



CENTRAL AMERICAN RESOURCE CENTER
CENTRO DE RECURSOS CENTROAMERICANOS

May 4, 2026

Ms. Justine Fuga
Associate General Counsel
Office of the General Counsel
Executive Office for Immigration Review
5107 Leesburg Pike, Suite 2600
Falls Church, VA 22041

Submitted via email to EOIR.PRA.Comments@usdoj.gov

Re: Comment in Response to Agency Information Collection Activities,
Change of Address/Contact Information Form, OMB Number 1125-0022,

Dear Ms. Fuga:

The Central American Resource Center of Northern California (CARECEN SF) expresses its concerns about EOIR's plan to remove the "In care of" address field from Form EOIR-33/IC and Form EOIR-33/BIA.

Founded in 1986, CARECEN SF serves low-income, immigrant families in the San Francisco Bay Area. Among other programs, we provide free and low-cost legal representation to families, single adults and unaccompanied children. We represent clients in affirmative and defensive proceedings, including detained individuals. We practice before USCIS, EOIR, the Board of Immigration Appeals (BIA), and the Ninth Circuit Court of Appeals; we also represent children in probate and family court. We are a member organization and the fiscal lead of the San Francisco Immigrant Legal Defense Collaborative, a group of 16 local non-profit organizations engaging in removal defense. Our immigration legal team – consisting of seven attorneys, two partially accredited representatives, three paralegals, and one legal assistant -- provides limited and full-scope services to approximately 2,500 people per year. At the current time, we represent hundreds of individuals with cases for asylum and other humanitarian claims. Our practice also encompasses Special Immigrant Juvenile Status (SIJS), U and T nonimmigrant status, cancellation of removal, Temporary Protected Status (TPS), Deferred Action for Childhood Arrivals (DACA), stays of removal, motions to reopen, family petitions, consular processing, adjustment of status, naturalization, and other applications for relief and benefits. The great majority of our clients are Latinx, low-income, and monolingual Spanish speakers. Some of our clients speak indigenous languages from Guatemala and Mexico, and we represent Afro-descendent Central Americans. Many of our clients have limited formal education. Some have none at all. We also represent people with varying physical and mental disabilities, including but not limited to blindness, deafness, and posttraumatic stress disorder.

In addition to our volume of represented cases, CARECEN SF assists a large number of pro se respondents with information, orientation, and assistance with pro se filings. Of all those pro se filings, helping individuals complete an EOIR-33 is by far the most common.

A significant percentage of the people we serve cannot reliably receive mail at the place where they reside. A large number of them are in shared living situations, where they rent a room in a house or apartment occupied by multiple individuals or families. They are in a very vulnerable position -- at the mercy of someone else, who they know little and trust less, to collect the mail and distribute it to them. Others live in places where mailboxes are frequently vandalized; recently, a client told us of finding mail strewn on the sidewalk. We also work with many people who are living in a shelter, or in their car, or who are moving between friends and relatives while looking for stable housing.

For all of those people, being able to receive mail in the care of a trusted relative or friend makes all the difference. When helping pro se respondents and represented clients fill out a Form EOIR-33, they commonly tell us that an "in care of" address is far more reliable. Without that option, pro se individuals would be at substantially higher risk of missing important correspondence for their cases before EOIR.

This worry is especially acute given that the main courthouse location in San Francisco closed down as of May 1, 2026.¹ Thousands upon thousands of cases will be transferred in the near future, each with a new location and presumably a new hearing date. Based on our recent experience and the lack of Immigration Judges to hear those cases, we expect it will take months to complete the reassignments and send out corresponding notices. If people do not receive those notices, there is a high risk of them inadvertently missing a hearing and getting ordered removed in absentia.

The form change is justified by fears -- unsupported by any evidence -- that "nefarious" actors will steal respondents' case correspondence, which "often include sensitive information about the subject, including photocopies of government-issued identification, tax return forms (which include social security numbers), marriage licenses, and birth certificates." This reasoning does not withstand scrutiny. First, the documents listed are those which are typically filed by respondents, not those filed by DHS and served on respondents. In our experience, it is exceedingly rare for DHS to file a tax return or an identity document with the Court. Second, the "nefarious" parties which our clients are worried about are most often in the place where they live, not the trusted relatives or friends that they designate to receive their mail.

There are other reasons as well as to why the loss of the "in care of" line will be hurtful. For example, it will potentially jeopardize the ability of survivors of abuse to maintain a confidential address. USCIS forms recognize that by allowing for a safe mailing address, in addition to including an "in care of" option for mailing addresses.

We see no emergency that would warrant rushing out new EOIR-33/IC and EOIR-33/BIA forms without the normal notice and comment period. It would appear that any sense of urgency would be coming from the desire to locate people at their homes and arrest them rather than the desire to ensure that they receive case correspondence. The term "contact information" is in the title of Forms EOIR-33/IC and EOIR-33/BIA, and appears multiple times in the text at the top of each form. It is reasonable to expect that the primary utility of each form is for exactly that -- being able to contact individuals who are in proceedings.

¹ That location -- at 100 Montgomery Street in San Francisco -- has closed down for hearings, although court staff are still present and the filing window is still open.

Thank you for your attention.

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Laura Sanchez
Legal Director
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