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Hon. Rosanna Malouf Peterson

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
AT RICHLAND

STATE OF WASHINGTON;
COMMONWEALTH OF VIRGINIA;
STATE OF COLORADO; STATE OF
DELAWARE; STATE OF ILLINOIS;
STATE OF MARYLAND;
COMMONWEALTH OF
MASSACHUSETTS; ATTORNEY
GENERAL DANA NESSEL ON
BEHALF OF THE PEOPLE OF
MICHIGAN; STATE OF MINNESOTA;
STATE OF NEVADA; STATE OF
NEW JERSEY; STATE OF NEW
MEXICO; and STATE OF RHODE
ISLAND.

Plaintiffs,

V.

UNITED STATES DEPARTMENT
OF HOMELAND SECURITY, a
federal agency; KEVIN K.

No. 4:19-cv-05210

MOTION FOR LEAVE TO
FILE BRIEF OF AMICI
CURIAE NONPROFIT ANTI-
DOMESTIC VIOLENCE AND
SEXUAL ASSAULT
ORGANIZATIONS IN
SUPPORT OF PLAINTIFFS'
MOTION FOR
PRELIMINARY INJUNCTION

10/03/2019
Without Oral Argument

McALEENAN, in his official capacity as Acting Secretary of the United States Department of Homeland Security; UNITED STATES CITIZENSHIP AND IMMIGRATION SERVICES, a federal agency; KENNETH T. CUCCINELLI II,
in his official capacity as Acting Director
of United States Citizenship and Immigration Services,

Defendant.

I. INTRODUCTION

Amici National Alliance to End Sexual Violence, National Coalition Against Domestic Violence, National Network to End Domestic Violence, National Resource Center on Domestic Violence, National Domestic Violence Hotline, API Chaya, Battered Women's Justice Project ,Sexual Violence Law Center, ASISTA Immigration Assistance, Asian Pacific Institute on Gender-Based Violence, Futures Without Violence, Legal Momentum, The Women's Legal Defense and Education Fund , Tahirih Justice Center, Arizona Coalition to End Sexual and Domestic Violence, End Domestic Abuse Wisconsin: The Wisconsin Coalition Against Domestic Violence, Violence Free Colorado, Washington State Coalition Against Domestic Violence, Kansas Coalition Against Sexual and Domestic Violence, Maine Coalition to End Domestic

1 Violence, Iowa Coalition Against Domestic Violence, Montana Coalition Against
2 Domestic and Sexual Violence, Vermont Network Against Domestic and Sexual
3 Violence, SC Coalition Against Domestic Violence and Sexual Assault, Texas
4 Council on Family Violence, Ohio Domestic Violence Network, Idaho Coalition
5 Against Sexual & Domestic Violence, Jane Doe Inc., The Massachusetts
6 Coalition Against Sexual Assault and Domestic Violence, Illinois Accountability
7 Initiative, The North Carolina Coalition Against Domestic Violence, Nebraska
8 Coalition to End Sexual and Domestic Violence, Kentucky Coalition Against
9 Domestic Violence, DCADV, National Council of Jewish Women, Illinois
10 Coalition Against Domestic Violence, Rhode Island Coalition Against Domestic
11 Violence, Nevada Coalition to End Domestic and Sexual Violence, Mississippi
12 Coalition Against Domestic Violence, Legal Voice, New Jersey Coalition to End
13 Domestic Violence, Casa de Esperanza: National Latin@ Network for Healthy
14 Families and Communities, DC Coalition Against Domestic Violence, Ujima,
15 Inc.; The National Center on Violence Against Women in the Black Community,
16 and Washington Coalition of Sexual Assault Programs (collectively, “Amici”)
17 respectfully move for leave to file an amici curiae brief (the “Motion”) in support
18 of Plaintiffs’ motion for a preliminary injunction. *See* ECF No. 34. Plaintiffs do
19 not object to this Motion. Amici were unable to ask Defendants for their consent
20

1 because Defendants have not yet appeared in this case. Amici's proposed brief is
2 attached to this Motion.

3 **II. IDENTITY AND INTERESTS OF AMICI CURIAE**

4 Amici are state and national organizations advocating for and providing
5 direct services to victims of domestic violence, sexual assault, and trafficking.
6 Amici have an interest in ensuring that the victims they serve can access the public
7 benefits to which they are entitled under state and federal law and are not
8 penalized for the abuse they have endured.

9 The National Coalition Against Domestic Violence ("NCADV") provides
10 a voice to victims and survivors of domestic violence. It strives to foster a society
11 in which there is zero tolerance for domestic violence by influencing public
12 policy, increasing public awareness of the impact of domestic violence, and
13 providing programs and education that drive that change.

14 The National Resource Center on Domestic Violence ("NRCDV") was
15 established in 1993 as a federally funded resource center to provide
16 comprehensive technical assistance, training, and resource development related to
17 domestic violence intervention and prevention, community education and
18 organizing, and public policy and systems advocacy. The NRCDV has significant
19 expertise in strengthening survivors' access to economic resources and social

1 safety net benefits. Immigrant survivors are some of the most vulnerable to
2 economic instability and rely on social safety net programs to survive.

3 The National Alliance to End Sexual Violence is the voice in Washington
4 for the 56 state and territorial sexual assault coalitions and over 1500 rape crisis
5 centers working in their communities to address and end sexual violence. The
6 programs in our network see the widespread and devastating impacts of sexual
7 violence on survivors every day--especially those who are more vulnerable like
8 immigrant survivors. We oppose efforts to make it more difficult for immigrant
9 survivors to seek safety and justice.

10 The National Network to End Domestic Violence (“NNEDV”) is a not-for-
11 profit organization incorporated in the District of Columbia in 1994 to end
12 domestic violence. As a network of the 56 state and territorial domestic violence
13 and dual domestic violence and sexual assault coalitions and their over 2,000
14 member programs, NNEDV serves as the national voice for millions of women,
15 children, and men victimized by domestic violence. NNEDV works with federal,
16 state and local policy makers and domestic violence advocates to secure and
17 implement increased protections in the Violence Against Women Act and related
18 federal legislation. NNEDV supports legislation that protects immigrant domestic
19 and sexual violence survivors and provides pathways for survivors to obtain
20 immigration status. NNEDV is deeply concerned with survivor safety, including

1 the vital role that access to resources plays in their ability to escape and rebuild
2 their lives after abuse.

3 The National Domestic Violence Hotline (“NDVH”) was established in
4 1996 as part of the Violence Against Women Act. It operates a free, anonymous
5 and confidential, 24/7 hotline available via phone, text, and chat services to offer
6 victims of domestic violence compassionate support, crisis intervention, safety
7 planning, and referral services to enable them to find safety and live lives free of
8 abuse. A substantial number of victims NDVH serves are immigrants or those
9 who request help related to immigration-related issues. From May 2015 through
10 March 2017, for example, over 10,000 victims contacted NDVH identifying as
11 immigrants, and over 6,500 of them sought help related to immigration concerns.

12 Futures Without Violence (“FUTURES”), is a national nonprofit
13 organization that has worked for over thirty years to prevent and end violence
14 against women and children around the world. FUTURES mobilizes concerned
15 individuals; children’s, women’s, and civil rights groups; allied professionals; and
16 other social justice organizations to end violence through public education and
17 prevention campaigns, public policy reform, training and technical assistance, and
18 programming designed to support better outcomes for women and children
19 experiencing or exposed to violence. FUTURES joins with the other amici
20 because it has a long-standing commitment to supporting the rights and interests

1 of women and children who are victims of violence regardless of their
2 immigration, citizenship, or residency status. FUTURES co-founded and co-
3 chaired the National Network to End Violence Against Immigrant Women
4 working to help service providers, survivors, law enforcement, and judges
5 understand how best to work collaboratively to bring justice and safety to
6 immigrant victims of violence. Using this knowledge, FUTURES helped draft
7 legislative recommendations that were ultimately included in the Violence
8 Against Women Act and the Trafficking Victims Protection Act to assist
9 immigrant victims of violence. FUTURES co-chairs the Coalition to End
10 Violence Against Women and Girls Globally, partnering with other national
11 organizations to reduce sexual and domestic violence against women and
12 children.

13 The Asian Pacific Institute on Gender-Based Violence (the “Institute”) is a
14 national resource center on domestic violence, sexual assault, human trafficking,
15 and other forms of gender-based violence in Asian and Pacific Islander and in
16 immigrant communities. The Institute serves a national network of advocates and
17 community-based service programs that work with Asian and Pacific Islander and
18 immigrant and refugee survivors of domestic violence, sexual assault, and human
19 trafficking, and provides analysis and consultation on critical issues facing victims
20 of gender-based violence in the Asian and Pacific Islander and in immigrant and

1 refugee communities, including training and technical assistance on
2 implementation of the Violence Against Women Act and protections for
3 immigrant and refugee survivors. The Institute leads by promoting culturally
4 relevant intervention and prevention, expert consultation, technical assistance and
5 training; conducting and disseminating critical research; and informing public
6 policy.

7 ASISTA Immigration Assistance (“ASISTA”) worked with Congress to
8 create and expand routes to secure immigration status for survivors of domestic
9 violence, sexual assault, and other crimes. ASISTA serves as liaison for the field
10 with Department of Homeland Security personnel charged with implementing the
11 resulting laws. ASISTA also trains and provides technical support to local law-
12 enforcement officials, judges, domestic violence and sexual assault advocates,
13 and attorneys working with immigrant crime survivors. ASISTA has previously
14 filed amicus briefs with the Supreme Court of the United States, this Court, and
15 four other courts of appeals.

16 The Tahirih Justice Center is the largest multi-city direct services and
17 policy advocacy organization specializing in assisting immigrant women and girls
18 who survive gender-based violence. In five cities across the country, Tahirih
19 offers legal and social services to women and girls fleeing all forms of gender-
20 based violence, including human trafficking, forced labor, domestic violence, rape

1 and sexual assault, and female genital cutting/mutilation. Since its beginning in
2 1997, Tahirih has provided free legal assistance to more than 25,000 individuals,
3 many of whom have experienced the significant psychological and
4 neurobiological effects of that trauma. Through direct legal and social services,
5 policy advocacy, and training and education, Tahirih protects immigrant women
6 and girls and promotes a world where they can live in safety and dignity. Tahirih
7 amicus briefs have been accepted in numerous federal courts across the country.

8 The National Council of Jewish Women (“NCJW”) is a grassroots
9 organization of 90,000 volunteers and advocates who turn progressive ideals into
10 action. Inspired by Jewish values, NCJW strives for social justice by improving
11 the quality of life for women, children, and families and by safeguarding
12 individual rights and freedoms. NCJW’s Resolutions state that NCJW resolves
13 to work for laws, policies, programs and services that protect every woman from
14 all forms of abuse, exploitation, harassment, discrimination and violence, as well
15 as comprehensive, humane, and equitable immigration, refugee, asylum, and
16 naturalization laws, policies, and practices that facilitate and expedite legal status
17 and a path to citizenship for more individuals.

18 Legal Voice is a nonprofit public interest organization in the Pacific
19 Northwest that works to advance the legal rights of women, girls, and LGBTQ
20 people through litigation, legislative advocacy, and public education. Since its

1 founding in 1978 as the Northwest Women's Law Center, Legal Voice has long
2 advocated on behalf of all survivors of domestic violence, sexual assault, and
3 other forms of gender-based violence to ensure equal access to protections and
4 services. Legal Voice has participated as counsel and amicus curiae in numerous
5 cases throughout the Northwest and the country and serves as a regional expert
6 and advocate in the area of gender-based violence.

7 Legal Momentum, the Women's Legal Defense and Education Fund, is a
8 leading national non-profit civil rights organization, which for nearly 50 years has
9 used the power of the law to define and defend the rights of women and girls. As
10 one of the leading advocates for the Violence Against Women Act and its
11 subsequent reauthorizations, Legal Momentum has long advocated for and
12 secured legal protections for victims of domestic violence, sexual assault, and
13 human trafficking. Legal Momentum has worked for decades to ensure that all
14 women are treated fairly on issues of economic opportunity, regardless of their
15 gender or socioeconomic status, and it has pioneered critical programs to tackle
16 gender-based poverty and to advance the rights of immigrant women.

17 The mission of The National Center on Violence Against Women in the
18 Black Community, also known as Ujima, is to mobilize the community to respond
19 to and end domestic, sexual and community violence in the Black community.
20 We actualize this through research, public awareness and community

1 engagement, and resource development. It is with this informed experience that
2 we believe that the Public Charge rule will negatively impact survivors of
3 domestic violence who are experiencing trauma and oppression. Survivors
4 already face many social and economic consequences once they escape an abusive
5 relationship.

6 API Chaya is a non-profit organization in Seattle which empowers
7 survivors of gender-based violence and human trafficking in the Pacific
8 Northwest to gain safety, connection, and wellness. API Chaya builds power by
9 educating and mobilizing South Asian, Asian, Pacific Islander, and all immigrant
10 communities to end exploitation, and works to create a world where all people
11 can heal and thrive.

12 The Battered Women's Justice Project is a national technical assistance
13 center that provides training and resources for advocates, battered women, legal
14 system personnel, policymakers, and others engaged in the justice system
15 response to intimate partner violence (IPV). The BWJP promotes systemic
16 change within the civil and criminal justice systems to ensure an effective and just
17 response to victims and perpetrators of IPV, and the children exposed to this
18 violence. The BWJP is an affiliated member of the Domestic Violence Resource
19 Network, a group of national resource centers funded by the Department of Health
20 and Human Services and other support since 1993. The BWJP also serves as a

1 designated technical assistance provider for the Office on Violence Against
2 Women of the U.S. Department of Justice. In an effort to promote more safe and
3 just results for women and their children, the BWJP works at state, national and
4 international levels to engage court systems in methods of accurately assessing
5 the effects of IPV on women and children and to fashion safe outcomes that hold
6 batterers accountable.

7 The Sexual Violence Law Center (“SVLC”) is a non-profit legal services
8 organization that protects the privacy, safety, and civil rights of survivors of
9 sexual violence through trauma-informed, holistic, survivor-centered legal
10 advocacy. Where 1 in 3 women and 1 in 6 men will experience sexual violence
11 in their lifetime, SVLC responds to the legal needs of sexual assault victims of
12 Washington State who do not qualify for DV (intimate partner violence) services.
13 SVLC attorneys provide legal representation and assistance on a full range of
14 legal issues as a result of a sexual assault, including protection orders, housing,
15 employment, public benefits and immigration. On average, SVLC will represent
16 a victim in 4-6 legal areas. SVLS is deeply interested as amicus curiae as nearly
17 all of the victims the program serves are low-income and nearly one third are
18 receiving representation in immigration matters, including asylum, U-visas, T-
19 visa and VAWA petitions.

1 The Washington Coalition of Sexual Assault Programs (“WCSAP”) is a
2 non-profit organization that strives to unite agencies across Washington State
3 engaged in the elimination of sexual violence. WCSAP provides information,
4 training and expertise to program and individual members who support victims,
5 family and friends, the general public, and all those whose lives have been
6 affected by sexual assault.

7 Incorporated in 1979, the New Jersey Coalition to End Domestic Violence
8 (“NJCEDV”) has provided training, technical assistance, and advocacy around
9 issues involving domestic violence. With a membership of thirty-one domestic
10 violence providers across the state, NJCEDV is the collective voice and advocate
11 for domestic violence survivors, leading collaborative community and systemic
12 responses to domestic violence in the State of New Jersey.

13 Casa de Esperanza was founded in 1982 in Minnesota to provide
14 emergency shelter and support services for women and children experiencing
15 domestic violence, with a primary focus on mobilizing Latinas and Latino
16 communities to end domestic violence. Over the past three decades, Casa de
17 Esperanza has expanded to offer critical and comprehensive services and support,
18 ranging from family advocacy and shelter services to leadership development and
19 community engagement initiatives. In 2009 Casa de Esperanza launched the
20 National Latin@ Network for Healthy Families and Communities (NLN), which

1 is a national resource center that provides training & technical assistance,
2 research, and national policy advocacy focused on addressing and preventing
3 domestic violence and sexual assault. Casa de Esperanza also serves on the
4 Steering Committee of the National Task Force to End Sexual and Domestic
5 Violence. Based on the extensive experience of Casa de Esperanza and our
6 commitment to enhancing access to safety, well-being, and justice for all
7 survivors of gender-based violence, including those from immigrant communities
8 and other underserved populations, we oppose the changes in the public charge
9 rule.

10 The DC Coalition Against Domestic Violence (“DCCADV”) is the
11 federally-recognized statewide coalition of domestic violence programs,
12 organizations, and individuals organized to ensure the elimination of domestic
13 violence in the District of Columbia. We are a resource for the thousands of adults
14 and children experiencing domestic violence in the District each year, as well as
15 the local organizations that serve them. It is with this informed experience that
16 we believe that the Public Charge rule will negatively impact survivors of
17 domestic violence who are experiencing trauma and oppression. Survivors
18 already face many social and economic consequences once they escape an abusive
19 relationship. Implementing this rule will only cause more survivors to not seek
20 the safety and care they need for themselves and their families.

1 The Arizona Coalition to End Sexual and Domestic Violence is the
2 federally-designated state Coalition addressing sexual and domestic violence in
3 Arizona. Our mission is to end sexual and domestic violence in Arizona by
4 dismantling oppression and promoting equity among all people. We support
5 survivors as they access safety and healing by working in partnership with our
6 membership of sexual and domestic violence service providers in the state. The
7 public charge rule will directly impact our work and that of our membership.

8 End Domestic Abuse WI is the statewide coalition against domestic
9 violence and statewide voice for all domestic violence victims in Wisconsin. End
10 Domestic Abuse WI advocates for the safety and protection of all victims,
11 including immigrant victims of domestic and sexual violence. End Domestic
12 Abuse WI educates and provides technical assistance to advocates on strategies
13 to serve and support immigrant victims of domestic violence. End Domestic
14 Abuse WI also operates a law center which provides legal representation to
15 approximately 700 immigrant victims each year, utilizing the applicable laws and
16 remedies that are available for immigrant victims of crime.

17 Founded in 1977, Violence Free Colorado is Colorado's domestic violence
18 coalition, working with hundreds of organizations and individuals in local
19 communities across the Colorado to prevent and end relationship violence, and
20 support those affected by relationship abuse. Violence Free Colorado works to

1 build the capacity of a diverse network of domestic violence and other
2 community-based programs across Colorado to help them effectively assist all
3 survivors of relationship violence and their families, including immigrant
4 survivors. Violence Free Colorado's goal is to improve individual and
5 community health and well-being through statewide visionary advocacy and
6 social change efforts, supporting our members, and informing the public.

7 The Washington State Coalition Against Domestic Violence
8 ("WSCADV") is the federally-recognized membership organization of non-profit
9 domestic violence programs in Washington State. Founded by domestic violence
10 survivors and their allies in 1990, WSCADV's mission is to mobilize and support
11 member programs and allies to end domestic violence through advocacy and
12 action for social change. WSCADV has long advocated for laws, policies, and
13 practices that promote safety and justice for all domestic violence survivors.

14 The Kansas Coalition Against Sexual and Domestic Violence ("KCSDV")
15 has been Kansas' leading voice for domestic violence and sexual assault victims
16 and survivors for 35 years. KCSDV works statewide with partners for the
17 organization's mission of preventing and eliminating domestic violence and
18 sexual assault. The purpose of KCSDV is the prevention and elimination of
19 sexual and domestic violence through a statewide network of programs providing
20 support and safety for all victims of sexual and domestic violence and stalking,

1 with primary focus on women and their children; direct services; public awareness
2 and education; advocacy for victims; comprehensive prevention; and, social
3 change efforts. KCSDV has, for more than 15 years, served victims of domestic
4 and sexual violence with immigration issues. This change in policy will impact
5 many victims served by KCSDV and its 26 member programs across the state that
6 also provide direct services to immigrant victims.

7 The Maine Coalition to End Domestic Violence (“MCEDV”) mobilizes
8 collaborative community action with and on behalf of a statewide network of
9 Domestic Violence Resource Centers to ensure that all people affected by
10 domestic abuse and violence without regard to immigration status are restored to
11 safety and that perpetrators are held accountable. MCEDV is works to ensure that
12 all individuals in Maine who need assistance to be safe from harm are able to
13 obtain it. Access to essential services to meet basic life needs is essential for
14 persons, regardless of immigration status, to be free from impersonal violence.

15 The Iowa Coalition Against Domestic Violence (“ICADV”) is a state-wide,
16 non-profit organization based in Des Moines, Iowa. We represent 25 local
17 agencies providing direct services to victims of domestic and sexual violence and
18 provide civil legal services to survivors statewide. ICADV programs and member
19 agencies served 41,000 victims of violence in 2018. Iowa’s victim service
20 delivery network is recognized for our success in increasing access to services

1 that improve economic stability and effectively meet the long-term needs of
2 survivors, which is critical, as financial abuse remains one of the most powerful
3 methods of keeping a survivor trapped in a violent relationship and deeply
4 diminishes the victim's ability to stay safe after leaving.

5 Incorporated in 1986, the Montana Coalition Against Domestic & Sexual
6 Violence ("MCADSV") is a statewide coalition of individuals and organizations
7 working together to end domestic and sexual violence through advocacy, public
8 education, public policy, and program development. MCADSV's mission is to
9 support and facilitate networking among member organizations while advocating
10 for social change in Montana. MCADSV represents over 50 programs across
11 Montana that provide direct services to victims and survivors of domestic and
12 sexual violence and their children. In addition, MCADSV's membership includes
13 nonprofit and government organizations and individuals interested in addressing
14 domestic and sexual violence in a way that holds offenders accountable and
15 provides support for the people they victimize. MCADSV is committed to the
16 safety, growth, and empowerment of all survivors and their families.

17 The Vermont Network Against Domestic and Sexual Violence is the
18 leading voice on ending domestic and sexual violence in Vermont. The Network
19 is a statewide non-profit 501c3 membership organization that was founded in
20 1986. The Network's members are 15 independent non-profit which provide

1 domestic and sexual violence advocacy to survivors of violence in Vermont. The
2 Network supports its member organizations and their work with survivors of
3 domestic and sexual violence through policy change, training and social change
4 efforts to change the narrative of violence in Vermont. The Network's purpose is
5 to uproot the causes of violence and to build a world free of oppression where
6 actions, beliefs and systems support all people to thrive. The Network believes
7 the changes to the Public Charge Rule will endanger victims of domestic violence
8 and human trafficking.

9 The South Carolina Coalition Against Domestic Violence and Sexual
10 Assault (“SCCADVASA”), is the statewide coalition of organizations providing
11 intervention services to victims and survivors of domestic violence and sexual
12 assault and Primary Prevention programs to students and communities across
13 South Carolina. SCCADVASA works towards ending domestic and sexual
14 violence in South Carolina and beyond through engaging individuals and
15 communities in advocacy, collaboration and education. SCCADVASA and its 22
16 member organizations directly serve immigrant survivors of domestic violence,
17 sexual assault, and human trafficking. SCCADVASA is deeply concerned about
18 the fact that this new public charge rule creates substantial barriers for victims in
19 their efforts to access the medical and other supportive services needed to fully
20

1 recover from the immediate effects of their victimization, reduce their
2 vulnerability to further victimization and ensure meaningful access to justice.

3 The Texas Council on Family Violence (“TCFV”) is the statewide coalition
4 in Texas of family violence service providers and allied programs working to
5 promote safe and healthy relationships by supporting service providers,
6 facilitating strategic prevention efforts, and creating opportunities for freedom
7 from family violence. TCFV is a membership organization with over 1300
8 members comprised of family violence programs, supportive organizations,
9 survivors of family violence, businesses and professionals, communities of faith
10 and other concerned citizens. In promoting safe and healthy relationships, TCFV
11 advocates for the well-being of all Texans and recognizes the increased
12 vulnerability and need for specific attention and protections for those from
13 historically marginalized populations, including immigrant survivors of violence
14 and abuse. As the statewide advocacy voice standing with and for survivors of
15 family violence, we support survivors of abuse at the hands of family members
16 and intimate partners and the vital pathways to relief and healing.

17 The Ohio Domestic Violence Network (“ODVN”) is a statewide coalition
18 domestic violence in the state of Ohio. ODVN advances the principles that all
19 people have the right to an oppression and violence free life; fosters changes in
20

1 our economic, social and political systems; and brings leadership, expertise and
2 best practices to community programs.

3 The mission of Jane Doe Inc., The Massachusetts Coalition Against Sexual
4 Assault and Domestic Violence (“JDI”), is to bring an end to sexual and domestic
5 violence through social change by addressing the systemic root causes of
6 violence. These changes to the public charge rule are in direct opposition to JDI’s
7 mission as this new rule furthers the oppression of immigrant communities and
8 significantly harms immigrant survivors of sexual and domestic violence seeking
9 admissibility by punishing them for utilizing services as they seek safety and
10 healing.

11 The Illinois Accountability Initiative (“IL-AI”) strives to support LGBTQ
12 people in their self-determined efforts to create and sustain accountability
13 practices in local communities, among individuals, and within systems and
14 institutions. IL-AI believes that community accountability practices can increase
15 safety and reduce harm in the lives of LGBTQ people, transforming communities
16 and directly challenging social conditions that support oppression and violence in
17 many forms. IL-AI is concerned that the public charge rule changes to
18 admissibility that makes it harder for survivors of violence and their families to
19 find safety and stay in the United States.

1 The Idaho Coalition Against Sexual & Domestic Violence is a non-profit
2 organization that seeks to create a world free of violence; one with social equity
3 and liberation for all human beings where we see our own and each other's full
4 humanity. We seek a world where everyone is valued, everyone is safe, and
5 everyone can thrive.

6 The North Carolina Coalition Against Domestic Violence ("NCCADV") is
7 the only statewide agency in North Carolina whose mission is to end domestic
8 violence in this state. NCCADV works to combat violence and oppression against
9 all survivors, and we are committed to serving all survivors in our state, including
10 our immigrant survivors. Through a combination of training, technical assistance,
11 legislative and policy work, and systems advocacy, we provide survivors and
12 member agencies with the tools they need to do their work and make our state a
13 safe place for all.

14 The Nebraska Coalition to End Sexual and Domestic Violence (the
15 "Coalition") is a non-profit organization whose membership consists of 20
16 domestic violence and sexual assault programs across Nebraska. The Coalition's
17 mission is to enhance safety and justice by changing the beliefs that perpetuate
18 domestic violence and sexual assault. The Coalition has provided legal services
19 to survivors of domestic and sexual violence since 2003 and assisted immigrant
20 victims since 2006.

1 The Kentucky Coalition Against Domestic Violence (“KCADV”) provides
2 a strong, statewide voice on behalf of survivors, their children, and its 15 member
3 programs in Kentucky. KCADV advocates on domestic violence-related issues
4 at the state and federal levels, mobilizing and supporting its member programs
5 and allies to end intimate partner violence. KCADV works with all survivors of
6 domestic violence, including immigrant survivors: in particular, by supporting
7 survivors in accessing housing. KCADV is concerned about the impacts that
8 economic deficits and poverty have on the lives of survivors, and that immigrant
9 survivors who fear obtaining or using public assistance, including rent subsidies
10 that KCADV provides, will dramatically hamper their ability to become self-
11 sufficient.

12 The Delaware Coalition Against Domestic Violence (“DCADV”) is a
13 statewide, nonprofit organization and coalition of organizations, groups and
14 individuals that strive to promote conditions that prevent and eliminate domestic
15 violence by educating its members and community partners; providing
16 informational resources to the community; and advocating as a strong, unified
17 voice for victims/survivors of domestic violence, children who are affected,
18 domestic violence programs and victim service providers. DCADV is deeply
19 concerned about the safety of all victims of intimate partner violence, including

1 immigrants, and the proposed changes to the Public Charge rule jeopardize the
2 safety of domestic violence victims.

3 The Illinois Coalition Against Domestic Violence (“ILCADV”) is a
4 membership organization representing the interest of 50 domestic violence
5 agencies statewide. Many of those organizations serve immigrant populations
6 and those survivors affected by the rule change. ILCADV’s policy committee is
7 deeply committed to addressing issues relating to immigrant survivors.

8 The Rhode Island Coalition Against Domestic Violence (“RICADV”)
9 works to eliminate domestic violence in Rhode Island. RICADV’s mission is to
10 support and enhance the work of its member agencies and to provide leadership
11 on the issue of domestic violence. In order to achieve its vision, RICADV focuses
12 on enhanced services for survivors, prevention, survivor activism,
13 communications, systems change and training. Every year in Rhode Island,
14 between 8,000-10,000 individual victims of domestic violence receive services
15 from RICADV member agencies, including: Emergency shelter and transitional
16 housing; 24-hour crisis hotline support; Counseling; Support groups; Court
17 advocacy; and law enforcement advocacy. RICADV has grave concerns
18 regarding the immense harm that the public charge rule will have on immigrant
19 survivors of domestic violence and sexual assault.

1 The Nevada Coalition to End Domestic and Sexual Violence (“NCEDSV”)
2 provides statewide advocacy, education and support of the front-line
3 organizations in Nevada that help those impacted by domestic violence and sexual
4 assault. NCEDSV supports its member organizations by providing resources,
5 assisting them in finding financial resources to maintain their operations, and
6 providing educational opportunities for their staff, board members, and
7 volunteers, ensuring they have access to best practices. NCEDSV’s purpose is to
8 advocate for change, educate our communities, and support organizations.
9 NCEDSV is concerned how public charge will negatively and very drastically
10 effect survivors of domestic violence and sexual assault.

11 The Mississippi Coalition Against Domestic Violence (“MCADV”) is a
12 statewide resource on domestic violence issues in Mississippi. MCADV’s mission
13 is to bring about social change through advocacy, technical assistance and public
14 awareness. MCADV provides support for its twelve member shelter programs
15 through training, technical assistance and capacity building; advocate for public
16 policy that supports victims; and seek to change societal attitudes and beliefs
17 through awareness and prevention activities in communities throughout
18 Mississippi. MCADV’s interest in the public charge rule is the possible harm to
19 victims of domestic violence.

1 **III. WHY AMICUS BRIEFING WILL ASSIST THE COURT**

2 “The district court has broad discretion to appoint amici curiae.” *Hoptowit*
 3 *v. Ray*, 682 F.2d 1237, 1260 (9th Cir. 1982), *abrogated on other grounds*
 4 *by Sandin v. Conner*, 515 U.S. 472 (1995). “An amicus brief should normally be
 5 allowed . . . when the amicus has unique information or perspective that can help
 6 the court beyond the help that the lawyers for the parties are able to provide.”
 7 *Cmtys. Ass’n for Restoration of Env’t (CARE) v. DeRuyter Bros. Dairy*, 54 F. Supp.
 8 2d 974, 975 (E.D. Wash. 1999).

9 Here, Amici have unique perspective and information to share with the
 10 Court as state and national organizations advocating for and providing direct
 11 services to victims of domestic violence, sexual assault, and trafficking, who
 12 would be harmed significantly by Defendants’ “public charge” rule (the “Rule”).
 13 The proposed brief would assist the Court by explaining how and to what extent
 14 the Rule will harm victims of gender-based violence and their families, who rely
 15 on access to public benefits to escape and overcome abuse. The proposed brief
 16 would also describe the significant costs to our communities as a result of the
 17 Rule, which Defendants’ omitted entirely from their analysis of the Rule’s costs
 18 and benefits.

IV. CONCLUSION

For the foregoing reasons, Amici respectfully request leave to file the attached amici curiae brief in support of Plaintiffs' motion for preliminary injunction.

DATED this 9th day of September, 2019.

PACIFICA LAW GROUP LLP

By: s/ Paul J. Lawrence

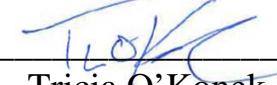
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2 **CERTIFICATE OF SERVICE**
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4

I hereby certify that on this 9th day of September, 2019, I electronically filed
the foregoing document with the United States District Court ECF system, which
will send notification of such filing all parties of record.

Dated this 9th day of September, 2019.

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8 Tricia O'Konek
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