



A View from the Bench by the National Association of Immigration Judges

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On May 12, 2016, Judge Denise Noonan Slavin presented “View from the Bench” at the 19th annual FBA Immigration Law Conference. She spoke in her capacity as executive vice president of the National Association for Immigration Judges (NAIJ). Along with fellow NAIJ officer Judge Dorothy Harbeck, she prepared this article to memorialize the remarks given at that panel. The judges wrote this article in their NAIJ capacities and not as employees of the USDOJ-EOIR.

What is the view from the immigration court bench? Frankly, it is difficult to see anything because there are so many cases! As of January 2016 there were 474,025 cases pending with the U.S. immigration courts.¹ With about 250 immigration judges who hear cases nationwide, each judge has an average caseload of about 1,900 pending cases. This number is not likely to get better anytime soon. The immigration courts have been under-resourced for well over a decade. In 2006, former Attorney General Alberto Gonzales recognized the need to hire immigration judges and staff as a critical element to his 22-point reform plan,² but no such hiring occurred for over three years because of the Department of Justice (DOJ) hiring freeze. Even when immigration judges retired or otherwise left the bench, replacement judges were not hired. So not only was the goal of hiring more immigration judges abandoned, the number of immigration judges declined as the number of cases increased, the number of initiatives for removal of immigrants out of status

increased, the law became more complex, and detention facilities became more overcrowded.

The good news? The Executive Office for Immigration Review (EOIR) *is* hiring—but the process is slow and judges continue to regularly retire. In fact, about half of current immigration judges are eligible to retire.³ While the rate of retirement is relatively low at this time, given the stress that judges are under⁴ and the failure of the EOIR to implement programs such as phased retirement, there’s no guarantee that the low retirement rate will continue. Well performing and properly supported immigration judges are the foundation of the immigration courts’ efficiency. Unfortunately, even the best employees cannot perform without responsible management, proper direction, support, tools, and resources.⁵ EOIR has typically been reactive rather than proactive in resource planning. There has never been a time when EOIR has looked into the future to predict caseload trends and resource needs.

The caseload growth rate over the past five years has been exponential—as documented by Syracuse University’s Transactional Records Access Clearinghouse. The difficulty in addressing this rising need has been dramatically increased by continued attrition in the employee ranks (both judges and clerical support staff). One of the problems we have had in keeping staff is the fact that in some locations our staff is not paid comparably to Department of Homeland Security (DHS) staff, so we lose them due to the pay differential. The transition to a new contractor for language services has been exceedingly disruptive and has resulted in no-shows and less qualified interpreters because the pay and working conditions (e.g., minimum hours, etc.) have been less favorable, causing better qualified individuals to seek other employment. The failures caused by obsolete technology have also contributed to a reduction in productivity. Our digital audio recording system frequently has issues

and the video teleconferencing equipment used for detained courts has recurring issues and causes headaches and ergonomic problems for those assigned to use the equipment for extended periods.

The immigration courtrooms also are so overcrowded it is difficult for anyone to see the judge! If you've been in a building housing an immigration court recently, you've probably seen people spilling out into the hallways waiting for their court hearings. This is not just because of the large number of cases; it is because we have not adjusted the size of courtrooms for how we do business. The size of the courtrooms was determined decades ago and has not been changed.

However, not only has the number of cases we hear increased,⁶ but the types of cases we are hearing also has changed. When the court schedules 20 children to appear on a master calendar, it's not just 20 people that come into court; it's 20 children, each with a

The IAALS provides these better practices as our recommendations for effective judicial performance evaluation:

- Performance evaluations of individual judges should be conducted on a regular basis and be publically disseminated and based on criteria generally understood to be characteristics of a good judge:
 - > Command of relevant substantive law and procedural rules
 - > Impartiality and freedom from bias
 - > Clarity of oral and written communications
 - > Judicial temperament that demonstrates appropriate respect for everyone in the courtroom
 - > Administrative skills, including competent docket management
 - > Appropriate public outreach

Unfortunately, it's difficult again to determine how the judges are seen by the public we serve. In a 2006 announcement, instituting performance reviews of immigration judges, Attorney General Gonzales stated that, while the "vast majority [of immigration judges] did their jobs well 'under pressures that would try even the most patient among us,'" some judges on "rare occasions" behaved in an "inappropriate" manner toward people in court.

guardian, some with siblings, and hopefully most with lawyers. The court also allows pro bono attorney organizations to come into the courtroom before court begins to give short presentations so that the children and their guardians can learn about their rights and how they may be able to find an attorney. So courtrooms designed to have 20 people appear at one time are now expected to hold 60 or more people. It just doesn't work! However, since the courts are within an executive agency attempting to "freeze the footprint" of government offices, we are prohibited from requiring more space. In fact, EOIR was one of the DOJ agencies that reduced its footprint (in headquarters' offices), resulting in space, now presumably used by other DOJ agencies, that could have been used to increase courtroom sizes.⁷ However, the need to increase courtroom sizes does not even appear to be on the radar for immigration court management.

And what is your view of the immigration judges? Unfortunately, it's difficult again to determine how the judges are seen by the public we serve. In a 2006 announcement, instituting performance reviews of immigration judges, Attorney General Gonzales stated that, while the "vast majority [of immigration judges] did their jobs well 'under pressures that would try even the most patient among us,'" some judges on "rare occasions" behaved "inappropriate" toward people in court.^{8,9} The review process that was set up does not seek input from parties appearing before the court. Rather than follow various models for evaluating judicial performance, the DOJ approached performance reviews for immigration judges using the traditional federal employee model. These reviews are subject to privacy laws and not available to the public. This is contrary to proposed models such as the University of Denver's Institute for Advancement of the American Legal System (IAALS) and by the National Center for State Courts.

- Evaluations should be completed by people who have interacted with the judges in the courtroom and in the office.
- The entity responsible for administering the process should be viewed as independent from other entities in performing its role.

Like judicial nominating commissions, the members of a judicial performance evaluation commission should be selected by multiple appointing authorities and be composed of a majority of lay members. It should reflect diversity; be politically, ideologically, and geographically balanced; and the terms of its members should be staggered.

As part of the evaluation program, judges should receive regular training. In addition to basic and broad judicial education, education programs should be tailored to the extent possible to the areas in which judges have been found wanting in their respective performance evaluations.¹⁰

Adopting this model in the immigration court system would mean that the lawyers and parties would be the individuals evaluating judges, these evaluations would be public, and judges would receive training on the areas where the parties believe they need help. This makes much more sense than our current Star Chamber¹¹ approach.

The public also has a foggy vision, at best, of the system for filing and processing complaints against immigration judges. The EOIR has a system for filing complaints against judges.¹² However, that process is far from transparent. Since the EOIR treats judges as "employees," its complaint processing system is subject to privacy laws. This is contrary to how most judicial conduct commissions work. Such commissions exist in all 50 states in order to "maintain and restore public confidence in the integrity, independence, and impartiality of their judiciary."¹³ The public is protected by being "kept informed of

judicial transgressions and their consequences, so that it knows that its government actively investigates allegations of judicial misconduct and takes appropriate action when these allegations are proved. Judicial discipline thus protects the public by fostering public confidence in the integrity of a self-policing judicial system.”¹⁴ The EOIR complaint system does not foster public confidence because the public does not know about it.

While some data about complaints against immigration judges was released in a lawsuit brought under the Freedom of Information Act,¹⁵ that data is misleading. Unlike most judicial conduct commissions, most of which release formal charges, the judge’s answer, and subsequent proceeding once there is probable cause to believe a judge has committed misconduct,¹⁶ the data released in response to the FOIA lawsuit did not have to meet any “probable cause” threshold. Thus, the release includes frivolous and clearly meritless complaints, which makes EOIR appear as if it does more policing of judges than it actually does. In addition, the documents released show only EOIR’s side of the story. For example, the judge’s responses to complaints are not released. This one-sided release of information has hidden the flaws in the EOIR complaint and disciplinary process.

The immigration courts have suffered from the appearance of unfairness for a long time. The public skepticism and lack of respect for the immigration court process is attributable in part to the court’s lack of independence from the DOJ, considering such debacles as the politicized hiring of immigration judges between 2004 and 2008 and the alleged politically motivated purge of the Board of Immigration Appeals (BIA).¹⁷ In addition, the DOJ’s hiring practices tend to favor hiring individuals who have government jobs, including jobs that are “adversarial to immigrants,”¹⁸ which gives the public the perception that the cards are stacked against them before they even come into court. Finally, there are “fairly rampant” allegations of ex parte communications between judges and DHS prosecutors.¹⁹ It’s not surprising that we suffer from this bad reputation, given the lack of transparency of judicial evaluations and our complaint process.

The sophistication of the cases has also changed. The definitions of what constitutes a particular social group (PSG) for asylum purposes are an example of the ever-changing nature of refugee law. The interface between criminal law and immigration law continues to generate circuit court appeals and complex legal analysis is more frequently required. This evolution in our governing statute and case law has resulted in more motions to reopen, which must be individually addressed.

Recent areas of case law activity surround claims of asylum based on gang activity and also based on domestic violence situations. The BIA recently held that an applicant for asylum and withholding of removal-seeking relief based on “membership in a particular social group” must establish that the group is: (1) composed of members who share a common immutable characteristic, (2) defined with particularity, and (3) socially distinct within the society in question.²⁰ “Social distinction” is defined by the perception of the society, not the perception of the alleged persecutor(s). The BIA made clear that both “particularity” and “social distinction” are analyzed in the specific context of the society at issue in each case.²¹ In a different case, the BIA held that depending on the facts and evidence in an individual case, “married women in Guatemala who are unable to leave their relationship” can constitute a cognizable PSG that forms the basis of a claim for asylum or withholding of removal.²²

The BIA held that:

the ‘social distinction’ requirement considers whether those with a common immutable characteristic are set apart, or distinct, from other persons within the society in some significant way. In other words, if the common immutable characteristic were known, those with the characteristic in the society in question would be meaningfully distinguished from those who do not have it. A viable [PSG] should be perceived within the given society as a sufficiently distinct group. The members of a [PSG] will generally understand their own affiliation with the grouping, as will other people in the particular society.”²³

“The focus of the particularity requirement is whether the group is discrete or is, instead, amorphous.” “Persecutory conduct aimed at a social group cannot alone define the group, which must exist independently of the persecution.”²⁴ The BIA further noted that the respondent’s proposed PSG “lacks particularity because it is too diffuse, as well as being too broad and subjective.” “The boundaries of a group are not sufficiently definable unless the members of society generally agree on who is included in the group, and evidence that the social group proposed by the respondent is recognized within the society is lacking in this case.”²⁵

The addition to our dockets of large numbers of cases involving juveniles has altered the landscape of our caseloads. From the perspective of practicalities, because of their vulnerabilities and lack of full competency, cases involving children must be conducted in a different manner than those of adults. It can be especially challenging to effectively communicate to minors the complicated nuances of our law, as well as the possible remedies that may be available to them. Judges must put minors at ease in an inherently stressful and unfamiliar setting. These precautions are not solely for the benefit of the minor, but are a practical necessity for a judge in order to obtain the information necessary to arrive at a fair and accurate result based on a true understanding of the child’s situation. To do so an atmosphere of trust must be established and a rapport developed which ensures that the minor is both emotionally able and psychologically willing to discuss issues that may be embarrassing, shameful, or traumatizing. In order to accomplish this, a judge frequently has to take more time with a child than they would in an adult’s case in order to make the child feel sufficiently safe so as to fully participate in the hearing. This often involves multiple hearings so that familiarity with the people, location, and general process can ease tensions and inspire confidence.

Another way the case law has changed has been the recognition of the need to address mental competency issues in a more structured manner. The BIA recognized that if there are indicia of mental incompetency that a judge must conduct a formal competency hearing to evaluate both possible impairment and any potential safeguards to ensure due process if impairment is found.²⁶ Obtaining old medical records or securing new mental status evaluations can be very time consuming and can require multiple continuances on occasion. Some of the safeguards contemplated involve additional time and effort from the judge. This includes docketing or managing the case to facilitate the respondent’s ability to obtain a lawyer or to get medical treatment to restore competency, continuing cases as needed for fatigue or stress, actively aiding in the development of the record, and reserving appeal rights.²⁷

Jurisprudence regarding custody and detention is also rapidly changing. The review of mandatory detention of respondents and their eligibility for having a bond set is also an area that has increasingly required enhanced court time and review. The First, Second, Third, Sixth, and Ninth Circuits now require bond hearings on a more frequent basis so detentions do not become indefinite, placing severe strain on the dockets in those circuits.

The Third Circuit has held²⁸ that in mandatory custody pre-removal situations, the Constitution mandates that the government establish the necessity of continued detention. In these instances, the government bears the burden of proof.²⁹ This does not obligate the immigration court to grant bonds in all instances; it requires the court to have a bond hearing. The *Diop* decision does not state a specific length of pre-removal order detention beyond which a petitioner may be entitled to a hearing. Instead, the *Diop* court noted that “reasonableness, by its very nature, is a fact dependent inquiry requiring an assessment of all the circumstances of a particular case.”³⁰ Subsequently, the Third Circuit commented that “the constitutional case for continued detention without inquiry into its necessity becomes more and more suspect as detention continues past [certain] thresholds.”³¹ The First and Sixth Circuits both have followed this line of reasoning.³² The Second Circuit has a different view.³³ The Second Circuit adopted a bright-line approach to pre-removal detention whereby an alien must be afforded a bond hearing within six months of detention. The Ninth Circuit view is similar to the Second Circuit.³⁴ The Ninth Circuit has held that immigration judges have to provide bond hearings periodically at six-month intervals for noncitizens detained for more than 12 months.³⁵

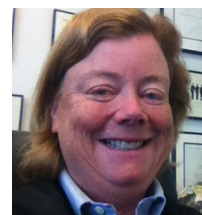
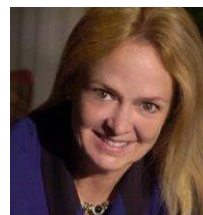
However, the bottom line is that while it is currently possible to anecdotally discuss caseload changes, it is impossible to analyze workload changes without some type of weighted caseload index.

So how do we solve these problems? Clearly, the court needs more resources: more judges, more judicial law clerks, and more staff to deal with both the current backlog and the continuing increase in cases. The courtrooms need to be larger and more child-friendly to safely accommodate the changing and increasing caseload. And we need to change the complaint and evaluation systems to more closely approximate that of other courts, which would include providing for stakeholder input on performance of judges, and most importantly, providing for a transparent complaint process.

None of the changes proposed here will be lasting unless we change the structure of the immigration court. Pouring more resources into the court would be akin to putting more gas in a car with a leaking gas tank. More resources will provide a momentary cure, but adding more resources will not address the problem with how we got to the point we lacked the necessary resources in the first place. More importantly, as the Federal Bar Association’s own Tara Lundstrom put it, “Money can’t buy fairness.”³⁶ The current placement of the immigration court within a federal law enforcement agency does not allow for adequate resourcing or a transparent and fair complaint and evaluation process—but even worse, the law enforcement mission of the DOJ cannot be reconciled with the immigration court’s mission “to adjudicate immigration cases in a careful and timely manner ... while ensuring the standards of due process and fair treatment for all parties involved.”³⁷ Simply stated, the law enforcement mission of the DOJ is detrimental to judicial independence. I’m sure you are all familiar with allegations that Attorney General John Ashcroft culled liberals from the BIA in

2003,³⁸ but there have been more recent examples of interference with judicial independence. In 2012, the DOJ forced Immigration Judge A. Ashley Tabaddor to recuse herself from all cases involving Iranian-Americans solely because of her Iranian-American heritage and prominence as a role model in the Iranian-American community. While the case ultimately settled favorably for Judge Tabaddor, “such actions send a strong message to immigration judges who strive to decide cases based on their fair application of the law to the facts in the cases in front of them.”³⁹ As one of our colleagues put it, we often feel that we are “U.S. imitation judges.”

The solution to addressing these problems in and taking a more proactive approach for the immigration courts would be to create an independent agency or Article I court. Such restructuring would decrease caseload burdens and provide more judicial independence.⁴⁰ “The way to restore balance and faith in the system is to provide safeguards at the trial level, which will restore public confidence.... Not only is independence in decision-making the hallmark of meaningful and effective review, it is also critical to the reality and the perception of fair and impartial review.”⁴¹ Restructuring the immigration court to remove it from the DOJ and make it an independent agency or Article I court has been endorsed by virtually every organization who has considered the matter, such as the American Bar Association, the American Immigration Lawyers Association, the American Judicature Society, the Appleseed Foundation, the National Association of Women’s Judges, and the Federal Bar Association.⁴² The NAIJ has been happy to have the FBA as a partner in lobbying for an Article I court. Until that vision is realized, the view from or of the immigration court bench won’t be a pleasant one. ☉



Hon. Denise Noonan Slavin is executive vice president of the National Association of Immigration Judges (NAIJ), a component of the International Federation of Professional and Technical Engineers

(IFPTE). Judge Slavin was appointed as an immigration judge in April 1995. Prior to her appointment, she was a prosecutor in DOJ’s Criminal Division on denaturalization and deportation of World War II era Nazi-collaborators, an INS trial attorney, and a prosecutor of civil rights complaints at the administrative level for the State of Maryland. Judge Slavin is a member of the Maryland Bar and has been admitted to the U.S. Supreme Court. She received her B.A. from the University of Maryland Baltimore County and her J.D. from the University of Maryland at Baltimore Law School. She has written numerous articles regarding working conditions in the Immigration Court and immigration law. Hon. Dorothy Harbeck is a member of the Executive Board of the FBA Immigration Law Section and a Fellow of the Foundation of the Federal Bar Association. She is the Eastern Regional vice-president of the NAIJ. She was appointed to the Elizabeth, N.J., Immigration Court in 2006 and is an adjunct professor in the trial skills department at Seton Hall University School of Law. She has published several articles on immigration law in various law journals and legal periodicals. A graduate of Wellesley College and Seton Hall University School of Law, she is a member of the NJ and NY bars and has been admitted to practice before the U.S. Supreme Court. The authors are writing in their capacities of Executive Board members of the NAIJ. The views expressed here do not necessarily represent the official position of the United States Department of Justice, the Attorney General, or the Executive Office for Immigration Review. The views represent the authors’ personal opinions, which were formed after extensive consultation with the membership of the NAIJ.

Endnotes

¹*The U.S. Immigration Court: A Ballooning Backlog That Requires Action*, HUMAN RIGHTS FIRST BRIEF 2 (Mar. 15, 2016), www.humanrightsfirst.org/sites/default/files/HRF-Court-Backlog-Brief.pdf (“Ballooning Backlog”).

²*Measures to Improve the Immigration Courts and the Board of Immigration Appeals*, DEP’T OF JUSTICE (2006), <https://www.justice.gov/sites/default/files/ag/legacy/2009/02/10/ag-080906.pdf> specifically point 16.

³*See Nearly Half of Immigration Judges Eligible to Retire, Courts Overwhelmed*, CBS DC (Dec. 22, 2013, 9:10 AM), available at [washington.cbslocal.com/2013/12/22/nearly-half-of-immigration-judges-eligible-to-retire-courts-overwhelmed](http://www.washington.cbslocal.com/2013/12/22/nearly-half-of-immigration-judges-eligible-to-retire-courts-overwhelmed) (last visited July 12, 2016). *See also* B. MILLER, L. CAMP KEITH & J. HOLMES, IMMIGRATION JUDGES & U.S. ASYLUM POLICY (2014). The work examines more than 500,000 asylum cases decided by U.S. immigration judges between 1990 and 2010 and offers policy recommendations for improving the quality of immigration law decision-making.

⁴S. Lustig, N. Karnik, K. Delucchi, L. Tennakoon, B. Kraul, D. Marks & D. Slavin, *Inside the Judges’ Chambers: Narrative Responses from the National Association of Immigration Judges Stress and Burnout Survey*, 23 GEO. IMMIGR. L.J. 57.

⁵J. Sullivan, “22 Factors That Influence Individual/Team Performance,” *Increasing Employee Productivity: The Strategic Role That HR Essentially Ignores*, ERE MEDIA (May 16, 2011), <https://www.performance.gov/initiative/manage-property/reduce-footprint>.

⁶In the last seven years, the number of cases pending before the courts has more than doubled, with the greatest spikes in the last two years. *See supra* n.1, at 1.

⁷www.performance.gov/initiative/manage-property/agency/DOJ (last visited 9/6/2016).

⁸Nina Bernstein, *Immigration Judges Facing Performance Reviews*, N.Y. TIMES (Aug. 9, 2016), http://www.nytimes.com/2006/08/10/washington/10immig.html?_r=0.

⁹*See supra* n.2, specifically point 1.

¹⁰*Judicial Performance Evaluation: How It Works*, U. DENV. INST. ADVANCEMENT AM. LEGAL SYS., <http://iaals.du.edu/quality-judges/judicial-performance-evaluation-how-it-works> (last visited 9/6/2016).

¹¹“[T]he Star Chamber ... that curious institution, which flourished in the late 16th and early 17th centuries, was of mixed executive and judicial character, and characteristically departed from common-law traditions. For those reasons, and because it specialized in trying political offenses, the Star Chamber has for centuries symbolized disregard of basic individual rights.” After centuries of terrorizing the common folk of England, the Star Chamber was finally abolished in 1641. *Faretta v. California*, 422 U.S. 806, 821 (1975). For a fuller description of the abolition of the Star Chamber, *see Abolition of the Star Chamber*, LONANG INST., <http://lonang.com/library/organic/1641-asc> (last visited 9/8/2016).

¹²*Immigration Judge Conduct & Professionalism*, DEP’T OF JUSTICE, <https://www.justice.gov/eoir/immigration-judge-conduct-and-professionalism>.

¹³Cynthia Gray, *Judicial Conduct Commissions: How Judicial Conduct Commissions Work*, JUSTICE SYS. J. 405, Vol. 28, No. 3 (2007) (“Judicial Conduct Commissions”) (2009).

¹⁴*Id.* (citation omitted).

¹⁵*American Immigr. Lawyers Ass’n v. Executive Off. for Immigr. Rev.*, 110 F. Supp. 3d 230 (D.D.C. 2015).

¹⁶*See supra* n.13 at 413.

¹⁷*Executive Summary: Reforming the Immigration System, Proposals to Promote Independence, Fairness, Efficiency and Professionalism in the Adjudication of Removal Cases*, A.B.A. COMM’N ON IMMIGR., at 28.

¹⁸*Assembly Line Injustice, Blueprint to Reform America’s Immigration Courts*, APPLESEED 7-8 (May 2009).

¹⁹*Id.*

²⁰*Matter of M-E-V-G-*, 26 I&N DEC. 227 (BIA 2014); *see also Matter of W-G-R-*, 26 I&N DEC. 208 (BIA 2014).

²¹*W-G-R-*, *supra* n.20, at 221.

²²*In Matter of A-R-C-G-*, 26 I&N DEC. 388 (BIA 2014).

²³*M-E-V-G-*, *supra* n.20, at 238.

²⁴*W-G-R-*, *supra* n.20, at 214-15.

²⁵*Id.*

²⁶*Matter of M-A-M*, 25 I&N DEC. 474 (BIA 2011).

²⁷*Id.* at 483.

²⁸*Diop v. Attorney Gen.*, 633 F.3d 201 (3d Cir. 2011).

²⁹*Id.* at 235; *see also Leslie v. Tat’s Gen.*, 678 F.3d 265 (3d Cir. 2012).

³⁰*Id.* at 234.

³¹*Chavez-Alvarez v. Warden York Cnty. Prison*, 783 F.3d 469, 474 (3d Cir. 2015).

³²*Reid v. Donelan*, No. 14-1270, 2016 WL 1458915, at *1 (1st Cir. Apr. 13, 2016) and *Ly v. Hansen*, 351 F.3d 263 (6th Cir. 2003).

³³*Lora v. Shanahan*, 804 F.3d 601 (2d Cir. 2015).

³⁴*Rodriguez v. Robbins*, 804 F.3d 1060 (9th Cir. 2015). The U.S. Supreme Court is currently deciding the government’s petition for certiorari in this matter, *sub nom. David Jennings et al. v. Alejandro Rodriguez et al.*, Mar. 28, 2016 (No. 15-1204).

³⁵*Rodriguez*, 884 F.3d at 1089.

³⁶Tara Lundstrom, *Lasting Lessons From the Border Surge: It’s Time We Fund an Independent Immigration Court System*, FED. LAWYER 3-4 (Jan./Feb. 2015).

³⁷*About the Office*, EXEC. OFFICE FOR IMMIGR. REV., DEP’T OF JUSTICE, <https://www.justice.gov/eoir/about-office> (last visited 9/8/2016).

³⁸*See supra* n.35, at 3-4.

³⁹*Id.*

⁴⁰Dana Leigh Marks, *An Urgent Priority, Why Congress Should Establish an Article I Immigration Court*, 13 BENDERS IMMIGR. BULL. 3, 20 (Jan. 1, 2008).

⁴¹*Id.* at 21.

⁴²*See Article I & Independence Endorsements*, NAT’L ASS’N IMMIGR. JUDGES, <http://naij-usa.org/publications/article-i-and-independence-endorsements> (last visited 9/8/2016).