

Restoring Due Process in Ramsey County/Saint Paul:

SAFE Network Annual Report (March 1, 2021 – April 30, 2022)

July 2022

The Advancing Universal Representation Initiative is driving a national movement for universal representation for immigrants facing detention and deportation.¹ Universal representation advances a public defender system for people facing deportation, one in which every person is represented by a lawyer regardless of income, race, national origin, or history with the criminal justice system. Within this movement, Vera has established the SAFE (Safety & Fairness for Everyone) Network—of which Ramsey County/Saint Paul is a partner—a unique collaboration of government leaders, legal service providers, and community-based advocates all working with Vera to stand up and grow publicly funded, legal representation programs at state and local levels.²

The obstacles facing unrepresented immigrants are substantial. Immigrants facing deportation do not have the right to a public defender if they cannot afford a lawyer. Yet, the government trying to deport them always has counsel. Immigration law is among the most complex areas of American law—it has been described by federal courts as “labyrinthine,” and one former immigration judge said that an immigration case “often involves life and death consequences [that] amount to death penalty cases heard in traffic court settings.”³ Immigrants in detention, like those served by the Ramsey County/Saint Paul SAFE program, are particularly defenseless—detained immigrants are at an increased risk of contracting COVID-19, the least likely to secure representation, and the most vulnerable to deportation.⁴ The loss of liberty and free movement that characterize detention introduce additional obstacles into the already daunting process of an individual trying to represent themselves effectively. Especially amid the current COVID-19 public health crisis, the stakes for immigrants in detention could not be higher.

As a result, most people fighting for their lives in immigration court—including about 70 percent of people in detention nationwide—navigate the complexities of immigration law alone.⁵ At the Fort Snelling Immigration Court, which hears the cases of SAFE’s Ramsey County/Saint Paul clients, 47 percent have gone unrepresented over the last five years.⁶ Over the past 20 years, this number is even starker, with most cases (52 percent) in the Fort Snelling Immigration Court lacking representation.⁷ In response, communities like Ramsey County and Saint Paul are advancing universal representation through the SAFE Network and are leading the way toward increasing fundamental fairness and dignity for everyone facing deportation. While representation alone cannot end the entrenched harm of an unfair immigration system, universal representation programs can mitigate the dehumanizing experience of detention and immigration court and give people a fighting chance to return home to their families in the United States.

Figure 1. Map of the SAFE Network

Safety and Fairness for Everyone (SAFE) Network

Alameda Co., CA
Long Beach, CA
Oakland, CA
Sacramento, CA
Santa Ana, CA
California Collaborative for Immigrant
Justice (San Francisco), CA
Denver, CO
Connecticut Coalition for Immigrant Freedom, CT
Atlanta, GA
Chicago, IL
Cook Co., IL
Baltimore, MD
Prince George's Co., MD
Ramsey Co., MN
St. Paul, MN
Columbus, OH
Philadelphia, PA
Austin, TX
Dallas, TX
Harris Co., TX
San Antonio, TX
Dane Co., WI
Madison, WI



I. Background

The Ramsey County – Saint Paul SAFE program

Ramsey County and the City of Saint Paul joined the SAFE Network after the County and City allocated \$100,000 and \$50,000 of public funds, respectively, to establish a universal representation program, which began services in March 2020. In the program's inaugural year, three legal service providers—Immigrant Law Center of Minnesota (ILCM), The Advocates for Human Rights (Advocates), and Mid-Minnesota Legal Aid (MMLA), altogether referred to as the Providers—were awarded an additional \$100,000 in matching catalyst funds from Vera to support the start of services. Over the past two years, the Providers have demonstrated how legal representation in tandem with Ramsey County's wraparound services program safeguards due process for people facing deportation, promotes safety and freedom from dangerous detention conditions, and fosters family unity and community stability. Still, the Providers' capacity is limited; thousands of people, including non-residents, appearing before the Fort Snelling Immigration Court remain unrepresented.⁸

Due to the Providers' collaborative infrastructure and holistic programming, clients are able to take advantage of essential language access support, mental health assessments, post-release services, and other wraparound social services referrals through the Wilder Foundation. In addition to representing 27 clients, the Providers have conducted virtual intakes and consultations for a many more people in detention, not limited to Ramsey County residents. Of their 27 clients, 24 (89 percent) are residents of Saint Paul.⁹

Under the universal representation model, the Providers have engaged in creative, zealous, and person-centered advocacy, which has served clients who otherwise would not have had access to crucial legal representation. Further, by funding SAFE and other complementary programs, Ramsey County and the City of Saint Paul—whose representatives have consistently called for the protection of their immigrant communities in bold ways—reflect the localities’ commitment to immigrant justice.

Figure 2. SAFE Initiative Program Description

Legal Service Providers:	Advocates for Human Rights; Immigrant Law Center of Minnesota; Mid-Minnesota Legal Aid
Community Partner:	Release MN8
Populations Served:	Ramsey County/Saint Paul residents facing removal or those with close ties to Ramsey County/Saint Paul, with a priority for serving those who are detained
Detention Centers Served:	Sherburne County Jail (Elk River, MN); Carver County Jail (Chaska, MN); Freeborn County Jail (Albert Lea, MN); Kandiyohi County Jail (Willmar, MN)
Method of Identifying Clients:	Virtual intakes and Know Your Rights presentations at Sherburne, Carver, Freeborn, and Kandiyohi County jails, and Minnesota state correctional facilities; Providers’ Detention Hotline; referrals from the community

Year 2 of Legal Services in SAFE

The Providers began their work under this program at the start of the COVID-19 pandemic, which created heightened safety risks for people arrested and detained by Immigration and Customs Enforcement (ICE), led to several unanticipated shifts in ICE enforcement, disrupted communication channels between clients and their counsel, and exacerbated mental health challenges. The Year 1 Report provides more detail about the impact of COVID on people in detention and their representation, and many of these challenges persist. The Fort Snelling Immigration Court began changing or cancelling court hearing dates with little to no advanced notice to the Providers, which has made it difficult for the legal team to prepare their clients’ cases and anticipate future capacity and created “short matter dockets” to move certain cases through in a more expedited manner.

Despite these challenges, the Providers have worked creatively and collaboratively with all partners as well as with the court and detention facilities directly to ensure that eligible clients, including those with serious health concerns requiring additional legal protections, are properly provided counsel, and provided high-quality representation. For example, Providers more recently coordinated with the Sherburne County Jail to allow attorneys greater access to their clients through a video-teleconferencing system that was not previously as accessible. Nonetheless, client access and confidential communication remain outstanding issues throughout the country because of pandemic protocols limiting visitation to detention centers.

In the second year of the program, the Providers have continued to refine their referral, intake, and communication systems to provide more efficient and effective coordination and referrals between the organizations. They have also adapted to the continuously changing landscape of immigration detention, looking

for ways to be flexible in leveraging the program resources to serve those who are currently most impacted by detention and deportation. For example, as the court shifted its focus to hearing cases related to the Institutionalized Hearing Program (IHP), which permits the Department of Homeland Security (DHS) to initiate removal proceedings against people who are in Minnesota state criminal custody, the Providers adapted by gaining significant experience and expertise in serving this population – an important development considering the grave due process concerns associated with the IHP and lack of prior representation resources in this area.¹⁰

Another major success of this program includes the holistic social services support afforded by the County's wraparound services program as well as the Providers' own initiative in building strong relationships with grassroots organizations. These groups include the Black Immigrant Collective, Conversations with Friends, The Minnesota Freedom Fund, the Immigration Court Observation Project, and the Mayflower United Church of Christ. Many of these organizations support clients financially and provide a social network to remain connected to the community while a person is detained. They also provide transportation, temporary housing, and other re-integration support after a client is released from ICE detention.

RECOMMENDATIONS

As the program moves into its third year, it can build upon its strong foundation and success by continuing to expand to help build a sustainable long-term program and meet the unmet need locally. This includes:

- **Creating predictable and sustainable funding streams:** As the County and City continue this work, Vera strongly encourages that both jurisdictions increase their allocations to help meet unmet need for services and create stable and predictable funding streams to promote program sustainability. The need for this was demonstrated in 2021, when an 8-month funding gap prevented the Providers from accepting new clients, leaving seven detained residents without legal representation during that time. Stable and predictable funding supports strong programming by 1) ensuring continuity of zealous representation for cases that take more than one year to conclude, including people who have been released and those who may face prolonged detention beyond the initial contract year, and 2) strengthening the quality of representation by allowing Providers to proactively hire to build capacity and attract strong candidates with a commitment of ongoing job security.
- **Expanding the impact of the program by addressing program gaps and meeting unmet need:** While the program has made an incredible impact in serving detained residents with the resources that have been invested in the program, there continue to be many people who face detention and/or deportation without an attorney to represent them, including people in detention who do not qualify for the program because they are not Ramsey County residents and people facing deportation from outside of detention. For people in detention, Providers report that they continue to see people in detention locally who do not qualify for the program because of their residency. In fact, 80 percent of the detained individuals' cases heard in the Fort Snelling Immigration Court have gone/are unrepresented.¹¹ This need could begin to be addressed by the program relaxing its residency requirement – as some jurisdictions have done – or expanding the capacity to serve this population through partnerships with neighboring jurisdictions or the state.

Additionally, increased funding investments would help the program expand to serve people on the non-detained docket who are fighting deportation from outside of detention. Of the 4,723 cases heard in Fort Snelling with Ramsey County zip codes (as listed in court records), 39 percent of

people's cases are unrepresented.¹² And of the 221 cases that were filed by DHS in the 90 days preceding the end of May 2022, only 28 Ramsey County residents have secured representation, which translates to a 12.7 percent representation rate.¹³ Expanding the program to serve the non-detained population could help ensure that true universal representation becomes a reality in the state of Minnesota.

II. SAFE by the Numbers

The statistics in this report cover clients represented under the Ramsey County/Saint Paul SAFE program from March 1, 2020 (the beginning of data collection in Ramsey County/Saint Paul) to April 30, 2022.¹⁴ These statistics should be considered preliminary, based on just two years of data and a limited sample size.

Leveling the playing field

By advancing the universal representation model, Ramsey County/Saint Paul and the Providers help to ensure that everyone has an equal chance of being represented by an attorney, regardless of their background.

- > As of April 30, 2022, the Providers have represented **27 clients**, helping to level the playing field for immigrants who otherwise would have gone to court alone.
- > The 27 clients represented in Ramsey County/Saint Paul hail from 12 countries—primarily Burma (22 percent) and Mexico (22 percent), followed by Laos (11 percent). The remaining clients are from Liberia, Somalia, Cameroon, El Salvador, Ethiopia, the Gambia, Guatemala, Thailand, and Malaysia. Universal representation helps ensure that people from diverse backgrounds are equally eligible for representation and given the opportunity to have a fair day in court.

Ramsey County/Saint Paul clients as community members

SAFE clients and their families are part of the fabric of Ramsey County/Saint Paul communities.

Representation through SAFE has radiating impacts that extend beyond those directly represented.

- > Like the nationwide trend in the SAFE Initiative, the 27 clients represented in Ramsey County/Saint Paul have had longstanding ties to the United States.¹⁵ On average, clients have **lived in the United States for 16 years**; 26 percent of clients have lived in the country for more than 20 years.
- > Many clients first came to the United States as children or young adults. Seventy percent of clients arrived before their 25th birthday and 44 percent arrived when they were 18 or younger.
- > A third (33 percent) of Ramsey County/Saint Paul's SAFE clients are parents and 37 percent have spouses living in the United States. Collectively, Ramsey County/Saint Paul clients are **parents to 29 children under the age of 18** living in the United States, almost all of whom are U.S. citizens (93 percent).
- > **Fifty-eight percent of clients are the "breadwinners,"** responsible for at least half of their family's income.

The road to freedom

Representation through the SAFE program in Ramsey County/Saint Paul helps people secure release from detention and reunite with their families and communities.

- > Since the inception of the program, **24 percent of clients whose cases began in detention were released** from custody, either on bond/parole or at the conclusion of their legal cases.
- > People in immigration court face steep costs to obtain release from custody, even if granted bond. For Ramsey County/Saint Paul clients granted bond, the average bond amount was approximately \$22,500, although bonds were set as high as \$25,000. On average, Ramsey County/Saint Paul clients were asked to pay 75 percent of their annual household incomes in exchange for the right to fight their cases from outside of custody.¹⁶
- > Attorneys support continued appearance in immigration court. **All Ramsey County/Saint Paul clients released from custody have continued to appear for their scheduled court hearings**, underscoring the senselessness of civil detention.¹⁷

"It feels great to win my appeal. It feels great to be with my family. I am relieved I don't have to be away from them. I was really lucky to have a lawyer help me with my appeal. I am grateful I had a lawyer because I don't think I would have won my case without one. I am lucky that I am with my family and can go back to normal."

- Tin*

Client of Ramsey County/Saint Paul Program

The impact of due process on case outcomes

Representation ensures that clients have a chance to advance a defense and that an immigration judge can evaluate the merits of their cases.

- > Over the course of the first two years, 52 percent of Ramsey County/Saint Paul SAFE clients' cases have completed in immigration court. Although the immigration court backlog has now surpassed one million cases nationwide, cases involving people who are detained move quickly.¹⁸ If attorneys do not intervene quickly, cases could end with people being deported without any opportunity for legal access.
- > **In the last two years, more than half of Ramsey County/Saint Paul SAFE program clients (52 percent), have pursued some legal defense against deportation, all of which relate to pursuing protection-based claims for relief, such as asylum.** Several of these cases remain pending. Of those who are not pursuing any form of defense, all have reviewed their options thoroughly and most have either exhausted their legal options or made informed decisions with the help of the program's legal counsel. Others may be preparing applications that have not yet been filed.
- > Twenty-six percent of Ramsey County/Saint Paul SAFE clients' cases remain pending, making it too soon to meaningfully estimate outcomes for all clients. These pending cases include clients whose cases have not yet gone to trial, and those who may have received an initial outcome permitting them to remain lawfully in the US, but whose case remains open because of ongoing appeals or renewal of immigration status. **To date, four of the 14 clients (29 percent) whose cases completed in immigration court have achieved an outcome that allows the client to remain in the United States.** This should not be considered representative of all SAFE Ramsey County/Saint Paul cases given the very small number of cases that have completed thus far and the fact that cases involving the pursuit of legal relief or release from custody generally require more time and labor to make the case.

I will never forget you and the help you are giving me in my case."

- Carlos*

Client of Ramsey County/Saint Paul Program

The figure below depicts Ramsey County/Saint Paul SAFE clients' current case status and outcomes.

Figure 3. Case Status and Outcomes

	Number of Clients	Percent of All Cases
Pending Cases	7	26%
Currently Detained	3	11%
Currently Non-Detained	4	15%
<i>Cases that began non-detained</i>	2	
<i>Released from detention</i>	2	
Closed Cases	20	74%
Cases Completed in Immigration Court	14	52%
<i>Relief Granted</i>	3	
<i>Termination</i>	1	
<i>Order of Removal</i>	9	
<i>Habeas Moot After Client Removed</i>	1	
Other Closed Cases (e.g., Habeas Corpus Petitions or Other Release Requests)	6	22%
Total Cases	27	100%

Zealous representation enhances due process and fairness for people facing an unbalanced and unjust system. The result of the legal case—whether the client wins or maintains the right to remain in the United States or not—is just one of many important factors in measuring the impact of programs like SAFE.

- > Obtaining legal relief is not the only goal of representation. An important goal is to level the playing field so that everyone has equal access to justice, regardless of their background.
- > Clients who receive free universal representation through SAFE and similar programs report that their attorneys treat them with respect and dignity, thereby advancing due process and fairness—while navigating an otherwise inhumane and unjust system.
- > A zealous and person-centered defense also ensures that the government cannot exercise its incredible power and authority with impunity. The Providers safeguard against the government taking away a person's freedom without meeting the burden of proof to do so.

III. Client Stories

Denpo* came to the United States as a refugee from Burma. He, his wife, and children are part of the Karen ethnic group, one of many groups that have historically faced persecution at the hands of the Burmese military. The military killed his parents and only brother, and Denpo actively opposed their violence in the 1980s and 90s. He was captured and tortured by the Burmese military and narrowly escaped. Decades later, Denpo is currently serving a sentence related to a criminal matter and was placed into deportation proceedings through the IHP. Denpo faced significant challenges finding an immigration attorney in a timely manner. Although he speaks three languages, he did not have access to resources in any of those languages that might help him navigate his immigration case without an attorney. Fortunately, Denpo was able to receive representation under this program and his legal team helped him file a claim for relief from deportation based on the threat of torture that he would face at the hands of the military dictatorship that has overthrown the civilian government in Burma. Provider secured a country conditions expert to educate the court about the political conditions in Burma and the risks Denpo would face if deported. Despite many challenging technological issues between the

detention center and the court that persist when having to defend yourself remotely, Denpo and his attorney were able to demonstrate his case and the immigration judge deferred Denpo's deportation under the United Nations Convention Against Torture (CAT), which protects people from deportation to countries where they are likely to be tortured. As result of this advocacy, Denpo will be able to remain safely in the United States with his family.

Victor* is a citizen of Mexico who came to the United States as a young child with his family. He grew up in Ramsey County and is a high school graduate. When he found out he qualified for Deferred Action for Childhood Arrivals (DACA), he hired someone to help him apply for that program. Unfortunately, that person was not an attorney and Victor later found out his DACA application was never filed and that he had lost his opportunity to apply. After a criminal conviction and several involuntary commitments due to his mental health, he was detained by ICE and placed in removal proceedings. Providers were able to convince the immigration judge to stop his deportation because of his serious mental illness, but the government appealed that decision and Victor had to remain detained while that appeal was pending. Given the risks of detention and how it was exacerbating his symptoms, the Providers, in partnership with the University of Minnesota, filed and won a petition for *habeas corpus* in federal court challenging Victor's prolonged detention. This litigation resulted in an important victory as it was the first in the district to provide important shifts to how a judge considers an immigrant's motion for bond and the burden the government must meet to deny someone's liberty. This decision will have significant impacts beyond Victor's case, benefiting many other immigrants who are challenging their detention in this district. After additional litigation around his bond proceedings, the Board of Immigration Appeals (BIA) affirmed the immigration judge's decision to grant Victor relief and he was finally released from detention – after suffering senselessly for more than a year in detention after his initial grant of relief. Now that his status is secure and he is no longer detained, Victor is making great strides at making plans for his future. He continues to receive county services to ensure he stays healthy and housed as he transitions back into the community after a year and a half in ICE custody.

Ahmed* entered the U.S. as a refugee in 1994 and then obtained lawful permanent resident status (green card holder). He is married to a U.S. citizen and ran a market in the Hmong Shopping Center since 2013. This Center was forced to close when Ahmed applied for naturalization but was detained by ICE in November 2018 based on a 15-year-old conviction. Although an immigration judge initially granted him the ability to maintain his green card through his marriage to his wife, the government appealed, and the BIA reversed the judge's decision based on a misreading of the law unique to the 8th Circuit. After the Providers identified him in detention, they worked tirelessly to correct this injustice by challenging the legality of his continued detention through a *habeas corpus* petition and filing an appeal of the BIA's decision to the U.S. Court of Appeals for the 8th Circuit. Ahmed was released on bond in February 2021, after spending more than two years in ICE custody. Providers zealously pursued his defense by leveraging support from the American Immigration Lawyers Association and University of Minnesota Law School Clinic, and pursuing opportunities presented by recent developments of law. As a result of this advocacy, the government has dismissed the deportation proceedings against him and he returns to his status as a lawful permanent resident, and can remain safely with his family in the United States.

**Names have been changed to protect client privacy.*

Endnotes

¹ For additional information, see Vera Institute of Justice, “Advancing Universal Representation Initiative,” <https://www.vera.org/ending-mass-incarceration/reducing-incarceration/detention-of-immigrants/advancing-universal-representation-initiative>.

² The Safety and Fairness for Everyone (SAFE) Network includes Alameda County, CA; Atlanta, GA; Austin, TX; Baltimore, MD; Chicago, IL; Columbus, OH; Cook County, IL; Dallas, TX; Dane County, WI; Denver, CO; Harris County, TX; Long Beach, CA; Madison, WI; New Haven, CT; Oakland, CA; Philadelphia, PA; Prince George’s County, MD; Ramsey County, MN; Sacramento, CA; San Antonio, TX; San Francisco, CA; Santa Ana, CA; and St. Paul, MN. Vera Institute of Justice, “Advancing Universal Representation Initiative,” <https://www.vera.org/ending-mass-incarceration/reducing-incarceration/detention-of-immigrants/advancing-universal-representation-initiative>.

³ On the labyrinthine nature of immigration law, see *Drax v. Reno*, 338 F.3d 98, 99 (2d Cir. 2003). See also Noel Brennan, “A View from the Immigration Bench,” *Fordham Law Review* 78, no. 2 (2009), 623-31, 624, <https://ir.lawnet.fordham.edu/cgi/viewcontent.cgi?article=4479&context=flr>. To read the remarks from Immigration Judge Dana Leigh Marks, see Dana Leigh Marks, “Immigration judge: Death penalty cases in a traffic court setting,” CNN (June 26, 2014), <https://perma.cc/SXV6-BKZN>.

⁴ Ingrid V. Eagly and Steven Shafer, “A National Study of Access to Counsel in Immigration Court,” *University of Pennsylvania Law Review*, 164, no. 1 (2015), 1-91, 22, <https://perma.cc/82F5-WE2D>.

⁵ The representation rate in immigration court fluctuates slightly over time. Historically, 81 percent of detained immigrants have lacked representation—between October 2000 and February 2022, 81 percent of all people in detention never had legal representation (1,301,883 of 1,606,068 cases). The rate has improved slightly over the past decade, with approximately 70 percent unrepresented in recent years—between October 2012 and February 2022, 71 percent of all people in detention never had legal representation (323,952 of 459,402 cases), with the exact percentage varying slightly from year to year. See Transactional Records Access Clearinghouse (TRAC), “Details on Deportation Proceedings in Immigration Court,” accessed May 16, 2022, <https://trac.syr.edu/phptools/immigration/nta/>.

⁶ In TRAC’s immigration court data, the Fort Snelling Immigration Court is listed under the Bloomington Immigration Court, and of the 20,979 cases heard before the Fort Snelling Immigration Court over the previous five full fiscal years (FY17 through FY21), 11,176 cases, or 53 percent, have/had access to legal representation. Forty-seven percent of cases (9,803 out of 20,979) lack/lacked legal representation. See Transactional Records Access Clearinghouse (TRAC), “State and County Details on Deportation Proceedings in Immigration Court,” accessed May 16, 2022, <https://trac.syr.edu/phptools/immigration/nta/>.

⁷ In TRAC’s immigration court data, the Fort Snelling Immigration Court is listed under the Bloomington Immigration Court, and of the 59,394 cases heard before the Fort Snelling Immigration Court over the previous 20 fiscal years (FY02 through FY21), 28,629 cases (48 percent) have/had access to legal representation, while 30,765 cases (52 percent) lack/lacked legal representation. See Transactional Records Access Clearinghouse (TRAC), “State and County Details on Deportation Proceedings in Immigration Court,” accessed May 16, 2022, <https://trac.syr.edu/phptools/immigration/nta/>.

⁸ In TRAC’s immigration court data, the Fort Snelling Immigration Court is listed under the Bloomington Immigration Court, and of the 20,979 cases heard before the Fort Snelling Immigration Court over the previous five full fiscal years (FY17 through FY21), 9,803 lack/lacked legal representation. See Transactional Records Access Clearinghouse (TRAC), “State and County Details on Deportation Proceedings in Immigration Court,” accessed May 16, 2022, <https://trac.syr.edu/phptools/immigration/nta/>.

⁹ The statistics in this report cover clients represented under the Ramsey County/Saint Paul SAFE program from March 1, 2020 (the beginning of data collection in Ramsey County/Saint Paul) to April 30, 2022. Providers have initiated representation for new clients since that time, which will be captured in the next reporting period.

¹⁰ See “The Institutional Hearing Program: An Overview,” (American Immigration Council, 2021), <https://www.americanimmigrationcouncil.org/research/institutional-hearing-program-overview>.

¹¹ In TRAC's immigration court data, the Fort Snelling Immigration Court is listed under the Bloomington Immigration Court. As of the end of February 2022, there were 374,430 detained cases heard at the Fort Snelling Immigration Court and 298,700 cases (79.8 percent) have gone/are unrepresented. See Transactional Records Access Clearinghouse (TRAC), "State and County Details on Deportation Proceedings in Immigration Court," accessed June 17, 2022, <https://trac.syr.edu/phptools/immigration/nta/>.

¹² In TRAC's immigration court data, the Fort Snelling Immigration Court is listed under the Bloomington Immigration Court. As of the end of February 2022, there were 4,723 cases heard at the Fort Snelling Immigration Court with Ramsey County listed as the zip code in court records. Of these cases, 1,861 cases (39.4 percent) have been/are unrepresented. See Transactional Records Access Clearinghouse (TRAC), "State and County Details on Deportation Proceedings in Immigration Court," accessed June 13, 2022, <https://trac.syr.edu/phptools/immigration/nta/>. Many people's complete addresses are not populated in immigration court records. Additionally, if the individual is detained, the zip code listed in court records may refer to where the detention facility is located. However, there are no detention centers located in Ramsey County. As such, these numbers serve as a point of reference to help gauge an approximate number of residents in immigration court on the non-detained docket.

¹³ See Transactional Records Access Clearinghouse (TRAC), "Individuals in Immigration Court by Their Address: Pending Cases With and Without Attorneys," accessed June 13, 2022, <https://trac.syr.edu/phptools/immigration/addressrep/>.

¹⁴ While Providers have initiated representation for new clients since that time, information on those clients will be captured in the next reporting period.

¹⁵ For nationwide statistics and success stories from the most recent year of the SAFE Initiative, *Rising to the Moment: Advancing the National Movement for Universal Representation* (New York: Vera Institute of Justice, 2020), <https://www.vera.org/publications/rising-to-the-moment-for-universal-representation>.

¹⁶ To be eligible for representation under SAFE, a client's household income cannot exceed 200 percent of the federal poverty level.

¹⁷ Nina Siulc and Noelle Smart, *Evidence Shows That Most Immigrants Appear for Immigration Court Hearings* (New York: Vera Institute of Justice, 2020), <https://www.vera.org/publications/immigrant-court-appearance-fact-sheet>.

¹⁸ Detained cases move quickly, as the median case completion time for non-review detained cases in FY2021 was only 43 days in US immigration courts. Non-review cases refer to removal, deportation, exclusion, asylum-only, and withholding-only cases. See United States Department of Justice, "Executive Office for Immigration Review Adjudication Statistics: Median Completion Time for Detained Cases," accessed May 26, 2022, <https://www.justice.gov/eoir/page/file/1163621/download>.