

September 17, 2022

VIA EMAIL

Rachael S. Rollins
United States Attorney for the District of Massachusetts
John Joseph Moakley
United States Federal Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210

Re: Criminal Investigation Of Abuse Of Immigrants/Martha's Vineyard Incident

Dear U.S. Attorney Rollins:

Lawyers for Civil Rights (LCR) represents approximately 30 immigrants who were flown to Martha's Vineyard earlier this week as part of a shameful political stunt. Since shortly after the planes arrived, LCR legal staff have been on the ground on Martha's Vineyard, and now at Joint Base Cape Cod, interviewing affected individuals and gathering factual information.

While we are working to protect our clients' rights in immigration proceedings and exploring remedies for civil rights violations, we also strongly believe that criminal laws were broken by the perpetrators of this stunt. We therefore ask that you open a criminal investigation into this matter.

Our clients were induced to board airplanes and cross state lines under false pretenses. Individuals, working in concert with the Florida Governor, made numerous false promises to our clients, including of work opportunities, schooling for their children, and immigration assistance, in order to induce them to travel. It was only when the flight was in mid-air that they were informed they would be flown to Martha's Vineyard, rather than to Boston as many had been told. Once the planes landed, those who had induced our clients to travel under these false pretenses disappeared, leaving our clients to learn that the offers of assistance had all been a ruse to exploit them for political purposes.

This conduct deprived our clients of their liberty by deception. It interfered with their ability to comply with federal immigration obligations, such as attendance at hearings and check-ins. The perpetrators targeted our clients based on race and national origin in order to make the political point they wanted. They preyed on the vulnerability of our clients – many of whom had suffered deep trauma in their home countries and on their journeys to the United States – and exploited this vulnerability to win trust through false promises.

These actions were coordinated and orchestrated. Many of our clients were put up in hotels – paid for by those making the false representations – until flights could be coordinated and there were enough people to fill the planes. This type of conspiracy to deprive our clients of their liberty and



civil rights and interfere with federal immigration proceedings must be thoroughly investigated for violations of criminal laws.

We were heartened to see your public statements that you will be consulting with federal authorities in other localities that have seen similar conduct. As detailed above, these actions constitute concerted interference by State actors in federal immigration enforcement. That demands a strong federal response.

We and our clients stand willing to help in a criminal investigation in any way that we can. In addition to extensive information gained through client interviews, we have also gathered documentary evidence, including photos of some of the individual perpetrators, other information that should allow law enforcement to identify and locate them, and documents our clients were required to sign. We are working closely with immigration attorneys, including Susan Church, Rachel Self, and Julio Henriquez, who represent some of these clients in their individual immigration proceedings as well.

Thank you in advance for your assistance in this matter.

Sincerely,

Iván Espinoza-Madrigal, Executive Director
Oren Sellstrom, Litigation Director