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⁴ Kids in Need of Defense,

Family Members Endangers Children (2017) (KIND, Targeting Families) at 8.

⁵ National Immigrant Justice Center et al., Complaint to the Department of Homeland Security Office of Civil Rights & Civil Liberties, Dec. 6, 2017 (NIJC Complaint) at 8-9; KIND,

KIND, *Targeting Families*, at 12.

⁷ Uriel J. Garcia, "ICE arrests young immigrant's sponsor months after feds assured

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