

**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 GEORGE ESCOBAR 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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**DECLARATION OF GEORGE ESCOBAR,
CHIEF OF PROGRAMS AND SERVICES, CASA, INC.**

I, George Escobar, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am the Chief of Programs and Services of CASA, Inc. (“CASA”). I have worked at CASA for fourteen years. In my role, I oversee CASA’s portfolio of community-facing direct services, including its health, legal, and educational services; employment and workforce development programs; financial literacy and tax programs; and parent engagement programs. An important part of my role is to understand the needs and experiences of our members so that I can work with my staff to design appropriate interventions to address those needs. I therefore speak frequently with community members and receive feedback from my staff regarding CASA members’ fears, concerns, and decisions.

2. I make this statement based upon personal knowledge, files and documents of CASA that I have reviewed (such as case files, reports, and collected case metrics), as well as information supplied to me by employees of CASA whom I believe to be reliable. These files,

documents, and information are of a type that is generated in the ordinary course of our business and that I would customarily rely upon in conducting CASA business.

3. CASA is a national nonprofit membership organization headquartered in Langley Park, Maryland, with offices in Maryland, Virginia, Pennsylvania, and Georgia.

4. Founded in 1985, CASA has more than 173,000 lifetime members from across the United States. CASA's members are predominantly noncitizens in a variety of immigration statuses.

CASA's Mission and Activities

5. A CASA member is a person who shares CASA's values, envisions a future where we can achieve full human rights for all, and is convinced that, when united and organized, we can create a more just society by building power in our working-class and immigrant communities. CASA members play an important role in deciding what campaigns we work on and how CASA serves the community.

6. CASA membership is voluntary. In order to become a member, an individual must apply for membership, pay dues, and subscribe to the principles of CASA. CASA members also must self-identify as members of an immigrant or working-class community.

7. Currently, the annual fee for CASA membership is \$35. Alternatively, individuals may pay a recurring membership fee of \$5 per month. The membership fee can be waived for individuals who experience financial hardship or are otherwise unable to pay. Members are also offered the opportunity, for an additional \$5, to obtain a CASA ID. This is a physical, picture identification card that contains basic information about the member. For many of our immigrant members, this card may be the only type of picture identification they have, other than documents from their home country. In certain jurisdictions, CASA IDs are recognized for the

purposes of engaging with certain government agencies, including the police.

8. CASA's mission is to create a more just society by building power and improving the quality of life in working-class Black, Latino/a/e, Afro-descendent, Indigenous, and immigrant communities. From CASA's beginnings in a church basement, we have envisioned a future with diverse and thriving communities living free from discrimination and fear, working together with mutual respect to achieve human rights for all.

9. In furtherance of this mission, CASA offers a wide variety of social, health, job training, employment, and legal services to immigrant communities, with a particular focus in Maryland, Washington, D.C., Virginia, Pennsylvania, and Georgia. CASA also offers a more limited suite of services remotely to our members across the United States. Those individuals who are not geographically close to a physical CASA office are offered the opportunity to join a national organizing committee, whose members are entitled to vote on CASA's organizational priorities and integrated into our member-led system of internal democratic governance. CASA also conducts campaigns to inform members of immigrant communities of their rights and assists individuals in applying a variety of government benefits. In addition, CASA provides its members with free remote legal assistance, including free legal consultations on immigration issues.

The Interim Final Rule (IFR) and Registration Requirements Directly Harm CASA's Members

10. CASA has many members who are, or are likely to be, directly harmed by the Interim Final Rule and the registration requirements it imposes. Many of our members are noncitizens, including individuals with U.S. citizen children or plans to start families here.

11. CASA has provided legal and other social services to thousands of such individuals and is a national leader in advocating for immigration protections, such as Temporary

Protected Status (TPS), DACA and other forms of relief.

12. Based on CASA's records, I am aware of several members¹ who would be negatively impacted if the IFR were allowed to go into effect:

13. **YL** is a CASA member originally from Mexico who currently resides in Georgia. She entered the U.S. in 2016 without inspection and did not have any contact with immigration authorities. She has never had a case in immigration court or applied for immigration relief. YL has been active with CASA for the last two years, engaging in her local organizing committee, and participating in public demonstrations related to a variety of issues, including housing and climate justice. In support of these issues, she has engaged in lobbying activity with CASA at both the state and national level. Outside of CASA, she has engaged in political activity, including engaging voters to support candidates who champion immigrant communities though she cannot vote herself. YL is the mother of a 5-year-old son, who has a speech impediment and needs occupational and speech therapy. The IFR has caused her to become more afraid to speak out because she fears that it could expose her and her son to targeting by the federal government. With respect to the actual registration process, she doesn't feel like she would be able to complete it because she is not very good with technology, and wouldn't feel comfortable creating an account and completing the form online – especially because she has limited English proficiency, and the form is only available in English. Her biggest fear is that she will be separated from her young son, who is a U.S. citizen, and who has never been cared for by anyone else. That fear keeps her up at night. She is also afraid that her partner, who is the sole wage earner in the family, could be detained and deported as well, depriving them of their only income. YL has been exposed to discrimination in the U.S. because

¹ All names used in this declaration are pseudonyms.

of her inability to speak English, including in the school system when she enrolled her child in pre-Kindergarten and when she reported a situation of bullying at school. The Principal promised to help resolve the situation, but it only got worse. Her son would have night terrors and lost his appetite because of the situation. When she visited her son's classroom, she saw him being bullied without teachers intervening. In contrast, parents who were able to speak English got the support they needed. With CASA, she is fighting for a just immigration system that will allow her and her family to live in peace, free from the fear that this IFR invokes. She sees the deep concern about the IFR and anti-immigrant environment generally from the other parents at her school and wants to continue fighting for immigration reform so that they can speak out and create a better education system for all the children where she lives. Children deserve to have a dignified education, not to live in fear.

14. **ME** is a CASA member originally from Guatemala who currently resides in Pennsylvania. He entered the U.S. without inspection and without contact with immigration authorities in 2004. He has never been placed in removal proceedings or applied for any immigration benefit in the United States. ME currently works as a carpenter and has four children, aged 1, 8, 15 and 18, all of whom are United States citizens. ME proudly pays his taxes every year and abides by all the laws of this country. He has been active with CASA since 2023 and currently sits on our member leadership council, helping to decide on the priorities for CASA in Pennsylvania and across the organization. During his time as a CASA member he has participated in public demonstrations, including a rally for citizenship in Washington DC. Outside of CASA, ME has engaged in political activity to support his preferred candidates, hoping to elect leaders who will improve the lives of immigrant communities and fight for just immigration reform, though he cannot vote himself. He is afraid to register, because it could

expose himself and his family, including his wife who is also undocumented, to the risk of detention and deportation. This would tear his family apart and leave his children, including their one-year-old, without any support. Even if he tried to register, though, like many of our members he would struggle to complete the process due to his limited English proficiency and lack of technical expertise.

15. AC is a CASA member originally from Mexico, currently residing in Pennsylvania. She entered the U.S. without inspection and without contact with immigration authorities in 2000. She has never been placed in removal proceedings or applied for any immigration benefit in the U.S. AC has four U.S. citizen children, ages 9, 12, 13 and 23. She lives with her partner, who is the father of her youngest three children. He is also undocumented and at risk of detention and deportation if forced to register. She has been an outspoken advocate with CASA since 2018, exercising her First Amendment rights to speak out against immigration detention and other issues. AC regularly participates in organizing meetings and has engaged in public protests with CASA as well as lobbying efforts to persuade elected officials in Pennsylvania to support CASA priorities. As a CASA member leader, AC has traveled to Washington DC, to participate in national protests and lobby Congress, and given interviews to the media on issues she is passionate about. She has never been arrested or had any negative interactions with law enforcement in the U.S. and regularly performs community service. Sadly, AC has frequently been the victim of discrimination in the U.S. When she was working in a restaurant, she experienced verbal abuse and threats of deportation from her manager. This is part of what motivates her activism. The IFR has caused her to feel panic about speaking out in public, however, because she fears that she could be targeted and arrested for her actions. She is afraid that if she complies with the registration requirement, immigration will come to arrest her

and separate her from her family, while if she doesn't comply she could be subject to criminal penalties. To her, the IFR represents an attack on the life that she has built in this country and a way to silence her voice. Her children rely on her for support and would be terrified if she were taken away from them. Having lived in the United States for decades, since she was a teenager, after fleeing domestic violence as a child in Mexico, she cannot imagine returning there, to a country she has not known her entire adult life.

16. **JC** is a CASA member originally from El Salvador who currently resides in Virginia. He entered the U.S. without inspection and without contact with immigration authorities in 2014. He has never been placed in removal proceedings or applied for any immigration benefit in the U.S. JC works for a construction company, doing plumbing and electrical work. His elderly father who still lives in El Salvador depends on him for economic support, and if he were unable to work or was deported back to El Salvador his father would not be able to support himself. Recently, his father needed surgery, from which he is still recovering. JC helped pay for the surgery and without the money he sends home his father would not have been able to get the care he needs. JC has been an outspoken advocate with CASA for more than eight years, exercising his First Amendment rights to call for immigration reform and other causes at the state and national level. He has engaged with CASA's organizing committees throughout his time with our organization, and has been an outspoken public activist, participating in lobbying elected officials, engaging in marches and rallies, as well as speaking to the media about issues that are important to him personally and to CASA's membership generally. He believes that there is strength in unity, and that it is vital for people to feel free to come together to fight against injustice. JC thinks the community must be empowered with information and education about their rights, while building hope for a better future together.

The IFR makes him afraid to speak out publicly, because his political views and the policy positions he believes in are not aligned with the current administration. If he complies with the regulation and registers, he is afraid that he could be targeted and persecuted for his activism, while if he does not comply with the requirement he could be subjected to criminal penalties. Additionally, he does not trust the registration process online, because he is afraid of government surveillance. He is very careful with how he interacts with the internet on his phone and other devices. He doesn't want them to be able to access his sensitive and private information.

17. ALDC is a CASA member originally from Honduras who currently resides in Virginia with her husband. She entered the United States without inspection and without contact with immigration authorities in 2006. She has never been placed in removal proceedings or applied for any immigration relief in the United States. Her husband also does not have lawful immigration status and would be required to register under the IFR. ALDC has three United States citizen children, ages 12, 14 and 16. Her youngest child has complications from meningitis that requires constant medication with antibiotics and regular doctors' visits to ensure that the infection is under control. The meningitis is in his brain and he required surgery on it right after he was born, when he was only four months old. ALDC has been an active leader with CASA over the last three years, speaking out about issues that are important to her through CASA's organizing committees and through participation in public actions like marches and rallies. She decided to become a leader with CASA because she saw the need to take action to build community power and solidarity. The IFR makes her afraid to speak out because she feels like she might be targeted by the government for her participation. She is also afraid to register with the government because she believes it will lead to her detention and potential deportation. Her children need her and if they were separated they would have no one to take

care of them other than her husband, who is also at risk of deportation. Her youngest son would not be able to get the medical care and support he needs in Honduras and her other children would be at risk of being victimized by gangs or other bad actors – whether they were here, in the United States without her or if they were forced to go with her to Honduras. Additionally, she doesn't even know how she would complete the registration requirement, since she doesn't read or understand English well and isn't good with computers, so she wouldn't feel able to complete the online registration form.

18. NC is a CASA member originally from El Salvador who currently resides in Maryland with her two adult children. She entered the United States without inspection in 2004 and has resided in this country since then. She has never had contact with immigration officials, had a case in immigration court, or applied for any immigration benefit in the United States. NC works as a cleaner and supports her elderly mother who lives in El Salvador. Her mother does not work and depends on the money NC sends to live. NC has been a vocal activist with CASA, giving testimony before elected officials on issues that are important to her. Since 2021 she has participated in numerous public demonstrations with CASA, in support of causes like tenant rights, increased access to healthcare for Marylanders, and expanded immigration protections for people across the country. She has spoken publicly at many of these events, including testifying and lobbying in front of elected officials at the local, state and national government, as well as giving interviews to the media. The IFR has caused her a lot of fear and uncertainty about exercising her right to speak out and caused her to question whether she should participate in the activities she has in the past, because she does not have any protection if the government decides to target her for her speech. More broadly, the IFR has impacted her whole life. She feels that is being offered a terrible choice, between putting herself and her family at risk by giving her

information to immigration officials or being criminalized for failing to comply with the registration requirement. Being deported would be a disaster for her because she would have to abandon the life that she has built here and start over in El Salvador. She doesn't feel like she has a future there and if she were forced to return, she could not come back to the U.S. where her life is. She's most worried, though, about her family, who would lose all the financial support she provides. NC runs a small business and always pays her taxes, contributing to her community in whatever way she can. The income she earns from that business, in addition to supporting her immediate family and her elderly mother, also helps to pay for medicine for her brother, who is very sick. He would not be able to afford that medicine if she could not provide for him. Even if she tried to register, however, she doesn't think she would be able to do so because she wouldn't be able to navigate the process to set up an account and fill out the registration form online. NC has very limited English proficiency and wouldn't be able to read or understand the questions on the form, forcing her to complete and sign something she didn't understand. After living in the U.S. for more than 20 years, NC believes that rather than forcing people like her to fill out a registration form, the government should create a pathway to citizenship for undocumented immigrants living in this country and finally enact immigration reform that respects the dignity and humanity of all people.

19. PH is a CASA member originally from Mexico who now resides in Maryland, with his partner and two children. He entered the United States without inspection and without contact with immigration officials in 2004. Both of his children are U.S. citizens, but his wife is also undocumented and at risk of deportation. He has never appeared before an immigration court in the United States or applied for any immigration benefit. PH works in a church two days a week doing maintenance and the other three days he works at a mechanic's shop. He has

been engaged with CASA for two decades and has participated in a number of our campaigns, including the successful fight to get access to drivers' licenses for immigrants in Maryland. PH routinely participates in public demonstrations with CASA, proudly joining regardless of conditions, including turning out in the rain and snow to lift up his voice for immigrant communities. PH has given numerous interviews to the media over the course of his activism with CASA. Due to the IFR, however, he is afraid to speak out because he fears that he will be targeted by the government. Navigating the process to register would be incredibly difficult for him, with his limited English proficiency posing a huge barrier to his ability to create an online account, let alone fill out the registration form. In addition, he is afraid to register because he believes it could lead to his detention and deportation by immigration officials, with his previous outspoken activism and support of immigrant rights issues a cause for selection prosecution. If he were detained and eventually removed from the U.S., it would leave his children without a father or hope for the future.

20. These members—and countless others like them—represent the human cost of the IFR and the registration requirement. If enforced, the rule will irreparably harm the communities CASA serves by placing families at risk of separation, jeopardizing livelihoods, and cutting off access to essential healthcare and services. It will also exacerbate fear and anxiety among immigrants, especially those who have built their lives here and contribute meaningfully to their communities.

21. Since the IFR's publication, we have already seen an increase in fear and hesitation among our members. Many are choosing not to seek services or participate in civic life due to concerns over government surveillance and deportation. The mental anguish alone—stemming from the possibility of family separation and forced return to countries they fled—has

been severe and widespread.

22. CASA has also been harmed as an organization as a result of the Registration IFR. We have had to devote significant internal resources to developing messaging guidance for our staff and members, explaining the Rule and answering community questions about it. We have devoted staff time that is desperately needed for other things, including other legal services from our legal department and existing priorities for our community organizing department, to building educational materials about the IFR.

23. Had we been offered the opportunity to comment via the Notice and Comment process, CASA could have organized our members to respond to the proposed rule. Given the very short time period for the IFR, and the fact that the government does not even have to consider the comments submitted, we were not able to do so.

24. As noted in the member stories from this Declaration, there are significant technical hurdles to even engaging in the Registration process and the majority of our members, as well as similarly situated individuals in immigrant communities across the country, would not be able to comply with the requirements due to limited English proficiency, lack of technical skills, difficulties accessing the internet and other barriers. Even if they were able to successfully create an online account and try to fill out the registration form, the form itself is confusing. For example, the question that asks “Immigration status at last arrival” in Form G-325R provides a blank text box and only one pre-printed text option in the dropdown menu of answers: “EWI – Entry Without Inspection.”


25. This IFR, which hastily resurrects a registration system that was never meant to fulfill the purpose articulated in the Rule, represents a significant challenge to CASA’s mission, a major burden on our members and staff, and a source of fear and apprehension for our

communities. Both in process and substance, the IFR fails to meet the basic standards of what is required under the law and what we as an organization demand of our government.

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

Executed on March 30, 2025
Washington, District of Columbia

Respectfully submitted,



George Escobar