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7 **UNITED STATES DISTRICT COURT**  
8 **WESTERN DISTRICT OF WASHINGTON**

9 STATE OF WASHINGTON, et al.,

NO. 18-cv-00939

10 Plaintiff,

DECLARATION OF  
EMARY C. ARONSON

11 v.

12 DONALD TRUMP in his official capacity  
as President of the United States, et al.,

13 Defendants.  
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I, Emary C. Aronson, declare as follows:

15 1. I am over the age of eighteen and have personal knowledge of all the facts  
16 stated herein.

17 2. I am Chief Program Officer for Robin Hood. I oversee Robin Hood's grant-  
18 making efforts to support nonprofit and social services in New York City. I have been  
19 employed by Robin Hood since 1999.

20 3. Robin Hood is one of New York City's largest poverty-fighting organizations.  
21 Since its founding in 1988, Robin Hood has raised more than \$2.5 billion in dollars, goods and  
22 services to provide for hundreds of the most effective early childhood development programs,  
23 schools, legal services nonprofits, healthcare clinics, homeless shelters and other vital services  
24 in our city. Robin Hood's mission is to ensure that New York's neediest children and families  
25 have the tools they need to build better lives. Our work is based on a rigorous set of metrics  
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1 that measures the relationship between the cost of an intervention and the economic and social  
2 benefits it produces for the individual being served.

3 4. Consistent with our mission is the belief that **all children** present in New York  
4 City, regardless of nativity or immigration status, have the right to safety, to grow up in a  
5 nurturing environment with their parent or guardian, to be educated, to enjoy their childhood,  
6 and to receive due process in immigration proceedings.

7 5. Robin Hood invests more than \$30 million annually to support programs that  
8 promote early childhood development, including initiatives focused on the crucial first 1,000  
9 days of life. More than 50 years of research demonstrates that the lack of nurturing care from a  
10 parent or committed caregiver, social interaction, appropriate stimulation, and psychological  
11 comfort lead to a number of deleterious impacts that have lifelong consequences for  
12 children<sup>1,2</sup>. These include serious impairments to healthy development leading to cognitive  
13 delays and emotional dysregulation. Moreover, adverse childhood experiences, including even  
14 the brief separation of children from their parents, are directly correlated with increased risk of  
15 depression, suicidality, long-term physical health problems, substance abuse disorders, and  
16 other social ills<sup>3</sup>.

17 6. Robin Hood also invests more than \$5 million annually in programs that  
18 provide immigration legal services. In 2013, we launched Immigrant Justice Corps, the  
19 country's first legal fellowship program focused on immigration services. That program has  
20 now served more than 40,000 immigrants in four states. In 2014, we also helped establish the  
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22 <sup>1</sup> National Scientific Council on the Developing Child. (2012). *The Science of Neglect: The Persistent*  
23 *Absence of Responsive Care Disrupts the Developing Brain: Working Paper 12.*  
<http://www.developingchild.harvard.edu>

24 <sup>2</sup> Nelson, C.A, Fox, N.A., & Zeanah, C.H. (2014). *Romania's Abandoned Children*. Cambridge, MA:  
Harvard University Press.

25 <sup>3</sup> Felitti, V.J., et al. (1998). Relationship of childhood abuse and household dysfunction to many of the  
26 leading causes of death in adults. The Adverse Childhood Experiences (ACE) Study. *American Journal of Preventative Medicine*, 14(4), 245-258.

1 ICARE Coalition, which has provided legal counsel to nearly 1,500 Central American  
2 unaccompanied minors in New York City. We make these investments because attaining legal  
3 status provides a long-term pathway out of poverty for immigrants in our city. Data from the  
4 Transactional Records Access Clearinghouse at Syracuse University demonstrate that legal  
5 representation in immigration proceedings increases the probability of a grant of legal status by  
6 at least 400 percent. However, the federal government does not appoint counsel in  
7 immigration proceedings, thereby endangering immigrant children's right to due process,  
8 diminishing the likelihood they will attain legal status and permanent work authorization, and  
9 constraining their ability to contribute to our society and our economy into adulthood.

10 7. Robin Hood funds more than 200 nonprofit organizations every year. Through  
11 our work, we have an intimate knowledge of the impact that shifts in federal policy can have  
12 on local nonprofit operations. Without clear planning, communications, and transparent data  
13 sharing in the implementation of new policies at the federal level, local social services are  
14 severely disrupted. Nonprofit executives, attorneys, social workers and clinicians can be  
15 pulled away from serving their regular clients to coordinate and respond to emergency needs.

16 8. We have learned that at least 300 children who were forcibly separated from  
17 their parents are currently in New York City as a result of the "zero-tolerance policy." We  
18 have been in contact with more than two dozen agencies involved in mounting a local  
19 emergency response to the situation. This outreach has included federal officials, state and  
20 local government agencies, foster care agencies caring for these children, nonprofit legal  
21 services providers, experts on the health and mental health of young children, and national and  
22 local philanthropic organizations.

23 9. We know that organizations in New York City involved in this effort are  
24 operating at the highest levels of professionalism and care for these vulnerable children.  
25 However, the current situation resulting from the "zero-tolerance policy" has demanded a far  
26 greater volume and type of service than historically they have been funded to provide. We

1 have learned that these children, in being separated from their parents, have experienced severe  
2 trauma, compounded as they have faced difficulty in contacting or being reunited with their  
3 parents or caregivers. Nonprofit legal services providers do not have sufficient staffing or  
4 space to provide counsel to all those in need and are having to quickly gain new expertise to be  
5 able to serve children who are pre-verbal. Translation services are also lacking, particularly for  
6 those who children speak indigenous Central American languages. Immigrant children are  
7 now spending twice as long in foster care as they have historically, as potential sponsor  
8 families are reluctant to come forward due to increased immigration enforcement activities  
9 nationwide. As a result, local governments and philanthropic institutions will likely need to  
10 divert millions of dollars to ensure an effective and humane response to the situation on the  
11 ground.

12 10. We firmly believe that preserving the rights of asylum seekers, including young  
13 children, as already enshrined in our laws, is vital to the fair administration of justice, to the  
14 alleviation of poverty, and to our country's economic prosperity.

15 11. The "zero-tolerance policy" instituted at our border, which directly led to the  
16 separation of children and parents, has caused irreparable social and emotional trauma to the  
17 hundreds of children now in our city as well as to their families detained across the country.  
18 This is not a political issue. This policy has denied them and their families their fundamental  
19 right to due process, overburdened local nonprofit services providers, and increased the  
20 likelihood that these vulnerable children will live their lives in poverty.  
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2 I declare under penalty of perjury under the laws of the State of Washington and the  
3 United States of America that the foregoing is true and correct.  
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5 DATED this 29th day of June, 2018 at New York, New York.  
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9 Emary C. Aronson  
10 Chief Program Officer  
11 Robin Hood  
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