

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

COALITION FOR HUMANE IMMIGRANT  
RIGHTS, et al.,

*Plaintiffs*

v.

U.S. DEPARTMENT OF HOMELAND  
SECURITY, et al.,

*Defendants.*

Case No. 1:25-cv-00943

**DECLARATION OF ANGELICA SALAS IN SUPPORT OF PLAINTIFFS'  
MOTION FOR A STAY OF EFFECTIVE DATES UNDER 5 U.S.C. § 705  
OR, IN THE ALTERNATIVE, PRELIMINARY INJUNCTION**

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FOR THE DISTRICT OF COLUMBIA**

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RIGHTS, *et al.*,

*Plaintiffs,*

v.

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*Defendants.*

Case No.

**DECLARATION OF ANGELICA SALAS, EXECUTIVE DIRECTOR  
OF THE COALITION FOR HUMANE IMMIGRANT RIGHTS (“CHIRLA”)**

I, Angelica Salas, upon my personal knowledge, hereby declare as follows:

1. I am the Executive Director of the Coalition for Humane Immigrant Rights (“CHIRLA”). I have held this position since 1999. In this capacity, I oversee all of CHIRLA’s program areas and am responsible for strategic planning and CHIRLA’s annual budget.
2. CHIRLA is a nonprofit organization headquartered in Los Angeles, California, with ten offices throughout California and a national policy office in Washington, D.C. CHIRLA was founded in 1986 and its mission is to advance the human and civil rights of immigrants and refugees and ensure immigrant communities are fully integrated into our society with full rights and access to resources.

**CHIRLA’S MISSION**

3. CHIRLA's mission is to ensure that immigrant communities are fully integrated into our society with full rights and access to resources. CHIRLA’s first director was Father Luis Olivares, the pastor at Our Lady Queen of Angels Church. As a leading voice of the Sanctuary

movement, Olivares used his church to protect refugees fleeing human rights abuses in Central America in the 1980s. Since its founding in 1986, CHIRLA has continued to advocate for immigrant rights, organizing, educating, serving, and defending immigrants and refugees in Los Angeles and throughout California.

4. Today, CHIRLA is the largest statewide immigrant rights organization in California, with fourteen unique departments and over 185 staff members who help provide a range of services that reach tens of thousands of Californians each year. For example, over the last three years, CHIRLA's education programs have reached over 820,000 people through more than 7,800 events and its legal department has assisted approximately 30,000 people. In furtherance of its mission, CHIRLA handles the full spectrum of needs of those primarily residing within low-income immigrant communities in an area with very high costs of living and in areas of California that have long been under-served.

5. CHIRLA is a membership-based organization, funded, in part, by its approximately 13,000 dues-paying and active members. The fee for an individual membership is a minimum of \$25, although families may become members for \$60. The majority of our members are low-income immigrants in mixed status families, one or more of whom are undocumented. Some are members first, who due to circumstances then become legal service clients, while others are clients before they become members.

6. CHIRLA has approximately 50,000 active members across California. Our membership is diverse, and includes U.S. citizens, non-U.S. citizens with lawful status, and non-U.S. citizens without lawful status. Many of our members belong to mixed-status families—that is, families consisting of both individuals with citizenship or lawful status and individuals without. Most of our members are low-income. CHIRLA educates its membership as well as our broader

community through know-your-rights trainings, workshops, social media and educational literature about a variety of social services and benefits, including immigration law, financial literacy, workers' rights, and civic engagement.

7. In 2012, CHIRLA launched its legal services program to support its members and others in the community in seeking the benefits and protections of Deferred Action for Childhood Arrivals ("DACA"). Since then, we have expanded our legal services program, first by representing clients in applying for permanent residence and citizenship as well as other applications before U.S. Citizenship and Immigration Services ("USCIS"), including family-based petitions, Special Immigrant Juvenile Status petitions, Military Parole in Place, and U visas, and then expanding in 2017 to representing individuals in removal proceedings in immigration court. We now have three main components within the Department of Legal Services: 1) Programs and Subcontract Administration; 2) Worker Rights and Labor; and 3) Legal Programs, with over sixty staff members across the components. Subcontract Administration oversees funding from the California Department of Social Services, the County of Los Angeles, and the City of Los Angeles, and in this way helps ensure wider access across the State of California to legal services. Among the subcontractors are other nonprofit organizations as well as California State Universities Chico, Humboldt, Sacramento, and Sonoma. Within Legal Programs, we have distinct Removal Defense, Clinical, and Family Unity units, as well as our Student Legal Services Program. During the past three years, CHIRLA has conducted nearly 30,000 legal consultations and has assisted with hundreds of immigration matters, including I-130 family petitions and attendant adjustments of status, Military Parole in Place cases, consular processes, as well as humanitarian-based applications including asylum, U visas, and Special Immigrant Juvenile Status (SIJS) and Violence Against Women Act (VAWA) petitions.

8. CHIRLA's programs also include a hotline where individuals—including members, clients, and community members can call with questions. The assistance hotline that CHIRLA operates fields on average 15,000 calls per year. Given CHIRLA's deep community ties and longstanding legal services programs, CHIRLA is often a first point of contact for individuals seeking information about recent policy changes impacting immigrants. The hotline is staffed by members of CHIRLA's Community Education team who can refer callers to Legal Programs staff as needed as well as to regular triage services where intakes are conducted.

9. Student Legal Services Program (SLS) is part of Legal Programs and provides limited legal assistance to college students across 14 community colleges and four California State University (CSU) campuses. Additionally, at the CSU campuses, the assistance can also extend to family members. These services include immigration consultations, affirmative immigration applications like DACA renewals, naturalization and family-based petitions, as well as know-your-rights sessions. This program dovetails with CHIRLA's longstanding advocacy on behalf of DACA recipients and immigrant youth more broadly and is funded through a state grant specifically for providing immigration legal services to college students.

10. In addition to member dues, CHIRLA also receives funding through private foundations and state and local grants. Many of these other sources of funding come with expectations or requirements that CHIRLA achieve certain metrics in its immigration services work. For example, CHIRLA receives grants that are predicated on the organization meeting specified deliverables, which can include representing a set number of individuals or achieving certain outcomes. For at least one of CHIRLA's contracts to provide removal defense representation, the organization receives funding on a "per case" basis - i.e., a set amount of funding for each new client whose case CHIRLA contracts to accept for representation. Payments under this contract

are made in stages, with a percentage of the funding paid to the organization at the beginning of the funding cycle, mid-cycle, and when the contractual obligations have been fulfilled.

11. Funding from private grants and contracts with public agencies are critical to CHIRLA's ability to provide essential services in furtherance of its mission and to deliver to the full scope of benefits CHIRLA affords its members. If one significant stream of funding is compromised, the effects ripple across the organization. If CHIRLA were to be unable to meet its deliverables, the organization's grantors would either not reimburse CHIRLA for its expenses, require that CHIRLA continue the work needed to complete its commitments but without additional funding for staffing or to cover the increased costs, and in some instances would decrease or decline to renew funding in the future. With our contract to provide removal defense representation, if CHIRLA were to be unable to take on the number of new cases promised, our organization would not receive the balance of the funds under the contract and would have to return the funds provided to that point for those cases. Thus, an inability to meet case acceptance and completion goals leads to diminished funding for the organization. In the process, CHIRLA's reputation in the grantor community would also be harmed, jeopardizing future funding.

12. In addition to its education initiatives and legal services, CHIRLA engages in policy advocacy efforts on behalf of its members at the local, state, and national levels. For example, a recent CHIRLA campaign focused on advocacy for stronger health and safety protections for domestic workers. This campaign began in response to COVID-19, where domestic workers were at the forefront of the pandemic. Since then, CHIRLA has been supporting state legislation that would remove an exemption that denies domestic workers the same health and safety protections as other workers.

13. CHIRLA reaches its members and community members through in-person meetings and

events throughout California and through its virtual platforms, including a Facebook Live series “CHIRLA en tu Casa,” CHIRLA TV YouTube channel, and TikTok. Organizers, along with legal and communications staff, work collaboratively to prepare materials and content for these events that are geared towards members and non-members alike.

14. CHIRLA regularly submits comments on agency rules and regulations that impact its members and the communities it serves. CHIRLA plans to submit a comment on the Interim Final Rule (“IFR”) explaining how it will be burden our organization and members. However, given the mere 30-day comment period and the fact that the agency is not considering public comments before finalizing the rule, the comment will not be as robust as when we submit them through the regular rulemaking process.

#### **HARM TO CHIRLA AS AN ORGANIZATION**

15. The new registration requirement created by the IFR will impact CHIRLA across the organization: its programming, staffing, communications, and funding. The community members CHIRLA serves have already begun reaching out to its hotline and at community events with questions about the registration requirement, leading staff to reallocate their time to addressing concerns and revising materials and presentations to address these growing concerns.

16. If the regulation goes into effect, CHIRLA will be overwhelmed by individuals in need of legal advice and assistance with the new registration process. CHIRLA has thousands of current and former clients in its Legal Programs, many of whom will need to register even if they have some kind of pending application for immigration relief, for example family-based petitioners where the applicants are awaiting priority dates and have not yet undergone biometrics. Further, even those who do not need to register will likely seek legal advice to determine if they need to register. Indeed, of the numerous calls CHIRLA has already received

about registration, many community members have asked whether DACA recipients or TPS holders have to register.

17. Since CHIRLA serves its members, legal services clients, and community members alike, it expects thousands of individuals are likely to reach out for assistance and advice with the new registration process. Addressing this volume of community needs will impact multiple programs and will strain its staff and budget. Specifically, the hotline staff will not be able to keep up with the volume of callers regarding registration once greater awareness is reached in the community. Just last week, CHIRLA sent an e-blast to its members outlining registration and previewing a call to action on how to file a public comment on it.

18. Further, Legal Services attorneys and staff will not be able to provide legal advice or assistance to all of those in need while managing their current caseloads. CHIRLA has already identified over a hundred current clients who may have to register, including around 60 particularly vulnerable U-visa applicants who have not had their biometrics taken. Reviewing client files to determine who will need to have a separate consultation about registration is also diverting significant staff resources that will only increase if the rule goes into effect. This case review will be particularly challenging and time-consuming given that the IFR is silent with respect to many of the immigration benefits our clients have applied for and due to absence of any instructions for the G-325R on the USCIS website. Another complexity in determining whether clients would need to register under the IFR is ascertaining their manner of entry and whether they were served with a Notice to Appear or paroled. For some clients, CHIRLA legal staff will need to file Freedom of Information Act (“FOIA”) requests to make those determinations.

19. The need for legal advice and assistance with the registration will further impact CHIRLA’s core legal work and compliance with existing grants and deliverables. As noted



above, CHIRLA's Legal Programs grants are allocated for provision of legal services leading to affirmative immigration benefits (for example, DACA renewals, U visas, or naturalization) or to defend individuals in removal proceedings from deportation. The registration requirement does not meet the criteria for these grants as it does not confer a benefit but instead is a requirement to avoid civil and criminal penalties. CHIRLA is required by its mission and its ethical obligations to its clients to assist members, clients and community members with the registration process. However, this would require CHIRLA to divert its staff to assist them at the expense of grant compliance, particularly those involving "per case" deliverables. Noncompliance with grant requirements will likely result not only in withholding of disbursements during the next funding cycle, but also in CHIRLA's eligibility to apply for future grants.

20. Another example of how CHIRLA's current resources would need to be diverted would be responding to the needs of immigrant youth. The grant funding it receives under the Student Legal Services Program to assist students on college campuses is undertaken as "limited legal services" that do not create a long-term attorney-client relationship. Nonetheless, because California college students are familiar with CHIRLA—and because of its longtime advocacy for immigrant youth through its DACA work and other campaigns—they will look to CHIRLA for advice and assistance with the new registration requirement. CHIRLA has already received increased inquiries about the registration requirement from students who are concerned that they or their family members would be subject to it. However, responding to these inquiries, and/or advising and assisting students about it, would not fall within the scope of legal services covered by the grant. Given CHIRLA's commitment to immigrant youth and its existing relationships with students that is core to its mission, CHILRA will be compelled to respond to these inquiries.

21. Even though many of CHIRLA's hundreds of existing clients across its Legal Programs

may be considered to have already “registered” because of the past services they receive, they will want to seek clarity about the new process and will likely have concerns about whether family members will be required to register. Given that the new registration rule is unclear as to whether individuals with certain types of immigration statuses, benefits, and visa categories are considered registered—and the absence of instructions—Legal Programs staff will need to expend significant time counseling current clients.

### **HARM TO CHIRLA’S MEMBERS**

22. Many of CHIRLA’s members will experience harm as a direct result of the IFR. As its members have a variety of immigration statuses and/or belong to mixed-status families, the IFR will create uncertainty of which members are considered “registered.” Even those who are registered may have children or family members who would be required to do so.

23. The following members would be newly required to register under the IFR.<sup>1</sup>

24. “Ursela” is an 18-year-old CHIRLA member who lives in California. She entered the U.S. without inspection in 2023 as an unaccompanied minor when she was 17. She fled El Salvador with her mother after suffering years of severe physical abuse by her father, but they were separated on their journey. After making inquiries with the Salvadoran Consulate, she learned that her mother is officially listed as a missing person in Mexico. Ursela, who is not in removal proceedings, has filed for asylum but has not yet had biometrics taken; she is also applying for Special Immigrant Juvenile Status based on her parental circumstances. Despite pursuing these lawful pathways to permanent status, Ursela would be required to register pursuant to the IFR. She knows that the government wants to use the registration process to deport people, and that the government has already deported people even though they have pending asylum applications. She fears she could be targeted for

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<sup>1</sup> All member names in this declaration are pseudonyms.

enforcement before her applications are approved and be deported to El Salvador, where she faces persecution.

25. CHIRLA Member "Tiana" is a forty-two-year-old woman who came to the U.S. at the age of 15 with her family. In the U.S., she initially worked as a seamstress to help the family out and was unable to complete her education. Tiana married a U.S. citizen who abused her and never helped her adjust her status. She is currently in the process of self-petitioning for protection under the Violence Against Women Act (VAWA) but has not yet filed Form I-360 or undergone biometrics. Even when she files, the Form I-360 used for VAWA petitions is not included in the IFR as evidence of registration, so Tiana would still be required to register.

26. Tiana is a single parent of a U.S. citizen son who is in second grade. To help support him, she eventually earned her G.E.D. She worked in a restaurant that burned down during the recent Los Angeles wildfires, but with the help of one of her former colleagues she has taken the first step to fulfilling a long-held dream of opening her own restaurant. She wants to serve a fusion of Oaxacan and American cuisine. She is terrified that registering could make her a target for immigration enforcement given the government's public statements that registration is intended for that purpose. This would prevent her from pursuing her VAWA petition and, worse, could separate her from her son.

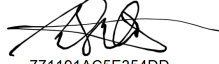
27. CHIRLA Member "Luisa" is a 48-year-old domestic worker who has been in the U.S. for nearly 20 years, when she entered without inspection. She is the spouse of a CHIRLA client who has temporary protections, but she is not eligible for this form of protection herself and would have to register. Together they have 2 U.S. citizen children, 11 and 15 years old. Luisa is a very active CHIRLA member and a part of the Domestic Workers organizing group. During the COVID-19 pandemic, she was an essential worker who volunteered to clean classrooms in her own children's

school, focusing on those for the youngest age groups. She advocates for better work conditions for her profession in Los Angeles, Sacramento and on the national level via the Domestic Workers Alliance. In particular, Luisa has worked to assist indigenous domestic workers, receiving training on how to preserve indigenous languages and act as an interpreter. Additionally, Luisa champions better housing and helping to get out the vote. On numerous occasions, she has participated in pro-immigrant protests and she also attended the Women's March. She is fearful of the registration process and that she will be specifically targeted for enforcement because of her advocacy on behalf of undocumented workers.

28. For CHIRLA's members, as well as their families and communities, the IFR's registration requirement is causing fear and confusion. If it goes into effect, it will give CHIRLA's members and families an impossible choice of facing criminal charges or facing potential deportations regardless of their family and community ties--and significant contributions--to the United States.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on March 29, 2025 in Los Angeles, California.

DocuSigned by:  
  
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Angelica Salas