THE BORDER AND BEYOND: THE NATIONAL SECURITY IMPLICATIONS OF MIGRATION, REFUGEES, AND ASYLUM UNDER U.S. AND INTERNATIONAL LAW

2017 Symposium Keynote Address Protecting Refugees: A National Security Imperative

Elisa Massimino*

The title of this Symposium is The Border and Beyond. And when we're talking about the national security implications of refugees and migration, that's exactly the right way to think about it. So much of the discussion in our country about immigration and security focuses narrowly on the security of the borders, particularly the southern border, and the potential threats posed by people who seek to come here. But the national security implications of the refugee crisis go way beyond our borders. And from that perspective, I'd like to argue that *protecting* refugees, rather than keeping them out, is a national security imperative.

I've been working in this field for more than 25 years, and during that time there have been many changes in law and policy, a surprising number of them ill-considered and grounded in a fundamental misunderstanding of who refugees are and why they flee. But I don't think I've ever seen refugees — people who are running for their lives from persecution and violence — demonized in the way we are seeing today. The willfully uninformed rhetoric about refugees, culminating most recently in President Trump's executive order suspending the refugee program and banning travelers from several Muslim-majority nations,¹ is dangerous, not just to refugees, but to the rest of us as well.

The so-called "Muslim ban" represents a severe break with American traditions and American ideals and, if permitted to take hold, it will make the United States *more* vulnerable to terrorism and other national security threats. I'll explain why I think protecting refugees is in the clear national security interests of the United States.

First, though, I'd like to provide a bit of historical context. It's important to remember that the growing hostility to refugees predates the Trump presidency. In 2014, when refugees from Central America — including many unaccompanied

^{*} President and Chief Executive Officer of Human Rights First, one of the nation's leading human rights advocacy organizations. This was the keynote address at the Journal of National Security Law and Policy's 2017 symposium, titled *The Border and Beyond: The National Security Implications of Migration, Refugees, and Asylum under US and International Law*, on February 28, 2017. © 2018, Elisa Massimino.

^{1.} Exec. Order No. 13,769, § 5(d), 82 Fed. Reg. 8979 (Jan. 27, 2017).

children — began to cross the southern border in large numbers, intrepid antiimmigration media outlets discovered a "loophole" that they said could allow many unlawful migrants to stay in this country.²

That pernicious "loophole" was something called asylum. Predictably, politicians in Washington picked up this language and started to exploit it.³ I wish I could say that President Obama responded with a grand reaffirmation of America's commitment to refugees. Many of these migrants had, after all, fled horrific violence, including gang murders of children. But instead the Obama administration pursued a policy of so-called "family detention," locking up thousands of women and young children.⁴

Then in 2015, horrific ISIS attacks in Paris sparked a furor in the United States. It didn't matter that those attacks weren't committed by Syrians, or that Syrian refugees are among ISIS's primary victims; thirty American governors proclaimed that their states would be off-limits to Syrian refugees.⁵ And the House passed a bill that would have effectively halted resettlement of refugees from Syria and Iraq.⁶

Fortunately, that bill died in the Senate,⁷ but anti-refugee sentiment persisted. From the rhetoric, you'd have thought that the United States was accepting hundreds of thousands of Syrian refugees. In fact, amid a global refugee crisis that was crying out for American leadership, our government had resettled fewer than two thousand Syrian refugees⁸ — a paltry number given our capacity and the scale of the need. In other words, at a time when the United States should have

7. See Nora Kelly, *Death of a Divisive Refugee Bill*, THE ATLANTIC (Jan. 21, 2016), https://www.theatlantic.com/politics/archive/2016/01/senate-refugee-bill-syria-iraq/425001.

^{2.} Rick Jervis, *Immigrant children continue to surge into South Texas*, USA TODAY (June 17, 2014), https://www.usatoday.com/story/news/nation/2014/06/17/children-surge-immigration-texas/10643609/ ("Some lawmakers, however, argue the youths – and the smuggling rings bringing them in – are exploiting U.S. policy, which allows youngsters from Central American countries other than Mexico to be released to an adult living in the USA while awaiting their court hearing.").

^{3.} See e.g., Congressman: 'At least 10 ISIS fighters' caught trying to cross into US, Fox NEWS (Oct. 8, 2014), http://www.foxnews.com/politics/2014/10/08/congressman-at-least-10-isis-fighters-caught-trying-to-cross-into-us.html.

^{4.} Jennifer M. Chacón, *Immigration and the Bully Pulpit*, 130 HARV. L. REV. F. 243, 253 (2017) ("The Obama Administration therefore pursued policies meting out harsh treatment, including family detention.").

^{5.} Arnie Seipel, *30 Governors Call for Halt to U.S. Resettlement of Syrian Refugees*, NPR (Nov. 17, 2015), https://www.npr.org/2015/11/17/456336432/more-governors-oppose-u-s-resettlement-of-syrian-refugees.

^{6.} American Security Against Foreign Enemies (American SAFE) Act of 2015, H.R. 4038, 114th Cong. (2015).

^{8.} Prior to 2014, there had been fewer than 2000 Syrian refugees admitted. *See* Nicole Ostrand, *The Syrian Refugee Crisis: A Comparison of Responses by Germany, Sweden, the United Kingdom, and the United States*, 3 J. ON MIGRATION & HUM. SEC. 255, 270 (2015) (estimating a total of 1,986 refugees admitted by the United States between fiscal years 2012 and 2014). In 2016, the United States resettled 15,479 Syrian refugee—3,024 were resettled in 2017, and only 11 had been resettled by April 2018. Deborah Amos, *The U.S. Has Accepted Only 11 Syrian Refugees This Year*, NPR (April 12, 2018), https://www.npr.org/sections/parallels/2018/04/12/602022877/the-u-s-has-welcomed-only-11-syrian-refugees-this-year.

been doing much more to help refugees, many in Washington wanted it to abandon even its modest protection goals.

The issue of refugee protection has become entangled in two of the most charged and divisive issues of our time: immigration and terrorism. The result has been a palpable weakening in the bipartisan commitment to protecting refugees. Following the mass displacement and inhumane treatment of refugees after World War II, the world came together to produce the 1951 Refugee Convention.⁹ The United States played a key role in crafting the treaty; the late Louis Henkin, a longtime member of Human Rights First's board, led the U.S. delegation and was one of the chief architects of the treaty.¹⁰ Its purpose was to protect the right to seek and enjoy asylum enshrined in the 1948 Universal Declaration of Human Rights.¹¹

The U.S. commitment to refugees grows out of our history and is a core aspect of our identity. We are, of course, a nation founded by refugees fleeing religious persecution. If we stopped providing protection to the persecuted, the United States would, in a very real sense, stop being the United States. This isn't to say the American record on refugees is unblemished: there have been failures of leadership, and decisions about who is deserving of protection have sometimes been tainted by politics and racism. Nonetheless, the United States has long been a leader in this area based on the strength of a bipartisan consensus that — to put it in modern terms — protecting refugees is part of the American brand. As President Reagan said in his powerful farewell speech, the United States, is "still a beacon, still a magnet for all who must have freedom, for all the pilgrims from all the lost places who are hurtling through the darkness, toward home."¹²

Our asylum and refugee procedures were systematized and codified by the 1980 Refugee Act¹³—a seminal law which, I'm proud to say, Human Rights First played a role in drafting.¹⁴ It codified the definition of a refugee, established a permanent commitment to resettle a certain number of refugees each year, and allowed for flexibility in the case of crises. America's historical commitment to refugees flows from the recognition that refugees are victims in need of protection. They are disproportionately women and children, uprooted by persecution and war: it's hard to think of a more sympathetic population. Undeterred, anti-

^{9.} Convention Relating to the Status of Refugees, Geneva, July 28, 1951, 189 U.N.T.S. 137 (entered into force Apr. 22, 1954).

^{10.} See Agnes Hurwitz, UNHCR mourns death of an architect of the 1951 Refugee Convention, UNHCR (Oct. 19, 2010), http://www.unhcr.org/en-us/news/latest/2010/10/4cbda7506/unhcr-mourns-death-architect-1951-refugee-convention.html.

^{11.} Universal Declaration of Human Rights, Dec. 10, 1848, G.A. Res. 217A, U.N. GAOR, 3d. Sess., 67th plen. mtg., U.N. Doc. A/810 (1948).

^{12.} President Ronald Reagan, Farewell Address to the Nation, 2 PUB. PAPERS 1718, 1722 (Jan. 11. 1989).

^{13.} Refugee Act of 1980, Pub. L. No. 96-212, 94 Stat. 102 (1980).

^{14.} Refugee Protection, HUMAN RIGHTS FIRST, https://www.humanrightsfirst.org/topics/refugee-protection.

refugee politicians and pundits have sought to depict these vulnerable, innocent victims as threats to our security.

President Trump has taken the scapegoating of refugees and Muslims to an entirely new level. His actions recall other shameful instances when the U.S. government discriminated against groups of people in the name of security, from General Grant's expulsion of Jews from three states during the Civil War¹⁵ to the attacks on German-Americans during World War I to the internment of Japanese-Americans during World War II to the Red Scare during the Cold War.^{16,17} Like those predecessors, President Trump is insisting that, to protect ourselves, we must violate human rights. Make a choice — your ideals or your safety. Both, Mr. President. I choose both.

The Trump administration's argument hinges on the claim that the U.S. government cannot effectively screen refugees.¹⁸ But the U.S. government has been doing just that for years. The "extreme vetting"¹⁹ the President seeks is already happening. Of the many millions of foreigners who enter our country every year, refugees are by far the most stringently vetted.²⁰ Screening often takes more than 18 months and includes pre-screening from UNHCR and then multiple interviews and review by professionals at the Department of Homeland Security, intelligence agencies, biometric screenings by the Department of Defense, and cross-checks with information from other governments and from INTERPOL, which maintains extensive information on stolen and lost passports.²¹

Of course, no screening process is infallible. But the idea that the refugee resettlement system poses particular risks is simply not grounded in facts. Meanwhile, the security risks on the other side — of denying protection — are substantial. In fact, the President is doubly wrong here: not only does resettling refugees not weaken national security; it bolsters it.

^{15.} See generally JONATHAN D. SARNA, WHEN GENERAL GRANT EXPELLED THE JEWS (2012).

^{16.} See DAVID M. KENNEDY, OVER HERE: THE FIRST WORLD WAR AND AMERICAN SOCIETY 67-68 (2004) (German-Americans "found themselves the victims of a brainless fury that knew few restraints.").

^{17.} See generally JOHN DAVENPORT, THE INTERNMENT OF JAPANESE AMERICANS DURING WORLD WAR II: DETENTION OF AMERICAN CITIZENS (2010); Colbert I. King, *Donald Trump's anti-Muslim rhetoric echoes the Red Scare era*, WASH. POST (Dec. 11, 2015), https://www.washingtonpost.com/opinions/donald-trumps-new-red-scare/2015/12/11/7abfd80e-9f67-11e5-a3c5-c77f2cc5a43c_story.html?utm_term=.70bfc03e548f.

^{18.} Donald J. Trump (@realDonaldTrump), TWITTER (Sept. 19, 2016, 5:27 AM), https://twitter.com/realdonaldtrump/status/777846568741441536.

^{19.} Donald J. Trump (@realDonaldTrump), TWITTER (Oct. 31, 2017, 6:26 PM), https://twitter.com/ realdonaldtrump/status/925534445393928199?lang=en ("I have just ordered Homeland Security to set up our already Extreme Vetting Program.").

^{20.} See Lori A. Nessel, *Instilling Fear and Regulating Behavior: Immigration Law as Social Control*, 31 GEO. IMMIGR. L.J. 525, 548 (2017)("[S]uspending refugee admission does not advance security since refugees are already the most extensively vetted immigrants.").

^{21.} *See* Margaret Hu, *Crimmigration-Counterterrorism*, 2017 WIS. L. REV. 955, 978-79 (2017) (describing the rigorous refugee screening process).

National security experts agree that terrorist groups cannot defeat the United States and its allies on the battlefield.²² To thrive, they must win the battle of ideas. For many years, terrorist groups have sought to trigger emotional, fear-based responses from the United States that they can use to propagandize against us. There's a very good reason that both President Obama and Senator John McCain have said that American ideals are an asset, not a liability, in the fight against terrorist groups.²³

From a national security perspective, the animus toward Syrian refugees is akin to the U.S. government's fateful decision to use torture after 9-11. The systematic abuse of prisoners was a public relations gift to al Qaeda, which used it to win recruits and sympathizers by depicting the United States as hostile to Islam. A rejectionist approach to the refugee crisis poses a similar threat. In fact, the mean-spirited anti-refugee rhetoric alone does damage. While doing research on the refugee crisis in Turkey and Jordan, our team at Human Rights First discovered that the presidential campaign rhetoric demonizing refugees and immigrants was reverberating on the frontlines of the crisis. The message was causing refugees to give up hope of finding protection in the United States.

I'm not suggesting that anti-refugee rhetoric and actions cause refugees or Muslims generally to run into the waiting arms of ISIS. All but a small fraction of Muslims loathe ISIS.²⁴ But among that small fraction, messaging matters, and we know that ISIS is already exploiting hostility to refugees and other Muslims, using it to validate its clash-of-civilizations narrative.²⁵ A letter to Congress from an esteemed group of former secretaries of state, military leaders, and national security officials made this point well:

Refugees are victims, not perpetrators, of terrorism...Categorically refusing to take them only feeds the narrative of ISIS that there is a war between Islam and the West, that Muslims are not welcome in the United States and Europe, and that the ISIS caliphate is their true home. We must make clear that the United States rejects this worldview by continuing to offer refuge to the world's most vulnerable people, regardless of their religion or nationality.²⁶

^{22.} See, e.g., Gil Avriel, *Terrorism 2.0: The Rise of The Civilitary Battlefield*, 7 HARV. NAT'L SEC. J. 199 (2015); see generally GABRIELLA BLUM AND PHILIP B. HEYMANN, LAWS, OUTLAWS, AND TERRORISTS: LESSONS FROM THE WAR ON TERRORISM (2010).

^{23.} See Ron Fournier, Obama's New American Exceptionalism, THE ATLANTIC (July 28, 2016, 11:24 AM), https://www.theatlantic.com/politics/archive/2016/07/obamas-new-american-exceptionalism/493415; Edward-Isaac Dovere, *McCain, in speech, denounces 'spurious nationalism,*' POLITICO (Oct. 16, 2017, 9:14 PM), https://www.politico.com/story/2017/10/16/john-mccain-nationalism-constitution-243848.

^{24.} See, e.g., Jacob Poushter, In nations with significant Muslim populations, much disdain for ISIS, PEW RESEARCH CENTER (Nov. 17, 2015), http://www.pewresearch.org/fact-tank/2015/11/17/in-nations-with-significant-muslim-populations-much-disdain-for-isis.

^{25.} See, e.g., Adam Taylor, *The Islamic State wants you to hate refugees*, WASH. POST (Nov. 16, 2015), https://www.washingtonpost.com/news/worldviews/wp/2015/11/16/the-islamic-state-wants-you-to-hate-refugees/?utm_term=.1749dedbf205.

^{26.} National Security Leaders Oppose Halting Refugee Resettlement, HUMAN RIGHTS FIRST (Dec. 1, 2015), https://www.humanrightsfirst.org/resource/national-security-leaders-oppose-halting-refugee-resettlement.

But there's an even more direct way that welcoming Syrian refugees would serve America's national security interests. The mass exodus from Syria is a potentially destabilizing force in the Middle East. The countries bordering Syria — including key U.S. allies — have taken in more than 4 million refugees between them.²⁷ It's true that the threat that this influx poses to Jordan, Turkey, and Lebanon can be overstated; these countries are not on the brink of collapse. Even Lebanon — where about 1 in 4 people is a Syrian refugee — remains, for the time being, relatively functioning and stable.²⁸

But over the long term, this could be a serious problem for the region — and for the United States. Syrians could reside in these countries for many more years. We can't even say for certain that they will ever be able to return home. Millions of refugee children are growing up under-educated.²⁹ Eventually this generation is likely to be under-employed. Unable to work legally, many families are marrying off their teenage daughters. If history is a guide — and it usually is — the diaspora population will face restrictions on their rights.

Ambassador Ryan Crocker — who represented the United States in six different countries, including Iraq and Lebanon — has been a leader in making the national security case for welcoming Syrian refugees. In the *Wall Street Journal* recently, he wrote:

Increased assistance would protect the stability of a region home to U.S. allies, including Jordan, NATO's Turkey, and Lebanon, all of which are hosting refugees. The infrastructure — water, sewage, medical care and education — of these states is overwhelmed. A major resettlement and aid initiative can relieve that strain. But left unaddressed, the strain will feed instability and trigger more violence across the region, which will have consequences for U.S. national security.³⁰

As I've mentioned, even before the Trump presidency, the United States was not living up to its role as a leader in refugee protection. Yet last fiscal year, the Obama administration met its goal of resettling 10,000 Syrian refugees.³¹ This was a modest but meaningful accomplishment, one not lost on governments in the Middle East. It helped to restore American credibility on this issue — credibility

^{27.} See Regional Quarterly Dashboard December 2017, UNITED NATIONS HIGH COMMISSIONER FOR REFUGEES, https://data2.unhcr.org/en/documents/details/62550 (last visited Apr. 7, 2018).

^{28.} See, e.g., Lebanon: One in four a refugee, BBC (Dec. 22, 2015), http://www.bbc.com/news/av/world-middle-east-35163273/lebanon-one-in-four-a-refugee.

^{29.} See, e.g., Patricia Mouamar, Syrian Refugees: 'A whole generation is growing up displaced and uneducated,' THE GUARDIAN (Mar. 15, 2015, 5:00 AM), https://www.theguardian.com/global-development/2015/mar/15/syrian-refugees-a-whole-generation-is-growing-up-displaced-and-uneducated.

^{30.} Ryan C. Crocker, *The Case for Accepting Syrian Refugees*, WALL ST. J. (Nov. 17, 2015, 6:35 PM), https://www.wsj.com/articles/the-case-for-accepting-syrian-refugees-1447803302.

^{31.} Haeyoun Park & Rudy Omri, U.S. Reaches Goal of Admitting 10,000 Syrian Refugees. Here's Where They Went, N.Y. TIMES (Aug. 31, 2016), https://www.nytimes.com/interactive/2016/08/30/us/ syrian-refugees-in-the-united-states.html.

that the U.S. government could have leveraged to press other countries to resettle more refugees and provide more assistance to frontline countries.

The Trump approach is doing exactly the opposite. By shutting out refugees, the President is abandoning U.S. allies in the Middle East, letting other countries off the hook, and increasing the chance that the refugee crisis will lead to danger and destabilization in a strategically crucial region of the world.

But that's not all. He's also failing our allies in Europe, with potentially serious implications for U.S. national security. All across Europe today, ultra-right nationalist parties and groups — some of them overtly fascist — have exploited and exacerbated anti-refugee sentiment to gain influence both at the grassroots and in parliament. They're claiming that that E.U. elites are using the refugee crisis to impose their values on ordinary people and the less wealthy nations of Europe.³²

The rise of these far-right groups — along with the power of like-minded politicians such as Hungary's Viktor Orban — poses an existential threat to European democracies, the European Union, and the transatlantic alliance.³³ That's precisely why the Russian government backs many of these groups. If you study Russian propaganda, as my organization has, you'll discover a heavy emphasis on fear-mongering about refugees. State-owned media outlets depict refugees as a threat to the safety and values of Europeans and western governments as unable to protect citizens from these barbaric invaders.

There's an alarming synergy between the anti-refugee rhetoric coming from the White House and that coming from Russia. Let me state it plainly: the liberal international order — which, for all its faults, has helped safeguard relative stability and freedom for decades — is under political attack from Russia and its allies in Europe, and their primary weapon is anxiety about the refugee crisis. By shutting out refugees for supposed security reasons, the White House is bolstering the Russian narrative and undermining U.S. allies in Europe, which need American support as they attempt to manage the crisis and reassure their citizens.

I've discussed three reasons why rejecting refugees weakens U.S. national security: One, it bolsters the clash-of-civilizations narrative of extremist groups. Two, it increases instability in the Middle East. And three, it exacerbates the threat to the EU, the transatlantic alliance, and the liberal order. But there's a fourth reason. It's less tangible but arguably more significant than the other three. And that is the effect on America's global standing, which, in turn, affects its national security.

The ability of the United States to influence events and pursue its interests including its security interests — depends not only on its military and economic power but also on its moral power. When it demonstrates fidelity to its ideals and leads on human rights, the U.S. government is better able to persuade other

^{32.} See Anthony Faiola, New far-right anti-immigrant sentiment hits German streets, WASH. POST (Jan. 24, 2015), https://www.washingtonpost.com/world/europe/new-far-right-anti-immigrant-sentiment-hits-german-streets/2015/01/23/dd23ec5c-a282-11e4-9f89-561284a573f8_story.html?utm_term=.89efa33d08ec.

^{33.} See generally, Patrick Kingsley, *How Viktor Orban Bends Hungarian Society to His Will*, N.Y. TIMES (Mar. 27, 2018), https://www.nytimes.com/2018/03/27/world/europe/viktor-orban-hungary.html.

countries to follow, to build strategic coalitions, to negotiate peace deals and other kinds of agreements, to ease tensions, and to pressure repressive governments to reform.

When it does the opposite, when it defies its ideals and perpetrates abuses, it undermines faith in the global order and empowers tyrants and dictators. It's no coincidence that repressive governments across the world have defended their crackdowns on activists by saying they're fighting a "War on Terror." The human rights abuses committed by repressive governments not only inflict suffering on people; they help produce violent extremism.

The United States cannot lead effectively if it doesn't lead by example. And it can't presume to turn its back on the world one minute, then turn around the next and try to shape events to its liking. I've presented what I hope is a strong pragmatic case for refugee protection. This is important. People are much more likely to support a political position when they believe it to be in their self-interest.

To cite another recent example of this approach, my organization spent a great deal of time and energy debunking the claim that the use of torture strengthened U.S. national security. To that end, we assembled a coalition of retired generals and admirals, who knew firsthand that torture made Americans less safe by, for example, eliciting bogus information, alienating allies, and playing into the propaganda of extremism groups.³⁴ That military coalition played a key role in changing the political debate — and U.S. policy — on torture. We aim to play a similar role in the debate over refugees. That's why we're teaming up with veterans and other national security authorities to argue that President Trump's assertion that blocking refugees protects the United States simply isn't grounded in facts.

We need to remember, however, that in politics — especially politics in 2017 — facts aren't everything. Say what you will about President Trump, on this issue—as on most issues—he speaks to people's emotions, particularly fear. But fear is a noto-riously bad advisor. Unfortunately, it can be effective. Indeed, support for his so-called Muslim ban is based on fear and prejudice and not much else. So we have to respond in kind, not with fear but with hope, not with prejudice, but with an inclusive vision of our country. We need to speak to hearts as well as heads and remind people in a visceral way what America stands for.

"Give me your tired, your poor, your huddled masses yearning to breathe free."³⁵ No less than the Declaration of Independence's "self-evident" truths or the first line of the Gettysburg Address, these words on the Statue of Liberty convey core American ideals.³⁶ They express who we want to be, who we're supposed to be, and — at our best — who we are. To fight for the rights of refugees in the context of the American story, we're teaming up with military veterans

^{34.} Statement of National Security, Intelligence, and Interrogation Professionals, HUMAN RIGHTS FIRST (Oct. 1, 2014), https://www.humanrightsfirst.org/resource/statement-national-security-intelligence-and-interrogation-professionals.

^{35.} Emma Lazarus, *The New Colossus*, POETRY FOUND., https://www.poetryfoundation.org/poems/ 46550/the-new-colossus.

^{36.} VETS FOR AMERICAN IDEALS, https://www.vfai.org.

from across the country. They're part of a new initiative at Human Rights First called Veterans for American Ideals. We started this group last year, and the response has been overwhelming. Thousands of veterans have now joined us to stand up for refugees and against the anti-Muslim bigotry that undermines American security.

While people join the military for a variety of reasons, many are motivated by idealism — by a desire to uphold the ideals of our country. And as we've learned, a great number want to keep serving their country after they take off the uniform. They feel that, in advocating for the rights of refugees and against anti-Muslim sentiment, they're fighting for the same ideals they fought for overseas.

These vets have been engaged in the debate over the Special Immigrant Visa program for Afghans. This program is a lifeline for people under threat from the Taliban because of their association with the U.S. military. Protecting them is just basic decency. These people worked alongside our troops, often at great personal risk to them and their families. We promised that we would protect them. Yet last year, the visa program came under political attack – ostensibly for budgetary reasons, but surely the anti-refugee mood was a factor. Veterans for American Ideals fought for the program and helped to preserve it.³⁷

Now these vets are speaking out against the Trump administration's clampdown on refugees.³⁸ And who better to make the case? Not only do they embody national security and neutralize the "soft on terrorism" charge, they also speak passionately about the ideals that they fought to protect and that they want their government to reflect. They believe, as I do, that most Americans want our country to remain a beacon of hope and a safe haven. And that in the end, if we are united and resist appeals to prejudice and fear, our vision of hope rooted in history will prevail.

^{37.} Letter from Veterans for American Ideals to Congress, HUMAN RIGHTS FIRST (Sept. 16, 2016), http://www.humanrightsfirst.org/sites/default/files/Vet-Letter-Congress-Sep-16.pdf.

^{38.} VFAI Statement on President Trump's Executive Order on Refugees, VETS FOR AMERICAN IDEALS (Mar. 6, 2017), https://www.vfai.org/blog/vfai-statement-president-trumps-revised-executive-order-refugees.
