

April 11, 2025

Mark Phillips
Division Chief, Residence and Naturalization Division
Office of Policy and Strategy
U.S. Citizenship and Immigration Services
5900 Capital Gateway Drive
Camp Springs, MD 20746

RE: **DHS Docket No. USCIS-2025-0004, Alien Registration Form and Evidence of Registration; RIN 1615-AC96**
Submitted via <https://www.regulations.gov>

Dear Mr. Phillips,

On behalf of the 50 undersigned organizations, we submit this comment in response to the Department of Homeland Security's (DHS) Interim Final Rule "Alien Registration Form and Evidence of Registration," published in the Federal Register on March 12, 2025¹ (hereinafter "IFR").

Our organizations assist, uplift, and advocate on behalf of immigrant survivors of domestic violence, sexual assault, human trafficking, and other abuses. Given the focus of our work, **we stridently oppose the IFR and call for its immediate withdrawal.** The IFR contributes to the significant climate of fear in our communities and harms immigrant survivors of domestic violence, sexual assault, human trafficking and other crimes - populations that Congress has aimed to protect under various laws for the past several decades. In the event the IFR is not withdrawn or rescinded, we urge DHS to amend the IFR or otherwise take steps to protect survivors.

I. The IFR significantly impacts immigrant survivors of domestic violence, sexual assault, human trafficking and other crimes.

Over 30 years ago, a bipartisan Congress created immigration protections in the landmark Violence Against Women Act (VAWA) recognizing that abusers often use immigration status as a tool of abuse and that immigrant survivors may not be willing to reach out for help because of the threat or fear of removal. The VAWA self-petition process grants certain abused family members of U.S. citizens or legal permanent residents "the ability to self-petition for immigrant classification without the abuser's knowledge, consent, or participation in the immigration process. This allows victims to seek both safety and independence from their abuser."²

¹ Alien Registration Form and Evidence of Registration, 90 Fed. Reg. 11,793 (Mar. 12, 2025) (to be codified at 8 C.F.R. 264.1) (hereinafter "IFR")

² USCIS Policy Manual. "Volume 3, Part D - Violence Against Women Act Chapter 1 - Purpose and Background" (current as of April 2, 2025), available at <https://www.uscis.gov/policy-manual/volume-3-part-d-chapter-1>

Later Congress established, also in a bipartisan fashion, two additional remedies for immigrant survivors in the Trafficking Victims Protection Act (TVPA): the T visa to assist victims of human trafficking, and the U visa to assist noncitizen victims of certain qualifying crimes (including domestic violence, sexual assault, and stalking) who are willing to assist in the investigation or prosecution of those crimes. In creating these new remedies for immigrant victims, Congress recognized the importance of fostering cooperation between undocumented victims and law enforcement or other agencies tasked with investigating crimes.³ These protections play a critical role in helping immigrant survivors find independence, safety and stability for themselves and their children.

Without accounting for the concerns of survivors and the goals of the VAWA and TVPA programs, the IFR will put survivors' and their children's safety at risk-including U.S. citizen children-and prevent them from accessing relief Congress specifically intended for them.

A. Privacy Implications

Privacy and confidentiality are essential to the agency and safety of survivors of domestic violence, sexual assault, human trafficking and other crimes. In recognition of this, Congress created critical protections for victims under laws such as VAWA,⁴ and the Family Violence Prevention and Services Act⁵ so that survivors' information is properly safeguarded.⁶

In 1996, Congress codified protections at 8 U.S.C. §1367 for victims eligible for immigration benefits under VAWA. These protections were enhanced in 2000 to cover victims of trafficking applying for T nonimmigrant status and victims of qualifying criminal activities petitioning for U nonimmigrant status.⁷ 8 U.S.C. §1367 prohibits DHS, the Department of Justice (DOJ) and the Department of State (DOS) from making an adverse determination of admissibility or deportability against a protected person using information furnished solely by a prohibited source, including an abuser, trafficker or perpetrator of crime, or a member of their family.⁸ The statute also generally prohibits the unauthorized disclosure of **any** information relating to a beneficiary of a pending or approved application

³ See §1513(a)(2)(A), Public Law No: 106-386, 114 Stat. 1464. Congress found that "providing battered immigrant women and children . . . with protection against deportation . . . frees them to cooperate with law enforcement and prosecutors in criminal cases brought against their abusers."

⁴34 USC §12291(b)(2)(A), noting "[i]n order to ensure the safety of adult, youth, and child victims of domestic violence, dating violence, sexual assault, or stalking, and their families, grantees and subgrantees... shall protect the confidentiality and privacy of persons receiving services."

⁵ 42 U.S.C. §10406(c)(5)(A).

⁶ See also regulatory language implementing the Victims of Crime Act at 28 CFR 94.115.

⁷ Representative Conyers Jr. Congressional Record 151: 164 (December 18, 2005) E2606-7, Available at: <https://www.congress.gov/crec/2005/12/18/CREC-2005-12-18-pt1-PgE2605-4.pdf>

⁸ 8 U.S.C. §1367(a)(1).

for victim-based benefit to anyone other than an officer or employee of DHS, DOJ, or DOS for a legitimate agency purpose, unless an exception applies.⁹

Again, Congress recognized that protections were vital to ensure that abusers, traffickers and perpetrators of crime could not weaponize the immigration system against their victims. Examples of this “include abusers using DHS to obtain information about their victims, including the existence of a VAWA immigration petition, interfering with or undermining their victims’ immigration cases, and encouraging immigration enforcement officers to pursue removal actions against their victims.”¹⁰

DHS guidance illustrates the harm that these violations could cause, stating, “[v]iolations of Section 1367 could give rise to serious, even life-threatening, dangers to victims and their family members. Violations compromise the trust victims have in the efficacy of services that exist to help them and, importantly, may unwittingly aid perpetrators in retaliating against, harming or manipulating victims and their family members, and in eluding or undermining criminal prosecutions.”¹¹

The IFR does not outline how the registration process will comply with statutory privacy and confidentiality provisions at all. The Form G-325R, Alien Registration Form and Evidence of Registration makes a single citation to 8 U.S.C. §1304(b); however, it does not provide additional context or explain the parameters of disclosure under the registration-focused confidentiality provisions.¹² The Form G-325R also mentions that DHS may share the information, as appropriate, for law enforcement purposes or in the interest of national security.¹³ However, DHS disclosure of information must adhere to 8 U.S.C. §1367 and related guidance.¹⁴

⁹ 8 USC §1367(a)(2); 8 U.S.C. §1367(b) [Emphasis added].

¹⁰ See note 7, *supra* at E2607.

¹¹ DHS Instruction 002-02-001.Revision 001. “Implementation of Section 1367 Information Provisions” (November 7, 2013) available at <https://www.dhs.gov/sites/default/files/2022-12/002-02-001%20Implementation%20of%20Section%201367%20Information%20Provisions%3B%20Revision%2000.1.pdf>

¹² See Form G-325R- Biographic Information (Registration), available at <https://www.regulations.gov/document/USCIS-2025-0004-0022>. 8 U.S.C. 1304(b) states that “all registration and fingerprint records made under the provisions of this subchapter **shall be confidential**, and shall be made available **only** (1) pursuant to section 1357(f)(2) of the INA and (2) to such persons or agencies as may be designated by the Attorney General.” [Emphasis added]. The IFR does not specify which persons or agencies have been designated by the Attorney General to receive this information.

¹³ *Id.*

¹⁴ 8 U.S.C. §1367(b) provides that the “Secretary of Homeland Security or the Attorney General may provide in the discretion of the Secretary or the Attorney General for the disclosure of information to law enforcement officials to be used solely for a legitimate law enforcement purpose **in a manner that protects the confidentiality of such information.**” [Emphasis added]. This is not accounted for in the IFR or the Form G-325R. See also DHS Directive 215-01 and DHS Instruction 215-01-001 Disclosure Of Section 1367 Information To National Security Officials For National Security Purposes; and DHS Instruction 215-01-002, Disclosure Of Section 1367 Information To Law Enforcement Officials For Legitimate Law Enforcement Purposes, available at <https://www.dhs.gov/sites/default/files/publications/1367%20PCR%20Report%20FINAL%2020190204.pdf>.

Further, the Form G-325R cites systems of record notices and privacy impact assessments (PIAs) related to the CLAIMS 3¹⁵ and ELIS data management systems,¹⁶ as well as the Benefit Request Intake Process.¹⁷ Each of these PIAs mentions the privacy risks involved in an over collection of information to make a benefit determination, thus violating the Privacy Act's data minimization requirements. DHS notes that these risks are mitigated by negotiation and approval by the Office of Management and Budget (OMB) during Paperwork Reduction Act (PRA) information collection reviews.¹⁸

However, the Form G-325R received emergency authorization from OMB and did not follow the typical PRA process.¹⁹ DHS has not provided any justification for this emergency authorization or justified its publication online prior to the posting of the IFR on March 12, 2025.²⁰ Generally, new information collections are subject to a 60-day public comment period and then, following OMB review, receive a second 30-day notice.²¹ In this case, DHS has circumvented the PRA and caused confusion both for the public providing comment and for those who may be required to register.²² In obfuscating the standard process of the PRA, DHS has taken away an opportunity for the public to meaningfully review the Form G-325R before its implementation, and as such, DHS should rescind the form in its entirety.

Should the IFR go into effect, DHS must clarify how the registration process complies with 8 USC § 1367 and other privacy laws to ensure protected individuals' private information remains confidential.

B. Requiring Crime Victims Already Seeking Lawful Status to Register is Unnecessary, Inefficient, and Undermines the Purpose of VAWA and the TVPA.

The IFR deems certain individuals already registered if they have applied for or received certain types of immigration relief or have had certain interactions with DHS.²³

¹⁵ The Form G-325R mentions the Privacy Impact Assessment (PIA) cited at DHS/USCIS/PIA-016 USCIS Computer Linked Application Information Management System (CLAIMS 3) which is from September 5, 2008, available at https://www.dhs.gov/sites/default/files/publications/privacy_pia_cis_claims3_2008.pdf;

¹⁶ Similarly, the Form G-325R mentions the PIA cited at DHS/USCIS/PIA-056(a) USCIS Electronic Immigration System (ELIS) which was initially published in December 2018 with an appendix update in 2024, available at https://www.dhs.gov/sites/default/files/2024-07/privacy-pia-uscis056a-elisappendixbupdate-july2024_o.pdf

¹⁷ DHS. "DHS/USCIS/PIA-061 Benefit Request Intake Process" available at https://www.dhs.gov/puhttps://www.dhs.gov/sites/default/files/2024-07/privacy-pia-uscis056a-elisappendixbupdate-july2024_o.pdfpublication/dhs-uscis-pia-061-benefit-request-intake-process

¹⁸ See *Id* at 14; See also note 16 *supra* at 19-20 and note 15 *supra* at 14.

¹⁹ IFR at 11799.

²⁰ *Id*,

²¹ Administrative Conference of the United States."Information Interchange Bulletin No. 025 Paperwork Reduction Act Basics" (August 2022) available at <https://www.acus.gov/sites/default/files/documents/25%20PRA%20Basics.pdf>

²² It is also worth noting that the Form G-325R has the exact same language for the purpose and disclosure portions of the form, which is confusing at best and indicative of the hasty manner in which the IFR and related information collections were released.

²³ IFR at 11794-11795.

Because the IFR relies on the 1940 Alien Registration Act, the forms of relief and forms that "count" towards registration are extremely limited²⁴, and exclude those created over the past 80 years, including VAWA/T/U based relief.

When applying for such relief, benefit requestors are required to provide much of the same information solicited by the Form G325R, and often more.²⁵ For example, survivors must submit evidence of good moral character for a VAWA self-petition such as affidavits and a local police clearance or state-issued criminal background check or similar report from each locality or state in or outside the United States where they have resided for 6 or more months during the 3-year period immediately before filing the self-petition.²⁶ Similarly, survivors applying for T or U nonimmigrant status must answer numerous questions regarding their criminal and immigration history and submit biometrics shortly after filing.²⁷ Because the information and evidence contained in VAWA/T/U benefit requests is sufficient to grant legal status (and may even exceed the level of detail the Form G325R will elicit) it is unnecessary to solicit this information twice for petitioners for such relief.

Further, one of the explicit goals of the IFR is "to improve DHS law enforcement efficacy, because law enforcement personnel would have access to a more comprehensive registration data." Yet, by using registration as an immigration enforcement tool against VAWA/T/U benefit requestors seeking lawful status, the registration requirement of the IFR creates additional uncertainties and undermines VAWA and the TVPA if victims who register are removed before their cases are adjudicated as a result.

Though we call for the rescission of the IFR, should it go into effect, VAWA/T/U benefit requestors should be considered already registered under 8 USC 1304 and categorically not be required to file Form G-325R.

C. Manipulation By Abusers

As recognized by VAWA, immigration-related abuse is a common tactic used by abusers and perpetrators of crime to maintain power and control over victims.²⁸ Survivors report that abusive partners "often threatened them with halting or stopping their immigration process. Common threats included contacting immigration or withholding the

²⁴ See 8 CFR § 264.1(a) and (b).

²⁵ 8 USC § 1304.

²⁶ USCIS. Instructions for Petition for Amerasian, Widow(er), or Special Immigrant- Form I-360 (edition date 04/01/2024), available at <https://www.uscis.gov/sites/default/files/document/forms/i-360instr.pdf>.

²⁷ VAWA self-petitioners similarly must submit biometrics if submitting a Form I-765: Application for Employment Authorization Document or a Form I-485. Application to Register Permanent Residence or Adjust Status.

²⁸ National Center for Domestic and Sexual Violence. "Immigrant Power and Control Wheel", available at <https://www.tahirih.org/wp-content/uploads/2015/06/Immigrant-Power-and-Control-Wheel.pdf>

[survivors'] green card."²⁹ As survivors may rely on their abusive spouse for their legal status, these threats coerce survivors to stay silent about the abuse they endure.³⁰

Furthermore, abusers are increasingly using technology to abuse, exploit, intimidate, or threaten victims.³¹ 80% of stalking victims report being stalked through the use of technology, and 36% of reported stalking incidents occurred when the offender was a former or current intimate partner of the victim.³²

We are also concerned that abusers and perpetrators of crime will try to exploit the registration process to manipulate survivors either by blocking their access to technology, preventing them from completing their biometrics appointment, or otherwise interfering with their ability to comply.

A victim-centered approach requires DHS to provide flexibility, allowing survivors to correct any abuser-generated inconsistencies in their application and to consider how victimization may impact an individual's opportunity to comply with the registration process prior to conducting enforcement actions under 8 U.S.C. §1306(a). **If DHS does not rescind the IFR, we urge DHS to include a provision to provide flexibility to survivors in the process of completing the Form G-325R.**

D. The IFR's Address Requirements Create Safety Risks for Survivors

The IFR requires both a physical and mailing address on the G-325R, and directs individuals to notify DHS in writing of each change of address and new address within ten days.³³ Failure to comply may result in criminal consequences or deportation unless they can show that the failure was "reasonably excusable" or not willful.³⁴

Leaving an abusive relationship can be the most dangerous time for survivors.³⁵ As one survivor notes, "I recall one day in September, 2007, I told him that I was leaving, but he pulled out a sharp small knife and he broke my suitcases and he punched my left muscle. He told me some very bad things such as he was [going] to kill me if I left..."³⁶ This is why

²⁹ Monica Scott, Shannon Weaver and Akiko Kamimura. "Experiences of Immigrant Women who Applied for Violence Against Women Act (VAWA) self-petitions in the United States: Analysis of Legal Affidavits." *Diversity and Equality in Health and Care* (2018) 15(4): 145-150, available at <https://www.primescholars.com/articles/experiences-of-immigrant-women-who-applied-for-violence-against-women-act-vawa-self-petition-in-the-united-states-analysis-of-legal-affidavits>

³⁰ *Id.*

³¹ New York Cyber Abuse Taskforce, <https://cyberabuse.nyc/>

³² Stalking Prevention and Awareness Resource Center. "Technology and Stalking" available at https://www.stalkingawareness.org/wp-content/uploads/2022/12/SPARC_Stalking-Technology-Infographic.pdf

³³ IFR at 11794.

³⁴ 8 USC §1227(a)(3)(A). 8 U.S.C. 1306(b)

³⁵ See Women Against Abuse,

<https://www.womenagainstabuse.org/education-resources/learn-about-abuse/why-its-so-difficult-to-leave>

³⁶ See note 29, *supra*.

many domestic violence shelters maintain confidential locations, and most states have laws establishing address confidentiality programs to assist eligible survivors in keeping their location confidential.³⁷ For example, victims of domestic violence, dating violence, sexual assault, stalking or trafficking, may be entitled to enroll in State address confidentiality programs, whose addresses are entitled to be suppressed under State or Federal law or suppressed by a court order, or who are protected from disclosure of information pursuant to section 384 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (8 U.S.C. 1367). This is also why it may be very difficult for a survivor to safely comply with such a stringent address change notification requirement.

Congress recognized the importance of address confidentiality in the VAWA Reauthorization of 2005, directing DHS to develop regulations and guidance with regard to identification documents to “consider and address the needs of victims, including victims of battery, extreme cruelty, domestic violence, dating violence, sexual assault, stalking or trafficking, who are entitled to enroll in State address confidentiality programs, whose addresses are entitled to be suppressed under State or Federal law or suppressed by a court order, or who are protected from disclosure of information pursuant to section 384 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (8 U.S.C. 1367)”³⁸

While the Form G-325R mentions “safe addresses,” the IFR does not explain what this means in the context of registration. In fact, there are no instructions for the Form G-325R at all, except what is provided on the registration page through myUSCIS, which is only in English. For survivors experiencing housing insecurity, who live in safe housing facilities, or who otherwise must keep their address confidential, the IFR and Form G-325R does not address their safety concerns.

In light of the above, **if DHS does not rescind or withdraw the IFR, it must provide clear guidance on safe addresses, including how survivors can comply with physical address requirements while maintaining their safety.** This could include allowing the use of P.O. boxes or alternative addresses associated with address confidentiality programs in lieu of a physical address, and amending the IFR to deem it per se “reasonably excusable” or “not willful” when any survivor, including those who have yet to file a petition for relief, can show a connection between abuse and their inability to supply a physical address or their inability to timely notify DHS of a change of address.

E. The IFR’s proof of registration requirement disproportionately impacts survivors.

The IFR cites 8 U.S.C. §1304(e) requiring individuals over 18 to carry or have in their personal possession their proof of registration at all times or face criminal consequences or

³⁷ See Safety Net Project “Address Confidentiality Programs” available at <https://www.techsafety.org/address-confidentiality-programs>

³⁸ Pub. Law. 109-162, §827 (Jan. 5, 2006), 119 STAT. 3066

finer.³⁹ Enforcing this arcane criminal penalty will inevitably result in arbitrary enforcement actions ripe for unlawful racial profiling, impacting immigrants and U.S. citizens alike. Such profiling is already occurring.⁴⁰ Indeed, past usage of the registration requirements in the United States have resulted in endemic harms and racial profiling, which are among the most painful and shameful episodes in American history. Enforcement of the criminal penalty for “failure to carry proof of registration” will impede community trust in and cooperation with law enforcement and make communities less safe.⁴¹

Unlike the change of address requirements where a person may demonstrate that failure to comply was not willful or otherwise reasonably excusable, there is no such consideration in this context. The strict liability of these provisions will unjustly harm survivors of violence who, through no fault of their own, may not be in possession of or able to safely access their documents. Given these realities, it is an abuse of discretion for DHS not to consider factors such as emergencies, abuse, and health conditions, among others in its criminal, civil and immigration enforcement actions under 8 USC § 1304(e). **If the IFR is not withdrawn, DHS should amend it to exempt survivors from this provision, or permit survivors to establish compliance by demonstrating that their inability to carry proof of registration is related to their victimization.**

II. The IFR will increase costs and burdens for organizations serving survivors.

A central purpose of the Paperwork Reduction Act of 1995 (PRA) codified in the statute is to reduce the burden on individuals, small businesses, and educational and nonprofit organizations resulting from the collection of information by or for the Federal Government.⁴² The Form G-325R and the IFR contravene the purpose of the PRA as they impose an undue burden on organizations serving survivors, increasing their operational costs and administrative workload.

Given the complexity of determining to whom the registration requirements apply and the individual liberties - and in some cases personal safety - the registration process puts at stake, service providers will need to allocate an exorbitant amount of time and resources to effectively inform their clients of and assist their clients in completing the Form G-325R. Furthermore, the IFR will especially burden organizations that serve Limited English Proficiency (LEP) and low-income communities. The limited language access and the online format of the registration process create barriers to compliance for these populations through no fault of their own, requiring service providers to offer additional translation support and technology assistance for which they may not have capacity.

³⁹ IFR at 11794.

⁴⁰ See, e.g., Maria Luisa Paul. “As Trump cracks down on immigration, U.S. citizens are among those snared” Washington Post, April 5, 2025 (available at <https://www.washingtonpost.com/immigration/2025/04/05/us-citizens-deported-immigration/>)

⁴¹ See e.g., Center for American Progress “How 287(g) Agreements Harm Public Safety” (May 8, 2018), available at <https://www.americanprogress.org/article/287g-agreements-harm-public-safety/>

⁴² 44 USC § 3501(1).

III. The IFR does not fall within the procedural rule exception to the Administrative Procedure Act.

DHS should withdraw the IFR as it is improvidently issued in violation of federal law. The administration chose to bypass the ordinary rulemaking process set out by the Administrative Procedure Act and instead render the Rule effective 30 days after publication without any meaningful opportunity for public comment before its implementation.

DHS justifies issuing the IFR without prior notice and opportunity for comment under the procedural-rule exception,⁴³ which "covers agency actions that do not themselves alter the rights or interests of parties, although it may alter *the manner* in which the parties present themselves or their viewpoints to the agency."⁴⁴ This assertion is undeniably false—the IFR is not a procedural rule because it alters the rights and interests of millions of individuals, imposes new substantive obligations and exposure to criminal liability, and collects considerable personal information not required by the Immigration and Nationality Act. The IFR cites *JEM Broadcasting Company, Inc. v. FCC* a 1994 D.C. Circuit Case holding that the FCC's "hard look" rules were procedural, even though they limited the ability of license applicants to amend their applications.⁴⁵ The Court determined "the critical fact ... is that the "hard look" rules *did not change the substantive standards* by which the FCC evaluates license applications, e.g., financial qualifications, proposed programming, and transmitter location."⁴⁶

In contrast, the IFR drastically changes substantive standards of a registration requirement first outlined in a statute promulgated over 80 years ago, DHS claims that the IFR "merely" adds another method for compliance with the existing statutory registration requirements and does not alter the rights or interests of any party.⁴⁷ DHS' justifications could not be further from reality. The IFR creates an entirely new process and information collection, impacting 2.2 to 3.2 million individuals.⁴⁸ It is based on a long dormant law from the World War II era, significantly departing from its original narrow application. Even a superficial review of the law's antecedents reveals that the U.S. has effectively abandoned universal noncitizen registration for three quarters of a century.⁴⁹

⁴³ 5 USC §553(b)(A).

⁴⁴ *Batterton v. Marshall*, 648 F.2d 694, 707 (D.C. Cir. 1980) [Emphasis added]

⁴⁵ 22 F.3d. 320 (D.C. Cir. 1994)

⁴⁶ *Id* at 327.

⁴⁷ IFR at 11796.

⁴⁸ *Id.* at 11797.

⁴⁹ Nancy Morawetz & Natasha Fernandez-Silber, *Immigration Law and the Myth of Comprehensive Registration*, 48 U.C. Davis L. Rev. 141 (2014), available at https://lawreview.law.ucdavis.edu/sites/g/files/dgvnsk15026/files/media/documents/48-1_Morawetz_Fernandez-Silber.pdf.

IV. Conclusion

For the reasons mentioned above, we hold that DHS should promptly withdraw the IFR as it will impose an unjustified burden on survivors and on service providers who assist them. We can, and must, do better for survivors, for our communities and for our country.

Respectfully submitted,

National Organizations

Asian Pacific Institute on Gender Based Violence
ASISTA Immigration Assistance
Center for Human Rights and Constitutional Law
Esperanza United
Freedom Network USA
Jewish Women International
Just Solutions
Justice and Joy National Collaborative
Legal Momentum, The Women's Legal Defense & Education Fund
National Alliance to End Sexual Violence
National Immigrant Justice Center
National LGBTQ Institute on Intimate Partner Violence
National Network To End Domestic Violence
National Resource Center on Domestic Violence
National Women's Political Caucus
Sexual Violence Prevention Association
SWOP Behind Bars Inc
Tahirih Justice Center
Victim Rights Law Center
Women's Refugee Commission
YWCA USA

State and Local Organizations

California

California Partnership to End Domestic Violence
Coalition to Abolish Slavery and Trafficking
Immigration Center for Women and Children
Justice at Last
Legal Aid Society of San Mateo County
Los Angeles LGBT Center
Survivor Justice Center

Connecticut

Connecticut Institute for Refugees and Immigrants

District of Columbia

DC Coalition Against Domestic Violence

Illinois

Legal Aid Society of Metropolitan Family Services
Life Span

Iowa

Iowa Coalition Against Domestic Violence

Kansas

Kansas Coalition Against Domestic Violence

Massachusetts

Jane Doe Inc.

Minnesota

Violence Free Minnesota

New Jersey

New Jersey Coalition Against Domestic Violence

New Mexico

Santa Fe Dreamers Project

New York

Lutheran Social Services of New York

Oregon

Oregon Coalition Against Domestic Violence

Texas

American Gateways
Law Office of David Nguelyn, PC

Utah

Utah Domestic Violence Coalition

Vermont

Vermont Network Against Domestic and Sexual Violence

Washington

Chamberlain & Rae, PLLC

Northwest Immigrant Rights Project

Law Offices of Shara Svendsen PLLC

Souza Immigration Law PLLC

Washington State Coalition Against Domestic Violence