

“Citizens but for Papers:” Undocumented Youth Organizations, Anti-Deportation Campaigns, and the Reframing of Citizenship

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ABSTRACT

Scholars have documented strong anti-immigrant bias in mainstream media portrayals and public sentiment, especially associated with notions of “illegality.” Yet certain groups of undocumented immigrants have been able to defend their continued residency. How are undocumented immigrants, as marginalized subjects, able to make claims for legal and social recognition? Through an analysis of 125 anti-deportation campaigns led by undocumented youth organizations in the United States, I show how organizations developed a nationally coordinated model using *citizenship frames* to challenge deportations and build support for pro-immigrant legislation. Citizenship frames are based in legal and normative ideologies of citizenship that underscore acculturation, civic engagement, and humanitarian concerns. The campaigns highlight undocumented immigrants’ social integration, deservingness, and practice of citizenship, therefore contesting the boundaries between citizen and noncitizen, and between lawful and unlawful. Though citizenship frames are used across cases, campaign tactics vary: students are portrayed as high-achievers who would suffer greatly if deported, while campaigns for non-students emphasize the detrimental effects of deportation on others. Importantly, citizenship frames are bounded by the government’s priorities for immigration enforcement, with potentially negative consequences for those immigrants considered less than model citizens.

KEYWORDS: deportation, undocumented immigrants, undocumented youth organizations, citizenship, collective action frames.

The United States is home to nearly 12 million undocumented immigrants, who compose approximately a third of the foreign-born population (Passel and Cohn 2011). Increasingly restrictive immigration laws have spurred the growth of this large and settled noncitizen population, in turn

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triggering ever-more restrictive policy responses (Massey, Durand and Malone 2002, Ngai 2004). Over the past three decades, immigration laws have become increasingly punitive; for example, by jettisoning opportunities for legalization for the undocumented and eliminating many existing avenues to challenge deportation (Coutin 2011). As a result, deportations have skyrocketed: The U.S. government deported over four million noncitizens between 1997 and 2012, amounting to more deportations in the first decade of the 2000s than in the preceding 110 years combined (Golash-Boza and Hondagneu-Sotelo 2013, Immigration Policy Center 2013).

Social scientists have analyzed the role of population and policy dynamics in shaping negative public perceptions of immigrants (Ebert and Okamoto 2015). The mainstream media largely portrays undocumented immigrants as social, economic, and political threats (Chavez 2008, Santa Ana 2013). However, certain groups of immigrants—in particular, undocumented students—have been able to make claims for their legal and social recognition (Nicholls 2013, Patler and Gonzales 2015). Indeed, undocumented students have come to be widely recognized as an organized group with a legitimate and identifiable voice (Nicholls 2013)—both via their advocacy for pro-immigrant legislation like the DREAM Act¹, as well as their efforts to stop detention and deportation.

As part of their activist work, between 2009 and 2012, national undocumented youth organizations mounted scores of public anti-deportation campaigns for undocumented immigrants across the country. These campaigns included the widespread use of online petitions that regularly garnered thousands of letters, faxes, and phone calls against individual deportations. Aligned with activism for the DREAM Act, the campaigns began by focusing on high-achieving students. However, they later expanded to include low-wage workers, parents of U.S. citizen children, and even detained immigrants with criminal records. In many cases, the organizations successfully won immigrants' release from detention or reprieve from deportation. As a coordinated national effort, the cases helped build support for a series of administrative actions that deprioritized the deportations of millions of undocumented youth.

This paper seeks to explain how undocumented immigrants, as marginalized subjects, are able to challenge immigration policy enforcement, especially in the current era of increased criminalization of immigrant communities. Through a national analysis of 125 public anti-deportation campaigns led by undocumented student organizations, I demonstrate how and when certain frames are used to contest the boundaries of belonging inherent in deportation policy enforcement. I pay particular attention to how these frames change across political contexts, stages of the policy cycle, and across different groups of undocumented immigrants. Finally, I consider the extent to which these claims reflect and are reflected by existing laws and policies.

The campaigns use what I call *citizenship frames* to mobilize the flexibility of normative and legal definitions of citizenship to challenge deportation. Citizenship frames highlight the social and cultural integration associated with the *practice* of citizenship and individuals' affiliation with U.S. national identity and values. Citizenship frames also tap into humanitarian concerns associated with normative and legal notions of belonging such as innocence and deservingness. As such, citizenship frames strategically blur the boundaries between citizen and noncitizen, and between lawful and unlawful. My results show that although campaign tactics can vary, all campaigns use some combination of these frames. However, undocumented youth organizations employ slightly different citizenship frames depending on the political moment (leading up to, or in the wake of, policy changes) and the subject of the campaign (students vs. non-students).

A central component of citizenship frames is that they both reflect and influence laws and policies. In other words, while citizenship frames can challenge deportation policy, they also reflect notions of

1 The Development, Relief, and Education for Alien Minors (DREAM) Act is a legislative proposal first introduced in 2001. Most versions of the bill provide conditional permanent residency to eligible undocumented young adults who came to the United States as children, graduated from high schools, and are of "good moral character." The bill would provide an eventual path to citizenship for undocumented youth who complete time in accredited institutions of higher learning or in the military. The most recent version of the bill failed in Congress in December 2010.

membership and belonging already embedded in immigration laws, court cases, and in the government's discretionary priorities for deportation that distinguish between noncitizens by background characteristics. Given the intricate relationship between citizenship frames and the policy process, I conclude that the selective attribution of deservingness to certain groups may ultimately reinforce the alienation of other immigrants considered "less desirable" by policymakers and mainstream audiences (Yukich 2013).

This study contributes to several theoretical and empirical debates. First, though previous studies have explored claims-making strategies among or on behalf of noncitizens in the United States, these analyses tend to focus on *who* is mobilized (generally, citizens on behalf of noncitizens), and *why* the mobilization can occur (the effectiveness of advocacy at varying stages of the policy process). Few studies have analyzed the claims themselves. Second, research that zeroes in on the content of claims does so by focusing in large part on the construction of "goodness" via moral frames, but with less attention to the ways that normative and legal notions of citizenship reflect and are reflected in such claims. Third, while existing studies have examined anti-deportation cases studies in Europe or efforts to advance pro-immigrant policies like the DREAM Act in the United States, the present study is the first analysis of efforts by national U.S. immigrants' rights organizations to mobilize citizenship frames during the implementation phase of the policy process—i.e., during deportation proceedings. Methodologically, this unique dataset allows for an analysis of claims-making strategies spanning pro- and anti-immigrant policy contexts, as well as different immigrant groups, over a four-year period. Thus, I am able to test existing theories of immigrant claims-making based on small case studies. By demonstrating a nationally coordinated model, I show that anti-deportation cases are not fought on an ad-hoc, case-by-case basis, but are rather the result of a coordinated social movement.

Finally, this research provides a parallel story to recent literature on anti-immigrant public sentiment and actions (Ebert and Okamoto 2015, Stewart et al. 2015) by demonstrating how and when immigrant rights organizations have been able to reframe the debate for certain immigrant groups. Yet, it also highlights the limitations of pro-immigrant mobilization in the current era of burgeoning immigration law enforcement. For example, the use of citizenship frames may ultimately perpetuate and justify legal and social distinctions between different groups of immigrants. More broadly then, this paper sheds light on the strategies and constraints that marginalized groups may use to make claims in politically and legally restrictive contexts. As such, it contributes to ongoing theoretical debates about the interplay of rights activism and policy, and the continued relevance of state control.

THEORETICAL AND LEGAL FRAMEWORK

The Undocumented Student Movement and the Use of Citizenship Frames

The Immigration and Nationality Act generally provides eligibility for citizenship and legal residence through family ties, employment, and humanitarian concerns. However, the formal, codified definition of citizenship can vary from the practical allocation of rights, the practice of citizenship in the form of civic engagement, as well as feelings of belonging and social membership (Bosniak 2006, Coutin 2000). Undocumented youth are a pronounced example of this paradox. Though they are legally excludable from the nation, they grow up in the United States, attend U.S. schools, and are eligible for certain rights surrounding educational access. For example, in the landmark 1982 case of *Plyler v. Doe*, the Supreme Court held that school districts could not deny enrollment to undocumented immigrants based on their legal status. By acknowledging undocumented children as "persons" under the 14th Amendment who cannot be barred from education, *Plyler* gave undocumented youth a type of legal standing as students (Motomura 2014, Nakano Glenn 2011). However, outside of the school setting and as they enter adulthood and "age into exclusion" (Gonzales 2011), undocumented students are barred from full political or labor market participation and therefore come to occupy what Evelyn Nakano-Glenn refers to as a distinct status of "liminally legal" subjects (Menjívar

2006, Nakano Glenn 2011).² This in-between status sheds light on the social and legal processes through which citizenship and membership boundaries are formed and reshaped. While other groups of immigrants also occupy liminal legal statuses, undocumented youth are unique due to their extensive incorporation into U.S. educational institutions (Abrego 2011, Gleeson and Gonzales 2012). As such, the claims-making frames available to them are also distinct.

For more than a decade, undocumented youth organizations have waged campaigns for the DREAM Act and other pro-immigrant legislation that would benefit undocumented young people and students (Gonzales 2008, Nicholls 2013, Rincón 2008, Seif 2004). In their advocacy work, these organizations emphasize undocumented youths' social and cultural membership despite their lack of formal legal standing. Walter Nicholls argues that undocumented youth who advocate for the DREAM Act ("Dreamers") became a "politically identifiable group" precisely because of their in-between status (2013:9-10). He describes the Dreamer movement's messaging, which stresses strong national identification and conformity to national values. Building on Nicholls, I show how the purposeful mobilization of national affiliation and values is an important component of the citizenship framing used in anti-deportation campaigns.

My use of *citizenship frames* builds on Robert Benford and David Snow's concept of *collective action frames*, which are "action-oriented sets of beliefs and meanings that inspire and legitimate the activities and campaigns of a social movement organization" (2000:614). Extending this concept, I contend that undocumented youth organizations, in their efforts to defend undocumented immigrants from deportation, employ collective action frames based in normative and legal definitions of citizenship and belonging. Citizenship frames involve careful and curated presentations of the undocumented experience to position undocumented immigrants as integral parts of the social fabric—as citizens but for papers. Citizenship frames build on the discretion inherent in immigration laws and policies by tapping into the conceptions of membership, rights, and belonging associated with the practice of citizenship.

Citizenship frames contain elements of both diagnostic and prognostic framing (Benford and Snow 2000, Cress and Snow 2000). Undocumented youth organizations expose or "diagnose" the problem—that individuals who are "citizens but for papers" are being subjected to formal expulsion—in order to garner public attention. The "prognosis" is then twofold. First, the organizations seek to stop the deportation by bringing it to the attention of decision-makers. They also use the potential deportation to build support for broader policy changes that would expand access to formal legal status. For example, supporters can sign online petitions and call legislators, both to oppose individual deportations and to build support for pro-immigrant legislation such as the DREAM Act or comprehensive immigration reform. The campaigns allow supporters to identify the problem and work toward solving it simultaneously.

Citizenship frames may be understood as a response to the negative public portrayals of undocumented immigrants. Previous literature has documented other counter-rhetorical strategies of pro-immigrant organizations (Fujiwara 2005, Yukich 2013). For example, in an analysis of the New Sanctuary Movement, Grace Yukich (2013) described how activists used a "model immigrant" frame to portray certain immigrants as model residents who represent Christian ideals of family and emphasize a strong work ethic. Such studies provide an important starting point for understanding the moral framework behind the claims-making strategies of pro-immigrant activists. I build on these studies by analyzing how such framing reflects and interacts with existing laws and policies.

2 While Cecilia Menjívar's (2006) original conceptualization of liminal legality included noncitizens caught in the vast gray area between documented and undocumented, Evelyn Nakano-Glenn (2011) extends this concept to the situation of undocumented students. She argues that undocumented students' legal right to K-12 education "gives undocumented individuals legal standing . . . on the same terms as legal immigrants and citizens," but that their status remains liminal because it does not extend to all areas of off-campus life (2011; 12).

Operationalizing Citizenship Frames

Citizenship frames emphasize acculturation, civic engagement, and humanitarian concerns to highlight undocumented immigrants' practice of citizenship, despite lacking formal legal status. Acculturation narratives underscore integration outcomes such as educational accomplishments often highlighted in immigrant incorporation research (Alba and Nee 2003, Kasinitz, Mollenkopf and Waters 2008, Portes and Rumbaut 2001). Citizenship frames also emphasize subjective indicators of acculturation such as the feelings of membership present in an explicit identification with "American" culture and values (Brubaker 1989, Coutin 2003, Gonzales 2011, Nicholls 2013). Citizenship frames also emphasize civic engagement and community ties, a strategy documented in other research on legal advocacy for immigrant groups (Anderson, Gibney and Paoletti 2011, Coutin 2003, Morando Lakhani 2013). For instance, in a study of immigration lawyers, Sarah Morando Lakhani (2013:446) argues that practitioners use civic engagement narratives to "position their clients as contributing members of society who are deserving of legal status." Similarly, Susan Coutin (2003) finds that migrants' work histories are most effective in adjustment of status cases when they align with an American cultural emphasis on hard work and meritocracy. In the European context, Bridget Anderson and associates (2011) argue that anti-deportation campaigns for asylum seekers in the United Kingdom express normative notions of belonging by highlighting migrants' contributions to the community.

Finally, citizenship frames emphasize deservingness to stay in the U.S. through humanitarian concerns. Though humanitarian concerns may not generally be associated with the practice of citizenship, as with frames of acculturation and civic engagement, they reflect normative notions of deservingness built into immigration policies and prosecutorial discretion guidelines. Children's innocence is a central feature of humanitarian citizenship frames and has been documented in previous research. For example, Jane Freedman (2011) documents the strong emphasis on children's rights in advocacy for children of *Sans Papier* in France. In the United States, undocumented youth are positioned as innocent children who were brought to the United States through no fault of their own (Patler and Gonzales 2015).

The Relationship of Citizenship Frames to Immigration Laws and Policies

Citizenship frames are not generated exclusively by advocates. Instead, they mirror and are mirrored by the normative notions of citizenship and belonging already present in three policy arenas: U.S. immigration laws, Supreme Court cases, and priorities for prosecutorial discretion. The Immigration and Nationality Act emphasizes the conferral of benefits based on ties to the host country—for instance, by allowing naturalization for most legal residents after five years. The Supreme Court has also emphasized normative notions of belonging: In *Plyer v. Doe*, for example, the Court concluded that "what matters is not lawful or 'illegal' presence as a formal matter, but rather the ties that unauthorized migrants forge in this country and the contributions they make—with the government's acquiescence" (Motomura 2014:10). Finally, procedural guidelines for immigration enforcement underscore the salience of normative notions of acculturation, belonging, and humanitarian concerns. For instance, Immigration and Customs Enforcement (ICE) has developed a prioritization system for deportation, specifying a low priority for those who came to the United States as children, as well as the elderly, the sick, and other groups (see, for example, the enforcement priority memorandums of former officials including Meissner 2000, Morton 2011, and Napolitano 2012).

While citizenship frames reflect existing laws and policies, they also influence how these policies develop. Over the course of this research, ICE altered its prosecutorial discretion guidelines in ways that corresponded to increased activism by undocumented youth. In June 2011, ICE Director John Morton issued updated deportation priority guidelines (hereafter "the Morton Memo;" see Appendix A) stating that immigrants who had completed high school or college education in the U.S. should be considered a "low priority" for deportation. Then, in June 2012, the Obama administration

announced the Deferred Action for Childhood Arrivals (DACA) program to allow eligible undocumented youth to apply for deferred action from deportation³ and renewable two-year work authorization. DACA's introduction is largely credited to activism by undocumented youth organizations, including the anti-deportation campaigns I analyze herein. The program's eligibility criteria suggest that individuals who are educated, acculturated, long-time residents, and blameless for their legal status should have the right to stay in the United States, pursue education, and work legally.⁴ Though similar types of temporary protected statuses have been issued over the years, DACA is the first to target undocumented youth.

The Politics of Anti-Deportation Claims-Making in an Era of Crimmigration

Social scientists have studied the role of population and policy dynamics in shaping negative public portrayals of immigrants. Scholars have documented the mainstream media's depiction of certain immigrants as social, economic, and political threats (Chavez 2008, Santa Ana 2013). These portrayals are laden with anti-immigrant sentiment that can prejudice entire racial and ethnic groups (Chavez 2008). Recent scholarship on group threat shows that punitive public sentiment increases with the growth of minority or immigrant populations, often resulting in support for more punitive measures (Stewart et al. 2015, Welch et al. 2011). Indeed, the past three decades have brought about such an unprecedented overlap between criminal and immigration law that many scholars refer to the phenomenon as "crimmigration" (Stumpf 2006).

Given the steady increase in immigration law enforcement and negative public representations of undocumented immigrants, how are citizenship frames effective, especially at the enforcement stage of the policy process—the deportation stage—in which law is already codified? As I have argued above, boundaries of belonging may be more fluid than the parameters of formal citizenship. Immigrants across legal statuses enter schools and labor markets, form families, and put down roots. As a result, when individual immigrants face potential deportation, the harm is felt across entire communities (Golash-Boza and Hondagneu-Sotelo 2013, Hagan, Rodriguez and Castro 2011). Because the cost of deportation is shared, deportation programs produce counter-protests among supporters who mobilize on behalf of certain individuals in deportation proceedings, often with great success (Anderson, Gibney and Paoletti 2011, Ellermann 2009). Though many immigrants suffer the deportation process in isolation from the public (Bosworth 2011), high-profile mobilization for particular immigrants can garner attention and sway public opinion to favor the rights of potential deportees (Anderson, Gibney and Paoletti 2011, Ellermann 2009, Patler and Gonzales 2015). By using citizenship frames, immigrant organizations can deploy the notion of the "supercitizen immigrant" (Honig 2001) whose narrative aligns with tropes of American nationalism, therefore simultaneously protecting the individual immigrant and reinforcing symbolic boundaries of national membership.

DATA & METHODOLOGY

This article draws from a content analysis of 125 anti-deportation campaigns led by two national undocumented youth organizations, United We Dream (UWD) and Dream Activist (DA), and their local organizational members. UWD and DA are membership organizations with dozens of local affiliates across the country. The organizations evolved in response to efforts to coordinate activities between campus- and community-based groups and to amplify their effectiveness at the national level. To my knowledge, during the period of data collection, UWD and DA were the two largest organizations representing undocumented youth on a national scale. Much of their work was volunteer-driven, and organizational leaders were predominately current or former undocumented students. I

3 Deferred action is a form of prosecutorial discretion in which the government decides, on a discretionary and temporary basis, not to pursue the deportation of an individual.

4 Though it offers temporary protection from deportation and access to work authorization, DACA does not confer citizenship. Scholars therefore argue that it creates a "new form of liminal legality" (Menjívar and Coutin 2014: 329; Cebulko 2014).

gathered data on 125 public anti-deportation campaigns for undocumented individuals from online action alerts released via email or publicized on the websites of UWD and DA. These campaigns took place between February 2009 and December 2012, a critical period for undocumented youth activism. February 2009 marked the first highly publicized anti-deportation campaign, followed by the failure of the DREAM Act in December 2010, the release of the Morton Memo in June 2011, and the announcement of the DACA program in June 2012.

My analytical strategy proceeded in several steps: First, I created a campaign database of information about case subjects (sex, country of origin, student status, educational level, and whether the individual was part of his/her own case or a group case for more than one individual). I also tracked whether the subject was living in a U.S. state with laws or policies allowing or barring undocumented students to pay in-state tuition rates at public colleges and universities. These policies are highly contested and often mirror the type of local political climate that could allow anti-deportation campaigns to garner more or less support from the public, the media, and from political elites.⁵ Next, I created a coding scheme to analyze action alerts for mention of any of the characteristics outlined in the Morton Memo—for example, the length of presence in the United States, the circumstances of arrival (e.g. childhood arrivals), the pursuit of education in the United States, and each of the other factors outlined in the Memo.

Finally, to assess campaign outcomes, I applied codes for campaign tactics (specific calls to action, DHS and Congressional targets, mention of pro-immigrant policies) and results (how many petitions were signed and whether the case generated media attention). Unfortunately, the organizations kept few formal records of petition outcomes in the early years of the campaigns, making data available for only about half of the cases. To track media hits, I used LexisNexis, ProQuest Newspapers, and Access World News to document whether each campaign had been picked up in English language news from print, radio, web and newswire sources, excluding blogs and press releases. I have described the media's coverage of these cases elsewhere (Patler and Gonzales 2015); here, I include only a simple binary measure of whether or not the case received a media hit. Finally, based on patterns in the coded data, I grouped the action alerts into citizenship frames emphasizing acculturation, civic engagement, and humanitarian concerns. To ensure consistency and reliability, each action alert was coded by the author as well as by a research assistant. Data were then analyzed using Stata.

Social movements literature has long shown that advocacy organizations are likely to select the most sympathetic or model cases to promote their goals (see, e.g., Keck and Sikkink 1998, Yuchik 2013). As I discuss below, the deportation campaigns in my sample were selectively chosen by the organizations and therefore do not represent all attempts to stop deportations. My goal in analyzing these cases was precisely to explore the *public* content of frames used in anti-deportation campaigns, and how such frames reflect and are reflected by existing laws and policies. The cases represent the type of messaging that undocumented youth organizations use to counter and shape the debate about immigrants in the United States.

My primary data source is action alerts; however, my analysis is informed by secondary data, participant observation and unstructured interviews with leaders in DA, UWD, and their affiliates. This included conversations and correspondence with anti-deportation campaign coordinators at DA and UWD, as well as field coordinators leading anti-deportation campaigns in California in 2010 and 2011. These individuals shared an extensive set of documents regarding case selection and mobilization. I also attended two training workshops for local affiliates on how to conduct campaigns. Finally,

5 As of the endpoint of this research in 2012, the following states had laws or policies allowing eligible undocumented students to pay in-state fees/tuition at public colleges and universities: California (as of 2001), Connecticut (2011), Illinois (2003-2004), Kansas (2003-2004), Maryland (2011-2012), Nebraska (2006), New Mexico (2005), New York (2002), Oklahoma (2003-2004), Rhode Island (2011, via Board of Governors), Texas (2001), Utah (2002), and Washington (2003-2004). States that had barred access to in-state tuition or enrollment via laws or policies by the Boards of Governors include: Alabama (2011), Arizona (2006), Colorado (2008), Georgia (2008, 2010), Indiana (2011), and South Carolina (2008).

I volunteered on several campaigns during 2013, allowing me unique exposure to the tactics and strategies of organizational affiliates.

FINDINGS

I present the results of my analysis as follows. First, I explain the process of case selection and preparation. I then describe the characteristics of the campaigns and campaign subjects. Next, I demonstrate the prevalence of citizenship frames. I then present an analysis of campaign tactics and outcomes, including observations about the ways the cases changed over time. Finally, I compare student and non-student campaigns to illustrate how citizenship frames are used in strategically different ways, depending on the campaign subject.

Case Selection and Preparation

Anti-deportation cases are carefully selected to “go public” in two ways. First, organizational leaders or affiliates can handpick a subject who is in deportation proceedings and meets certain criteria. Alternatively, individuals facing deportation (or their supporters) contact the organizations directly to request help. For example, UWD’s website has a “Get Help” tab for individuals in deportation proceedings.⁶ The link leads to a questionnaire about the subject’s educational level, level of community involvement, etc.

An anti-deportation campaign has several components, the first of which is deciding whether to wage the campaign publicly. A “how-to” guide for anti-deportation campaigns, created by DA and its affiliates, describes this choice: “By going public you are willing to share your name as well as pictures of yourself. You are willing to create short 2-3 minute video clips with your story or an update on your situation” (*Asian Law Caucus et al. 2011*; 32). If an individual’s story does not align with the citizenship frames utilized by the organizations, the case might not be fought publicly. For example, one activist described a 2010 case of an undocumented student who had been arrested for drunk driving. Organizational leaders wanted to help the young man, but they debated whether to stage a public campaign given his arrest.

If a case is selected to go public, a team is formed within a few days to handle components of the case including social media campaigns, media outreach and public events, and interfacing with high-level stakeholders such as politicians and ICE Field Officers. The organizations also attempt to secure legal support from a *pro bono* attorney to prepare legal documents, including letters to DHS and ICE. Next, the organizations identify Congressional and ICE targets, create online petitions and social media pages, and seek support from organizations and individuals familiar with the subject’s case. For instance, campaign organizers may ask a teacher to draft statements in support of a current or former student in deportation proceedings. Online petitions are critical to campaigns: A regional coordinator explained that as of 2013, the national organizations required local affiliates to commit to collecting a minimum of 1,500 signatures per campaign. Online activism is a particularly viable strategy that allows volunteer-led organizations like UWD and DA to reach a large number of people with relatively few resources and without being in the same physical location (*Earl and Kimport 2011*). This is especially important for undocumented youth activists whose legal status and access to travel documents may be a barrier to other types of collective action (*Valdivia Ordorica 2015*).

Taking Action

Table One provides descriptive information on individual and campaign characteristics. Given that males are more likely to face police scrutiny that can lead to arrest and deportation proceedings (*Golash-Boza and Hondagneu-Sotelo 2013*), it is perhaps unsurprising that men made up over three-quarters of case subjects. Campaign subjects hailed from 26 countries across five continents. This ethnic and country-of-origin diversity is used strategically: In their online guide, DA and its affiliates

6 <http://unitedwedream.org/> (accessed February 28, 2015).

Table 1. Anti-Deportation Campaigns Led by National Undocumented Youth Organizations, 2009-2012 (n = 125)

Individual Characteristics	
Male	78%
<i>Most Frequent Countries of Origin^a</i>	
Mexico	30%
Guatemala	7%
Colombia	6%
Not Stated	14%
Former/Current Student	63%
<i>Type of School Attended/Attending</i>	
High School/GED	33%
Community College	25%
University	35%
Multiple	7%
Campaign Characteristics	
<i>Cases per Year</i>	
2009	6%
2010	16%
2011	35%
2012	42%
<i>Organization Running Campaign</i>	
Dream Activist	64%
United We Dream	21%
Other	15%
Group Campaign	26%
<i>Most Frequent U.S. State of Campaign^b</i>	
Florida	26%
California	14%
Texas	7%
<i>Political Climate</i>	
State has In-State Tuition Law/Policy	36%
State has Policy Banning In-State Tuition	11%
Campaign Tactics	
Sign Petition	92%
Make Calls / Faxes	70%
Email a Friend / Post to Social Media	28%
<i>Campaign Target</i>	
DHS (Napolitano, Morton, ICE Regional Director/Field Officer)	74%
Politician / Member of Congress	30%
<i>Policy Mention</i>	
DREAM Act	51%
Morton Memo or Enforcement Priorities (after June 2011)	78%
Comprehensive Immigration Reform	20%

Notes: ^aIndividuals were born in 26 different countries on 5 continents.

^bIndividuals came from 24 different U.S. states (including Washington, D.C.)

emphasize the importance of “breaking stereotypes” by highlighting diversity in an individual’s background. For example, they describe the anti-deportation case of a Chinese Peruvian student: “the unexpected/unusual situation [background] of a young man of Chinese heritage facing deportation to his native Peru helped drum up initial press interest” (*Asian Law Caucus et al.* 2011; 61).

The number of campaigns increased each year. DA and UWD organized 85 percent of the cases. Twenty-six percent of cases were group campaigns, most frequently for a family (for example, a parent and child, siblings, or some other family unit) or a group of detained immigrants. Sixty-three percent of the total cases focused on current and former immigrant students. Of student cases, 30 percent were for high school students and 60 percent were for college or university students. The subjects of the campaigns also shifted over time. Altogether, 44 percent of DA’s 78 cases were for non-students. After the DREAM Act failed in December 2010, DA broadened the scope of its campaigns to include non-students so that after DACA’s announcement in June 2012 (which freed many recipients from deportation worry), nearly all DA’s campaigns were for non-students. Alternatively, UWD retained its focus on students: only four of UWD’s total cases (15 percent) were for non-students, most of which occurred in 2012.⁷

Campaigns took place in 24 U.S. states, with Florida, California, and Texas accounting for about half of the cases.⁸ These states are home to large and settled undocumented immigrant populations, as well as a dense grouping of immigrant rights organizations, and have been historic sites of political contestation about immigrants’ rights. California and Texas have enacted restrictive anti-immigrant legislation as well as more expansive legislation providing in-state tuition for undocumented students. Overall, 35 percent of campaigns took place in the 11 states with state laws or policies granting in-state tuition to undocumented students as of 2012, while 11 percent of cases took place in the six states with laws explicitly barring in-state tuition.

Anti-deportation campaigns aim to link the negative impacts of immigration policy enforcement (the potential deportation) with a prognosis for policy change. Table One shows that the vast majority of action alerts (92 percent) include specific calls to action in the form of online petitions, calls or faxes to a campaign target (70 percent), and/or requests to share the case information using email or social media (28 percent). Many calls to action mention a DHS or Congressional target by name (74 and 30 percent, respectively). For example, Hadi Z.’s⁹ supporters were encouraged to make direct calls to the offices of ICE Director John Morton and DHS Secretary Janet Napolitano. The alert provides phone numbers and a sample script:

“I am calling to ask that the deportation of DREAMer Hadi [last name] be stopped. Hadi has been living in the U.S. since he was 4 years old and is currently working towards obtaining a degree in Industrial Design. Hadi is DREAM Act eligible and should be allowed to stay in the country with his family. Don’t deport Hadi.”¹⁰

7 Though both DA and UWD continued to engage in anti-deportation campaigns following the failure of the DREAM Act, the organizations’ tactics shifted. For example, in addition to focusing on anti-deportation campaigns for non-students, DA leaders increasingly organized more confrontational acts of civil disobedience such as sit-ins in congressional offices and the infiltration of immigration detention facilities. UWD and DA described these different approaches as “the same vision, but different strategies.” (see Altschuler, Daniel. May 16, 2011. “The Dreamer Movement Comes of Age.” *Dissent*. Available at: https://www.dissentmagazine.org/online_articles/the-dreamers-movement-comes-of-age (accessed November 17, 2015)).

8 Florida is overrepresented in the sample due to a series of campaigns by DA for detainees held at the Broward Detention Center. These campaigns began in July 2012, immediately following the passage of DACA. When I run my analysis excluding group campaigns, the results do not change substantially.

9 Though all anti-deportation campaigns were waged publicly and the media covered many cases, I choose to abbreviate last names to protect anonymity.

10 Campaign for Hadi Z. (Pakistan), student, California, December 2012.

The quote invokes Hadi's acculturation and long-time residence as characteristics that should allow him to "stay in the country." The alert also mentions the DREAM Act. Campaigns regularly included information about efforts to change immigration policy and aligned with the policy cycle. Overall, 51 percent of cases mentioned the DREAM Act and 30 percent mentioned comprehensive immigration reform.

Though the number of campaigns increased each year, cases were not evenly distributed, instead clustering around key periods in the policy-making cycle—for example, in the lead-up to a Congressional vote on the DREAM Act. Thirteen of the 20 cases from 2010 were waged in the months leading up to Congress' December vote on the DREAM Act. Likewise, 30 of the 44 cases in 2011 took place immediately following the June release of the Morton Memo and nearly 80 percent of subsequent cases refer directly to the memo. For example, Maria G.'s July 2012 action alert states: "According to the memo issued by John Morton, Maria is a low-priority case and should be granted favorable exercise of prosecutorial discretion."¹¹

Citizenship Frames: Acculturation, Civic Engagement, and Humanitarian Concerns

Action alerts used citizenship frames emphasizing several key indicators of citizenship as acculturation and civic engagement: educational status and accomplishments, feelings of belonging or "Americanness," and ties or contributions to the community, including via work history. As Table Two shows, 63 percent of action alerts describe the subject's educational status, often mentioning a specific educational accomplishment—for example, earning high grades, passing Advanced Placement tests, or receiving a scholarship. An action alert for 19-year-old Herta L., an Albanian national, includes the following:

Herta has lived in Detroit since she was 11. . . Herta excelled in everything during high school, graduating with a 4.05 GPA.¹²

This alert emphasizes Herta's long-time residence, high GPA, and academic excellence. Importantly, each of these characteristics (age at arrival, length of presence in the U.S., and educational pursuits) appear in ICE's guidelines for prosecutorial discretion as of 2011, demonstrating the link between citizenship frames and existing laws and policies. Action alerts also underscore subjective feelings of membership, belonging, and feelings of "Americanness." A campaign for community college student Jennifer A. described her as an "all-American girl."¹³ Nearly a quarter of action alerts used terminology like "all American" or "true American" to describe subjects and make a case for his or her continued residence.

Citizenship frames also emphasize community involvement and hard work. As Table Two demonstrates, 38 percent of action alerts described subjects' community ties. University student Mario P.'s campaign boasted that he had contributed over "1,400 volunteer hours to his community."¹⁴ Herta L.'s action alert states: "[Herta] has been very active in our community, volunteering at homeless shelters, summer day camps, and tutoring programs, in addition to a lot of other things with her church."¹⁵ In addition, about a third of the cases explicitly described the subject as a good or hard worker, reflecting an emphasis on meritocracy that is common in the United States (Coutin 2003). For example, student Elier L. is described as having an "undying work ethic."¹⁶

Citizenship frames also use humanitarian concerns to portray certain immigrants as innocent victims in order to promote their right to remain in the country. Nearly three-quarters of alerts

11 Campaign for Maria G. (Venezuela), non-student, Florida, July 2012.

12 Campaign for Herta L. (Albania), student, Michigan, August 2010.

13 Campaign for Jennifer A. (Brazil), student, Kentucky, November 2010.

14 Campaign for Mario P. (Mexico), student, Texas, February 2011.

15 Campaign for Herta L. (Albania), student, Michigan, August 2010.

16 Campaign for Elier L. (country of origin not listed), student, Ohio, May 2011.

Table 2. Citizenship Frames and Campaign Outcomes, by Student Status

	<i>All Cases</i>	<i>Students</i>	<i>Non-students</i>
Acculturation & Civic Engagement			
Educational accomplishments	41%	62%	4%
“Feel American” / “All-American” / “like everyone else”	19%	27%	7%
Volunteering or community involvement	38%	45%	28%
“Good worker” Or “works hard”	33%	26%	46%
Humanitarian Concerns			
<i>Individual & Family Characteristics (matching Morton Memo)</i>			
Childhood arrival / extended time in U.S. / “brought” to U.S.	74%	96%	37%
Would suffer in / “doesn’t know” country of origin	50%	55%	41%
Family in U.S. would suffer if deported	50%	46%	59%
Innocence/Deservingness Indices (Mean Scores)			
Individual innocence/suffering index (range 0-5)	1.9	2.3	1.6
Family innocence/suffering index (range 0-4)	1.0	0.7	1.5
Campaign Outcome			
Released from detention/granted prosecutorial discretion ^a	77%	95%	50%
Median petition signatures (Range: 158-38,983) ^b	1,834	2,080	1,002
Case Received Media Hit	43%	54%	24%

Notes: n = 125, except for the following: ^a Release data available for 35 cases. ^b Petition data available for 56 cases.

mentioned that the subject had arrived in the United States as a child, spent a significant part of their childhood or youth in the United States, or was “brought” to the United States by family or friends. Balal P.’s action alert states:

Balal embodies the idea of a model American. He was *brought* to the U.S. from Pakistan *when he was five*. He was a good student, played on his high school football team, went to community college, and married his high school sweetheart. Balal has no criminal record whatsoever (emphasis added).¹⁷

Balal’s petition emphasizes that he was “brought” to the United States at a very young age, suggesting that he did not make his own decision to migrate, and therefore should not be blamed for his legal status. This notion reflects the sentiment prevalent in the Morton Memo, which explicitly mentions “the circumstance of the persons’ arrival in the U.S. . . particularly if the alien came to the United States as a child.”

Citizenship frames emphasizing humanitarian concerns also underscore the interpersonal costs of deportation. Half of the alerts mentioned that the individual had no ties to his country of origin or that he would suffer if deported. For example, an action alert for Julio M. included the following: “He barely knows his family in Honduras. . . Also, there is a lot of crime in Honduras and his family is scared for his safety.”¹⁸ Julio’s story aligns with another of the Morton Memo’s priorities for deportation: “condition in the [home] country.” Finally, humanitarian concerns may also focus on vulnerable family members, friends, or the broader impacts of the impending deportation. For instance, we learn of Marlen M.’s traumatic arrest after ICE discovered she was working without legal documents:

17 Campaign for Balal P. (Pakistan), student, New York, November 2011.

18 Campaign for Julio M. (Honduras), student, Kentucky, March 2010.

In 2008, as she slept with her 8-month old son in her hands, ICE showed up at her house. . . She would spend the next four months in jail and detention all because she needed to work to provide for her family. She now faces deportation from the only country she knows. Worst of all, she faces separation from her husband, a legal resident, and her two sons, both American citizens.¹⁹

This alert invokes Marlen's innocence by mentioning that her only crime was trying to work; yet it also underscores the harsh consequences for her husband and U.S. citizen children. As in Marlen's action alert, traumatic conditions of the arrest were often cited as a way to garner sympathy for the subject. For example, the following three quotes appeared in action alerts:

Mario has no criminal record but came to the attention of ICE due to traffic violations.²⁰
Deyvid, who dreams of becoming a Christian pastor, was on his way to Bible College . . . when immigration agents boarded his Greyhound bus and detained him.²¹

On a September morning, just before dawn, ICE came knocking on Fredd R.'s door. It was 5 a.m. and Fredd was asleep after a long night of studying for his exam at Guilford Technical Community College that very same day.²²

These quotes position deportation is a harsh punishment for something as minor as routine traffic violations or being in the wrong place at the wrong time. Events like raids and checkpoints are described as surprise assaults, furthering a sense of empathy for the individuals involved.

Comparing Cases: Anti-Deportation Campaigns for Students vs. Non-students

While most of the cases until 2012 focused on immigrant students facing deportation, after the Obama administration announced the DACA program in June 2012, the campaign tactics took a marked shift. Of the 26 cases that took place after June 2012, only four were for students. Table Two shows that while anti-deportation campaigns rely on specific tropes of citizenship and belonging, there are notable differences between cases for students and non-students. Of course, many non-student campaign subjects came to the United States as adults; therefore, their cases necessarily cannot emphasize the story of the straight-A student, the childhood arrival, or the deeply integrated "All-American" kid. For instance, 27 percent of student campaigns described the subject as "All-American" or "just like everyone else," while only seven percent of non-student campaigns employed this tactic. On the contrary, while 26 percent of student campaigns chose to describe the subject as a "good/hard worker" this number jumped to nearly half (46 percent) for non-student campaigns.

Though both types of campaigns use citizenship frames, they do so differently across student and non-student groups. As Table Two shows, stories of individual innocence were much more common in student vs. non-student cases (2.1 vs. 1.4 on a scale of up to 5 criteria from the Morton memo). On the other hand, tropes of family suffering were used almost twice as often for non-students than for students (1.3 vs. 0.7). For example, DA waged a July 2012 campaign for Maximino H., who had been detained for eight months at the time of his campaign:

Maximino was fishing with his children . . . when a Forest Guard came over to inquire about his name and immigration status. . . Maximino. . . has been living in the United States for the past nineteen years. . . According to the memo issued by John Morton, Maximino is a low-priority case and should be granted favorable exercise of prosecutorial discretion. Maximino has no

19 Campaign for Marlen M. (Mexico), non-student, Arizona, August 2010.

20 Campaign for Mario P. (Mexico), student, Texas, February 2011.

21 Campaign for Deyvid M. (Mexico), student, Utah, February 2012.

22 Campaign for Fredd R. (Guatemala), student, North Carolina, September 2010.

criminal record and instead is the main provider for a wife and five children, who also depend on him as a caregiver. Please help keep Maximino in the country that he considers home so that he can remain with his family and help take care of them.²³

This alert reveals familiar themes of citizenship as acculturation (long-time U.S. residence) and innocence (he has no criminal record and his wife and children would suffer greatly if he was deported). However, the alert employs different tactics than those often found in student campaigns. Instead of emphasizing Maximino's individual innocence and the personal suffering his deportation might cause, it focuses instead on his role as a caregiver and the negative impact his removal would have on his family.

Campaign outcomes (e.g., petition signatures and media coverage) also varied between students and non-students. I was able to compile the total number of petition signatures for 56 cases in which tracking software built into the online petitions. As Table Two shows, the campaigns generated between 158 and almost 39,000 signatures, with a median of 1,834 signatures. Yet, student and non-student cases displayed variation in the median number of petitions collected, with students' median petition amounts more than doubling the petitions received by non-students. In terms of media coverage, while 43 percent of the total cases received a media hit, this coverage was inconsistent: 54 percent of student cases received media hits compared to only 24 percent of non-student cases (Patler and Gonzales 2015).

Though the organizations did not consistently keep or release data on whether the subject was allowed to stay in the United States, case results also varied between students and non-students. Of the 35 cases for which I was able to compile results, 27 subjects (77 percent) were allowed to stay in the country through prosecutorial discretion or release from detention. However, while 95 percent of students whose campaign outcomes were available were allowed to stay in the United States, only 50 percent of the non-students were allowed to stay. Though these numbers may not be representative of the cases overall, they suggest differential tactics and outcomes across student vs. non-students.

Overall, though activists used different tactics in student vs. non-student campaigns, they consistently used citizenship framing, even in what many would consider "imperfect" or potentially "unwinnable" cases. In one example, DA mounted a public non-student campaign for Andrea H., a former sex worker who was well known for blogging about sex with famous musicians. After being detained for two years, an Immigration Judge had ordered Andrea's deportation, stating: "The Court finds that the Respondent's behavior as an online persona is a significant negative equity."²⁴ At this point, DA and a partner organization began an online petition for Andrea. Using citizenship frames emphasizing humanitarian concerns, the petition states:

When Andrea was just 14, she was kidnapped and forced into prostitution. During this ordeal she was really traumatized; she was constantly beaten, and even forced to have a mis-carriage [*sic*] at one point. At the age of 19 Andrea was finally freed; she found solace online where she formed the persona [internet name], an online personality with 250,000 followers.²⁵

While the petition mentions Andrea's online persona, it does not mention her history of blogging about sex, instead recounting a childhood of sexual abuse and forced prostitution. Later, Andrea is referred to as a "Dreamer" because she came to the United States at eight years old. As with many other non-student cases, the petition also mentions the damage Andrea's detention is causing others: "Despite all of this ICE is refusing to release her to the care of her mother and her 3-year old son."

23 Campaign for Maximino H. (Mexico), non-student, Florida, July 2012.

24 Campaign for Andrea H. (Venezuela), non-student, Louisiana, November 2012.

25 Campaign for Andrea H. (Venezuela), non-student, Louisiana, November 2012.

As a result of DA's activism, Andrea's deportation was eventually canceled. In a subsequent media interview, Andrea cited the campaign as critical to the changed decision: "Once immigration [ICE] started getting that publicity and they started looking like monsters, that's what helped me."²⁶ Andrea's case is unique for a public campaign because it involved someone whose history might have made it more difficult to garner public sympathy. Yet even in this instance, the organizations used citizenship frames to reframe Andrea's story to that of an innocent victim whose family would suffer greatly without her.

DISCUSSION AND CONCLUSION

This research sought to shed light on how certain groups of undocumented immigrants, despite their marginalized status, are able to make claims for legal and social recognition. Through an analysis of 125 anti-deportation campaigns led by undocumented youth organizations in the United States between February 2009 and December 2012, I show how organizations utilized a coordinated model using *citizenship frames*. Citizenship frames are a type of collective action frame (Benford and Snow 2000) based in normative and legal definitions of citizenship and belonging. These frames emphasize several indicators of citizenship as acculturation and civic engagement: educational status and accomplishments, feelings of belonging or "Americanness", and ties or contributions to the community, including work history. Citizenship frames also underscore humanitarian concerns to portray certain immigrants as innocent or deserving. Though humanitarian concerns may not generally be associated with the practice of citizenship, like citizenship frames of acculturation and civic engagement, they reflect normative notions of deservingness built into immigration policies and prosecutorial discretion guidelines. These frames demonstrate that legal categories of belonging can be fluid and up to discretion.

Citizenship frames mirror and are mirrored by laws and policies. As I showed, citizenship frames map onto notions of membership and deservingness present in existing immigration laws (e.g., naturalization laws), court decisions (e.g., *Plyler v. Doe*), and discretionary guidelines and programs (e.g., ICE's enforcement priority memos). Yet citizenship frames are also reflected in recent changes to laws and guidelines such as the announcement of the DACA program and the Morton memo's inclusion of student status as a deprioritizing factor for deportation. Though previous studies have explored the mobilization of "model immigrant" characteristics and other tropes of deservingness (Fujiwara 2005, Yukich 2013), I extend this work by demonstrating the link between social movement framing and laws and policies. I also build on existing research on anti-deportation claims-making that has tended to focus on *who* is mobilized (in general, citizens on behalf of noncitizens), as well as *why* mobilizations are more or less effective at different stages of the policy process (Anderson, Gibney and Paoletti 2011, Ellermann 2009, Freedman 2011). By demonstrating a nationally coordinated model, I show how anti-deportation cases are the result of a coordinated social movement using citizenship framing.

My findings reveal that campaign strategies change depending on the political moment. The campaigns clustered in the weeks and months leading up to Congressional action on the DREAM Act, as well as the release of the Morton memo and the announcement of DACA. By aligning with different aspects of the policy cycle, anti-deportation campaigns serve not only to highlight the harms of deportation but also to build support for legislation and policy that would address current and future deportations. In this way, the campaigns contain both diagnostic and prognostic elements (Cress and Snow 2000).

My results also demonstrated differences between campaigns for students and non-students. Student cases predominated in the period leading up to the DREAM Act's December 2010 failure. However, after the June 2011 Morton Memo, and especially after DACA's introduction, campaign

26 Downs, Ray. April 4, 2013. "Kat Stacks Is a Real American Hero, Bitch." *VICE*. Available at: <http://www.vice.com/read/kat-stacks-is-a-real-american-hero-bitch> (retrieved November 1, 2015).

tactics began to shift markedly. DA in particular expanded its work by waging campaigns almost exclusively for non-students. This change in campaign subjects also begat a change in tactics: While student cases highlighted the detrimental impacts of deportation on the students themselves, non-student cases focused on the impacts of deportation on *others*. As evidenced in court cases like *Plyler v. Doe*, as well as in the Morton Memo, the liminally legal status of undocumented young people provides protection from government regulation that is less available to groups deemed farther from full citizenship and therefore offers them a different array of tactics to choose from in making claims (Motomura 2014, Nakano Glenn 2011). However, though campaign tactics vary between subjects and across political moments, all campaigns use some combination of citizenship frames.

An understanding of citizenship framing is particularly useful for ongoing political debates, as it may help explain why and how some groups of immigrants are more successful in quelling negative public sentiment than others. Studies of group threat have demonstrated the spread and consequences of anti-immigrant sentiment in the United States, as well as the association between immigrant rights infrastructure and reductions in anti-immigrant actions (Ebert and Okamoto 2015, Stewart et al. 2015). The present study provides a parallel story of how undocumented youth activists used citizenship frames to reposition campaign subjects as citizens but for papers. For example, my analysis may be especially relevant in the wake of growing public and political concern about the arrival of unaccompanied minors to the United States from Mexico and Central America. This latter group of children have fared relatively poorly in mainstream media portrayals and have even become the subject of anti-immigrant protests (Silva and Ramakrishnan 2015). Though unaccompanied minors and Dreamers are both young people, Dreamers' extensive acculturation and civic engagement, based in normative notions of citizenship, have garnered them widespread political sympathy that may be unavailable to unaccompanied minors. Citizenship frames provide an analytical tool for understanding this divide.

One might wonder whether citizenship frames may be differently effective across political moments and opportunities. As I have shown, citizenship frames change depending on the political context, with campaign tactics expanding after DACA's introduction to include non-students and "imperfect" cases. If we were to face a political future characterized by anti-immigrant sentiment—e.g. the dismantling of DACA, as has been promised by the leading conservative presidential candidates in the 2016 election—it is likely that citizenship framing would become increasingly important, especially when utilized to protect individual immigrants who no longer have the option of a large-scale anti-deportation program like DACA.

Social movements literature shows that advocacy organizations tend to select the most sympathetic cases to promote their goals (e.g., Keck and Sikkink 1998, Yukich 2013). The same is true for the anti-deportation campaigns in this study. Indeed, my sample does not represent all attempts by undocumented youth organizations or others to stop deportations. Rather, my aim was to analyze campaigns that are waged publicly, using social media petitions, outreach to politicians and the media, etc. At first glance, therefore, it may be unsurprising to observe similar framing across cases. However, my goal was precisely to analyze the content of these public frames, as well as how they reflect and are reflected by existing laws and policies. These cases represent the type of public messaging that undocumented youth organizations use to counter and shape the debate about undocumented immigrants in the United States. They show how citizenship frames are used to challenge deportation, even in "imperfect" cases.

Anti-deportation campaigns are a powerful illustration of the ways that undocumented immigrants, in spite of their precarious legal status, can make claims for recognition. By claiming the "right" to remain in the U.S., undocumented immigrants are, in a sense, enacting their own political existence (Isin and Rygiel 2007). However, though anti-deportation campaigns may appear to challenge government power directly, my findings show that strategic and inherently nationalistic presentations of citizenship also work to maintain state sovereignty and uphold paradigms of a particular type of "good" or "supercitizen" immigrant (Honig 2001). To be sure, citizenship frames are

constrained by the notions of belonging embedded in immigration laws and policies that prioritize rights for certain groups of immigrants. For example, cases that emphasize the innocence of children “brought” to the United States by their parents may ultimately shift blame off children and onto their adult parents. Indeed, the blaming of immigrant parents has been documented in literature on the mainstream media’s negative representations of Latina immigrant fertility and so-called “anchor babies” (Chavez 2008). Likewise, the campaigns’ emphasis on educational outcomes may perpetuate the assumption that immigrants who do not meet high educational standards are less deserving of recognition (Covarrubias and Lara 2013). In this way, citizenship frames may ultimately reinforce the alienation of immigrants considered “less desirable” (Yukich 2013).

Given the potential for citizenship framing to perpetuate paradigms of “good-bad” or “deserving-undeserving,” in recent years, many young immigrant activists have become increasingly critical of positioning certain immigrants as more deserving than others (Nicholls 2013, Schwartz 2016). Additional research is needed to highlight the efforts of immigrant activists to go beyond citizenship frames that may produce and reproduce divisions into categories of “good” and “bad” immigrant (Schwartz 2016:611). Future research could examine, for example, the evolution of organizational strategies in the current political context in which comprehensive immigration reform has become an ever more elusive goal, even as enforcement programs continue to expand. Such research would speak directly to policy debates and grassroots organizing efforts alike.

APPENDIX A

Selected excerpts from: “Exercising Prosecutorial Discretion Consistent with the Priorities of the Agency for the Apprehension, Detention, and Removal of Aliens.” (John Morton, Director of ICE, June 2011)¹

When weighing whether an exercise of prosecutorial discretion may be warranted for a given alien, ICE officers, agents, and attorneys should consider all relevant factors, including, but not limited to—

- Length of presence in the United States;
- The circumstances of the person’s arrival in the United States and the manner of his or her entry, particularly if the alien came to the United States as a young child;
- The person’s pursuit of education in the United States, with particular consideration given to those who have graduated from a U.S. high school or have successfully pursued or are pursuing a college or advanced degrees at a legitimate institution of higher education in the United States;
- Criminal history, including arrests, prior convictions, or outstanding arrest warrants;
- Immigration history, including any prior removal, outstanding order of removal, prior denial of status, or evidence of fraud;
- Whether the person poses a national security or public safety concern;
- Ties and contributions to the community, including family relationships;
- Ties to the home country and condition in the country;
- Age, with particular consideration given to minors and the elderly;
- Whether the person has a U.S. citizen or permanent resident spouse, child, or parent;
- Whether the person is the primary caretaker of a person with a mental or physical disability, minor, or seriously ill relative;
- Whether the person or the person’s spouse is pregnant or nursing;
- Whether the person or the person’s spouse suffers from severe mental or physical illness;

1 Available at: <http://www.ice.gov/doclib/secure-communities/pdf/prosecutorial-discretion-memo.pdf> (retrieved March 5, 2015).

- Whether the person is likely to be granted temporary or permanent status or other relief from removal, including as a relative of a U.S. citizen or permanent resident; an asylum seeker, or a victim of domestic violence, human trafficking, or other crime;
- Whether the person is currently cooperating or has cooperated with federal, state or local law enforcement authorities.

REFERENCES

- Plyler *V. Doe*, (457 U.S. 202 1982).
- Abrego, Leisy J. 2011. "Legal Consciousness of Undocumented Latinos: Fear and Stigma as Barriers to Claims-Making for First- and 1.5-Generation Immigrants." *Law & Society Review* 45(2):337-69.
- Alba, Richard D. and Victor Nee. 2003. *Remaking the American Mainstream: Assimilation and Contemporary Immigration*. Cambridge, MA: Harvard University Press.
- Anderson, Bridget, Matthew J. Gibney and Emanuela Paoletti. 2011. "Citizenship, Deportation and the Boundaries of Belonging." *Citizenship Studies* 15(5):547-63.
- Asian Law Caucus, Educators for Fair Consideration, DreamActivist.org and National Immigrant Youth Alliance. 2011. "Education Not Deportation: A Guide for Undocumented Youth in Removal Proceedings." Retrieved: October 4, 2016 (http://www.e4fc.org/images/E4FC_DeportationGuide.pdf).
- Benford, Robert D. and David A. Snow. 2000. "Framing Processes and Social Movements: An Overview and Assessment." *Annual Review of Sociology* 26:611-39.
- Bosniak, Linda. 2006. *The Citizen and the Alien: Dilemmas of Contemporary Membership*. Princeton and Oxford: Princeton University Press.
- Bosworth, Mary. 2011. "Deportation, Detention and Foreign-National Prisoners in England and Wales." *Citizenship Studies* 15(5):583-95.
- Brubaker, William Rogers. 1989. "Membership without Citizenship: The Economic and Social Rights of Noncitizens." in *Immigration and the Politics of Citizenship in Europe and North America*, edited by W. R. Brubaker. New York: University Press of America.
- Cebulko, Kara. 2014. "Documented, Undocumented, and Liminality Legal: Legal Status During the Transition to Adulthood for 1.5-Generation Brazilian Immigrants." *The Sociological Quarterly* 55(1):143-67.
- Chavez, Leo R. 2008. *The Latino Threat: Constructing Immigrants, Citizens, and the Nation*. Stanford: Stanford University Press.
- Coutin, Susan B. 2000. "Denationalization, Inclusion, and Exclusion: Negotiating Boundaries of Belonging." *Indiana Journal of Global Legal Studies* 7(2):585-93.
- Coutin, Susan Bibler. 2003. "Suspension of Deportation Hearings and Measures of "Americanness"." *Journal of Latin American Anthropology* 8(2):58-95.
- . 2011. "The Rights of Noncitizens in the United States." *Annual Review of Law & Social Science* 7:289-308.
- Covarrubias, Alejandro and Argelia Lara. 2013. "The Undocumented (Im) Migrant Educational Pipeline: The Influence of Citizenship Status on Educational Attainment for People of Mexican Origin." *Urban Education* 49(1):75-110.
- Cress, Daniel M. and David A. Snow. 2000. "The Outcomes of Homeless Mobilization: The Influence of Organization, Disruption, Political Mediation, and Framing." *American Journal of Sociology* 105(4):1063-104.
- Earl, Jennifer and Katrina Kimport. 2011. *Digitally Enabled Social Change: Activism in the Internet Age*. Cambridge, MA: Massachusetts Institute of Technology Press.
- Ebert, Kim and Dina Okamoto. 2015. "Legitimizing Contexts, Immigrant Power, and Exclusionary Actions." *Social Problems* 62(1):40-67.
- Ellermann, Antje. 2009. *States against Migrants: Deportation in Germany and the United States*. New York: Cambridge University Press.
- Freedman, Jane. 2011. "The Réseau Education Sans Frontières: Reframing the Campaign against the Deportation of Migrants." *Citizenship Studies* 15(5):613-26.
- Fujiwara, Lynn H. 2005. "Immigrant Rights Are Human Rights: The Reframing of Immigrant Entitlement and Welfare." *Social Problems* 52(1):79-101.
- Gleeson, Shannon and Roberto G. Gonzales. 2012. "When Do Papers Matter? An Institutional Analysis of Undocumented Life in the United States." *International Migration* 50(4):1-19.
- Golash-Boza, Tanya and Pierrette Hondagneu-Sotelo. 2013. "Latino Immigrant Men and the Deportation Crisis: A Gendered Racial Removal Program." *Latino Studies* 11(3):271-92.

- Gonzales, Roberto G. 2008. "Left out but Not Shut Down: Political Activism and the Undocumented Student Movement." *Northwestern Journal of Law & Social Policy* 3(2):219.
- . 2011. "Learning to Be Illegal: Undocumented Youth and Shifting Legal Contexts in the Transition to Adulthood." *American Sociological Review* 76(4):602-19.
- Hagan, Jacqueline Maria, Nestor Rodriguez and Brianna Castro. 2011. "Social Effects of Mass Deportations by the United States Government, 2000–10." *Ethnic and Racial Studies* 34(8):1374-91.
- Honig, Bonnie. 2001. *Democracy and the Foreigner*. Princeton and Oxford: Princeton University Press.
- Immigration Policy Center. 2013. "A Decade of Rising Immigration Enforcement." Vol. Washington, D.C.
- Insin, Engin F. and Kim Rygiel. 2007. "Abject Spaces: Frontiers, Zones, Camps." Pp. 183-203 in *Logics of Biowar and the War on Terror*, edited by E. Dauphinee and C. Masters. Houndsmills, Basingstoke, Hampshire: Palgrave.
- Kasinitz, Philip, John Mollenkopf and Mary Waters. 2008. *Inheriting the City: The Children of Immigrants Come of Age*. New York: Russell Sage Foundation.
- Keck, Margaret E. and Kathryn Sikkink. 1998. *Activists Beyond Borders: Advocacy Networks in International Politics*. Ithaca: Cornell University Press.
- Massey, Douglas S., Jorge Durand and Nolan J. Malone. 2002. *Beyond Smoke and Mirrors: Mexican Immigration in an Era of Economic Integration*. New York: Russell Sage Foundation.
- Meissner, Doris. 2000. "Standard Operating Procedures for Enforcement Officers: Arrest, Detention Processing, and Removal, Part X." Washington, D.C.: Immigration and Naturalization Services.
- Menjívar, Cecilia. 2006. "Liminal Legality: Salvadoran and Guatemalan Immigrants' Lives in the United States." *American Journal of Sociology* 111(4):999-1037.
- Menjívar, Cecilia and Susan Bibler Coutin. 2014. "Challenges of Recognition, Participation, and Representation for the Legally Liminal: A Comment." Pp. 325-30 in *Migration, Gender and Social Justice*, edited by T.-D. Truong, D. Gasper, J. Handmaker and S. I. Berg. Heidelberg & New York: Springer.
- Morando Lakhani, Sarah. 2013. "Producing Immigrant Victims' "Right" to Legal Status and the Management of Legal Uncertainty." *Law & Social Inquiry* 38(2):442-73.
- Morton, John. 2011. "Exercising Prosecutorial Discretion Consistent with the Civil Immigration Enforcement Priorities of the Agency for the Apprehension, Detention, and Removal of Aliens." Washington, D.C.: Immigration and Customs Enforcement.
- Motomura, Hiroshi. 2014. *Immigration Outside the Law*. New York, NY: Oxford University Press.
- Nakano Glenn, Evelyn. 2011. "Constructing Citizenship: Exclusion, Subordination, and Resistance." *American Sociological Review* 76(1):1-24.
- Napolitano, Janet. 2012. "Exercising Prosecutorial Discretion with Respect to Individuals Who Came to the United States as Children." Washington, D.C. : Department of Homeland Security.
- Ngai, Mae M. 2004. *Impossible Subjects: Illegal Aliens and the Making of Modern America*. Princeton, N.J.: Princeton University Press.
- Nicholls, Walter J. 2013. *The Dreamers: How the Undocumented Youth Movement Transformed the Immigrant Rights Debate*. Palo Alto: Stanford University Press.
- Passel, Jeffrey S. and D'Vera Cohn. 2011. "Unauthorized Immigration Population: National and State Trends, 2010." Washington, D.C.: Pew Hispanic Center.
- Patler, Caitlin and Roberto G. Gonzales. 2015. "Framing Citizenship: Media Coverage of Anti-Deportation Cases Led by Undocumented Immigrant Youth Organizations." *Journal of Ethnic and Migration Studies* 41(9):1453-74.
- Portes, Alejandro and Rubén G. Rumbaut. 2001. *Legacies: The Story of the Immigrant Second Generation*. Berkeley and Los Angeles: University of California Press.
- Rincón, Alejandra. 2008. *Undocumented Immigrations and Higher Education: Sí Se Puede!* New York: LFB Scholarly Publications LLC.
- Santa Ana, Otto. 2013. *Juan in a Hundred: The Representation of Latinos on Network News*. Austin: University of Texas Press.
- Schwartz, Helge. 2016. "Transformations of the Undocumented Youth Movement and Radical Egalitarian Citizenship." *Citizenship Studies* 20(5):610-28.
- Seif, Hinda. 2004. "'Wise Up!' Undocumented Latino Youth, Mexican-American Legislators, and the Struggle for Higher Education Access." *Latino Studies* 2(2):210-30.
- Silva, Andrea and S. Karthick Ramakrishnan. 2015. "The News That Didn't Bark: Media (Non)Coverage of the Unaccompanied Minor Crisis." in University of California International Migration Conference. Riverside, CA.
- Stewart, Eric A., Ramiro Martinez, Eric P. Baumer and Marc Gertz. 2015. "The Social Context of Latino Threat and Punitive Latino Sentiment." *Social Problems* 62(1):68-92.

- Stumpf, Juliet P. 2006. "The Crimmigration Crisis: Immigrants, Crime, and Sovereign Power." *American University Law Review* 56(2):367-419.
- Valdivia Ordorica, Carolina. 2015. "Dreamer Activism: Challenges and Opportunities." Pp. 163-78 in *Undocumented Latino Youth : Navigating Their Worlds*, edited by M. Clark-Ibanez. Boulder, CO: Lynne Rienner Publishers.
- Welch, Kelly, Allison Ann Payne, Ted Chiricos and Marc Gertz. 2011. "The Typification of Hispanics as Criminals and Support for Punitive Crime Control Policies." *Social Science Research* 40(3):822-40.
- Yukich, Grace. 2013. "Constructing the Model Immigrant: Movement Strategy and Immigrant Deservingness in the New Sanctuary Movement." *Social Problems* 60(3):302-20.