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Violations at the Border

The El Paso Sector

February 2017



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ACKNOWLEDGEMENTS

The principle author and researcher of this report was B. Shaw Drake, Equal Justice Works Fellow at Human Rights First. Eleanor Acer, Senior Director for Refugee Protection, contributed additional drafting and editing, and oversees Mr. Drake's fellowship. Daphne Eviatar, Senior Counsel and Meredith Kucherov, Writer/Editor, edited the report and Sarah Graham, Art Director, designed the report. We are particularly thankful to Theodora Simon, Associate Director for Advocacy & Leadership Development, of the Hope Border Institute in El Paso, Texas, for her coordination. We are grateful for the invaluable support of Equal Justice Works and fellowship sponsors Morgan Stanley and Simpson Thacher & Bartlett LLP. Human Rights First also thanks the Oak Foundation, the Libra Foundation, the Heising-Simons Foundation and the Simmons Sisters Fund of The Dallas Foundation for their support of the organization's research and advocacy on access to asylum.

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Introduction

On January 25, 2017, President Trump signed the “Border Security and Immigration Enforcement Improvements” executive order. On February 20, Homeland Security Secretary John Kelly issued a memorandum implementing it. Although the executive order’s stated aim is to establish “control of the border,” one of its primary—and likely intended—consequences will be to restrict lawful access to asylum through policies that block access to protection at the border, increase the criminal prosecution of asylum seekers, and subject those who pursue asylum requests to arbitrary and lengthy detentions.¹ These policies violate U.S. law and treaty commitments relating to refugee protection.

But even before Trump’s executive order, Customs and Border Protection (CBP) and Immigration and Customs Enforcement (ICE) have ignored the protections that Congress created for asylum seekers in a number of cases, disregarding official ICE guidance on detention of asylum seekers, and violating U.S. human rights and refugee obligations. These abuses occurred in a number of locations, including in the El Paso region, where a Human Rights First researcher visited earlier this month.

Some examples of violations include asylum seekers arriving at U.S. ports of entry being turned away, some being criminally prosecuted, and many asylum seekers landing in lengthy detentions due to automatic parole denials. Through the executive order and its implementing memorandum,² the Trump Administration is essentially converting these rights-violating practices into official U.S. policy.

The El Paso sector, one of nine Border Patrol sectors that run along the southwest border of the United States with Mexico, is one of the largest and most populated, encompassing 125,500

square miles including the entire state of New Mexico and part of west Texas.³ In fiscal year 2016 the El Paso sector saw a 364 percent increase in the number of families seeking to enter the United States, and a 134 percent increase in the number of unaccompanied children.⁴

Although the Rio Grande Valley, Tucson, and San Diego sectors receive more individuals seeking to enter the country⁵, the El Paso sector is home to three immigration detention facilities, a temporary processing center to house recent arrivals, and a network of local nonprofit organizations that provide legal representation to asylum seekers.⁶

The dangers asylum seekers turned back at the border face, the prosecution of asylum seekers for the crime of “illegal reentry,” and the near moratorium on parole make El Paso a microcosm of the border region, and an illustrative example of the likely impact the government’s new policies will have on asylum seekers.

The Trump Administration should rescind this executive order and abandon policies that are inconsistent with and aimed at circumventing U.S. law and treaty commitments. Instead, the United States should address the protection requests at the U.S. border as part of a regional refugee and displacement crisis. The United States has the capacity to both safeguard its borders and adhere to its treaty commitments. As they continue to take steps to implement this flawed order, the Departments of Homeland Security and Department of Justice must uphold U.S. human rights and refugee protection obligations.

Vulnerable Asylum Seekers Turned Back to Danger

According to a January 2017 complaint filed with the Office of Civil Rights and Civil Liberties and the DHS Inspector General, Customs and Border Protection agents have been turning back some

asylum seekers at official ports of entry across the U.S.-Mexico border since July 2016. This includes cases of asylum seekers turned back from the El Paso port of entry into Ciudad Juarez, Mexico as well as asylum seekers turned back from the San Ysidro port of entry, initially due to lack of processing space during ongoing construction.

Cases documented between July 2016 and January 2017 demonstrate turn-backs occurred at several locations across the border in the first three months of FY 2017.⁷

In the first quarter of FY 2017, El Paso experienced a surge in the number of unaccompanied minors and families arriving at the border. Similar to trends in other sectors, the number of families increased 261 percent and the number of unaccompanied minors increased 92 percent when compared to the same period the prior year.⁸ The U.N. Refugee Agency (UNHCR), has recognized these populations—unaccompanied minors and women with children from the Northern Triangle of Central America—as part of a regional refugee crisis.⁹

Also in the first quarter of FY 2017, local advocates and immigration lawyers reported an increase in the number of asylum seekers turned away by CBP agents when they requested asylum at the official port of entry along the border. For example, one attorney reported that in mid-February 2017 a CBP agent at the El Paso port of entry told a Mexican journalist who was seeking asylum that Mexicans cannot claim asylum. The applicant's attorney successfully corrected the officer and his client was processed.¹⁰ However, such reports raise concerns that others may be turned back when seeking asylum without legal assistance.

U.S. law has established processes for individuals to request asylum both within the United States and at formal ports of entry. Under U.S. law, asylum seekers who request protection at the

U.S. border but are inadmissible are not to be immediately returned. Instead, they should be referred for an interview with an asylum officer, and if they pass that screening they can file an application for asylum before the immigration courts.

Asylum seekers who were summarily rejected at the border were left at risk of being deported back to persecution in their home countries, in contravention of U.S. law and treaty commitments; for those who were Mexican, the violation of non-refoulement (the obligation to not return people to possible persecution) was immediate. In addition, asylum seekers rejected at the El Paso port of entry were turned back to Ciudad Juarez, which was once deemed the most dangerous city in the world and where violence is again on the rise.¹¹

These misguided practices at the border penalize asylum seekers who seek protection at an official port of entry, and ironically, push some to attempt to cross the border illegally after U.S. agents wrongly deny them access to the U.S. asylum system.

Some examples of this practice in the El Paso sector include:

- In November 2016, a Guatemalan woman and her fourteen-year-old daughter attempted to seek asylum at the El Paso port of entry after receiving death threats in Guatemala. After crossing the El Paso Bridge, two CBP agents reportedly told her to turn around and refused to process the family, despite her request for assistance and presentation of documents about her asylum claim.

The mother reported that one officer pushed her and pointed a gun at her before she turned around and left the bridge. She feared leaving the port “because of the threats [she] faced in Guatemala and because of the danger of [her] daughter being kidnapped and

raped in Mexico.” The family crossed the Rio Grande River three days later, were detained by Border Parole agents and received a positive fear determination following interviews with the Asylum Office.¹²

- In October 2016, a young Guatemalan mother and her two-year-old son were turned back in Anapra, New Mexico. The mother reported a CBP officer grabbed her by the shoulder, turned her around to face Mexico and told her to leave, stating “we don’t want Guatemalans here.”¹³

The January 25th executive order and subsequent DHS memorandum, citing INA section 235(b)(2)(C), direct ICE and CBP “to the extent appropriate and reasonably practicable” to return some arriving individuals to contiguous territories (Mexico and Canada) while they await removal proceedings, which will apparently be conducted by video teleconference.¹⁴ The DHS memorandum states that such action would be undertaken “to the extent otherwise consistent with the law and U.S. international treaty obligations.”

Neither the order nor the memorandum explain how such a scheme would be consistent with U.S. law and treaty commitments relating to refugee protection and asylum.

Last week Mexico’s interior secretary, Miguel Angel Osorio Chong, told both Secretary of State Rex Tillerson and Homeland Security Secretary John Kelly during their visit to Mexico City that Mexico would not accept non-Mexican nationals turned away by the United States. “We told them it is impossible,” reported Secretary Osorio Chong. “There is no way, legally, nor is there capacity.”¹⁵

The Refugee Convention and Protocol bar the United States from returning refugees to persecution “in any manner whatsoever.” U.S. immigration and refugee law has established processes for arriving asylum seekers to request

protection and for the adjudication of their claims.¹⁶ If the proposed scheme were applied to asylum seekers, the United States would adopt a policy of turning asylum seekers away to face danger, persecution, torture and potential trafficking in Mexico, and would put non-Mexican asylum seekers at grave risk of onward refoulement to their countries of persecution.

Such a system, applied to Mexican and/or non-Mexican asylum seekers would directly violate U.S. domestic law and treaty obligations. It would also place already vulnerable refugees in grave peril, further erode U.S. global leadership as a nation that protects the vulnerable, and encourage other countries to likewise shirk their responsibilities under international law and treaties.

Expanding Criminal Prosecutions Undermines Protection

President Trump’s January 25th order and DHS’s implementation memorandum encourage an increase in prosecutions for illegal entry, re-entry, and other entry-related offences, without any mechanism to exempt asylum seekers from prosecutions. The criminal prosecution of asylum seekers on account of their illegal entry or presence violates U.S. treaty commitments.¹⁷

Under Article 31 of the Refugee Convention, the United States is barred from penalizing refugees “on account of their illegal entry or presence,” a provision that certainly includes criminal prosecutions for illegal entry and other entry-related offenses.¹⁸

In May 2015, the DHS Office of Inspector General found that the CBP was referring asylum seekers for criminal prosecutions for illegal reentry after they expressed a fear of return to their home country, noting that such referrals may violate the Refugee Convention and Protocol.¹⁹ Further

expansion of such prosecutions and the lack of clear guidance to safeguard asylum seekers will result in further violations of individuals' human rights and U.S. legal obligations.

During FY 2016, over 64,000 cases of illegal entry and reentry were prosecuted in U.S. District Courts—over half of all federal criminal prosecutions.²⁰ West Texas and New Mexico federal district courts, both within the El Paso sector, prosecuted the second and third most cases of illegal reentry, behind just the Southern District of Texas.²¹

In December 2016, U.S. Attorney Damon Martinez in southern New Mexico capped the number of nonviolent border crosser cases to 150 per month based on his determination that his office's resources would be better spent fighting violent crime.²²

In the El Paso sector, CBP (at ports of entry) and Border Patrol agents continue to refer asylum seekers for criminal prosecution, and DOJ prosecutors continue to prosecute individuals who clearly express a fear of return to their home country.²³ As a result, asylum seekers are subjected to criminal prosecutions due to their illegal entry, which, as a result, could impact their asylum case.

In July 2016, the Justice Department's Bureau of Prisons closed a privately run 1,200-bed facility in New Mexico, which housed non-violent border crossers who had been subjected to criminal prosecutions, after three questionable deaths of inmates were uncovered and the facilities' medical standards fell short of federal requirements.²⁴ In October 2016, the same facility was reopened to house immigrants detained under ICE's administrative detention authority. Bed space for immigrants who are criminally prosecuted for entry related offences has also been expanded at the Tarrant County Detention Facility outside of Albuquerque, New Mexico²⁵

While some may be afforded belated access to U.S. protection channels after being subjected to criminal prosecutions, these asylum seekers have already been penalized.²⁶ Neither DHS nor DOJ appear to have mechanisms to prevent referral for prosecutions that violate Article 31 of the Refugee Convention.²⁷

Two examples documented in a report issued by Borderland Immigration Council include:

- A Honduran asylum seeker was criminally prosecuted after requesting asylum at the El Paso port of entry. After requesting asylum, along with his mother, the asylum seeker was criminally prosecuted for illegal entry. After he was prosecuted and moved from criminal detention into immigration detention, ICE denied his request for parole, claiming that he was a "flight risk" and that he attempted to "elude inspection." His attorneys report that their client did not elude inspection, noting that he requested asylum at the official port of entry. His mother was paroled into the United States to reside with her U.S. legal permanent resident daughter. The asylum seeker had been held in detention for over one year.²⁸
- In 2016, a Mexican woman was denied entry at the El Paso port of entry after a CBP officer reportedly told her "Mexicans don't get asylum." She was fleeing Mexico after drug cartels raped her. Upon returning to the port of entry to again attempt to seek asylum, she was detained and criminally charged with illegal re-entry.²⁹

Parole Denials Prolong Detention of Asylum Seekers

President Trump's January 25th executive order calls for non-citizens who have not been admitted to the United States to be held in detention facilities for the duration of their immigration and asylum proceedings, and calls for the issuance or

revision of regulations to the extent that they are inconsistent with the guidance.³⁰

DHS's implementation memorandum calls for an end to policies it describes as "catch-and-release," identifies a very limited list of circumstances under which an immigrant or asylum seeker can be considered for release on a case-by-case basis, and states that ICE's parole authority should be used only "sparingly." It lists limited scenarios where release from detention would be appropriate, including where release is required by statute, by a binding settlement agreement or order issued by a competent judicial or administrative authority, or when an arriving alien who has passed the credible fear screening process "affirmatively establishes" certain criteria.³¹

The memorandum specifically confirms that the ICE parole directive relating to asylum seekers who initially arrived at official ports of entry is still in effect.³² It also however indicates that the parole directive remains in effect "pending further review", evaluation, and the issuance of additional ICE guidance.

Requiring an asylum seeker to "affirmatively establish" that he/she meets the requirements for parole signals that DHS may no longer assess each asylum seeker who passes the credible fear screening for release, which would leave the many asylum seekers who do not have the resources to pay for legal counsel stuck in detention for the duration of their proceedings even if they meet the relevant release criteria.³³

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 from detention even when they present evidence that they satisfy the parole criteria. In a series of reports issued in 2016, Human Rights First documented these arbitrary and costly

detention and parole practices that leave many asylum seekers in detention unnecessarily.³⁴

Article 9 of the International Covenant on Civil and Political Rights requires prompt court review of immigration detention and prohibits the use of immigration detention in ways that are arbitrary, including when its use is unnecessary and disproportionate to achieving the government objective.³⁵ The detention of asylum seekers is also limited under the Refugee Convention.³⁶

Government data, accounts of local nonprofit attorneys, and a report by the Borderland Immigration Council all indicate that despite the ICE parole directive and U.S. human rights and refugee protection treaty obligations, ICE in the El Paso sector denies asylum seekers parole even when they meet the ICE parole directive guidelines for release. In September 2016, Human Rights First found the same to be true in Georgia³⁷, and as of November 2016, ICE was rarely granting parole to asylum seekers in New Jersey.³⁸

On any given night, an estimated 4,000 immigrants are held in three ICE detention facilities in the El Paso sector.³⁹ Most recently available data indicates that ICE paroled zero individuals from the Otero County facility and two from the West Texas Detention Facility in Sierra Blanca during a 12-month period.⁴⁰ At the El Paso Service Processing Center, ICE paroled 185 detainees during the same period but transferred over 1,900 to other facilities within the region that granted almost no paroles.⁴¹

Local attorneys report that many of their asylum seeker clients are transferred from the El Paso Service Processing Center to more remote centers such as the facility in Sierra Blanca, where pro bono lawyers cannot afford to travel and where parole is essentially unavailable.⁴²

Additionally, local attorneys report bonds are set extremely high, often between ten and thirty

thousand dollars. These amounts are far too high for indigent asylum seekers to pay, leaving them detained for extended periods of time. Attorneys also report that custody hearings to set bond often turn into mini-asylum hearings, with immigration judges expecting nearly full presentation of the underlying asylum claim before setting or reducing bond amounts.⁴³

The Borderland Immigration Council, a coalition of private and nonprofit attorneys, documented a rise in parole denials and prolonged detention after the arrival of a new ICE Field Office Director in December 2015. The new director had previously served as Deputy Field Office Director in Atlanta, Georgia, during the time data shows zero immigrants were paroled from Georgia detention facilities.⁴⁴ Lawyers in El Paso report that parole requests for their asylum seeker clients that were previously granted as they met the parole criteria are now instead denied despite appearing to meet the official ICE parole criteria.⁴⁵

For example:

- A Mexican asylum seeker was denied release on parole even though he had extensive documentation of his U.S. family ties and identity. In 2015, a Mexican national presented at the El Paso port of entry to seek asylum after his twin brother and a cousin were detained and tortured by members of the Mexican federal police in 2013. After he was determined to meet the credible fear screening standard, his attorney submitted a parole request. His parole request included evidence of eight U.S. citizen or legal permanent resident family members, school and immunization records, a letter from his church attesting to his identity, along with letters and photographs from his family members in the United States. Despite ample evidence to the contrary, ICE denied parole in a form letter claiming he was a flight risk and danger to the community. He was held in

detention for two years in the West Texas Detention Facility in Sierra Blanca before a writ of habeas corpus was granted and he was released on an ankle bracelet. His case was subsequently denied and he was deported in June before his attorneys could appeal a stay of removal.⁴⁶

Recommendations

Human Rights First urges the Trump Administration to:

- Rescind provisions of the “Border Security and Immigration Enforcement Improvements” executive order that block access to asylum, undermine due process, and violate U.S. treaty commitments.
- Abandon schemes that turn away asylum seekers at U.S. borders in circumvention of U.S. law and treaty commitments and further restrict access to asylum.

Human Rights First urges the Department of Homeland Security to:

- Stop the practice of turning away asylum seekers without referring them for protection processing or asylum proceedings and strengthen safeguards to identify and properly refer individuals in need of protection, including by strengthening the implementation of protection safeguards in the expedited removal process, as recommended by the bipartisan U.S. Commission on International Religious Freedom.
- Instruct Customs and Border Patrol to cease the practice of referring asylum seekers for criminal prosecution on matters relating to their illegal entry or presence, as such prosecutions generally constitute a violation of Article 31 of the Refugee Convention. Instead, agents should refer them to appropriate protection screening interviews. The

Department of Justice should also cease initiating such prosecutions.

- Ensure local ICE offices follow the ICE asylum parole directive, work with DOJ to provide access to immigration custody hearings for

asylum seekers, and ensure that any future ICE guidance or regulatory changes comply with U.S. treaty commitments under the Refugee Convention and Article 9 of the International Covenant on Civil and Political Rights. ■

Endnotes

- ¹ The Executive Order's aims include, "establishing operational control of the border, establishing and controlling a physical barrier, detaining illegal aliens at or near the border, ending the practice of "catch and release," and returning "aliens" to the territory from which they came pending formal proceedings"; See The White House, "Executive Order: Border Security and Immigration Enforcement Improvements," January 25, 2017, available at <https://www.whitehouse.gov/the-press-office/2017/01/25/executive-order-border-security-and-immigration-enforcement-improvements>; See also Department of Homeland Security (DHS), "Fact Sheet: Executive Order: Border Security and Immigration Enforcement Improvements," February 21, 2017, available at <https://www.dhs.gov/news/2017/02/21/fact-sheet-executive-order-border-security-and-immigration-enforcement-improvements>.
- ² See DHS, "Executive Orders on Protecting the Homeland," available at <https://www.dhs.gov/executive-orders-protecting-homeland>.
- ³ U.S. Customs and Border Protection, El Paso Sector Texas, available at <https://www.cbp.gov/border-security/along-us-borders/border-patrol-sectors/el-paso-sector-texas>.
- ⁴ United States Border Patrol, Southwest Border Sectors, "Family Unit and Unaccompanied Alien Children (0-17) apprehensions FY 16, compared to the same time period for FY 15 and FY 14," available at <https://www.cbp.gov/sites/default/files/assets/documents/2016-Oct/BP%20Southwest%20Border%20Family%20Units%20and%20UAC%20Apps%20-%20FY16.pdf>.
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- ⁶ See U.S. Immigration and Customs Enforcement (ICE), Detention Facility Locator, available at <https://www.ice.gov/detention-facilities>; See also Aaron Martinez, "Temporary migrant processing site set for Tornillo," El Paso Times, November 17, 2016, available at <http://www.elpasotimes.com/story/news/local/el-paso/2016/11/17/cbp-opens-temporary-tornillo-detention-center/94040092/>.
- ⁷ See Human Rights First Letter to Deputy Secretary Alejandro Mayorkas and Commissioner R. Gil Kerlikowske, July 27, 2016; See also American Immigration Council, Complaint Re: U.S. Customs and Border Protection's Systemic Denial of Entry to Asylum Seekers at Ports of Entry on U.S.-Mexico Border filed with DHS Office of Civil Rights and Civil Liberties and DHS Inspector General, January 13, 2017, available at https://www.americanimmigrationcouncil.org/sites/default/files/general_litigation/cbp_systemic_denial_of_entry_to_asylum_seekers_advocacy_document.pdf.
- ⁸ U.S. Customs and Border Protection, "U.S. Border Patrol Southwest Border Apprehensions by Sector," available at <https://www.cbp.gov/newsroom/stats/usbp-sw-border-apprehensions>.
- ⁹ See UN High Commissioner for Refugees (UNHCR), "Women on the Run: First-hand Accounts of Refugees Fleeing El Salvador, Guatemala, Honduras, and Mexico," October 26, 2015, available at <http://www.refworld.org/docid/56307e2a.html>; See also UN High Commissioner for Refugees (UNHCR), Children on the Run: Unaccompanied children leaving Central America and Mexico and the Need for International Protection, 2014, available at <http://www.unhcr.org/en-us/about-us/background/56fc266f4/children-on-the-run-full-report.html>; See also UNHCR, "UNHCR warns of looming refugee crisis as women flee Central America and Mexico," October 28, 2015, (In connection with the release of Women on the Run, UNHCR stated: "The dramatic refugee crises we are witnessing in the world today are not confined to the Middle East or Africa," Guterres said. "We are seeing another refugee situation unfolding in the Americas. This report is an early warning to raise awareness of the challenges refugee women face and a call to action to respond regionally to a looming refugee crisis."); UNHCR, "U.S. announcement on Central America refugees highlights seriousness of situation, UNHCR," January 14, 2016, (In connection with the U.S. announcement of refugee

processing in the region, UNHCR stated: "The U.S. initiative to resettle Central American refugees is a welcome step to help address the growing refugee crisis." The UN refugee agency reiterated its serious concern for the welfare of large numbers of people who continue to flee deadly violence in El Salvador, Guatemala and Honduras – the Northern Triangle of Central America.).

- ¹⁰ Human Rights First Interview, February 15, 2017 (A Human Rights First researcher met with a total of seven lawyers and 16 local leaders and advocates, from 14 different organizations).
- ¹¹ Human Rights First Interviews, February 16, 2017; Sam Quinones, "Once the World's Most Dangerous City, Juarez Returns to Live," National Geographic, June 2016, available at <http://www.nationalgeographic.com/magazine/2016/06/juarez-mexico-border-city-drug-cartels-murder-revival/>; Kirk Semple, "Mexico Grapples With a Surge in Violence," The New York Times, December 13, 2016, available at https://www.nytimes.com/2016/12/13/world/americas/mexico-drug-war-violence-donald-trump-wall.html?_r=0.
- ¹² See American Immigration Council, *supra* note 7.
- ¹³ Human Rights First Correspondence with local advocates, February 22, 2016.
- ¹⁴ See The White House, *supra* note 1; DHS, "Implementing the President's Border Security and Immigration Enforcement Improvement Policies," February 20, 2017, available at <https://www.dhs.gov/publication/implementing-presidents-border-security-and-immigration-enforcement-improvement-policies#>.
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- ¹⁶ See 8 U.S.C. § 1225.
- ¹⁷ The White House *supra* note 1; DHS, *supra* note 14.
- ¹⁸ See Guy S. Goodwin-Gill, Article 31 of the 1951 Convention Relating to the Status of Refugees: non-penalization, detention, and protection, UNHCR, available at <http://www.unhcr.org/en-us/publications/legal/419c778d4/refugee-protection-international-law-article-31-1951-convention-relating.html>.
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- ²¹ TRAC, "Criminal Immigration Prosecutions Fall 22 Percent," January 20, 2016, available at <http://trac.syr.edu/immigration/reports/412/>.
- ²² Lauren Villagran, "Immigration cases swamp federal court system," Albuquerque Journal, December 27, 2016, available at <http://www.lcsun-news.com/story/news/local/new-mexico/2016/12/27/immigration-cases-swamp-federal-court-system/95882220/>.
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- ²⁵ ACLU, "ACLU calls on HSAC to urge immediate moratorium on expansion of immigration detention," October 26, 2016, available at https://www.aclu.org/sites/default/files/field_document/aclu_letter_to_hsac_10.26.16_reduced.pdf; See also Matt Zapotosky, "The Justice Department closed this troubled private prison. Immigration authorities are reopening it," The Washington Post, October 27, 2016, available at https://www.washingtonpost.com/world/national-security/the-justice-department-closed-this-troubled-private-prison-immigration-authorities-are-reopening-it/2016/10/27/6e52855e-9b87-11e6-a0ed-ab0774c1eaa5_story.html?utm_term=.0c0a3c32c6f0; See also Human Rights First interviews, February 16, 2017.
- ²⁶ Similar to Credible Fear Interviews, Reasonable Fear Interviews are conducted with immigrants who are subject to expedited removal, claim a fear of return to their home country, and have been previously removed from the United States.
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- ³¹ See DHS, *supra* note 14.

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- ³⁷ See Human Rights First, “Detention of Asylum Seekers in Georgia,” September 22, 2016, available at <http://www.humanrightsfirst.org/resource/detention-asylum-seekers-georgia>.
- ³⁸ See Human Rights First, “Detention of Asylum Seekers in New Jersey,” November 17, 2016, available at <http://www.humanrightsfirst.org/resource/detention-asylum-seekers-new-jersey>.
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- ⁴⁰ TRAC, “Detainees Leaving ICE Detention from the Otero County Processing Center,” available at <http://trac.syr.edu/immigration/detention/201509/OTRPCNM/exit/>; TRAC, “Detainees Leaving ICE Detention from the West Texas Detention Facility,” available at <http://trac.syr.edu/immigration/detention/201509/WTXDFTX/exit/>.
- ⁴¹ TRAC, “Detainees Leaving ICE Detention from the El Paso Service Processing Center,” available at <http://trac.syr.edu/immigration/detention/201509/EPC/exit/>.
- ⁴² Human Rights First interviews, February 15, 2017; See also Borderland Immigration Council, *supra* note 28.
- ⁴³ *Ibid.*
- ⁴⁴ See Borderland Immigration Council, *supra* note 28; See also Corey Price, LinkedIn <https://www.linkedin.com/in/corey-price-50a57889/>; see also TRAC, “Detainees Leaving ICE Detention from the Stewart Detention Center,” available at <http://trac.syr.edu/immigration/detention/201509/STWRTGA/exit/>.
- ⁴⁵ Human Rights First interviews, February 15-16, 2017.
- ⁴⁶ See Borderland Immigration Council, *supra* note 28; See also Human Rights First correspondence with local advocates, February 26, 2016.



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