

**No. 17-35105**

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**UNITED STATES COURT OF APPEALS  
FOR THE NINTH CIRCUIT**

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STATE OF WASHINGTON, et al.,  
Plaintiffs-Appellees,

v.

DONALD TRUMP, President of the United States, et al.,  
Defendant-Appellants.

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ON APPEAL FROM THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON

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**BRIEF OF *AMICI CURIAE*  
LAW PROFESSORS AND CLINICIANS  
SUPPORTING PLAINTIFFS-APPELLEES**

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## **STATEMENT OF INTEREST**

*Amici* are law professors and clinicians at institutions of higher education. *Amici* have personal, professional, and academic connections to students, researchers, faculty, and staff from all over the world. Many *amici* teach law school clinics and have had first-hand experience with international students, faculty, and clients who have sought their direct assistance with immigration issues resulting from the President's recent Executive Order (EO). As law professors and clinicians, we have worked hard in a climate of chaos and confusion to assist international students and faculty detained at airports and stranded abroad after participating in conferences, giving talks, or engaging in research. We have also helped students and faculty navigate concerns about the impact of the revocation of their visas on their studies and employment, including the risk of being placed in removal proceedings. In addition, we have scrambled to assist numerous noncitizens not affiliated with universities who have similarly been affected by the EO. *Amici* submit this brief under Fed. R. App. P. 29, Circuit Rule 29(a)(2). All parties have consented to the submission of amici briefs in this case.

## **INTRODUCTION**

The Ninth Circuit should deny the motion for an emergency stay of the temporary restraining order (TRO) issued by the U.S. District Court for the Western District of Washington. The EO issued on January 27, 2017 creates a

serious risk of irreparable harm to our clients, students, and colleagues who have nonimmigrant (temporary) visas at United States universities. In addition, Plaintiffs-Appellees are likely to succeed on the merits of their constitutional and statutory claims.

## **ARGUMENT**

### **I. THE EO INFLECTS IRREPARABLE HARM ON INTERNATIONAL STUDENTS AND RESEARCHERS.**

On January 31, 2017, the U.S. Department of Justice released a State Department notice dated January 27, 2017, “provisionally revok[ing] *all valid nonimmigrant and immigrant visas* of nationals of Iraq, Iran, Libya, Somalia, Sudan, Syria, and Yemen,” subject to narrow exceptions for diplomatic visas and case-by-case determinations made in the national interest.<sup>1</sup> This revocation of visas made everyone with nonimmigrant visas from the seven countries, even those *within* the United States, potentially deportable under 8 U.S.C. § 1227(a)(1)(B), which provides: “Any alien who is present in the United States in violation of this Act or any other law of the United States, *or whose nonimmigrant visa (or other*

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<sup>1</sup> U.S. Department of State, letter dated Jan. 27, 2017 (released by U.S. Department of Justice on Jan. 31, 2017), <http://www.politico.com/f/?id=00000159-f6bd-d173-a959-ffff671a0001>.



*documentation authorizing admission into the United States as a nonimmigrant) has been revoked under section 221(i) is deportable.”* (Emphasis added).<sup>2</sup>

On or about February 4, 2017, the State Department issued an announcement confirming that it had, “under the Executive Order, provisionally revoked *all valid visas* of nationals of those seven countries, with limited exceptions.”<sup>3</sup> (Emphasis added). In light of the TRO issued by the U.S. District Court for the Western District of Washington, however, the State Department lifted the provisional revocation. *Id.*

The nationwide TRO currently protects thousands of international students and researchers in the United States. If the order is reversed, students and researchers will suffer irreparable harm, namely the inability to travel outside the United States and a fear that they may fall out of legal status and suffer deportation. They would be unable to leave the country to attend international symposia or conferences, engage in overseas field research, collaborate with colleagues in other countries, or visit their families without encountering impediments to their return.

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<sup>2</sup> The State Department invoked its authority under 8 U.S.C. § 1201(i), INA § 221(i), in its letter dated Jan. 27, 2017. *See supra* note 1.

<sup>3</sup> U.S. Department of State, Bureau of Consular Affairs, Important Announcement, Executive Order on Visas, <https://travel.state.gov/content/travel/en/news/important-announcement.html>.

According to data collected from the Department of Homeland Security by College Factual, a higher education data analytics and research company, there were 23,763 students with F-1 and M-1 student visas at 596 universities in the United States affected by the travel ban.<sup>4</sup> Since this number only includes students, not faculty, it actually underestimates the true number of individuals who are affected and who may be subjected to deportation if their nonimmigrant visas expired. Post-docs, medical residents, and faculty often work at United States universities with other types of nonimmigrant visas, such as J-1 visas for exchange visitors and H-1 visas for temporary workers.

Students' and researchers' concerns are consistent with those expressed by numerous American universities.<sup>5</sup> The students and researchers we work with and represent provide critical, diverse viewpoints to university life. Their experiences

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<sup>4</sup> College Factual, *How Trump's Executive Order Affects Thousands of International Students in the U.S.*, Jan. 31, 2017, <http://inside.collegefactual.com/blog/how-trumps-travel-ban-affects-thousands-of-international-students>.

<sup>5</sup> See Appendix A (list of hundreds of institutions of higher education that have expressed concerns about the EO); Association of Public Land-Grant Universities, *Public Universities Respond to New Immigration Executive Order* (including statements from 140 public universities expressing concerns about the ban), <http://www.aplu.org/members/councils/strategic-communications/immigration-actions/index.html>; International Higher Education Consulting Blog, *Running List of University/College and Higher Education Organization/Association Responses to President Trump's Executive Order Entitled "Protecting the Nation from Terrorist Entry into the United States by Foreign Nationals,"* Jan. 27, 2017, <http://ihec-djc.blogspot.com/2017/01/running-list-of-universitycollege-and.html>.

and perspectives enrich our understanding of new problems to be solved, and help identify original solutions to those problems.

Shortly after the EO was announced, over 3,000 international scholars signed a petition to “boycott international academic conferences held in the United States in solidarity with those affected by” the EO.<sup>6</sup> Not only does this suppress intellectual activity and collaboration, but it also inflicts substantial financial harm. Furthermore, if international students from the seven banned countries are no longer able to attend school in the U.S., either because they are denied entry to the country or their visas expire, our universities stand to lose hundreds of millions of dollars.<sup>7</sup> These financial losses, which would affect our programs, including our law school clinics, could be even greater if the ban also discourages students who are citizens of other Muslim-majority countries from studying in the United States.

## **II. PLAINTIFFS-APPELLEES ARE LIKELY TO SUCCEED ON THE MERITS**

Unlike the First Circuit, the Ninth Circuit has never placed special emphasis on the “likelihood of success” factor, resulting in a different legal standard here than was applied in the Massachusetts case. *See* Exh. B to Emergency Motion for Stay (*Louhghalam v. Trump*, Civ. 17-10154-NMG, Order at 20 (Feb. 3, 2017))

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<sup>6</sup> Elizabeth Redden, *Boycotting the U.S.*, Inside Higher Ed (Jan. 31, 2017), <https://www.insidehighered.com/news/2017/01/31/protest-trump-entry-ban-some-scholars-are-boycotting-us-based-conferences>.

<sup>7</sup> *See* College Factual, *supra* note 4 (estimating that revocation of student visas at 596 schools would result in losses of \$700 million).

(citing *Coquico, Inc. v. Rodriguez-Miranda*, 562 F.3d 62, 66 (1st Cir. 2009) (holding that the likelihood of success factor weighs most heavily in the decision). Here, the District Court judge correctly relied on Ninth Circuit precedents that consider all four factors using a sliding scale. *See All. for the Wild Rockies v. Cottrell*, 632 F.3d 1127, 1134-35 (9th Cir. 2011); *Stormans, Inc. v. Selecky*, 586 F.3d 1109, 1127 (9th Cir. 2009) (citing *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 24 (2008)).

#### **A. The EO Violates Due Process Rights of Nonimmigrants**

Nonimmigrants who have been *granted visas* and are *already living* in the United States have due process rights to stay here; those who are abroad have a due process interest in proper adjudication of their rights to be in the United States. U.S. Const. amend. V. The EO affects not only nonimmigrants who are seeking entry for the first time, but also those who have established ties to the United States, including students and faculty who we have assisted in the past weeks as they grapple with the EO's impact. The EO inflicted irreparable harm on nonimmigrants within the United States who suddenly lost their ability to travel, had their visas revoked, and thereby feared deportation. Many of these students and faculty members have already been in the United States for years, are in the middle of degree programs, and have made significant intellectual contributions to the United States. They should receive due process protections commensurate with

their substantial ties to the United States. This Court need not determine the precise contours of the process due to nonimmigrants living in the United States (or those abroad) in deciding this appeal. It need only find a likelihood of success in showing that the process received by these nonimmigrants – which involved no notice, no opportunity to respond, and no individualized analysis of risk to national security – was insufficient.

Even if the Court applies the “facially legitimate and bona fide” standard that has been applied to individuals seeking admission, the EO fails to satisfy that test. While national security may, in some cases, be a facially legitimate reason, it is not legitimate when applied without any individualized analysis to entire nations. *Cf. Kleindienst v. Mandel*, 408 U.S. 753, 769 (1982) (finding a “facially legitimate and bona fide” reason for the denial of visa to an individual who had violated the conditions of his visa on two prior trips); *Kerry v. Din*, 135 S.Ct. 2128, 2140 (2015) (finding a “facially legitimate and bone fide” reason for the denial of a visa to an Afghan national who had previously been employed by the Taliban). Neither the Supreme Court nor the Ninth Circuit has ever held that national origin, religion, or race alone constitutes a “facially legitimate and bona fide reason.” The overbreadth of the EO reflects the type of “unfettered discretion” that the Supreme Court has explicitly rejected. *See Kleindienst*, 408 U.S. at 762; *Fiallo v. Bell*, 430 U.S. 787, 807 (1977).

Furthermore, even if national security provides a facially legitimate reason for the EO, it is not a bona fide reason for the ban on all individuals from seven Muslim-majority countries. As previously recognized by this Court, the “facially legitimate” and “bona fide” prongs of the test are distinct. *See Bustamante v. Mukasey*, 531 F.3d 1059, 1062-1063 (9th Cir. 2012) (examining the “bona fide” prong separately). The “bona fide” part of the test requires a court to distinguish between good faith reasons and pretextual excuses. In other contexts, appellate courts have given great deference to trial courts’ determinations of whether the government’s explanation is bona fide. *See Kesser v. Cambra*, 465 F.3d 351, 356 (9th Cir. 2006) (noting that the court of appeal gave “great deference to the trial court in distinguishing bona fide reasons from sham excuses”); *Felkner v. Jackson*, 562 U.S. 594, 596 (2011) (same).

Here, there is substantial evidence that the ban was motivated by animus against Muslims. For example, on January 28, 2017, a week after the inauguration, Former New York City Mayor Rudy Giuliani stated in an interview that President Trump had previously asked him about legally implementing a “Muslim ban.”<sup>8</sup> Indeed, for nearly a year preceding the election, President Trump’s campaign

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<sup>8</sup>Rebecca Savransky, Giuliani: Trump asked me how to do a Muslim ban ‘legally’, THE HILL, Jan. 28, 2017, <http://thehill.com/homenews/administration/316726-giuliani-trump-asked-me-how-to-do-a-muslim-ban-legally>.

website referred to a “Muslim ban,” indicating discriminatory intent.<sup>9</sup> The evidence that there was no bona fide reason for the ban will be developed further through discovery. In the interim, however, the TRO should remain in place to prevent irreparable harm to nonimmigrants.

### **B. The EO Violates the Immigration and Nationality Act and the Administrative Procedure Act**

The INA provides the procedure due to arriving nonimmigrants with valid nonimmigrant visas. The EO violates those procedures in three ways. First, the statute requires that the procedure for admission be set through regulation. 8 U.S.C. § 1184(a) (“The admission to the United States of any alien as a nonimmigrant shall be for such time and under such conditions as the Attorney General may by regulations prescribe[.]”). The EO was not promulgated as a regulation. It never went through the public notice and comment procedures that help ensure transparent, deliberate, well-reasoned policies under § 553 of the Administrative Procedure Act (APA). In fact, the EO was never even vetted by key agency officials or career diplomats with relevant expertise, hundreds of whom

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<sup>9</sup>Noah Bierman, Donald Trump’s Muslim ban was removed from the Website, but it’s back,” LOS ANGELES TIMES, Nov. 10, 2016, <http://www.latimes.com/nation/politics/trailguide/la-na-updates-trail-guide-so-what-s-the-deal-with-donald-trump-s-1478812963-htmlstory.html>; *see also* Press Release, Trump-Pence Campaign, Donald J. Trump Statement on Preventing Muslim Immigration, Dec. 7, 2015, <https://www.donaldjtrump.com/press-releases/donald-j.-trump-statement-on-preventing-muslim-immigration>.

have since explicitly voiced their opposition to the EO, including the former Acting Attorney General, Sally Yates, who refused to defend the ban.<sup>10</sup> The failure to use a transparent process also contributed to the chaos and confusion that ensued after the EO was suddenly issued.

Second, the statute requires that a nonimmigrant visa “shall be valid for the period the regulations proscribe.” *Id.* § 1201(c)(2). However, the EO effectively invalidated the visas for travel purposes. Third, the INA denies admission to nonimmigrants only when they are inadmissible under the INA or “any other provision of law.” 8 U.S.C. § 1201(h). The EO denies admission to all visa holders from the seven countries regardless of admissibility.

In addition, with respect to immigrant visas, the INA prohibits discrimination in admissions based on nationality. 8 U.S.C. § 1152(a)(1)(A). Congress enacted the nondiscriminatory provision *after* 8 U.S.C. § 1182(f), which authorizes the President to “suspend the entry of all aliens or any class of aliens as immigrants or nonimmigrants, or impose on the entry of aliens any restrictions he may deem to be appropriate.” The provision allowing suspension of entry of

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<sup>10</sup> See Elisa Labott, *Over 900 US Career diplomats protest Trump Order*, CNN, Jan. 31, 2017, <http://www.cnn.com/2017/01/30/politics/career-diplomats-dissent-memo/>; Michael D. Shear, Mark Landler, Matt Apuzzo, and Eric Lichtblau, *Trump Fires Acting Attorney General Who Defies Him*, NEW YORK TIMES, Jan. 30, 2017, <https://www.nytimes.com/2017/01/30/us/politics/trump-immigration-ban-memo.html>.



classes of aliens is therefore subject to the nondiscrimination requirement in 8 U.S.C. § 1152(a)(1)(A). Furthermore, the President's authority under 8 U.S.C. § 1182(f) should not be interpreted to undermine the requirement that the procedures for nonimmigrant admission be set through regulation. 8 U.S.C. § 1184(a).

By violating the plain language of the INA, the EO is also arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law, in violation of APA § 706(2)(A); in excess of statutory jurisdiction, authority, or limitations, or short of statutory right, in violation of APA § 706(2)(C); and without observance of procedure required by law, in violation of § 706(2)(D).

Although the President is not an “agency” under the APA, *Franklin v. MA*, 505 U.S. 788, 797 (1992), an agency's implementation of presidential directives must still conform to the APA. *See, e.g., Chamber of Commerce v. Reich*, 74 F.3d 1322, 1327 (D.C. Cir. 1996) (“that the Secretary's regulations are based on the President's Executive Order hardly seems to insulate them from judicial review under the APA, even if the validity of the Order were thereby drawn into question.”); *Public Citizen v. United States Trade Representative*, 5 F.3d 549, 552 (D.C. Cir. 1993) (noting that the denial of judicial review over presidential actions “is limited to those cases in which the President has constitutional or statutory responsibility for the *final step* necessary for the agency action directly to affect the parties). Where, as here, immigration decisions require action by administrative

officials, courts routinely apply the APA and administrative law doctrines.

### **CONCLUSION**

In order to protect the constitutional and statutory rights of nonimmigrants and prevent irreparable harm to our colleagues and clients -- students and faculty with nonimmigrant visas -- the Court should deny the motion to stay or vacate the TRO issued by the U.S. District Court for the Western District of Washington. The TRO should remain in place as parties conduct discovery and the trial court holds an evidentiary hearing.

DATED: February 5, 2017

Respectfully submitted,

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Jamila Jefferson-Jones, University of Missouri - Kansas City

Dalie Jimenez, University of Connecticut School of Law

Paula Johnson, Syracuse University College of Law

José (Beto) Juárez, University of Denver Sturm College of Law

Doron Kalir, Civil Litigation Clinic, Cleveland Marshall College of Law

Mary Kate Kearney, Widener Commonwealth Law School

Christine Kellett, Dickinson Law/Penn State

Kathryn Kelly, The Catholic University of America

Laura Kessler, University of Utah, S.J. Quinney College of Law

Elizabeth Keyes, University of Baltimore School of Law

Kathleen Kim, Loyola Law School

Catherine Kim, University of North Carolina School of Law

Andrew Kim, Syracuse University College of Law

Diane Klein, University of La Verne College of Law

Eunice Lee, UC Hastings Center for Gender & Refugee Studies

Jennifer Lee Koh, Western State College of Law

Daniel M. Kowalski, Bender's Immigration Bulletin (LexisNexis)

Annie Lai, UC Irvine School of Law

Prerna Lal, East Bay Community Law Center, Berkeley Law

Laurie Leader Chicago-Kent College of Law, IIT

Terri LeClercq, School of Law, Univeristy of Texas

Evelyn Lewis, UCD Law

Joellen Lind, Valparaiso University Law School

Jeffrey Lubbers, American University, Washington College of Law

Beth Lyon, Cornell Law School

Elizabeth MacDowell, William S.Boyd School of Law, UNLV

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N. Cardozo School of Law

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Fiona McKenna, Golden Gate University School of Law

Michelle McKinley, University of Oregon School of Law

Mary Brigid McManamon, Delaware Law School

Judith McMorrow, Boston College Law School

Stephen Meili, University of Minnesota Law School

Chi Mgbako, Fordham University School of Law

Binny Miller, American University, Washington College of Law

Elliott Milstein, American University Washington College of Law

Sherizaan Minwalla, American University, Washington College of Law

Behzad Mirhashem, UNH School of Law

Jennifer Moore, University of New Mexico School of Law

Nancy Morawetz, NYU School of Law

Kathleen Morris, Golden Gate Law School

Mary-Beth Moylan, University of the Pacific, McGeorge School of Law

Professor Ann Murphy, Gonzaga University School of Law

Yxta Maya, Murray Loyola Law School

Karen Musalo, UC Hastings Center for Gender & Refugee Studies

Natalie Nanasi, SMU Dedman School of Law

Jason Neidleman, University of La Verne

Nise Nekheba, Florida A&M University College Of Law

Lori Nessel, Seton Hall University School of Law

Xuan-Thao Nguyen, Indiana University McKinney School of Law

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Sunita Patel, American University Washington College of Law

Carole Petersen, William S. Richardson School of Law

Huyen Pham, Texas A&M University School of Law

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Michael Rooke-Ley, Nova Southeastern University College of Law

Leslie Rose, Golden Gate University School of Law

Rand Rosenblatt, Rutgers University Law School

Florence Rousman, Indiana U. Robert H. McKinney School of Law

Judith Royster, University of Tulsa College of Law

Rubén G. Rumbaut, University of California, Irvine

Kevin Ruser, University of Nebraska College of Law

Margaret Russell, Santa Clara University

C. Mario Russell, Catholic Charities NY, St. John's Law School

Emily Ryo, USC Gould School of Law

Jendayi Saada, University of La Verne College of Law

Laura Sager, New York University School of Law

Richard Sander, UCLA School of Law

Margaret Satterthwaite, NYU School of Law

Irene Scharf, Univ of Massachusetts School of Law

Erica Schommer, St. Mary's University School of Law

Sean Scott, Loyola Law School

Kim Thuy Seelinger, Human Rights Center, University of California, Berkeley

Rachel Settlage, Wayne State Law School

Sudha Setty, Western New England University School of Law

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S.I., Strong University of Missouri

Ellen Suni, UMKC School of Law

Maureen Sweeney, University of Maryland Carey School of Law

Chantal Thomas, Cornell University Law School

Claire Thomas, Safe Passage Project Immigration Clinic at New York Law School

Michael Tigar, Washington College of Law

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Jonathan Weinberg, Wayne State University

Marley Weiss, University of Maryland Carey School of Law

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Deborah Weissman, University of North Carolina

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Barbara Woodhouse, Emory Law School

Karen Woody, Indiana University, Kelley School of Business

Marcia Zug, University of South Carolina

## CERTIFICATION OF COMPLIANCE

This brief complies with the typeface and type style requirements of Fed. R. App. P. 32(a)(5)(a) and (a)(6) because it has been prepared in a proportionally spaced typeface, using Microsoft Word in Times New Roman 14-point font.

This brief complies with the type-volume limitations of Fed. R. App. P. 29(d) because it contains 2,577 words excluding the parts exempted by Fed. R. App. P. 32(a)(7)(B)(iii). (The maximum number of words is 2,600 for an *amicus* brief in connection with a motion, which has a word limit of 5,200 words under Fed. R. App. P. 27(d)(2)(A)).

Dated: February 5, 2017

/s/ Fatma E. Marouf

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 5, 2017, I electronically filed the foregoing with the Clerk of the court for the United States Court of Appeals for the Ninth Circuit using the appellate CM/ECF system.

I certify that all participants in this case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

DATED: February 5, 2017

Respectfully submitted,

/s/ Fatma E. Marouf

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**APPENDIX A TO AMICI BRIEF****LIST OF U.S. INSTITUTIONS OF HIGHER EDUCATION THAT HAVE  
ISSUED STATEMENTS EXPRESSING CONCERNS ABOUT THE  
EXECUTIVE ORDER 13769**

1. Adelphi University
2. Amherst College
3. Appalachian State University
4. Auburn University
5. Babson College
6. Ball State University
7. Bard College
8. Barnard College
9. Bates College
10. Beloit College
11. Bentley University
12. Binghamton University
13. Boston College
14. Boston University
15. Bowling Green State University
16. Brandeis University
17. Brown University
18. Bryn Mawr College
19. Bucknell University
20. Butler University
21. California Institute of Technology
22. Carleton College
23. Carlow University
24. California State University, Dominguez Hills
25. California State University, Fresno
26. California State University, Fullerton
27. California State University, Northridge
28. California State University System
29. Carnegie Mellon University
30. Central Michigan University
31. Chatham University
32. Chestnut Hill College
33. City University of New York
34. Clemson University

35. Cleveland State University
36. Cleveland State University Faculty Senate
37. Colgate University
38. College of Charleston
39. College of William & Mary
40. Colorado State University
41. Columbia College Chicago
42. Cornell University
43. Creighton University
44. Dakota State University
45. Dartmouth College
46. DePauw University
47. DePaul University
48. Drexel University
49. Faculty of the Drexel University Thomas R. Kline School of Law
50. Duke University
51. Duquesne University
52. Earlham College
53. East Carolina University
54. Eastern Michigan University
55. Edmonds Community College
56. Elizabethtown College
57. Elon University
58. Emerson College
59. Fairleigh Dickinson University
60. Florida International University
61. Florida State University
62. Foothill College
63. Fordham University
64. Georgia Institute of Technology
65. Georgetown University
66. George Mason University
67. George Washington University
68. Georgia Institute of Technology
69. Georgia State University
70. Grand Valley State University
71. Grinnell College
72. Hampshire College
73. Harrisburg Area Community College
74. Harvard University

75. Hiram College
76. Humboldt State University
77. Illinois Institute of Technology
78. Illinois State University
79. Indiana University
80. Iowa State University
81. Ithaca College
82. James Madison University
83. John Carroll University
84. Johns Hopkins University
85. Kalamazoo College
86. Kansas State University
87. Kent State University
88. Kenyon College
89. Lafayette College
90. Lehigh University
91. Lewis University
92. Louisiana State University of Alexandria
93. Loyola University Chicago
94. Loyola University Maryland
95. Loyola University New Orleans
96. Macalester College
97. Madison College
98. Marquette University
99. Marshall University
100. Massachusetts Institute of Technology
101. Marywood University
102. Miami University
103. Michigan State University
104. Michigan Technological University
105. Middlebury Institute of International Studies at Monterey
106. Minerva
107. Minnesota State University Mankato
108. Mississippi State University
109. Missouri University of Science and Technology
110. Missouri State University
111. Montana State University
112. Montclair State University
113. Mount Holyoke College
114. New Mexico State University

115. New York University
116. North Carolina State University
117. Northern Illinois University
118. Northwest Missouri State University
119. Northwestern University
120. Northwestern State University
121. Oberlin College
122. Ohio State University
123. Ohio University
124. Ohio Wesleyan University
125. Oklahoma State University
126. Old Dominion University
127. Oregon State University
128. Pacific Lutheran University
129. Pacific Oaks College
130. Pacific University
131. Park University
132. Pennsylvania State University
133. Pomona College
134. Portland State University
135. Princeton University
136. Purdue University
137. Ramapo College
138. Rice University
139. Rochester Institute of Technology
140. Rockefeller University
141. Roosevelt University
142. Rutgers, The State University of New Jersey
143. Rutgers University – Newark
144. Saint Xavier University
145. San Diego State University
146. San Francisco State University
147. Saybrook University
148. School for International Training (SIT) and SIT Graduate Institute
149. Seattle University
150. Seattle Pacific University
151. Smith College
152. Sonoma State University
153. South Dakota State University
154. Southern New Hampshire University

155. St. Louis University
156. St. Olaf College
157. Stanford University
158. State University of New York (SUNY) System
159. Stony Brook University
160. Suffolk University
161. Swarthmore College
162. Syracuse University
163. TCS Education System
164. Temple University
165. Texas A&M University
166. Texas Tech University
167. The Chicago School of Professional Psychology
168. The College of New Jersey
169. The College of Saint Rose
170. The Colleges of Law
171. Towson University
172. Trinity College
173. Troy University
174. Truman State University
175. Tufts University
176. University of Akron
177. University of Alabama
178. University of Alabama at Birmingham
179. University of Arizona
180. University of Arkansas Fayetteville
181. University of Buffalo
182. University of California, Berkeley
183. University of California, Davis
184. University of California, Irvine
185. University of California, Los Angeles
186. University of California, San Diego
187. University of California System
188. University of California Hastings College of the Law
189. University of Central Florida
190. University of Chicago and Letter to President Trump
191. University of Cincinnati
192. University of Colorado Boulder
193. University of Colorado Colorado Springs
194. University of Colorado Denver - Anschutz Medical Campus



195. University of Connecticut
196. University of Dayton
197. University of Delaware
198. University of Denver
199. University of Detroit Mercy
200. University of Evansville
201. University of Florida
202. University of Georgia
203. University of Hawai'i
204. University of Idaho
205. University of Illinois System
206. University of Illinois at Urbana-Champaign
207. University of Iowa
208. University of Kansas
209. University of Kentucky
210. University of Maryland
211. University of Maryland Baltimore County
212. University of Massachusetts Amherst
213. University of Massachusetts Boston
214. University of Massachusetts Dartmouth
215. University of Massachusetts Lowell
216. University of Massachusetts System
217. University of Memphis
218. University of Michigan
219. University of Minnesota
220. University of Mississippi
221. University of Missouri
222. University of Missouri-Kansas City
223. University of Missouri-St. Louis
224. University of Missouri System
225. University of Montana
226. University of Nebraska System
227. University of Nebraska-Lincoln
228. University of New Hampshire
229. University of New Mexico
230. University of Notre Dame
231. University of North Carolina at Chapel Hill
232. University of North Carolina at Charlotte
233. University of North Carolina at Greensboro
234. University of North Carolina at Wilmington

235. University of North Carolina System
236. University of North Texas
237. University of Oklahoma
238. University of Oregon
239. University of Pennsylvania
240. University of Pittsburgh
241. University of Portland
242. University of Rhode Island
243. University of Richmond
244. University of Rochester
245. University of San Diego
246. University of South Alabama
247. University of South Carolina
248. University of South Dakota
249. University of South Florida System
250. University of Southern California
251. University of Southern Indiana
252. University of Tennessee
253. University of Texas Arlington
254. University of Texas at Austin
255. University of Texas at Dallas
256. University of Texas System
257. University of Toledo
258. University of Tulsa
259. University of Vermont
260. University of Virginia
261. University of Washington
262. University of Washington International Student Services
263. University of Washington, Bothell
264. University of Wisconsin-Madison
265. University of Wisconsin-Eau Claire
266. University of Wisconsin-La Crosse
267. University of Wisconsin-Milwaukee
268. University of Wisconsin-Platteville
269. University of Wyoming
270. University System of Georgia
271. University System of Maryland
272. Utah State University
273. Valparaiso University
274. Vanderbilt University

275. Virginia Commonwealth University
276. Virginia Polytechnic Institute and State University
277. Xavier University
278. Washington University
279. Washington State University
280. Wayne State University
281. Wellesley College
282. Wesleyan University
283. West Virginia University
284. Western Kentucky University
285. Western Michigan University
286. Western Washington University
287. Wichita State University
288. Williams College
289. Wilson College
290. Wofford College
291. Wright State University
292. Yale University