

No. 25-365

IN THE
Supreme Court of the United States

DONALD J. TRUMP,
PRESIDENT OF THE UNITED STATES, *et al.*,

Petitioners,

v.

BARBARA, *et al.*,

Respondents.

ON WRIT OF CERTIORARI BEFORE JUDGMENT TO THE
UNITED STATES COURT OF APPEALS FOR THE FIRST CIRCUIT

**BRIEF OF THE GLOBAL STRATEGIC
LITIGATION COUNCIL, UNITED
STATELESS AND 49 OTHER IMMIGRANTS'
RIGHTS GROUPS AS *AMICI CURIAE* IN
SUPPORT OF RESPONDENTS**

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IN SUPPORT OF RESPONDENTS**

INTERESTS OF THE *AMICI CURIAE*

*Amici*¹ are 51 immigrants' rights organizations which work with or advocate for immigrants, including, in the United States, those whose children are at heightened risk of denial of the right to acquire U.S. citizenship under the challenged Executive Order. This includes stateless people, asylum seekers, immigrant survivors of domestic

1. Pursuant to Supreme Court Rule 37.6, no counsel for a party authored this brief in whole or in part and no person or entity other than *amici* or their counsel made a monetary contribution to its preparation or submission.

violence or abuse, and Lesbian, Gay, Transgender, Queer, and Intersex (“LGBTQI”) immigrants. Several *amici* have intervened as *amicus* before this Court, the Federal Courts of Appeal, and District Courts as well as before the U.S. Board of Immigration Appeals and various international tribunals.

The Global Strategic Litigation Council is an organization seeking to protect and advance the rights of refugees and other migrants worldwide. The Council unites and supports a global coalition of over 650 NGOs, refugee leaders, lawyers, advocates, and academics, and its members are a diverse group of individual and organizational experts in international law on refugee rights, forced displacement, nationality, and statelessness.

United Stateless is a national organization led by stateless people whose mission is to build and inspire community among those affected by statelessness, and advocate for their human rights.

A complete list of *amici* is included in Annex I.

SUMMARY OF THE ARGUMENT

For well over a century, the Citizenship Clause of the United States Constitution has guaranteed citizenship at birth for nearly all children born on U.S. soil, regardless of the immigration status of their parents. Executive Order 14160 (the “E.O.”) purports to strip the right to U.S. citizenship at birth from children of immigrants whose mothers are deemed to be “unlawfully present” or in a “lawful but temporary,” status and whose fathers are not U.S. citizens or Lawful Permanent Residents

(“LPRs”). See Exec. Order No. 14160, 90 Fed. Reg. 8449 (Jan. 29, 2025). This marks an exceptional break from the Constitution’s text and purpose, statutory law, and this Court’s precedent.

The E.O. condemns many U.S.-born children of immigrants to statelessness and increases the likelihood of infants and other young children being detained and deported to harm, and of families being separated. The E.O. thereby differentially harms vulnerable groups of immigrants by stripping from their newborn children the right to acquire U.S. citizenship. In particular, it harms stateless people, asylum seekers, immigrants who are indefinitely protected against removal on account of a fear of persecution or torture, immigrant survivors of domestic violence or abuse, and LGBTQI immigrants.

Finally, permitting its operation would put the United States in breach of binding international law obligations, such as to ensure children have a genuine and effective opportunity to acquire nationality. The Court should refuse to allow the Constitution’s Citizenship Clause and its codification in statute to be abrogated by executive fiat and affirm the District Court.

ARGUMENT

The E.O.’s redefinition of Constitutional and statutory guarantees of birthright citizenship is harmful to vulnerable² groups of immigrants and their children and

2. Amici use “vulnerable” in the sense that the E.O. renders groups of immigrants vulnerable, not to suggest that immigrants are inherently vulnerable. See U.N. Off. of the High Comm’r for

would violate international law. Indeed, by operation of the E.O., children would “be wrench[ed] from the arms of parents lawfully in the United States” and instead “face deportation, even as their parents remain lawfully in the country.” *Trump v. CASA*, 606 U.S. 831, 916–17 (2025) (Sotomayor, Kagan & Jackson, JJ., dissenting).

Part I establishes how the E.O. creates foreseeable legal chaos, due to its terms and myriad practical obstacles to its implementation. This would harm groups of vulnerable immigrants. Part II demonstrates that these many harms would violate U.S. international law obligations and that the Court must strike down the E.O. in order to avoid putting the United States in breach of these duties.

I. The E.O. Harms Vulnerable Groups of Immigrants

The E.O. would harm vulnerable groups of immigrants and plunge children into a foreseeable, chaotic, legal limbo. Citizenship determinations pursuant to the E.O. would particularly harm (A) children of stateless people and other immigrants who would be rendered stateless and stripped of legal identity and protections; (B) children of asylum seekers and immigrants indefinitely protected against removal on account of a fear of persecution or torture, who would now face increased risk of deportation to harm; (C) immigrant survivors of domestic violence or abuse and their U.S.-born children, whose acquisition of citizenship would be weaponized against them; and (D)

Human Rts. (“OHCHR”), *Principles and Guidelines supported by practical guidance on the human rights protections of migrants in vulnerable situations*, 5, UN Doc. A/HRC/33/67 (Apr. 03, 2018).

LGBTQI immigrant families, whose children's acquisition of citizenship would be jeopardized under a rigid, yet ambiguous, biological-progenitor standard.

A. The E.O. Would Significantly Increase Statelessness in the United States and Expose Stateless People to Harm

For well over a century, the settled understanding of the Citizenship Clause has provided a critical safeguard against statelessness by conferring U.S. citizenship to virtually all children born in the United States, regardless of their parents' status. U.S. Const. Am. XIV cl. 1. The E.O. would strip that protection and render stateless those children whose parents' country does not recognize them as citizens or allow their children born abroad to acquire citizenship. As a result, the E.O. would cause immediate and lasting harm to children born without a nationality and to their families – including by putting them at risk of immigration enforcement and deportation.³

3. Birth registration and thus proof of parentage within the federal system is regulated by state and local authorities, applying varying standards. See, e.g., Jacob Hamburger, *The Consequences of Ending Birthright Citizenship*, 103 WASH U. L. REV. 236-40 (2025). Local control means that availability of proof of key facts required to facilitate subsequent federal citizenship determinations under the E.O. would vary substantially by geography. This would convert routine acts such as registering a birth into high-stakes adjudications of parental status at birth, requiring consideration of, for example, multiple generations of birth certificates or other documents. *Id.* at 240-41.

1. Statelessness Causes Devastating Harms, Including Exclusion from Civic, Social, and Economic Life

Stateless people are not considered nationals by any country by operation of its laws.⁴ The best estimates suggest that there are at least 218,000 people who are stateless or at risk of statelessness in the United States. Donald Kerwin et al., *Statelessness in the United States: A Study to Estimate and Profile the US Stateless Population*, 8 J. ON MIGRATION & HUM. SEC. 151, 153 (June 2, 2020). There is no statutory or regulatory process for granting status to immigrants on the basis of their statelessness. The Department of Homeland Security (“DHS”) issued internal guidance in 2023 articulating relevant criteria for adjudication of claims involving stateless noncitizens and then rescinded that guidance in June 2025, eliminating any administrative framework for considering statelessness claims. See U.S. Citizenship & Immigr. Servs., *USCIS Policy Manual*, Vol. 3, Part K, Statelessness (eff. Oct. 30, 2023), *rescinded by Policy Alert PA-2025-06, Rescission of the USCIS Statelessness Policy* (June 5, 2025). The lack of such a pathway to legal status has long left stateless people in the United States at risk of immigration enforcement, including prolonged detention.

4. The definition of statelessness comes from Article 1(1) of the 1954 Convention Relating to the Status of Stateless Persons, which reflects customary international law. Convention Relating to the Status of Stateless Persons, 360 U.N.T.S. 117 (Sept. 28, 1954); see also International Law Commission, *Draft Articles on Diplomatic Protection with Commentaries*, U.N. Doc. A/61/10 (2006); United Nations High Commissioner for Refugees, *Expert Meeting – The Concept of Stateless Persons under International Law (“Prato Conclusions”)* 2 (2010).

Cf. *Zadvydas v. Davis*, 533 U.S. 678, 684 (2001) (noting Mr. Zadvydas’ statelessness and imposing limits on detention for those with no foreseeable removal prospects).

This Court has recognized the devastating harm of lacking a nationality and of rendering people stateless: “[Statelessness] is . . . the total destruction of the individual’s status in organized society. It is a form of punishment more primitive than torture, for it destroys for the individual the political existence that was centuries in the development.” *Trop v. Dulles*, 356 U.S. 86, 102 (1958). Without a recognized nationality, stateless people are often unable to obtain even the most basic identity documents, including valid U.S. state identification. See, e.g., Jaelyn Diaz, *Living in the shadows: Why stateless people fear Trump’s immigration crackdown*, NPR (Aug. 21, 2025), <https://www.npr.org/2025/08/21/nx-s1-5502366/trump-stateless-citizenship-immigration-birthright>. Those barriers can cascade into a near complete exclusion from economic and social life, preventing a stateless person from opening a bank account, accessing higher education, or working legally. *Id.* Statelessness also can limit access to health care and essential medical services. Patricia Erasmus, *Statelessness, the Right to Health, Policy, and Case Law: The Potential Role of Feminist Development Education and the Campaign for Universal Birth Registration*, in *SYSTEMS THINKING FOR GLOBAL HEALTH: HOW CAN SYSTEMS-THINKING CONTRIBUTE TO SOLVING KEY CHALLENGES IN GLOBAL HEALTH?* 293 (Frédérique Vallières et al., eds. 2023).

The significant increase in statelessness in the United States that would result would strip those impacted of the ability to fully function within society, effectively creating

a vast class of individuals excluded from civic, economic, and social life.

2. The E.O. Would Cause an Unprecedented Increase of Statelessness in the United States

Under the E.O., a child born in the United States to a stateless mother who is “unlawfully present” or in a “lawful but temporary” status, and whose father is not a U.S. citizen or LPR, would be stripped of the right to acquire U.S. citizenship. See Exec. Order at §§ 1–2(a).⁵ If both the mother and the father are stateless, their child would be born stateless. Melissa Stewart, *Birthright Citizenship, Denaturalization and the Specter of Statelessness*, 73 U.C.L.A. L. REV. 170, 186–196 (Jan. 26, 2026). If the mother is stateless and the father is a national of a country that places restrictions on the acquisition of nationality for children born abroad, their child may be at risk of statelessness. Cf. U.N. High Comm’r for Refugees

5. Among other things, the text of the E.O. leaves key terms such as “unlawfully present” undefined and creates a novel “lawful but temporary” classification, which is similarly undefined. Exec. Order at §§ 2, 4. Via sub-regulatory guidance, the government has since proposed conferring the immigration status of their parents on at least some children of immigrants who are stripped of the right to acquire U.S. citizenship, but without statutory authority or regulatory process to do so. U.S. Citizenship & Immigr. Servs., *USCIS Implementation Plan of Executive Order 14160 – Protecting the Meaning and Value of American Citizenship*, IP-2025-0001, 3-4 (July 25, 2025), https://www.uscis.gov/sites/default/files/document/policy-alerts/IP-2025-0001-USCIS_Implementation_Plan_of_Executive_Order_14160%20%E2%80%93%20Protecting_the_Meaning_and_Value_of_American_Citizenship.pdf.

(“UNHCR”), *Handbook for the Protection of Women and Girls*, ch. 5, § 5.2.1, at 187 (1st ed., Jan. 2008), <https://www.unhcr.org/sites/default/files/legacy-pdf/47cfa9fe2.pdf>. The same risk would arise for a child born in the United States if their mother is a national of a country that limits the acquisition of nationality for children born abroad and their father is either stateless or a national of a country which limits the acquisition of nationality for children born abroad.

Children born to mothers who are nationals of one of the 24 countries with gender discriminatory citizenship laws, including those preventing mothers from conferring citizenship on their children born abroad would face particular risk of becoming stateless under the E.O. UNHCR, *Background Note on Gender Equality, Nationality Laws and Statelessness 2025*, 4 (Mar. 7, 2025), <https://www.refworld.org/reference/reports/unhcr/2025/en/149603>; Maarten Vink et al., *The Global State of Citizenship*, 5 (2025) <https://globalgovernanceprogramme.eui.eu/wp-content/uploads/2025/06/The-Global-State-of-Citizenship.pdf>. Children whose parents – particularly mothers – are from such jurisdictions, including Bahamas, the Dominican Republic, Nepal, and Barbados, which limit the acquisition of nationality for children born abroad, see *id.* at 12, would be at a significant risk of statelessness and harmed by operation of the E.O.

The E.O. would create a large number of stateless individuals who no longer have effective access to citizenship, including because they cannot prove their relationship to their parents or their parents’ legal status. A U.S.-born child could be at risk of statelessness because a foreign government has deliberately deleted

their parents' birth records; the child's parents belong to a disfavored ethnic, racial, or religious minority; or their parents' births were never registered due to displacement, poverty, persecution, discrimination, or bureaucratic barriers. See Betsy L. Fisher, *The 'Operation of Law' in Statelessness Status Determinations Under the 1954 Convention*, 33 WIS. INTL. L.J. 254, 260 (2015).

Take, for example, a married woman from Venezuela who fled and entered the United States lawfully with humanitarian parole or who received Temporary Protected Status ("TPS") and is awaiting adjudication of her asylum application and whose spouse is either stateless or cannot transmit nationality.⁶ Her U.S.-born children would be at risk of statelessness under the E.O. because Venezuela's law does not provide for the automatic acquisition of citizenship of children of Venezuelan nationals who are born and remain abroad until majority. Constitución de la República Bolivariana de Venezuela, art. 32 (as amended Dec. 15, 1999) (*Venez.*), <https://www.leyes.io/constitucion/seccion-i-de-la-nacionalidad>. Many Venezuelan families cannot safely return to Venezuela, leaving U.S.-born children at risk of statelessness despite their parents' efforts to protect them from harm. See, e.g., UNHCR, *Guidance Note on International Protection Concerns for Venezuelans – Update I*, 1 (May 2019), <https://www.refworld.org/policy/countrypos/unhcr/2019/en/122601> ("UNHCR considers that for a number of profiles,

6. There are well over 770,000 Venezuelans in the United States, including 117,000 of whom entered on parole and 607,000 estimated to be covered by TPS. See Ana Alanis Amaya & Jeanne Batalova, *Venezuelan Immigrants in the United States*, MIGRATION POLICY INST. (Feb. 6, 2025), <https://www.migrationpolicy.org/article/venezuelan-immigrants-united-states>.

international protection considerations are likely to arise under the 1951 Convention/1967 Protocol relating to the Status of Refugees depending on the circumstances of the individual case”). The impact on children of Venezuelan immigrants alone could cause statelessness in the United States by operation of the E.O. to grow rapidly.

Finally, if placed in deportation proceedings, stateless children risk being deported to countries where they have no connection because they have no country of nationality to designate as a destination upon removal. See Stewart, *The Specter of Statelessness* at 185–86. This risk is all but certain, as the government has begun removing people to third countries where they have little or no connection, including to countries in which they may face incommunicado detention, persecution, and torture upon arrival. See *id.* at 196 (citing *Dep’t of Homeland Sec. v. D.V.D.*, 145 S. Ct. 2153 (2025); *Dep’t of Homeland Sec. v. D.V.D.*, 145 S. Ct. 2627 (2025)).

B. The E.O. Would Put Children of Immigrants Fleeing Persecution and Torture at Risk of Harm

The E.O. uniquely harms the children of those applying for asylum and other immigrants who face a risk of persecution or torture. This includes those who have already been granted withholding of removal (“withholding”) or relief under the Convention Against Torture (“CAT”), forms of indefinite protection from deportation established to comply with international law (see *infra* Section II.A). Among other things, the E.O. makes these children vulnerable to statelessness, deportation to countries where they face irreparable harm, and also raises the risk of family separation.

1. The E.O. Would Deny U.S. Citizenship to Children of Those Fleeing Persecution or Torture

U.S.-born infants whose mothers have an asylum application pending, deemed in a “lawful but temporary” status, and without a U.S. citizen or LPR father, would lose the right to acquire U.S. citizenship at birth under the E.O. Exec. Order at §§ 1–2(a). This could be the case even if a child’s father had been granted protection, given the E.O.’s differential treatment of mothers and fathers. *Id.* Foreign-born children who are included by a parent at the time of the application for asylum are eligible for derivative asylum at the adjudicator’s discretion (conferring such status is not mandatory). 8 U.S.C. § 1158(b)(3)(A). A U.S.-born child of an asylum-seeking parent born after the time of the application may have difficulty being included in a parent’s asylum application. No statute or regulation directly addresses the E.O.’s application to U.S.-born children of asylum seekers and existing law potentially complicates this possibility.⁷ Many children born of asylum seekers and denied their right to acquire U.S. citizenship would thus be left without any legal status (unlike any foreign-born sibling who was included and given asylum

7. Asylum applicant parents would presumably seek to modify their applications to ensure their newborn children delivered after the application was filed are “included” as derivatives, see Immigrant Legal Resource Center, *Application of the Child Status Protection Act to Asylees and Refugees* at 1 (May 2018), https://www.ilrc.org/sites/default/files/resources/applica_child_stat_asylees_refugees-20180521.pdf, in light of the Administration’s ambiguous position. Cf. U.S. Citizenship & Immigr. Servs., *USCIS Implementation Plan of Executive Order 14160* at 2 n. 3 (July 25, 2025).

through a favorable exercise of discretion), and at the mercy of a procedurally complex and fast-changing asylum system.

In addition, children of many immigrants granted indefinite withholding or CAT protection on account of facing persecution or torture (and whose fathers are not U.S. citizens or LPRs) would likewise be left without legal status under the E.O. See U.S. Citizenship & Immigr. Servs., *USCIS Implementation Plan of Executive Order 14160* 3 (July 25, 2025). By statute and regulation, withholding and CAT protections are mandatory forms of relief when the U.S. government finds that return would more likely than not result in persecution or torture. See 8 U.S.C. § 1231(b)(3)(A); 8 C.F.R. §§ 208.16(d)(1), 1208.16(d)(1); Foreign Affairs Reform and Restructuring Act of 1998 § 2242, 8 U.S.C. § 1231 note; 8 C.F.R. §§ 208.16(c)(4), 208.17(a), 208.18, 1208.16(c)(4), 1208.17(a), 1208.18. However, unlike derivative asylum, each family member must independently apply for, establish eligibility for, and be granted such protection. Compare 8 U.S.C. § 1158(a)(3) (providing for a grant of asylum to applicant's spouse and children) with 8 U.S.C. § 1231(b)(3) (not so providing); see also 8 C.F.R. § 1208.16; U.S. Citizenship & Immigr. Servs., *Instructions for Form I-589, Application for Asylum and for Withholding of Removal* (OMB No. 1615-0067), (stating that “[w]ithholding of removal does not adhere derivatively to any spouse or child included in the application; they would have to apply for such protection . . .”). Children born of parents previously determined to face a fear of persecution or torture would thus, like asylum applicants, be left without U.S. citizenship or any legal status.

Even if it were permissible for a U.S.-born infant to apply for asylum, withholding, or CAT protections,

as a practical matter, it would likely be very difficult for a newborn child to establish standalone eligibility for protection. Given the government's expanded use of third-country removals, they may need to endeavor to establish eligibility for fear-based protection not only as to their parent(s)' country of feared harm but also as to any other country the government may subsequently designate. See 8 U.S.C. § 1231(b)(2) and 8 C.F.R. § 241.15; *DHS v. D.V.D.*, 145 S. Ct. at 2153, 2627. Infants seeking asylum, withholding, or CAT protection would all then be exposed to the vagaries of a broken system as well as to the specific dynamics of such proceedings, in which they have no recognized right to provision of counsel. See 8 U.S.C. § 1229a(b)(4)(A) (providing only a privilege of representation "at no expense to the Government"); 8 U.S.C. § 1232(c)(5) (requiring counsel for unaccompanied children and only "to the greatest extent practicable").

There are over three million pending asylum applications in the United States, with over 2.3 million applications pending before the immigration court as of December 2025, and more than one million asylum applications at USCIS as of 2024. See *Immigration Court Quick Facts*, TRAC Reports, https://tracreports.org/immigration/quickfacts/eoir.html#eoir_asylumbl; Citizenship & Immigr. Servs. Ombudsman, U.S. Dep't of Homeland Sec., *Annual Report 2024* (June 28, 2024), https://www.dhs.gov/sites/default/files/2024-07/24_0628_cisomb_2024-annual-report.pdf. In recent years, the backlog led to wait times of nearly four and a half years in immigration court, and over six years with USCIS. See Forum, *Explainer: Asylum Backlogs* (Jan. 23, 2024), <https://forumtogether.org/article/explainer-asylum-backlogs/>. This asylum backlog will only continue to grow,

as USCIS has indefinitely paused processing of all asylum applications as of November 28, 2025. See USCIS Policy Memorandum, *Hold and Review of all Pending Asylum Applications and all USCIS Benefit Applications Filed by Aliens from High-Risk Countries*, (Dec. 2, 2025), <https://www.uscis.gov/sites/default/files/document/policy-alerts/PM-602-0192-PendingApplicationsHighRiskCountries-20251202.pdf>. These asylum delays would consign families impacted by the E.O. to years of legal limbo and uncertainty, which have been shown to be associated with heightened rates of anxiety, depression, and other adverse psychological outcomes. See Aleena Shahzad et al., *The Psychological Impact of Spending a Prolonged Time Awaiting Asylum*, 16 EUR. J. PSYCHOTRAUMATOLOGY 1, 2 (2025).

2. Children of Those Fleeing Persecution or Torture Would Face Statelessness and Deportation to Harm

Under the E.O., any children born to couples seeking asylum in the U.S. or who have withholding or CAT protections would also be at a greater risk of statelessness. Upon having a baby deprived of the right to acquire U.S. citizenship, many asylum-seeking parents would have to consider whether to register their child with the government that persecuted them or allow their child to become stateless. Many asylum seekers and individuals who have won withholding or CAT protections have been persecuted and tortured by the governments of their home countries. As a result, they may not have access to or feel safe seeking consular services from their country of origin. See Reddy Decl. at ¶¶ 29–31, Dkt. No. 2-3, *CASA, Inc. v. Trump*, 793 F. Supp. 3d 687 (D. Md. 2025)

(No. DLB-25-201). Parents may also feel that registering their child with the government which persecuted them could also put a target on their child. See Kate Scanlon, *Expectant Mom Seeking Political Asylum in US Urges Protection of Birthright Citizenship*, OSV News (June 6, 2025), <https://www.osvnews.com/expectant-mom-seeking-political-asylum-in-us-urges-protection-of-birthright-citizenship/>. The E.O. could therefore force asylum-seeking parents to make an impossible choice: remain in the United States to pursue protection and risk their child becoming stateless, or seek documentation from the very government that persecuted them and potentially expose themselves and their child to danger.

The E.O. would also leave many children vulnerable to deportation to the very countries from which their parents fled. Indeed, guidance from the United Nations suggests that children often face a risk of persecution or torture if their parents do – including because of shared identity characteristics, such as race or nationality. See, e.g., UN High Comm’r for Refugees, *Guidelines on International Protection: Child Asylum Claims under Articles 1(A)2 and 1(F) of the 1951 Convention and/or 1967 Protocol relating to the Status of Refugee* (Dec. 22, 2009), <https://www.unhcr.org/sites/default/files/legacy-pdf/50ae46309.pdf>. LGBTQI immigrants, also discussed at Section II. D, *infra*, fleeing abuses illustrate the complexities of these consequences of the E.O. The United States has long recognized that claims from LGBTQI immigrants can establish eligibility for asylum or withholding of removal. See *Matter of Toboso-Alfonso*, 20 I. & N. Dec. 819, 823 (B.I.A. 1990) (affirming finding that the applicant had established membership in a particular social group – that of being gay – and had shown a sufficient risk of

persecution and therefore merited legal protection on that basis). LGBTQI parents who are granted withholding or CAT protection or granted asylum status but whose children are neither granted protection from return to harm nor U.S. citizenship could thus be forced to choose between remaining in the United States while facing separation from their children, or leaving the United States to preserve family unity. For those who relocate, that choice could lead to a risk of persecution or torture on account of their sexual orientation or gender identity, given the widespread nature of such rights abuses worldwide. See U.N. High Comm’r for Hum. Rights, *Investigating and Preventing Unlawful Deaths of LGBTIQ+ Persons*, U.N. Doc. A/79/172 (Sept. 9, 2024), <https://www.unhcr.org/sites/default/files/legacy-pdf/50ae46309.pdf>. The effective outcome would be a Hobson’s choice for innumerable families fleeing harm: remain in the United States and risk separation from their child or children, or depart to a country where they fear – or even have been determined to face – a risk of persecution or torture.

C. The E.O. Would Trap Immigrant Survivors of Domestic Violence or Abuse in Dangerous Situations by Restricting Children’s Access to U.S. Citizenship

The E.O. would allow abusers who are U.S. citizens or LPRs to weaponize their children’s status as leverage over their victims. This disproportionately harms noncitizen women and their U.S.-born children, who could lose access to U.S. citizenship if an abusive parent refuses to confer it or if contacting the U.S. citizen parent would place the noncitizen in a violent, life-threatening situation. Indeed, some children could be rendered stateless as a result.

While domestic violence is an epidemic in the United States, survivors who are present without legal authorization face particularly acute vulnerabilities, such as lower social capital, heightened isolation, and fears of deportation. Abigail M. Morrison et al., *Intimate Partner Violence and Immigration in the United States: A Systematic Review*, 25 *TRAUMA, VIOLENCE, & ABUSE* 846, 847 (Jan., 2024); Joanne Hulley et al., *Intimate Partner Violence and Barriers to Help-Seeking Among Black, Asian, Minority Ethnic and Immigrant Women: A Qualitative Metasynthesis of Global Research*, 24 *TRAUMA, VIOLENCE, & ABUSE* 1001, 1004 (Apr., 2023). Between thirty to sixty percent of women without legal status in the United States are estimated to have experienced domestic violence by an intimate partner and barriers to seeking help are even more pronounced when the abuser is a U.S. citizen. Leslye Orloff et al., *Battered Immigrant Women's Willingness to Call for Help and Police Response*, 13 *U.C.L.A. WOMEN'S L.J.* 43, 48–50, 55 (2003). Noncitizen women, including those who are undocumented, are almost twice as likely as U.S. citizen women to lose their lives at the hands of an abusive partner. Nawal Ammar et al., *Domestic Violence in Immigrant Communities*, 25 *WOMEN & CRIM. JUST.* 1, 8–10 (2015). Studies demonstrate that such women are particularly vulnerable to sexual assault and that their immigration status, particularly for those who are present without authorization, brings increased vulnerability to recurring sexual assault. Martín Sanchez et al., *Sexual Victimization of Immigrant Women*, 31 *VIOLENCE AGAINST WOMEN* 125, 132–35 (2014). Research demonstrates that immigration-related vulnerabilities – including fear of deportation, economic precarity, social isolation, and limited access to services – can exacerbate

domestic violence and significantly deter reporting abuse to authorities, including when one partner is a U.S. citizen. Angela Peralta & Olivia Salcido, *Domestic Violence in Immigrant Communities: Breaking the Cycle*, 14 J. IMMIGRANT & REFUGEE STUD. 1, 6–9 (2011).

The E.O. renders a U.S. birth certificate insufficient as *prima facie* evidence of citizenship. Exec. Order No. 14160, § 2(a) Children born in the U.S. to a mother who is “unlawfully present” or in a “lawful but temporary” status will not be able to acquire U.S. citizenship unless their father is a U.S. citizen or LPR and they are able to prove it to federal authorities. For these children, the father would have to provide paperwork and, conceivably in some instances, DNA testing in order for the child to document their citizenship. Exec. Order No. 14160 § 4(b).

For noncitizens in the United States who experience domestic violence or abuse, the E.O. creates a new coercive mechanism of control. By conditioning a child’s U.S. citizenship on the status of a U.S. citizen or LPR father, it enables an abusive partner to threaten to render their child a noncitizen, or even stateless. In doing so, the E.O. forces noncitizen parents into a Faustian bargain between their own safety and their children’s status. This coercive structure disincentivizes victims from leaving abusive relationships or holding their partners accountable. Alliance for Immigrant Survivors, *Fear and Silence: 2025 Insights from Advocates for Immigrant Survivors of Domestic Violence, Sexual Assault, and Human Trafficking* (Dec. 10, 2025), <https://www.immigrantsurvivors.org/fear-and-silence-report>

Abusive U.S. citizens and LPRs have long weaponized the power they possess under immigration law. According to some estimates, 72.3 percent never file immigration applications on behalf of their noncitizen spouse, and those who do delay an average of almost four years. Mary Ann Dutton, Leslye Orloff & Giselle Hass, *Characteristics of Help-Seeking Behaviors, Resources, and Service Needs of Battered Immigrant Latinas: Legal and Policy Implications*, 7 GEO. J. ON POVERTY L. & POL'Y 245, 259, 292 (2000).

When enacting the Violence Against Women Act (“VAWA”), a bipartisan Congress found that, in particular, domestic battery problems can become exacerbated in marriages where one spouse is not a citizen, and the noncitizen’s legal status depends on his or her marriage to the abuser. See H.R. Rep. No. 103-395, at 26–27 (1993). Given the longstanding regime of conferring citizenship at birth, acquisition of U.S. citizenship was not considered during debate of VAWA.

Congress understood, however, that victims “fear both continued abuse if they stay with their batterers and deportation if they attempt to leave.” *Id.* Congress enacted VAWA’s self-petition process (which allows an immigrant survivor of abuse to sponsor their own immigrant visa), 8 U.S.C. § 1154(a)(1)(A)–(B), precisely because immigrant women’s dependence on their abusers for legal status can prove harmful and even deadly.

By requiring that an immigrant mother secure a U.S. citizen or LPR father’s cooperation to establish her

child's right to U.S. citizenship, the E.O. provides abusers with a powerful tool of coercion and control, threatens both mother and child's continued safety, and in some cases risks statelessness where these fathers decline to cooperate.

D. The E.O. Would Strip the Children of LGBTQI Immigrants of the Right to Acquire U.S. Citizenship

The E.O. would make it difficult for many U.S.-born children of noncitizen LGBTQI parents or couples of mixed immigration status to obtain U.S. citizenship at birth. Importantly, the E.O. fails to define what criteria the government will use to determine who qualifies as a "biological progenitor." Exec. Order at § 4. Significantly, the E.O. does not clarify whether that term refers to genetic contribution, reproductive role, chromosomal classification, or some combination of these factors. *Id.*; see also U.S. Citizenship & Immigr. Servs., *USCIS Implementation Plan of Executive Order 14160* at 2 n. 3. By tying citizenship exclusively to the status of a child's "biological progenitors," the E.O. places LGBTQI immigrant families at heightened risk of having one parent excluded from recognition, thereby jeopardizing the child's citizenship despite the existence of a bona fide parent-child relationship.

The "biological progenitor" framework disproportionately harms non-birthing parents in same-sex immigrant or mixed status couples. One parent is necessarily a non-birthing parent. In many same-sex

couples, only one parent may be biologically related to the child, while the other, non-birthing, parent nevertheless serves as a legal as well as a social and caregiving parent. U.S. courts have recognized such children of same-sex parents as citizens. See *E. J. D.B. v. U.S. Dept. of State*, 825 F. App'x 479, 480 (9th Cir. 2020) (affirming that a child born abroad to two married men – conceived through assisted reproductive technology using the noncitizen father's sperm – was a U.S. citizen). By now conditioning a child's citizenship on the immigration or citizenship status of only the “immediate male” or “immediate female” biological progenitor, in addition to the other restrictions on acquisition of citizenship by children of immigrants discussed *supra*, the E.O. systematically disregards the parental status of non-birthing parents in same-sex couples. This framework places children born into same-sex families at risk of being denied citizenship based solely on their family's structure.

The E.O. would also create uncertainty for transgender parents and families formed through assisted reproduction, including in vitro fertilization (“IVF”) and surrogacy, which disproportionately harms LGBTQI immigrants. For instance, if a transgender man who is a citizen provided a surrogate – who is “unlawfully present” or in a “lawful but temporary” status – with his eggs to conceive a child using a foreign third-party's sperm, the child's citizenship status could be in doubt, even if the child were born on U.S. soil. This is because it is unclear whether the transgender man would be the “female biological progenitor,” despite being a genetic and legal parent to the child, since he would not be birthing the child.

Moreover, intersex⁸ individuals (whether or not they are immigrants) may have sex characteristic that do not fit within binary categories of “male” or “female.” However, the E.O. requires identification of an “immediate male” or “immediate female” biological progenitor in order for a child to qualify for citizenship. For example, an intersex man with Swyer syndrome⁹ who is a U.S. citizen in a mixed status family might give birth to a child in the U.S. via IVF using donated genetic material and his child might not be entitled to citizenship if the donated material comes from donors who were not citizens or LPRs, or whose status was unknown. Under the definitions in the E.O., it is unclear whether he would be the father or the mother of the child, or neither, despite giving birth to the child, because he is not a genetic progenitor of the child. Where an intersex parent cannot be clearly classified under either category, the E.O. effectively fails to recognize that parent at all for citizenship purposes.

8. “Intersex” refers to differences in specific sex traits (e.g., external genitalia, chromosomal karyotypes, and varied responsiveness to testosterone or estrogen) that people are born with or develop in childhood. OHCHR, *Intersex People: OHCHR and the Human Rights of LGBTI People*, <https://www.ohchr.org/en/sexual-orientation-and-gender-identity/intersex-people> ; Amnesty International, *Its Intersex Awareness Day – Here are 5 Myths we Need to Shatter* (Oct. 26, 2018) <https://www.amnesty.org/en/latest/news/2018/10/its-intersex-awareness-day-here-are-5-myths-we-need-to-shatter> (comparing prevalence of intersex traits – 1.7 percent – to that of red hair in the population).

9. A person with Swyer syndrome has the XY chromosomal karyotype (typically associated with males) but can sometimes not produce sperm or ova. Laura Krygere, et al., *Infertility management in a patient with Swyer syndrome: a case report*, 42 J. ASSIST. REPROD. GENET. 1689 (May 2025). People with Swyer syndrome often develop uteruses and may be capable of giving birth if they receive an egg via donation. See *id.* at 1690-91.

The E.O. thus harms immigrant LGBTQI families and would strip children of many of them of the right to acquire U.S. citizenship at birth, leaving them in a chaotic, uncertain and precarious legal status – and leaving some of them at risk of deportation to persecution or torture.

II. The Court Must Rule in a Manner Consistent with U.S. International Law Obligations and Strike Down the E.O.

The Court must strike down the E.O. to avoid breaches of U.S. international law obligations. Under the U.S. Constitution’s Supremacy Clause, treaties “shall be the supreme Law of the Land. . . .” U.S. Const. art. VI, cl. 2. International treaty obligations, as well as customary international law, have thus regularly guided this Court’s decisions. *The Paquete Habana*, 175 U.S. 677, 700 (1900) (“International law is part of our law, and must be ascertained and administered by the courts of justice”); accord *The Nereide*, 13 U.S. 388, 423 (1815) (Marshall, C. J.) (“[T]he Court is bound by the law of nations which is a part of the law of the land”). Regardless of their implementation through legislation or whether they provide a cause of action, then, treaties – even non-self-executing provisions of treaties – “bind the United States as a matter of international law,” *Sosa v. Alvarez-Machain*, 542 U.S. 692, 735 (2004), and this Court appropriately takes treaty obligations into account in interpreting federal law. See The Restatement (Fourth) of Foreign Relations Law § 310 n. 12 (2018) (“A treaty’s lack of judicial enforceability is not inconsistent with a status of ‘Law of the Land’ under the Supremacy Clause.”).¹⁰

10. Indeed, the executive branch should itself comply with applicable treaties in order to ensure it is taking care in order to

This Court has thus long applied domestic law in a manner consistent with U.S. treaty and customary international law obligations, to avoid putting the United States in breach of its international law obligations. *Murray v. Schooner Charming Betsy*, 6 U.S. (2 Cranch) 64, 118 (1804) (providing that “an act of Congress ought never to be construed to violate the law of nations if any other possible construction remains”); The Restatement (Third) of Foreign Relations Law § 114 (1987) (“Where fairly possible, a United States statute is to be construed so as not to conflict with international law or with an international agreement of the United States.”).

Upholding the E.O. would put the United States in breach of its international human rights obligations (A) to safeguard those fleeing persecution or torture from deportation, (B) to prevent statelessness, (C) to eliminate discrimination on the basis of sex in failures to protect survivors of domestic violence or abuse, and (D) to ensure the laws do not discriminate on the basis of sex, sexual orientation or gender identity.

A. Failure to Provide Access to Protection from Deportation to Persecution or Torture Would Violate International Law

The principle of non-refoulement prohibits deporting any individual, including an infant, to a territory where they face persecution or torture. The principle of non-refoulement is, first, enshrined in the 1951 Refugee

avoid putting the United States in breach of international law. U.S. Const. art. II, cl. 3; Edward Swaine, *Taking Care of Treaties*, 108 COLUM. L. REV. 331, 367 (2008)

Convention and made binding on the United States through its accession to the 1967 Protocol. Protocol Relating to the Status of Refugees, Jan. 31, 1967, 19 U.S.T. 6223, 606 U.N.T.S. 267; Convention relating to the Status of Refugees Art. 33, 189 U.N.T.S. 150, (July 28, 1951) (“1951 Convention”). Congress implemented this core protection through the mandatory “withholding of removal” statute, which provides that the Attorney General “may not remove” a noncitizen to a country where the person’s “life or freedom would be threatened” because of race, religion, nationality, political opinion, or membership in a particular social group. See 8 U.S.C. § 1231(b)(3)(A) (2024). The Supreme Court has noted that withholding of removal “mirrors” the Refugee Protocol. See *Immigr. & Naturalization Serv. v. Cardoza-Fonseca*, 480 U.S. 421, 424 (1987). Second, the duty is also reflected in other ratified instruments including the United Nations Convention Against Torture (“CAT”). Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment Art. 3, Dec. 10, 1984, 1465 U.N.T.S. 85. Congress directed rulemaking to implement CAT via the Foreign Affairs Reform and Restructuring Act, establishing that the U.S. government may not “expel, extradite, or otherwise effect the involuntary return of any person to a country in which there are substantial grounds for believing the person would be in danger of being subjected to torture.” Pub. L. 105-277, Div. G, § 2242(a), 112 Stat. 2681, 2681-822 (1998) (codified as statutory note to 8 U.S.C. § 1231).¹¹ Non-refoulement is

11. The treaty prohibits deportation to a risk of torture. U.N. Comm. Against Torture, *General Comment No. 4 on the Implementation of Article 3 of the Convention in the Context of Article 22*, U.N. Doc. CAT/C/GC/4, ¶10 (Sept. 4, 2018).

also protected by the International Covenant on Civil and Political Rights (“ICCPR”). International Covenant on Civil and Political Rights arts. 2, 6, 7, Dec. 16, 1966, 999 U.N.T.S. 171. Although Congress has not implemented the ICCPR by legislation, 138 Cong. Rec. S4781-01 (daily ed. Apr. 2, 1992), the Executive Branch has repeatedly assured the Senate that the U.S. could and would fulfill its treaty commitments by applying existing federal constitutional and statutory law in a manner commensurate with its treaty obligations. See ICCPR, S. Exec. Rep. No. 102-23, at 5, 19, 26-27 (1992). Federal courts have also construed federal statutes in the immigration context to avoid breach of the ICCPR. See, e.g., *Ma v. Ashcroft*, 257 F.3d 1095, 1114-15 (9th Cir. 2001) (construing 8 U.S.C. § 1231(a)(6) as requiring a reasonable time limitation on immigration detention to avoid breaching with ICCPR Art. 9).

Because non-refoulement is only meaningful if it is operationalized in practice, countries must maintain procedures that reliably identify those entitled to protection and ensure they receive it, thereby functioning as a concrete safeguard against refoulement. See UNHCR, *Note on the Principle of Non-Refoulement* (Nov. 1997). If parents fleeing persecution or torture are granted asylum or withholding or CAT protections, but their U.S.-born child is denied both U.S. citizenship and any status preventing deportation to harm, the child could face deportation and family separation. Failing to protect and instead increasing children’s exposure to risk of removal to harm is therefore in direct tension with this duty to prevent refoulement. Denying citizenship to children of asylum-seekers and those who the government knows face a fear of persecution or torture if deported, while leaving them without ready access to such protections, would violate international law.

B. Failure To Provide Children of Immigrants Genuine and Effective Opportunity to Acquire a Nationality Violates International Law

While human rights law does not require countries to grant citizenship to all who are born within their borders, it does restrict their ability to enact or enforce laws in a manner that would render children stateless. The ICCPR guarantees all children rights to special measures of protection and to acquire a nationality and guarantees to all people the right to recognition before the law. ICCPR arts. 16, 24(1), 24(3). The U.N. Human Rights Committee (“HRC”), a body of experts established by the ICCPR to supervise compliance with its provisions, has found that a country violates the treaty when it fails to provide a “genuine and effective” opportunity or avenue for a stateless child to acquire a nationality, thereby rendering them stateless or placing them at risk of statelessness. *D.Z. v. Netherlands*, U.N. Human Rights Comm., Commc’n No. 2918/2016; cf. *Daniel Fasliu, Marjeldo Rexha & Hajrije Rexha v. Albania*, U.N. Human Rights Comm., Commc’n No. 3602/2019, ¶ 3.3 (reviewing risks of statelessness of child born abroad). In reaching its conclusion in *D.Z.*, the HRC relied on its General Comment No. 17, emphasizing that the purpose of the treaty’s protection of the right to nationality is to ensure that children are not afforded lesser protection by society or the State, and that treaty parties are required to adopt all appropriate measures, domestically and internationally, to ensure that every child acquires a nationality at birth. Human Rights Comm., *General Comment No. 17: Article 24 (Rights of the Child)*, ¶ 8, U.N. Doc. HRI/GEN/1/Rev.1 (1989). U.S. law currently provides no avenue for children who would otherwise be rendered stateless by the E.O. to acquire U.S. citizenship. Stripping children born on U.S. soil of the

right to acquire U.S. citizenship, and instead rendering them stateless without alternative avenues by operation of the E.O. would violate international law.

C. Failure to Protect Survivors of Domestic Violence by Preventing their Children from Acquiring U.S. Citizenship Violates International Law

The ICCPR imposes an obligation on the United States to protect all people subject to its jurisdiction and control from discrimination on the basis of sex in the enjoyment of all human rights. ICCPR arts. 2(1), 3, 26. The HRC has found that citizenship laws that create barriers to the acquisition of nationality on the basis of sex are discriminatory. Cf. *Aumeeruddy-Cziffra et al. v. Mauritius*, U.N. Human Rights Comm., Commc’n No. R.9/35, U.N. Doc. Supp. No. 40 (A/36/40) at 134, ¶ 9.2(b)(2)(i)(8) (1981) (evaluating legal barriers to spousal acquisition of nationality). Other United Nations bodies have applied the same logic to laws preventing children from acquiring nationality on the basis of their parents’ sex. See, e.g., U.N. Comm. on the Elimination of Discrimination Against Women, *General Recommendation No. 32 on the Gender-Related Dimensions of Refugee Status, Asylum, Nationality and Statelessness of Women*, ¶¶ 48–50, U.N. Doc. CEDAW/C/GC/32 (2014); Report of the Special Rapporteur on violence against women and girls, its causes and consequences, U.N. Doc. A/78/256, ¶ 1 (2023) (finding that gender-discriminatory nationality laws “lead to statelessness and cause wide-ranging and multilayered forms of human rights violations, including sexual violence and gender-based violence.”).

Human rights bodies have also found that, because domestic violence disproportionately affects women and

can itself be a form of sex-based discrimination, failure to affirmatively protect people from domestic violence constitutes sex discrimination. *Lenahan (Gonzales) v. U.S.*, Case 12.626, Inter-Am. Comm'n H.R., Report No. 80/11, ¶ 5 (2011) (interpreting the American Declaration on the Rights and Duties of Man, Res. XXX, Final Act of the Ninth International Conference of American States (Pan American Union), Bogota, Colombia, Mar. 30-May 2, 1948, at 38, which has an equivalent prohibition of discrimination to the ICCPR at its Article II).

Just as international bodies have recognized that a state's failure to protect survivors of domestic violence constitutes a form of sex discrimination, failing to account for the discriminatory impact of the E.O. on domestic violence survivors and in particular their operation as a barrier to their children's ability to acquire citizenship, flouts these duties. State action that implements the E.O. in ways that undermine survivors' access to legal protections violates the ICCPR. Cf. Caroline Bettinger-López, Jamila Flomo & Amanda Suarez, *The Effects of Anti-Immigrant Laws in the U.S. on Victims of Domestic Violence, Sexual Assault, and Human Trafficking: A Gender-Based Human Rights Analysis*, 23 HARV. LATINX L. REV. 17, 20–25 (June 2020). The E.O. breaches the U.S. obligation to prevent sex discrimination under the ICCPR.

D. Systematic Deprivation of the Rights of Children of LGBTQI Immigrant Families to Acquire U.S. Citizenship Violates International Law

The ICCPR's prohibition on discrimination and guarantee of equality before the law and equal protection of the law has also been interpreted to include prohibitions on discrimination on the basis of sexual orientation and

gender identity, including transgender status, in addition to sex, and applied to the context of acquisition of nationality. ICCPR arts. 2(1), 26; *G. v. Australia*, U.N. Human Rights Comm., Comm'n No. 2172/2012, ¶¶ 6.6, 6.7, 7.12, U.N. Doc. CCPR/C/119/D/2172/2012 (2017); accord U.N. Off. High Comm'r for Hum. Rts., *Resolution 2005/45 on Human Rights and Arbitrary Deprivation of Nationality*, ¶ 2, U.N. Doc. E/CN.4/RES/2005/45 (2005). Where a child's nationality is denied or rendered uncertain because of a parent's sexual orientation or because a parent does not conform to binary biological norms, the resulting exclusion reflects precisely the type of status-based discrimination that human rights law forbids. Human Rights Comm., *General Comment No. 18: Non-Discrimination*, ¶ 7, U.N. Doc. HRI/GEN/1/Rev.1 at 26 (1994); see also The Int'l Comm'n of Jurists & The Int'l Serv. For Hum. Rts., *The Yogyakarta Principles: Principles on the Application of International Human Rights Law in Relation to Sexual Orientation and Gender Identity* (2007).

By conditioning a child's access to citizenship on their parents' conformity with binary sex classifications, the E.O. imposes unequal legal harms on similarly situated families based solely on the sex characteristics or legal classifications of a parent. For LGBTQI parents, whose bodies or legal identities may not align with the E.O.'s rigid definitions of "male" and "female," the framework creates a heightened risk that their parental status will be disregarded and their child stripped of the right to acquire U.S. citizenship as a result. There is no plausible legitimate justification for distinctions in permitting U.S. citizenship acquisition at birth based on parentage or caregiving. The E.O.'s reliance on biological assumptions that disproportionately burden LGBTQI immigrant families therefore violates these obligations.

* * *

Allowing the E.O. to take effect would resurrect the very legal caste system the Fourteenth Amendment was designed to abolish – creating a shadow population of especially vulnerable immigrants denied the protection of the state. Cf. *Plyler v. Doe*, 457 U.S. 202, 218, 218 n. 17 (1982). The Court should reaffirm the settled principle of birthright citizenship and hold that no executive action may override the guarantees of the Fourteenth Amendment, nor the statutory protections enacted by Congress. Such a holding would avoid putting the United States in breach of its international law obligations.

CONCLUSION

The District Court’s judgment should be affirmed.

Respectfully submitted,

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APPENDIX

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ANNEX I

List of Amici (in alphabetical order)

The Acacia Center for Justice

Advocates for Trans Equality Education Fund

Al Otro Lado

The Alaíde Foppa Legal Clinic for Refugees

Alianza Nacional de Campesinas

American Immigration Lawyers Association

Americans for Immigrant Justice

ASISTA Immigration Assistance

Asylum Access

Battered Women's Justice Project

The Center for Constitutional Rights

The Center for Gender & Refugee Studies

The Center for Human Rights and Constitutional Law

Central West Justice Center

Appendix A

Clínica Jurídica Universidad Alberto Hurtado

Corporación Opción Legal

Dominican Development Center, Inc.

Esperanza United

Familia: Trans Queer Liberation Movement

Florence Immigrant and Refugee Rights Project

The Global Movement Against Statelessness

The Global Strategic Litigation Council¹

Grannies Respond / Abuelas Responden

Human Rights First

Immigrant Defenders Law Center

Immigrant Legal Resource Center

Innovation Law Lab

The Institute on Statelessness and Inclusion

1. Positions taken by the Council do not necessarily represent those of every member of its broader coalition, unless they also appear here as amicus.

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Appendix A

Instituto para las Mujeres en la Migración

Joint Action Committee for Refugees, Pakistan

Just Solutions

Justice Center of Southeast Massachusetts

Justice and Joy National Collaborative

Kituo Cha Sheria-Legal Advice Centre

Legal Momentum, the Women's Legal Defense & Education Fund

The Los Angeles LGBT Center

National Council of Jewish Women

National Immigrant Justice Center

National Organization for Women

The New York City Anti-Violence Project

The Northeastern University School of Law Domestic Violence Clinic

Oasis Legal Services

Save My Identity

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Appendix A

The Survivor Justice Center

The Tahirih Justice Center

Tompkins County Immigrant Rights Coalition

**Ujima, The National Center on Violence Against
Women in the Black Community**

United Refugees Foundation

United Stateless

The Women's Refugee Commission

The Zambian Civil Liberties Union