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#### San Francisco

1458 Howard Street  
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#### Washington, D.C.

600 14th Street, NW  
Suite 502  
Washington, D.C. 20005

#### San Antonio

10127 Morocco Street  
Suite 149  
San Antonio, TX 78216

#### Houston

540 Heights Blvd  
Suite 205  
Houston, TX 77007

ilrc@ilrc.org  
www.ilrc.org



April 9, 2025

Mark Phillips, Chief

Residence and Naturalization Division, Office of Policy and Strategy  
U.S. Citizenship and Immigration Services  
Department of Homeland Security  
5900 Capital Gateway Drive  
Camp Springs, MD 20746

*[Submitted via Regulations.gov]*

Re: Immigrant Legal Resource Center Comment on the Interim Final Rule "Alien Registration Form and Evidence of Registration," DHS Docket No. USCIS-2025-0004, RIN 1615-AC96.

Dear Chief Phillips

The Immigrant Legal Resource Center (ILRC) submits the following comment in response to the Interim Final Rule (IFR) "Alien Registration Form and Evidence of Registration" published on March 12, 2025.

The ILRC is a national non-profit organization that provides legal trainings, educational materials, and advocacy to advance immigrant rights. The ILRC's mission is to work with and educate immigrants, community organizations, and the legal sector to continue to build a democratic society that values diversity and the rights of all people. Since its inception in 1979, the ILRC has provided technical assistance on hundreds of thousands of immigration law issues, trained thousands of advocates and pro bono attorneys annually on immigration law, distributed thousands of practitioner guides, provided expertise to immigrant-led advocacy efforts across the country, and supported hundreds of immigration legal non-profit organizations in building their capacity.

We stand in staunch opposition to the IFR and the process of registration as a whole. Registration campaigns like this one are authoritarian tools to sow fear, chaos and instability in communities and do not correlate at all to national security or public safety. In the past, these types of registration processes have resulted in egregious deprivations of constitutional rights and abuses against populations who have been demonized for political gain yet have not yielded any demonstrable benefit for the country. The current process contemplated by the IFR will be no different. Further, the promulgation of this IFR flies in the face of established regulatory practice, denying the public a meaningful chance to provide comment on a major shift in the enforcement of the law. The Department of Homeland Security (DHS) inexplicably and improperly denotes this as a "procedural" rule, ignoring the grave impact the IFR will have on communities throughout the country. Simply mischaracterizing the scope of this rule does not negate the catastrophic results that will ensue.

We urge the Department of Homeland Security (DHS) to rescind this rule in full and to rescind the registration requirement found at 8 C.F.R. Part 264.

**I. The rule is not a procedural rule and the promulgation of the rule and premature publication and use of Form G-325R violates the law.**

The convoluted path to this new rule unfolded in several uncoordinated stages that violate the law and are arbitrary and capricious. The Executive Order 14159 on January 20, 2025 announced the President’s plan to direct DHS to immediately publicize information about the legal obligation of all unregistered “aliens”<sup>1</sup> to register or face civil and criminal enforcement penalties. On March 12, 2025, DHS published this Interim Final Rule (IFR), *Alien Registration Form and Evidence of Registration*. The purpose of the rule is to “designate a new registration form for aliens to comply with statutory alien registration and fingerprinting provisions.” DHS asserts that it published the rule as an interim final rule effective on April 11, 2025 because it is “procedural” and does not impact substantive rights of the public affected. Along with the March 12, 2025 IFR notice, DHS published notice for the new Form G-325R denoting a 60-day comment period (comments due on May 12, 2025) separate and distinct from the comment period of the IFR (comments due April 11, 2025). DHS claims that an emergency authorization under the Paperwork Reduction Act (PRA)<sup>2</sup> was sought and approved for the release of the form. However, Form G-325R was operational and available for online filing as of at least February 25, 2025, prior to any notice in the Federal Register for the registration process or form.

This rule has been purposefully mischaracterized by DHS as “procedural.” In doing so, DHS is deliberately trying to evade the correct notice and comment procedure required by the Administrative Procedures Act (APA)<sup>3</sup> in publishing a rule that will have a profound effect on millions of individuals impacted by the rule’s requirements, while offering no opportunity to participate in the development of the rule. In addition, multiple aspects of this rulemaking are in violation of the APA and the PRA for reasons detailed below and the rule is so vague, contradictory, inconsistent, irrational, and poorly drafted that it is arbitrary and capricious. Likewise, the publication of Form G-325R in the same notice as the IFR is an attempt to evade scrutiny on an information collection that is impermissibly overbroad and vague.

Although the notice states that comments will be accepted and considered on the IFR and form, given the government’s actions to this point, there is no assurance that such comments will have any impact in this process. The government’s development of the rule and accompanying form demonstrates an egregious intent to bypass any meaningful public notice and comment, flouting well-established law and precedent in an attempt to ram through a major policy change that will decimate due process for millions of people.

Our comment will address both the IFR and the form the G-325R.

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<sup>1</sup> The ILRC strongly condemns the derogatory and xenophobic connotations of the word “alien” and only uses the term to be explicit about the government’s statements and actions and to reference specific sections of the law..

<sup>2</sup> 44 U.S.C. § 3501 et seq.

<sup>3</sup> 5 U.S.C. § 551 et seq.

**A. The rule was improperly published as an Interim Final Rule in violation of the Administrative Procedures Act.**

DHS claims the ability to publish this rule as an IFR without prior opportunity for comment because it is a rule of an agency organization that does not alter the rights or interests of the public affected. The government claims that they “merely add another method (the myUSCIS registration process) for compliance with registration and does not alter the rights or interests of any party.”<sup>4</sup>

This disingenuous characterization of a rule that utilizes a new form that has never been commented on or used before it was made available to the public is patently absurd. The affected public is facing civil and criminal enforcement penalties for failure to comply, and the content of the rule is so conflicting and unclear that it is virtually impossible to know whether one has complied.

The APA favors public notice and comment except in very particular circumstances. Under 8 U.S.C. § 553(b)(A), normal public participation and comment does not apply to interpretative rules, general statements of policy, or rules of agency organization, procedure, or practice. The current rule creates a requirement that individuals provide new proof of registration to any enforcement person who requests it, or face criminal or civil penalties. This is not a rule about internal agency procedures or organization. It is a rule directly impacting the rights of millions of people - immigrants and U.S. citizens alike - who will undoubtedly be swept up in racially motivated stops and directed to “show papers” to immigration officials.

**B. The publication of Form G-325R violates the Paperwork Reduction Act.**

The PRA also requires that information collections, that is, forms such as the G-325R, must be subject to analysis, notice and comment on forms that impact public eligibility. Specifically, the PRA requires a 60-day comment period followed by a second 30-day comment period.<sup>5</sup> Here, the form was made available to the public on February 25, 2025, with no opportunity for public comment. After the fact, on March 12, 2025, DHS published the current IFR and is claiming that it is collecting comments on a form that is already being used by the affected public.

This is an impermissible violation of the PRA. The information collected on the G-325R will be used for enforcement purposes to compel “self-deportation” for undocumented individuals, denying benefits to eligible applicants and feeding more people into the deportation pipeline. As stated above, the “show your papers” effect of the IFR will create fear, confusion and barriers for people living in the United States regardless of immigration status. The IFR and accompanying form represent an immense change in immigration law. The overall effect of the IFR will be to deprive the affected public - which is a broad swath of citizens and noncitizens alike - the lack of opportunity to comment on the form is indefensible.

**C. The content of the rule and the form is arbitrary and capricious because it is confusing, contradictory, vague, and unsupported by rational analysis or instructions.**

The rule presents the affected public with an obligation that can result in criminal penalties, yet it is so unclear and poorly written that the affected public have not been given proper explanation of the requirements.

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<sup>4</sup> *Alien Registration Form and Evidence of Registration*, 90 Fed. Reg. 11,797 (Mar. 12, 2025) (to be codified at 8 C.F.R. pt. 264).

<sup>5</sup> 5 U.S.C. § 551 et seq.

- The IFR lists some 22 groups of persons who are already considered “registered” because they have filed for a benefit and been fingerprinted by DHS, yet many additional groups of persons who have also filed for a benefit and have been fingerprinted are excluded from this list: persons who have filed for U, T, or VAWA benefits in addition to persons who filed for asylum or temporary protected status are not included, for example. No rationale is provided for the exclusions from this list.
- Elsewhere the rule is contradictory: children who turn 14 must register, but the rule states in one section that if they have one of the forms listed, they “need not register again” while in another section the rule states that all noncitizen children must register when they turn 14, whether previously registered or not.<sup>6</sup>
- The rule does not provide a time period for compliance. In fact, the form first appeared on the U.S. Citizenship and Immigration Services (USCIS) website on February 25, 2025, and encouraged the public to apply weeks before the IFR even existed. It is unclear to the public what the compliance period is under the IFR.

The G-325R furthers the confusion of this registration requirement. There are no instructions nor definitions in the form, which asks detailed biographic information including name, address, date of birth, place of birth, citizenship, email address, mobile phone number, address history for 5 years, I-94 number, and similar information about the individual’s spouse, mother, and father. Inexplicably, the form also asks, “Since entry in what activities have you been engaged?” and “In what activities do you intend to engage between now and your expected date of departure?”

Again, there are no instructions or definitions for this form, which appeared on the USCIS for use before the IFR and has been through no notice and comment before it was published. This is highly unusual, if not unprecedented for USCIS forms. Even the most routine forms have instructions on how to complete the form and there is nothing “routine” about the G-325R as it requests personal, in-depth information about the applicant, family members, and allows for the submission of additional evidence. It is entirely unclear what the affected public is supposed to include when listing “activities” in this section of the form. This question in particular is vague, arbitrary, and capricious. The form also solicits information about any criminal charges or citations. At the end, the form asks the individual to provide “additional evidence” by uploading documents to their online form, without describing what that additional evidence is supposed to prove or what the benefit of providing such evidence will be.

Compliance with the online registration and fingerprinting is supposed to result in a document called a “Proof of Alien Registration” with a unique identifier which individuals are supposed to download from a PDF and carry as proof of registration. Unlike all other forms created by USCIS, this mystery form has no identifying number in its title. Such a document has not been submitted to OIRA through the PRA and does not exist at present.<sup>7</sup> There is no guidance on how such a form will be recognized as compliant or whether the “unique identifier” number will be an

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<sup>6</sup> 90 Fed. Reg. at 11797.

<sup>7</sup> All of this presupposes that the government intends on issuing such a document to those who complete the registration process. Given the lack of clarity around the form and process and the statements from government officials touting the benefits of “self-deportation” (see “DHS Launches CBP Home App with Self-Deport Reporting Feature” (March 10, 2025), available at <https://www.dhs.gov/news/2025/03/10/dhs-launches-cbp-home-app-self-deport-reporting-feature>), it might appear that there is no plan to offer any real proof of registration, but rather to collect information from undocumented noncitizens simply to arrest, detain and deport them as expeditiously as possible.

A number or a different number categorization. All these uncertainties add to the conclusion that this IFR is arbitrary and capricious in violation of the APA and must be rescinded immediately.

#### **D. Form G-325R does not fall within the limited exceptions to notice and comment procedures**

Under the PRA, “emergency processing” without normal notice and comment periods is permitted only in limited circumstances.<sup>8</sup> DHS claims in this IFR that the agency sought an emergency exception to the PRA’s notice and comment requirement for the G-325R.<sup>9</sup> However, there is no explanation or justification given to bolster the claim that the requirements for emergency publication set forth in 5 CFR § 1320.13 were met. Additionally, the form was made operational on the USCIS website on February 25, 2025, before there was a Federal Register notice of a form or a rule.

The PRA favors notice and comment in the development of information collections. The specific requirements of that emergency processing were not met here. The regulations require a rationale such as public harm, an unanticipated event or a statutory deadline that will be missed. No such rationale was provided here, and the public was not provided with a Federal Register notice which emergency processing is required to provide.<sup>10</sup> A form approved under this “emergency” is only supposed to be valid for 90 days according to the regulation, adding another layer of confusion to this already irrational process. Further, it is not clear at which point the emergency approval period that DHS secured from OMB started as the form has been operational on the USCIS website since at least February 25, 2025 but the IFR was not published until March.

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<sup>8</sup> 6 CFR § 1320.13

<sup>9</sup> 90 Fed. Reg. 11799, citing 5 CFR § 1320.13.

<sup>10</sup> 6 CFR §1320.13 Emergency processing.

An agency head or the Senior Official, or their designee, may request OMB to authorize emergency processing of submissions of collections of information.

(a) Any such request shall be accompanied by a written determination that:

(1) The collection of information:

(i) Is needed prior to the expiration of time periods established under this Part; and

(ii) Is essential to the mission of the agency; and

(b) The agency shall state the time period within which OMB should approve or disapprove the collection of information.

(c) The agency shall submit information indicating that it has taken all practicable steps to consult with interested agencies and members of the public in order to minimize the burden of the collection of information.

(d) The agency shall set forth in the Federal Register notice prescribed by [§ 1320.5\(a\)\(1\)\(iv\)](#), unless waived or modified under this section, a statement that it is requesting emergency processing, and the time period stated under [paragraph \(b\)](#) of this section.

(e) OMB shall approve or disapprove each such submission within the time period stated under [paragraph \(b\)](#) of this section, provided that such time period is consistent with the purposes of this Act.

(f) If OMB approves the collection of information, it shall assign a control number valid for a maximum of 90 days after receipt of the agency submission.

(2) The agency cannot reasonably comply with the normal clearance procedures under this part because:

(i) Public harm is reasonably likely to result if normal clearance procedures are followed;

(ii) An unanticipated event has occurred; or

(iii) The use of normal clearance procedures is reasonably likely to prevent or disrupt the collection of information or is reasonably likely to cause a statutory or court ordered deadline to be missed.

## **II. Registration will result in egregious violations and harm to U.S communities and the federal government.**

The use of registration systems like the one contemplated by the IFR, have historically been used to discriminate on the basis of nationality and religion. Registration systems in the United States have resulted in the deprivation of liberty and property against those that the government seeks to label “enemy” for political purposes. The IFR’s contemplated registration scheme will be no different.

During World War II, the federal government, pursuant to The Alien Registration Act of 1940 required noncitizens to register with the federal government or face imprisonment or fine. The purpose of the Act was to “prohibit certain subversive activities.”<sup>11</sup> This law is the basis for the IFR at issue in this comment. By early 1942, the Department of Justice had arrested 2,192 Japanese, 1,393 German, and 264 Italian nationals.<sup>12</sup> This law also led to the internment of over 120,000 individuals of Japanese descent including U.S citizens, and who, as a result, lost their homes, businesses, jobs, and communities. A 1980 government review found that there was no evidence of military necessity of removal and incarceration, concluding that racism, war hysteria, and failure of political leadership led to grave injustice to communities impacted.<sup>13</sup>

More recently, in the wake of 9/11, the Bush administration created a registration system for Muslim and Arab men called the National Security Entry-Exit Registration System (NSEERS), which led to prolific racial, ethnic, and religious discrimination. Over the course of a decade, thousands of Muslim and Arab men registered through the NSEERS system and over 13,000 were placed in removal proceedings, yet the program resulted in no convictions for terrorism.<sup>14</sup>

Since taking office in January 2025, immigrants living in the United States have been subjected to immigration enforcement that tramples their due process rights under the guise of national security and public safety. The arrest and detention of activists exercising their First Amendment rights and the unlawful removal of immigrants to El Salvador under the Alien Enemies Act are examples of the actions taken by the Trump administration to inflict chaos, fear and harm on immigrant populations in the United States. The IFR at hand will only exacerbate these efforts and will result in the further decimation of rights enshrined in the U.S. Constitution. History has shown that registration campaigns are ineffective in keeping us safe and only result in harm to immigrant communities. DHS should rescind the IFR and the registration requirement found at 8 C.F.R. Part 264 in full.

### **A. Registration will more heavily and negatively impact vulnerable communities.**

Barriers exist to accessing the registration process for those individuals with limitations that make it difficult or impossible to comply with the requirements to register and carry proof of registration. The harsh criminal penalties that are contemplated by the IFR for non-registration do not take into account the inability of some impacted individuals to register through no fault of their own. The requirement to carry proof of registration will also harm vulnerable individuals as failure to carry proof is a misdemeanor punishable by a fine of up to \$5,000 or

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<sup>11</sup> 54 Stat. 60 (Pub. Law 76-670)/

<sup>12</sup> Densho, The Alien Enemies Act Paved the Way for Japanese American Incarceration, *Densho* (Oct. 17, 2024), <https://densho.org/catalyst/the-alien-enemies-act-paved-the-way-for-japanese-american-incarceration-lets-keep-it-in-the-past/>.

<sup>13</sup> Sharon Yamato, *Commission on Wartime Relocation and Internment of Civilians*, *Densho* (last accessed Mar. 26, 2025), [https://encyclopedia.densho.org/Commission\\_on\\_Wartime\\_Relocation\\_and\\_Internment\\_of\\_Civilians/](https://encyclopedia.densho.org/Commission_on_Wartime_Relocation_and_Internment_of_Civilians/).

<sup>14</sup> <https://www.cnn.com/2016/11/18/politics/nseers-muslim-database-qa-trnd/index.html>

*imprisonment* for not more than thirty days, or both. Registration will substantially curtail the rights of vulnerable populations:

Individuals with limited English proficiency and/or access to technology: Without the ability to file the form on paper, those without technological literacy or access to the technology required to register, will be exposed to the punitive ramifications enumerated in the IFR. Further, for those with limited English proficiency, there is an increased risk that those who are not required to register will do so inadvertently, thus opening the door to erroneous immigration enforcement actions.

Individuals with disabilities: Those persons with mental, developmental or health-related disabilities may not have the ability to carry documentation on them reliably and there may not be another person or family member available to ensure compliance with this requirement. This requirement will increase the chance that these particularly vulnerable individuals will be subject to law enforcement actions, incarceration, and, ultimately, removal from the United States without a meaningful opportunity to exercise their due process rights.

Children: The IFR's requirement that children register will result in confusion, erroneous registrations, and family instability and separation. Additionally, the IFR does not address how the enumerated criminal penalties will be assessed to children who may not be able to meet the requirements to register or carry proof of registration. This is particularly insidious considering the inconsistencies regarding the requirement that children under 14 years old be registered by a parent or guardian and whether or not they have to register again after turning 14. The rule dictates that children 14 years old and older must register themselves and that children under 14 years of age be registered by a parent or legal guardian. The onus of registration on a child who has not yet reached the age of 18 will impact the stability of the lives these children are leading in the United States. Similarly, parents will have to choose between circumventing the law or sharing sensitive information about their minor children with the federal government, which will impact the autonomy and stability of the family unit.<sup>15</sup> Further, confusion will ensue for unaccompanied children who are in the United States without a parent or caregiver and who may be in group housing situations. Even if unaccompanied minors are not required to register, the lack of clarity, information and guidance on the registration requirement may result in erroneous registration and ensuing enforcement.

Survivors of domestic violence, crime and human trafficking: Historically, immigration status and process have been manipulated and used by abusers against survivors of violence and the IFR's registration process will be no different. Perpetrators of violence could utilize the registration process to erroneously register survivors or interfere with a survivor's ability to complete the registration process, thereby intentionally opening up the survivor's vulnerability to criminalization and enforcement. A perpetrator may also interfere with a survivor's ability to carry proof of registration, exposing a violence survivor to enforcement under 8 U.S.C. 1304(e). Further, the IFR does not adequately explain how a person can utilize a safe address and ensure that their physical location will be kept confidential from past abusers. The IFR does not address the confidentiality protections provided for at 8 U.S.C. § 1367, thus raising the chance that a survivor's confidential information could be exposed, and, in turn, the survivor could be vulnerable to further victimization by their abuser or related parties.

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<sup>15</sup> The Department's determination that the implementation of this regulation will not negatively affect family well-being nor impact the autonomy and integrity of the family as an institution is erroneous and violates the requirements of section 654 of the Treasury General Appropriations Act, 1999 by failing to provide an adequate rationale for the Rule's implementation in light of its negative impact on family well-being.

## B. Registration Will Overburden an Already Overwhelmed Immigration Application System

DHS has not accounted for the actual costs that a registration process will inflict upon an already overburdened system. The IFR provides a thin assessment of the increased costs for biometrics collection, but does not address the strain on USCIS on processing.<sup>16</sup> There is no assessment of the costs to the agency in training on, reviewing and adjudicating a new form which the IFR acknowledges could be filed by over 3 million people.<sup>17</sup> Nor is there any account of the cost of redistributing personnel away from the critical work USCIS is already doing to administer the nations' immigration benefit system. The staff at USCIS is already overburdened and adding this responsibility to their workload will result in backlogs, processing delays and staff attrition.

Critically, the IFR does not account for the costs associated with the enforcement provisions of registration. After all, enforcement is the goal of the registration process regardless of whether a person subject to the requirement registers or not.<sup>18</sup> DHS's focus on criminal penalties for failing to register will require significant investment from federal law enforcement including increased costs for administration and personnel, training, and other resources. Further, the amorphous nature of "self-deportation" contemplated in the IFR will carry costs and resource needs not accounted for in the IFR itself. In addition, the invocation of 8 U.S.C. § 1304(e) that would institute criminalization for failing to carry proof of registration will result in arbitrary searches and arrests as well as racial profiling which will inevitably affect U.S. citizens as well as noncitizens. Profiling of this nature is already widespread, and the invocation of this provision will lead to further breakdown in trust between law enforcement and the public, endangering communities across the country.<sup>19</sup>

Finally, the rule fails to contemplate the cost to U.S. communities. The chilling effect of enforcement-heavy processes has been well documented.<sup>20</sup> Immigrant families subject to harsh enforcement penalties such as these will withdraw from everyday life for fear of criminalization. They will stop going to work, children will stop going to school, and they will stop engaging in community activities. This will, in turn, harm local communities and economies, making all of us less safe and stable.<sup>21</sup>

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<sup>16</sup> On a separate note, The IFR does not address the confusion that will ensue for thousands of people who have already completed biometrics associated with applications, but are not considered registered, such as U Visa applicants. Having these individuals complete biometrics again is wasteful and will add to the cost to the administrative strain on the agency.

<sup>17</sup> *Alien Registration Form and Evidence of Registration*, 90 Fed. Reg. 11,797 (Mar. 12, 2025) (to be codified at 8 C.F.R. pt. 264)

<sup>18</sup> See Sec. Noem's assertion that DHS seeks to "[compel] mass self deportation" with the registration requirement. <https://www.dhs.gov/news/2025/02/25/secretary-noem-announces-agency-will-enforce-laws-penalize-aliens-country-illegally>

<sup>19</sup> Tim Henderson, "Despite profiling concerns, more law agencies are joining street-level immigration enforcement," *Stateline* (Mar. 5, 2025), available at <https://stateline.org/2025/03/05/despite-profiling-concerns-more-law-agencies-are-joining-street-level-immigration-enforcement/>.

<sup>20</sup> American Immigration Council, "The Chilling Effect of Trump's Indiscriminate Immigration Arrests and Propaganda," *Immigration Impact* (Feb. 14, 2025) available at <https://immigrationimpact.com/2025/02/14/the-chilling-effect-of-trumps-indiscriminate-immigration-arrests-propaganda/#:~:text=The%20threat%20itself%20of%20aggressive,themselves%20or%20their%20loved%20ones.>

<sup>21</sup> See, e.g., Rebecca Davis O'Brien & Miriam Jordan, "A chill sets in for undocumented workers, and those who hire them," *N.Y. Times* (Mar. 9, 2025), available at <https://www.nytimes.com/2025/03/09/business/economy/immigrant-workers-deportation-fears.html>; Miriam Jordan et al., "Immigrant communities in hiding: 'People think ICE is everywhere,'" *N.Y. Times* (Jan. 30, 2025), available at <https://www.nytimes.com/2025/01/30/us/immigrant-communities-hiding-ice.html>.



### III. Conclusion

DHS asserts that a registration process is necessary to ensure “safety and security of our homeland” and that registration process is intended to “penalize [individuals] in the country illegally.”<sup>22</sup> These statements contradict the IFR’s rationale for skipping the notice and comment period; specifically that the IFR “does not alter the rights or interests of any party, or encode a substantive value judgment on a given type of private behavior.”<sup>23</sup> The inconsistent rationales put forth by DHS in the IFR - it is either an emergency that must be dealt with immediately to keep the public safe or it is a mere process change that will have no effect on the public - cannot withstand the scrutiny of the legal requirements contemplated in the APA, PRA and other federal law.

Despite the government’s protestations to the contrary, we see the IFR and registration process for what it is: a bludgeoning hammer aimed at harming immigrant communities to the fullest extent possible. This process does not include a measured analysis of the costs and benefits for registration, the effect on U.S. communities and the economy and the certain violations of the U.S. Constitution that will occur if the process is permitted to go into effect. The promulgation of this rule cannot stand, and the rule must be rescinded in its entirety.

Sincerely

*/s/Peggy Gleason*

Peggy Gleason

Senior Staff Attorney

Immigrant Legal Resource Center

*/s/Elizabeth Taufa*

Elizabeth Taufa

Senior Policy Attorney and Strategist

Immigrant Legal Resource Center

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<sup>22</sup> DHS, “Secretary Noem Announces Agency Will Enforce Laws That Penalize Aliens in the Country Illegally.” (Fe.b. 25, 2025), available at <https://www.dhs.gov/news/2025/02/25/secretary-noem-announces-agency-will-enforce-laws-penalize-alien-country-illegally>

<sup>23</sup> Alien Registration Form and Evidence of Registration, 90 Fed. Reg. 11,796 (Mar. 12, 2025) (to be codified at 8 C.F.R. pt. 264).