

Exhibit A



International Refugee
Assistance Project

RECORDS REQUESTED

IRAP seeks disclosure of:

1. Records sufficient to show, period of March 2021-present, with respect to pending cases in the Central American Minors (CAM) Refugee and Parole Program for beneficiaries in Central America, and with respect to pending "CAM re-parole" Form I-131 applications for CAM parolees in the United States:
 - a. The threshold used to determine whether a person filing Form I-134 has sufficient financial strength to be a sponsor;
 - b. The documentary evidence necessary to show that a person filing Form I-134 has sufficient financial strength to be a sponsor;
 - c. The decision-making matrix and/or other similar documents used by the agency in connection with its determination as to whether a person filing Form I-134 has satisfied the above-described threshold and documentary evidence requirements and can be approved as a sponsor;
 - d. The guidance, decision-making matrix and/or other similar documents used by agency adjudicators with respect to whether a Request for Evidence (RFE) is to be issued, if distinct from the materials in 1.c..

I request that the aforementioned records be released to me on a rolling basis as they are precured.

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Marina Salguero
U.S. Litigation Fellow
International Refugee Assistance Project
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Please notify us in advance if the cost of producing the documents requested exceeds \$100.00. If you have any questions regarding this request, please contact Marina Salguero at msalguero@refugeerights.org or 646-946-6965.

Sincerely,

Marina Salguero



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FEE WAIVER REQUEST

IRAP is a non-profit organization with a mission that includes disseminating current information about issues related to pathways to safety for displaced persons, particularly in respect to the Central American Minors (CAM) Program for parole and reparole. *See* [CAM Legal Info](https://refugeerights.org/who-we-are/mission-values); <https://refugeerights.org/who-we-are/mission-values>.

IRAP seeks a public interest fee waiver, 5 U.S.C. § 552(a)(4)(A)(iii), as IRAP has no commercial interest in the records requested and the records requested are likely to contribute significantly to public understanding of the activities of the government, specifically, the requirements for sponsorship of a child or family member under the Central American Minors (CAM) Refugee and Parole Program, and for sponsorship of a CAM parolee in the United States who is seeking to renew their parole period. CAM enables certain children who are nationals of El Salvador, Honduras, and Guatemala to resettle in the U.S. as refugees or to remain temporarily in the U.S. as parolees and thereby to reunite with their parents who are lawfully present in the United States. To be approved for CAM parole or reparole, a CAM applicant must submit Form I-134 and the associated evidence demonstrating that they have a sponsor who will financially support them while they are in the U.S. Understanding the substantive standards and evidentiary requirements for adjudicating sponsors is crucial to IRAP's ability to assist CAM families navigating this process, as well as to provide resources and guidance to other organizations and individuals assisting CAM families. IRAP intends to review the documents and to highlight and summarize important points through its website, CAM listservs, and its social media networks.

Should the agency deny the fee waiver request, IRAP requests to be notified in advance of incurring any costs exceeding \$100.



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EXPEDITED PROCESSING

IRAP requests expedited processing on the grounds submitted below. By submitting this FOIA request, I certify the following statement to be true and correct to the best of my knowledge and belief:

Expedite Request Reason: An urgency to inform the public about actual or alleged Federal government activity, if made by a person primarily engaged in disseminating information.

Expedited processing is necessary under the second circumstance because of the urgency to inform the public about the substantive standard and documentary evidence requirements that sponsors for CAM parole and reparole must satisfy in order to be approved. These standards have direct implications for how quickly such cases can be processed and whether such cases are likely to be approved. The Biden Administration has touted its reopened CAM Program as a central component of its approach to the Latin America region.¹ Nonetheless, only a handful of reopened CAM cases have been adjudicated since the program reopened, and IRAP recently documented problems resulting in extended delays in a CAM report.² Such processing delays threaten to be compounded by recent changes to sponsorship requirements for CAM parole and CAM reparole. The CAM Program no longer permits Resettlement Agencies to submit CAM applicants with Form I-134 at the outset of their application, and rather CAM parole applicants will now have to navigate that process alone if and when they are placed on the parole track. Moreover, in April 2022, USCIS revised Form I-134 and anecdotal evidence suggests that it is now requiring more documentary evidence of sponsors using Requests for Evidence, which results in further processing delays. It is imperative that families understand what substantive standard sponsors must meet and what documentary evidence they must provide to be approved.

IRAP is a non-profit regularly engaged in media advocacy and dissemination of information obtained through FOIA, through publications and know-your-rights materials posted on its website (www.refugeerights.org). For example, IRAP recently released a CAM report, "[More than Words: Making Good on the Promise of the Central American Minors Refugee and Parole Program](#)," which highlights the barriers families face in accessing the CAM Program and reuniting in the United States. IRAP has created a host of other public-facing resources for CAM families and the organizations that assist them, which are available on its website.³

¹ See U.S. Department of State, Press Release, *Restarting the Central American Minors Program* (March 10, 2021) <https://www.state.gov/restarting-the-central-american-minors-program/>; Rafael Bernal, The Hill, *Biden expands program to legally bring Central American minors to US* (Sept. 13, 2021) <https://thehill.com/latino/572040-biden-expands-program-to-legally-bring-central-american-minors-to-us/>.

² Int'l Refugee Assistance Project [IRAP], *Report: One Year Since Biden Expanded Central American Minors Refugee and Parole Program, Delays Keep Families Apart* (Sept. 21, 2022) <https://refugeerights.org/news-resources/report-one-year-since-biden-expanded-central-american-minors-refugee-and-parole-program-delays-keep-families-apart>.

³ IRAP News & Resources, *I want to apply to the CAM Program* (<https://support.iraplegalinfo.org/hc/en-us/articles/4404258709908-I-want-to-apply-for-the-CAM-program>); *I am in the United States now with CAM*



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The records sought will assist IRAP advise its own clients as well as other organizations which IRAP regularly discusses and consults with regarding the CAM Refugee and Parole Program. Obtaining accurate information regarding the adjudication processes and standards of the Form I-134 and other information relevant to the CAM parole process is crucial to IRAP's role as an organization primarily engaged in disseminating information. Without the records sought, countless children, including IRAP clients, remain unable to reunite with their family lawfully present in the United States.

parole status or my status has ended (<https://support.iraplegalinfo.org/hc/en-us/articles/4404258889876-I-am-in-the-United-States-now-with-CAM-parole-status-or-my-status-ended>); Central American Minors (CAM): Restarting Program for Certain Applicants (<https://refugeerights.org/news-resources/central-american-minors-cam-restarting-program-for-certain-applicants>).