EXHIBIT F

Declaration of Ry Meyer, Catholic Charities of the Archdiocese of Dubuque

DECLARATION OF RY MEYER

- I, Ry Meyer, pursuant to 28 U.S.C. § 1746, declare as follows:
 - 1. I am an Immigration Attorney employed by Catholic Charities of the Archdiocese of Dubuque's Immigration Legal Services (CCAD ILS). I am an attorney who specializes in immigration law with 11 years of experience as a licensed attorney and 5 years of specialized training and experience in the area of immigration law. I am licensed to practice law in the State of Iowa. The purpose of this declaration is to discuss the ways in which the new illegal reentry law, Senate File 2340, will affect CCAD ILS's immigrant clients and the community we serve.
 - 2. Catholic Charities is a registered nonprofit social service entity in the state of Iowa. The agency was founded in 1931 to address and relieve the suffering of the most vulnerable people in our society.
 - 3. CCAD's mission is to empower communities by reducing poverty and strengthening families. As a religious nonprofit, CCAD is guided by Catholic Social Teachings and the Catholic ethos of outreach to the poor and vulnerable. Our services are available to people of all faiths or no religious faith who live within one of the Archdiocese of Dubuque's thirty counties in northeast Iowa. CCAD ILS offers high-quality affordable legal services from experienced immigration attorneys and Department of Justice accredited legal representative(s) in support of this mission. CCAD ILS services include legal representation and advice generally falling under humanitarian- and family-based immigration assistance, including but not limited to naturalization, adjustment of status, family petitions, removal defense, temporary protected status, special immigrant juvenile status, consular processing, and other services. CCAD ILS offers free legal consultations, during which staff attorneys assess potential clients for eligibility for immigration benefits or protections. CCAD also provides services in addition to immigration legal services, such as affordable housing, case management, mental health counseling, and jail and prison ministry.
 - 4. The first step in assessing an immigrant's eligibility for services starts with a confidential legal consultation, scheduled after initial contact from potential immigrant clients. Many immigrants are eligible for legal pathways to immigration status, such as "U Visas" for victims of crime, "T Visas" for victims of trafficking, "VAWA" protections for victims of domestic/intimate partner or sexual violence, or "Special Immigrant Juvenile" status for minors who have been abandoned, neglected, or abused. Bona fide asylum seekers may be "undocumented." CCAD also serves immigrants who are eligible for "Withholding of Removal" and withholding under the Convention against Torture, which are federal programs that offer protection to immigrants who in some cases may have received an Order of Removal, Deportation, or Denial of Admission prior to filing for these benefits.

- 5. Many potential clients who are in a documented immigration status, and who are eligible for federal immigration protections or benefits, have previously received removal orders but the resulting penalties have expired. Such individuals are often eligible for family-based or humanitarian-based protections and benefits, and therefore eligible for our immigration legal services. Assurance of confidentiality and a meeting free from fear is crucial to consultation, or individuals such as those listed would avoid contact with service providers such as ours out of fear of detainment, punishment, or harassment.
- 6. CCAD ILS currently employs four attorneys and one Department of Justice (DOJ) partially accredited legal representative. Each attorney or legal representative carries a caseload ranging from approximately 80-120 active cases. Each attorney or representative aims to conduct approximately 120 consultations in a year. Approximately over half of these consultations result in offers of representation. The remainder receive referral information recommending they seek other legal counsel.
- 7. The passage of S.F. 2340 directly impedes CCAD ILS's mission to empower communities, reduce poverty, and strengthen families by providing immigration legal services. The law targets immigrants who may be seeking a form of legal immigration relief, protection, or benefit, such as some "U" and "T" Visa applicants, "VAWA" applicants, asylum, withholding or removal, and Special Immigrant Juvenile applicants. The text of this law also targets people who may have a current legal immigration status, such as previously-removed immigrants who have been granted legal status notwithstanding their prior removal orders. The text of this law also targets people who entered the U.S. with authorization or later obtained legal immigration status in a variety of foreseeable circumstances and situations. These types of immigrants, whom CCAD ILS regularly serves with consultations and/or follow-up representation, would be discouraged from seeking services and accessing programs to obtain, stabilize, or renew their legal immigration status. Additionally, immigrants who may not think they are eligible for status will be discouraged from seeking other services. It is particularly important for people without eligibility for immigration relief to be able to access confidential legal consultations with CCAD ILS, so such immigrants receive legal case analysis from an attorney as opposed to making legal assumptions based on rumor, social media, or other non-legal sources.
- 8. Our legal services help immigrants access legal information and benefits, which strengthens the community overall. CCAD ILS seeks to reduce barriers by explaining the complexity of immigration law, not just for immigrants seeking our services but for the general public. We aim to reduce language and cultural barriers to help immigrants overcome fear and stigma by offering affordable legal immigration services. Our program incentivizes compliance with legal behavior and supports the community, economy, and most of all families. Laws such as, and specifically including, S.F. 2340 create fear in immigrant populations, which decreases their willingness to reach out to our organization for assistance. S.F. 2340 already has increased fear for immigrants who have a right to

- seek out legal advice and pursue eligible legal protections. This effect already has impacted CCAD's workflow and services, and CCAD ILS anticipates this effect will increase if the law goes into effect as planned. CCAD ILS cannot serve immigrants and the greater community in our service area if S.F. 2340 causes immigrants to retreat from engagement due to fear of punishment.
- 9. This law negatively affects the clients CCAD ILS serves in several ways. First, S.F. 2340 negatively targets immigrants in the Archdiocese of Dubuque, the population whom CCAD ILS serves, and will impact their ability to access counsel. If this law proceeds to enforcement on July 1st, 2024 as planned, CCAD ILS clients and potential clients will be afraid to show up for their appointments or legal meetings for fear that they could be stopped and arrested under the new law. The consequences are likely to negatively affect families with mixed immigration status, people with legal status, and people eligible for legal status, all of whom are people CCAD serves. These people, among the most vulnerable in our service area, will face significant harm if this law denies them access to legal consultations and representation, separating them from needed legal assistance to stabilize, obtain, and maintain their legal immigration status.
- 10. Second, S.F. 2340 will harm our ministry to serve immigrants in our community, consistent with Catholic principles. Catholic Social Teachings guide our ministry to the poor and most vulnerable in our community. Our calling is to uplift the life and dignity of all people, including immigrants regardless of their immigration status. But SF2340 will exacerbate exploitation, abuse, and family separation for the immigrant communities we serve. Survivors of crime and abuse, such as recipients of U visa, T visa, VAWA, asylum, who have previously been removed from the U.S., are unquestionably among the most vulnerable people in the CCAD service area. They are also often eligible for our services to help them obtain legal immigration status. S.F. 2340 impedes CCAD ILS's ability to provide them services that our organization is qualified and structured to provide. In this way S.F. 2340 also impedes our religious freedom to follow our calling and mission to help the vulnerable and impoverished.
- 11. Third, enactment of S.F. 2340 will create a chilling effect for other services offered to immigrants by our agency such as case management, counseling, and/or affordable housing, exacerbating the harm to vulnerable immigrants in CCAD's service area. If enacted, this law would separate our vulnerable clients from the services we provide, and deprive them of the resources CCAD has allocated to help them. Out of fear of this law and its threat of consequences for being present in the CCAD service area, immigrants would lose access to our service providers, our trained and licensed professionals in mental health, counseling, housing, and case management. They would lose access to our CCAD office facilities, administrative support, and proper supplies and equipment normally available to CCAD staff in our established locations.

12. In summary, S.F. 2340 will negatively impact the immigrant community that CCAD serves and impedes the services our organization is structured to provide. In turn, the law will negatively impact our ability to practice our faith and ministry.

I declare under the penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed at Dubuque, Iowa, on May 08, 2024.

Ry Meyer