



Alternative Chance  
Chans Alternativ



Transnational Legal Clinic



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**Re: Request for Thematic Hearing on Deportations of Haitian Nationals from the United States to Haiti During the 186<sup>th</sup> Period of Sessions of the Inter-American Commission on Human Rights**

Dear Secretary Tania Reneaum Panszi,

The representatives of the undersigned organizations write to respectfully renew our request for a thematic hearing concerning the **Deportation of Haitian Nationals from the United States to Haiti** in conjunction with the upcoming 186<sup>th</sup> Period of Sessions.<sup>1</sup> We seek this hearing in light of the United States' persistence in deporting Haitian nationals, despite full knowledge of the grave risks to life, personal security, health and well-being confronting individuals deported from the United States, and particularly for those whom the Haitian government, with the U.S. government's knowledge and acquiescence, are placing in unlawful detention under life-threatening conditions that fail to meet even the most minimum standards of detention under international law.

- I. **The United States persists in deporting individuals to Haiti despite calls from the international human rights community to ensure the right to non-refoulement for all Haitian nationals for whom the forced**

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<sup>1</sup> This hearing request is made in accordance with Article 64 of the Rules of Procedure for the Inter-American Commission on Human Rights.

**return to Haiti presents grave risk to life, personal security, and health.**

Both the U.N. High Commissioner for Refugees and the UN High Commissioner for Human Rights have called for a cessation of all forced returns to Haiti. On November 3, 2022, the UN High Commissioner for Refugees issued the following [statement](#):

Amid a devastating humanitarian and security crisis in Haiti, UNHCR, the UN Refugee Agency, is today calling on States in the region and beyond to suspend the forced return of Haitians to their country.

Violence, including sexual violence, kidnapping, looting and roadblocks by armed gangs, and the recent outbreak of cholera, has exacerbated an already dramatic humanitarian situation in Haiti, which is marked by acute food insecurity, fuel shortages, and limited health care and sanitation. Millions of children are unable to attend school, are malnourished and live in fear.

As warned by the UN Human Rights Office, the systematic violations of rights and the unremitting armed violence have precipitated the country's descent into its "worst human rights and humanitarian situation in decades."

"Given this very troubling situation, I appeal to all States to stand in solidarity with Haiti and urge them not to return Haitians to a country that is extremely fragile," said High Commissioner for Refugees Filippo Grandi.

Haitian women, children and men who are outside the country and returned to Haiti may face life-threatening security and health risks, and further displacement inside the country.

The forced removal of people to a place where they may face risk of persecution, torture or other serious or irreparable harm would amount to "refoulement," which is explicitly prohibited under international refugee and human rights law. International law also prohibits collective expulsions and arbitrary detention associated with it.

In that same statement, UNHCR called on countries to "ensure that Haitians have access to protection and support services regardless of their reasons for leaving their country. For those not eligible for refugee protection, this may be achieved through granting of complementary protection, temporary protection, humanitarian admission or other legal stay arrangements until the security situation in Haiti permits safe returns." And UNHCR reminded states of their obligation to ensure Haitians seeking international protection "access to fair and efficient asylum procedures."

UN High Commissioner for Human Rights Volker Türk reiterated this call for cessation of all forced returns to Haiti in his November 10, 2022 [statement](#): “Unremitting armed violence and systematic human rights violations in Haiti do not currently allow for the safe, dignified and sustainable return of Haitians to the country. I reiterate my call to all countries in the region ... to halt the deportation of Haitians.”

These calls from the UNHCHR and UNHCR follow on the recognition from this Honorable Commission of the grave human rights violations confronting Haitians in human mobility. On October 24, 2021, the Commission issued Resolution 2/2021, “Protection of Haitians in Human Mobility: Inter-American Solidarity,” in which it noted the “recent exacerbation of the social, political, and institutional crisis, permeated by the grave context of structural poverty, which hinders the effective protection of the human rights of the Haitian population,” and specifically with regard to deportations and other returns of Haitian nationals, the Commission noted, “the Haitian State is facing challenges when it comes to ensuring mechanisms of social inclusion for the returnees, and even for protecting their lives and integrity.” The Commission then set forth detailed recommendations, consistent with its authority under Article 106 of the Charter of the OAS, and in application of Article 41(b) of the American Convention and Article 18(b), which recommendations included the following:

14. In the context of the emergencies and crises faced by Haiti, States should implement coordinated actions to reduce risks and strengthen processes for receiving persons in mobility. Such actions should be guided by the principle of equality and non-discrimination, differentiated treatment, access to protection mechanisms, and the guarantee of nonrefoulement....

....

21. States should guarantee access to their territory and to fair and efficient procedures that guarantee an individualized evaluation of the differentiated protection needs for asylum seekers, refugees, stateless persons, people who require complementary protection, victims of human trafficking, and unaccompanied children or children separated from their families, among others. Public health measures adopted to respond to the COVID-19 pandemic should not result in the denial of an effective opportunity to seek asylum, or some other type of protection, or give rise to the direct or indirect refoulement. Likewise, the procedures that give rise to expulsions or deportations should also be evaluated individually, considering the circumstances of each person.

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24. On evaluating requests for protection from Haitians, the states should consider:

a. granting refugee status under the 1951 Convention relating to the Status of Refugees and/or its 1967 Protocol;

- b. applying the regional definition of refugee from the Cartagena Declaration on Refugees (1984) in keeping with the guidelines set out in Advisory Opinions OC-21/14 and OC25/18 of the Inter-American Court of Human Rights, domestic legislation, or state practice, as the case may be. To this end, consideration should be given to the humanitarian situation prevailing in the country and the serious impact on public order;
- c. granting complementary forms of protection, based on their domestic legislation or by direct application of the applicable international human rights treaties; or
- d. adopting and implementing special regularization programs, or granting facilities for obtaining immigration statutes provided for in the domestic legislation, for humanitarian reasons, family reunification, or other criteria.

25. The protection procedures should not discriminate based on nationality, color, race, gender, language, religion, political opinion, social origin, or any other condition. In addition, such mechanisms should observe certain minimal guarantees that derive directly from the principle of non-refoulement as a peremptory norm of international law (*jus cogens*).<sup>2</sup>

The Commission's Resolution followed a Press Release in which the Commission and the UN Special Rapporteur on the Human Rights of Migrants condemned the excessive use of force and deportations of migrants at the southern border and expressed particular concern about the treatment of Haitian migrants in Del Rio, Texas in September 2021. In that joint release, the Commission and UN Rapporteur stressed the United States' obligations to conduct individualized assessments of the protection needs of those subjected to possible deportation and urged the United States to "ensure the minimum standards for human safety and due process that are necessary to process and acknowledge the protection needs of all mobile individuals."<sup>3</sup> The United States has failed to heed this call.

While a federal court order has temporarily ceased the forcible removals of Haitians and other migrants at the southern border subject to Title 42 expulsions, the United States persists in the deportation of Haitian nationals in direct contravention of its obligations of non-refoulement from within the United States. These deportations particularly impact those individuals who are ineligible for Temporary Protected Status, primarily because of past criminal convictions or criminal charges. Furthermore, the

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<sup>2</sup> Inter-American Commission on Human Rights, Res. No. 2/2021, "Protection of Haitians in Human Mobility: Inter-American Solidarity" (Adopted by the IACHR on October 24, 2021), <https://www.oas.org/en/iachr/decisions/pdf/2021/Res-2-21-en.pdf>.

<sup>3</sup> Inter-American Commission on Human Rights, Press Release, "IACHR and UN's Special Rapporteur Condemn Excessive Use of Force and Deportations of Migrants from Haiti at the United States' Southern Border" (October 4, 2021), [http://www.oas.org/en/iachr/jsForm/?File=/en/iachr/media\\_center/preleases/2021/260.asp](http://www.oas.org/en/iachr/jsForm/?File=/en/iachr/media_center/preleases/2021/260.asp).

United States has filed its notice of appeal challenging the federal court’s ruling that Title 42 expulsions are illegal and ordering the immediate suspension of all Title 42 expulsion, leaving open the possibility of future collective expulsions with a disproportionate impact on Haitians.<sup>4</sup>

Of further concern are recent announcements that the United States is currently considering renewing its policy from the early 1990s of interdicting Haitians fleeing the island nation on boats and detaining them at the Guantanamo Bay Naval Base for off-shore processing.<sup>5</sup> The Naval Base has historically been used by the U.S. government to hold migrants intercepted at sea by the U.S. Coast Guard in its Migrant Operation Center (“MOC”). The MOC is jointly overseen by the Department of Homeland Security, the Department of Defense, and the State Department. Immigration and Customs Enforcement manages the search for guard and other contractor services. Recent reports indicate that the US government has begun making efforts to expand the capacity of the Guantánamo MOC to hold up to 400 people at a time. Further, the Department of Homeland Security has requested that the Department of Defense be prepared — within 48 hours of being called on — to set up tents to accommodate up to 1,000 Haitians on the base.<sup>6</sup>

The United States has a long and troubled history with regard to its use of Guantánamo for off-shore detention and processing of Haitian migrants. Successive U.S. governments have attempted to deter Haitian people from accessing asylum in the U.S. through the targeted application of policies designed to intercept, detain and remove them through tactics including unlawful pushbacks at sea, mass detention, torture and abuse, and expedited removal proceedings resulting in categorical denials of protection,

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<sup>4</sup> Priscilla Alvarez, “Biden administration appeals court decision that blocked the Trump-era policy that let the US turn away migrants at the southern border,” CNN (Dec. 7, 2022), <https://www.cnn.com/2022/12/07/politics/title-42-appeal-border-appeal/index.html>. See also, <https://www.documentcloud.org/documents/23389489-notice-on-intention-to-appeal-title-42-ruling-from-biden-admin> (indicating the US government’s intent to move the D.C. Circuit to hold the appeal in abeyance pending (1) the Fifth Circuit’s decision in Louisiana v. CDC, No. 22-30303 (5<sup>th</sup> Cir.), the government’s appeal of the preliminary injunction enjoining implementation of CDC’s April 1, 2022 Termination Order; and (2) the forthcoming rulemaking to replace Section 71.40.). See <https://quixote.org/wp-content/uploads/2021/03/The-Invisible-Wall.pdf> for a discussion of the impact of Title 42 on Haitian migrants.

<sup>5</sup> See [DHS seeks contractor to run migrant detention facility at Gitmo, guards who speak Haitian Creole \(nbcnews.com\)](https://www.nbcnews.com/news/immigration/possible-surge-haitian-migrants-ahead-biden-admin-weighs-holding-third-rcna54610). Government records indicate that the Biden Administration is seeking a new contract to operate a migrant detention facility at the Guantánamo Bay naval base, “with a requirement that some of the guards speak Spanish and Haitian Creole.”). See also, <https://www.nbcnews.com/news/immigration/possible-surge-haitian-migrants-ahead-biden-admin-weighs-holding-third-rcna54610> (According to a document obtained by NBC News “The White House National Security Council is asking the Department of Homeland Security what number of Haitian migrants would require the U.S. to designate a third country, known as a “lily pad,” to hold and process Haitian migrants who are intercepted at sea and what number would overwhelm a lily pad country and require Haitians to be taken to Guantánamo.”).

<sup>6</sup> Staf W. Kight, “Biden eyes expanded Guantanamo migrant center as Haiti crisis deepens,” AXIOS.com (Nov. 17, 2022), <https://www.axios.com/2022/11/17/biden-haiti-migrant-crisis-guantanamo-bay>.

regardless of an individual's circumstances.<sup>7</sup> And the Guantánamo MOC – which the United States has consistently argued operates outside the territorial jurisdiction of the United States, and by extension outside the reach of its international human rights obligations – has repeatedly been used by the U.S. government as part of its policy and practice of denying protection to Haitian migrants. At the very least, the possible use of Guantánamo for off-shore processing of Haitian migrants would stand in direct violation of UNHCR's call for ensuring due process and full and equal access to persons from Haiti seeking international protection, and the Commission's call for States to “guarantee access to their territory and to fair and efficient procedures that guarantee an individualized evaluation of the differentiated protection needs for asylum seekers, refugees, stateless persons, people who require complementary protection, victims of human trafficking, and unaccompanied children or children separated from their families, among others,” as well as its call for equality and non-discrimination.<sup>8</sup>

## **II. The United States persists in deporting individuals to Haiti despite knowledge of the life-threatening conditions of detention confronting those who are automatically subjected to unlawful detention by the Haitian government upon debarking the deportation flights**

While the United States has recently redesignated Haitian nationals as eligible for Temporary Protected Status, those with even minor criminal convictions – and even those charged, but not convicted of crimes, are categorically excluded from this form of protection from deportation. The exclusion of persons with criminal records has again reached a crisis point, in light of recent reports that Haiti has resumed its prior practice – illegal under Haitian law – of automatically detaining individuals who have been returned with criminal records in the National Penitentiary and other jails.

As we noted in our most recent thematic hearing request,<sup>9</sup> the case of Patrick Julney provided one such example. According to a report in [northjersey.com](https://www.northjersey.com), Mr. Julney, who was brought to the United States as a toddler and does not speak Haitian Creole, was immediately imprisoned in Port-au-Prince after disembarking the plane in Haiti in June 2022, and was held at the Delmas 33 detention center and then the National Penitentiary for ransom (set at \$6,000) alongside two other individuals deported from the United States.<sup>10</sup> Michelle Karshan, executive director of Alternative Chance, which has provided assistance to Mr. Julney and others deported with criminal convictions, noted that the practice, which had largely ceased in 2012 or 2013, has resumed in the past eight to ten months. Ms. Karshan is aware of at least 30 Haitians deported from the United

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<sup>7</sup> <https://www.amnesty.org/en/documents/amr36/5973/2022/en/>

<sup>8</sup> Inter-American Commission on Human Rights, Res. No. 2/2021, “Protection of Haitians in Human Mobility: Inter-American Solidarity” (Adopted by the IACHR on October 24, 2021), <https://www.oas.org/en/iachr/decisions/pdf/2021/Res-2-21-en.pdf>.

<sup>9</sup> [https://www.ijdh.org/wp-content/uploads/2022/08/2022.08.15\\_Haitian-Deportations-Hrg-Req-US\\_185th-CIDH-POS.pdf](https://www.ijdh.org/wp-content/uploads/2022/08/2022.08.15_Haitian-Deportations-Hrg-Req-US_185th-CIDH-POS.pdf).

<sup>10</sup> Hannan Adely, “‘Being held for ransom’: Deported NJ man now jailed in notorious Haitian prison,” NorthJersey.com (July 20, 2022), <https://www.northjersey.com/story/news/2022/07/20/american-deportees-ransom-prison-haiti-ice-detainees-patrick-julney/65370742007/>.



States this year who have been held for ransom in Haiti's squalid prisons upon arrival, though she estimates that the numbers are higher. Despite being aware of this practice, and despite having been made aware of the conditions in detention that confront those deported from the United States, the United States has persisted in deportations to Haiti particularly of those with criminal convictions or charges, resulting in at least one death of a man illegally detained in the Haitian federal penitentiary of cholera-like symptoms.

In the time since our last hearing request, on October 10, 2022, Roody Fogg, a 40-year-old Haitian national, who had lived in the U.S. since the age of 12, died a preventable death from cholera-like symptoms and egregious conditions in the National Penitentiary. Mr. Fogg was deported to Haiti on April 5, 2022, after being a green card holder and living in the U.S. most of his life. Immediately upon arrival in Haiti, Mr. Fogg and others from the deportation flight were apprehended by the General Directorate of the Haitian National Police (DGPNH) and imprisoned. His case is reminiscent of that of Wildrick T. Guerrier, who over 11 years ago, fell ill and died at the age of 34 as a direct result of conditions in the jail. As detailed in a pending merits petition and previously granted Precautionary Measures,<sup>11</sup> the United States deported people to Haiti in the aftermath of the devastating 2010 earthquake, knowing that they would be jailed in life-threatening conditions upon their arrival. There was no place to sleep in the jail cell and it was so overcrowded that there was not enough space for people to lie down all at once. The mosquito-infested cells were covered with dirt, feces, vomit, and blood and had no food, functional toilet, or water for drinking or bathing.

The extreme nature of the prison and jail conditions in Haiti persist to this day and cannot be over-stated. According to our sources, 42 men died of cholera in the National Penitentiary on October 25, 2022, and nine more died on October 26, 2022. Another source reported from the prison that "almost every day, somebody is dying in here. At night, you hear the gates banging. People pass out. Last night, it was a couple of people. They were sick real bad and I don't know if they died or not." In the prisons, detained individuals are denied basic necessities, including adequate living conditions food, water, and medical supplies. These individuals are held like animals as they are forced to live in cramped 15-foot by 20-foot cells that were meant to hold ten to fifteen inmates, but instead hold upwards of sixty-seven individuals. Cells lack space to lay down, and as a result, detained people are forced to sleep standing or sitting up. Videos sent to us from the Haitian jails show the sleeping arrangements where people were practically stacked on top of each other.

In addition to the overcrowded prison conditions, detained individuals' cells are infested with cockroaches and rats that run over their bodies, faces, food, and water as

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<sup>11</sup> See Mathurin et al. v. U.S., P-191/14, currently pending at the Admissibility Phase before the Commission (while several of the organizations represented herein are representatives in the pending petition, this hearing request is being made independent of the pending Petition to highlight the urgent and immediate situation facing Haitian nationals subject to deportation and exclusion from the United States); Matter of Gary Resil et al. regarding the United States of America, PM 5-11 (March 2, 2016), <https://www.oas.org/en/iachr/decisions/pdf/2016/MC5-11-En.pdf>.

they sleep. Deported individuals in jails also report people's fingers being bitten by rats while they slept, severe beatings by guards, and experiencing chronic diarrhea. Moreover, the only water available in the prisons sits stagnantly in an uncovered five-gallon drum in their cells. This water is used both for drinking and bathing. The imprisoned individuals report having to remove two to four dead rats from the bucket every day.

Extreme hunger is rampant in Haitian prisons. Ms. Karshan, who works with individuals deported to Haiti with past criminal records, reports that many of those who are detained are so emaciated that they evoke images of some of the twentieth century's most horrific human rights abuses, including victims of concentration camps in the Holocaust. Detained people are provided no meals or just one substandard meal daily, unless they are fortunate enough to have a family outside the prison provide them with more food. Moreover, the prison's food is usually contaminated from rats which infest the kitchen.

Haitian prison officials are also withholding medical care from detained individuals. In an emailed statement, Mr. Fogg's mother said: "There was no medical care for him when he was sick. If there was medicine, he wouldn't have died ... There, it's like they threw him in a corner." After speaking with Mr. Fogg's cellmates, the managing attorney with Capital Area Immigrants' Rights Coalition, Eleni Bakst, uncovered that Mr. Fogg suffered diarrhea and vomiting until he felt he could not stand anymore and "saw black." His cellmates showered him and called for help, but they told Ms. Bakst he never saw a doctor or received medication. Further, due to a lack of medical supplies, another deported individual reported that he has not been able to take his asthma or blood pressure medicine. This man's wife "lives in fear every day" and every night she goes to sleep "not knowing if he's OK."

Deported individuals are the targets of state violence inside and outside of prison in Haiti. A deported individual in jail reported that while protesting the jail conditions, people had to cover their faces because the prison guards shot tear gas at them. Moreover, the guards threatened to kill them, saying that individuals deported to Haiti with past criminal records are "messing up their country." Guards used this justification for inflicting violence against them. In addition to tear gassing, detained men report beatings and other forms of physical violence.

While some of the detained individuals with whom we are in touch have since been released because of pressure from families, activists, and media coverage regarding their illegal detention, activist pressure for each detained individual is not possible; individual campaigns are not a sustainable form of long-term protection against the systemic rights abuses facing Haitian deportees; and it appears that jailing of newly deported individuals may continue and/or could resume at any moment. Furthermore, even those not facing detention confront significant threats to their basic right to life and personal security, as highlighted in the OHCHR's and UNHCR's respective statements calling for cessation of all forced returns to Haiti.



### **III. Discrimination and Lack of Due Process Pervades the U.S. System of Immigration Enforcement**

Individuals deported to Haiti from the United States face grave, imminent threats to their human rights to life and liberty. But even prior to their forcible return to Haiti, they suffer from other serious human rights abuses at the hands of U.S. immigration authorities, including pervasive discrimination on the basis of race and national origin, and denial of due process during evaluations of their claims for humanitarian protection.

The case of Paul Pierrilus serves as just one example of the ways in which the U.S. fails to ensure equality and non-discrimination in its enforcement of immigration laws and fails to ensure full due process aimed at protecting the fundamental human rights of migrants of Haitian nationality. Mr. Paul Pierrilus was born to Haitian parents while living in St. Martin, and then was brought to the United States when he was five years old. He never obtained Haitian citizenship, nor did St. Martin confer citizenship on him. In 2004, the U.S. initiated deportation proceedings against him because of a criminal conviction for sale of a controlled substance. Despite his best efforts, including efforts to show that he did not have citizenship in Haiti, a final order of deportation was entered against him. Although a final order of removal was entered against Mr. Pierrilus, on or about July 31, 2006, he was granted an Order of Supervision by Immigration and Customs Enforcement (ICE). In order to be granted an Order of Supervision (OSUP), ICE had to make the determination that Mr. Pierrilus was neither a danger to the community nor a flight risk. The grant of an OSUP by ICE also confers the right to apply for a work authorization document (EAD) which Mr. Pierrilus did that permitted him to then obtain employment.

As part of the OSUP, Mr. Pierrilus was required to regularly check-in with ICE at their offices in New York City. Upon information and belief, Mr. Pierrilus complied with all ICE appointments and did not violate any provision of his OSUP. Then without any explanation or prior notice or warning or an opportunity to defend, Mr. Pierrilus was detained by ICE at a regularly scheduled check-in pursuant to his OSUP at ICE's New York City field office. In January 2021, immediately before the inauguration of the Biden Administration, after a brief period of detention in New York, Mr. Pierrilus was taken to Louisiana to be placed on a deportation flight to Haiti. Last minute efforts and Congressional intervention temporarily halted his deportation. But on February 2, 2022, following the Biden Administration's stated commitment to halt all deportations in the first 100 days of his Administration, the United States deported Mr. Pierrilus to Haiti, despite ongoing attestations from the Haitian Ambassador to the U.S. that he is not a Haitian citizen. Since that date, Mr. Pierrilus has lived in hiding and fears for his life. He is trying desperately – with the help of lawyers in the United States – to find a way back to his family and to safety following his illegal deportation to a country he had never known.

### **IV. Conclusion**


In consideration of the aforementioned reasons, we respectfully reiterate our request for a thematic hearing to address the grave and life-threatening human rights violations caused by the United States' persistence in deporting Haitian nationals. We seek this hearing as an opportunity to address in greater detail the situation confronting Haitian nationals upon their forced return from the United States, and to address steps the United States can and must take to ensure compliance with its international human rights obligations. Specifically, we seek this opportunity to engage in dialogue with the Commission and the United States on the following recommendations:

- (1) Immediately cease all deportations to Haiti.
- (2) Take all measures to ensure the immediate release of all Haitians removed by the United States who are being held in the Haitian National Penitentiary and other prisons or police station holding cells.
- (3) Take all measures to ensure due process and full and equal access to the asylum system and other forms of complementary protection, including, but not limited to ensuring access to high quality Haitian Creole interpreters and access to legal presentation, including as necessary fear screenings for all Haitians at risk of return as a key protection against refoulement.
- (4) Refrain from placing asylum seekers and other migrants seeking international protection in detention, and instead use proven community-based case support programs for those that need them.
- (5) End discriminatory mistreatment of Haitian asylum seekers and migrants, investigate abuses committed against Haitian nationals, and bring those responsible for abusive actions to justice.
- (6) Ensure consistent enforcement of rules for frontline officials, including law enforcement officials, immigration authorities and asylum officials forbidding racial profiling, and ensuring robust systems of monitoring and access to effective remedy for victims.
- (7) Take steps to address racist and xenophobic attitudes and behavior towards non-citizens, or stigmatization based on race, color, descent or national origin by politicians, the media and wider society, as required by international law, for example, by implementing public anti-discrimination campaigns.
- (8) Create long-term policies that support Haitian-led solutions based on the effective participation of Haitian civil society in the process of creating a more equitable Haiti where Haitians will feel less pressures to flee the country.

Request for Thematic Hearing on Deportations of Haitian Nationals (United States)  
186<sup>th</sup> Period of Sessions

We appreciate the Commission's ongoing interest in this issue and thank you for considering our request.

Respectfully submitted,



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