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EXHIBIT A

CAUSE NO: _____

**KEN PAXTON, in his official capacity
as Texas Attorney General and
THE STATE OF TEXAS**

Plaintiffs,

v.

FIEL HOUSTON, INC.

Defendant.

IN THE DISTRICT COURT

HARRIS COUNTY, TEXAS

JUDICIAL DISTRICT

**THE OFFICE OF THE ATTORNEY GENERAL AND THE STATE OF TEXAS'
APPLICATION FOR TEMPORARY INJUNCTION AND [PROPOSED] PETITION
IN THE NATURE OF QUO WARRANTO**

The Office of the Attorney General (“OAG”) and the State of Texas (collectively, the “State”) file this Application for Temporary Injunction and [Proposed] Petition in the Nature of Quo Warranto (“Quo Warranto Petition”). The State’s Quo Warranto Petition seeks an order terminating and revoking Defendant FIEL Houston, Inc.’s (“FIEL”) registration and certificate of formation to do business in Texas. *See* Tex. Gov’t Code § 402.023; Tex. Civ. Prac. & Rem. Code §§ 66.001 *et seq.* And the Application for Temporary Injunction seeks an immediate injunction halting FIEL’s operations *in toto*. In support hereof, the State would show as follows:

I. PRELIMINARY STATEMENT

Corporations organized under the federal Internal Revenue Code as 501(c)(3) organizations enjoy significant benefits. *See* 26 U.S.C. § 501(c)(3). At the federal level, they enjoy exemption from federal income tax. And at the State level, they enjoy significant benefits under State tax law, including an exemption from taxation on real and personal property, Tex. Tax Code § 11.18, franchise taxes, *Id.* at § 171.063, and sales and use taxes, *Id.* at § 151.310. 501(c)(3) status, however, comes with a tradeoff. Namely, to obtain these significant benefits, 501(c)(3)

organizations must be “operated exclusively for” one of an enumerated set of purposes, such as “charitable” purposes or “for the prevention of cruelty to children or animals.” 26 U.S.C. § 501(c)(3). In addition, they must not “participate in, or intervene in (including the publishing or distributing of statements), **any** political campaign” *Id.* and they must not engage in “carrying on propaganda, or otherwise attempt[] to influence legislation.” *Id.*

Defendant FIEL openly flouts these rules. It has engaged in electioneering, such as by depicting Donald Trump as the “Son of the Devil” in the heart of the election season. Its website prominently features material supporting Joe Biden. And, although FIEL generally supports Joe Biden and his agenda, it paradoxically has widely announced that if he does “not deliver on [his] campaign promises, we will deliver — [his] exit ticket out of the White House.” Moreover, its social media is littered with material that openly attempts to defeat Texas legislation, and carries on propaganda. FIEL obsessively campaigns against Texas legislation, and boosts federal legislation and related Executive actions. In short, FIEL systemically violates the 501(c)(3) rules.

It is well-settled that the 501(c)(3) “exemptions are justified on the basis that the exempt entity confers a **public** benefit.” *Bob Jones Univ. v. United States*, 461 U.S. 574, 591 (1983) (emphasis added). But here, Defendant FIEL instead seeks to confer a political benefit to its preferred candidates and topics. The State embraces the First Amendment’s value that Americans generally should have their voices heard on all types of political matters and campaign vigorously in support of one candidate or another. But it has **long** been the law that entities cannot enjoy 501(c)(3) status while doing so. *Regan v. Taxation With Representation of Wa.*, 461 U.S. 540, 550 (1983). The First Amendment protections that might otherwise apply simply have no bearing on whether an entity is complying with its Section 501(c)(3) commitments and, by extension, their

commitments to the State of Texas set forth in their corporate charters. Organizations remain “free to argue [their] position vigorously to the Congress, to the President and to the American public.”

Fund for the Study of Econ. Growth v. IRS, 161 F.3d 755, 760 (D.C. Cir. 1998). And they are free to insult elected officials. But “as the Supreme Court has noted, controversies such as these must be conducted without public subvention” that Section 501(c)(3) status confers. *Id.*

The Office of the Attorney General has authority to enforce against this abuse of Section 501(c)(3) status. When FIEL registered as a corporation with the State of Texas, it filed a certificate of formation avowing that it would operate strictly “within the meaning of Section 501(c)(3) of the [federal] Internal Revenue Code . . . and the Texas Tax Code, Section 11.18.” It is black-letter-law that corporations have no right to “exercise a power in a manner inconsistent with a limitation on the purposes of powers of the entity contained in its governing documents.” Tex. Bus. Orgs. Code § 2.113. And the State may enforce whenever a corporation is “engaged in acts of conduct in violation of” its “governing documents.” *Id.* at § 12.153; *see also* Tex. Gov’t Code § 402.023.

For the reasons set forth below, the Court should immediately issue a temporary injunction enjoining FIEL’s operations. And, after an opportunity for consideration on the merits, the Court should revoke and terminate FIEL’s corporate registration and certificate of formation, dissolve its existence, enter a permanent injunction prohibiting FIEL from transacting business in this State, and appoint a receiver to wind-up its affairs.

II. DISCOVERY CONTROL PLAN

1. Discovery is intended to be conducted under Level 2 of Rule 190 of the Texas Rules of Civil Procedure.

III. THE PARTIES

2. Plaintiff, Ken Paxton, is the elected Attorney General of the State of Texas. The Office of the Attorney General has offices located at 300 W. 15th Street, Austin, Texas 78701.

3. Plaintiff, the State of Texas, is a state of the United States of America and a sovereign entity that “has an intrinsic right to enact, interpret, and enforce its own laws.”¹

4. Defendant FIEL Houston, Inc. is a non-profit corporation organized under the laws of the State of Texas. Its registered agent is Cesar Espinosa, who may be served at 7642 Shavano Ln., Cypress, Texas 77433.

IV. STATEMENT OF RELIEF

5. Pursuant to Rule 47(c) of the Texas Rules of Civil Procedure, the State seeks monetary relief of \$250,000 or less and non-monetary relief.

V. THE ATTORNEY GENERAL’S ENFORCEMENT AUTHORITY

6. OAG has broad authority to “investigate the organization, conduct, and management of a filing entity or foreign filing entity to determine if the entity has . . . engaged in acts or conduct in violation of” its “governing documents” or any “law of [Texas].” Tex. Bus. Orgs. Code § 12.153; *accord* Tex. Const. art. IV, §22.

7. In addition, it is well-established that the Attorney General can terminate a corporation’s right to do business in Texas when “sufficient cause exists.” Tex. Gov’t Code § 402.023. Indeed, “the Attorney General is authorized and required by [both the Constitution and statute] to take such action in the Courts as may be proper and necessary to prevent any private

¹ State v. Naylor, 466 S.W.3d 783, 790 (Tex. 2015)

corporation from exercising any power . . . not authorized by law.” *Day v. State*, 489 S.W.2d 368, 372 (Tex.App.—Austin 1972).

8. Sufficient cause may exist in a host of situations involving legal violations. *See, e.g., Humble Oil & Refining v. Daniel*, 259 S.W.2d 580, 589-90 (Tex. App.—Beaumont 1953), *writ refused n.r.e.* (Tex. 1953), *cert. denied*, 347 U.S. 936 (1954).; *Chesterfield Fin. Co. v. Wilson*, 328 S.W.2d 479, 482 (Tex. App—Eastland 1959); *State v. Sw. Bell Tel. Co.*, 526 S.W.2d 526, 531 (Tex. 1975). In addition, sufficient cause exists as a matter of law when a corporation exercises a power not granted in its governing documents. *See Tex. Bus. Orgs. Code §§ 2.113, 12.153; accord Washington Am. Life Ins. V. State*, 545 S.W.2d 291, 294 (Tex. App.—Austin 1977) (sufficient cause existed where company “was not licensed to conduct” business it was operating in Texas).

9. The State’s authority to terminate a corporation for exercising powers not granted by its governing documents or law reflects the longstanding principle that an entity’s right “to exist as a corporation, and its authority, in that capacity, to conduct the particular business for which it was created, [is] granted, subject to the condition that the privileges and franchises conferred upon it should not be abused, or so employed as to defeat the ends for which [the corporation] was established, and that, when so abused or misemployed, they may be withdrawn or reclaimed by the state.” *Chicago Life Ins. Co. v. Needles*, 113 U.S. 574, 480 (1885).

VI. SECTION 501(C)(3) BACKGROUND & REQUIREMENTS

10. 26 U.S.C. § 501 states that organizations that fall under subsection (c) shall be exempt from federal taxation under the subtitle. Among the categories of corporations that fall within subsection (c) include those “organized and operated exclusively for religious, charitable, scientific, testing for public safety, literary or educational purposes.” 28 U.S.C. § 501(c)(3).

11. Texas Tax Code § 11.18(a) states that charitable organizations that qualify are exempt from taxation on buildings and tangible personal property that it owns. To qualify as a “charitable organization” for purposes of this section, the organization must be “organized exclusively to perform religious, charitable, scientific, literary, or educational purposes” and, except for a few exceptions not relevant here, perform one or more activities specified in a laundry list of charitable functions. Tex. Tax Code § 11.18(d).

12. Federal regulations also implement the 501(c)(3) requirements. “In order to be exempt as an organization described in section 501(c)(3), an organization must be both [1] **organized** and [2] **operated** exclusively for one or more of the purposes specified in [Section 501(c)(3)].” 26 C.F.R. § 1.501(c)(3)-1 (emphasis added). “If an organization fails to meet either the organizational test or the operational test, it is not exempt.” *Id.* The present action concerns how FIEL is operated; therefore, the legal background provided below focuses on that aspect of the 501(c)(3) requirements.

13. Generally speaking, in determining whether an organization complies with the 501(c)(3) rules, a court must consider “the actual objects motivating the organization and the subsequent conduct of the organization.” *Taxation With Representation v. United States*, 585 F.2d 1219, 1222 (4th Cir. 1978).

14. The presence of a single substantial purpose that is not described in Section 501(c)(3) will defeat 501(c)(3) treatment. *Better Bus. Bureau v. United States*, 326 U.S. 279, 283 (1945).

15. An organization is disqualified from 501(c)(3) status if it substantially “[c]ontacts, or urges the public to contact, members of a legislative body for the purpose of proposing,

supporting, or opposing legislation” or otherwise “[a]dvocates the adoption or rejection of legislation.” 26 C.F.R. § 1.501(c)(3)-1. Legislation is defined to include both federal and state legislation. *Id.*

16. An organization is also disqualified from 501(c)(3) status if it engages in “[a]ctivities [that] constitute participation or intervention in a political campaign on behalf of or in opposition to a candidate,” which “include, but are not limited to, the publication or distribution of written or printed statements or the making of oral statements on behalf of or in opposition to . . . a candidate.” 26 C.F.R. § 1.501(c)(3)-1.

VII. FACTUAL BACKGROUND

17. On January 21, 2011, FIEL filed its Certificate of Formation of a Nonprofit Corporation with the Secretary of State of Texas. Hanlan Aff., Ex. A. The Certificate states that FIEL “is organized for charitable, religious, scientific, literary, or educational purposes” and, “[i]n particular[,] the Corporation shall offer educational forums, workshops, sessions and other activities focusing on immigration and education as it affects immigrant families and youth struggling with these issues.” *Id.*

18. FIEL’s website represents that the nonprofit corporation advocates on behalf of immigrants and their families for access to social justice, education, and laws benefitting these communities.

19. In a remarkable number of respects, however, FIEL has openly flouted the 501(c)(3) requirements and, thus, its governing corporate documents. As shown below, its public conduct indicates that it is not shy about that fact.

FIEL’s Direct and Indirect Campaigning against Then-Candidate Donald Trump

20. In 2016, then-candidate Donald Trump made the rescission of President Barack Obama’s “Deferred Action for Childhood Arrivals” (DACA) program a signature issue in his presidential campaign.² FIEL, however, made numerous public statements and issued documents encouraging people to vote *against* Trump, including for this very reason.

21. For example, in a September 20, 2016, post on FIEL’s Facebook account, the organization encouraged its supporters to “VotaPorDACA” (Vote for DACA) on election day, November 8, 2016. *See* Hanlan Aff., Ex. B (authenticating a true and correct copy of that post, as shown immediately below).



² See, e.g., <https://www.pbs.org/newshour/politics/donald-trumps-10-point-immigration-plan>.

22. DACA, however, was not on any ballot. Instead, the most reasonable interpretation of this post was as a statement in opposition to candidate Trump and to vote against him on November 8, in favor of voting for candidates who supported DACA.

23. FIEL's subsequent communications in the 2016 election cycle confirm that indeed FIEL was messaging to supporters that they should oppose candidate Trump.

24. For example, a September 24, 2016, Facebook post with the hashtag "#VOTEFORDACA" shows an image of what appears to be FIEL's office, with a blow-up sized doll of Donald Trump with duct tape over his mouth. Hanlan Aff., Ex. C.

25. Less than one month later, on October 9, 2016, a FIEL Facebook post depicts a life-sized image of Donald Trump with horns, accompanied by the statement, “El Hijo Del Diablo” (The Son of the Devil). Hanlan Aff., Ex. D (authenticating a true and correct copy of that post, as shown immediately below).



26. Many of FIEL's other Facebook posts leading up to the 2016 election likewise encourage readers to Vote for DACA. Hanlan Aff., Exs. E-G.

FIEL’s Express Advocacy Against Texas Legislation in 2017

27. In 2017, the Texas Legislature considered—and ultimately enacted—“SB-4,” a law designed to require local governmental entities to comply with federal authorities regarding immigration related offenses (“2017 SB-4”).

28. FIEL, however, engaged in a blizzard of advocacy throughout 2017 for purposes of encouraging people to oppose 2017 SB-4 and otherwise attempting to influence that legislation.

29. For example, on April 28, 2017, FIEL made a Facebook post stating, “Unidos, Podemos retar la #SB4 en las cortes y en las calles.” (United, we can challenge #SB4 on the courts and on the streets). Hanlan Aff., Ex. H.

30. On April 30, 2017, FIEL posted on Facebook notifying users and the general public of a television news story “sobre la marcha en contra de la deportaciones y la ley” (about the march against deportation and the law). Hanlan Aff., Ex. I.

31. On April 26, 2017, FIEL publicly posted pictures featuring individuals carrying signs reading “SB4 IS RACIST,” “LONGHORNS AGAINST SB4,” and “SB4 not 4 The PEOPLE.” Hanlan Aff., Ex. I.

32. On March 20, 2017, FIEL publicly posted a picture of individuals holding signs with dashes through “SB4,” reading “#STOPSB4” and “#JOINFIEL.” Hanlan Aff., Ex. K.

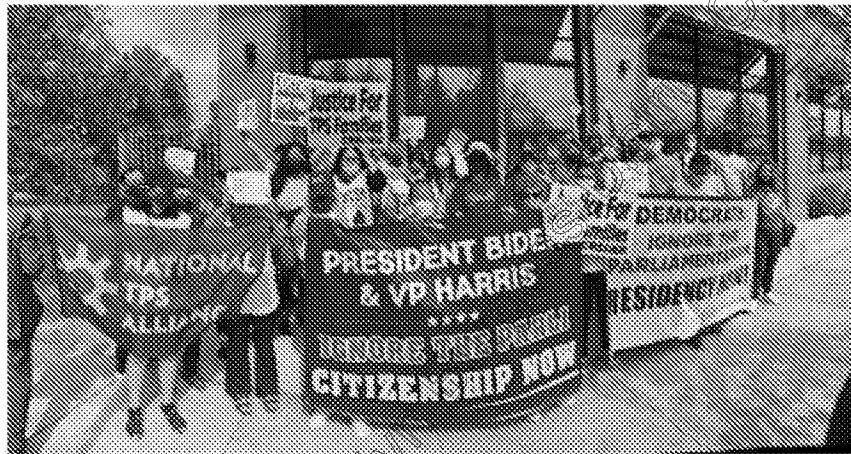
33. On that same day, FIEL posted on Twitter (now known as X.com), encouraging users to “March against #SB4.” Hanlan Aff., Ex. L.

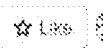
FIEL’s Advocacy and Support for President Biden

34. More recently, FIEL has boasted public support for President Biden and encouragement for his key signature initiatives.

35. For example, FIEL’s website prominently depicts its members holding a massive banner regarding President Biden & VP Harris. Hanlan Aff., Ex. M (authenticating true and correct copy of the relevant portion of FIEL’s website, as depicted immediately below).

We are always working to push for immigration reform. Please refer back to our page for updates.



 1 like  2 likes

36. Public reporting shows that FIEL openly attends political rallies where it uses bullhorns to engage in “shouting matches” with Trump supporters. Hanlan Aff., Ex. N

37. In addition, FIEL uses social media to tout President Biden’s signature legal moves regarding immigration and the border. Hanlan Aff., Ex O.

38. Paradoxically, however, FIEL on occasion expressly electioneers *against President Biden* when it feels President Biden is not doing enough to advance his own agenda.

39. For example, FIEL has organized rallies to “push President Joe Biden’s administration to start creating Comprehensive Immigration Reform that can be passed.” Hanlan Aff., Ex. P.

40. At those rallies, FIEL’s leadership stated, “To the Biden administration, I say this, ‘Enough is enough. You have the power. If you do not deliver on your campaign promises, we will deliver — your exit ticket out of the White House.’” Hanlan Aff., Ex. Q.

FIEL’s Express Advocacy Against Texas Legislation in 2023 and 2024

41. FIEL has also very publicly engaged in express advocacy regarding recent Texas legislation.

42. In particular, in 2023 the Texas Legislature passed and Governor Abbott signed—another law known as “SB-4” regarding alien activity in Texas (2023 SB-4).

43. FIEL issued a signing statement in the wake of 2023 SB-4, publicly stating that Governor Abbott had signed the law “because of personal political ambition, greed and hate.” The signing statement further told its supporters that Governor’s Abbott’s actions reflected an “attack the immigrant community to fortify himself and his base.” Hanlan Aff., Ex. R.

44. FIEL's social media is also littered with advocacy against SB-4. For example, the banner of its Facebook page is a picture of what appears to be its members holding a massive sign stating "NO SB4" and shouting into bullhorns at a public rally. Hanlan Aff., Ex. S (authenticating true and correct copy of the relevant picture, depicted immediately below).



45. FIEL's Instagram also contains numerous images and posts to the same effect. *See* Hanlan Aff., Ex T (providing true and correct copies of the relevant images and posts from Instagram, as depicted immediately below).



46. And FIEL's X.com page also contains numerous images and posts emphasizing the group's advocacy against SB-4. Hanlan Aff., Ex. U (providing true and correct copies of the relevant images and posts from X.com, as depicted immediately below).



47. Indeed, for the past several months, FIEL's social media presence indicates that the organization does little *other* than advocate regarding SB-4. For example, on February 28, 2024, FIEL quoted one of its members and posted an accompanying news article, stating “We're not going to stand by idly”: Houston immigrant rights groups prepare for SB4”. Hanlan Aff., Ex. V. The very next day, FIEL posted, “BREAKING NEWS: A federal judge blocks SB4 from taking effect on March 5th #laluchasigue” (#thefightcontinues). Hanlan Aff., Ex. W. On March 19, 2024,

FIEL posted, “Breaking news on #SB4 the Supreme Court went back on the decision issued yesterday dealing a terrible blow to our community #PREPARE #RESIST”. Hanlan Aff., Ex. X.

Other Political Activity

48. FIEL also engages in other various activities that openly contradict its 501(c)(3) status. For example, on or around May 3, 2023, FIEL’s executive director interrupted Governor Abbott’s remarks on parental empowerment, proclaiming “You’re a traitor. You gotta go. You call people illegal, and they’re not. Gov. Abbott, get out!” Hanlan Aff. Ex. Y.

49. And on April 25, 2024, FIEL posted on X.com that “Abbott is a violent racist Fascist man. We stand with the student organizers! #freepalestine.” Hanlan Aff., Ex. Z.

50. On May 2, 2023, FIEL posted on Facebook in response to an announcement by Governor Abbott, stating “Shame on you @GregAbbott_TX”. Hanlan Aff., Ex. AA.

51. On June 23, 2023, FIEL posted a video on Facebook featuring its executive director in a shirt with text on it saying “Arrest Trump Not Migrants.” Hanlan Aff., Ex. BB.

52. On July 18, 2023, FIEL posted a on Facebook, publicly stating “Governor Abbott, You can’t hypocritically be ‘pro-life’ and at the same time purposely put immigrant lives (including children) in danger #immigrantlivesmatter.” Hanlan Aff., Ex. CC.

VIII. BRIEF SUPPORTING APPLICATION FOR TEMPORARY INJUNCTION

FIEL’s ongoing operations must be enjoined pending resolution on the merits of the State’s quo warranto claim. A court must grant a temporary injunction where the applicant proves: (1) the existence of a cause of action against the adverse party; (2) a probable right to the relief sought; and (3) a probable, imminent, and irreparable injury in the interim if the sought-after injunction is not awarded. *Butnaru v. Ford Motor Co.*, 84 S.W.3d 198, 204 (Tex. 2002). The State satisfies all

of the prerequisites here; therefore, the Court should enjoin FIEL’s ongoing operations until resolution the State’s petition on the merits.

No question exists that the State has a cause of action in the present case. Indeed, “[t]he [State] would be impotent to enforce its own laws if it could not temporarily enjoin those breaking them pending trial.” *State v. Hollins*, 620 S.W.3d 400, 410 (Tex. 2020). The State has an “intrinsic right to enact, interpret, and enforce its own laws.,” *State v. Naylor*, 466 S.W.3d 783, 790 (Tex. 2015), which includes the right to “enforce existing policy” as adopted by the Texas Legislature, *City of El Paso v. Heinrich*, 284 S.W.3d 366, 372 (Tex. 2009). Injuries inflicted to this right are sufficient to create standing to sue and demonstrate irreparable harm. *Valentine v. Collier*, 956 F.3d 797, 803 (5th Cir. 2020); *Texas v. EEOC*, 933 F.3d 433, 447 (5th Cir. 2019); *Texas Ass’n of Bus. v. City of Austin*, 565 S.W.3d 425, 441 (Tex. App.—Austin 2018, pet. denied). Simply put, the State is “the guardian and protector of all public rights” and has authority to sue to redress any violations of those rights, *Yett v. Cook*, 281 S.W. 837, 842 (Tex. 1926), including through quo warranto proceedings.

In addition, the State has more than ample proof to show at this stage of the proceedings that injunction it has a “probable right” to the relief sought. As shown in the petition, the State’s evidence will readily establish that FIEL violated the law by exercising powers not granted in its governing documents.

A non-profit corporation organized under the laws of this State “may not [] engage in a business or activity that [] is expressly unlawful or prohibited by a law of this state.” Tex. Bus. Orgs. Code § 2.003; *see also id.* at § 22.051. Corporations have no right to “exercise a power in a manner inconsistent with a limitation on the purposes of powers of the entity contained in its

governing documents.” *Id.* at § 2.113. And the State may enforce whenever a corporation is “engaged in acts of conduct in violation of” its “governing documents.” *Id.* at § 12.153.

Under the Constitution and by law, when a corporation acts unlawfully, the Attorney General “*shall*” (1) act to prevent continuation of the conduct, and (2) seek judicial forfeiture of the corporation’s charter. Tex. Gov’t Code § 402.023 (emphasis added); Tex. Const. art. IV, § 22. Further, an injunction is a proper vehicle to prevent a corporation’s ongoing violations of law. *Chesterfield Fin. Co. v. Wilson*, 328 S.W.2d 479, 482 (Tex. App—Eastland 1959); *State v. Sw. Bell Tel. Co.*, 526 S.W.2d 526, 531 (Tex. 1975).

FIEL has violated the 501(c)(3) rules and, therefore, its governing documents in at least two respects.

First, FIEL makes “publication or distribution of written or printed statements or the making of oral statements on behalf of or in opposition to . . . a candidate” in plain violation of the 501(c)(3) rules. 26 C.F.R. § 1.501(c)(3)-1(c)(3)(iii). It does not even pretend to hide this fact; it has openly used its social media and made public statements to campaign against candidate Trump, *supra* ¶¶ 24 – 25, and aggressively target Governor Abbott, *supra* ¶¶ 43, 48 – 49, 50; 52. Moreover, while FIEL generally appears to support President Biden, it has boasted that it will “deliver [his] exit ticket out of the White House” if he does not follow through on certain agenda items, *supra* ¶ 40.

There is little doubt that this kind of overt electioneering about specific candidates crosses a redline for 501(c)(3) organizations and is plainly disqualifying for their 501(c)(3) status. For example, in *Christian Echoes Nat. Ministry v. United States*, 470 F.2d 849 (10th Cir. 1972), the court concluded that an organization was disqualified from Section 501(c)(3) status because it

“used its publications and broadcasts to attack candidates and incumbents who were considered too” politically adversarial. *Id* at 856. Specifically, it “attacked President Kennedy in 1961 and urge[d] its followers to elect conservatives like Senator Strom Thurmond and Congressmen Bruce Alger and Page Belcher.” *Id*. Even though the organization did not “formally endorse” any candidate for office, the court nonetheless concluded that these public statements nevertheless were disqualifying.

Similarly, in *Branch Ministries v. Rossotti*, 40 F. Supp. 2d 15 (D.D.C. 1999), the court held that an organization was disqualified from Section 501(c)(3) status “because it had published or distributed a statement in opposition to a candidate for public office.” *Id*. at 21. Specifically, the organization took out an advertisement to “express[] its concern about the moral character of Governor Clinton” and his positions on “abortion on demand, homosexuality and the distribution of condoms to teenagers.” *Id*. at 17. The organization attempted to justify the advertisement as a “warning to members of [its Church]” and not a “participation in a political campaign.” *Id*. at 18. Disregarding the defendant’s characterization, the court concluded that its conduct disqualified it from Section 501(c)(3) status. *Id*. at 21. Both *Christian Echoes* and *Branch Ministries* involve conduct materially similar to FIEL’s described *supra*, because FIEL has attacked multiple candidates specifically using its social media pages and in other public statements.

Second, FIEL has an established track record of improperly “advocate[d] the adoption or rejection of legislation.” 26 C.F.R. § 1.501(c)(3)-1(c)(3)(ii)(b). It vigorously campaigned against Texas’s 2017 SB-4 and 2023 SB-4 legislation specifically. *See supra ¶¶ 29-33, 41-44*. And it also aggressively campaigned to retain DACA protections for aliens. *See supra ¶¶ 21-26*. Indeed, in significant respects, FIEL’s public and social media presence allow for a reasonable inference that

its *entire operation* is designed to advocate for or against legislation, such as the 2017 and 2023 SB-4s. *See supra ¶¶ 29-33, 42-47.* In significant respects, the majority of the public-facing statements posted to its social media concern *only* defeating 2023 SB-4. *See, e.g.*, Hanlan, Ex. T.

Similar to FIEL’s candidate-related statements, this legislation-direct conduct is disqualifying for Section 501(c)(3) treatment. For example, in *Fund for the Study of Econ. & Growth v. IRS*, 161 F.3d 755 (D.C. Cir. 1998), the court concluded that an organization was disqualified from Section 501(c)(3) status where the factual record was “replete with examples that the [organization] advocated a legislative agenda that favored repeal of the current tax code, and the installation of a flat tax.” *Id.* at 758, 760. And in *Christian Echoes*, the court concluded that it was disqualifying for a religious organization to issue publications “contain[ing] numerous articles attempting to influence legislation by appeals to the public to react to certain issues.” 470 F.2d at 855. FIEL’s conduct is materially similar to these examples. Moreover, Section 501(c)(3)’s prohibition on advocacy rests on a case holding that the American Birth Control League’s advocacy for the “repeal of laws preventing birth control” amounted to disqualifying conduct. *See Christian Echoes*, 470 F.2d at 854 (citing *Slee v. Commissioner of Internal Revenue*, 42 F.2d 184 (2d Cir. 1930)). There is no material difference between FIEL’s advocacy for repeal or defeat of Texas’s 2017 and 2023 SB-4 and the conduct deemed disqualifying in the decisions discussed immediately above.

None of FIEL’s potential responses would have merit. For example, FIEL may claim that Americans have a First Amendment right to engage in all of its challenged conduct. That is beside the point because it is well-established that an organization does not have a right to 501(c)(3) status

while it engages in this conduct. *See Regan v. Taxation With Representation of Wa.*, 461 U.S. 540, 550 (1983).

FIEL might also argue that the IRS concluded it is entitled to 501(c)(3) status, and that Texas has no right to second-guess that determination. But, as other State courts have held, “evidence of an organization’s section 501(c)(3) status, by itself, does not create a presumption that the entity is” compliant with overlapping State law. *Greater Jamaica Dev. Corp. v. New York City Tax Comm’n*, 25 N.Y.3d 614, 627 (2015); *see also Summers v. Cherokee Child & Fam. Servs.*, 112 S.W.3d 486, 531 (Tenn. Ct. App. 2002) (affirming State’s dissolution of 501(c)(3) for violating applicable rules); *New York ex rel. TZAC v. New Israel Fund*, 520 F. Supp. 3d 362, 385-86 (S.D.N.Y. 2021) (501(c)(3)’s alleged false certification that it did not engage “in direct or indirect political campaign activities” found material to whether it unlawfully enjoyed State benefits). The fact that the IRS, for whatever reason, has not seen fit to exercise its enforcement discretion to revoke FIEL’s Section 501(c)(3) status has no bearing on whether the State of Texas must likewise honor that status, with the attendant State tax benefits, when the State concludes that the organization has engaged in disqualifying conduct.

Finally, FIEL may argue that although it has engaged in disqualifying conduct, that conduct does not form a “substantial part” of its overall activities, and so the organization should continue to enjoy its Section 501(c)(3) status. *See 26 U.S.C. § 501(c)(3)* (containing “substantial part” qualification). That fails at the outset because where, as here, an organization “publish[es] or distribut[es]” statements regarding “any political campaign on behalf of (or in opposition to) any candidate for public office” the organization is disqualified from Section 501(c)(3) treatment regardless of how “substantial” those statements are. *Id.* Instead, the “substantial part”

qualification pertains only to the State's alternative ground for disqualification—namely, FIEL's advocacy for the adoption or rejection of legislation. But here too, FIEL's "substantial part" defense would fail. FIEL is not similarly situated to many other Section 501(c)(3) organizations that episodically issue a position on a particular policy issue. Instead, as described *supra*, FIEL's *raison d'être* appears to be to advocate for particular legislation; indeed, in significant respects, nearly its entire public facing communications have for months on end been dominated by messaging to defeat Texas 2017 SB-4 and 2023 SB-4. That is not how Section 501(c)(3) organizations are supposed to behave.

Courts typically eschew mathematical calculations for how much of an organization's activities must be impermissible in order to constitute a "substantial part" of the organization's overall activities. *See, e.g., Kuper v. C.I.R.*, 332 F.2d 562, 563-64 (3d Cir. 1964). Instead, so long as the improper activities are "not incidental," they are disqualifying. *Christian Echoes*, 470 F.2d at 855; *Krohn v. United States*, 246 F. Supp. 341 (D. Colo. 1965) (disqualifying to be more than "incidental"). But it is clear here that even by a mathematical formula, FIEL's social media and other public facing statements in support of or opposition to legislation would constitute a "substantial part" of its activities. *Nationalist Movement v. Comm'r*, 37 F.3d 216, 221 (5th Cir. 1994) ("45%" of activities is substantial "as a matter of law"); *cf. Seasongood v. C.I.R.*, 227 F.2d 907, 912 (6th Cir. 1955) ("less than 5%" of activities is not substantial).

PRAYER FOR RELIEF

The State incorporates by reference the preceding paragraphs and introduction as if fully set forth herein. As explained above, FIEL is engaged in systemic violations of the 501(c)(3) rules and, therefore, its governing documents that require compliance with such rules. Accordingly,

FIEL has performed or omitted an act that requires a surrender or causes a forfeiture of its rights and privileges as a corporation registered to transact business in Texas. *See, e.g.*, Tex. Gov't Code § 402.023; Tex. Civ. Prac. & Rem. Code § 66.001.

NOW THEREFORE, the State respectfully prays that the Court enter judgment in its favor and order the following:

- a. That the State has probable grounds to bring the instant quo warranto proceeding and has leave to file the instant petition;
- b. That the proposed quo warranto petition reflected herein is ordered and deemed filed, with process to be issued;
- c. That quo warranto relief is warranted;
- d. Temporary injunctive relief immediately halting FIEL's operations pending resolution of the petition on the merits;
- e. That FIEL forfeit its rights and privileges as a registered corporation;
- f. That FIEL's registration is immediately dissolved and void;
- g. Temporary and permanent injunctive relief prohibiting FIEL from conducting any operations in Texas;
- h. A receiver be appointed to wind up FIEL's affairs;
- i. The State be awarded all costs and expenses in prosecuting this Petition; and
- j. The State be awarded any further relief to which it demonstrates entitlement under the law.

Respectfully submitted,

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

JAMES LLOYD
Deputy Attorney General for Civil Litigation

RYAN S. BAASCH
Chief, Consumer Protection Division

/s/ Jason C. McKenney
JASON C. MCKENNEY
State Bar No. 24070245
Assistant Attorney General,
Managing Attorney,
Special Litigation & Non-Profit Enforcement
Jason.Mckenney@oag.texas.gov
Office of the Attorney General
Consumer Protection Division
12221 Merit Drive, Ste. 650
Dallas, Texas 75251
Tel: 214-290-8808
Fax: 214-969-7615

SCOTT FROMAN
Assistant Attorney General
State Bar No. 24122079
Scott.Froman@oag.texas.gov
Office of the Attorney General
Consumer Protection Division
P.O. Box 12548
Austin, Texas 78711-2548
Phone: (512) 463-1264
(512) 473-8301 (facsimile)

ATTORNEYS FOR THE STATE

CAUSE NO: _____

KEN PAXTON, in his official capacity as
Texas Attorney General, and THE
STATE OF TEXAS

Plaintiffs,
v.

FIEL HOUSTON, INC.

Defendant.

IN THE DISTRICT COURT

HARRIS COUNTY, TEXAS

JUDICIAL DISTRICT

VERIFICATION

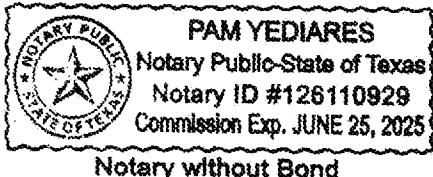
Before me, the undersigned notary, on this day personally appeared Scott Froman, the affiant, whose identity is known to me. After I administered an oath, affiant testified as follows:

"My name is Scott Froman. I am over 18 years of age and competent to make this verification and to testify to the matters stated herein, all of which are within my personal knowledge as an Assistant Attorney General employed at the Office of the Texas Attorney General. In my capacity as an Assistant Attorney General, I have read the document entitled 'The Office of the Attorney General and the State of Texas' Application for Temporary Injunction and [Proposed] Petition in the Nature of Quo Warranto,' and attest that the facts stated in paragraphs 17-52 of that document are true and correct."



Scott Froman

SUBSCRIBED AND SWORN TO BEFORE ME on this 2nd day of July 2024, to certify which witness my hand and official seal.



NOTARY PUBLIC IN AND FOR
THE STATE OF TEXAS

STATE OF TEXAS §
§
COUNTY OF HARRIS §

AFFIDAVIT OF RYAN HANLAN

Before me, the undersigned notary, on this day personally appeared Ryan Hanlan, the affiant, a person whose identity is known to me. After I administered an oath to affiant, affiant testified:

1. "My name is Ryan Hanlan. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.
2. I am an Investigator at the Office of the Attorney General of Texas, Consumer Protection Division. My regular duties include assisting the Division attorneys with investigations.
3. As part of my regular duties, I was assigned to this investigation of FIEL Houston, Inc. ("FIEL").
4. As a part of my investigation into FIEL, I extensively and personally reviewed the statements, representations, and content that FIEL has posted on its webpage and social media accounts. FIEL maintains a public-facing website at <https://fielhouston.org>. That website also contains links to FIEL's social media accounts on Facebook, Instagram, and TikTok. FIEL also maintains an account on X.com (formerly known as Twitter), as evidenced by the images its Facebook account reposts of this X.com account, as well as its displaying of this account's username.
5. Attached to this Affidavit as "Exhibit A" is a true and correct copy of FIEL's Certificate of Formation of a Nonprofit Corporation, which can be accessed directly from the Texas Secretary of State's webpage.
6. Attached to this Affidavit as "Exhibit B" is a true and correct image of a post on FIEL's Facebook page dated September 20, 2016, and captured on May 28, 2024, available at bit.ly/3z1zRes.
7. Attached to this Affidavit as "Exhibit C" is a true and correct image of a post on FIEL's Facebook page dated September 24, 2016, and captured on May 28, 2024, available at bit.ly/3z1zRes.

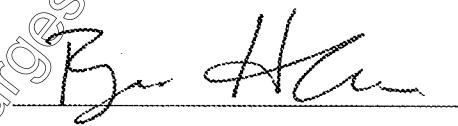
8. Attached to this Affidavit as “Exhibit D” is a true and correct image of a post on FIEL’s Facebook page dated October 9, 2016, and captured on May 28, 2024, available at bit.ly/3z1zRes.
9. Attached to this Affidavit as “Exhibit E” is a true and correct image of a post on FIEL’s Facebook page dated October 15, 2016, and captured on May 28, 2024, available at bit.ly/3z1zRes.
10. Attached to this Affidavit as “Exhibit F” is a true and correct image of a post on FIEL’s Facebook page dated October 4, 2016, and captured on May 28, 2024, available at bit.ly/3z1zRes.
11. Attached to this Affidavit as “Exhibit G” is a true and correct image of a post on FIEL’s Facebook page dated September 30, 2016, and captured on May 28, 2024, available at bit.ly/3z1zRes.
12. Attached to this Affidavit as “Exhibit H” is a true and correct image of a post on FIEL’s Facebook page dated April 28, 2017, and captured on May 28, 2024, available at bit.ly/3z1zRes.
13. Attached to this Affidavit as “Exhibit I” is a true and correct image of a post on FIEL’s Facebook page dated April 30, 2017, and captured on May 28, 2024, available at bit.ly/3z1zRes.
14. Attached to this Affidavit as “Exhibit J” is a true and correct image of a post on FIEL’s Facebook page dated April 26, 2017, and captured on May 28, 2024, available at bit.ly/3z1zRes.
15. Attached to this Affidavit as “Exhibit K” is a true and correct image of a post on FIEL’s Facebook page dated March 20, 2017, and captured on May 28, 2024, available at bit.ly/3z1zRes.
16. Attached to this Affidavit as “Exhibit L” is a true and correct image of a post on FIEL’s X.com (Twitter) account dated March 20, 2024, and captured on May 28, 2024, available at bit.ly/4e1VLJu.
17. Attached to this Affidavit as “Exhibit M” is a true and correct image of FIEL’s webpage, captured on May 28, 2024, available at bit.ly/3XnYuMu.
18. Attached to this Affidavit as “Exhibit N” is a true and correct copy of a news article, “Joe Biden Visited Houston On Friday. Protestors Were There To Greet Him,” published by Houston Public Media, captured May 28, 2024, available at bit.ly/3XhMigh.
19. Attached to this Affidavit as “Exhibit O” is a true and correct image of a post on FIEL’s Facebook page dated May 3, 2024, and captured on May 28, 2024, available at bit.ly/3z1zRes.

20. Attached to this Affidavit as "Exhibit P" is a true and correct copy of a news article, "Houston immigrant families to participate in nationwide demonstration on Monday," published by ABC13, captured May 28, 2024, available at bit.ly/3x63db7.
21. Attached to this Affidavit as "Exhibit Q" is a true and correct copy of a news article, "A 'Day Without Immigrants' in Houston," published by Workers World, captured May 28, 2024, available at bit.ly/4b3DCgA.
22. Attached to this Affidavit as "Exhibit R" is a true and correct image of an article on FIEL's webpage, captured on May 28, 2024, available at bit.ly/3z9iAjj.
23. Attached to this Affidavit as "Exhibit S" is a true and correct image of FIEL's Facebook page, captured on May 28, 2024, available at bit.ly/3z1zRes.
24. Attached to this Affidavit as "Exhibit T" is a true and correct image taken from FIEL's Instagram page, captured on May 28, 2024, available at bit.ly/3XnZznw.
25. Attached to this Affidavit as "Exhibit U" is a true and correct image of a post on FIEL's X.com (Twitter) account dated April 1, 2024, and captured on May 28, 2024, available at bit.ly/4eVLJu.
26. Attached to this Affidavit as "Exhibit V" is a true and correct image of a post on FIEL's X.com (Twitter) account dated February 28, 2024, and captured on May 28, 2024, available at bit.ly/4eVLJu.
27. Attached to this Affidavit as "Exhibit W" is a true and correct image of a post on FIEL's X.com (Twitter) account dated February 29, 2024, and captured on May 28, 2024, available at bit.ly/4eVLJu.
28. Attached to this Affidavit as "Exhibit X" is a true and correct image of a post on FIEL's X.com (Twitter) account dated March 19, 2024, and captured on May 28, 2024, available at bit.ly/4eVLJu.
29. Attached to this Affidavit as "Exhibit Y" is a true and correct copy of a news article, "Abbott pushes back against protestor disrupting parental empowerment event," published by The Center Square, captured May 28, 2024, available at bit.ly/4bWZL1D.
30. Attached to this Affidavit as "Exhibit Z" is a true and correct image of a post on FIEL's X.com (Twitter) account dated April 25, 2024, and captured on May 28, 2024, available at bit.ly/4eVLJu.
31. Attached to this Affidavit as "Exhibit AA" is a true and correct image of a post on FIEL's Facebook page dated May 2, 2023, and captured on June 11, 2024, available at bit.ly/3z1zRes.

32. Attached to this Affidavit as "Exhibit BB" is a true and correct image of a post on FIEL's Facebook page dated June 22, 2023, and captured on June 11, 2024, available at bit.ly/3z1zRes.

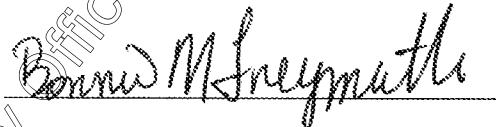
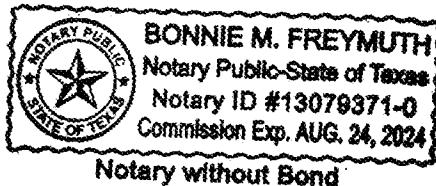
33. Attached to this Affidavit as "Exhibit CC" is a true and correct image of a post on FIEL's Facebook page dated July 18, 2023, and captured on June 11, 2024, available at bit.ly/3z1zRes.

FURTHER AFFIANT SAYETH NOT



Ryan Hanlan

SUBSCRIBED AND SWORN TO BEFORE ME on this 2nd day of July 2024, to certify which witness my hand and official seal.



BONNIE M. FREYMUTH
NOTARY PUBLIC IN AND FOR

THE STATE OF TEXAS

Unofficial Copy Office of Marilyn Burgess District Clerk

EXHIBIT A

FILED
In the Office of the
Secretary of State of Texas

JAN 21 2011

Corporations Section

**CERTIFICATE OF FORMATION OF
FIEL HOUSTON, INC.
A NONPROFIT CORPORATION**

This certificate of formation is submitted for filing pursuant to the applicable provisions of the Texas Business Organizations Code.

Article I - Entity Name and Type

The name and type of filing entity being formed are: **FIEL Houston, Inc.**, a Texas nonprofit corporation (hereinafter "Corporation").

Article II - Purpose

The Corporation is organized for charitable, religious, scientific, literary, or educational purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code of 1986 (the "Code"), and the Texas Tax Code, Section 11.18. In particular the Corporation shall offer educational forums, workshops, sessions and other activities focusing on immigration and education as it affects immigrant families and youth struggling with these issues.

Article III - Restrictions and Limitations

Notwithstanding the foregoing or anything to the contrary herein, the Corporation may not:

- A. Engage in any activity or take any action prohibited by the applicable provisions of the Texas Business Organizations Code.
- B. Pay any dividend or distribute any part of the income of the Corporation to its members, if any, directors, if any, or officers. However, the Corporation may pay compensation in a reasonable amount to its members, directors, or officers for services rendered, may confer benefits upon its members in conformity with its purposes, provided such compensation and benefits are reasonable.
- C. Make loans to the Corporation's directors.
- D. Engage in any activities, except to an insubstantial degree, that are not in furtherance of the purpose or purposes of the Corporation.
- E. Conduct or carry on any activities not permitted to be conducted or carried on by an organization exempt from taxation under Section 501(c)(3) of the Internal Revenue Code and its regulations, or by an organization, contributions to which are deductible under Section 170(c)(2) of the Internal Revenue Code and regulations.

F. Serve any private interest except if clearly incidental to the public benefit provided by the Corporation.

G. Allow any of the Corporation's net earning to inure to the benefit of the members, if any of the Corporation, or any private individual.

H. Engage in more than an insubstantial degree in the carrying on of propaganda, or otherwise attempting, to influence legislation, and the Corporation shall not directly or indirectly participate in, or intervene in (including the publication or distribution of statements) any political campaign on behalf of any candidate for public office, except as allowed by Internal Revenue Code and its regulations.

I. Make distributions at such time and in such manner as to subject it to tax under Section 4942 of the Code.

J. Engage in any act of self-dealing which would be subject to tax under Section 4941 of the Code.

K. Retain any excess business holdings which would subject it to tax under Section 4943 of the Code.

L. Make any investments which would subject it to tax under Section 4944 of the Code.

M. Make any taxable expenditures which would subject it to tax under Section 4945 of the Code.

Article IV - Registered Office and Registered Agent

The initial registered agent is an individual resident of the state whose name is Cesar Espinosa. The business address of the initial registered agent and the initial registered office is: 7642 Shavano Ln, Cypress, TX 77433.

Article V - Organizer

The name and address of the organizer is:

Name

Arturo D. DeLeon, Jr.

Address

3605 Katy Fwy, Ste 102, Houston, TX 77007

Article VI - Governing Authority

Management of the affairs of the Corporation is to be vested in its board of directors. The number of initial directors shall be three (3). The number of directors shall be set by the bylaws of the Corporation as may be amended from time to time, provided that the number of directors may never be less than three. The names and addresses of the persons who are to serve as directors until the first annual meeting or until their successors are elected and qualified are:

<u>Name</u>	<u>Address</u>
1. Leandra O. Espinosa	7642 Shavano Ln, Cypress, TX 77433
2. Cesar O. Barrera	180 Sharpstown Center, Houston, TX 77036
3. Aura H. Barrera	7642 Shavano Ln, Houston, TX 77433

Article VII - Organizational Structure

The Corporation will not have members.

Article VIII - Indemnification

To the full extent permitted by the applicable provisions of Title 1, Chapter 8 of the Texas Business Organizations Code and other applicable law, the Corporation shall advance or reimburse expenses to and indemnify any present and former directors, officers, employees, and agents of the Corporation and persons serving or formerly serving at the request of the Corporation as directors, officers, partners, venturers, proprietors, trustees, employees, agents or similar functionaries of another foreign or domestic corporation, employee benefit plan, other enterprise or entity against judgments, penalties (including excise and similar taxes), fines, settlements and reasonable expenses actually incurred by the person in any threatened, pending or completed action, suit or proceeding, whether civil, criminal, administrative, arbitrative or investigative, any appeal in such action, suit or proceeding and any inquiry or investigation that could lead to such an action suit or proceeding, because the person is or was acting in one of the capacities set forth above.

Article IX - Distribution of Assets Upon Winding Up

After all liabilities and obligations of the Corporation in the process of winding up are paid, satisfied and discharged, the property of the Corporation shall be applied and distributed in accordance with section 22.304, Texas Business Organizations Code.

Article X - Effective Date of Filing

This certificate of formation becomes effective when the document is filed by the secretary of state.

Article XI - Execution

The undersigned affirms that the person designated as registered agent has consented to the appointment. The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument and certifies under penalty of perjury that the undersigned is authorized to execute the filing instrument.

Date: January 5, 2011



Arturo D. DeLeon, Jr.

EXHIBIT B

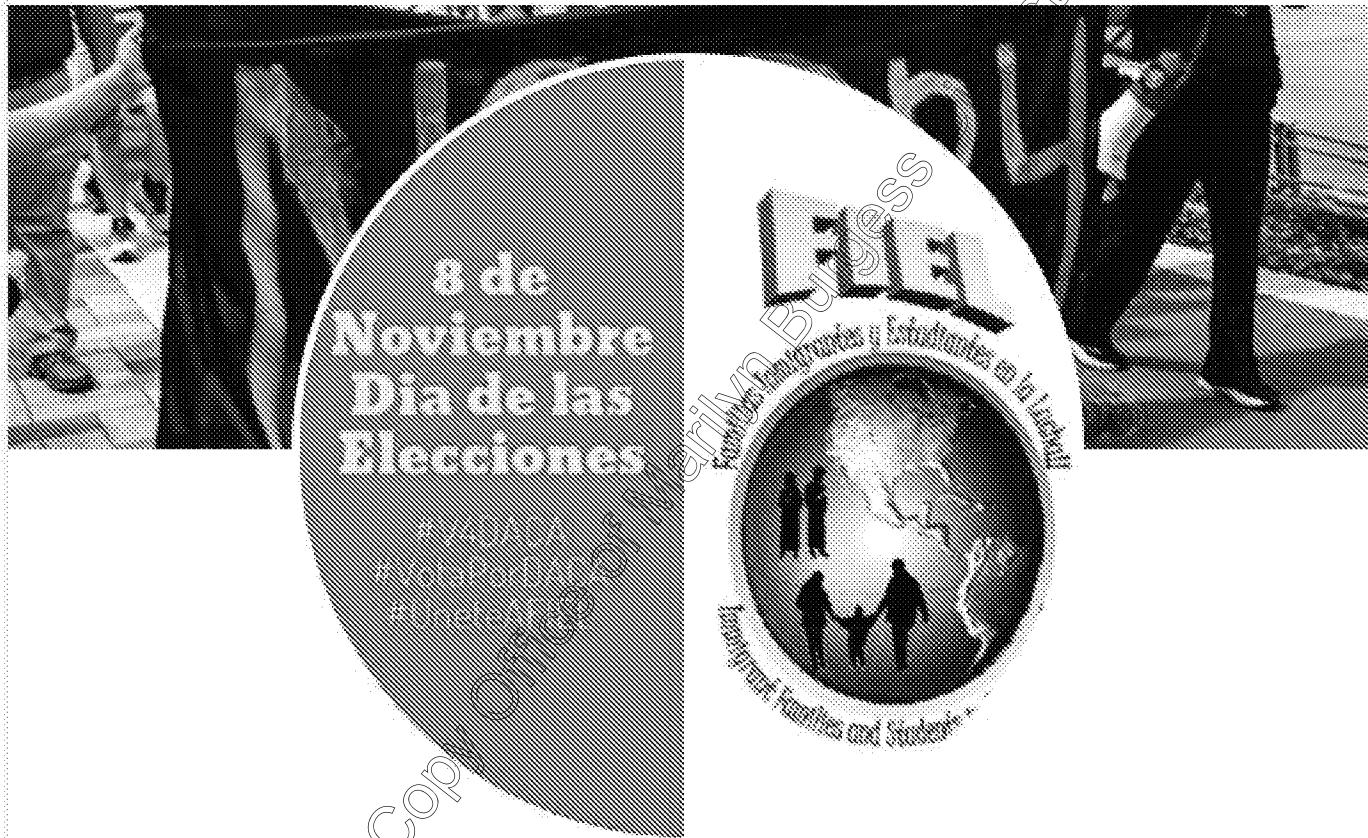
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Fiel Houston updated their profile picture.

September 20, 2016 ·

...



22

4 shares

Like

Comment

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Unofficial Cop

EXHIBIT C

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Fiel Houston

September 24, 2016 ·

Pasando ahorita Taller de Movilización del Voto #V4DACA #VOTEFORDACA #UneteAFIEL

[See Translation](#)



6

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EXHIBIT D

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Fiel Houston

October 9, 2016 ·

...

Faltan 29 días para el día de las Elecciones #V4DACA #VotaPorDACA #UneteAFIEL

29 days left until the election day #V4DACA #VotaPorDACA #UneteAFIEL

Hide Translation · Rate this translation

**FALTAN
29 DIAS
PARA EL
DIAS DE LAS
ELECCIONES**

La fecha límite
para registrarte a
votar es este
MARTES 11 de
Octubre.
Regístrate y vota
el 8 de
Noviembre
#V4DACA
#VotaPorDACA
#UneteAFIEL



1

4 shares

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EXHIBIT E

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Fiel Houston
October 15, 2016 ·

...

Faltan 23 días para el dia de las elecciones. #V4DACA #VotaPorDACA

23 days until election day. #V4DACA #VotaPorDACA

[Hide Translation](#) · [Rate this translation](#)

FAULTAN 23 DIAS PARA LA ELECCIONES



EL DIA DE LAS ELECCIONES ES EL 8

DE NOVIEMBRE. ¡VE Y VOTA!

#V4DACA #VOTAPORDACA

#UNETAFIEL

EL DIA

DE

NOVIEMBRE

ES

EL 8

DE

NOVIEMBRE

ES

EL 8

DE

NOVIEMBRE

ES

EL 8

4

1 share

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EXHIBIT F

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Fiel Houston

October 4, 2016

Faltan 35 días para el Dia de Elecciones #V4DACA #VotaPorDACA

35 days until Election Day #V4DACA #VotaPorDACA

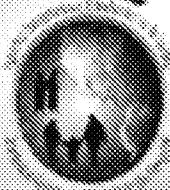
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click

**FAILTAN 34 DIAS PARA EL
DIA DE LAS ELECCIONES.**

FAILTAN 34 DIAS PARA LAS ELECCIONES.
ESTE ES EL ÚLTIMO DIA PARA REGISTRARSE PARA VOTAR EN LAS
ELECCIONES. REGISTRATE Y VOTA.
#V4DACA #VOTAPORDACA
#VOTAPORLOSQUEESTANENLOSESTADOSUNIDOS
#VOTAPORLOSQUEENESTADOSUNIDOS

EL 8 DE NOVIEMBRE



4 shares

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EXHIBIT G



Fiel Houston

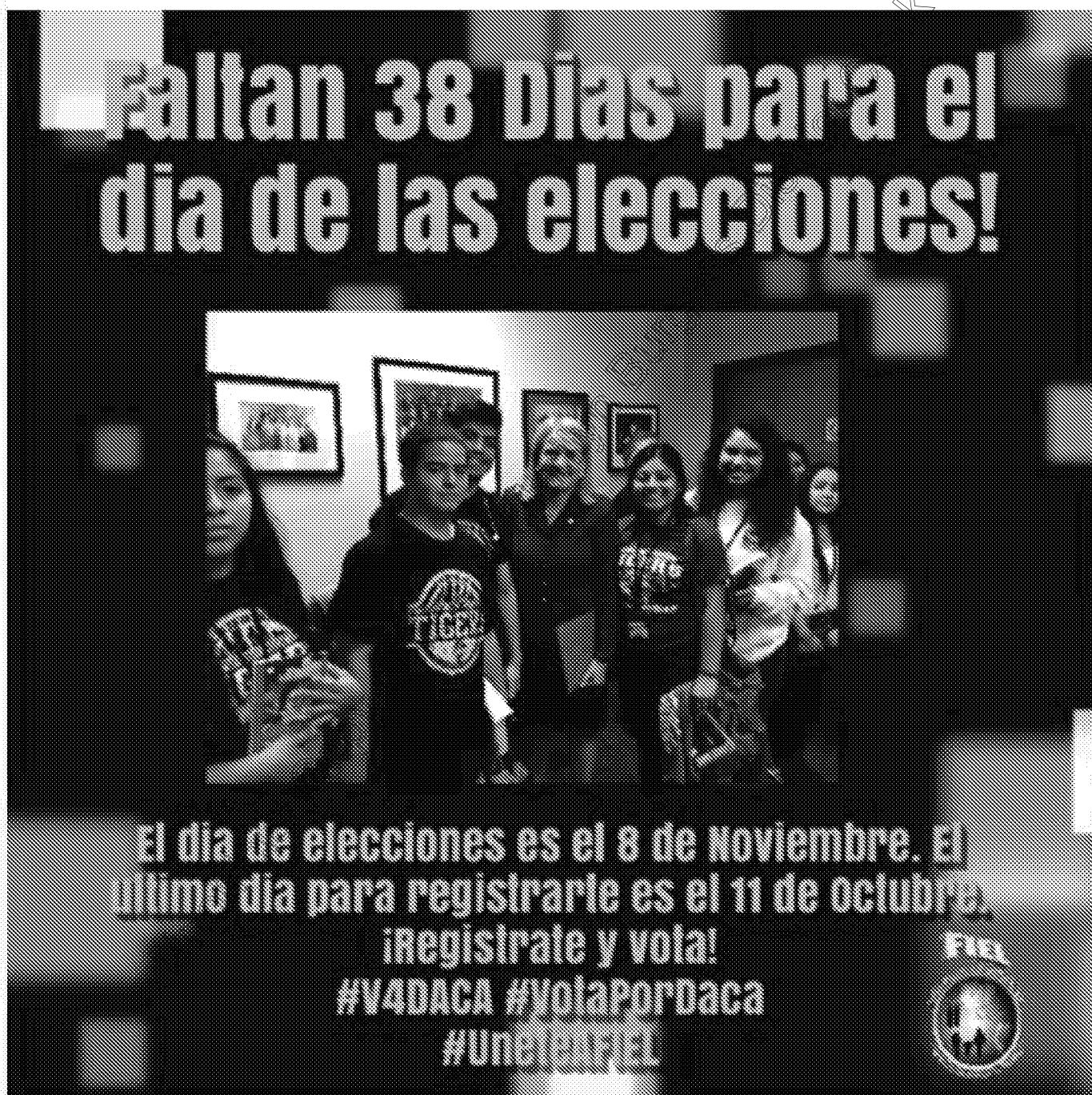
September 30, 2016 ·

...

Faltan 38 días para el dia de las elecciones #V4DACA #VotaPorDACA #UneteAFIEL

38 days until election day #V4DACA #VotaPorDACA #UneteAFIEL

[Hide Translation](#) · [Rate this translation](#)



El dia de elecciones es el 8 de Noviembre. El ultimo dia para registrarte es el 11 de octubre.

¡Registrate y vota!

#V4DACA #VotaPorDACA

#UneteAFIEL



4

1 share

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Comment

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EXHIBIT H

Unofficial Copy Office of Marilyn Burgess District Clerk



Fiel Houston

April 28, 2017 ·

...



Fiel Houston

April 28, 2017 ·

Unidos, Podemos retar la #SB4 en las cortes y en las calles. Un grupo legal de expertos estan mirando cual seria la estrategia legal a seguir. Mientras que las ... See more

United, we can challenge #SB4 on the courts and on the streets. A group of legal experts are looking at what the next legal strategy would be. Meanwhile grassro... See more

Hide Translation · Rate this translation

RIOGRANDEGUARDIAN.COM

Torres: We will challenge SB 4 in the courts and the streets

We like to think of Texas as a big state with a bigger heart. We value neighborliness and be...

19

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EXHIBIT I

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Fiel Houston

April 30, 2017 · 0



Fiel Houston

April 30, 2017 · 0

Clerk

Hoy a las 10PM en vivo en Noticias 45
Houston anuncio sobre la marcha en
contra de la deportaciones y la ley #SB4
MUERTE AL ICE

Today at 10PM live on Noticias 45 Houston announcement about the march against deportation and the law #SB4 #UNETeaFIEL

• Hide Translation · Rate this translation

60 7

Like

Comment

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EXHIBIT J

Unofficial Copy Office of Marilyn Burgess District Clerk



Fiel Houston

April 26, 2017 • 6

...



Fiel Houston

April 26, 2017 • 6

...

Sin Papelés / Sin Miedo #StopSB4 #AltoSB4 #UneteaFIEL #JoinFIEL

See Translation



Like

Comment

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EXHIBIT K

Unofficial Copy Office of Marilyn Burgess District Clerk



Fiel Houston is with Johanna Elizabeth.

March 20, 2017 •

...

La lucha sigue #noSB4

The fight continues #noSB4

[Hide translation](#) • [Rate this translation](#)

district Clerk



0 7

1 comment 1 share

Like

Comment

Share

EXHIBIT L

Unofficial Copy Office of Marilyn Burgess District Clerk

clerk

01 FIEL Houston  reposted

 **FIEL Houston**  @FIELHouston · Mar 20
March against #SB4 #Houston SHARE!

...

MARCHA EN CONTRA DE LA **SB4**

30 MARZO, 2024

11:00AM

ANTIOCH PARK
554 CLAY ST.
HOUSTON, TX 77002



@FIELHOUSTON



1



9



11



949



MARCH AGAINST **SB4**

MARCH 30, 2024

11:00AM

ANTIOCH PARK
554 CLAY ST.
HOUSTON, TX 77002



@FIELHOUSTON



Uno

EXHIBIT M

Unofficial Copy Office of Marilyn Burgess District Clerk

We are always working to push for immigration reform. Please refer back to our page for updates.



☆ Like



2 Likes

EXHIBIT N

Unofficial Copy Office of Marilyn Burgess District Clerk

HOUSTON PUBLIC MEDIA

A SERVICE OF THE UNIVERSITY OF HOUSTON

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PBS Passport

PBS Kids

PBS LearningMedia

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DEVELOPING STORY Houston storms: More than 300,000 without power Tuesday afternoon

is how we take care of YOUR PEOPLE.

Houston

• This article is over 3 years old

POLITICS

Joe Biden Visited Houston On Friday. Protestors Were There To Greet Him

Where the president goes, so do demonstrations. And Houstonians showed up to the Houston Food Bank to have their voices heard.

Louis Vassquez / Paul D'Amato (AP) | February 26, 2021, 10:17 AM



Bonnie Krogsgaard/Houston Public Media

Demonstrators outside the Houston Food Bank on Feb. 26, 2021, during a visit from President Joe Biden. Professor Yosef Kidane, part of Houston's Tigray community, said they were demanding action to help the Ethiopian region that has been饱受折磨 in recent months.

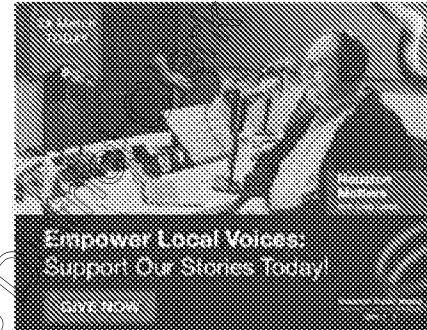
PHOTO: BONNIE KROGSGAARD/HOUSTON PUBLIC MEDIA

President Joe Biden and first lady Jill Biden made their first visit to Houston since the election on Friday, making a stop at the Houston Food Bank, where they helped pack food and water for people still struggling from last week's winter storm.

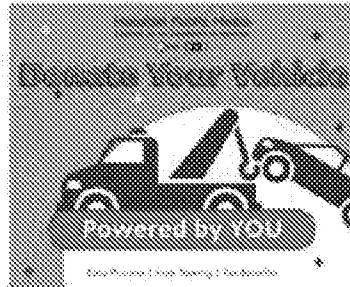
But outside the food bank, demonstrators were waiting.

They were there to protest human rights abuses. They were there to protest immigration policies. And some were even there to protest the very legitimacy of Biden's presidency, spreading conspiracy theories about a stolen election.

Yosef Kidane, joined by other members of Houston's Tigray community, showed up to bring attention to atrocities in Ethiopia.



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Ethiopian and Eritrean forces took control of the town of Axum in the Tigray region last year, committing what Amnesty International has called war crimes, the *Washington Post* reported. One massacre by Eritrean troops may even be a crime against humanity, according to a report from the *New York Times*.

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Lucio Vasquez/Houston Public Media

A demonstrator holds a sign outside the Houston Food Bank during President Joe Biden's visit on Feb. 25, 2021.

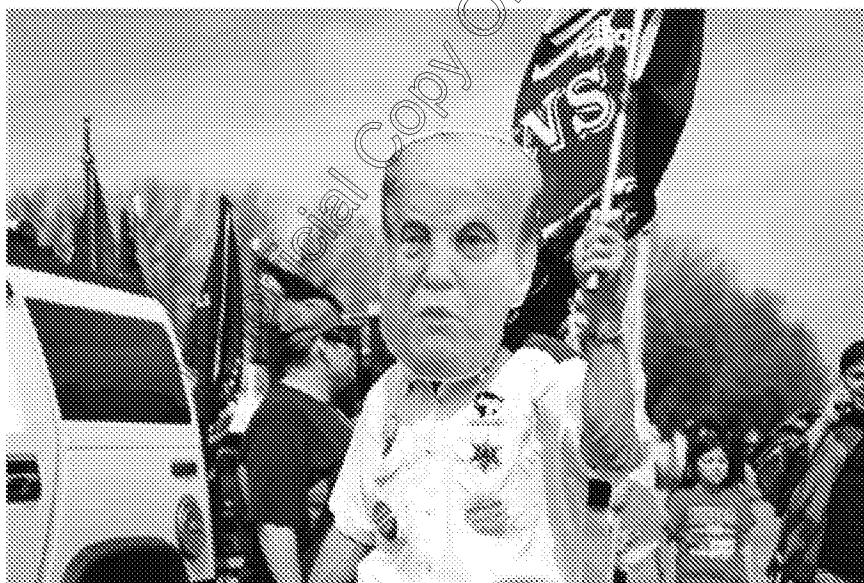
Hundreds were likely killed in November when Eritrean soldiers conducted house-to-house searches and shot civilians on the street, according to the Post.

"Imagine that happening to a place like Houston for three months," Kidane said. "We have a population of 6 million people who are really unaccounted for in this world, and no one's really paying attention to us."

Kidane and others demanded action from the Biden administration, with people chanting things like "Stop the Genocide," "stop the hunger," and "Eritrean troops out of Tigray."

As the largest financial contributor to the United Nations, Kidane said the administration could pressure the U.N. to deploy more resources to the Tigray for humanitarian aid. Protestors also called for the removal of occupying forces from the region.

"He needs to act immediately," Kidane said. "Not give any comments, not give any statements, but actually go into action."

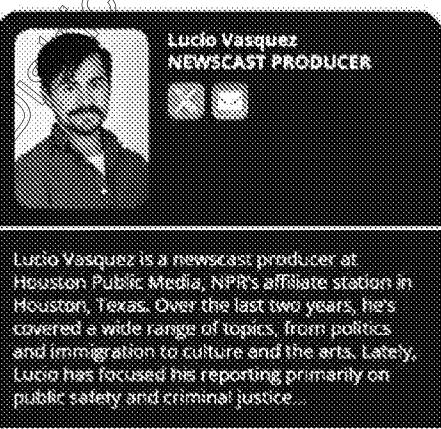


Lucio Vasquez/Houston Public Media

A man in a Donald Trump mask protests outside the Houston Food Bank during President Joe Biden's visit.

In Houston

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Lucio Vasquez is a news producer at Houston Public Media, NHK's affiliate station in Houston, Texas. Over the last two years, he's covered a wide range of topics, from politics and immigration to culture and the arts. Lately, Lucio has focused his reporting primarily on public safety and criminal justice.

Know more about Lucio Vasquez

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Paul DeBenedetto

Across the street, a very different kind of demonstration was taking place.

People carried Donald Trump flags that said "Keep America Great" and "The Rules Have Changed." A white hearse parked nearby displayed an open casket with a prop "mail-in ballot," in reference to conspiracy theories about the 2020 presidential election.

"We wanted to basically let everybody know that we still feel that the president is Donald Trump, and we wanted to show our freedom to get out here and do our rights to let everyone know that we support Trump and we feel like the election was stolen," said Protestor Derek Smits.

The now-debunked lie from former President Donald Trump — that millions of votes were stolen or not counted in key states across the U.S. — has been cited as a main cause for the Jan. 6 insurrection, in which pro-Trump extremists stormed the U.S. Capitol to try to derail the certification of the election results. Trump was impeached in the U.S. House of Representatives earlier this year in connection with the QAnon insurrection, though he was later acquitted by the Senate.



Donald Trump supporter Derek Smits waves a flag in support of the former president outside the Houston Food Bank during a visit from President Joe Biden on Feb. 26, 2021. Smits said the protest was there because they "feel like the election was stolen."

A survey poll from the Texas Tribune and the University of Texas found that just 32% of registered voters in Texas thought national election results were either "very" or "somewhat" accurate, while 39% think the results were "very inaccurate."

For weeks, Trump and others — including Texas Attorney General Ken Paxton — attempted to overturn the results of the election, with unsubstantiated claims of fraud. It was later revealed that Paxton's failed lawsuit originated with lawyers close to the Trump campaign.

In total, Trump and his supporters lost 86 lawsuits alleging fraud in states across the country.

Asked what he wants from the president, Smits said he wanted the president to "put America first."



A Donald Trump supporter stands beside a casket outside the Houston Food Bank during President Joe Biden's visit on Feb. 26, 2021. Inside the casket was a fake "mail-in ballot," referencing a debunked conspiracy theory that millions of votes were stolen or not counted during the presidential election.

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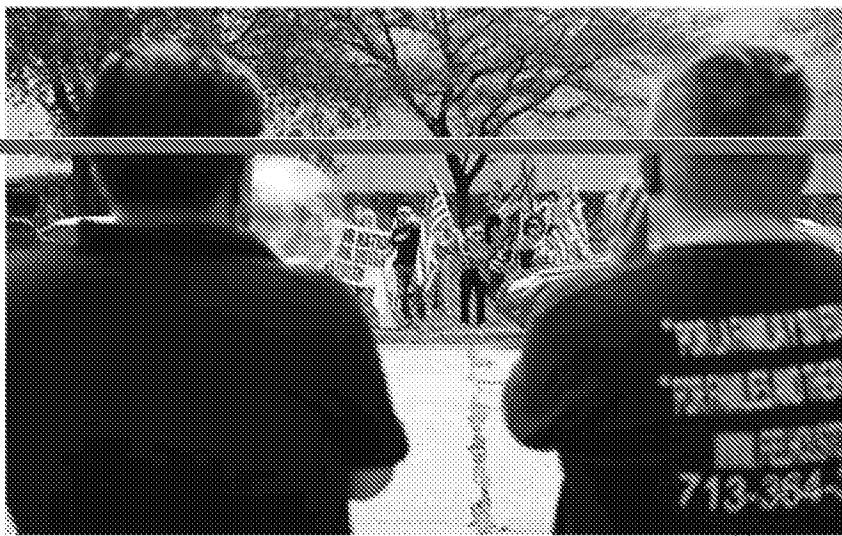
"He doesn't necessarily have to be a Trumpper, but if he would have the policies that Trump had, all these people right here would be all on board with Biden," Smits said.

Smits said he was "pumped up" about the energy from the pro-Trump crowd, and even showed support for the demonstrators directly across from him.

"You see people across the street who don't have the same feelings that we do," Smits said. "But that's OK, because that's their right."

That support did not extend to a pair of counterprotesters from a local immigrant civil rights group, who showed up later in the day.

Two members from FIEL Houston showed up in the afternoon in response to the pro-Trump demonstrators, prompting a shouting match between the two sides. Smits began to insult the group and their descendants, as FIEL Executive Director Cesar Espinoza announced "Trump lost" over a bullhorn.



Members of FIEL Houston confront Donald Trump supporters outside of the Houston Food Bank during Joe Biden's visit on Feb. 26, 2021.

The spur-of-the-moment decision to show up meant just Espinoza and one other FIEL member were in attendance around 2 p.m., but the men nonetheless said they wanted to make an effort to confront the Trump supporters.

"Just like our commitment was from the very beginning of the Trump presidency, we were going to show up to wherever these folks are to try and shut them down, and to try and educate them on all of the bad things that President Trump has done, and everything bad that he stands for," Espinoza said.

Despite giving Biden "the benefit of the doubt," Espinoza said he was disappointed in the administrator's decision to reopen border shelters for teens that previously operated under the Trump administration, used to house unaccompanied minors crossing the border from Mexico.

The Biden administration has pushed back against the shelters, arguing that while the facilities are the same, they differ in how they're run. In a previous administration, a facility in Colorado Springs is run by the Department of Health and Human Services, and offers both medical care and education for kids.



FIEL Executive Director Cesar Espinoza uses a bullhorn to tell protesters "Trump lost" outside the Houston Food Bank during President Joe Biden's visit on Feb. 26, 2021.

But Espinosa said those changes weren't good enough, and argued that the facilities should be shut down for good. He also expressed hope that local leaders meeting with the president on Friday would press him on the issue.

"The great majority of kids that are coming over -- a lot of them teenagers, a lot of them pre-teens -- are coming over because they know they have to be here, and we're trying to encourage them to continue to detain them," he said. "They can definitely see their day in court outside of detention."

Still, Espinosa said Biden's Friday visit was important for a region still reeling from the impact of last week's severe winter storm.

"Many people lost their lives, many people lost everything," Espinosa said. "It's important that he's here, so he sees the damage firsthand. But more importantly, that he takes a snapshot of Houston, so that he knows what he's dealing with in terms of population shift, in terms of demographic shift, in terms of language shifts in the United States in the short term."



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Fiel Houston

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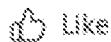


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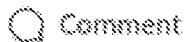
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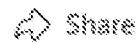
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IMMIGRATION

Houston immigrant families to participate in nationwide demonstration on Monday

Friday, February 11, 2022

• X • n •



"At the end of the day, whenever we talk about immigration, we always associate it to Latinos, but it's so much more than that," said the director of FIEL Houston.

HOUSTON, Texas (KTRK) -- FIEL Houston, a local advocacy organization, announced Friday that other groups representing immigrants from around the world will participate in a nationwide awareness campaign.

'A Day Without Immigrants,' the nationwide event sparked from a TikTok post by a student in College Station.

Cesar Espinosa, the executive director of FIEL Houston, said the goal of the campaign is to show how immigrant families have a significant impact in the communities they call home.

"We've been in talks with folks from the South Asian community. There's a group of Korean immigrants that will be here on Saturday to support us," Espinosa said. "We've also reached out to the NAACP to different organizations in the Haitian community, because at the end of the day, whenever we talk about immigration, we always associate it to Latinos, but specifically here in Houston, it's so much more than that. We hope to be reflective of that on Monday."

The Houston area is known for having one of the largest growing populations of immigrants and refugees, including 1.6 million immigrants and more than 500,000 residents who are undocumented, according to FIEL Houston.

"They're our neighbors, they are our friends, and they are people that are contributing every single day," Espinosa said. "We always give the examples when we go out to schools. We talk to kids that one out of 10 Houstonians is undocumented."

Immigration



Katy ISD trustee defends question about tracking immigration status



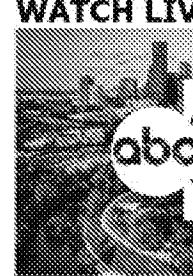
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The goal is to push President Joe Biden's administration to start creating Comprehensive Immigration Reform that can be passed. This will hopefully help build a path to citizenship and legal status as the Biden campaign promised during the presidential election.

"I've been here with a lot of fear of getting deported every single day," Juan Ramon, a local business owner said.

The rally is expected to start at noon on Monday, Feb. 14 at Guadalupe Plaza Park.

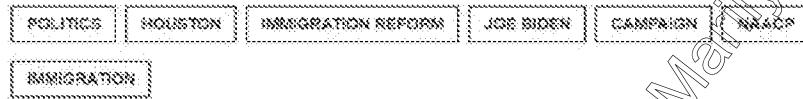
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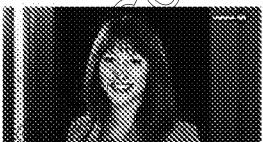
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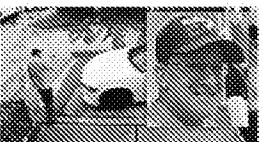
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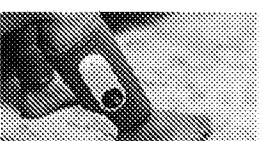
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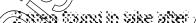
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A 'Day Without Immigrants' in Houston

By Gloria Duran posted on February 13, 2024

Valentine's Day became a "Day Without Immigrants" around the country this year. In Houston hundreds rallied and marched Feb. 14 to tell President Joe Biden, "You better keep your promises, or we will show you the exit door."



Day Without Immigrants, Houston, Feb. 14.

Organizers called for those who identified with immigrants' rights to do no work, no school and no shopping on that day, to call attention to the important role of immigrants in all aspects of U.S. society.

FIEL (Immigrant Families and Students in Struggle - Familias Inmigrantes y Estudiantes en la Lucha) gathered immigrants living in Houston for a rally at Plaza Guadalupe, a march to City Hall and a rally there.

Cesar Espinosa, a leader of FIEL, told the crowd, "To the Biden administration, I say this, 'Enough is enough. You have the power. If you do not deliver on your campaign promises, we will deliver — your exit ticket out of the White House.'"

Espinosa began his talk with a loving acknowledgement to all the parents. "Thank you. You gave so much of yourselves, your youth, to this country, so that we could have a better life."

From infants to elders, families, friends and activists from one of the most diverse cities in the U.S. arrived with signs, banners and flags. They were from Mexico, El Salvador, Guatemala, Korea and Africa. There were rainbow LGBTQ+ flags and pastel Trans Liberation flags.

Andrea, a Mexican trans woman, spoke in Spanish for the Organización Latina de Trans en Texas saying, "We are a Latina trans organization, and we are here with everyone; because Houston is our home, and we all deserve a better quality of life."

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This week's PDF





Korean speaker Hyunja Norman, Houston's Day Without Immigrants, Feb. 18.

A Korean delegation came with drums and signs in several languages in support of the day. Their speaker, Hyunja Norman, called for unity among all of Houston's immigrants.

One particularly moving speaker was 12-year-old Amaraah Melgarejo, who shyly spoke of how proud she was to be there with her grandmother who had sacrificed to bring her to Texas, and now they were marching together in Houston.

Carlos Eduardo Espina, a young immigrant who lives in nearby College Station, initiated the Day Without Immigrants on his TikTok page, where he has over 2.5 million followers. Espina makes videos in Spanish about immigration. He said in a Feb. 11 Op-Ed in the Los Angeles Times that this protest is meant to pressure Biden into prioritizing protecting immigrants: "Thousands of immigrants from across the country have said they're going to participate."

Many at the Houston protest felt Biden had failed to deliver on his campaign promises regarding immigration reform. Raquel Haifa Chantres, who carried a sign directly appealing to Biden, said she won't give up the fight until something changes. She said, "We just want to live here with dignity, real dignity."

As the closing rally ended, there was a question asked, "Are you all ready to march on May Day?" The answer was a loud and rousing "YES!"

Credit: WW Photo: Gloria Rubac



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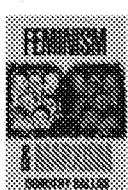
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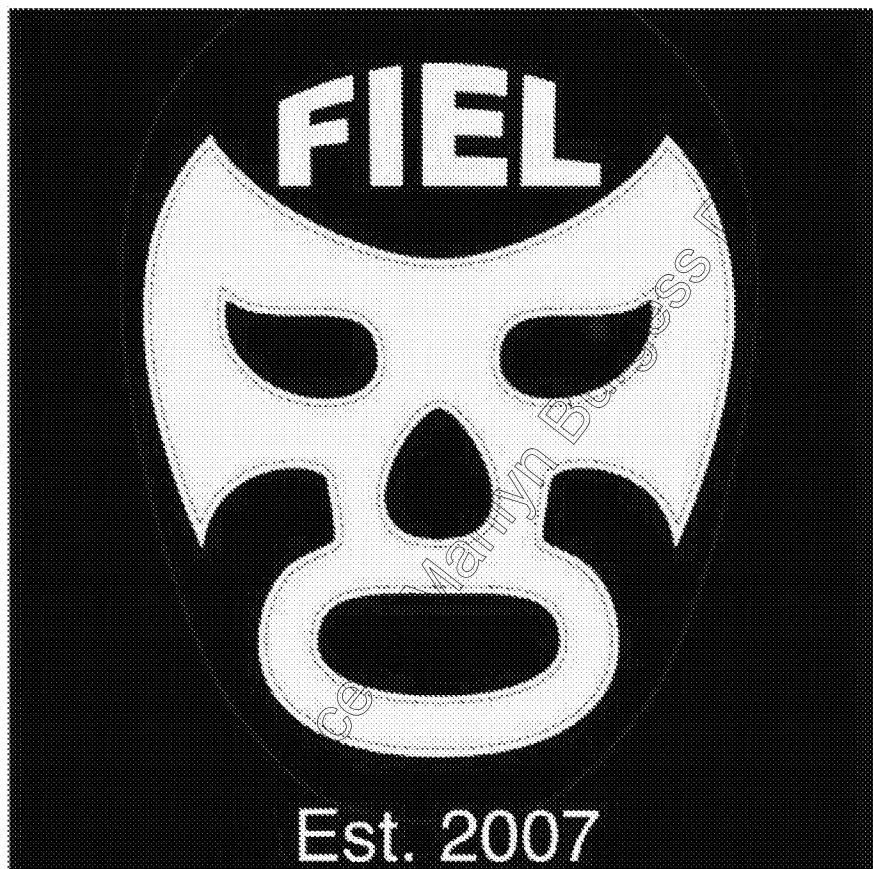
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December 18, 2023

FIEL STATEMENT ON THE SIGNING OF SB4

Posted by Houston - Uncategorized



PRESS STATEMENT

FOR IMMEDIATE RELEASE

Contact:
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Executive Director
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E-Mail: cespinosa

Alain Cisneros (Español)

Campaigns Coordinator

Cell: 832-503-2689

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FIEL STATEMENT ON SIGNING OF SB4

[HOUSTON, TX] On Monday December 18 Governor Abbott signed the controversial SB4 law. FIEL releases the following statement. FIEL Spokespeople are available for comment.

" We are a few days away from the holidays and once again the State of Texas has delivered a devastating blow to the immigrant community. Because of personal political ambition, greed and hate Gov Abbot has continued with his crusade to attack the immigrant community to fortify himself and his base. After many years of trying to bridge the gap between the immigrant community and law enforcement it feels like overnight this work has been undone. The damage has already been done, these last few weeks our office has been inundated with calls about people with questions and fears about SB4. We want to remind the community to remain calm since, although they are bad laws, they have yet to be implemented. At this point we also have questions about how and if they may even be able to be implemented. All we know is what the law reads and all we want to do is to begin to prepare our community for may or may not come. " -- Cesar Espinosa
FIEL Executive Director

FIEL: Immigrant Families and Students in the Fight is an Immigrant Led Civil Rights Organization that advocates for just laws for all families, access to higher education for all people regardless of immigration status, and for the rights of all people in unjust situations.

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Executive Director, FIEL HOUSTON INC

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About the author

Hi! My name is Jean Smith, I'm a travel blogger from the UK and founder of Never. In this blog I share my adventures around the world and give you tips about hotels, restaurants, activities and destinations to visit. You can watch my videos or join my group tour's that I organize to selected destinations. (Suggestions? You could use the Author Biography block here)

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A collage of 12 social media posts from the 'FIEL' account, featuring lucha libre, immigration, and political protest content. The posts include images of lucha libre masks, protest signs, and text related to SB4 and immigration. The posts are arranged in a grid format with a halftone dot pattern.

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FIEL Houston  @FIELHouston • Apr 1

March against #SB4 in Houston.

Thank you @violetaalvarez for capturing the moment!



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FIEL Houston @FIELHouston · Feb 28

“We’re not going to stand by idly”: Houston immigrant rights groups prepare for SB 4



“We’re not going to stand by idly”: Houston immigrant rights groups prepare for ...

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FIEL Houston  @FIELHouston · Feb 29

BREAKING NEWS: A federal judge blocks SB4 from taking effect on March 5th #latuchasigue



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03 FIEL Houston reposted



FIEL Houston @FIELHouston · Mar 19

Breaking news on #SB4 the Supreme Court went back on the decision issued yesterday dealing a terrible blow to our community. #PREPARE #RESIST



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**THE SUPREME COURT
WENT BACK ON IT'S
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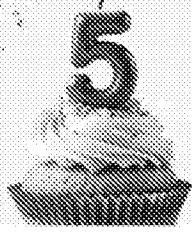
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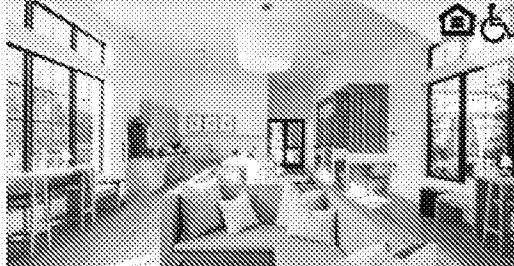
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Abbott pushes back against protester disrupting parental empowerment event

By Anthony Blankley | The Center Square contributor | May 4, 2023



Citizen House MLK, a residential development in Houston, Texas, where a protester was removed by security personnel during a parental empowerment event with Gov. Greg Abbott.

Photo: The Center Square

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(The Center Square) — Texas Gov. Greg Abbott responded this week to a protester who disrupted a parental empowerment event at the ROCK Church in Houston, Texas, saying protesters were "trying to silence the voices of parents in this state."

The protester, an open borders advocate, was forcibly removed from the auditorium. Members of the audience, who were primarily Black residents of Houston, shouted, "God bless you," and "Jesus loves you," and gave the governor a standing ovation.

The governor spoke at the ROCK Church as part of a statewide effort he's undertaken to explain a key legislative priority of his, school choice. A parental rights and school choice bill already passed the Senate and has yet to pass the House.

Marilyn Burgess District Clerk



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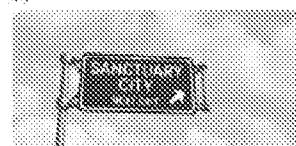
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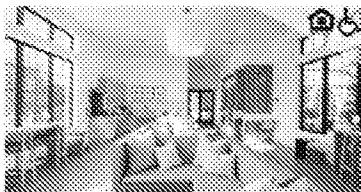
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Abbott called on parents to get involved, arguing their voice mattered and they could be a part of bringing school choice to Texas.

Toward the beginning of the governor's remarks, Cesar Espinosa, executive director of FIEL Houston, stood up and yelled, "You're a traitor... You gotta go. You call people illegal, and they're not. Gov. Abbott, get out!"

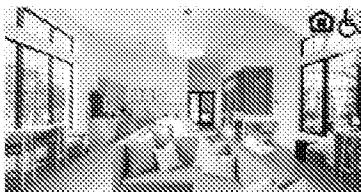
FIEL Houston, "an immigrant-led civil rights organization," supports open borders and taxpayer funding of education and other services for children and adult foreign nationals who've entered the U.S. illegally.

Espinosa also pushed back against law enforcement who forcibly removed him from the auditorium. Law enforcement officers told The Center Square he wasn't arrested.

Unmoved by the disruption and appreciative of the support from the audience, Abbott said, "Here's the way this works. Here's what they know. They are trying to silence the voices of the parents of this state."

Several news organizations reported that Espinosa was referring to five Hondurans who were murdered last week in Cleveland, Texas, although he didn't mention them. According to the local sheriff's office, 10 Hondurans lived in the home. Several reports indicated nine were illegally in the country. In an official statement announcing a reward for assistance with the capture of the Mexican felons who'd been previously deported, the governor's statement said the victims were "five illegal immigrants."

Abbott regularly publishes statements about foreign nationals who are in the U.S. and Texas illegally, in violation of federal law, referring to them as "illegal immigrants" or "migrants."



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Under § U.S. Code, which governs legal and illegal entry into the U.S., it is a crime to bring in and harbor certain "aliens," which is the legal term for any person who isn't a citizen of the United States. Title 8 states that anyone who, "knowing that a person is an alien, brings to or attempts to bring to the United States in any manner whatsoever such person at a place other than a designated port of entry or place other than as designated by the Commissioner, regardless of whether such alien has received prior official authorization to come to, enter, or reside in the United States and regardless of any future official action which may be taken with respect to such alien; knowing or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, transports, or moves or attempts to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law; encourages or induces an alien to come to, enter, or reside in the United States, knowing or in reckless disregard of the fact that such coming to, entry, or residence is or will be in violation of law." Depending on the type of violation, penalties vary between five and 20 years in prison.

Ban sanctuary cities?

Louisiana is the most recent state to advance legislation that would ban sanctuary cities for migrants. Should sanctuary cities be banned in your state?

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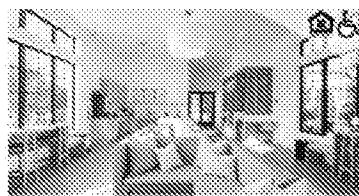
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Abbott, a former Texas Supreme Court justice and former Texas attorney general, has repeatedly called on President Joe Biden to enforce it. He's also raised concerns about the abuse and treatment of unaccompanied minor children who have allegedly been trafficked into the U.S. through the southern border.



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Florida Gov. Ron DeSantis was so concerned by the federal government funding and orchestrating flights of children throughout the country and into Florida that he asked the Florida Supreme Court to impanel a grand jury to investigate. The grand jury recently released part of its findings, which outline "horrible atrocities inflicted on immigrant children in Florida and elsewhere who are under the authority of the Biden administration and nonprofit organizations receiving taxpayer money," Florida Attorney General Ashley Moody said.

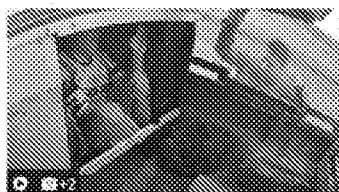
Allegations from the report "include the federal government losing track of more than 20,000 children, no background checks on the minors' sponsors, human trafficking and child abuse," she said, which is why she's called on Congress to investigate the alleged trafficking of children through the southern border.

Many elected officials, law enforcement officers and citizens have argued there'd be less crime involving foreign nationals in America if federal law were enforced and illegal entry was prevented and had consequences instead of encouraging it.

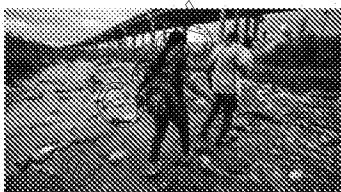
There's also a movement among Texans to prohibit foreign nationals who are illegally in Texas from receiving in-state tuition at Texas colleges and universities. HB 3280, filed by Rep. Fern Liao-Wilson, B-Galveston, a retired teacher, would amend the education code to prevent those who aren't authorized to be in the U.S. under federal statute to be considered a resident of Texas to apply for in-state tuition. Her bill has yet to be scheduled for a hearing.

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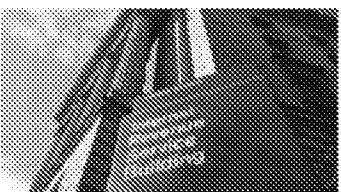
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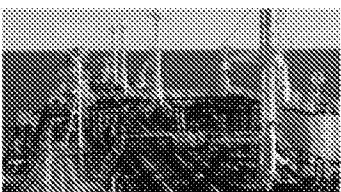
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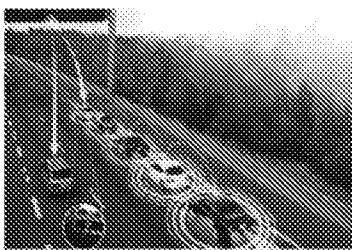


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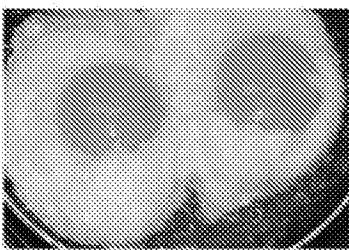


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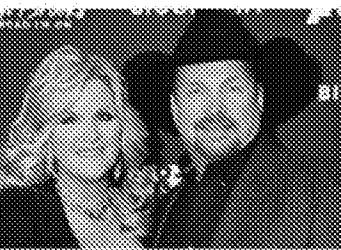
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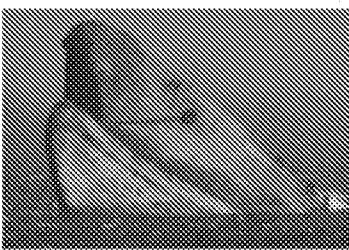
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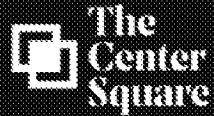
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FIEL Houston 🇮🇹 @FIELHouston · Apr 25

Unfortunately yesterday was not the first time that Abbott has used the #DPS to be violent against peaceful student protestors. In 2016 white nationalist Richard Spencer gave a speech at TEXAS A&M which the student body opposed.



2:09



4



6



6



433



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FIEL Houston 🇮🇹 @FIELHouston · Apr 25

He called is the DPS to protect the racist and kick us out. Abbott is a violent racist Facist man. We stand with student organizers! #freepalestine



2



60



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Fiel Houston
May 2, 2023 · 3

...



FIEL Houston

@FIELHouston

...

No time for political pandering let's focus on catching the murderer.
Shame on you @GregAbbott_TX

...



Greg Abbott • @GregA... · 21h

I've announced a \$50K reward for info on the criminal who killed 5 illegal immigrants Friday. Also directed #OperationLoneStar to be on the lookout.

...

I continue working with state & local officials to ensure all available resources are deployed to respond.

...

[Governor Abbott Announces \\$50,000 Reward For Information On Cleveland Shooter](#)



Fiel Houston
May 1, 2023 · 3

...

No hay razón de enfocarnos en la nacionalidad de las víctimas o del tirador ni importa su estatus migratorio. Lo importante en estos momentos es que el criminal... [See more](#)

...

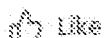
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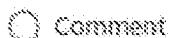


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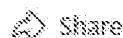
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Fiel Houston
June 22, 2023

xxx



Fiel Houston was live
June 22, 2023

● ● ● Información sobre la continuidad del TPS (II)

See Translation



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EXHIBIT CC



Fiel Houston
July 18, 2023 · 6

...



Gov. Abbott
You can't be pro-life literally be
"pro-life" and at the same time
purposely put immigrant lives
(including children) in danger
#ImmigrantLivesMatter



@FIELHOUSTON



Fiel Houston
July 18, 2023 · 6

El gobernador está poniendo las vidas migrantes en peligro a propósito.

[See Translation](#)



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