

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

**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.

**DECLARATION OF ELIZABETH STRATER,
NATIONAL VICE PRESIDENT AND DIRECTOR OF STRATEGIC CAMPAIGNS,
UNITED FARM WORKERS OF AMERICA (“UFW”)**

I, Elizabeth Strater, declare:

1. I serve as Director of Strategic Campaigns and National Vice President of the United Farm Workers of America (“UFW”). I have worked for UFW since 2017 and have been National Vice President since I was elected by a Convention of farm worker union members in September 2024. As a member of the elected Union Executive Board, I help direct the union’s work in organizing, negotiating, public campaigns, rulemaking, legislative campaigns, and wide-reaching advocacy on behalf of farm workers.
2. As Director of Strategic Campaigns, I direct campaigns on behalf of farm workers to empower them to improve their safety, wages, and working conditions and to underscore their basic human dignity. An important part of my role is to humanize the essential contributions of farm workers and to protect the rights of UFW’s membership, the majority of whom are

immigrants. I have detailed knowledge about UFW's membership demographics, membership criteria, member needs and priorities, and how members direct UFW's mission and advocacy.

3. As part of my role as Director of Strategic Campaigns and National Vice President, I regularly hear from UFW members about their safety, wages, working conditions, immigration issues, and other concerns members face in their communities. I also hear these concerns communicated through UFW organizers who speak directly with members and report to the Board. In recent weeks, I have heard from numerous organizers and union members who are concerned about the new registration process set forth in an Interim Final Rule ("IFR") and who have questions about how registration will impact themselves and other members.

UFW's Mission & Membership

4. UFW is the first and largest farm worker union in the country. It represents thousands of migrant and seasonal farm workers in various agricultural occupations throughout the United States. UFW is headquartered in Kern County in Keene, California.

5. Founded in 1962 by Cesar Chavez, Dolores Huerta, Larry Itliong and other leaders, UFW was created from the merger of workers' rights organizations to form one union. Our mission is to improve the lives, wages, and working conditions of agricultural workers and their families. UFW has members throughout California, and in Oregon, Washington, and New York.

6. To fulfill our mission, UFW engages in collective bargaining, worker education, advocacy, state and federal legislation, and public campaigns. Our stated values are integrity, "Sí se puede" attitude, dignity, and innovation. We promote total nonviolence as a core tenet. As a result of UFW's work, thousands of agricultural workers are protected under UFW contracts. UFW has also sponsored and advocated for legal reforms to protect all farm workers at the state and federal level, including on issues related to overtime pay, heat safety, pesticides safety, COVID-19 protections, and other policies to protect farmworkers and advance their rights.

7. As part of this work, UFW is a national leader in the movement for immigration reform and immigrants' rights. We have spearheaded national campaigns and congressional lobbying efforts to raise public awareness of the critical role migrant farm workers play in our communities and economy and to advocate for immigration reform, including a path to citizenship for farm workers.

8. As of March 2025, UFW has approximately 7,000 members.

9. UFW membership is voluntary and consists of various categories of members. Among these, contributing or associate members are individuals who make a monthly or annual contribution of a designated amount to UFW. Dues-paying members are those who benefit from a UFW collective bargaining agreement. In addition to these categories, UFW recognizes other forms of membership, including full-time employees who have been employed for at least two years, individuals recognized as martyred members due to their sacrifice in the struggle for social justice, honorary members who are family members of martyred members, and retired members who contribute voluntarily after leaving active employment.

10. Generally, individuals seeking to become contributing or associate members of UFW complete an official application, which is reviewed and processed by UFW staff for approval. Dues-paying members become members through the procedures set forth in the California Agricultural Labor Relations Act or other applicable laws, their collective bargaining agreements, and union rules.

11. UFW members play an important role in deciding what activities UFW engages in as an organization. At UFW's quadrennial Constitutional Convention, members introduce and vote on motions to govern and guide the union's work, and to elect the Union Executive Board. On an ongoing basis, UFW members respond to surveys, provide feedback, and participate in advisory meetings (known as "consejo de base" in Spanish) to actively participate in the Union's decisions.

UFW has created various programs in response to members' feedback and requests. For example, in 2008, in response to requests from our members, we created educational scholarships for students who are working toward an undergraduate degree and are either eligible UFW members or their dependents in California, Oregon, and Washington state.

12. UFW membership comes with a variety of benefits. Dues-paying members receive protections in the form of collective bargaining in which UFW engages on their behalf. Through an established negotiating committee comprised of workers, UFW members negotiate benefits such as medical insurance, pension, wages, paid time off, working conditions, seniority, right to recall, equipment provisions and other terms of employment.

13. Members reach out to UFW seeking assistance, advocacy, advice, and information, and to raise concerns that their communities are facing. My team is in constant contact with UFW's membership. Members guide the organization at Conventions and quarterly consejo de base (advisory) meetings and will reach out to union staff, including me and my direct reports, on a daily basis.

14. UFW members in Kern County were recently impacted, directly and indirectly, by Border Patrol's January 2025 enforcement operation, "Operation Return to Sender," in which hundreds of Latinos were arrested and detained, many of whom had a lawful status. In response to the harm it inflicted on UFW members, we mobilized quickly to support our members. We connected members with immigration attorneys and helped them identify where their loved ones were being detained. We aided farm workers by helping to arrange travel between their homes and Border Patrol's detention centers, often hundreds of miles away. When breadwinners were detained or summarily expelled from the country, we assisted affected families in locating emergency food, diapers, and infant formula supplies needed for survival.

15. Despite UFW’s efforts to support members and their families, the harms from “Operation Return to Sender”—and Border Patrol’s statements that they will replicate their operations elsewhere in California—has stoked fear among farmworker communities, including among documented farmworkers. UFW members have reported that they are terrified that Border Patrol will—again—arrest people without regard to how long someone has been living in the community or the family members they have waiting for them, including young children.

16. This climate of fear has raised significant concerns among UFW members about the registration process set forth in the new IFR. These concerns are coming from members with a variety of immigration statuses, including those who are already considered “registered,” but are worried about the online process and how it will affect them and their families.

17. The UFW frequently submits comments on rules and regulations that directly impact farm workers. UFW only submits comments when it has had the opportunity to solicit input from its members. Given the 30-day deadline for commenting on the IFR and the fact that the agency has already finalized the language of the regulation without public input, UFW will not have the capacity to write a comment in this timeframe, despite the registration’s negative impact on its members. If the time period were extended, UFW would have more time to speak to its members and to submit a comment that incorporates their perspectives.

UFW Members Who Will be Harmed by the Registration Requirement

18. Each of the following members would be newly required to register and be fingerprinted under the IFR.¹

19. UFW Member “Ana” is a 50-year-old indigenous farmworker from Oaxaca. She has dedicated 24 years to the strawberry and blueberry harvests in Oxnard, California. She is a single

¹ All member names in this declaration are pseudonyms.

mother of six children, four US-born citizens aged 16, 18, 20, and 22, and two undocumented children aged 32 and 30. Ana lost her husband to murder in 2010 and was left to provide for several children alone. She has been a UFW supporter since 2014, participating in general meetings, marches, and holiday activities. Ana speaks a thousand-year-old indigenous language, Mixteco Bajo, and has very little understanding of Spanish or English.

20. Having to focus on work to provide for her family left Ana very little time to learn how to read, write, or speak Spanish. She worries about the registration requirement because she is extremely unfamiliar with technology and has always needed assistance with online forms. Ana believes that it would be extremely challenging for her to access, navigate, and understand the registration process given her limited understanding of Spanish and the Internet. She is concerned that she would make a mistake in the process that could be misconstrued as fraud and used against her. She worries about both immigration and criminal consequences of registering given that she is the sole provider of four children.

21. UFW Member “David” is a 69-year-old farmworker who has resided in Sunnyside, Washington since 2007, after entering without inspection at the Southern border. David has worked for 18 years in various agricultural jobs including apple, cherry, pear, and peach harvests. He has six children, four of whom remain in Mexico and two in the US. One of his children does not have any legal status and one has a temporary status. David has a sixth-grade level education and is unfamiliar with technology and navigating the Internet; he worries about how he will be able to comply with the new registration requirement given the process is only online.

22. UFW Member “Gloria” is a 49-year-old indigenous farmworker from Oaxaca who has dedicated the last six years to harvesting strawberries in Oxnard, California. Her native language is Mixteco Bajo and she speaks limited Spanish and no English. She and her partner have six

children. Gloria and two of her children have received for labor-based deferred action (“DALE”). However, she has four undocumented children ages 16, 18, 21, and 23 who do not qualify for DALE. Although Gloria has a temporary protection and is already considered “registered,” her undocumented children, including her minor 16-year-old child, would be subject to the IFR. She feels extremely vulnerable in her community due to her inability to speak fluent Spanish and navigate technology. She only owns a flip phone that does not have internet access. She feels anxious for the safety of her undocumented teenage son because she will be responsible for registering him, and she would be unable to assist him with the process. She worries her minor child could make a mistake on the registration form—or might lose or forget to carry proof of registration—which could expose him to criminal consequences.

23. These stories illustrate the harm that the registration requirement would cause UFW members. UFW remains committed to advocating for laws and policies that support farm workers and reflect their enormous contributions to their communities and the economy.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 28, 2025.

Los Angeles, California



Elizabeth Strater