been supporting vulnerable youth in New York City since 1972. Each year, we provide services to nearly 9,000 young people between the ages of 12 and 24, many of them immigrants. The services we provide include healthcare, education, supportive housing, food and nutrition, career development, arts and recreation, mental health counseling, and legal assistance — all under one roof. We are also a Department of Youth and Community Development (DYCD) Runaway and Homeless Youth drop-in center, providing food, clothing, showers, laundry, and case management services to young people who are unhoused or unstably housed. At The Door, we emphasize empowering and engaging the young people we serve, and we are committed to creating a safe, equitable, and inclusive space for young people and staff.

The Legal Services Center at The Door is an office of over 50 individuals, including attorneys, social workers, paralegals, and support staff. We specialize in serving vulnerable children and young people, including many clients who are unhoused, undocumented, and/or LGBTQIA+. Our attorneys represent youth in removal proceedings before immigration courts, as well as those seeking to regularize their status through the filing of affirmative humanitarian applications. In the fiscal year 2025, we handled 2,538 immigration matters for young people. We also operate several free legal clinics, including a weekly drop-in legal clinic for runaway/homeless youth, which primarily serves recent immigrants.

I. New York City Has a Responsibility to Immigrants

Immigrants coming to New York City are facing an unprecedented assault on their right to migrate and seek safety at the local, state, and national level. As violence against immigrants soars to unbelievable new highs, it is important to remember that the right to migrate is enshrined in international human rights law, whether or not individuals are fleeing persecution.¹

New York City has some of the most robust protections for immigrants in the country, allowing those with or without status to continue to access important social services and participate in society. It is imperative that, in the wake of a punitively anti-immigrant federal government, the City continue to protect and advance the rights of immigrants.

¹ “Everyone is entitled to all the rights and freedoms set forth in this Declaration, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status.” Universal Declaration of Human Rights, G.A. Res. 217A (III), U.N. Doc. A/810 at 71, Art. I-II (1948).

a. Immigration is a Critical Aspect of New York City Life

Immigration has always been an integral part of the character of New York City. Immigrants in New York City have formed vibrant and diverse communities, without which New York City would not be the social, cultural, and economic hub that it is globally recognized as today. New York City fundamentally depends on and benefits from the presence and contributions of immigrants. As such, enshrining protections for immigrants must be a priority of the New York City government in order to preserve and promote the values on which this city has been built. New York City has long been a safe place for immigrants, and protections for immigrants are deeply imbedded in the legal and cultural history of the City. In 1989, then-Mayor Ed Koch signed an executive order barring city officials from sharing information about a person's immigration status with federal immigration authorities.² This order and subsequent policies amount to New York City's "sanctuary city" designation, meaning that New York City officials—particularly from the New York City Police Department (NYPD) or the Department of Corrections (DOC)—are not required to facilitate contact between immigrants and federal agencies.³ An additional key element of the City's sanctuary city policy is the treatment of Immigration and Customs Enforcement (ICE) detainees. ICE detainees are requests made by ICE to city agencies to hold or detain noncitizens so that ICE may more easily take them into custody and remove them from the United States.⁴ As agencies within a sanctuary city, the NYPD and DOC are not permitted to comply with ICE detainer requests unless ICE can produce a judicial warrant or proof that the noncitizen has been convicted of a serious crime.⁵

New York's status as a sanctuary city makes *everyone* safer. For one, New York's sanctuary city policy allows immigrants to more confidently engage with New York City officials without fear that doing so will bring them to the attention of the federal government. This in turn makes it substantially easier for immigrants to take actions that benefit themselves and the broader New York City community, such as seeking healthcare or reporting a crime. Additionally, crime is markedly lower and labor force participation is significantly higher in sanctuary counties compared to counties without sanctuary policies.⁶

II. Immigrants Face Violence, Terror, and Uncertainty Under the Trump Administration

a. Young Recent Immigrants are Extremely Vulnerable

Recent immigrants to New York City—especially children and young adults—are in extremely vulnerable positions. Many of them have only recently arrived in the United States after a long, perilous, and often traumatic journey from their countries of origin. Even before setting out on

² Office of Mayor Ed Koch, Exec. Order No. 124 (Aug. 7, 1989), https://www.nyc.gov/html/records/pdf/executive_orders/1989EO124.PDF.

³ Gwynne Hogan & Rachel Holliday Smith, *What Exactly Is a Sanctuary City and What Does That Mean for NYC?*, The City (Feb. 13, 2024), <https://www.thecity.nyc/2024/02/13/sanctuary-city-explainer-nyc/>.

⁴ U.S. Immigr. and Customs Enforcement, *Immigration Detainers* (Dec. 3, 2024), <https://www.ice.gov/immigration-detainers>.

⁵ *See id.*

⁶ *The Effects of Sanctuary Policies on Crime and the Economy*, Ctr. for Am. Progress (Jan. 26, 2017), <https://www.americanprogress.org/article/the-effects-of-sanctuary-policies-on-crime-and-the-economy/>.

that journey, many of these young people have already experienced significant trauma in their lives.

For example, one Door client, “Maria,” became pregnant in her home country at age thirteen after being forced into sex work by her father. After discovering what had happened, Maria’s mother arranged for her travel to the United States, where she now lives with her mother and young son in a family shelter. Here in New York, Maria is able to apply for immigration relief, access counseling services, and attend school with the support of her mother, who also takes care of Maria’s son. Unfortunately, Maria’s mother does not have any immigration status, putting her at risk of deportation. If her mother were to be deported, Maria would be left alone at the age of fifteen to navigate the city and care for her toddler son. In such cases, forced family separation by deportation can have detrimental effects on the emotional, physical, and psychological well-being of already vulnerable young people.

Other young people at the Door have experienced significant trauma due to familial abuse, neglect, or abandonment. One Door client came to the United States after traveling by plane, bus, and by foot from his home country in North Africa. The young person had made the difficult decision to leave his home country after rebel forces broke into his family’s home, raped his sister, and beat his brother to death before his eyes. Here in the United States, he has found happiness and safety.

On top of the often-traumatic situations they have weathered in their home countries and on the journey to the United States, immigrant young people now face even greater risk under the second Trump Administration.

i. Rise in Requests for Evidence in Special Immigrant Juvenile Status (SIJS) Cases

In recognition of the vulnerabilities of young immigrants, Congress created Special Immigrant Juvenile Status (“SIJS”) in 1990. SIJS provides a path to legal status for vulnerable youth who have been abandoned, abused, or neglected by a parent, and for whom it is not in their best interest to return to their home country. The application process for SIJS has two steps: first, a state juvenile court must make factual findings regarding the young person’s eligibility for SIJS; then, the youth must petition U.S. Citizenship and Immigration Services (“USCIS”) for SIJS. USCIS must approve the youth’s application if the application demonstrates eligibility by a preponderance of the evidence.

During the application review process, USCIS may issue a Request for Evidence (“RFE”) to seek additional information in cases where there are questions about eligibility or evidence. If an RFE goes unanswered or is not adequately answered, the SIJS application will be denied. Though RFEs used to be relatively rare, Door staff have noticed a substantial increase in the number of RFEs received under the current presidential administration.

RFEs typically require the recipient to submit additional or clarifying information to demonstrate their eligibility. It is difficult for young people to adequately respond to RFEs without legal support. For example, an RFE response may necessitate returning to a juvenile court to receive

amended orders, explaining in greater detail the judge's basis for making certain factual findings. Thus, if young people lack proper legal representation and guidance to respond to these requests, they will not have a meaningful opportunity to respond to USCIS's questions or provide additional information, and as a result, a significant number of SIJS cases will be denied.

Young people who completed the SIJS process without the assistance of a lawyer are at particular risk of receiving a SIJS denial based on an RFE. Many youth who received *pro se* plus help through the Red Cross Asylum Application Help Center (AAHC) were left with no legal support following the AAHC's closure in June, and as a result, were left to deal with RFEs on their own. These young people often miss key deadlines or are unable to submit the required evidence without support, resulting in a denial of their SIJS application.

Youth who have lived or currently live in shelters are also at particular risk of having their SIJS application denied following an RFE. Young people who have lived in the shelter system have often moved from shelter to shelter several times, and as a result, tend to have unstable mailing addresses. But because RFEs are sent by mail, these youth are at great risk of never receiving an RFE and thus missing the deadline to respond and subsequently receiving a SIJS denial.

Young people will suffer irreparable harm due to SIJS denials. For one, many youth are not eligible for other forms of immigration relief, and a SIJS denial will leave them with no remaining options for legal status. Moreover, young people can be placed in removal proceedings if their SIJS applications are denied, putting them at risk of removal from the United States, despite the fact that a juvenile court judge has already decided that it would not be in their best interest to return to their country of origin.

ii. End of Deferred Action for Special Immigrant Juveniles

SIJS applicants face additional challenges under the Trump Administration in the form of the end of SIJS deferred action ("DA") – the government's agreement to no longer try to remove the recipient from the United States for a period of time. In the past and as a matter of official USCIS policy, applicants for SIJS were automatically considered for DA. In practice, USCIS gave DA to practically all SIJS recipients. This was in recognition of the vulnerability of SIJS youth and the fact that SIJS recipients must often wait years between when they submit their application for SIJS and when they may apply for a green card based on approved SIJS (a phenomenon dubbed the "SIJS backlog").⁷

DA provides key protections for youth stuck in a limbo state between SIJS approval and green card approval. It provides protection against deportation and confers eligibility for work authorization. For youth forced to wait years to be eligible to apply for a green card, these protections are key to establishing safety and stability in the United States.

But in April 2025, without notice or warning, the Trump Administration stopped considering SIJS applicants for DA. Though no official policy was announced at that point, practitioners became aware of the change when they realized that approval notices for SIJS petitions began to

⁷ See *About the SIJS Backlog*, End the SIJS Backlog (last visited Oct. 27, 2025), <https://www.sijsbacklog.com/aboutsijs>.

omit any DA determination. About two months later, USCIS formally rescinded the SIJS DA policy, deciding to no longer consider granting DA to SIJS youth waiting to apply for a green card.⁸

The end of the SIJS DA policy puts the hundreds of thousands of youth in the SIJS backlog⁹ at great risk. For one, young people in immigration proceedings without protections like DA are at greater risk of deportation. Further, with the end of DA, young people will not be eligible to apply for an Employment Authorization Document (“EAD”), meaning they will not be legally allowed to work in the United States, and are thus faced with an impossible choice: remain unemployed for years on end, unable to support themselves, or accept the risks of working without work authorization. Young people who decide to work without a work permit are put at risk of experiencing labor rights violations such as wage theft, unsafe working conditions, discrimination, and harassment. In these ways, the end of the SIJS DA policy undermines the original intent behind the creation of SIJS – to provide protection and safety to vulnerable youth.

iii. Targeting of Unaccompanied Minors

At The Door, we work with many young people who entered the United States as unaccompanied children (“UCs”), children who are under the age of 18 and enter the country without their parent(s). UCs are placed in the custody of the Office of Refugee Resettlement (“ORR”) in facilities located across the country. The Door is the assigned legal service provider for multiple ORR facilities in New York State. We represent both UCs who are detained and UCs who have been released from detention and live in New York City.

Understandably, UCs are a particularly vulnerable population and face a number of challenges while detained. For example, UCs report poor language access within ORR custody and feelings of isolation and fear. The challenges faced by UCs have grown significantly over the course of the last several months, as the Trump Administration has begun targeting these vulnerable youth in unprecedented ways.

A mere month after Trump’s inauguration, ICE began targeted UCs who had been released from custody for “wellness checks,” during which ICE agents appear at the home of the UC and their sponsor to interrogate them about their lives and inspect the home. Both UCs and non-citizen sponsors are vulnerable to arrest and detention following these visits. Since February 2025, nearly 500 UCs have been re-detained by ORR following a “wellness check,” sometimes as a result of the arrest and/or detention of their sponsor by ICE.¹⁰

Beginning in March 2025, ORR instituted more onerous requirements for prospective sponsors of detained UCs. To be released from ORR custody, UCs generally must identify an adult in the

⁸ U.S. Citizenship and Immigr. Servs., *Policy Alert: Special Immigrant Juvenile Classification and Deferred Action*, PA-2025-07, (June 6, 2025), <https://www.uscis.gov/sites/default/files/document/policy-manual-updates/20250606-SIJDeferredAction.pdf>.

⁹ See *About the SIJS Backlog*, End the SIJS Backlog (last visited Oct. 27, 2025), <https://www.sijsbacklog.com/aboutsijs>.

¹⁰ Kids in Need of Defense, *A Timeline: How the Second Trump Administration Is Rolling Back Protections for Unaccompanied Children*, 1, 6 (Oct. 2025), https://supportkind.org/wp-content/uploads/2025/10/25_Trump-Admin-Rollbacks-Timeline.pdf.

United States who can serve as their sponsor, and that sponsor must be vetted and approved by ORR. The new ORR requirements regarding sponsors mandate that sponsors claiming a biological relation to a UC undergo DNA testing to prove that relation, and that the sponsor prove their identity and income with documents typically most available to people with immigration status. These policy shifts made it significantly more difficult for people without legal status to sponsor UCs, causing the average length of detention for UCs to skyrocket from 35 days to 171 days.¹¹

Over Labor Day weekend, the Trump Administration attempted to deport about 400 unaccompanied Guatemalan children living in ORR custody. The operation was carried out with minimal notice and in the overnight hours of a holiday weekend. Despite the Administration's attempt to quickly deport these youth before legal services providers could intervene, the National Immigration Law Center ("NILC") quickly filed for an emergency restraining order. Judge Sooknunan in Washington, D.C., issued a temporary restraining order halting the deportations and ordering the return of children already en route to Guatemala. Some children in Texas were already shackled aboard planes on the tarmac in Harlingen at the time the order was issued. Thanks to the rapid action of legal services providers, those children were deboarded and now remain in ORR custody while the legal battle for their protection plays out.

Though these youth are temporarily safe, we are gravely concerned that the Trump Administration may again try to illegally and rapidly deport vulnerable youth in ORR detention. For example, Honduras has seemingly signed an agreement with the United States to accept repatriated minors – a type of agreement also seemingly made by Guatemala prior to the attempted deportation of the Guatemalan children.¹² As the Trump Administration continues to negotiate agreements with countries across the world to accept immigrants (including those who have no ties at all to that country), youth who are already in the custody of immigration authorities only face greater risk of being quickly removed from the United States to a country where their wellbeing would be threatened, and where they may not have any adult to care for them.

Just weeks after the Administration's attempt to unlawfully remove Guatemalan youth from the United States, the Administration again launched an operation targeting detained youth at the beginning of October. The operation, callously dubbed "Freaky Friday," targeted youth as young as 14 years old. Impacted children were sent letters from ICE threatening indefinite detention and immediate transfer to ICE custody upon age-out (i.e., upon the minor's 18th birthday) if they did not waive their rights under the Trafficking Victims Protection Reauthorization Act ("TVPRA")¹³ and withdraw any applications for immigration relief. The letter further offered

¹¹ *Id.*

¹² See Sofia Menchu, *Guatemala Prepared to Receive Deported Minors from the U.S., President Says*, Reuters (Sept. 1, 2025), <https://www.reuters.com/world/americas/guatemala-prepared-receive-deported-minors-us-president-says-2025-09-01/>.

¹³ The TVPRA confers certain rights upon unaccompanied minors, including the right to have their asylum case heard by USCIS rather than EOIR. This right is significant because USCIS is generally thought to be a more favorable adjudicator than EOIR. While the asylum process in immigration court is adversarial, the process before the USCIS asylum office is not. In immigration court, a Department of Homeland Security (DHS) lawyer will be present to contest the applicant's claim for relief, and a DHS administrative judge will decide the case following a trial, whereas before the asylum office, an asylum officer will interview the applicant to determine if they should be

these children \$2,500 to return to their countries of origin. Though the letter framed this threat as an “offer,” it also insinuated that the children’s parents, if located in the United States, would be arrested if the child did not comply with this “offer.”

Though The Door and other legal services providers have worked quickly and tirelessly to ensure that UCs know their rights, there is an immediate and substantial risk that the Trump Administration will continue to target this vulnerable population, and as a result, immigrant children will be coerced into waiving their rights, or worse, be removed from the United States. These attacks on immigrant youth are unprecedented and require rapid and sustained intervention in order to prevent irreparable harm.

b. Immigrants are Being Brutalized and Kidnapped by ICE Within Our City, Including at New York Immigration Courts

The U.S. immigration system relies on a system of more than 70 immigration courts to process immigration applications, hear asylum cases, and otherwise make decisions regarding the immigration status of approximately 3.5 million noncitizens across the country.¹⁴ About 325,000 of those cases are heard in New York City.¹⁵

For noncitizens with cases in immigration court or required check-ins with ICE, attendance is mandatory. A noncitizen who misses a hearing faces an extremely high risk of being ordered removed *in absentia* by the immigration judge (“IJ”) – without an opportunity to defend themselves or present their claim for relief to a judge. Likewise, a noncitizen who misses an ICE check-in faces a high risk of being detained upon any future contact with ICE. Moreover, noncitizens who have cases in immigration court must pursue many key forms of immigration relief, like asylum, before the court. If their immigration court case is dismissed, any claims for relief pending before the court will likewise be dismissed.

In recognition of the vital role that immigration courts play in the modern U.S. immigration system, ICE has historically been mostly prohibited from conducting enforcement actions (in other words, making arrests) at immigration courts.¹⁶ But in May 2025, ICE not only began enforcement actions at immigration court – they began indiscriminately and violently arresting and detaining hundreds of noncitizens each week at required, routine immigration court

granted asylum without any adversary present. Whether a case is heard by USCIS or EOIR can be the deciding factor as to whether that case is granted or denied.

¹⁴ See Exec. Off. of Immigr. Review, *Immigration Court Practice Manual*, Ch. 1.5 (last visited Oct. 23, 2025), <https://www.justice.gov/eoir/reference-materials/ic/chapter-1/5>; TRAC Immigration, *Immigration Court Backlog: All-2025* (last visited Oct. 23, 2025), <https://tracereports.org/phptools/immigration/backlog/> (click “All-2025”).

¹⁵ TRAC Immigration, *Immigration Court Backlog: New York* (last visited Oct. 23, 2025), <https://tracereports.org/phptools/immigration/backlog/> (click “New York”).

¹⁶ See Memorandum from Tae Johnson, Acting ICE Dir., & Troy Miller, Acting CBP Comm’r, *Civil Immigration Enforcement Actions in or near Courthouses*, (Apr. 27, 2021), <https://www.cbp.gov/sites/default/files/assets/documents/2021-Apr/Enforcement-Actions-in-Courthouses-04-26-21.pdf>. Although enforcement actions at ICE check-ins were not largely prohibited in the same way, they were nonetheless uncommon and generally limited to those with criminal history.

appearances and ICE check-ins.¹⁷ On June 4th alone, ICE officers arrested 118 people in New York.¹⁸

Now, ICE officers and arrests are commonplace in New York immigration courts. Masked and armed officers line court hallways, some in plainclothes, others wearing tactical gear. They pounce on noncitizens exiting courtrooms to interrogate them on their identities. When they decide to arrest someone – practically always without a judicial warrant or any clear reason for the arrest – they do so violently, shoving immigrants against walls or to the floor, regardless of whether or not they resist their unlawful arrest.¹⁹

Although immigration courts are expressly authorized by federal regulations to hold proceedings via video conference,²⁰ which would both keep immigrants safe from courthouse arrest and reduce disorganization and chaos at court, many immigration judges deny motions for a video appearance as a matter of course. Requiring immigrants to instead attend court in person gravely undermines the due process rights of immigrants and the integrity of immigration courts, and threatens the safety and wellbeing of the 3.5 million people who must attend court appearances each year.²¹

i. Impact of Courthouse Arrests on Immigrant Youth

¹⁷ See Hayley Miller, ICE Arrests at NYC Immigration Court Offer Harrowing Snapshots of Trump's Crackdown, MSNBC (July 30, 2025), <https://www.msnbc.com/top-stories/latest/26-federal-plaza-ice-arrests-immigrants-trump-jacob-soboroff-rcna221970>; Haidee Chu & Gwynne Hogan, ICE Immigration Arrests Just Shot Through the Roof, New Data Shows, The City, (July 16, 2025), <https://www.thecity.nyc/2025/07/14/ice-migrant-arrests-trump-administration-deportations-data/>; Barbara Russo-Lennon & Lloyd Mitchell, ICE in Courts: More Immigrants Cuffed at Federal Plaza as Even Officers Feel the Strain, amNY (July 17, 2025), <https://www.amny.com/police-fire/ice-immigrants-arrested-federal-plaza-07172025/>; Dean Moses, Gone in 30 Seconds: Frantic Scenes in Lower Manhattan as ICE Agents Apprehend Immigrants Attending Court Hearings, amNY (June 10, 2025), <https://www.amny.com/new-york/ice-agents-lower-manhattan-court-immigrants-06102025/>; Noorulain Khawaja, Immigrants' Courthouse Arrests in NYC Prompt Fear and Calls for Investigation, NY1 (June 6, 2025), <https://ny1.com/nyc/all-boroughs/news/2025/06/06/immigrants--courthouse-arrests-in-nyc-spur-fear--calls-for-investigation>; Ximena Bustillo, ICE's Novel Strategy Allows for More Arrests from Inside Immigration Courts, Nat'l Public Radio (June 12, 2025), <https://www.npr.org/2025/06/12/nx-s1-5409403/trump-immigration-courts-arrests>; Andrew Rice & Paula Aceves, *Portfolio: The Trap at 26 Federal Plaza*, N.Y. Magazine (Oct. 20, 2025), <https://nymag.com/intelligencer/article/26-federal-plaza-nyc-immigration-court-ice-agents-detainments-deportations.html>;

¹⁸ Hayley Miller, ICE Arrests at NYC Immigration Court Offer Harrowing Snapshots of Trump's Crackdown, MSNBC (July 30, 2025), <https://www.msnbc.com/top-stories/latest/26-federal-plaza-ice-arrests-immigrants-trump-jacob-soboroff-rcna221970>.

¹⁹ There are many reports of aggressive interactions between agents and immigrants, including reports of agents “body tackling people to the floor” and “slam[ming] people against walls [and] doors.” Noorulain Khawaja, *Immigrants' Courthouse Arrests in NYC Prompt Fear and Calls for Investigation*, NY1 (June 6, 2025), <https://ny1.com/nyc/all-boroughs/news/2025/06/06/immigrants--courthouse-arrests-in-nyc-spur-fear--calls-for-investigation>.

²⁰ See 8 C.F.R. § 1003.25(c) (“An Immigration Judge may conduct hearings through video conference to the same extent as he or she may conduct hearings in person”); Memorandum from James R. McHenry III, EOIR Dir., PM 21-03, Immigration Court Hearings Conducted by Telephone and Video Conferencing, at 3 (Nov. 6, 2020).

²¹ See Exec. Off. of Immigr. Review, *Immigration Court Practice Manual*, Ch. 1.5 (last visited Oct. 23, 2025), <https://www.justice.gov/eoir/reference-materials/ic/chapter-1/5>; TRAC Immigration, *Immigration Court Backlog: All-2025* (last visited Oct. 23, 2025), <https://tracreports.org/phptools/immigration/backlog/> (click “All-2025”).

Immigrants are terrified to attend immigration court or ICE check-ins in person. Door staff have spoken to hundreds of young immigrants who report being unable to sleep, eat, or focus on their lives because they are so afraid of being arrested while attending a routine and mandatory immigration court appearance or ICE check-in. They are acutely aware of the risks that they face merely by following the law. Door members have shared stories of friends leaving for court and not returning, and of classmates missing from school. These young immigrants want nothing more than to participate fully in their hearings and pursue the relief to which they are entitled. With such substantial ICE presence in immigration courts, however, immigrants forced to attend court in person cannot participate in hearings or pursue relief without risking violent arrest and detention.

Multiple Door members have been violently arrested at immigration court and at ICE check-ins. One such person is “Mohammad,” who entered the United States alone when he was 18 years old to seek asylum. He filed a timely *pro se* asylum application with the court as well as a *pro se* SIJS application with USCIS. He is eligible for SIJS based on the death of his father and neglect and abandonment by his mother. He appeared at his Master Calendar Hearing on June 20, 2025 via Webex with the private immigration attorney he hired to represent him in removal proceedings. However, the Immigration Judge presiding over his case ordered him to appear in person.

Later that day, Mohammad appeared for his case at 290 Broadway. The government moved to dismiss Mohammad’s asylum claim and immigration court case, and the Immigration Judge dismissed the case over Mohammad’s objection. Mohammad was immediately arrested by ICE at 290 Broadway. He was transferred to 26 Federal Plaza, then Nassau County Correctional Facility, and finally to the Metropolitan Detention Center (MDC) in Brooklyn, New York, where he remains.

When Mohammad was detained, he was terrified and confused, as no one explained what had happened in a language he understood. At MDC, the staff speak to him in English, a language he is learning but cannot converse in, so he is not able to respond or ask questions. Prior to being arrested, Mohammad was working hard to learn English so he could go on to earn his high school equivalency diploma. He was enrolled in two different language classes, one at The Door and one through the New York Public Library. When he was detained in June 2025, he lost access to his English classes, community, and all programming at The Door. He has dreams of working in the medical field. Mohammad fears removal to a country where he faces threats due to his ethnicity and political opinion. If he is removed from the United States prior to the adjudication of his SIJS application, he will forever lose the ability to obtain SIJS.

Another Door member, Mouctar, was also arrested at immigration court following a routine MCH in August 2025. Following his arrest and detention, he was quickly moved away from his New York community to a detention center in central Pennsylvania. His request to be released on bond was denied. Though he has now applied for SIJS based on the death of his father and abandonment and neglect by his mother, he remains detained without any current prospect of release. He also has a pending application for asylum based on his ethnicity and political opinion. Prior to being arrested, Mouctar was enrolled in high school in Brooklyn, where he excelled in his courses and was a valued member of his school community. His teachers and

classmates have made every effort to support Mouctar while he is detained, but more than anything, they desperately want him to return home to New York.

Just last week, a 16-year-old Door member, Joel Camas, was arrested at a routine ICE check-in. Mere weeks earlier, his mother had made the extremely difficult decision to self-deport to try to protect Joel. Even despite his mother's sacrifice, and despite the fact that Joel has approved SIJS, ICE chose to rip Joel away from his community by arresting and detaining him. Prior to being arrested, Joel was enrolled in high school in the Bronx. He was described by teachers as "a committed and responsible student." He was at imminent risk of removal to a country where he would be at risk of suffering severe financial hardship and gang violence until a Federal Court Judge issued a temporary restraining order on October 27, 2025 preventing his removal pending the adjudication of his habeas petition.

Because of the sheer volume of ICE arrests and how difficult it is for detainees to communicate with the outside world, it is likely that even more Door members have been arrested and detained by ICE in recent months.

ii. Expansion of Immigration Detention and Its Impact on Detainees

As the experiences of Mohammad, Mouctar, and Joel demonstrate, ICE arrests and detentions are devastating for both the impacted individual and for their communities. Immigrants in immigration detention have limited access to their support sources, including to legal assistance. It is much more difficult to gather evidence, prepare for a hearing, and otherwise pursue immigration relief from detention. And of course, the experience of being detained in and of itself is devastating, particularly given the inhumane conditions reported by those in immigration detention. For example, detainees in Newark have reported not being given necessary medication and not receiving any meals between 6AM and 10PM.²² Other detainees have reported similarly inhumane conditions, including being held at the 26 Federal Plaza immigration court for prolonged periods of time, where dozens of detainees were kept in bathrooms and other non-residential spaces, deprived of food, beds, and medicine.²³

In addition to arresting and detaining more immigrants, the Trump Administration has also broadened the scope of mandatory detention policies and stripped crucial and longstanding legal protections from detainees. Just days after taking office, Trump signed the Laken Riley Act ("Laken Riley") into law. Under Laken Riley, immigrants who are deemed inadmissible under certain sections of the Immigration and Nationality Act ("INA") and who are merely charged with or arrested for a number of offenses, including nonviolent offenses,²⁴ are subject to

²² Ricardo Kaulessar, *Before Recent Delaney Hall Uprising, Detainees Frequently Complained About Conditions*, North Jersey (June 18, 2025), <https://www.northjersey.com/story/news/2025/06/18/delaney-hall-history-conditions-newark-nj-ice-facility/84149059007/>.

²³ See Gwynne Hogan & Haidee Chu, 'Like Dogs in Here' - Videos Expose ICE Lockup Inside 26 Federal Plaza, The City (July 22, 2025), <https://www.thecity.nyc/2025/07/22/video-26-federal-plaza-immigration-ice-dhs-cells/>; see also Paul Moses & Tim Healy, *Inside the Manhattan Court Where ICE Fights to Keep Immigrants Locked Up*, The City (July 28, 2025), <https://www.thecity.nyc/2025/07/28/ice-detention-court-varick-street/>.

²⁴ The Laken Riley offenses are burglary, theft, larceny, shoplifting, or assault on a law enforcement officer, or any crime resulting in death or serious bodily injury.

mandatory detention and are no longer eligible for a bond hearing.²⁵ In May 2025, the Board of Immigration Appeals (BIA) decided *Matter of Q. Li*, which further expanded mandatory detention. Under *Q. Li*, noncitizens who entered the United States without inspection before being apprehended by immigration authorities and placed into removal proceedings under INA § 240 are subject to mandatory detention – even if the noncitizen had been previously released from detention and is re-detained by ICE years later.²⁶ Finally, in September 2025, the BIA decided *Matter of Yajure Hurtado*, which again broadened the scope of mandatory detention. Under *Yajure Hurtado*, any noncitizen who entered without inspection may be ineligible for bond and thus subject to mandatory detention.²⁷ Noncitizens who were paroled into the country at a port of entry may also be ineligible for bond under *Yajure Hurtado*.²⁸ However, many district courts have disagreed with the result of *Yajure Hurtado*,²⁹ and further challenges to its validity are anticipated.

As the result of these legal changes, millions of immigrants are now at risk of indefinite immigration detention, where they will face greater difficulties accessing crucial support systems and fighting their legal case, and will likely experience inhumane conditions of confinement.

Immigrants who are detained require competent, fast-acting legal support to avoid prolonged detention and/or removal from the United States. Specifically, detained immigrants need support from competent federal litigators who can file *habeas* petitions to see a detainee’s release from immigration detention. Legal services organizations thus require funding to build capacity for federal litigation by hiring experienced federal litigators and training existing staff on *habeas* litigation. Without such support, it is all but impossible for detainees to secure their own release from detention and reunification with their communities.

c. Immigrants are Being Systematically Deprived of Their Right to Due Process and to Seek Humanitarian Relief

i. Expansion of Expedited Removal

Mere days after Trump’s inauguration, the Department of Homeland Security (DHS) greatly expanded expedited removal, a procedure that allows the government to order a noncitizen removed without giving the noncitizen the opportunity to present their claim for relief before an

²⁵ Laken Riley Act, Pub. L. 119-1, 139 Stat. 3; see Nat’l Immigr. Project, *Practice Advisory: The Laken Riley Act’s Mandatory Detention Provisions* (Feb. 5, 2025), <https://nipnlg.org/sites/default/files/2025-02/Alert-Laken-Riley-Act.pdf>.

²⁶ See *Matter of Q. Li*, 29 I&N Dec. 66 (BIA 2025).

²⁷ See *Matter of Yajure Hurtado*, 29 I & N Dec. 216 (BIA 2025); see also Jennifer Whitlock, *Rapid Response Update on Bond Eligibility for Undocumented Immigrants* (Sept. 12, 2025), <https://www.nilc.org/resources/rapid-response-update-on-bond-eligibility-for-undocumented-immigrants/>.

²⁸ See *Matter of Yajure Hurtado*, 29 I & N Dec. 216 (BIA 2025); see also Jennifer Whitlock, *Rapid Response Update on Bond Eligibility for Undocumented Immigrants* (Sept. 12, 2025), <https://www.nilc.org/resources/rapid-response-update-on-bond-eligibility-for-undocumented-immigrants/>.

²⁹ Though the full list of such cases is too lengthy to provide in full, representative New York cases include *J.U. v. Maldonado*, No. 25-CV-04836 (OEM), 2025 WL 2772765 (E.D.N.Y. Sept. 29, 2025); *Savane v. Francis*, — F. Supp. 3d —, No. 1:25-CV-6666-GHW, 2025 WL 2774452 (S.D.N.Y. Sept. 28, 2025); *Samb v. Joyce*, No. 25 CIV. 6373 (DEH), 2025 WL 2398831 (S.D.N.Y. Aug. 19, 2025); and *Lopez Benitez v. Francis*, — F. Supp. 3d —, No. 25 CIV. 5937 (DEH), 2025 WL 2371588 (S.D.N.Y. Aug. 13, 2025).

immigration court. This procedure can now be used against most noncitizens who have arrived in the United States within the last two years. Though some protections against expedited removal exist, they are not accessible for large numbers of impacted immigrants. For example, immigrants placed in expedited removal proceedings may be able to exit the process if they pass a credible fear interview – in other words, if they can show that they are likely eligible for asylum. However, immigrants must affirmatively express fear of return to their country of origin to be given a credible fear interview, and many immigrants may not know that they should express fear of return or be able to adequately do so.

Being placed in expedited removal proceedings can be disastrous for impacted noncitizens. In addition to losing their opportunity to seek immigration relief before an immigration judge, noncitizens in expedited removal proceedings are generally subject to mandatory detention and cannot be released on bond. As discussed, being detained means both being exposed to inhumane conditions and losing easy access to key resources, including legal support. Moreover, noncitizens who receive an expedited removal order have limited opportunities to contest that order through traditional procedures, like *habeas* litigation³⁰ in federal court. Immigrants who have arrived in the United States less than two years ago thus face a much greater risk of irreparable harm due to the expansion of expedited removal.

ii. Pretermission of Asylum Applications in Immigration Court

On April 11, 2025, EOIR issued a Policy Memorandum, encouraging immigration judges to “premit” asylum applications in immigration court.³¹ “Pretermission” refers to the dismissal of an asylum claim without a full merits hearing. It can occur if the application is deemed legally insufficient – for example, because it is incomplete, or because the application does not meet the minimum legal requirements of a claim for asylum. Pursuant to this policy, DHS attorneys are increasingly moving to permit asylum applications on the basis that the application is legally insufficient, and judges are increasingly premitting asylum applications either on their own accord, or following a motion from a DHS attorney. An asylum seeker whose application is premitted will be left without an application for relief and stands at great risk of being ordered removed from the United States.

The threat of pretermission is especially great for unrepresented asylum seekers. Many of these individuals filed *pro se* asylum applications with the assistance of the AAHC, and many of these applications are vulnerable to pretermission because they usually contain only minimal information and may lack the requisite specificity or detail to withstand pretermission. While a represented asylum seeker would generally have their application reviewed by an attorney for sufficiency, who could also help in amending a previously submitted application, *pro se* asylum applicants do not have access to this level of support. Therefore, unrepresented asylum seekers are at particular risk of having their applications dismissed and being ordered removed without a pending application for immigration relief.

³⁰ As discussed, a *habeas* petition is used to seek release from detention.

³¹ Sirce E. Owen, Acting Director of EOIR, *Pretermission of Legally Insufficient Applications for Asylum*, PM 25-28 (Apr. 11, 2025), <https://www.justice.gov/eoir/media/1396411/dl?inline>

In addition to pretermission based on the sufficiency of the application, asylum seekers are also at risk of pretermission based on the possibility of removal to a third country. Federal law allows for noncitizens to be ordered removed to a third country (i.e., a country to which they have no connection) in limited circumstances, though historically, third country removals have happened only infrequently. Under the Trump Administration, however, attempts at third country removals have increased significantly, prompting litigation that reached the U.S. Supreme Court.³² To facilitate third country removals, the Administration has signed Asylum Cooperative Agreements (“ACAs”) with a growing number of countries, through which those countries agree to accept foreign nationals removed from the United States. In light of these ACAs, DHS attorneys are also increasingly moving to pretermite asylum applications on the basis that the noncitizen could be removed to a third country. Asylum seekers whose applications are pretermitted in this way are not only at risk of losing their opportunity to apply for asylum and being forced to leave the United States, but are also at risk of being forcibly moved to a country to which they have no connection at all.

iii. Creation of Exorbitant Fees for Applications for Humanitarian Relief

On July 4, 2025, Trump signed the H.R. 1, the “One Big Beautiful Bill Act,” into law, creating a new set of unwaivable fees for immigration applications, including applications for humanitarian relief.³³ Applicants for asylum must now pay \$100 to file their initial applications, and \$100 per year for each year that their application remains pending – despite the fact that immigration court and USCIS backlogs mean years can pass between when an asylum applicant submits their application and when a decision is reached.³⁴ Applicants for asylum-based work permits must now pay \$550 to file their initial applications, and \$795 to file applications to renew their work authorization.³⁵ Applicants for Temporary Protected Status (“TPS”) must pay \$580, while applicants for SIJS must pay \$250.³⁶ If a noncitizen is eligible to adjust their status, they now must pay \$2,940 to do so if the application is filed with the immigration court.³⁷

Moreover, noncitizens wishing to contest decisions made by the immigration court must also now pay significant fees, such as a \$1,010 fee if appealing a non-bond related decision to the BIA and a \$1,045 fee for many types of motions to reopen or reconsider an immigration court

³² See *Dep’t of Homeland Security v. D.V.D.*, 606 U.S. ___, No. 24A1153 (June 23, 2025).

³³ H.R. 1 also contained several other anti-immigrant provisions, including providing nearly 100 billion dollars in total for immigration enforcement in various forms. See Heidi Altman et. al., *The Anti-Immigrant Policies in Trump’s Final “Big Beautiful Bill,” Explained*, Nat’l Immigr. Law Center (Aug. 20, 2025), <https://www.nilc.org/resources/the-anti-immigrant-policies-in-trumps-final-big-beautiful-bill-explained/>; see also Nat’l Immigr. Project, *Comparison Chart of the Immigration-Related Fee Changes Brought by H.R. 1, The So-Called One Big Beautiful Bill Act*, (Sept. 16, 2025), <https://nipnlg.org/sites/default/files/2025-07/Final-Fee-Increases-HR1.pdf>.

³⁴ Nat’l Immigr. Project, *Comparison Chart of the Immigration-Related Fee Changes Brought by H.R. 1, The So-Called One Big Beautiful Bill Act*, (Sept. 16, 2025), <https://nipnlg.org/sites/default/files/2025-07/Final-Fee-Increases-HR1.pdf>.

³⁵ *Id.* If the applicant files online rather than on paper, the application fee is reduced to \$745.

³⁶ Nat’l Immigr. Project, *Comparison Chart of the Immigration-Related Fee Changes Brought by H.R. 1, The So-Called One Big Beautiful Bill Act*, (Sept. 16, 2025), <https://nipnlg.org/sites/default/files/2025-07/Final-Fee-Increases-HR1.pdf>.

³⁷ *Id.*

case or decision.³⁸ If a noncitizen is ordered removed *in absentia* and is later arrested by ICE, the noncitizen must pay a \$5,000 fee, assuming the *in absentia* order is not later rescinded.³⁹

These fees are prohibitively expensive for many immigrants. This is particularly true for immigrants who do not yet have work authorization, which now costs hundreds of dollars to even request and is no longer attainable for youth with SIJS following the end of deferred action for Special Immigrant Juveniles, as discussed. As a result of these new fees, some immigrants will surely be priced out of applying for protections to which they are entitled, solely due to their inability to pay.

III. The City Must Address the Multiple and Intersecting Needs of Immigrants to Ensure that Our Community Members are Protected and Respected

a. Young Recent Immigrants Need Competent, Full-Scope Legal Service Providers

The significant risks posed to immigrants under the current administration are especially great for recent immigrants who do not have legal representation, and who must therefore navigate the complicated immigration process alone. Many of these individuals—including many young people—are still stuck on long wait lists for legal representation, as organizations that specialize in this work have limited capacity to take on new cases.

Now more than ever, it is vital that immigrants receive free and competent legal services. Door staff members have noticed that immigration hearings are being scheduled particularly quickly, leaving immigrants with even less time than usual to find a lawyer. Without a lawyer, it can be difficult—or even impossible—for a noncitizen to successfully self-petition for relief, even if they have an extremely strong case. Additionally, many of these noncitizens who are unable to find legal representation are in removal proceedings, meaning that they risk being removed to the very country that they fled to get here. As discussed, immigrant youth are often fleeing horrific situations, and for many, being returned to their home country could be deadly.

Further, there is an additional and new need for competent, full-scope representation in federal *habeas* litigation for detained immigrants. The rise in immigration enforcement and expansion of mandatory detention mean that *habeas* litigation has increasingly become the only means of securing a detained immigrant's release from detention. Having access to competent representation could be the difference between an immigrant being able to return to their community or being indefinitely detained – or worse, removed from the United States.

i. Limitations in the Pro Se Plus Model

Although resources like the former Red Cross Asylum Application Help Center, or the current *pro se* plus project run by Resources, Opportunities, Connections & Community (“ROCC”), can be helpful for young people filing initial immigration applications, these resources are not equipped to provide young people with the level of support they need to navigate their immigration cases, especially in the context of the current erosion of immigrants' rights.

³⁸ *Id.*

³⁹ *Id.*

Particularly for immigrants involved in immigration court, legal support that falls short of full representation is simply not adequate, in no small part because these noncitizens are at the risk of being removed from the United States. For example, and as discussed, *pro se* projects are not equipped to support immigrants at risk of having their asylum application pretermitted, or who must respond to RFEs to prevent the denial of their SIJS applications, or who are arrested and detained by ICE. Immigrants need comprehensive legal services, and it is necessary for the City to continue to provide funding to such legal services providers or other competent immigration lawyers to meet such a great need.

b. Immigrants Living in Shelter Need Increased Protections

Recent immigrants are not only vulnerable due to their life experiences prior to arriving in the United States, but also due to their living situations here in New York. Many recent immigrants arrive in New York without a safe or stable place to live. As a result, they – like so many other members of our community – turn to the City’s shelter system for support. While the City has largely closed shelters meant exclusively for recently arrived immigrants (Humanitarian Emergency Response and Relief Centers (HERRCs)), many recent immigrants have been absorbed into the Department of Homeless Services shelter system, or reside at Bruckner, a shelter for new New Yorkers in the Bronx.

Therefore, it is critical that the City take immediate steps to prevent ICE from threatening the tens of thousands of recent immigrants who live within the shelter system. For one, the City must develop policies and trainings to ensure that ICE does not access City shelters. The City must also take all possible measures to prevent ICE officers from surveilling shelter from offsite. The City must pay particular attention to the Bruckner shelter, as it is an alarmingly easy target for ICE raids. If ICE officers wish to find a large number of people who are unlikely to have legal status, they need only visit the Bruckner shelter. Therefore, the City must ensure that Bruckner residents remain safe and out of ICE’s reach.

Further, the City must ensure that immigrants’ data and personal information is kept confidential and inaccessible to the federal government. Although sanctuary policies currently prevent ICE from accessing information about people in shelters without a judicial warrant, the locations of shelters are public, and the City maintains personal information about those who are placed in shelters. It is thus imperative that the City take immediate steps to secure immigrants’ data and affirm its refusal to share such data with ICE.

Immigrants living in shelter are more than aware of the threat that ICE poses to their safety. Door members have recently expressed fears that they will be subject to ICE raids at their shelters. Some have even sought advice about whether they should leave shelter in favor of sleeping on the streets out of concern that remaining in shelter will lead to detainment and deportation. It is entirely unacceptable that these immigrants are suffering such emotional turbulence and trauma. It is within the City’s power to take steps that meaningfully alleviate these emotional hardships, and it is imperative that the City do so.

c. Young Immigrants Need Increased Protections in Order to Attend School

Just as they depend on safe access to shelters, young immigrants depend on safe access to New York City schools. Undocumented young people have a right to attend public school and are not required to provide documents related to immigration status to enroll.⁴⁰ In cases where young people are seeking Special Immigrant Juvenile Status (SIJS) as a pathway to achieving legal status in the United States, lack of school enrollment can present a barrier to receiving SIJS, making it extremely important that immigrant youth have safe access to education.

Even so, Door clients have expressed fear about attending school during the current administration. One client, who immigrated to New York during the first Trump Administration to join her mother, expressed that she was afraid to leave the house for weeks after her mother missed an immigration court hearing, even missing school. Although the client's case was separate from her mother's, she was afraid that she would be picked up by ICE while at school, and that her mother would consequently be detected and detained by ICE.

Other Door members have expressed fears that ICE will locate them at school and then attempt to remove them from the country. For a young person, such anxiety and detachment from formative educational activities can be detrimental, especially considering how many young people have already had interrupted formal education due to extenuating circumstances in their countries of origin. Many Door members have at some point been taken out of school to work, even as children, or have missed school due to poverty, distance, or fear of violence from community members who threaten them at school. For example, one Door member's father often made him miss school to work, then confiscated the money he earned at work. Living in New York City with his aunt and uncle, this same young person was able to graduate high school last year. Another Door client missed about a month of school in his home country after his younger brother was killed by police during a political demonstration, for fear that he would be a target if he left his house. Yet another Door client was unable to go to school for many years as a result of his poor financial situation after both of his parents died. Additionally, the journey to the United States can take weeks or even upwards of a month, during which time young people are exposed to difficult and often traumatic conditions, far away from their support systems. Considering these circumstances, it is extremely important that when young people arrive in New York City they are not prevented from exercising their right to attend school by fears that doing so would put them at risk of being detained or deported.

We urge the city government to circulate information that dispels fears around schools and assures new New Yorkers that schools will continue to be safe places where young New Yorkers can learn and engage in City life without fear that they or their communities will be put at risk by their attendance. It is also necessary that the City backs up these promises by enacting policies that affirm that ICE will not be allowed in and/or around our schools. New York City must remain a safe place for students regardless of immigration status.

d. Young People's Families and Communities are Vulnerable to Threats of Deportation

Many young immigrants, especially those involved in SIJS proceedings, depend on parents or guardians living in New York for financial support, guidance, emotional support, and overall

⁴⁰ *School Eligibility*, The City of New York (last visited Jan. 15, 2024), <https://portal.311.nyc.gov/article/?kanumber=KA-02974>

well-being. Young people often make the difficult journey to the United States to reunite with family members or close family friends who can take care of them, and it is a great relief for them to be able to live safely within their communities in New York. Other young people come to the United States on their own, forming important bonds and support networks with other recent immigrants.

The immigration status of a young person's mentors and adult family members is often of particular concern for young people applying for SIJS. In New York, the most common pathway to SIJS begins with obtaining family court orders appointing a legal guardian for the young person. An adult is legally allowed to serve as a legal guardian and support a young person's SIJS case regardless of their own immigration status. To be granted guardianship orders, the proposed guardian typically needs to attend family court and testify alongside the young person. The family court generally also requires that the proposed guardian, as well as every person over the age of 18 living in the proposed guardian's home, submit personal information so that a background check may be performed. Proposed guardians and adult household members are generally also required to be fingerprinted by the court.

Particularly in the last several months, Door staff have seen undocumented potential legal guardians decide to no longer move forward with the guardianship process out of concern that doing so would put them at risk of being arrested by ICE. Proposed guardians and youth alike are afraid to go to family courts because they believe that ICE may arrest them there, even though such an arrest would likely be unlawful under state and city law.

Undocumented potential guardians are also especially concerned about the fingerprinting requirement. In the past, fingerprints taken by New York family courts were shared with ICE, who used the information to detain and deport immigrants without legal status.⁴¹ As a result, undocumented people were all but prevented from becoming legal guardians, as the risk of detention or deportation was far too great. This in turn made it more difficult for young people to apply for SIJS.

Many young people who have recently arrived in New York do not have expansive community networks; in the initial stages of integrating into life in the city, they may have just one or two trusted adults who could serve as their legal guardians. In such cases, if a proposed guardian is undocumented and feels unsafe going through the family court process, there may be no one available to serve as a young person's guardian, thereby depriving them of the opportunity to receive the support of a legal guardian and to pursue their legal right to SIJS. This is deeply unfair. A young person's family members and friends should not be put at risk because the young person is pursuing legal immigration relief. Similarly, a young person's opportunity to pursue immigration relief should not be jeopardized by the requirements of the very proceedings that would result in relief. To allow undocumented individuals to support young people by becoming guardians, and to protect the right of youth to pursue immigration relief, the City must continue to adopt policies that prevent family courts from sharing information with the federal government. Information shared with New York City family courts must remain confidential and inaccessible to immigration officials.

⁴¹ See *Secure Communities*, Immigr. and Customs Enforcement (May 10, 2024), <https://www.ice.gov/secure-communities>.

IV. Vulnerable Young People are Endangered by Immigration-Related Mis- and Dis-Information

In tandem with nonprofits and mutual aid organizations, the city government also has a responsibility to provide accurate, accessible information to young people so that they may engage in city life with relative peace of mind. This includes providing continued funding to legal services organizations and immigrant rights organizations so that they have capacity to provide know-your-rights trainings to immigrant young people. Further, the City Council should proactively dispel misinformation about immigrants and immigration on their website and on social media.

a. Immigration to New York City is Mischaracterized to the Public

A lack of clear and accessible information describing what it means for New York to be a “sanctuary city” and intentional mis- and disinformation about immigrants, spread by both the media and the public, produces an environment in which citizens and immigrants alike are unclear on what protections exist for new New Yorkers. This misinformation makes it difficult for new New Yorkers to safely and confidently access the benefits that do indeed exist for them, including those to which they are legally entitled.

Many of these immigrants (including those without legal status) are legally allowed to receive benefits and social services. As a sanctuary city, New York City allows all individuals without regard to their immigration status to access important, basic, necessary services like healthcare, shelters, education, and access to food. The law has made it clear that everyone, *regardless of immigration status*, is entitled to basic human rights and necessities like food and shelter.

b. Immigrants Often Lack Access to Critical Information due to Language and Literacy Barriers

On top of xenophobic mis- and disinformation, a lack of widely available, detailed, accurate information in the many languages spoken by new immigrants makes it difficult for them to be empowered in their knowledge of their rights. Such lack of information creates disproportionate fear around possible encounters with ICE and other law enforcement agencies, which makes it difficult for recent immigrants to safely go about their lives and access the services and spaces that they are legally allowed to access. It also creates fear about going to important appointments such as immigration court dates or ICE check ins, where a missed appointment could also mean a deportation order *in absentia*.

While there are many know-your-rights materials available to immigrants, these materials must be tailored to a non-legal audience to truly permit youth to understand their cases and advocate for themselves. This is of particular concern for the very many youth who have experienced interruptions to their formal educations and may have more limited literacy levels. Thus, it is imperative that the City actively support the creation of quality know-your-rights materials in a variety of languages and formats, including formats accessible to those with low literacy levels and/or with disabilities.

Without quality information available from trusted sources, Door members have reported turning to informal networks to learn the state of immigration policy. For instance, Door members report joining large WhatsApp group chats with names like “asylum” or “immigration,” where other recent immigrants from similar backgrounds share advice, or watching TikTok videos (usually from non-lawyers) about immigration law. While that advice is almost always well-meaning, it is too often misinformed. For example, Door members have reported being warned via WhatsApp about ICE raids at school and have consequently developed fears around going to school. If these individuals were instead provided with timely, accurate, and comprehensible information in their native languages, they would not be forced to rely on informal means to learn crucial information. The City has a responsibility to ensure that such quality information is in fact provided to immigrants and made widely available to all New Yorkers.

c. As a Result, Immigrants Are Vulnerable to Becoming Victims of Scams

Because immigrants are often not well-informed about their rights or about immigration law generally, they risk falling victims to dishonest or incompetent actual or purported immigration lawyers. At The Door, we have met many young people who paid thousands of dollars to someone claiming to understand immigration law for help preparing their asylum application, only to later find out that the submitted application was entirely insufficient or incomplete. Similarly, Door members have reported reviewing applications following their submission, only to find that the preparer fabricated large portions of their application or did not understand the immigrant’s story, due to language barriers or otherwise. Since many immigrants accessing these services do not fully understand English, they may not realize that there is a problem with their application until they have the opportunity to review it with the assistance of an interpreter, which may be months or even years after the application has been submitted. Given the rise in scrutiny and risk of pretermission of asylum applications, as discussed above, immigrants who fall victim to these scams are at great risk of having their asylum cases dismissed and being ordered removed.

Immigrants are additionally harmed by private attorneys who agree to represent them in court but are not actually competent to practice immigration law. Door staff have spoken with dozens of youth who report that their private attorneys have made substantive and procedural mistakes, given them inaccurate advice or information, or otherwise endangered the youth’s immigration case due to a lack of competency. Even though these attorneys are not capable of providing adequate representation to a young person in their immigration case, they nonetheless charge thousands of dollars to youth in legal fees. As a result, young people who retain these attorneys both lose a substantial sum of money and risk jeopardizing their immigration case.

V. Conclusion

As a sanctuary city, New York has a proud legacy of protecting its immigrant population, ensuring that they have access to critical services and the opportunity to thrive. However, this legacy is under attack, and vulnerable young people are bearing the brunt of these challenges. We urge the City Council to take decisive action to reaffirm and strengthen New York City’s sanctuary policies, protect immigrant youth from harmful displacement and systemic barriers, and prioritize accurate, accessible information for all immigrants. By doing so, the City can

continue to uphold its values of inclusion, equity, and humanity, ensuring that immigrant youth can build secure, fulfilling lives while contributing to the vibrant fabric of New York City.

Thank you.



Celina Muñoz
Paralegal & DOJ-Accredited Representative
The Door's Legal Services Center



Ellinor Rutkey, Esq.
Staff Attorney
The Door's Legal Services Center

**TESTIMONY BEFORE NEW YORK CITY COUNCIL'S
COMMITTEE ON IMMIGRATION**

Submitted on October 31, 2025

My name is Deborah Lee, and I am the Attorney-in-Charge of the Immigration Law Unit at The Legal Aid Society (LAS). Thank you to the Committee on Immigration for the opportunity to submit testimony.

LAS is built on one simple but powerful belief: that no New Yorker should be denied the right to equal justice. We want to remain a beacon of hope for New Yorkers who feel neglected, regardless of who they are, where they come from, or how they identify. From our start nearly 150 years ago, our growth has mirrored that of the city we serve. Today, we are proud to be one of the largest and most influential social justice law firms in New York City and nation-wide. Our staff deliver justice in every borough, working tirelessly to defend our clients and dismantle the hidden, systemic barriers that can prevent them from thriving. As passionate advocates for individuals and families, LAS is an indispensable component of the legal, social, and economic fabric of our City.

In the past year, LAS served over 480,000 individuals and their families who benefitted from our holistic direct services through our Civil, Criminal, and Juvenile Rights Practices. Our work across these Practices together provides us with unique insights into the challenges facing marginalized communities in NYC and an unparalleled ability to effect change on a greater scale. Our Civil Practice works with low-income New Yorkers experiencing a broad range of civil legal issues that, without assistance, can escalate into situations with cascading effects that threaten their stability and keep families locked in cycles of poverty. Our specialized units cover the full spectrum of civil legal needs, including housing and homelessness; homeowner stabilization, family law and domestic violence; immigration; special education; health; community development; consumer issues; employment; government benefits and disability; taxes; and holistic services for vulnerable populations including the elderly, adults and children with disabilities, and people living with HIV/AIDS.

For almost 40 years, LAS has maintained a citywide Immigration Law Unit (ILU) within the Civil Practice. ILU, now comprised of nearly 100 staff, is a recognized leader in the delivery of free, comprehensive, and high caliber immigration legal services to low-income immigrants in New York City and surrounding counties. Staff represent immigrants before U.S. Citizenship and Immigration Services (USCIS), in Immigration Court removal proceedings before the Executive Office for Immigration Review (EOIR), on appeals to the Board of Immigration Appeals (BIA), and in federal court on habeas corpus petitions and petitions for review. In addition to representing clients, staff conduct outreach clinics at community-based organizations throughout New York City, intake clients at immigration detention centers, and conduct trainings in various venues throughout the city. Over the most recent fiscal year, ILU assisted in nearly 8,600 individual legal matters benefiting over 22,000 New Yorkers citywide. In addition to providing direct legal services, ILU staff provide regular training to immigrant-serving advocates from community-based organizations, State and local agencies, and judicial and legislative staff. Partnerships with other non-profit organizations and coordination of a successful pro bono program with 53 participating law firms enable the ILU to maximize resources to meet the increasing demand for representation.

Thank you for your generous and increased support of our New York Immigrant Family Unity Project, which provides legal representation to non-citizen New Yorkers detained by the federal government and separated from their families here. We are also grateful for the funding of our Unaccompanied Minors and Families Initiative and other innovative programs to protect vulnerable New Yorkers in their time of greatest need. These investments truly reflect the Council's unwavering commitment to justice for all New Yorkers.

The prospects for detained noncitizens are dire. After detention, families may go days without knowing where their loved one is or how to reach them. Individuals may be held at 26 Federal Plaza, then transferred across the region—or even the country.

Beyond poor conditions and lack of access to counsel, the greatest threat detained noncitizens face today is the near-total elimination of bond. Most will remain in custody for months, often through multiple levels of appeal, with no guaranteed timeline for release. Of particular note are these multiple changes in precedential law and policy impacting who is mandatorily detained and thus not eligible

for release from immigration detention:

- On January 29, 2025, President Trump signed into law the Laken Riley Act, which subjects noncitizens to mandatory detention for a wide range of offenses, including low level theft and shoplifting offenses.¹ This mandatory detention would be triggered not only when someone has been convicted of certain offenses but also when merely accused of them.²
- On May 15, 2025, the administrative appellate body of the Immigration Courts nationwide, the Board of Immigration Appeals (“BIA”), issued a precedential decision in *Matter of Q. Li*.³ This decision broadened who may be subject to mandatory immigration detention to those who were “detained without a warrant while arriving in the United States, whether or not at a port of entry, and subsequently placed in removal proceedings.”⁴
- On July 8, 2025, ICE issued internal guidance that all noncitizens who are applying for admission are subject to mandatory detention pursuant to INA § 235.⁵ This will potentially lead to millions of individuals who will be subject to mandatory detention.⁶
- On September 5, 2025, the BIA issued another precedential decision in *Matter of Jonathan Javier Yajure Hurtado*,⁷ finding that Immigration Judges lack authority to consider bond for non-citizens who are present in the United States without admission.⁸ This now means that all non-citizens who entered without inspection⁹ are subject to mandatory detention, despite the length of time they have been present in this country.

¹ See Laken Riley Act, S.5, 119th Cong. § xx (2025), <https://www.congress.gov/119/plaws/publ1/PLAW-119publ1.pdf>.

² See *id.*

³ See 29 I&N Dec. 66 (BIA 2025), <https://www.justice.gov/eoir/media/1400431/dl?inline>.

⁴ See *id.* at 69.

⁵ See ICE Issues Memo Eliminating Bond Hearings for All Applicants for Admission, IMMIGR. POL’Y TRACKING PROJECT, <https://immpolicytracking.org/policies/ice-issues-memo-eliminating-bond-hearings-for-undocumented-immigrants/> (last visited October 31, 2025).

⁶ See Maria Sacchetti & Carol D. Leonnig, *ICE Declares Millions of Undocumented Immigrants Ineligible for Bond Hearings*, WASH. POST (July 15, 2025), <https://www.washingtonpost.com/immigration/2025/07/14/ice-trump-undocumented-immigrants-bond-hearings/>.

⁷ See 29 I&N Dec. 216 (BIA 2025), <https://www.justice.gov/eoir/media/1413311/dl?inline>.

⁸ See *id.* at 228–29.

⁹ See https://immigrantsrising.org/wp-content/uploads/Immigrants-Rising_Defining-Undocumented.pdf.

DHS is also aggressively appealing grants of status and blocking release at every turn, even for those who may have been granted immigration status or the right to release on bond by an Immigration Court judge. This results in noncitizens being detained for months or years, and effectively coerces many noncitizens to abandon their immigration case entirely and request their own deportation.¹⁰

For many, the only viable path to release is through habeas petitions in federal court. Immigration representation remains essential, and a robust habeas practice is now a critical, distinct tool to defend against removal. In our client's habeas case in *J.G.O. v. Francis, et al.*, which precisely tracks the federal immigration authorities' current efforts to block the release of virtually all noncitizens, the Hon. Arun Subramanian of the U.S. District Court for the Southern District of New York held that our client should be released immediately in accordance with the original Immigration Court and Board of Immigration Appeals decisions affirming his release on bond. The federal district judge here powerfully noted how our client's detention "has been improperly prolonged by a constantly moving set of goalposts. That ends now." We attach that publicly available decision to our testimony as a testament to a single New Yorker's struggle for justice and freedom.

Legal Aid is proud to have a federal litigation team for clients like J.G.O., but we are limited in the face of overwhelming need and are working hard to expand our capacity. All our noncitizen clients – and many other noncitizen New Yorkers – are at risk of being detained under this federal administration.

We are at a growing flashpoint. Detentions at court and ICE check-ins are increasing. Raids are happening blocks from City Hall. In particular, we are deeply disturbed by last week's ICE raids on Canal Street, where more than 50 federal agents carried out a militarized sweep targeting our noncitizen neighbors and fellow New Yorkers. This highly visible and aggressive action marks a disturbing escalation in federal enforcement tactics and continues to threaten what amounts to martial law in our city.

¹⁰ See National Immigrant Justice Center, Locked Away: The Urgent Need for Immigration Detention Bond Reform (May 2023), https://immigrantjustice.org/sites/default/files/content-type/research-item/documents/2023-06/NIJC-Policy-Brief_ICE-Bond-Reform_May-2023.pdf.

Alongside legal partners, and community members across the city, The Legal Aid Society is actively monitoring developments and working to coordinate a collective response. As we continue to assess the impact of the attack on Canal Street, we are also discussing how best to support affected community members and how to defend our non-citizen neighbors not only with legal representation, but critical and reliable legal information that they can rely upon in this moment. We remain steadfast in our commitment to defending New York and New Yorkers—and we will not be intimidated.

In the face of this, we stand in strong support of Council Member Cabán's Resolution 1014, which condemns the use of a federalized National Guard. We commend the New York City Council for choosing to stand on the right side of history by condemning the Trump Administration's anti-immigrant and anti-democratic agenda. Let us continue to fight together against the ever-increasing erosion of our civil liberties.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Deborah Lee', with a stylized, flowing script.

Deborah Lee
Attorney-in-Charge
Immigration Law Unit
The Legal Aid Society

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

J.G.O.,

Petitioner,

-against-

LaDeon Francis et al.,

Respondents.

25-CV-7233 (AS)

OPINION AND ORDER

ARUN SUBRAMANIAN, United States District Judge:

This is a habeas petition brought by a noncitizen, J.G.O., who was released from detention on bond by an Immigration Judge (IJ). The IJ's decision was initially affirmed by the Board of Immigration Appeals (BIA). But then, based on a series of shifting rationales, his release was repeatedly withheld. That ends here. The Court GRANTS the petition and orders J.G.O.'s release on the terms set by the IJ.

BACKGROUND

J.G.O. is a noncitizen who came to the United States in 2022 from Venezuela. Dkt. 1-3 at 1. He was arrested shortly after entry and detained under 8 U.S.C. § 1226(a). Dkt. 12-2 at 1. He was then released on his own recognizance without any conditions. Dkt. 12-3 at 1. Over the next two and-a-half years, J.G.O. lived in the United States, worked as a construction worker, and applied for asylum. Dkt. 1-3 at 1, 5. In early 2025, he was again arrested and detained by ICE while living in New York City. Dkt. 1-2 at 3. That kickstarted a Kafkaesque process of attempted removal and detention.

The government first tried to get J.G.O. out of the country by putting him on a plane to a megaprison in El Salvador without a hearing or any other process. Dkt. 1-2 at 3–4. While J.G.O. was on the tarmac, a federal court ordered the government not to remove him and others who had sued to enjoin their removal. Dkt. 1-2 at 4; *J.G.G. v. Trump*, 25-cv-766 (D.D.C. Mar. 15, 2025). That was followed by a nationwide injunction, from which the government sought an emergency stay. The government lost in the D.C. Circuit, but then got the stay from the Supreme Court, which held that the plaintiffs needed to file for habeas relief in their own judicial districts. *J.G.G. v. Trump*, 2025 WL 914682 (D.C. Cir. 2025); *Trump v. J.G.G.*, 604 U.S. 670, 672 (2025). J.G.O. filed a petition here, in the Southern District of New York, and was granted an injunction against his removal. *G.F.F. v. Trump*, 2025 WL 1301052 (S.D.N.Y. May 6, 2025).

In the meantime, J.G.O. pursued his release from detention. The government claimed that it had detained him under 8 U.S.C. § 1226(c), which doesn't allow for release of any sort. But

§ 1226(c) applies only to noncitizens who meet certain other criteria, most of which involve committing a crime. The government argued that J.G.O. was a member of Tren de Aragua, which the State Department had designated a terrorist organization a few months earlier. If true, then J.G.O. wouldn't qualify for bond, at least as a matter of statute. 8 U.S.C. § 1226(c)(1)(D) (cross-referencing 8 U.S.C. § 1182(a)(3)(B)). The IJ rejected that argument, finding “extremely limited information that would tend to support the ... allegation that [J.G.O.] is a member of Tren de Aragua.” Dkt. 1-3 at 2. That led to the conclusion that J.G.O. was detained under § 1226(a), not (c), and so was eligible for bond pending removal. The IJ set bond at \$7,500. *Id.* at 6. The BIA dismissed the government's appeal. Dkt. 1-7.

Then J.G.O. tried to post bond. A community bail fund sent the money to ICE on his behalf. Dkt. 1-9 at 1. After accepting payment, ICE notified J.G.O. that his bond was denied for cryptic reasons—an “automatic stay” was in effect because “the date still [f]alls within the 5 day window of the automatic stay as per OPLA.” *Id.* Once five business days had passed, J.G.O. tried to pay his bond again. ICE accepted the payment and then denied bond again. This time, ICE stated only that it was “per EOIR.” *Id.* at 2. It turns out that the government had filed for a discretionary stay pending a motion for reconsideration before the BIA, but that J.G.O. hadn't been notified. Dkts. 1-8 at 2; 1 at 9–11.

J.G.O. proceeded to file another habeas petition, this time to be released from detention on the terms set by the IJ. Dkt. 1; 28 U.S.C. § 2241. But while this petition was pending, the ground shifted under him yet again. The BIA granted the government's motion for reconsideration on grounds never urged by the government. It held that J.G.O. wasn't detained under either § 1226(a) (as he argued) or § 1226(c) (as the government argued), but instead under § 1225(b)(2) (which also doesn't allow for bond). The government then argued in this Court that, because of the change in the state of play, J.G.O.'s entire habeas petition was moot and that he needed to file an amended one and do this all over again, again. The Court granted leave for J.G.O. to amend his petition, he filed an amended petition, and that petition is now up for the Court's review.

DISCUSSION

The central question in this case is which statutory provision J.G.O. is detained under. There are two potential options. Depending on which one applies, he is or isn't statutorily eligible for bond. The options are 8 U.S.C. § 1226(a) and 8 U.S.C. § 1225(b)(2). If J.G.O. is detained under § 1226(a) (as the IJ and BIA both initially found), then detention isn't mandatory. Instead, “the Attorney General ... may release the alien on bond.” 8 U.S.C. § 1226(a)(2)(A); 8 C.F.R. § 1236.1(d)(1) (regulation providing for bond). But if he's detained under § 1225(b)(2), then “the alien shall be detained”—in other words, no bond. 8 U.S.C. 1225(b)(2)(A).

This Court is far from the first to address this question. Across the country, the government has repeatedly engaged in the same behavior displayed here. It has detained noncitizens pursuant to § 1226(a), then, only afterward, argued that they were instead detained under § 1225(b)(2) and ineligible for bond. That has led to a raft of decisions, most of which have rejected the government's position. They are so numerous that only a handful are cited here as illustrative examples.

See, e.g., Lopez Benitez v. Francis, 2025 WL 2371588 (S.D.N.Y. Aug. 13, 2025) (rejecting the government’s position); *Martinez v. Hyde*, 2025 WL 2084238 (D. Mass. Jul. 24, 2025) (same); *Guerrero Orellana v. Moniz*, 2025 WL 2809996 (D. Mass. Oct. 3, 2025) (same); *Lepe v. Andrews*, 2025 WL 2716910 (E.D. Cal. Sept. 23, 2025) (same); *Artiga v. Genalo*, 2025 WL 2829434 (E.D.N.Y. Oct. 5, 2025) (same). To be sure, not *every* court has rejected this argument—the government identified two that adopted it, along with the BIA. *See, e.g., Chavez v. Noem*, 2025 WL 2730228 (S.D. Cal. Sept. 24, 2025); *Vargas Lopez v. Trump*, 2025 WL 2780351 (D. Neb. Sept. 30, 2025); *Matter of Hurtado*, 29 I. & N. Dec. 216 (BIA 2025). With that backdrop in mind, the Court proceeds to take a fresh look at the statutes at issue, § 1226(a) and § 1225(b)(2).

The provisions apply in different contexts. Section 1226(a) grants the government authority to detain an alien during removal proceedings. Its text is short and plain; it applies to “an alien ... pending a decision on whether the alien is to be removed from the United States.” 8 U.S.C. § 1226(a). When the government detained J.G.O., it started removal proceedings (that are still ongoing), so there’s no question that detention under 1226(a) would be proper.

The text of § 1225(b)(2) is much less straightforward. It requires detention of “an alien who is an applicant for admission, if the examining immigration officer determines that an alien seeking admission is not clearly and beyond a doubt entitled to be admitted.” 8 U.S.C. § 1225(b)(2)(A). That language clearly yields two requirements: The alien must be “an applicant for admission” and an immigration officer must determine that the applicant “is not clearly and beyond a doubt entitled to be admitted.” *Id.* But that doesn’t take account of all the statutory language; it also applies only to “an alien seeking admission.” The question, then, is whether that creates a third statutory requirement that the alien actively seek admission.

That question is puzzling at first blush. How can an “applicant for admission” not “seek admission?” This oddity is explained by the statutory definition of the phrase “applicant for admission.” *See Gustafson v. Alloyd Co., Inc.*, 513 U.S. 561, 585 (1995) (Thomas, J., dissenting) (“The canon that we construe a statutory term in accordance with its ordinary or natural meaning applies only in the absence of a statutory definition.” (cleaned up)). Section 1225(a) defines “applicant for admission” as: “[a]n alien present in the United States who has not been admitted or who arrives in the United States.” 8 U.S.C. § 1225(a). That definition doesn’t require an application of any sort. All that’s needed is presence without admission—in other words, it applies to the great number of undocumented immigrants who currently live here. By contrast, “seeking admission” might mean something more than that—some active desire or process toward admission. J.G.O argues that because he’s already here (and so cannot “seek admission”), § 1225(b)(2) can’t apply to him. He’s right.

To understand why, start with the text of the statute. It explicitly includes the phrase “seeking admission.” Because “courts must give effect, if possible, to every clause and word of a statute,” that phrase must take on some meaning that wouldn’t make it “superfluous,” considering the separate term “applicant for admission.” *Loughrin v. United States*, 573 U.S. 351, 358 (2014) (internal quotations omitted). What, then, does it mean to “seek admission?” The Immigration and Naturalization Act (INA) defines “admission” as “the lawful entry of the alien into the United States after

inspection and authorization by an immigration officer.” 8 U.S.C. § 1101(a)(13)(A). And “entry,” which is undefined, can be given its “ordinary, contemporary, common meaning.” *Star Athletica, LLC v. Varsity Brands, Inc.*, 580 U.S. 405, 414 (2017) (internal quotations omitted); *United States v. Santos*, 553 U.S. 507, 511 (2008) (“When a term is undefined, we give it its ordinary meaning.”). That meaning is “entering into ... (a country),” which is “[t]o come or go in.” *Entry*, OXFORD ENGLISH DICTIONARY (2d ed. 1989); *Enter*, OXFORD ENGLISH DICTIONARY (2d ed. 1989). In a more specific legal context, it also means going into a place. *Entry*, BLACK’S LAW DICTIONARY (6th ed. 1990) (“any coming of an alien into the U.S.”). And “seeking” is written in the present-progressive tense, which “is used to refer to an action or a state that is continuing to happen.” *Progressive Tense*, MERRIAM WEBSTER ONLINE, <https://www.merriam-webster.com/dictionary/progressive%20tense> (last visited October 27, 2025). Putting that all together, “seeking admission” requires an alien to *continue* to want to *go into* the country. The problem, as J.G.O. points out, is that he’s already here; you can’t go into a place where you already are.

The government’s attempt to explain away this verbiage backfires. It points to another part of the statute that reads: “aliens who are applicants for admission or otherwise seeking admission.” Dkt. 26 at 9 (citing 8 U.S.C. § 1225(a)(3)). That’s supposed to suggest that the two categories are coterminous. But that’s not how lists work or how the word “or” works. Its “ordinary use is almost always disjunctive, that is, the words it connects are to be given separate meanings.” *Loughrin*, 573 U.S. at 357 (quoting *United States v. Woods*, 571 U.S. 31, 45 (2013)). Similarly, “otherwise” means “something or anything else.” *Otherwise*, MERRIAM WEBSTER’S COLLEGIATE DICTIONARY (10th ed. 2001). Taken together, “or otherwise” is “used to refer to something that is different from something already mentioned.” *Or otherwise*, MERRIAM WEBSTER ONLINE, <https://www.merriam-webster.com/dictionary/or%20otherwise> (last visited October 27, 2025). On top of that, this is just another example of the government’s construction inviting surplusage into the statute. That Congress chose to include this additional phrase—“seeking admission”—not once but (according to the government) multiple times suggests that it must mean something distinct.

That reading of the words in § 1225 is buttressed by their “context and ... their place in the overall statutory scheme.” *Gundy v. United States*, 588 U.S. 128, 141 (2019) (internal quotations omitted). Start with their context. Every part of § 1225 suggests that it applies to aliens who are arriving in the country. Section 1225(b)(2) is suggestively titled “*Inspection of other aliens*,” referring to a process that occurs when somebody *arrives* in this country. 8 U.S.C. § 1225(b)(2) (emphasis added); 8 C.F.R. § 235.1(a). Then the provision goes on to provide more contextual evidence. It lays out a list of aliens who are *excluded*: crewmen, stowaways, and other arriving noncitizens with fraudulent or defective documentation. *See id.* § 1225(b)(2)(B). Each class of people on that list includes somebody who is entering the country, not somebody who’s already here; and though the list is one of exceptions, it’s suggestive of the type of person who’s meant to be covered. That same theme is repeated in the very next subsection after that list, § 1225(b)(2)(C). It describes the “[t]reatment of aliens arriving from contiguous territory” under § 1225(b)(2), again indicating that people arriving from a contiguous country make up a subset of *arriving* people, the group covered by § 1225(b)(2) more generally.

Next consider the statutory scheme. J.G.O.’s construction of § 1225 fits neatly with § 1226, which governs the “[a]pprehension and detention of aliens.” 8 U.S.C. § 1226. Together, they cover aliens presenting at arrival (under § 1225) and then everybody else (under § 1226). And just as § 1225 is littered with language that would apply only to arrivals, § 1226 is filled with language that would most clearly apply to people who are already here. For example, it applies only when the Attorney general has “issued” a “warrant.” 8 U.S.C. § 1226(a). It requires the Attorney General to take the alien into “custody.” *Id.* § 1226(c)(1). And it incorporates a series of U.S. common law crimes. *See, e.g.*, 8 U.S.C. § 1226(c)(1)(E)(ii), (2) (referencing “burglary, theft, [and] larceny,” which “have the meanings given such terms in the jurisdiction in which the acts occurred”). Put simply, § 1226 “generally governs the process of arresting and detaining” aliens “once inside the United States” “pending their removal.” *Jennings v. Rodriguez*, 583 U.S. 281, 288 (2018).

That neat schema is further confirmed by § 1226’s amendment history. In early 2025, Congress amended the statute. At the time, § 1226(c) provided for the mandatory detention of an alien “present in the United States without being admitted or paroled” who had committed certain offenses (for example, a crime of moral turpitude). 8 U.S.C. § 1226(c)(1)(E) (cross-referencing the quoted text in § 1182(a)(6)(A)). Congress expanded that list of offenses by adding “burglary, theft, larceny, shoplifting” and a few other crimes. Laken Riley Act, Pub. L. 119-1 at 1. That portion of the amendment would have had no legal effect under the government’s reading because the mandatory detention of those very same people would have been required under § 1225 without some additional crime. So the government is wrong that no part of § 1226 is rendered redundant by its proposed construction of § 1225.

Against all that, the government argues that J.G.O.’s construction is “at odds” with the “entry fiction.” Dkt. 26 at 9. But the entry fiction isn’t relevant to this analysis. The entry fiction is a doctrine that dictates what *constitutional* rights are due to a noncitizen who is physically present in the United States (for example, because of detention or parole) but hasn’t been lawfully admitted. *Nishimura Ekiu v. United States*, 142 U.S. 651, 661 (1892). Under this doctrine, “whatever the procedure authorized by Congress is, it is due process.” *Shaughnessy v. United States ex rel. Mezei*, 345 U.S. 206, 212 (1953). Here, the question is what procedure Congress authorized. So even assuming that the entry fiction would apply to J.G.O., it wouldn’t affect this *statutory* analysis.

But the entry fiction wouldn’t apply to J.G.O. in the first place. Even though the fiction stretches to noncitizens stopped at or near the border, J.G.O. was arrested and detained in New York, nowhere near Texas (where he crossed). The government suggests that the relevant arrest was not this one, but his first one—all the way back in 2022. If he was paroled, the argument goes, then the entry fiction still applies. *See Leng May Ma v. Barber*, 357 U.S. 185, 190 (1958). But that argument is flatly inconsistent with the record. J.G.O. wasn’t released on parole. He was released on his “own recognizance.” Dkt. 12-3 at 1. Release on your own recognizance isn’t parole “into the United States,” which “permits a non-citizen to physically enter the country, subject to a reservation of rights by the Government that it may continue to treat the non-citizen ‘as if stopped at the border.’” *Martinez*, 2025 WL 2084238, at *3 (quoting *DHS v. Thuraissigiam*, 591 U.S. 103,

139 (2020)); 8 U.S.C. § 1182(d)(5)(A). It “instead releases a non-citizen already in the country from domestic detention.” *Martinez*, 2025 WL 2084238, at *3. So the entry fiction is irrelevant twice-over.

* * * * *

Where does that leave J.G.O.? He was granted bond by the IJ and the BIA dismissed the government’s appeal. The BIA changed its mind on reconsideration, but in doing so it consciously declined to re-examine its prior reasons for dismissing the appeal, even in the alternative. Instead, it did something that even the government wasn’t urging in J.G.O.’s case. It held that a different statute applied and that bond wasn’t available at all, a determination that—as addressed here—was legally wrong and is entitled to no deference. *See Loper Bright Enters. v. Raimondo*, 603 U.S. 369 (2024).

Further, as the government agrees, neither the automatic nor the discretionary stay of the IJ’s order releasing J.G.O. on bond is in place. Given this Court’s holding that J.G.O. is being detained pursuant to § 1226(a), and not § 1225(b)(2), he should be released on bond in accordance with the original decisions of the IJ and BIA. Because the Court rests on this statutory holding (and because the parties agree that any other analysis would be unnecessary), it need not address J.G.O.’s constitutional arguments, arguments under the APA, or those about the innate power of the Court to compel J.G.O.’s release.

CONCLUSION

J.G.O.’s detention has been improperly prolonged by a constantly moving set of goalposts. That ends now. The petition is GRANTED and J.G.O. is ordered to be immediately released in accordance with the terms of bond imposed by the IJ.

SO ORDERED.

Dated: October 28, 2025
New York, New York


ARUN SUBRAMANIAN
United States District Judge

October 28, 2025

The Honorable Alexa Avilés

Chair, Committee on Immigration

250 Broadway

New York, NY 10007

**Testimony of the Vera Institute of Justice Regarding
“Oversight – Legal Services for Immigrant New Yorkers”
Submitted to the Committee on Immigration of the New York City Council**

Dear Chairperson Avilés,

On behalf of the Vera Institute of Justice, I write to highlight New York City’s urgent need to strengthen its immigration legal services ecosystem, as well as the need to implement long-term solutions that build a sustainable legal service infrastructure. These investments are essential to support immigrant New Yorkers, who are integral to the city’s communities, families, and economy.

In the face of unprecedented federal immigration enforcement, it is more crucial than ever to ensure that all immigrants at risk of deportation in New York have access to legal support and the city continues its legacy as a national leader in protecting immigrant communities. Current challenges and shortcomings in the immigration legal services field demonstrate the need for solutions on both a state and city level. New York State must pass the Access to Representation Act, the Building Up Immigrant Legal Defense (BUILD) Act, the New York for All Act, and the Dignity Not Detention Act. We also call on New York City to support the expansion of NYIFUP funding to include representation for New Yorkers transferred to out-of-state ICE facilities. Finally, we support New York Immigration Coalition’s priorities of **increased interagency coordination, a de-siloed approach to legal services, and the creation of a support fund** to assist individuals and families of NYC residents impacted by deportation and detention.

Vera works to end mass incarceration, protect immigrants’ rights, ensure dignity for people behind bars, and build safe, thriving communities. A core priority of our work is advancing universal representation to ensure that no immigrant is forced to face detention and deportation

without access to legal counsel. Expanding access to legal support not only promotes fairness and dignity by allowing everyone a fair chance to exercise their rights, but is also a common-sense investment in New York City’s long-term economic strength and community stability.

Immigrant New Yorkers are in urgent need of legal services.

Hundreds of thousands of New Yorkers are currently ensnared in the United States’ detention and deportation machinery. An enormous—and growing—immigration court backlog causes long delays for people trying to defend their rights, secure immigration relief, or obtain work authorization. Across New York State, many immigrants face these highly complex and slow-moving systems alone: as of August 2025, 109,364 of approximately 337,362 pending cases in New York immigration courts—nearly one in three—are unrepresented.¹ Meanwhile, detentions have nearly doubled in the past year.² In the face of a broken federal immigration system, state and local governments must lead by implementing policies that protect immigrant communities, promote family unity, and support economic stability.

Immigrants are essential to New York’s social fabric and economic future.

Immigration is inseparable from New York’s history, identity, and culture—and it remains essential to its future growth and vitality. Today, immigrants make up 30 percent of the city’s population—a total of 5.9 million people—and contribute over \$31.3 billion in combined state and local taxes each year.³ In New York City, 67 percent of the metro area's immigrants participate in the labor force, compared to 64 percent of U.S.-born residents.⁴ Their contributions sustain local businesses and industries, and enrich all aspects of civic life. Investing in immigration legal services will ensure that immigrant New Yorkers and the city as a whole can continue to thrive.

¹ Vera Institute of Justice, “Immigration Court Legal Representation Dashboard,” accessed October 17, 2025, <https://www.vera.org/ending-mass-incarceration/reducing-incarceration/detention-of-immigrants/advancing-universal-representation-initiative/immigration-court-legal-representation-dashboard>. In August 2025, there were 1024 people with cases before New York immigration courts in detention, compared to 602 people in August 2024.

² Ibid.

³ Vera Institute of Justice, “Profile of Immigrants in New York,” March 2025, https://vera-institute.files.svdcdn.com/production/downloads/publications/New_York_City_Immigrant_Population_Profile.pdf?dm=1748637299

⁴ Ibid.

New York must continue its track record of welcoming immigrants and protecting their rights

New York has long been a trailblazer in protecting immigrant communities through investments in legal representation. In 2013, the city launched the New York Immigrant Family Unity Project (NYIFUP), the nation's first pilot program to provide publicly funded deportation defense to detained immigrants under a universal representation model—meaning representation was based solely on financial need.⁵ NYIFUP expanded statewide in 2017 and is now replicated in more than 50 jurisdictions nationwide.⁶ Programs like NYIFUP remain widely popular: a 2020 poll found that 93 percent of New Yorkers—including 99 percent of New York City residents—support government-funded lawyers for people in immigration court.⁷

Solutions that guarantee access to counsel are proven and effective. Legal representation gives immigrants a fighting chance in an incredibly complex system, with stakes as high as permanent family separation or deportation to potentially life-threatening danger abroad. People in detention with legal representation are up to 10.5 times more likely to have a successful case outcome than those who are unrepresented.⁸ Among non-detained immigrants, 60 percent with counsel achieve a successful outcome, compared to just 17 percent of those unrepresented.⁹ New York must increase funding to expand NYIFUP's capacity so that any detained New Yorker, regardless of where they are transferred, can be supported by services.

New York City must support long-term legal services infrastructure:

A more just and humane system begins with ensuring that fewer people are subjected to the danger of deportation and detention in the first place. We commend the City Council for passing

⁵ Jennifer Stave, Peter Markowitz, Karen Berberich, et al., *Evaluation of the New York Immigrant Family Unity Project: Assessing the Impact of Legal Representation on Family and Community Unity* (New York: Vera Institute of Justice, 2017), <https://www.vera.org/publications/new-york-immigrant-family-unity-project-evaluation>.

⁶ Vera Institute of Justice, "The New York Immigrant Family Unity Project," updated July 2023, <https://www.vera.org/ending-mass-incarceration/reducing-incarceration/detention-of-immigrants/new-york-immigrant-family-unity-project#>.

⁷ Vera Institute of Justice, *Public Support in New York State for Government-Funded Attorneys in Immigration Court* (New York: Vera, 2020), <https://www.vera.org/downloads/publications/taking-the-pulse-new-york.pdf>.

⁸ Emily Ryo, "Detained: A Study of Immigration Bond Hearings," *Law & Society Review* 50, no. 1 (2016), [jstor.org/stable/44122502](https://www.jstor.org/stable/44122502) (un-paywalled pre-publication version accessible at papers.ssrn.com/sol3/papers.cfm?abstract_id=2628962)

⁹ Ingrid V. Eagly and Steven Shafer, "A National Study of Access to Counsel in Immigration Court," *University of Pennsylvania Law Review* 164, no. 1 (2015), 9, perma.cc/82F5-WE2D.

resolutions urging New York State to enact two bills—the **Dignity Not Detention Act** and the **New York for All Act**—that would shrink the immigration dragnet.¹⁰ While these measures will reduce detention and protect civil rights, more comprehensive steps are needed to build lasting justice for New York’s immigrants.

To ensure lasting access to counsel, New York City must call for the passage of the **Access to Representation Act (ARA)**, state legislation that would establish a right to counsel for all New Yorkers facing deportation. The ARA outlines a responsible six-year process to expand legal services capacity, enabling providers to grow staffing and infrastructure sustainably. Once implemented, the ARA will guarantee that anyone at risk of deportation in New York—whether newly arrived or with longstanding roots—has a fighting chance to defend their rights, remain with their family, and stay connected to their community and livelihood.

In the short-term, the city should also support the passage of the **Building Up Immigrant Legal Defense (BUILD) Act**, which would fund legal services providers to scale programs, recruit and retain staff, and expand training and wraparound services. Together, these measures will lay the foundation for a robust and durable legal defense system across the state.

These investments are especially critical now, as President Trump’s mass deportation plans have already separated families, subjected people to inhumane detention, and uprooted longtime residents from their homes. By safeguarding our communities and the future of our state, investments in legal services will benefit all New Yorkers.

By adopting these measures, New York City can once again set the national standard for universal representation programs—supporting and strengthening its immigrant communities while ensuring the wellbeing of all its residents. **New York families depend on it.** The solutions outlined here will allow the city to sustainably and humanely respond to immigrants’ legal

¹⁰ The New York City Council, “Res 0714-2025,” database (New York: The New York City Council, updated March 12, 2025), <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=7091618&GUID=0CAC968C-D9D3-48EF-9EFF-236887AA6D69&Options=&Search=>; The New York City Council, “Res 0066-2022,” database (New York: The New York City Council, updated March 10, 2022), <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=5465338&GUID=11F26BAE-B1C4-4B5F-833D-FD8A06DF0152&Options=ID|Text|&Search=%22dignity+not+detention%22>.

services needs in this challenging moment, while building the foundation for long-term, equitable support for immigrants in the years to come.

Thank you for the opportunity to contribute testimony. Please do not hesitate to contact me at kpirnak@vera.org or at (631) 807-5267 if the Vera Institute of Justice can provide further information or support.

Sincerely,

Kelsey Pirnak

Advocacy Manager

Vera Institute of Justice



Violence Intervention Program

P.O. Box 1161 Triborough Station, New York NY 10035 | Tel. 212.410.9080 | Fax 646.975.4554 | www.vipmujeres.org

New York City Council Public Hearing

Committee on Immigration

Alexa Avilés, Chair

**Testimony Submitted by: Margarita Guzmán, Executive Director,
Violence Intervention Program**

Tuesday, October 28, 2025, 10:00 AM

Good morning, Chair Aviles, and thank you for scheduling today's oversight hearing. Your solidarity with immigrant New Yorkers is critical if we are to preserve the unique identity that makes New York the vibrant city it has always been.

My name is Margarita Guzman, and I am the Executive Director of the Violence Intervention Program (VIP). VIP is New York City's only nonprofit led by and for Latine survivors of domestic and sexual violence. For 41 years, we have served primarily Spanish speaking and immigrant survivors with housing and social services programs including emergency domestic violence shelter and intensive case management. In recent years, we have innovated new programming tailored to the unique needs of our communities, including culturally responsive mental health care to address trauma in adults and children, a restorative justice practice for survivors who do not want to go to police, and microgrants and support to survivor-entrepreneurs who want to start or grow their small businesses. Last year, we served over 1650+ survivors and fielded over 5,000 calls to our helpline.

VIP is also a member of The Collective, a culturally specific gender justice organizations providing services to immigrants and communities of color throughout all five boroughs of NYC.

My testimony is focused on the real-life impact of legal services for the population of Latin American immigrant survivors we work with here at VIP.

Gloria came to VIP in March of this year. She was quickly screened and provided a referral for legal services to pursue both an asylum claim and an application for a U Visa. The wait list to meet with an attorney was long. While waiting for legal counsel, Gloria missed a hearing at Immigration Court on June 26th. On July 10, 2025, she received a removal order and called her VIP counselor in distress, sharing her fear and safety planning around both the violence she was trying to escape and the added threat of deportation. On July 18th, she spoke again with her counselor, who offered compassion and care, but could do very little else in the face of limited legal resources. Within days, Gloria stopped answering her phone. We kept trying her, but the number was eventually disconnected. We have not heard from her since and have no way of knowing whether she or her family are safe.

Another survivor, Katerina, was working with VIP for over a year. Several months ago, she secured legal services after VIP referred her for representation on a VAWA petition. On September 19th, she was detained by ICE, but she had a lawyer she could call. We knew that she had been transferred from a detention center in Elizabeth, NY, to one in Louisiana. Her attorney was in contact with her and was able to both advise her and listen to Katerina's priorities. We

learned that Katerina's mental health was deteriorating quickly and that she no longer wanted to remain in the US. Working with her attorney, she chose to return to Chile and pursue her VAWA claim from out of the country instead of within a detention cell. This isn't the outcome that anybody wanted, but at no point was Katerina lost to the system. We knew how to locate her and her attorneys were able to communicate with her. In the end, she had some role in the decision about what happened to her and still has hopes that she will return with status through her VAWA claim.

There are hundreds more survivors who currently have status, work permits, green cards and naturalized citizenship because VIP was able to refer them to legal services.

We can never guarantee the outcomes of those services. Nobody can ever say with certainty that someone will be able to avoid deportation or that they will be approved and obtain status. But the remarkable difference between having an attorney, or reliable legal advice or even just accurate legal information can be the difference between having a path to remain here in their new communities or being disappeared without a trace – likely deported back to countries where they fled political or other gender based violence.

City Council's investment will shift the tide for immigrant survivors. Thank you for standing with immigrants and for using your power to protect and uplift all survivors in NYC.



Good morning, Chair Avilés and Council Members.

My name is Yasmeen Hamza, CEO of Womankind. Thank you for the opportunity to speak today and to encourage the Council to continue investing in immigration legal services for survivors of gender-based violence, especially now, when the need is greater than ever.

Womankind works with survivors of gender-based violence to rise above trauma and build a path to healing. Founded in 1982 to address the lack of services for Asian immigrant women experiencing abuse, Womankind today provides culturally matched direct services to **more than 2,600** survivors of domestic violence, sexual violence, and human trafficking annually in **18 distinct Asian languages**. Every year, we field nearly **3,000 helpline calls** through our 24-hour multilingual helpline, and provide survivors with crisis intervention support, shelter, economic empowerment services, children's programming, and immigration legal service. As one of a small number of culturally specific direct service providers in New York City, we are grateful for the committee's partnership.

Womankind is also a member of The Collective, a coalition of nonprofit service organizations which provide a range of Gender Based Violence services to communities of color and immigrant communities throughout the five boroughs of NYC.

Survivors in our communities are facing unprecedented barriers due to the current federal administration's policies and practices. We are seeing significant delays in the processing of work authorizations, increased requests for evidence that ask for additional information about survivors trauma, and prolonged timelines for all forms of immigration relief. These delays are not just bureaucratic, they are life-altering. They prevent survivors from accessing employment, housing, and safety. They create barriers for them to leave harmful relationships and systems of control.

Immigration status is often weaponized to isolate and manipulate survivors. At Womankind, we launched our legal services program, over 14 years ago, precisely to dismantle this form of control. We support survivors in accessing VAWA self-petitions, Battered Spouse Waivers, U and T Visas, and adjustment of status – legal remedies that allow survivors to reclaim autonomy and begin their healing journey.

The chilling effect of current enforcement policies and anti-immigrant rhetoric has made it harder for survivors to access even the most basic resources, and they are increasingly afraid to seek help. This fear is compounded by the trauma they face, not only in their homes but also from systemic violence. For immigrant survivors, home is often not a safe place, and the systems meant to protect them are failing.

In addition to administrative delays, the increased presence of Immigration and Customs Enforcement (ICE) in our communities has created a climate of fear and retraumatization for survivors of gender-based violence. We are witnessing violent tactics, such as aggressive raids,

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surveillance near courthouses, and indiscriminate detentions, that disproportionately impact immigrant communities already grappling with trauma. For survivors, many of whom are navigating the aftermath of domestic violence, violence, or trafficking, these tactics compound their fear and isolation. The threat of detention or deportation discourages them from seeking help, reporting, or accessing critical services. This systemic violence not only undermines their safety but also erodes trust in institutions meant to protect them. Survivors deserve to heal in environments free from intimidation and harm, not to be retraumatized by the very systems that should offer refuge.

Womankind's legal services program was built from the ground up to meet the unique needs of our community. We come from the communities we serve. We understand the cultural nuances that shape survivors' experiences, and we continuously adapt our programming to meet those needs. We have earned the trust of our community, and that trust is the foundation of effective service delivery.

Despite our proven track record, Womankind was not renewed for federal funding this year. This loss is devastating, not just for our organization, but for the survivors who rely on us for legal support. We are now at a critical juncture. Without sustained investment from local government, we risk losing a vital lifeline for some of our city's most vulnerable residents.

We urge the Council to prioritize funding for immigration legal services for survivors of gender-based violence and invest in organizations like Womankind that are deeply rooted in community, that center survivor voices, and that fight every day for justice and healing. Your support can help ensure that survivors have the tools, the resources, and the legal protections they need to rebuild their lives.

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From: [Chia-Chia Wang](#)
To: [Testimony](#)
Subject: [EXTERNAL] October 28 immigration hearing
Date: Thursday, October 30, 2025 10:08:08 AM

October 28, 2025
New York City Council Immigration Hearing

Honorable Chair and Committee Members,

My name is Chia-Chia Wang, and I am the New York Site Director for Church World Service (CWS). I am also a proud resident of Queens for the past 24 years.

CWS is a global humanitarian organization dedicated to transforming communities around the world through just and sustainable responses to hunger, poverty, displacement, and disaster. Since 1946, our work has reflected our vision of a world where everyone has food, a voice, and a safe place to call home.

Church World Service New York was formally established in 2023 to meet the growing needs arising from human migration and family reunification. In our first full year, we have served over 1,200 unaccompanied children, Ukrainian and Afghan refugees, and Haitian families through legal services and case management.

We are thrilled that the City Council has approved significantly increased funding to support the legal needs of immigrants and migrants and to strengthen their ability to remain in New York City. The City cannot thrive without our migrant brothers and sisters. The recent attacks on migrant children and families have demonstrated how critical non-federal legal service funding is—both to defend immigrant rights and to keep families united.

As one of my colleagues who works with unaccompanied children said so well:
“Our service is not limited to identifying which remedies they are eligible for; it also includes managing each case appropriately and supporting every opportunity they need to grow up safely and with dignity.”

It is important to broaden the scope of this funding to include all legal-related services, such as interpretation and Know-Your-Rights education. It is also essential to ensure an open grant-making process so that as many legal service providers as possible can apply. This will help us reach all communities across New York City and nurture new service providers.

Chia-Chia Wang
Church World Service, New York Site Director
Tel: [REDACTED]



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Queens: 89-14 Parsons Boulevard, 2nd Floor ♦ Jamaica, NY 11432 ♦ Fax: 718.291.4360

Center for Family Representation (CFR)
Testimony to the Immigration Committee of the New York City Council

Hearing Date: October 28th, 2025

Center for Family Representation (CFR) is grateful for the opportunity to submit testimony to the New York City Council on the needs of Immigration Legal Service Providers in NYC. We thank you for providing this opportunity and for your support of CFR.

Overview of CFR

CFR is the county-wide, assigned indigent defense provider offering interdisciplinary legal representation to parents being investigated or prosecuted by ACS in Manhattan, Queens, and Staten Island. In the Bronx, we are an assigned conflict provider. We have represented more than 2,300 clients in the last FY. Over 90% of our clients are Black, brown, or people of color. We also provide representation to youth prosecuted in Manhattan, Queens, and Bronx Family Court.

CFR employs an interdisciplinary model of parent defense, assigning each client an attorney and a social work team member. These teams are additionally supported by Parent Advocates, parents who have been investigated and prosecuted by ACS and who can support clients from a place of empathy and understanding. Our interdisciplinary model ensures that the New York City families we represent are receiving comprehensive support inside and outside of their legal proceedings.

CFR's Immigration Legal Services

Over 30% of CFR's clients are immigrants. When the Family Defense, Early Defense, or Youth Defense Practice connect a non-citizen client to CFR's immigration team, the immigration team will represent that individual and their family in their removal proceedings as well as in any affirmative applications before USCIS. Due to the current federal government's aggressive and increasingly inhumane approach to immigration related law enforcement, risk of family separations through detention and deportation has increased exponentially. Our clients have found themselves subject to incredibly stressful and confusing situations exacerbated by the current climate of fear. Accordingly, CFR has pushed for increased funding for our immigration legal services to respond to the increase in need for our services.

As testified to by the other providers, CFR's immigration team members have had to expand the scope and volume of our work to meet the growing needs of our immigrant clients. Because ICE has ramped up its detention of immigrants who attend routine immigration court appearances and ICE check-ins, our team of four attorneys has been stretched thin accompanying clients to those appointments. Recently, clients who have already been granted fear-based relief such as withholding of removal have begun receiving call-in letters to go to DHS offices – here, too, we have stretched our organizational resources to attend these appointments with our clients. Although CFR's immigration team is not funded as a universal representation model, we know that our clients and their families are best served when we take most cases that are referred to us, because we understand that 1) the risk of detention for a non-citizen who is pro se is extraordinarily high and 2) we recognize that other providers are equally at capacity.

Our mission is to keep families together; accordingly we have begun representing parents of

unaccompanied non-citizen minors in ORR custody, for whom the hurdles to reunification have become all but impossible to clear. Like our sister organizations have attested to, the current federal government is inclined to move detained non-citizens to detention centers outside of the New York area as a more convenient staging ground for deportation. Like other immigration legal service providers, we have continued to represent clients who get transferred to other states, a further drain on resources. Similarly, because the federal government now believes that most non-citizens who are undocumented are subject to mandatory detention, with no recourse in immigration court, our attorneys have had to file habeas petitions in federal court to obtain relief – a significant expansion of our work that has required additional time, training and resources. We have had to provide more advisals to criminal and family defense attorneys because broader categories of acts now subject non-citizens to mandatory detention, under new statutes – including the Laken Riley Act.

CFR's immigration team has also dedicated itself to increasing the number of community and in-house training that we provide, to ensure that community members and advocates who are not immigration-savvy understand all of the harsh realities of this moment. For the first time ever, the federal government has imposed fees on asylum applications. It has raised fees for other immigration applications. In the last month and a half, CFR has spent just under \$4,000 covering fees for our immigration clients – and this number is expected to balloon further. We know the City Council shares our belief that a families' incomes should not impact whether families can receive immigration relief and remain together.

Conclusion

CFR's mission to defend NYC's families from unjust separation continues to grow more difficult, but we are committed to ensuring that all of our clients are given the opportunity to thrive. Our immigration practice has become an essential part of this work, and due to the increasingly violent actions of the federal government, we know that our immigrant clients are likely to face many challenges in the coming days. We rely heavily on the city council to make our work possible, and we thank you for your continued support. If you have any questions, please do not hesitate to reach out to CFR's Attorney-in-Charge of Immigration, Zoe Schonfeld, at zschonfeld@cfny.org

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Christopher leon johnson



To the chair of the immigration committee. October 28, 2025.

Hello my name is Christopher Leon Johnson. Today I was at the immigration committee hearing. To testify on behalf of legal services for immigration-based organizations and nonprofits. I submitted a request to have the city Council information technology team to upload the full video of the hearing today on October 28 down 25. Because I was there and I testify in person. Since I am not able to see my own testimony I will have to submit a written statement to be on the safe side. I am cool on the city Council. I am calling on the city Council to pass intro 330 to 133221332 space 1332 intro 1332 to stop the unfair deactivation of the liver Eastus delivery duty workers stopped on 30 elevations. I support intro 1332 to stop unfair deactivation of delivery workers. I am going on the city Council. I am calling on the council two passed a street vendor reform package in the city Council. I want those two bills for the street vendors and the delivery workers to be passed this year. The speaker of the council should not be in the way of this. I understand that the speaker is back by DoorDash and many of the other council members are back by DoorDash and DoorDash is against his bill but it should be passed anyway I am calling on the stopping of criminalization of the delivery service workers/delivery workers. I am calling on stopping of the criminalization of street vendors. I am opposed to 15mph rule for a bike riders. As I said my hearing today that delivery workers needs legal help. Sri Benderson. I am calling on the city Council to designate millions dollars into both the worker justice project and the street vendor project so they are able to hire both in-house legal advisors in case workIn case workers. Thank you and enjoy your day

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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☐ in favor ☐ in opposition

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Name: Manuel Castro

Address: _____

I represent: MOJA

Address: _____

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Date: 10/28/75

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Name: Commissioner Manuel Castro

Address: _____

I represent: MOJA

Address: _____

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Date: 10/28/75

(PLEASE PRINT)

Name: Loren Wren, DC of Programs and Policy

Address: _____

I represent: MOJA

Address: _____

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Date: 10/28/25

(PLEASE PRINT)

Name: Enrique Chavira Carter

Address: Director of Policy and Program Initiatives

I represent: MOJA

Address: _____

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Appearance Card

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(PLEASE PRINT)

Name: Shawn Blumberg

Address: Brooklyn Defender Services 177 Livingston St 7th Fl
Brooklyn 11201

I represent: Brooklyn Defender Services

Address: 177 Livingston St 7th Fl, Brooklyn NY 11201

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Date: 10/28/25

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Name: Brundon Lloyd

Address: 250 E 42nd Street, NY

I represent: Urban Resource Institute

Address: 250 E 42nd Street, NY

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(PLEASE PRINT)

Name: Pooja Asnani, Sanctuary for Families

Address: 30 Wall Street

I represent: Sanctuary for Families

Address: 30 Wall Street, 8th Floor, NY

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Date: 10/28/2025

(PLEASE PRINT)

Name: LISA ZHENG (with AAF)

Address: _____

I represent: Homecrest Community Services

Address: _____

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THE CITY OF NEW YORK**

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☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Yessenia Mata

Address: 774 Port Richmond Ave

I represent: La Colmena

Address: _____

◆ Please complete this card and return to the Sergeant-at-Arms ◆

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THE CITY OF NEW YORK**

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Date: _____

(PLEASE PRINT)

Name: Candice Povaen

Address: _____

I represent: Rox NY C

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Rosa Cohen-Cruz

Address: _____

I represent: The Bronx Defenders

Address: 361 C- 161st St, BRONX NY

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THE CITY OF NEW YORK**

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Date: _____

(PLEASE PRINT)

Name: Airenakhve B. Dmoragbor

Address: _____

I represent: African Communities Together

Address: _____

Please complete this card and return to the Sergeant-at-Arms

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THE COUNCIL THE CITY OF NEW YORK

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☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Roberto Jean-Francois

Address: 115 57th Ave

I represent: CWS Global

Address: _____

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Appearance Card

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☐ in favor ☐ in opposition

Date: 10/28/25

(PLEASE PRINT)

Name: Devashish Basnet

Address: _____

I represent: The New York Immigration Coalition

Address: _____

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

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☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Jorge Paz Reyes

Address: _____

I represent: Unlocal Inc.

Address: _____

Please complete this card and return to the Sergeant-at-Arms

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☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Ligia Guallpa

Address: Workers Justice Project

I represent: Los Deliberista Unidos

Address: _____

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Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: William Medina

Address: Workers Justice Project

I represent: Los Deliberista Unidos

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Amador Ly

Address: [REDACTED] NY NY

I represent: myself

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: PAULA INHARGUE

Address: _____

I represent: UNITED NEIGHBORHOOD HOUSES

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Carolyn Cowen

Address: 45 Suffolk Street

I represent: Chinese - American Planning Council
(CPC)

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1014 Res. No. _____

☒ in favor ☐ in opposition

Date: 10/28/25

(PLEASE PRINT)

Name: ROGER MALY

Address: _____

I represent: ROCC NYC

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1014 Res. No. _____

☒ in favor ☐ in opposition

Date: 10/28/25

(PLEASE PRINT)

Name: ADANA BAIH

Address: _____

I represent: AFRIKANA

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Sierra Kraft

Address: _____

I represent: ICARE Coalition

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 10/28/2025

(PLEASE PRINT)

Name: Celina Munoz

Address: 121 Avenue of the Americas, New York, NY 10013

I represent: The Door Legal Services Center

Address: _____

Please complete this card and return to the Sergeant-at-Arms

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 10/28/2025

(PLEASE PRINT)

Name: Lauren Migliaccio

Address: 17 Battery Place #331 NY NY 10004

I represent: Immigrant Justice Corps

Address: 17 Battery Place #331 NY NY 10004

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: ALEJANDRA ARAGON

Address: 245 23rd St. Brooklyn, NY 11215

I represent: Mixteca Organization

Address: 245 23rd St. Brooklyn, NY 11215

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: RALUCA ONCIOIL

Address: [REDACTED] BKLYN 11201

I represent: CATHOLIC MIGRATION SERVICES

Address: 191 JORALETTON ST.

Brooklyn 11201

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Riya Ortiz

Address: _____

I represent: Lisa Zhen

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Lisa Zhen

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Navdeep Bains

Address: _____

I represent: _____

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: 10/28/25

(PLEASE PRINT)

Name: Christina Johnson

Address: [REDACTED]

I represent: Self

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: NILBIA COYOTE

Address: _____

I represent: NICE

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: NADYA LUCERO

Address: _____

I represent: NICE

Address: NICE

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Hildalyn Colon

Address: _____

I represent: NICE

Address: 7219 Roosevelt Ave 4th FL

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Sierra Ortiz

Address: _____

I represent: NICE Network

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 10/28/2028

(PLEASE PRINT)

Name: Deborah Lee

Address: 49 Thomas Street, NY, NY 10013

I represent: The Legal Aid Society

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: OCT-28, 2025

(PLEASE PRINT)

Name: HAMRA AHMAD
Address: 100 BROADWAY, 10th FL, NY, NY 10005
I represent: HER JUSTICE ↑
Address: [REDACTED] MT-KISCO, NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 10/28/2025

(PLEASE PRINT)

Name: Marilia G. Richards
Address: 252 W. 37th St, Suite 1500
I represent: Kids In Need of Defense (KIND)
Address: 252 W. 37th St, Suite 1500

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Desiree Hernandez Sanchez
Address: [REDACTED] Astoria NY
I represent: Catholic Charities Community Services
Address: 80 Maiden Lane, 24th floor, NY, NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Christine Clark

Address: _____

I represent: Legal Services NYC

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Hanra Ahmad

Address: _____

I represent: Her Justice

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1014 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Chizelia Wang

Address: 475 Riverside Drive #700

I represent: Church World Service NY

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Airenakhue B. Omoragbon

Address: (eye-uh-knock-way)

I represent: African Communities Together

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Carlyn Cowen

Address: _____

I represent: Chinese American Planning Council (CPC)

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Yasmeen Hamza (The Collective)

Address: _____

I represent: WomanKind

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Joehe Fischer (The Collective)

Address: _____

I represent: Korean American Family Service Center (KAFSC)

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Margarita Guzman (The Collective)

Address: _____

I represent: Violence Intervention Program (VIP)

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Christine Clarke

Address: _____

I represent: Legal Services NYC

Address: 40 West St. NY NY

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Mohammad Razvi

Address: [REDACTED] Island Ave

I represent: Council of People Organization

Address: 1081 Corey Island Ave.

▶ Please complete this card and return to the Sergeant-at-Arms ◀

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Jane Shim

Address: _____

I represent: _____

Address: _____

▶ Please complete this card and return to the Sergeant-at-Arms ◀