

February 9, 2026

Chairperson of the Working Group on Communications
Complaint Procedure Unit
United Nations Human Rights Council Branch
OHCHR-Palais Wilson United Nations Office at Geneva
CH-1211 Geneva 10
Switzerland

**Re: Free Speech For People Statement in Support of
Complaint Submitted by the Dolores Huerta Foundation**

Free Speech For People, a national non-profit non-partisan organization in the United States, writes to support the complaint submitted by the Dolores Huerta Foundation on behalf of U.S. citizens Cary Alvarado, Cristian Cerna, Andrea Velez, and Javier Jimenez to the U.N. Human Rights Council, pursuant to Council Resolution 5/1.

Background

Alvarado, Cerna, Velez, and Jimenez urgently asked the U.N. Human Rights Council to investigate the unlawful and inhumane detention, assault, arrest without due process, and kidnapping of immigrants and U.S. citizens by Customs and Border Protection (CBP) officers, Immigration and Customs Enforcement (ICE) agents, Federal Bureau of Investigation (FBI) agents, Department of Homeland Security (DHS) police agents, and other federal officers. They filed their complaint with the Complaint Procedure Unit of the U.N. Human Rights Council on 22 September 2025.

In the months since the complainants brought their claims to the UNHCR's attention, the United States, under the administration of President Donald Trump and his senior officials, has continued to carry out aggressive and unlawful military-style operations against civilians in California and throughout the country.¹ Federal agents, under direction from the Trump administration, detain people without probable cause, instead targeting people on the basis of their presumed race or ethnicity, their presence in immigrant-rich communities or workplaces, and

¹ Newsom v. Trump, -- F. Supp. 3d --, 2025 WL3533818, at *6 (N.D. Cal. Dec. 10, 2025) (ordering end of National Guard occupation of sites in Los Angeles); Juliana Kim, "Trump Says National Guard Will Soon Go to New Orleans. Here's the Latest," NPR (Dec. 3, 2025), <https://www.npr.org/2025/10/10/nx-s1-5567177/national-guard-map-chicago-california-oregon>.

protesters.² Although the administration has since denied it, White House Deputy Chief of Staff Stephen Miller has confirmed that the administration has set a target of 3,000 immigration arrests per day.³ These operations, raids, and arrests are typically carried out by federal agents who wear masks, are heavily armed in military-style gear, refuse to identify themselves, and do not wear or provide footage from body cams or other methods that might be used by state law enforcement to hold agents accountable for their egregious human rights violations.⁴ Detained individuals are being imprisoned in inhumane conditions, including for extended periods of time in locations without beds, bathrooms, or sufficient food; and in often remote locations where they are deprived of medical assistance, access to counsel, and where they are subject to inhumane conditions of confinement.⁵

² Vasquez Perdomo v. Noem, 790 F. Supp. 3d 850, 886 n. 24, 892-93 (C.D. Cal. 2025) (finding that immigration officers were using four enumerated factors all related to perceptions about the person's race or ethnicity, or about places presumed to be associated with immigrants; and that these factors alone cannot give rise to reasonable suspicion for a stop), *stay granted* Noem v. Vasquez Perdomo, Case No. 25A169, 600 U.S. ___, 2025 WL 2585637 (Sup. Ct. Sept. 8, 2025); Miriam Waldvogel, *Homan claims ICE Officers 'Don't Need Probable Cause' to 'Briefly Detain' People*, THE HILL (July 11, 2025), <https://thehill.com/homenews/administration/5396985-trump-homan-immigration-detainments/>.

³ Josh Gerstein & Kyle Cheney, *Supreme Court Lifts Restrictions on 'Roving' ICE Raids in Los Angeles*, POLITICO (Sept. 8, 2025), <https://www.politico.com/news/2025/09/08/supreme-court-ice-raids-ruling-00550551>.

⁴ See, e.g., Vasquez Perdomo v. Noem, 790 F. Supp. 3d 850, 867 (C.D. Cal. 2025) (detailing the manner in which agents carried out raids in Los Angeles, noting that they “approach suddenly and in large numbers in military style or SWAT clothing, heavily armed with weapons displayed, masked, and with their vest displaying a generic “POLICE” patch (if any display at all)” and that they “often show up masked, without any visible badges or insignia indicating what agency they work for and have refused to identify themselves when asked”), *stay granted*, Noem v. Vasquez Perdomo, Case No. 25A169, 600 U.S. ___, 2025 WL 2585637 (Sup. Ct. Sept. 8, 2025).

⁵ Vasquez Perdomo v. Noem, 790 F. Supp. 3d 850, (C.D. Cal. 2025); See Jon Ossoff, *The Abuse of Pregnant Women and Children in U.S. Immigration Detention*, July 30, 2025, https://www.ossoff.senate.gov/wp-content/uploads/2025/08/250721_Pregnancy_Report_v7.pdf (documenting credible reports of human rights abuses against individuals held in immigration detention in the United States or on U.S. military bases); Meg Anderson, *Private Prisons and Local Jails are Ramping Up as ICE Detention Exceeds Capacity*, NPR (June 4, 2025), <https://www.npr.org/2025/06/04/nx-s1-5417980/private-prisons-and-local-jails-are-ramping-up-as-ice-detention-exceeds-capacity>; Ximena Bustillo, *President Trump Brings Back Practice of Detaining Families Together*, NPR (Mar. 7, 2025), <https://www.npr.org/2025/03/07/g-s1-52674/trump-detention-families>; Gisela Salomon & Kate Payne, *Detained Immigrants At 'Alligator Alcatraz' Say There are Worms in Food and Wastewater on the Floor*, AP NEWS (July 11, 2025), <https://apnews.com/article/alligator-alcatraz-immigration-detainees-florida-cc2fb9e34e760a50e97f13fe59cbf075>; Lori Rozsa, David Ovalle, & Rachel Hatzipanagos, *Inside 'Alligator Alcatraz': Detainees Report Relentless Mosquitos, Limited Water*, WASH. POST (July 17, 2025), <https://www.washingtonpost.com/nation/2025/07/16/alligator-alcatraz-conditions/>.

The facts alleged in the complaint demonstrate “consistent patterns of gross and reliably attested violations of all human rights and all fundamental freedoms occurring” in the United States and warrant investigation by the UNHCR.⁶

Admissibility of the complaint

The complaint is admissible and lays out critical grounds for a rigorous investigation by the UNHCR. While it satisfies all criteria identifies in paragraph 87 of Resolution 5/1, in particular this letter will address and reinforce the complaint’s clear demonstration of admissibility under paragraph 87 subparts (1), (2), and (8), namely that: (1) the complaint relates to a violation of human rights and fundamental freedoms; (2) the complaint is not manifestly politically motivated and its object is consistent with the Charter of the United Nations, the Universal Declaration of Human Rights and other applicable instruments in the fields of human rights law; and (8) Domestic remedies are ineffective and would be unreasonably prolonged.

- a. The complaint relates to a consistent pattern of gross violations of human rights and fundamental freedoms.

The complaint demonstrates that the Trump administration has undertaken a “consistent pattern[] of gross and reliably attested violations” of human rights and fundamental freedoms.⁷

The human rights and fundamental freedoms at issue in the above-referenced complaint are laid out in numerous international instruments, including the Universal Declaration of Human Rights.⁸ Implicated articles include article 5 (“No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment”); article 7 (“All are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation of this Declaration and against any incitement to such discrimination”); article 9 (“No one shall be subjected to arbitrary arrest, detention or exile”); article 14 (“Everyone has the right to seek and to enjoy in other countries asylum from persecution”); article 19 (“Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers”); article 20(1) (“Everyone has the

⁶ U.N. Human Rights Council Resolution 5/1, ¶ 85.

⁷ U.N. Human Rights Council Resolution 5/1, ¶ 85.

⁸ Universal Declaration of Human Rights, *available at* <https://www.un.org/en/about-us/universal-declaration-of-human-rights>.

right to freedom of peaceful assembly and association”); and article 27 (“Everyone has the right freely to participate in the cultural life of the community, to enjoy the arts and to share in scientific advancement and its benefits”). Furthermore, article 2 of the Universal Declaration makes it clear that none of these rights or freedoms can be abrogated on the basis of “race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status.”

The UNHCR has not yet defined “consistent pattern[] of gross and reliably attested violations.” However, the *travaux préparatoires* of its predecessor complaint process, the 1503 procedure, explained that “gross violations” are “violations of civil and political and economic, social and cultural rights, occurring in any part of the world and under any circumstances, including in situations of armed conflict, and breaches of international humanitarian law or threats to peace”; and that “pattern of gross and reliably attested violations of human rights” must “involve[] several victims, and a certain number of breaches spread over a minimum period of time, which are particularly inhuman or degrading in character.”⁹ The UNHCR has confirmed that it would take this definition into account when considering the admissibility of a UNHCR complaint,¹⁰ and that investigation is warranted where “a communication, alone or in combination with other communications, may reveal a consistent pattern of gross and reliably attested violations of human rights if it alleges severe violations of the Universal Declaration of Human Rights repeated on a substantial number of cases.”¹¹

Further clarity of these terms may be gleaned from the United Nation’s approach to their usage in other treaties. For example, in its definition of a similar term in the Convention Against Torture (“A consistent pattern of gross, flagrant or mass violations of human rights”), the Committee Against Torture determined that such a pattern can only be established if the violations have occurred “by or at the instigation of or with the consent or acquiescence of a public official or other person acting in an official capacity.”¹²

The complaint more than demonstrates that these standards have been met. It details first-hand accounts of unlawful, abusive, and racially or ethnically

⁹ U.N. HUMAN RIGHTS COUNCIL, *Frequently Asked Questions: What Events are Considered as Consistent Patterns of Gross Human Rights Violations?*, <https://www.ohchr.org/en/hr-bodies/hrc/complaint-procedure/faq> (last accessed Dec. 16, 2025).

¹⁰ *Id.*

¹¹ *Id.*

¹² Committee Against Torture, General Comment 1, Communications concerning the return of a person to a State where there may be grounds he would be subjected to torture (article 3 in the context of article 22), U.N. Doc. A/53/44, annex IX at 52 (1998), reprinted in *Compilation of General Comments and General Recommendations Adopted by Human Rights Treaties Bodies*, U.N. Doc. HRI/GEN/1/Rev.6 at 279 (2003), available at https://hrlibrary.umn.edu/cat/general_comments/CAT_C1XX_Misc1_1997.html.

motivated assaults, arrests, and detention of citizens and other residents of the United States by federal officers in California, and provides verifiable allegations of mass raids and arrests, during which federal agents are reported to have used unnecessary force and violence and to have operated without due process, all at the behest of the U.S. government under the Trump administration.

Furthermore, the complaint alleged that these operations are part of a consistent pattern of gross violations and that the highest court in the country has cleared a path for this pattern to continue. The complaint showed that the U.S. Supreme Court blocked a lower court ruling that placed reasonable restraints on the Trump administration's use of roaming units of federal agents carrying out racially and ethnically motivated assaults, arrests, and detentions. As a result, U.S. federal agents are free to arrest and detain individuals "based solely on four factors: (1) their apparent race or ethnicity; (2) whether they spoke Spanish or English with an accent; (3) the type of location at which they were found (such as a car wash or a bus stop); and (4) the type of job they appeared to work."¹³

The Supreme Court majority provided no basis for its ruling. However, a concurrence by Justice Kavanaugh indicated not only his approval of these purported bases for arrest and detention, but also his categorical refusal to acknowledge the manner in which federal agents operate. He claimed, without citation to any facts, that officers are only "sometimes mak[ing] brief investigative stops to check the immigration status" and that "[if] the officers learn that the individual they stopped is a U.S. citizen or otherwise lawfully in the United States, they promptly let the individual go."¹⁴ This dismissive summary stands in stark contrast to the detailed and well documented facts laid out by a federal district court, the U.S. Court of Appeals for the Ninth Circuit, and the dissenting Supreme Court justices—facts that align closely with the experiences of the complainants of this UNHCR complaint.¹⁵ In other words, the highest court in the United States was provided with clear allegations that federal officers are violently arresting and detaining individuals for no reason other than their language or accent, their

¹³ *Noem v. Vasquez Perdomo*, Case No. 25A169, 606 U.S. ___, 2025 WL 2585637, at *5 (2025) (Sotomayor, J., dissenting)

¹⁴ *Noem v. Vasquez Perdomo*, Case No. 25A169, 606 U.S. ___, 2025 WL 2585637, at *1 (2025) (Kavanaugh, J., concurring). Justice Kavanaugh further suggests that there is no need to address claims of excessive force because "the Fourth Amendment's reasonableness standard continues to govern the officers' use of force . . . and remedies should be available in federal court," *id.* at *5, without addressing the many barriers that prevent immigrants from accessing the court or the lasting physical and psychological damage caused by state-sponsored violence, and for which courts cannot provide adequate remedy.

¹⁵ See *Vasquez Perdomo v. Noem*, 790 F. Supp. 3d 850 (C.D. Cal. 2025); *Vasquez Perdomo v. Noem*, 148 F. 4th 656, 672, 679-81 (9th Cir. 2025); *Noem v. Vasquez Perdomo*, Case No. 25A169, 600 U.S. ___, 2025 WL 2585637, at *6-8 (Sup. Ct. Sept. 8, 2025) (Sotomayor, J., dissenting).

perceived ethnicity or race, or their presence at locations presumed to be associated with immigrants; and still authorized these agents to continue sending roving bands of agents to undertake lawless, violent stops and arrests in Los Angeles and throughout the country.

For further context, these federal agents are operating with almost no meaningful internal oversight or oversight by other governmental entities. The Trump administration has shut down multiple internal oversight mechanisms.¹⁶ Historically, oversight of ICE and other immigration law enforcement bodies by various U.S. entities, including Congress and the Department of Homeland Security's own Inspector General, have been inadequate and have not led to meaningful or lasting reform.¹⁷ Indeed, ICE has been rewarded with an enormous budget. In 2025, Congress appropriated to ICE \$29.85 billion, an additional \$45 billion for building new immigration detention centers for individuals and families, and a further \$10 billion slush fund for immigration agencies under DHS.¹⁸

It is clear from the complaint alone that immigration officials within and acting on orders by the Trump administration are undertaking “consistent pattern[] of gross and reliably attested violations” of human rights and fundamental freedoms.¹⁹ The egregiousness of these offenses, and the likelihood of the pattern continuing unchecked without intervention, becomes particularly salient when read in the context of the history of ICE and immigration enforcement in the United States.

The complainants approach the UNHCR now because neither the U.S. Supreme Court, nor Congress, nor internal oversight mechanisms are willing or capable of blocking immigration law enforcement under the Trump administration

¹⁶ Vasquez Perdomo v. Noem, 790 F. Supp. 3d 850, 868 (C.D. Cal. 2025).

¹⁷ See, e.g., NATIONAL IMMIGRANT JUSTICE CTR., *Beyond Repair: ICE's Abusive Detention Inspection and Oversight System* (Nov. 2023), https://immigrantjustice.org/sites/default/files/content-type/research-item/documents/2023-11/NIJC-Policy-brief_ICE-detention-inspections_November2023.pdf; DEP'T HOMELAND SECURITY OFFICE OF THE INSPECTOR GENERAL, ICE'S INSPECTIONS AND MONITORING OF DETENTION FACILITIES DO NOT LEAD TO SUSTAINED COMPLIANCE OR SYSTEMIC IMPROVEMENTS, OIG-18-67 (June 26, 2018), <https://www.oig.dhs.gov/sites/default/files/assets/2018-06/OIG-18-67-Jun18.pdf>. For example, Congress requires DHS to release detention and immigration enforcement data to the public, but a 2022 analysis by the Transactional Records Access Clearinghouse (TRAC) at Syracuse University revealed that the data was often riddled with errors, and noted that ICE routinely refuses to release detention data and fights FOIA requests. TRANSACTIONAL RECORDS ACCESS CLEARINGHOUSE, *ICE's Sloppy Public Data Releases Undermine Congress's Transparency Mandate* (Sept. 20, 2022), <https://tracreports.org/reports/696/>; see also Appropriations Act of 2020 (Pub. L. 116-93), §§ 217-18 (Division D); Appropriations Act of 2021 (Pub. L. 116-260), §§ 216-17 (Division F); Appropriations Act of 2022 (Pub. L. 117-103), §§ 217-18 (Division F) (establishing transparency requirements).

¹⁸ Pub. L. 119-21, 139 Stat. 72, §§ 90003(a), 90007, 100052.

¹⁹ U.N. Human Rights Council Resolution 5/1, ¶ 85.

from carrying out systematic and widespread assaults on immigrant-rich communities, on protests, and on cities and states that are represented by elected officials disfavored by the ruling party.

- b. The complaint is not manifestly politically motivated and its object is consistent with the Charter of the United Nations and the Universal Declaration of Human Rights.

The complaint is not politically motivated and is consistent with the Charter of the United Nations and the Universal Declaration of Human Rights. As laid out in detail above and in the complaint itself, complainants seek to affirm their own rights and the rights of Latinos, immigrants, and people of color in the United States; and to establish that mass arrests, raids, and military operations being carried out against civilians in the United States violate international human rights law. They do not seek any investigatory process or outcome that would undermine the rights of anyone else and indeed seek only for assistance in realizing human rights in an equal and just manner for all residents of the United States.

The Trump administration has undertaken politically motivated attacks on a number of cities and states in the United States, including in Los Angeles and elsewhere in California; Washington, D.C.; Portland, Oregon; Chicago, Illinois; and Memphis, Tennessee. Although federal agents are carrying out violent mass arrests throughout the country, he has deployed military troops and large numbers of federal agents to target civilians in these areas, resulting in increased incidents of human rights violations against individuals suspected of being undocumented immigrants or protesters. In doing so, the Trump administration has trampled over U.S. federal laws and constitutional protections that should be afforded to city and state governments to self-govern.²⁰ But it must be emphasized that this is not a two-way street. Neither the complainants nor the California government—nor any government in the cities and states targeted by the Trump administration—seek to

²⁰ See, e.g., *Illinois v. Trump*, 155 F.4th 929, 939 (7th Cir. 2025) (denying federal government’s assertion that it should be entitled to keep deployed troops in Chicago, finding that “[p]olitical opposition is not rebellion” and “[a] protest does not become a rebellion merely because the protestors advocate for myriad legal or policy changes”); *Newsom v. Trump*, -- F. Supp. 3d --, 2025 WL3533818, at *6 (N.D. Cal. Dec. 10, 2025). The administration’s appeal of the *Illinois v. Trump* ruling to the Supreme Court is currently pending, but briefing by states, former high ranking military officials, and former judges emphasize the illegality of Trump’s deployment of troops against civilians within the United States. See, e.g., Response in Opposition to Emergency Motion for Stay Pending Appeal, *Trump v. Illinois*, No. 25A443 (Sup. Ct. Oct. 20, 2025); Brief of *Amici Curiae* Former U.S. Army and Navy Secretaries and Retired Four-Star Admirals and Generals, *Trump v. Illinois*, No. 25A443 (Sup. Ct. Oct. 20, 2025); Brief of the State of California and its Governor as *Amici Curiae* in Support of Respondents, *Trump v. Illinois*, No. 25A443 (Sup. Ct. Oct. 20, 2025); Brief of 24 Former Federal Judges as *Amici Curiae* in Support of Respondents, *Trump v. Illinois*, No. 25A443 (Sup. Ct. Nov. 10, 2025).

undermine the rights afforded to participants in the administration's schemes to commit gross human rights violations against Latinos, immigrants, and people of color throughout the country. In actions, court cases, and in complaint supported by this letter, victims of the administration's widespread human rights violations seek only to vindicate and protect their own rights under U.S. and international law, consistent with the Charter of the United Nations and the Universal Declaration of Human Rights.

c. Domestic remedies are ineffective and would be unreasonably prolonged.

The complaint and this letter address ongoing but thus far futile efforts to prevent the Trump administration from undertaking gross violations of human rights and fundamental freedoms.

The case cited in the complaint is demonstrative of the hurdles that people across the country have faced in challenging gross abuses by the Trump administration. In *Vasquez Perdomo v. Noem*, plaintiffs sought to stop the Trump administration from deploying roving bands of federal agents to harass, detain, and arrest people based solely on factors related to their perceived ethnic identity or language. Plaintiffs won at the district court, and the court of appeals rejected the Trump administration's attempt to stay that ruling.²¹ However, the Supreme Court immediately granted the stay, allowing federal immigration agents to continue to harass, detain, and arrest based solely on racial profiling while the Trump administration appealed the first ruling.²² Appealing any federal court decision is often a lengthy process; the stay therefore may allow these acts to continue for months or years even if the plaintiffs were to ultimately prevail.

This pattern has been replicated elsewhere in the country. U.S. courts are showing vast deference to the Trump administration, even when confronted with manifest violations of federal law. Where plaintiffs succeed before the federal district courts, these rulings have been consistently stayed or overturned either by federal appellate courts or (when appellate courts affirm the district court) by the U.S. Supreme Court. The U.S. Supreme Court has used its "shadow docket" at unprecedented rates to stay lower court rulings, often without providing reasons.²³

²¹ *Vasquez Perdomo v. Noem*, 790 F. Supp. 3d 850 (C.D. Cal. 2025); *Vasquez Perdomo v. Noem*, 148 F. 4th 656, 672, 679-81 (9th Cir. 2025).

²² *Noem v. Vasquez Perdomo*, Case No. 25A169, 600 U.S. ___, 2025 WL 2585637 (Sup. Ct. Sept. 8, 2025).

²³ BRENNAN CENTER, *Supreme Court Shadow Docket Tracker—Challenges to Trump Administration Actions* (updated Dec. 12, 2025), available at <https://www.brennancenter.org/our-work/research-reports/supreme-court-shadow-docket-tracker-challenges-trump-administration> (last accessed Dec. 17, 2025); Jan Wolfe & Nate Raymond, *Judges Vexed by Supreme Court 'Shadow Docket' Rulings in*

Court proceedings are expensive, drawn-out, and thus far have not meaningfully prevented ongoing human rights violations in the United States. Immigrants (or those who suffer assault and detention because they were perceived to be immigrants) rarely have the resources or ability to pursue civil lawsuits arising from excessive force or inhumane detention. Civil complaints are often bogged down with deferential immunity defenses that can take years to resolve before the complainants can even proceed to consideration of the merits of their claims.²⁴ One example is *Ms. L. v. ICE*, a class action suit filed in 2018 that sought injunctive relief pertaining to the separation of parents and children at the southwest border. The case settled only five years later, without financial damages for the victims, and only under the auspices of another administration.²⁵

Conclusion

The complaint discussed herein is a powerful statement on the gross human rights violations currently being undertaken in the United States by federal immigration agents under the auspices of the federal U.S. government. The Human Rights Council should admit the complaint submitted by Cary Alvarado, Cristian Cerna, Andrea Velez, and Javier Jimenez and undertake an investigation of the allegations therein.

Sincerely,

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²⁴ See Jason Tiezzi, Robert McNamara, Elyse Smith Pohl, *Unaccountable*, INST. OF JUSTICE, at 5 (Feb. 7, 2024), available at <https://ij.org/report/unaccountable/> (last accessed Dec. 17, 2025) (finding that qualified immunity lawsuits take on average 3 years and 2 month, 23% longer than typical federal civil suits on appeal).

²⁵ *Ms. L. v. ICE*, Case No. 18-cv-428, Joint Motion for Preliminary Approval of Class Action Settlement, and to Certify Settlement Class (S.D. Cal. Oct. 16, 2023), available at <https://www.justice.gov/archives/opa/file/1319511/dl?inline>; Press Release, U.S. Dep't of Justice, U.S. Government Reaches Settlement in Class Action Family Separation Case Seeking Injunctive Relief (Oct. 16, 2023), available at <https://www.justice.gov/archives/opa/pr/us-government-reaches-settlement-class-action-family-separation-case-seeking-injunctive>.