

No. 26-208

IN THE
Supreme Court of the United States

GEORGE ANIBOWEI,
Petitioner,

v.

TODD BLANCHE, ATTORNEY GENERAL, ET AL.,
Respondents.

ON PETITION FOR A WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS FOR THE FIFTH
CIRCUIT

BRIEF OF *AMICUS CURIAE* THE HAITIAN
BRIDGE ALLIANCE IN SUPPORT OF
PETITIONER

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INTEREST OF *AMICUS CURIAE*¹

Amicus curiae the Haitian Bridge Alliance (“HBA”) is a 501(c)(3) non-profit organization that provides migrants and immigrants with humanitarian, legal, and social services. HBA was incorporated in California in early 2016 to address the needs of an influx of Haitian and other Black immigrants seeking humanitarian protections in the United States as conditions in their countries deteriorated. This work includes helping their clients pursue immigration status, providing humanitarian services, and administering a welcoming program to assist with transitional needs.

Since 2020, HBA has operated a legal department with a small staff of attorneys who provide direct representation to Haitian and other Black people in United States immigration matters, including people in Immigration and Customs Enforcement detention, those in removal proceedings before the Executive Office for Immigration Review, and those filing applications for immigration benefits with U.S. Citizenship and Immigration Services. More recently, HBA has engaged in affirmative federal litigation challenging immigration-related policies, including cases brought under the Administrative Procedure Act and the Fifth Amendment, as well as *habeas*

¹ Pursuant to Rule 37.6, *amicus curiae* affirms that no counsel for any party authored this brief in whole or in part, and that no entity or person, other than the *amicus* and its counsel, made any monetary contribution intended to fund the preparation or submission of this brief. Pursuant to Rule 37.2, all parties were timely notified of the *amicus*’s intent to file this brief.

corpus, Freedom of Information Act and Federal Tort Claims Act litigation. In connection with both its litigation and advocacy work, HBA routinely opposes Executive Branch actions and travels to the border to work with clients and investigate human rights abuses abroad, including in Mexico and Haiti.

HBA has a strong interest in ensuring that it can provide effective legal assistance and humanitarian aid to clients without fearing compelled disclosure of sensitive data to its litigation adversary or chilled associational rights. HBA respectfully files this brief in support of Petitioner, urging the Court to grant certiorari and reverse.

SUMMARY OF ARGUMENT

I. The Court should grant certiorari in view of the critical Fourth Amendment issues at stake. The “border exception” to the Fourth Amendment’s general warrant requirement does not extend to searches of electronic devices. The Court has recognized that such devices facilitate access to vast amounts of data, embracing all aspects of a person’s life, stored elsewhere. Such searches, and even the prospect of them, chill the ability of organizations such as *amicus* and the persons with whom they work and interact, to communicate freely and willingly. The Court should grant review to address this critical problem.

II. There is also a First Amendment right at stake here, that should yield certiorari as well. The Court

has recently, and unanimously, stressed that this right “carr[ies] special significance for political, social, religious and other minorities[,]” groups that include those with whom *amicus* works. Compelled disclosure to the government, let alone the public, may curtail the freedom to associate. The Court should grant review to address and vindicate this important right.

ARGUMENT

I. THE PETITION SHOULD BE GRANTED BECAUSE WARRANTLESS ELECTRONIC DEVICE SEARCHES VIOLATE THE FOURTH AMENDMENT

Searches at the border are exempted from the Fourth Amendment’s warrant requirement “pursuant to the long-standing right of the sovereign to protect itself by stopping and examining persons and property crossing into this country[.]” *United States v. Ramsey*, 431 U.S. 606, 616 (1977). Based on the immigration and customs-enforcement rationales animating the border exception, agents may engage in stops, searches, and examinations of people who cross the border, as well as the vessels and physical effects that enter the country. *See, e.g., United States v. Flores-Montano*, 541 U.S. 149 (2004) (fuel tank); *United States v. Montoya de Hernandez*, 473 U.S. 531 (1985) (routine customs search of person; reasonable suspicion of smuggling required for search of alimentary canal); *United States v. Villamonte-Marquez*, 462 U.S. 579 (1983) (ships); *Ramsey*, 431 U.S. 606 (international mail); *United States v. Thirty-seven Photographs*, 402 U.S. 363, 376 (1971) (luggage).

But the right of the government to control who and what enters the country, at the point of entry, can extend no further. The border exception authorizes the government to search physical effects present there, at its border; it does not entitle the government to extend its search into the traveler’s “digital record of more information than could likely be found through a thorough search of that person’s home, car, office, mail, and phone, financial and medical records[.]” *United States v. Smith*, 673 F.Supp.3d 381, 395 (S.D.N.Y. 2023). The fact that a traveler has his key in his pocket does not entitle an agent to go to his home and search there. This is as true at the border as it is incident to an arrest.

A. Electronic Devices Enable Access to Exponentially More Sensitive Information Than the Border Exception Justifies.

In both a quantitative and qualitative sense, electronic devices like cell phones are an entirely different category of “effects” than the physical items exempted from the warrant requirement when inspected to enforce customs and immigration laws. Qualitatively, they “collect[] in one place many distinct types of information—an address, a note, a prescription, a bank statement, a video—that reveal much more in combination than any isolated record.” *Riley v. California*, 573 U.S. 373, 394 (2014). Quantitatively, cell phones are physical objects that not only have “immense storage capacity” themselves,

id. at 393, but also the capacity to access vast amounts of data stored elsewhere. *Riley*, 573 U.S. at 397.²

Via its connection to the Internet, a cell phone may be able to access the owner's current and historical health metrics,³ location history,⁴ or a live stream of her sleeping child on a baby monitor in her home.⁵ For travelers who use their electronic devices for work, a cell phone may be able to access their employers' network- or cloud-based files containing information about its internal operations, customers, or personnel.⁶

Importantly, border agents searching a device's data do not typically have any way of knowing whether the information is contained locally on the device or accessed from the cloud, unless a device's data and network connections are disabled. *Riley*, 573 U.S. at 397. According to the only available Department of Homeland Security Office of Inspector General audits, border agents do not consistently disable these connections.⁷

² See, e.g., Amazon Web Servs., *What is Mobile Cloud Computing?*, <https://perma.cc/LS4A-GJC9>.

³ See, e.g., Samsung, *Samsung Health*, <https://perma.cc/2FSH-RYXB>.

⁴ See, e.g., Apple, *iPhone User Guide, View and Manage Visited Places in Maps on iPhone*, <https://perma.cc/4NZR-BZ2Q>.

⁵ See, e.g., Nanit, *All-in-One Parenting App*, <https://perma.cc/3JQ6-BP8S>.

⁶ See, e.g., Microsoft, *Microsoft One Drive: AI-Powered File Storage and Cloud Sharing for Work*, <https://perma.cc/U62W-MVP7>.

⁷ U.S. Dep't of Homeland Sec., Office of the Inspector General, *CBP's Searches of Electronic Devices at Ports of Entry – Redacted 6-7* (Dec. 3, 2018), <https://perma.cc/76N3-TJYK>; U.S.

**B. The Risk of Data Searches and Seizures
at the Border Burdens HBA’s Legal and
Humanitarian Work.**

As noted above, HBA represents Haitian and other Black people in immigration matters in this country, including people in ICE detention and/or in removal proceedings. In addition, HBA has affirmatively opposed Executive Branch actions in suits challenging the use of public health orders to expel migrants seeking asylum,⁸ and seeking records from the Department of Homeland Security (“DHS”) concerning the treatment and expulsion of Haitian migrants at the Del Rio encampment.⁹ Finally, HBA engages in local, state, national, and international advocacy for fair and humane immigration policies and pathways. In connection with this work, its staff travel abroad to investigate and report on issues impacting migrants, including sexual and gender-based violence.¹⁰

For HBA and organizations like it, electronic devices are critical tools that facilitate this work. They contain communications with, and intimate information about, their clients, the members of the communities they serve, and their challenges to

Dep’t of Homeland Sec., Office of the Inspector General, *CBP Continues to Experience Challenges Managing Searches of Electronic Devices at Ports of entry (REDACTED)* 10-12 (Sept. 23, 2021), <https://perma.cc/JR6X-D3NE>.

⁸ *Haitian Bridge All. v. Biden*, No. 1:21-CV-03317, (D.D.C. Dec. 20, 2021).

⁹ *Haitian Bridge All. v. United States Dep’t of Homeland Sec.*, No. 22-cv-8344 (S.D.N.Y. Sept. 30, 2022)

¹⁰ <https://perma.cc/635T-62ZR>; <https://perma.cc/QPC2-MTQC>

Executive action targeting Haitians and other minority populations.

In the case of HBA’s research on sexual and gender-based violence experienced by migrants traveling through the Darien Gap, for instance, staff’s electronic devices included interviews with migrants recounting being raped and witnessing gang members kill family members.¹¹ In other cases, HBA staff entered Mexico and traveled back into Texas on a regular basis to investigate multiple lawsuits challenging the Trump administration’s denial of access to asylum at the border.¹² While in Mexico, they collected information about potential clients’ medical conditions and other aspects of their potential claims, and their passport information, all of which was stored on electronic devices (some of which were HBA-issued) as they re-entered the U.S. This information is plainly “inherently privileged or otherwise confidential.”¹³

The harm of warrantless data searches and seizures to immigration attorneys and others engaged in litigation against the government—and their clients—is also significant because it entails a disclosure of privileged and confidential material to a litigation adversary. Like the Petitioner here, the plaintiff in *Malik v. United States Dep’t of Homeland*

¹¹ <https://perma.cc/4BJW-6XUY>

¹² <https://perma.cc/S64A-FZRX>; *Al Otro Lado, Inc. v. Trump*, Case No. 25-cv-01501 (S.D. Cal. June 11, 2025).

¹³ Letter from Linda A. Klein, President, Am. Bar Ass’n, to John F. Kelly, Sec’y, U.S. Dep’t of Homeland Sec., & Joseph B. Maher, Acting Gen. Counsel, U.S. Dep’t of Homeland Sec. (May 5, 2017), AILA Doc. No. 17051062, <https://perma.cc/NB8G-EH5W>.

Security, 78 F.4th 191 (5th Cir. 2023), was an immigration attorney who represented clients who “often litigate opposite DHS.”¹⁴ Accordingly, DHS’s ongoing possession of data from his phone that he “specifically identified [as] work-product privileged materials” was an ongoing injury-in-fact. *Id.* at 199.

Humanitarian workers have likewise been subjected to warrantless device searches at the border. In one instance, an NGO volunteer was detained for two hours at the San Ysidro border while his phone was subject to a “basic search”; two days later, he was detained again, this time for five hours, while his phone was subjected to an “advanced search.” The agents acknowledged that they were aware of him crossing the border “for humanitarian reasons,” but nevertheless subjected him to repeated secondary inspections the next four times he crossed the border.¹⁵ More recently, a group of individuals returning from delivering medicine, food, and other supplies in Cuba was subjected to warrantless device searches upon their re-entry into the United States.¹⁶

¹⁴ *Id.* at 194 (“Adam Malik is an attorney who practices immigration law . . . [he] uses a passcode-protected smartphone to communicate with his clients via email, and to take notes, record conversations, access files, and otherwise manage his cases. Much of this data is privileged.”).

¹⁵ Amnesty Int’l, *‘Saving Lives is Not a Crime:’ Politically Motivated Legal Harassment Against Migrant Human Rights Defenders by the USA* 22-23 (2019), <https://perma.cc/M9GU-E8NM>.

¹⁶ Claire Heddles, *Cuba Aid Envoy Participants Say They Were Detained, Questioned at MIA*, Miami Herald (Mar. 29, 2026), <https://perma.cc/W4NU-4KE3>.

The cell phones, tablets, laptops, and Kindles of at least 18 travelers were seized.¹⁷

For immigration-law practitioners and humanitarian aid workers alike, these warrantless border searches have the effect, if not the intent, of retaliation, harassment, and intimidation.¹⁸ For the people they serve, the specter of their attorneys or aid-worker contacts undergoing warrantless border searches and seizures risks chilling their willingness to communicate candidly.¹⁹ This concern is acute for all immigrants in light of the President's remarks about them²⁰; it is all the more so for Haitian migrants in particular, who have been singled out for the most vitriolic remarks by President Trump and Vice President Vance.²¹

¹⁷ David Montgomery, *Solidarity Under Siege*, The Nation (Apr. 2, 2026), <https://perma.cc/U9B4-VAAY>.

¹⁸ *Id.*; see also Oscar Margain, *Immigration Attorney Sues Trump Administration After Phone Seized at Logan*, NBC Boston (Oct. 21, 2025), <https://perma.cc/JVF7-9GAU>; Jack Spinggate, *Dearborn Attorney Representing Pro-Palestinian Protester Says He Was Detained, Questioned at Airport*, CBS News Detroit (Apr. 8, 2025), <https://perma.cc/F6P7-T5VQ>.

¹⁹ See, e.g., *Grubbs v. O'Neill*, 744 F.App'x 20, 23 (2d Cir. 2018) (camera's presence in attorney-client booths chills right to communicate candidly with attorneys under Sixth Amendment) (citing *Wolff v. McDonnell*, 418 U.S. 539, 577 (1974)).

²⁰ See, e.g., Alexandra Marquez, *Trump Revives Slur While Discussing Immigrants from Somalia and Other 'Disgusting' Nations*, NBC News (Dec. 10, 2025), <https://perma.cc/49LC-JQYZ>; Nathan Layne et al., *Trump Calls Migrants 'Animals,' Intensifying Focus on Illegal Immigration*, Reuters (Apr. 3, 2024), <https://perma.cc/L3JU-XW4K>.

²¹ See, e.g., Michael D. Shear, *Trump's Derision of Haitians Goes Back Years*, N.Y. Times, (Sept. 18, 2024), <https://perma.cc/XCA9-75HX>; Luke Garrett, *Vance Defends*

HBA should not be forced to choose between providing effective assistance to migrants and disclosing their private data to adversaries. The Court should grant review and apply *Riley* to device searches at the border.

II. WARRANTLESS DATA SEARCHES AND SEIZURES AT THE BORDER CHILL THE FREEDOM OF ASSOCIATION

As detailed above, the Fourth Amendment concerns in this case are fundamental ones. These concerns alone should yield a grant of certiorari. But the First Amendment rights at stake are equally important and are an independent basis for review as well. The First Amendment protects the “right to associate with others in pursuit of a wide variety of political, social, economic, educational, religious, and cultural ends.” *Roberts v. United States Jaycees*, 468 U.S. 609, 622 (1984). As this Court recently unanimously stressed, these “[a]ssociational rights carry special significance for political, social, religious, and other minorities.” *First Choice Women’s Res. Ctrs., Inc. v. Davenport*, 608 U.S. 174, 184 (2026). “[C]ompelled disclosure of affiliation with groups engaged in advocacy” can chill the exercise of freedom of association wherever it occurs. *Id.* at 185 (quoting *NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449, 462 (1958)) (internal quotation omitted). That the disclosure may be compelled only to the government, and not to the public, is immaterial, since it nevertheless “*may* have the effect of curtailing the freedom to associate[.]” *Americans for Prosperity*

Spreading Claims that Haitian Migrants Are Eating Pets, NPR (Sept. 15, 2024), <https://perma.cc/P8DL-HTW6>.

Foundation v. Bonta, 594 U.S. 595, 616 (2021) (“*AFP*”) (quoting *NAACP*, 357 U.S. at 460-61) (emphasis in original).

The private nature of the data contained on electronic devices raises obvious First Amendment concerns. And the sheer quantity and types of information contained on a traveler’s device may reveal far more information to the government than the donor and membership records at issue in *First Choice*, *AFP*, and *Patterson*.

Furthermore, warrantless data searches and seizures at the border have long been used as a predicate to probe American travelers’ political beliefs, religious practices, and associational ties.²² For example, Muslim American travelers describe agents detaining them upon their return from international travel to search their phones and ask about their religious beliefs;²³ to review each file on their laptops and inquire about association with religious organizations;²⁴ to review their cell phones and digital cameras and ask about their views of

²² See, e.g., Muslim Advocates, *Unreasonable Intrusions: Investigating the Politics, Faith, & Finances of Americans Returning Home* (Apr. 2009), <https://perma.cc/9ZL8-4GZ8> (Hereinafter “Unreasonable Intrusions”); Asian Law Caucus and Stanford Law School Immigrants’ Rights Clinic, *Returning Home: How U.S. Government Practices Undermine Civil Rights at Our Nation’s Doorstep* (Apr. 2009), <https://perma.cc/7G8P-Q4GN>; see also Charlie Savage, *U.S. Government Went Through These People’s Phones at the Border. Read Their Stories*, N.Y. Times (Dec. 22, 2017), <https://perma.cc/5AJC-LDD6>.

²³ Associated Press, *3 US Muslims Sue Over Religious Questioning by Officers* (Mar. 24, 2022), <https://perma.cc/UR8L-P2HR>.

²⁴ *Unreasonable Intrusions*, *supra* note 22, at 21-22.

foreign political leaders;²⁵ and to copy contact information from their phones while asking about their religious beliefs, organizations they are associated with, and feelings about America.²⁶

For immigration and advocacy organizations like HBA, warrantless data searches risk revealing sensitive information about the organization's clients, membership, and donors alike. This Court's First Amendment precedent clearly protects this same information from government demands within the United States. *First Choice Women's Res. Ctrs., Inc.*, 608 U.S. at 189-90; *Americans for Prosperity Foundation v. Bonta*, 594 U.S. at 616-17; *Buckley v. Valeo*, 424 U.S. 1, 64 (1976); *Gibson v. Fla. Legislative Investigation Comm.*, 372 U.S. 539, 543-44 (1963); *Shelton v. Tucker*, 364 U.S. 479, 485-86 (1960); *Bates v. City of Little Rock*, 361 U.S. 516, 522-23 (1960); *NAACP*, 357 U.S. at 460-61. It should apply to the border, too. This concern is an independent basis for review.

CONCLUSION

For the foregoing reasons, *Amicus* respectfully requests that the Court grant a petition for a writ of certiorari.

²⁵ *Id.* at 40.

²⁶ *Id.* at 19.

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