



Thomas D. Homan, Director  
Claire Trickler-McNulty  
U.S. Immigration and Customs Enforcement  
500 12th Street, SW  
Washington, D.C. 20536

May 31, 2017

**Re: Arbitrary, prolonged, and indiscriminate detention of asylum seekers**

Dear Director Homan and Ms. Trickler-McNulty,

In recent months, Community Initiatives for Visiting Immigrants in Confinement (CIVIC) has witnessed a sharp rise in the use of arbitrary and capricious denials of bond and parole for vulnerable asylum seekers in detention. This confirms a larger trend that advocates and attorneys have been witnessing across the country toward closing the traditional space for parole and refusing to issue bonds, even after asylum seekers have passed their credible fear interviews.

We, the undersigned 207 organizations and individuals, have documented 805 cases at 37 immigration detention facilities of individuals who have been arbitrarily denied parole or bond since January 20, 2017. Arbitrary detention of asylum seekers is a plain violation of the letter and spirit of international law concerning the rights of refugees; it must be ended now.

Regrettably, the use of prolonged detention to deter asylum seekers has been a feature of both the Obama and Trump administrations; however, there has been an increase in the practice of unaccountable parole and bond denials since the signing of the Jan. 25 Executive Order, "Border Security and Immigration Enforcement Improvements" and the subsequent Implementation Memo by the Department of Homeland Security (DHS), released Feb. 20, 2017. Although the Memo claimed that asylum seekers would remain eligible for parole, our experience has confirmed that there has been an increase in parole and bond denials as part of the Trump administration's enforcement strategy. Both documents have had a chilling effect on the use of parole, including by narrowly delineating the circumstances under which it may be considered, demanding an end to so-called "catch and release," and proposing increasingly exotic and inhumane schemes for long-term detention, including push-backs to Mexico of third-country nationals awaiting removal proceedings.

Moreover, the experience of advocates and attorneys working at the border suggests that ICE officers are denying parole and bond on a regular basis even under the limited conditions outlined by ICE and national leadership. A February 2017 report by the Borderland Immigration Council notes that "ICE routinely elects to deny parole for even the most urgent, humanitarian and exceedingly reasonable requests." Human Rights First reports that "ICE officers have in many cases failed to follow the official ICE parole directive, applied the parole criteria inconsistently, or failed to release asylum seekers [...] even when they present evidence that they satisfy the parole criteria." Both organizations

spoke to individuals who had been denied parole even though this resulted in family separation, including severing parents from young children for long periods.

We, the undersigned individuals and organizations, have encountered similar instances working with detained asylum seekers across the country. ICE Field Offices have verbally told attorneys that their clients, who have passed their credible fear interviews, have been denied parole because they could not show urgent humanitarian reasons or a significant public benefit that would be derived from parole. In at least one case, attorneys and advocates learned that deportation officers brought large groups of Haitians together, who had been previously granted ICE bonds, and announced to them as a group that their ICE bonds were being revoked. No individualized reasons were given for this blanket revocation.

We demand an immediate end to the arbitrary, prolonged, and indiscriminate detention of asylum seekers. Denying parole or bond to families and individuals who are simply exercising their right to seek protection under international law and who in many cases have urgent humanitarian needs, including the right to family unity, is a gross injustice. The practice tears apart families and communities, and it has devastating impacts on an already traumatized population. Current trends toward restricting parole and bond must be immediately reversed if the United States is to live up to its moral and legal obligations to those most at risk.

Sincerely,



Christina M. Fialho  
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*On behalf of 115 organizations, 23 legal representatives, and 69 faith leaders and other advocates:*

Acting in Community Together in Organizing Northern Nevada (ACTIONN)  
Adjunct Justice  
Alianza  
American Gateways  
Americans for Immigrant Justice  
Asian Americans Advancing Justice - Asian Law Caucus  
Asian Law Alliance  
ASISTA  
Asylee Women Enterprise  
Baker Interfaith Friends  
Better Together NYC

Brooklyn Defender Services  
UC Hastings Center for Gender and Refugee Studies  
Chicago Religious Leadership Network on Latin America - CRLN  
Church of Our Saviour/La Iglesia de Nuestro Salvador  
Cleveland Jobs with Justice  
Coalition for Humane Immigrant Rights (CHIRLA)  
Colorado Immigrant Rights Coalition  
Committee in Solidarity with the People of El Salvador  
Community Initiatives for Visiting Immigrants in Confinement (CIVIC)  
Cornell Asylum/CAT Appeals Clinic  
Cornell Law School Asylum and Convention Against Torture Appellate Clinic  
Des Moines Faith Committee for Peace  
Detention Watch Network  
Dolores Street Community Services  
Dominican Sisters ~ Grand Rapids  
End Domestic Abuse WI  
Faithful Friends-Amigos Fieles  
Feldman Feldman & Associates, PC  
First Congregational UCC - Portland  
First Friends of New Jersey and New York  
Franciscans for Justice  
Friends of Broward Detainees  
Friends of Miami-Dade Detainees  
Fuerza Mundial  
Gethsemane Lutheran Church  
Grassroots Leadership  
Greater Rochester Coalition for Immigration Justice  
Hispanic Interest Coalition of Alabama  
Holy Spirit Missionary Sisters - USA - JPIC  
Human Right Initiative of North Texas  
Illinois Coalition for Immigrant and Refugee Rights  
Immigrant Allies of Marshalltown  
Immigrant Defenders Law Center  
Immigration Center Of San Bernardino  
Immigration Equality  
Inland Coalition for Immigrant Justice  
Inland Empire Immigrant Youth Collective (IEIYC)  
Inter-Faith Coalition On Immigration, MN  
Inter-Faith Committee on Latin America (IFCLA)  
International Rescue Committee  
InterReligious Task Force on Central America and Colombia (IRTF)  
Iowa Unitarian Universalist Witness/Advocacy Network  
JPIC Committee of the Sisters of St. Francis of Philadelphia  
Just Foreign Policy  
Justice for Our Neighbors Southeastern Michigan  
Justice Strategies

Kids for College  
Kino Border Initiative  
Kitsap Immigrant Assistance Center  
Korean Resource Center  
KWESI  
Lafayette Urban Ministry Immigration Clinic  
Las Cruces CIVIC Visitation Program  
Latin American Legal Defense and Education Fund  
Law Office of Cheri Attix  
Law Office of Emily Wietzel  
Law Office of Fabiola A Navarro  
Law Office of Nadia Galash  
Law Office of Paula Joachin  
Law Office of Serena Salinas  
Law Offices of Ed Perez, Esq.  
Law Offices of John J Kang  
Legal Services for Children  
Litigare Trial Consulting  
Los Angeles Center for Law and Justice  
Massachusetts Immigrant and Refugee Advocacy Coalition  
Medford First Church of the Nazarene  
Migrant and Immigrant Community Action Project  
Migrant Rights Collective  
National Center for Transgender Equality  
National Immigrant Justice Center  
National Immigration Law Center  
NETWORK Lobby for Catholic Social Justice  
NH Conference UCC Immigration Working Group  
Northern Illinois Justice for Our Neighbors  
Northern Valley Catholic Social Service  
Orange County Communities Organized for Responsible Development (OCCORD)  
OutFront Minnesota  
Pangea Legal Services  
Pennsylvania Immigration and Citizenship Coalition  
Peoples Action Institute  
Ponce Law Firm, P.C.  
Pueblo Sin Fronteras  
Queer Detainee Empowerment Project (QDEP)  
Redwood Justice Fund  
Reformed Church of Highland Park  
Refugio del Rio Grande  
Rural and Migrant Ministry  
Santa Fe Dreamers Project  
Sauti Yetu Center for African Women and Families  
Sisters of Charity of New York  
Social Justice Council, Mt. Diablo Unitarian Universalist Church

Southeast Asia Resource Action Center (SEARAC)  
Southern Poverty Law Center, Southeast Immigrant Freedom Initiative  
The Florence Immigrant and Refugee Rights Project  
The Garden, A Lutheran Ministry  
UC Davis Immigration Law Clinic  
Unitarian Universalist Association  
Unitarian Universalist Legislative Ministry of New Jersey  
Unitarian Universalist Service Committee  
Unitarian Universalists for Social Justice (UUSJ)  
VietLead  
Wayne Action for Racial Equality  
Wilco Justice Alliance (Williamson County, TX)

Attorney and DOJ Representatives:

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Denise Gilman  
Edith Coates  
Eldaah Arango  
Elissa Steglich  
Fred Korkosz  
Gabriel Urias  
Hannah Cartwright  
Helen Ramirez  
Juliana Zhu  
Julius Jaboro  
Lisa Kasdan  
Nerea Woods  
Paula Gonzalez  
Reza Athari  
Sally Steinberg  
Siana Mclean  
Tamara Shehadeh-Cope  
Galya Ben-Arieh Ruffer  
Lindsay M. Harris  
Beverly Huff  
Fikile Ryder

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Alison Rice  
Andrés Pacheco  
Angela Shannon  
Anne Nash

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Barbara Pampalone  
Barbara Woshinsky  
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Joel Parra  
Judith Goldberger  
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Karen Skold  
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Laura Simocko  
Lena Robison  
Leslie Zondervan-Droz  
Linda Quintana  
Linda Theophilus  
Lizette Ceja  
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Nancy Farrell  
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Nancy S. Young  
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Suzanne Llewellyn  
Talia Mills  
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Yvonne Marlier

CC:

Nicole Boehner, United Nations High Commissioner for Refugees

Claire McCaskill, U.S. Senate Homeland Security & Governmental Affairs

Zoe Lofgren, U.S. House Judiciary Committee, Subcommittee on Immigration & Border Security