

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

RÜMEYSA ÖZTÜRK,

Petitioner,

v.

DONALD J. TRUMP, in his official capacity as President of the United States; PATRICIA HYDE, in her official capacity as the New England Field Office Director for U.S. Immigration and Customs Enforcement; MICHAEL KROL, in his official capacity as HSI New England Special Agent in Charge, U.S. Immigration and Customs Enforcement; TODD LYONS, in his official capacity as Acting Director, U.S. Immigration and Customs Enforcement; KRISTI NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; and MARCO RUBIO, in his official capacity as Secretary of State,

Respondents.

Civil Action No. 2:25-CV-00374-WKS

**AMICI CURIAE BRIEF OF 27 AMERICAN JEWISH ORGANIZATIONS IN SUPPORT
OF PETITIONER RÜMEYSA ÖZTÜRK'S PETITION FOR WRIT OF HABEAS
CORPUS AND MOTION FOR RELEASE UNDER *MAPP V. RENO*, OR IN THE
ALTERNATIVE, FOR RETURN TO VERMONT**

I. STATEMENT OF IDENTIFICATION OF *AMICI*

The following American Jewish congregations and organizations join in this *amici* brief in support of Petitioner Rümeyşa Öztürk’s petition for writ of habeas corpus (the “Petition”) and motion for release under *Mapp v. Reno*, or in the alternative, for return to Vermont (the “Motion for Release”):

- Ansche Chesed
- Bend the Arc: A Jewish Partnership for Justice
- B'nai Jeshurun
- Congregation Beth Elohim
- Congregation Dorshei Tzedek (West Newton, MA)
- Habonim Dror
- Harvard Jewish Progressive Alumni
- IKAR
- J Street
- Jewish Alliance for Law and Social Action
- Jewish Center for Justice
- Jewish Labor Committee
- Keshet
- Leo Baeck Temple
- Ma’yan Tikvah
- New England Jewish Labor Committee
- New Israel Fund
- New Jewish Narrative
- New York Jewish Agenda
- Nexus Project
- T’ruah: The Rabbinic Call for Human Rights
- Temple Emanu-El (San Francisco, CA)
- Temple Micah (Washington, D.C.)
- The Boston Workers Circle
- The Reconstructionist Rabbinical Association
- The Workers Circle
- Worcester Havurah

For descriptions of the *amici*, please see Appendix A attached hereto.

II. INTRODUCTION AND INTEREST OF *AMICI*

Amici are American Jewish congregations and organizations who revere the Constitution and cherish its guarantee of freedom of speech. Without presuming to speak for all of Jewish

America—a diverse community that holds a multitude of viewpoints—*amici* are compelled to file this brief because the arrest, detention and potential deportation of Rümeysa Öztürk for her protected speech violate the most basic constitutional rights.

Öztürk, a Turkish national PhD student at Tufts University, co-authored a March 2024 op-ed in her school newspaper, *The Tufts Daily*, criticizing the University’s response to the Tufts undergraduate student senate’s resolutions calling for divestment from Israel and characterizing Israel’s military actions in Gaza as a genocide. While many *amici* may disagree with these sentiments, nothing in the op-ed violates any law. In short, it peacefully expressed dissent and called for action.

On March 25, 2025, six masked plain-clothes officers apprehended Öztürk on the street as she was going to an iftar dinner to break her Ramadan fast. They surrounded her, handcuffed her, placed her in a vehicle, and eventually transported her to an Immigration and Customs Enforcement facility in Louisiana. The video of the arrest was alarming. It was later revealed that Secretary of State Marco Rubio had revoked Öztürk’s student visa without notice to her, solely because she had co-authored the op-ed. As set forth in a letter addressed to Öztürk, the government appears to justify these extraordinary measures under a rarely-invoked statute that expressly prohibits the Secretary of State from detaining and removing a noncitizen because of their “past, current, or expected beliefs, statements, or associations,” when lawful within the United States. But the same statute includes an unconstitutionally vague exception allowing deportation if an individual’s presence is deemed to “compromise a compelling U.S. foreign policy interest.” *Amici* cannot fathom how Öztürk’s continued presence in this country, nor how her freedom pending any immigration decision, poses such a threat.

The Administration claims its actions against Öztürk support efforts to combat

antisemitism—a goal that, on its face, is laudable. Antisemitism is a persistent scourge that has threatened the Jewish people for centuries, and about which *amici*, like Jews everywhere, remain ever-vigilant. But arresting, detaining, and potentially deporting Öztürk does not assist in eradicating antisemitism. Nor was that the government’s apparent purpose. The government instead appears to be exploiting Jewish Americans’ legitimate concerns about antisemitism as pretext for undermining core pillars of American democracy, the rule of law, and the fundamental rights of free speech and academic debate on which this nation was built.

Jewish people came to America to escape generations of similar predations. Yet the images of Öztürk’s arrest in twenty-first century Massachusetts evoke the oppressive tactics employed by the authoritarian regimes that many ancestors of *amici*’s members left behind in Odessa, Kishinev, and Warsaw, among a great many others. To watch state authorities undermine the same fundamental rights that empowered so many Jewish Americans is chilling; to know it is being done in the name of the Jewish people is profoundly disturbing. And if anything, *amici* believe such unjust treatment of lawful residents like Öztürk will *aggravate* risks to American Jews, not ease them.

Our Constitution secures to all students and scholars, including noncitizens, the right to peacefully express political beliefs without fear of government reprisal. Öztürk’s constitutionally protected expression does not, and cannot, cause her continued presence in the U.S. to compromise a compelling U.S. foreign policy interest as the Secretary of State claims. Our foreign policy is not so fragile that an op-ed in a student newspaper could so easily compromise it, and our constitutional guarantees are not so feeble that they may be so easily discarded. The Court should grant the Petition and the Motion for Release.

III. ARGUMENT

A. The First Amendment Prohibits Punishing Noncitizens Because Of Their Protected Speech.

It is well-settled that “[f]reedom of speech and of press is accorded aliens residing in this country.” *Bridges v. Wixon*, 326 U.S. 135, 148 (1945). While the government may have broad discretion to deny entry to noncitizens, “once an alien lawfully enters and resides in this country he becomes invested with the rights guaranteed by the Constitution to all people within our borders.” *Id.* at 161 (Murphy, J., concurring); *see also Rafeedie v. I.N.S.*, 795 F. Supp. 13, 22 (D.D.C. 1992).¹

Immigration laws permitting the government to deport a foreign resident who merely “advocates or teaches . . . proscribed political doctrines” are unconstitutionally overbroad. *Rafeedie*, 795 F. Supp. at 22-23 (invalidating former 8 U.S.C. §§ 1182(a)(27) and (a)(28)(f) as overbroad). Federal courts have likewise enjoined attempts to detain, deport, or otherwise punish lawful foreign residents because they expressed views the government opposed. *See, e.g., Ragbir v. Homan*, 923 F.3d 53, 71-72 (2d Cir. 2019), *cert granted, judgement vacated on other grounds*, 141 S. Ct. 227 (2020); *Bello-Reyes v. Gaynor*, 985 F.3d 696, 702 (9th Cir. 2021) (bond revocation); *Gutierrez-Soto v. Sessions*, 317 F. Supp. 3d 917, 921-22 (W.D. Tex. 2018) (parole revocation); *Rueda Vidal v. U.S. Dep’t of Homeland Sec.*, 536 F. Supp. 3d 604, 619–623 (C.D. Cal. 2021)

¹ The Supreme Court has never retreated from its holding that the First Amendment protects noncitizens living in the United States. Although *Harisiades v. Shaughnessy*, 342 U.S. 580, 592 & nn.18-19 (1951) permitted the deportation of a non-citizen resident speaker, it did so only because the non-citizen’s speech was unlawful incitement to violence not protected by the First Amendment. And while *Kleindienst v. Mandel*, 408 U.S. 753, 770 (1972) declined to find that American audiences possess a First Amendment right to bring a foreign speaker into the United States from abroad, it left undisturbed *Bridges’* holding that the First Amendment applies without qualification to noncitizen speakers already on American soil. Each of these cases are easily distinguishable, as the only asserted basis for the actions taken against Öztürk was her co-authorship of the op-ed while a student in Massachusetts.

(denial of DACA application).

The government’s pretextual assertion of U.S. foreign policy interests cannot justify its censorship of noncitizen speakers. *See generally* David Cole, *The First Amendment’s Borders*, 6 Harv. L. & Pol’y Rev. 147 (2012). Foreign policy or national defense “cannot be invoked as a talismanic incantation” to support any government action “which can be brought within its ambit.” *United States v. Robel*, 389 U.S. 258, 263 (1967). “Implicit in the term ‘national defense’ is the notion of defending those values and ideals which set this Nation apart,” and the risks inherent in a free society have never licensed the government to trammel the foundational expressive liberties that “make[] defense of the Nation worthwhile.” *Id.* at 264. Enforcing the First Amendment’s protections for all speakers in the United States only “highlights the cherished values of our constitutional framework.” *Lamont v. Postmaster Gen. of U.S.*, 381 U.S. 301, 310 (1965) (Brennan, J., concurring).

Since the First Amendment applies to foreign students attending American universities, government action to remove such students or revoke their visas must comport with the First Amendment’s protections.

B. The Government’s Arrest, Detention, and Attempted Deportation of Öztürk Violate The First Amendment.

The First Amendment “prohibits government officials from subjecting individuals to ‘retaliatory actions’ after the fact for having engaged in protected speech.” *Houston Cmty. Coll. Sys. v. Wilson*, 595 U.S. 468, 474 (2022) (citation omitted). A violation occurs when (1) a speaker engages in protected speech, (2) the government takes adverse action against her, and (3) the speaker’s exercise of her speech rights is a reason for the government’s action. *See Hannon v. Beard*, 645 F.3d 45, 48 (1st Cir. 2011); *Aref v. Lynch*, 833 F.3d 242, 258 (D.C. Cir. 2016).

The government acknowledges that Öztürk’s protected speech was the basis of her arrest.

“We gave you a visa to come and study and get a degree,” Secretary of State Rubio said of Öztürk, “not to become a social activist that tears up our university campuses.” *Secretary Rubio Defends Revoking Turkish Student’s Visa*, C-SPAN (Mar. 27, 2025), at <https://www.c-span.org/clip/news-conference/secretary-rubio-defends-revoking-turkish-students-visa/5158479>. Yet Öztürk has never been charged with any crime, nor even accused of “tear[ing] up” her college campus. The sole offense the government identifies to date is her co-authoring the opinion essay in March 2024—resurfaced by bloggers in February 2025.² While many *amici* find the op-ed’s assertions deeply misguided, “the government may not prohibit the expression of an idea simply because society finds the idea itself offensive or disagreeable.” *Texas v. Johnson*, 491 U.S. 397, 414 (1989). Öztürk’s essay addressed matters of public concern and constitutes core political speech at “the heart of . . . First Amendment [] protection.” *Snyder v. Phelps*, 562 U.S. 443, 451-52 (2011).

Öztürk was swept off the street, placed in a vehicle, and transferred to a Louisiana prison 1,600 miles away because of opinions she expressed in a student newspaper. This is not who we are. The freedom to express unpopular ideas without risking arrest is “one of the principal characteristics by which we distinguish a free nation.” *Houston v. Hill*, 482 U.S. 451, 463 (1987). If the government could simply “silence those who voice unpopular ideas, little would be left of our First Amendment liberties, and little would separate us from the tyrannies of the past or the malignant fiefdoms of our own age.” *Nieves v. Bartlett*, 587 U.S. 391, 412 (2019) (Gorsuch, J., concurring). Arresting and detaining Öztürk is a betrayal of the constitutional values that attracted *amici* and their families who immigrated to this great country’s shores.

² Rümeyza Öztürk et al., *Try again, President Kumar: Renewing calls for Tufts to adopt March 4 TCU Senate resolutions*, THE TUFTS DAILY (Mar. 26, 2024), at <https://www.tuftsdaily.com/article/2024/03/4ftk27sm6jkj>.

C. The Statute Upon Which The Government Appears To Justify Öztürk’s Arrest, Detention, And Attempted Deportation Is Facially Void For Vagueness.

The government’s actions raise serious constitutional concerns for another reason: to the extent the government invokes 8 U.S.C. § 1227(a)(4)(C)(i) (the “Foreign Policy Ground”) (*see* Doc. No. 12-1), that statute is unconstitutionally vague on its face.

A statute is void for vagueness if it “fails to provide a person of ordinary intelligence fair notice of what is prohibited, or is so standardless that it authorizes or encourages seriously discriminatory enforcement.” *United States v. Williams*, 553 U.S. 285, 304 (2008). Laws regulating expression face an even more stringent test, as vague speech regulations invite arbitrary enforcement against less popular viewpoints and cause speakers to self-censor. *See NAACP v. Button*, 371 U.S. 415, 432, 435 (1963). Extraordinary penalties like removal amplify the risks of vague speech regulation, so courts must apply the “most exacting vagueness standard” when assessing such statutes. *Sessions v. Dimaya*, 584 U.S. 148, 150 (2018) (portion of Immigration and Nationality Act (“INA”) void for vagueness) (citing *Jordan v. DeGeorge*, 341 U.S. 223, 231 (1951)).

The Foreign Policy Ground asserted as a pretext to arrest, detain, and ultimately deport Öztürk fails that test. The law purports to permit deportation of any noncitizen whom the Secretary of State deems to pose “potentially serious adverse foreign policy consequences for the United States. . . .” 8 U.S.C. § 1227(a)(4)(C)(i). And while the law expressly prohibits the Secretary from taking such action against a noncitizen based on their protected “beliefs, statements, or associations,” it nevertheless purports to permit the Secretary to deport a noncitizen if he determines that allowing the individual to remain “would compromise a compelling U.S. foreign policy interest.” *See* 8 U.S.C. § 1227(a)(4)(C)(i)-(ii); 8 U.S.C. § 1182(a)(3)(C)(iii). Importantly, the legislative history states Congress’s intention that the Foreign Policy Ground should be “used

sparingly” and “only in unusual circumstances” and “not merely because there is a likelihood that an alien will make critical remarks about the United States or its policies.” 101 Cong. Rec. 35417 (1990) (enacted).³ But, despite this congressional intent, Secretary Rubio does not appear to acknowledge any material constraints on his discretion to invoke the Foreign Policy Ground to target Öztürk for removal based on her protected speech.

The vagueness doctrine prohibits precisely this kind of discriminatory enforcement against disfavored speakers. *See Button*, 371 U.S. at 432, 435. Without standards delineating what may “compromise[] a compelling U.S. foreign policy interest” (or even what the U.S.’s foreign policy is), noncitizens are left to guess what otherwise protected speech could lead to their detention and deportation. Does all speech expressing solidarity with or even sympathy for the Palestinian people compromise a compelling U.S. foreign policy interest? Should the political winds shift, what is to stop a future Secretary of State from deciding certain pro-Israel speech compromises a compelling U.S. foreign policy interest? Do protests of Russian activities in Ukraine, or conversely of Ukrainian actions in response, compromise a compelling U.S. foreign policy interest? No one can know—the statute’s enforcement delegates plenary censorship authority “on an ad hoc and subjective basis, with the attendant dangers of arbitrary and discriminatory application.” *Grayned v. City of Rockford*, 408 U.S. 104, 109 (1972). “[U]ncertain meanings” lead individuals “to steer far wider of the unlawful zone” and self-censor. *Baggett v. Bullitt*, 377 U.S. 360, 372 (1964).

³ To put a finer point on it, Congress cited two examples where the Foreign Policy Ground might apply: (1) “when an alien’s mere entry into the United States could result in imminent harm to the lives or property of United States persons abroad or to property of the United States government abroad (as occurred with the former Shah of Iran)”; and (2) “when an alien’s entry would violate a treaty or international agreement to which the United States is party.” *Id.* Deportation of a student for her co-authoring an op-ed in a student newspaper is not what Congress had in mind.

It is this very uncertainty that led a federal court to hold the Foreign Policy Ground unconstitutionally vague. See *Massieu v. Reno*, 915 F. Supp. 681, 699-701 (D.N.J. 1996), *rev'd on other grounds*, 91 F.3d 416 (3d Cir. 1996).⁴ The two fatal defects Judge Maryanne Trump Barry identified in *Massieu* are cogent and persuasive here. *First*, and as discussed above, the law contains no “standards” for determining what a noncitizen must do to avoid adverse action since enforcement lies entirely within the Secretary’s personal and undisclosed judgment. *Massieu*, 915 F. Supp. at 699, n.16. *Second*, given that American foreign policy is “unpublished, ever-changing and often highly-confidential,” no noncitizen “could know, ex-ante, how to conform his or her activities to requirements of the law” or when “his or her mere presence here would cause adverse foreign policy consequence.” *Id.* at 700.

These grounds for invalidation are as apt today as they were in 1996. The Foreign Policy Ground, on its face, provides absolutely no notice to noncitizens like Öztürk as to what speech it proscribes. Instead, the statute vests the Secretary of State with seemingly unfettered discretion to take action against any noncitizen lawfully in the U.S. based on whatever constitutionally suspect ground he chooses, including lawful speech the Secretary deems contrary to his nebulous and ever-changing view of “foreign policy.” The First Amendment does not abide laws that invite such sweeping censorship; the statute is void on its face.

⁴ See also *Rafeedie*, 795 F. Supp. 13, where the court held a similar provision of the INA void for vagueness. That provision authorized the Attorney General to detain and deport any noncitizen whom he “knows or has reason to believe seek(s) to enter the United States solely, principally, or incidentally to engage in activities which would be prejudicial to the public interest, or endanger the welfare, safety, or security of the United States,” (*id.* at 15), as an unconstitutionally vague abridgement of freedom of speech because “[t]he undefined terms of the statute—‘activities,’ ‘prejudicial,’ ‘endanger’—are so broad and vague as to deny plaintiff a reasonable opportunity to know what he may or may not say or do.” *Id.* at 23.

IV. CONCLUSION

While many *Amici* may disagree with the substance of Öztürk's statements, they firmly stand behind her right to voice her dissent and will not condone the government's invocation of antisemitism as a pretext for her arrest, detention, and deportation. In our republic founded on the separation of powers, it is the duty of the federal judiciary to defend liberty and protect our most fundamental freedoms whenever the government attempts to undermine them. The Court should exercise its authority to safeguard these freedoms in this case. *Amici* respectfully urge the Court to grant the Petition and Motion for Release

April 10, 2025

Respectfully Submitted,

/s/ Gary L. Franklin, Esq.

Gary L. Franklin
PRIMMER PIPER EGGLESTON & CRAMER PC
30 Main Street, Suite 500
P.O. Box 1489
Burlington, VT 05402
Phone: (802) 864-0880
Fax: (802) 864-0328
Gfranklin@primmer.com

DAVIS WRIGHT TREMAINE LLP
Robert D. Balin (*pro hac vice* forthcoming)
Jeremy A. Chase (*pro hac vice* forthcoming)
Linda Steinman (*pro hac vice* forthcoming)
Victor I. Kovner (*pro hac vice* forthcoming)
Abigail Everdell (*pro hac vice* forthcoming)
Rachel Strom (*pro hac vice* forthcoming)
James Rosenfeld (*pro hac vice* forthcoming)
Jesse Feitel (*pro hac vice* forthcoming)
1251 Ave. of the Americas, 21st Fl.
New York, NY 10020-1104
Phone: (212) 489-8230
Fax: (212) 489-8340
robbalin@dwt.com
jeremychase@dwt.com
lindasteinman@dwt.com
victorkovner@dwt.com

abigaileverdell@dwt.com
rachelstrom@dwt.com
jamesrosenfeld@dwt.com
jessefeitel@dwt.com

DAVIS WRIGHT TREMAINE LLP
Adam S. Sieff (*pro hac vice* forthcoming)
Rachel Goldberg (*pro hac vice* forthcoming)
350 S. Grand Avenue, Suite 2700
Los Angeles, CA 90071-3487
Telephone: (213) 633-6800
Fax: (213) 633-6899
adamsieff@dwt.com
rachelgoldberg@dwt.com

DAVIS WRIGHT TREMAINE LLP
Nathan Siegel (*pro hac vice* forthcoming)
Alison Schary (*pro hac vice* forthcoming)
1301 K Street NW
Washington, DC 20005
Telephone: (202) 973-4200
nathansiegel@dwt.com
alisonschary@dwt.com

Counsel for Proposed Amici

APPENDIX A

Proposed *Amici* consist of the following organizations and congregations:

1. **Anshe Chesed** is a ritually traditional, socially progressive and intellectually vibrant Conservative synagogue in Manhattan. An active, engaged center of Jewish life, the Anshe Chesed community is made up of people both passionate about Torah and tradition and dedicated to building the world through deeds of kindness.

2. **Bend the Arc** is the nation's leading progressive Jewish voice empowering Jewish Americans to fight for justice and equality for all and is the only national Jewish organization focused exclusively on social change in the United States. Bend the Arc mobilizes Jewish Americans beyond religious and institutional boundaries through bold leadership development, innovative civic engagement, and robust advocacy.

3. **B'nai Jeshurun** is a synagogue of nearly 2000 families located on the Upper West Side of New York City but with members around the globe. Since its founding in 1825—when a group of visionary Jewish leaders dared to dream of a community rooted in the revolutionary ideals of religious freedom and inclusion—BJ has grown into a community rooted in deep spirituality and transformative music, bound by love and justice, and committed to a relevant Judaism, shaping the story of American Jewish life.

4. **Boston Workers Circle (“BWC”)** is a 125-year-old progressive Jewish organization focused on Jewish cultural engagement, Yiddish language learning, and social justice activism, serving as a community and spiritual home for secular Jewish life. BWC advocates for social change and celebrates Yiddish, Jewish, and progressive culture through arts, education, and community engagement.

5. **Congregation Beth Elohim** is the largest Reform congregation in Brooklyn and is a welcoming and inclusive synagogue, proudly rooted in Jewish history and identity, embracing of different backgrounds and divergent points of view. With a long tradition of engaging in tikkun olam (repairing the world), they take seriously their Jewish responsibility to care for the stranger, the immigrant, and the most vulnerable, as they know that they themselves have been strangers in many lands throughout their own long history.

6. **Congregation Dorshei Tzedek** is a Reconstructionist community in West Newton, Massachusetts dedicated to creating a caring and inclusive community, and to enhancing Jewish practice and learning in the lives of their members. “Dorshei Tzedek” means “seekers of justice,” and as their name implies, they are seekers of meaningful spirituality, of serious Jewish learning, and of social justice.

7. **Habonim Dror (the Builders of Freedom)**, founded in 1935, is a Progressive Labor Zionist Youth movement whose mission is: (1) To build a personal bond and commitment between North American Jewish youth and the State of Israel, and (2) To create Jewish leaders who will actualize the principles of social justice, equality, peace and coexistence in Israel and North America.

8. **Harvard Jewish Progressive Alumni** was founded in 2019 to advance racial and economic equity at Harvard University. Made up of Jewish alumni across many of Harvard’s schools and across several generations, it affirms its pride in the presence of Jews at Harvard, and it seeks to ensure that the history of anti-Jewish quotas in the Ivy League is not misused to reduce diversity in higher education today.

9. **IKAR** is a community dedicated to reanimating Jewish life and inspired by the moral mandate to build a more just and loving world. They are powered by deep relationships and shared values, intellectual and spiritual curiosity, piety and irreverence, joy, and defiant hope.

10. **J Street** represents Jewish and other Americans who care deeply about the state of Israel and support a diplomatic resolution of Israel's conflicts with its neighbors, the democratic principles on which the United States and Israel were founded and the values of justice, equality and freedom that are central to their identity.

11. **Jewish Alliance for Law and Social Action (JALSA)** is a statewide membership-based non-profit organization based in Boston working for social and economic justice, civil and constitutional rights, and civil liberties for all. Mindful that Jewish history teaches that Jews have thrived most in cultures where freedom of speech is protected and valued, JALSA believes that people of all backgrounds deserve to live in a free society where all are able to speak their minds.

12. **The Jewish Center for Justice** is a leading organization dedicated to social justice, education, and leadership development. Their mission is to empower current and future leaders to create a more just and compassionate society. Rooted in the Jewish commitment to tikkun olam (repairing the world), JCJ advocates and takes action to protect the most vulnerable and advance justice for all.

13. **Jewish Labor Committee (JLC)** was founded in 1934 to rescue Jews and labor unionists from deprivation of their rights and death by the Nazis in Europe. Together with trade union leaders, the JLC continues the fight to protect the rights of Jews and union members wherever those rights are threatened.

14. **Keshet** envisions a world in which all LGBTQ+ Jews and their families can live with full equality, justice, and dignity. By strengthening Jewish communities and equipping Jewish organizations with the skills and knowledge they need to make all LGBTQ+ Jews feel welcome, they work to ensure the full equality of all LGBTQ+ Jews and their families in Jewish life. They create spaces in which all queer Jewish youth feel seen and valued and they advance LGBTQ+ rights nationwide.

15. **Leo Baeck Temple**, founded in 1948, is a prominent Jewish congregation located on the west side of Los Angeles, California.

16. **Ma'yan Tikvah** connects people to Judaism, nature, social justice, and each other through outdoor Jewish experiences and education.

17. **The New England Jewish Labor Committee (NEJLC)**, an affiliate of fellow *amicus* Jewish Labor Committee (JLC), adopts the statement of interest of JLC. The NEJLC is committed to fighting antisemitism while at the same time protecting free speech rights.

18. **New Israel Fund**, headquartered in New York, is the premier engine of Israeli civil society. Founded in 1979, the New Israel Fund is widely credited with its building and today funds a range of not-for-profit organizations that insist on the liberal democratic values enshrined in Israel's Declaration of Independence — organizations that work to ensure human and civil rights, a future that is shared between Jews and Arabs, and equality for all.

19. **New Jewish Narrative** was formed from the merger of Americans for Peace Now and Ameinu. They are committed to shaping a future where values of democracy, equality, and peace guide us all.

20. **New York Jewish Agenda** advocates, organizes, and convenes to promote the values of liberal Jewish New Yorkers to influence state and local policies, politics, and the communal discourse.

21. **The Nexus Project** works with policymakers and community leaders to fight antisemitism, uphold democracy, and protect free speech, recognizing that these tasks are intertwined and interdependent.

22. **T'ruah: The Rabbinic Call for Human Rights** brings the Torah's ideals of human dignity, equality, and justice to life by empowering rabbis and cantors to be the moral voice and to lead Jewish communities in advancing democracy and human rights for all people in the US, Canada, Israel and the occupied Palestinian territories.

23. **Temple Emanu-El** of San Francisco, California, was established in 1850. It is the oldest congregation west of the Mississippi and one of the largest in California.

24. **Temple Micah** is a vibrant and creative Reform congregation of nearly 700 families in Washington, DC. They offer a hopeful, inclusive narrative that gives people a greater sense of coherence, meaning, and possibility about where they have come from as Jews and the journey that they are on together. Together they attempt to answer the question of what it means to live both a fully American and fully Jewish life.

25. **The Reconstructionist Rabbinical Association (RRA)** was established in 1974. The RRA is the professional association of Reconstructionist rabbis. Comprised of over 350 rabbis, the RRA has three primary missions: (1) It serves as a collegial community, in which professional and personal support and resources are provided to rabbis; (2) The RRA represents the rabbinic voice within the Reconstructionist movement, bringing the teachings, stories, and traditions of

Judaism to bear on contemporary issues and challenges, and helping to define Reconstructionist positions on Jewish issues for our time; and (3) The RRA represents the Reconstructionist rabbinate to the larger Jewish and general communities, through participation in programs, commissions, and other activities.

26. **The Workers Circle** is a national secular Jewish social justice organization. They were founded by Eastern European Jewish immigrants fleeing autocracy and persecution and seeking democratic freedoms. That history drives their work for an inclusive democracy and social equality today.

27. **Worcester Havurah** is an independent group of Jews and friends-of-Jews of all ages in and around Worcester, MA—Nipmuc territory. They come together to celebrate, sing, pray, and grapple with Jewish texts and traditions from a diasporic, liberatory framework. They are committed to Jewish ritual decoupled from Zionism, oriented instead around Torah, their relationships to each other, and their local context; this solidarity sustains them in the collective struggle against racism, white supremacy, and capitalism.