



# ABSENCES AND CONTINUOUS RESIDENCE

*Practice Advisory*

## I. Introduction

Absences from the United States can affect an applicant's eligibility for naturalization in numerous ways. An absence may: (1) demonstrate abandonment of lawful permanent resident status; (2) break the statutory period for continuous residence; (3) cause a lack of sufficient physical presence in the U.S.; (4) affect the three-month residence requirement in the applicant's district or state; and (5) may trigger issues of deportability. It is critical to analyze the effect of any absence through each of the five different analyses. In this practice advisory, we will focus specifically on how absences of varying lengths of time affect the continuous residence requirement.

### Greater Scrutiny of Continuous Residence

Before reviewing the elements of continuous residence, it is important to note the current landscape under which the United States Citizenship and Immigration Service (USCIS) evaluates continuous U.S. residence. A July 2020 report based on a survey of partners from the New Americans Campaign (NAC) found that almost a quarter of those surveyed have faced additional questions by USCIS officers about physical presence and continuous residence.<sup>1</sup> This often takes the form of additional questions during interviews, and more Requests for Evidence (RFE) to gather details about physical presence and continuous U.S. residence.<sup>2</sup> For example, one partner noted at least five cases where RFEs were issued to prove more than twenty years of continuous residence even though the statutory period to qualify for citizenship is only five years of residence (or three years if applying as the spouse of a U.S. citizen). Another NAC partner reported that an applicant was

asked for extensive evidence to explain a seven-month absence due to the Ebola crisis in Liberia. The applicant had to submit multiple declarations and news articles explaining the crisis preventing travel, which was more evidence than required in the past for this type of situation.<sup>3</sup> Another shared that an applicant received an RFE to explain her long absence from the United States when she was with her husband, who was overseas with the U.S. military. Others report that applicants were denied because they could not remember the exact dates of trips abroad.<sup>4</sup>

Due to these shifting standards, some applicants have to spend a considerable amount of time locating additional evidence, which increases the burden on applicants and their legal advocates.<sup>5</sup> The report notes that these issues occurred at USCIS offices nationwide, which suggests that USCIS may have provided instructions to its officers to adjudicate these matters more closely and/or there was a broad cultural shift within USCIS that led to greater scrutiny.<sup>6</sup>

This increased scrutiny is part of a broader effort to make the naturalization process more difficult by changing the adjudication standards and procedures for citizenship. These changes have led to an increased likelihood of denial based on extended absences, processing backlogs, and fewer instances of a favorable exercise of discretion. While these major changes deeply affect the naturalization process, and have likely contributed to the ever-increasing backlog, the overall naturalization approval rate during the current administration has not changed, and continues to hover near the ninety-percent mark.<sup>7</sup> Nonetheless, applicants should be prepared to provide additional evidence of time spent abroad if requested by USCIS.

## Breaks in Continuous Residence

The general rule is that naturalization applicants must demonstrate that they continuously resided in the United States for the last five years immediately prior to applying for citizenship.<sup>8</sup> For applicants applying as the spouse of a U.S. citizen, the continuous residence period is three years.<sup>9</sup> “Continuous” residence does not require that the person be physically present in the U.S. for every day, but that they maintain their dwelling place during that time. The Immigration and Nationality Act defines “residence” as a person’s “principal, actual dwelling place.”<sup>10</sup> USCIS has incorporated this definition into their guidance on meeting the continuous residence requirement.<sup>11</sup> Thus, just owning or renting property in the United States without actually living in the United States could create problems in demonstrating one’s continuous residence under this definition. The intent of the applicant does not matter.<sup>12</sup> USCIS updated its Practice Manual in August 2019 to clarify that temporary visits, vacations, or regular work in the U.S. alone are insufficient to establish residence.<sup>13</sup> But attendance at school, college, or university in the U.S. for an extended period of time may be considered as residence depending on the totality of circumstances.<sup>14</sup> A person is not required to live in a particular place for a specific period of time for that place to be considered their “residence.” However, the longer a stay in a particular place, the more likely it is that a person can establish that place as their residence.<sup>15</sup>

When an applicant travels out of the country for a certain amount of time during the five-year period, the applicant may break their continuous residence. Generally, USCIS evaluates the impact of an absence on continuous residence based on trips of different lengths:

1. Trips abroad for six months or less<sup>16</sup>;
2. Trips abroad for more than six months, but less than one year; and
3. Trips abroad for one year or more

### 1. Trips Abroad for Six Months or Less

The general understanding is that trips abroad for six months or less do not disrupt continuous residence.<sup>17</sup> Some courts have noted that one or even several temporary absences of less than six months likely will have little impact on a determination of continuous residence.<sup>18</sup>

It is important to note, however, that in July 2015, USCIS updated its Policy Manual to clarify that officers may still review whether multiple absences of less than six months may break continuous residence.<sup>19</sup> Thus, applicants may find that the agency scrutinizes even trips that last six months or less.<sup>20</sup>

Although rare, ILRC has seen two cases where this issue arose. In one case, USCIS denied the applicant for lack of continuous residence even though the applicant was gone for less than six months. The applicant was employed by a U.S. company and worked abroad. On her application, she stated that she had a physical address abroad during a temporary work reassignment, although maintained ownership of a property in the United States during the same period.

The applicant provided evidence of ownership of multiple properties in the United States, bank statements, employment verification by a U.S. company, and tax payments during the relevant period. Yet, USCIS explained that she provided no evidence of “services maintained,” and that neither she nor her spouse occupied their United States-based property during her absence. USCIS contended that she failed to establish that she maintained continuous residence in the United States while she maintained a physical residence outside of the United States. In other words, the U.S. did not remain her principal dwelling place during her absence. In its decision, USCIS cited the updated section of its Policy Manual that states that officers will still assess whether multiple absences of less than six months will negatively impact meeting the residence and physical presence requirements for naturalization.<sup>21</sup>

In a separate case from 2019, USCIS issued a Notice of Intent to Deny partially based on a failure to continuously reside in the U.S. due to two trips of less than six months abroad during the statutory period. In its notice, USCIS stated that any absences of less than six months may break continuous residence “depending on the facts surrounding the absence.”<sup>22</sup> USCIS noted that the applicant testified during his interview that he was living outside of the U.S. during two trips, and only stayed with friends during the contested periods. The applicant had only listed an address abroad during the trips. The applicant overcame the issue by providing a detailed letter, declaration, and supporting documents.

The letter explained that during the trips, he did not have a permanent address in the U.S. because he struggled to maintain continuous housing in the U.S. When he would return from his trips, he stayed in various homes registered under others' names due to his financial instability. The applicant also provided evidence that the trips abroad were required as part of his family's immigration process – to attend meetings at the U.S. embassy in his home country and to supply supporting documents. He returned to the U.S. as soon as possible after meeting the requirements related to those appointments. He also provided evidence of maintaining a U.S. bank account and ownership of a car in the U.S.

Based on the rationale presented in these decisions, it is possible that one interpretation of the USCIS Policy Manual is that if an applicant does not have a United States residence listed on their application for several months during the five-year statutory period, the applicant will not be found to have continuous residence in the United States. This is because their principal dwelling place for those few months was not in the United States.<sup>23</sup>

It is important to note that ILRC's survey of over 350 naturalization service providers revealed that none had seen a denial for trips of six months or less. Only one respondent reported receiving a notice of intent to deny partially based on trips of less than six months. But as explained above, they were able to overcome the notice with a letter explaining the lack of a U.S.-based address during the trips abroad, a sworn statement from the client detailing his necessary trips abroad, and supporting documents. Given the increased scrutiny of trips abroad during the naturalization process, applicants should be especially mindful of extended trips. The following tips may help ensure that others do not face a similar denial for trips of six months or less<sup>24</sup>:

- **List a concurrent United States residence:** If an applicant lists a foreign address in the naturalization application for any length of time, also include the applicant's United States residence during the same period if applicable. A P.O. box is not a residence. Failure to include a United States address may signal that the applicant was living outside the country without a principal dwelling place in the U.S. (Failure to list a U.S. address could also flag a possible intent to establish a residence abroad, even for

a brief period.) Encourage applicants to maintain a physical address in the United States during such planned absences.

- **Argue USCIS acted Ultra Vires to the Statute:** Ultra vires is a defense that generally is used to argue that an actor took action that fell outside the scope of his or her legal authority. In this case, it could be used to assert that a decision is void because USCIS went beyond its legal power to issue a decision contrary to the law as set out in the statute; that is, the Immigration and Nationality Act (INA) (i.e., that trips of six months or less disturb continuous residence).

*When would you argue ultra vires?* This defense may be available in federal court *after* USCIS both denies an initial application and issues a denial notice after the reexamination.<sup>25</sup>

*What is the argument?* USCIS is charged with implementing the laws set out by congress. Congress enacted the INA, and specifically the provisions of INA section 316(b), which specifies how absences from the United States impact establishing continuous residence. Any finding that determines a trip of six months or less breaks continuous residence goes against the language of the statute. Essentially, USCIS crossed the line from permissible statutory interpretation by the responsible agency to an *ultra vires* decision contrary to the clear intent of Congress.

INA § 316(b) only places limitations on trips of over six months. Under the statutory interpretation principle of “expressio unius” or “the inclusion of one thing implies the exclusion of the other,” INA § 316 expressly set forth certain periods that trigger a presumption of a break in continuous residence – trips over six months. If Congress wanted to limit trips of six months or less, it would have done so. Denying naturalization for lack of continuous physical presence for trips of six months or less, a period not explicitly addressed in the statute, would go against congressional intent. For USCIS to reach beyond the statute to include periods not mentioned is *ultra vires* to the statute and outstrips USCIS's legal authority. In other words,

USCIS exceeded the scope of its authority by coming to a decision that was contrary to the text of INA § 316.

While one could make the ultra vires argument, it is important to note that two district court cases have indicated that it may not be successful. Two courts have found that while INA §316 only presumes a break in continuous residence for absences longer than six months, the statute and regulations do not preclude finding a break in residence outside of those circumstances (i.e., where trips did not exceed six months).<sup>26</sup> In one district court case that was affirmed by the Eleventh Circuit, the court found that the applicant broke continuous residence even though he technically complied with the statute by returning to the U.S. on multiple occasions before the six-month presumptive time limit. This is because he maintained a primary residence in Pakistan with his wife and growing family, only sporadically worked in the U.S., failed to file taxes in the U.S. for several years, did not rent or own property in the U.S., and would live in his parents' home in Miami during his trips to the U.S.<sup>27</sup>

## 2. Trips Abroad for More Than Six Months, But Less Than One Year

The presumption is that trips of more than six months, but less than one year, disrupt an applicant's continuous residence.<sup>28</sup>

USCIS updated its Policy Manual in February 2020 to clarify that applicants absent for more than six months but less than one year must overcome the presumption that the continuity of residence has been broken to remain eligible for naturalization.<sup>29</sup> An applicant who has broken the continuity of residence must establish a new period of continuous residence. To overcome this presumption, an applicant should present evidence that the trip, although longer than six months, but less than one year, was indeed temporary and that the applicant retained ties with the United States throughout the relevant period.

Evidence of all the following would be important to provide to rebut the presumption:

- (1) continuing employment in the United States;
- (2) immediate family remaining in the United States during the applicant's time abroad;
- (3) retention of full access to the applicant's residence in the United States (whether owned or leased);
- (4) that the applicant did not find a new job while abroad.
- (5) an IRS tax return transcript or an IRS-certified tax return listing tax information relevant to the absence during the statutory period;
- (6) rent or mortgage payments and pay statements;
- (7) bank, credit card, and loan statements showing regular transactions;
- (8) proof of car registration and insurance; or
- (9) copies of passport showing entry and exit stamps.<sup>30</sup>

*Alvear v. Kirk*, 87 F.Supp.2d 1241 (D. New Mexico, 2000), illustrates how specific the evidence of continuous residence may need to be to overcome the presumption. In *Alvear*, the court found that the applicant failed to overcome the presumption that his trips of longer than six months did not break his continuous residency even though Mr. Alvear provided evidence of multiple purchases of property in the United States, evidence of his children's birth and residence in the country, and his current residence in New Mexico. The court found this insufficient because Mr. Alvear did not indicate how long he lived at his current residence, and included no proof of his actual physical residence or principal dwelling place in the United States during the five-year statutory period. Although Mr. Alvear could establish his physical presence in the United States during the statutory period, "he [did] not establish the whereabouts of his *actual* residence." *Id.* at 1243 (emphasis in original). Thus, if you think an absence of more than six months, but less than a year might cause the USCIS to deny for lack of continuous residence, it may be helpful to provide specific proof with exact dates of residence during the statutory period to overcome the presumption.

How long should an applicant wait before they can re-apply for naturalization if their absence of over six

months, but less than one year disrupts their continuous residence?

The regulations do not provide a clear answer to this question. If USCIS finds that the applicant's trip of over six months, but less than one year, does break their continuous residence, the February 2020 update to the USCIS Policy Manual notes that they must wait at least six months from reaching the five (or three) year anniversary of the newly established statutory period following the applicant's return to the U.S. Another way to look at is that one must wait four years and six months from when they returned to the United States until they can become eligible for naturalization again.

**Example:** Caden is absent from the U.S. for nine months, and returns on June 18, 2020. If they are unable to overcome the presumption that they broke their continuous residence, the five-year statutory period now begins on June 18, 2020, when they returned to the U.S. Thus, the earliest Caden may now re-apply for naturalization is December 18, 2024, which is at least six months from the five-year anniversary of their return.

### 3. Trips Abroad for One Year or More

Trips abroad of one year or more during the statutory period will always break an applicant's continuity of residence. (Please note, however, that there are a number of exceptions to this rule. Those exceptions include absences because of participation in the United States armed forces, and absences created due to the applicant receiving misinformation by USCIS. Chapter 5, Section 5 of the ILRC's *Naturalization and the U.S. Citizenship Manual* provides a list of exceptions to disruptions of one year or more.) The Second Circuit has held that the one-year absence bar applies both to the period preceding and the period following the naturalization interview.<sup>31</sup>

Unlike with absences of over six months, but less than one year, USCIS will not consider evidence of employment, family residence, or access to the applicant's United States home to overcome the break of one year or more.

As mentioned above, a lawful permanent resident with a disruption of continuous residence of one year or more only needs to wait **four years and one day** (or two years and one day if applying as the spouse of a United States citizen) after the date they return to the United States to file their naturalization application.

**Example:** Marta was lawfully admitted for permanent residence in May 2010. Marta wants to apply for naturalization. In talking about the requirements for naturalization with her advocate, Marta states that she took a trip to Chile, leaving on February 15, 2016 and returning to the United States on May 3, 2018. Because Marta was gone from the United States for more than one year, she will be found to have disrupted her continuous residence. Thus, Marta must wait four years and a day from the date she returned from her trip abroad before applying for naturalization. Marta cannot apply for naturalization until May 4, 2022.

Note that Marta might have issues with abandonment of residence, which is different from disruption of residence, as she was gone for a significant amount of time. For more information on abandonment of residence, please see Chapter 4 of the ILRC's *Naturalization & U.S. Citizenship* manual.

This special rule also applies to applicants who have a **three-year residence requirement** because they are applying as the spouse of a U.S. citizen. If the applicant has been a permanent resident for at least three years, but has disrupted continuous residence because they were absent for one year or longer, they may file their naturalization application **two years plus one day** after they return to the United States from a trip that disrupted continuous residence.<sup>a</sup>

**Example:** Laura has been a permanent resident since September 17, 2012. She has been married to a U.S. citizen since that time. Laura took a trip to visit her ill grandfather in Taiwan from December 12, 2018 through January 3, 2020. Laura and her lawyer determine that although she has a strong argument that she did not abandon her permanent residence during her stay in Taiwan, she did disrupt her continuous residence because she was absent from the United States for more than one year. Laura must

<sup>a</sup> See 8 C.F.R. § 316.5(c)(1)(ii).

start counting her continuous residence from the date she returned to the United States—January 3, 2020. However, because she is married to a U.S. citizen, Laura only needs to wait **two years plus one extra day** before filing. USCIS will count the “one extra day” as the entire third year, since theoretically Laura could be absent for the rest of that year (364 days) and still not automatically disrupt her continuous residence. Therefore, the earliest date Laura can file her naturalization application is January 4, 2022, two

years and a day after she returned to the United States.

Finally, any removal (or deportation) from the United States, or absence while under an order of deportation, exclusion, or removal, will terminate an applicant’s status as a lawful permanent residence, and prevent the applicant from meeting the residence requirement for naturalization.<sup>32</sup> There is an exception, however, for those in the armed services.<sup>33</sup>

## End Notes

---

<sup>1</sup> Migration Policy Institute, *A Rockier Road to U.S. Citizenship? Findings of a Survey on Changing Naturalization Procedures*, 2 (July 2020), <https://www.migrationpolicy.org/research/changing-uscis-naturalization-procedures>.

<sup>2</sup> *Id.* at 15.

<sup>3</sup> *Id.* at 17.

<sup>4</sup> *Id.*

<sup>5</sup> *Id.* at 2.

<sup>6</sup> *Id.* at 21.

<sup>7</sup> *Id.* at 23-4 (In the last quarter of fiscal year 2019, USCIS approved 246,000 naturalization applications and denied 26,000, for an approval rate of ninety percent. Since fiscal year 2010, the rate has ranged from eighty-nine to ninety-two percent).

<sup>8</sup> INA § 316(a)(1). Please note that members of the U.S. armed forces may be eligible to naturalize with modified or waived continuous residence requirements. To learn more about the various exceptions to the 5-year rule, including the armed forces exception, please refer to Chapter 5, Section 3(C) of ILRC's Naturalization and U.S. Citizenship Manual.

<sup>9</sup> INA § 319. The naturalization applicant needs to have lived in the United States for three years as a lawful permanent resident prior to qualifying for naturalization, and must have been married to and living with her U.S. citizen spouse for at least three years, and the spouse must have been a U.S. citizen for the entire three years. Note that the statutory period is also three years for applicants who obtained status because they were battered or subjected to extreme cruelty by a United States citizen spouse or parent (INA § 319(a)).

<sup>10</sup> INA § 101(a)(33).

<sup>11</sup> 12 U.S. Citizenship and Immigration Services Policy Manual (USCIS-PM) D(3)(A) and (C) <https://www.uscis.gov/policy-manual/volume-12-part-d-chapter-3>.

<sup>12</sup> INA § 101(a)(33).

<sup>13</sup> USCIS, *Policy Alert: Defining "Residence" in Statutory Provisions Related to Citizenship* (Aug. 28, 2019), <https://www.uscis.gov/sites/default/files/document/policy-manual-updates/20190828-ResidenceForCitizenship.pdf>; see also 12 USCIS-PM H.2(F).

<sup>14</sup> *Id.*

<sup>15</sup> 12 USCIS-PM H.2(D).

<sup>16</sup> Note that while INA § 316(b) clearly states that absences of "more than six months" are relevant to disruptions of continuous residence, the regulations confuse the matter by defining the same period as "between six (6) months and one (1) year." (8 CFR 316.5). In comparison, the USCIS Practice Manual states that the relevant period is "absences of more than 6 months but less than one year." Although 8 CFR 316.5 includes six months in its discussion of absences that are presumed to break continuous residence, we believe the regulations should be read consistently with the statute and the USCIS Policy Manual which are clear that a trip of six months does *not* disrupt continuous residence. See 12 USCIS-PM D.3(C).

<sup>17</sup> Although absences of six months or less usually do not endanger continuous residence, being abroad for any length of time, including for less than six months, could place the applicant in danger of abandoning her residence if she intended to move her home to another country. Therefore, it is important to analyze all trips of any length through each of the absences analyses. Please refer to ILRC's Naturalization and U.S. Citizenship Manual, Chapter 4, Section 7 for more information.

<sup>18</sup> See *Alvarez-Garcia v. Ashcroft*, 293 F.3d 1155, 1158 (9th Cir. 2002); *Iqbal v. USCIS*, 397 F. Supp. 3d 273, 283 (W.D.N.Y. 2019). Although the court ultimately found that the applicant did not have continuous residence, it acknowledged that "one or even several temporary absences of less than six months in duration would likely have little impact on whether an applicant has 'resided continuously within the United States ... up to the time of admission to citizenship.'" *But see Sharma v. U.S. Dep't of Homeland Sec.*, 2009 WL 10697616, at \*3 (S.D. Tex. Sept. 11, 2009) ("While 8 U.S.C. § 1427 assumes a break in continuity of residence in specific scenarios (e.g., absences longer than six months), it does not preclude a finding of a break in residency absent those circumstances.")

<sup>19</sup> 12 USCIS-PM D.3(C).

<sup>20</sup> See 12 USCIS-PM D.3(C) ("An officer may also review whether an applicant with multiple absences of less than 6 months will be able to satisfy the continuous residence and physical presence requirements. In some cases, an applicant may not be able to establish that his or her principal actual dwelling place is in the United States or establish residence

within the United States for the statutorily required period of time.”) (citing 8 C.F.R. § 316.5(a)). Note that someone who takes frequent trips, returning only for a couple days within six months, might also raise questions of abandonment.

<sup>21</sup> *Id.* (“An officer may also review whether an applicant with multiple absences of less than six months will be able to satisfy the continuous residence and physical presence requirements. In some cases, an applicant may not be able to establish that his or her principal actual dwelling place is in the United States or establish residence within the United States for the statutorily required period of time.”) (citing 8 CFR 316.5(a)).

<sup>22</sup> USCIS Notice of Intent to Deny (Aug. 29, 2019), on file with the ILRC.

<sup>23</sup> 8 CFR 316.5(a); 12 USCIS-PM D.3(A) and (C).

<sup>24</sup> One additional tip to consider is filing a Form N-470 if a client plans to relocate abroad temporarily for a short-term work assignment if the relocation could last longer than one year. An approved N-470, Application to Preserve Residence for Naturalization Purposes, will preserve the client’s residence for a future naturalization application. (This process is distinct from, and in addition to, obtaining a Reentry Permit (Form I-131), which does not prove that a person did not disrupt her continuous residence for naturalization.) Generally, the N-470 is only necessary for individuals who will be absent from the United States for one year or more. However, given the revised guidance in the Policy Manual, it may also protect those who planned to work abroad for longer than a year, but ultimately returned before the year ended. To qualify for the N-470, an applicant must demonstrate that their work falls into “certain employment purposes,” such as working for the U.S. government, or an American company that engages in foreign trade of the United States, among other requirements. Please refer to ILRC’s Naturalization and U.S. Citizenship Manual, Chapter 5, Section 5 for more details on preserving residence with an N-470. Although an N-470 may preserve residence, it does not relieve the applicant from meeting the physical presence requirement for naturalization, unless the applicant is employed by, or under contract with, the U.S. government. INA § 316(c).

<sup>25</sup> N-336 is the form to submit a request for a hearing on a naturalization decision, which is available at: <https://www.uscis.gov/n-336>.

<sup>26</sup> *Khan v. USCIS*, 2019 WL 1323688, at \*5 (S.D. Fla. Mar. 25, 2019), *aff’d*, 781 F. App’x 977 (11th Cir. 2019); *Sharma v. U.S. Dep’t of Homeland Sec.*, 2009 WL 10697616, at \*3 (S.D. Tex. Sept. 11, 2009) (“While 8 U.S.C. § 1427 assumes a break in continuity of residence in specific scenarios (e.g., absences longer than six months), it does not preclude a finding of a break in residency absent those circumstances.”).

<sup>27</sup> *Khan*, at \*5.

<sup>28</sup> INA § 316(b); see also 12 USCIS-PM D.3(C)(1).

<sup>29</sup> USCIS, *Policy Alert: Effect of Breaks in Continuity of Residence on Eligibility for Naturalization* (Feb. 26, 2020), <https://www.uscis.gov/sites/default/files/document/policy-manual-updates/20200226-BreaksInContinuousResidence.pdf>.

<sup>30</sup> 8 CFR § 316.5(c)(1)(i). The documents submitted should also include the address of the applicant’s United States residence, and not a P.O. Box. *Abulkhair v. Bush*, 2010 WL 2521760 (D.N.J. June 14, 2010), *aff’d*, 413 F. App’x 502 (3d Cir. 2011) (affirming the district court’s finding that the applicant failed to establish continuous residence after he provided “some cancelled checks, a copy of a 2003 gas bill, some indication that he had filed some federal income tax returns, and various other documents”); see also USCIS Notice of Intent to Deny (Aug. 20, 2019), on file with the ILRC

<sup>31</sup> See *Gildernew v. Quarantillo*, 594 F.3d 131 (2d. Cir. 2010).

<sup>32</sup> 8 CFR § 316.5(c)(3).

<sup>33</sup> This provision does not apply to people who are applying for naturalization under special rules for those in the armed services. See INA §§ 328, 329.





**San Francisco**

1458 Howard Street  
San Francisco, CA 94103  
t: 415.255.9499  
f: 415.255.9792

[ilrc@ilrc.org](mailto:ilrc@ilrc.org) [www.ilrc.org](http://www.ilrc.org)

**Washington D.C.**

1015 15th Street, NW  
Suite 600  
Washington, DC 20005  
t: 202.777.8999  
f: 202.293.2849

**Austin**

6633 East Hwy 290  
Suite 102  
Austin, TX 78723  
t: 512.879.1616

**San Antonio**

500 6<sup>th</sup> Street  
Suite 204  
San Antonio, TX 78215  
t: 210.760.7368

**About the Immigrant Legal Resource Center**

The Immigrant Legal Resource Center (ILRC) works with immigrants, community organizations, legal professionals, law enforcement, and policy makers to build a democratic society that values diversity and the rights of all people. Through community education programs, legal training and technical assistance, and policy development and advocacy, the ILRC's mission is to protect and defend the fundamental rights of immigrant families and communities.