

Of Radicals and DREAMers: Harnessing Exceptionality to Challenge Immigration Control

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Abstract

This article contributes to the literature on undocumented youth activism and citizenship by assessing undocumented youth's challenges to a growing regime of migration control in the US. It uses Doug McAdam's tactical interaction as an analytical lens to explore two consecutive high-risk campaigns, ICE infiltrations and expulsion/re-entry. In this subset of activism, undocumented youth have directly taken on technologies of migration control by forcing the state to adjudicate their status through direct action protest; they have exposed state abuses of law by infiltrating detention centers and have subverted deportation by seeking humanitarian aid and re-entry. Undocumented youth use their liminal legal status and their valorized social status to access and launch their challenges from these invisible spaces of migration control. In doing so, I argue, they are challenging the contours of citizenship and destabilizing the state's power to police and criminalize the unauthorized. Assessing these challenges is especially timely given that political movements are expanding their tactics to challenge punitive enforcement measures that states are implementing to control these "illegal" and "expelled" populations.

Introduction

In the summer of 2013, the National Immigrant Youth Alliance (NIYA) unveiled its latest campaign to challenge US enforcement practices. On the NIYA website, a timer counted down to the zero hour when activists would embark on their action. Short video testimonials released by the organization provided more insight into NIYA's newest strategy. They told the heartbreaking personal stories of undocumented youth who had not seen their families or returned to their birthplaces in Mexico for most of their lives. That was, until now. "My name is Marco," began one of the testimonials, "and if you're watching this, I am currently in Mexico" (NIYA, 2013c).

Marco Saavedra and eight other undocumented activists, some who had repatriated and others who had "self"-deported for the action, were in Mexico. They were attempting to openly re-enter the United States in order to challenge the Obama administration's unprecedented record on deportation. It was activists' riskiest strategy to date. "I know you are going to think I am crazy for doing this," said Lizbeth Mateo in her video testimonial, "for leaving the US and coming to Mexico" (NIYA, 2013a). By returning to Mexico without cover of US citizenship, activists risked *not* being allowed to re-enter the US and remaining in Mexico. And yet activists and organizers were confident in NIYA's capacity to rally enough support and to secure activists re-entry and that they embarked on the action. "Mama, papa," Lulu Martinez said fighting back tears in her video clip, "vamos a regresar. I am going to come home...I am going to come home" (NIYA, 2013b).

On July 22, 2013, when NIYA's timer had counted down to the zero hour, Marco, Lizbeth, Lulu and six other undocumented activists clad in graduation caps and gowns marched to the Mexico-US border to turn themselves over to immigration officials and to attempt to cross back into the US. The face-off between undocumented youth and the state had begun.

NIYA's Bring Them Home (BTH) campaign highlights a subset of undocumented youth activism that directly and unapologetically challenges the US's formidable migration control regime (Meissner, Kerwin, Chishti, & Bergeron, 2013). In a familiar strategy, activists donned caps and gowns to signal their exceptional status as high achieving, young people whose lives were in limbo to make their protest resonate and to secure their safety. Activists also used an embodied form of protest to target US technologies of migration control (McDowell & Wonders, 2010); they subjected their bodies to state control (deportation) as a basis for their broader challenge. BTH, along with a subset of the We Will No Longer Remain in the Shadows campaign that preceded it, however, departed from earlier direct action tactics by requiring activists' to enter into invisible spaces of migration control to launch their challenges (detention centers and expelled outside of the US). While there is

a growing literature on undocumented youth activism, it has yet to examine this escalation in tactics.

This article helps to fill this void by examining this subset of activism, in which undocumented youth have directly taken on technologies of migration control by forcing the state to adjudicate their status through direct action protest. In doing so, I contribute to the literature on citizenship and activism by showing that through these campaigns activists are challenging the contours of citizenship and destabilizing the state's power to police and criminalize the unauthorized. Additionally, I highlight undocumented youth activists as strategic and interactive in their efforts to challenge and dismantle migration control technologies by showing that activists use their liminal legal status and their valorized social status to access and launch their challenges from these invisible spaces of migration control.

Undocumented Youth Activism, Citizenship, and the Challenge to State Power

Scholars from a variety of fields have been interested in the relationship between citizenship and the political activism of immigrants and refugees. At issue are the political rights that are granted (or not) by the state and those that are "taken" (or not) by immigrants (Beltrán, 2009; Honig, 2003; Nyers, 2010). Rather than defining citizenship simply as legal status, citizenship is conceived of as multi-dimensional, including legal status, a collection of rights, political activity, and collective identity and belonging (Bosniak, 2000). Undocumented immigrants' political activism repositions citizenship; by acting politically, the undocumented affirm their rights to make claims against the state and to their membership in the nation despite their lack of formal legal status.

Immigrants more generally, and the undocumented in particular, challenge legally based notions of citizenship by subverting the link between legal status and political rights (Beltrán, 2009; Glenn, 2011; Nyers, 2010). In this challenge to the state, immigrants and refugees are participating as democratic subjects by raising their political voices and making themselves visible in public and governmental spaces (Beltrán, 2009; Nyers, 2010). Noncitizens can actively practice their citizenship through their political participation. Indeed, through their mass participation in the immigrant rights *mega-marchas* of spring 2006 (Gonzales, 2009), noncitizens were said to have "experienced a richer and more expressive instance of citizenship than the vast majority of their legally sanctioned counterparts" (Beltrán, 2009, p. 598). Whether lobbying governmental officials, demonstrating at marches, or participating in civil disobedience, it is the practice of politics that is central to this dimension of citizenship. Scholars have also paid attention to the content of political activity and claim making and the ways that it shapes membership and belonging. In this regard, political participation has been shown to challenge or support narrow state-based definitions of citizenship.

The strategic framing of claims and the disciplining of the performance of political activity have helped to cast select migrants as deserving of citizenship based on hegemonic models of "good" citizens. Advocacy organizations, immigrants, and their allies have contributed to constructions of migrant un/deservingness by using state-based, normative constructions of citizenship to frame their claims to legal status and to shape political activism (Baker-Cristales, 2009; cf. Nicholls, 2013; Unzueta Carrasco & Seif, 2014). During the immigrant rights *mega-marchas* the media, advocates, and activists contributed to binaries that cast some immigrants as deserving and others as undeserving of citizenship when they drew on these models of citizenship in their discursive framing of claims (we are not criminals; we are not terrorists) and in their disciplining of protesters (wear white t-shirts, wave American flags) (Baker-Cristales, 2009; Lara, Greene, & Bejarano, 2011). The activism of undocumented youth has been especially criticized for its contribution to upholding state constructions of migrant deservingness and undeservingness.

The DREAMer archetype was produced through the early efforts of federal and state immigrant rights organizations working with undocumented youth to pass the DREAM Act (Nicholls, 2013). Immigrant rights organizations needed to devise a messaging strategy that would make undocumented youths' claims to membership legible to elected officials and the public at large; undocumented youth needed to be removed from the stigma of "illegality" and re-imagined as members so that their claims to legal status would be heard (Nicholls, 2011). This archetype has been used to discursively frame youths' claims and to shape the performative aspect of protest (caps and gowns) in a variety of their political actions. Such discursive framings and the managing of protest reinforce normative framings of citizenship that divide migrants into criminals and non-criminals, terrorists and non-terrorists, and DREAMers and non-DREAMers; in short, migrant criminality versus migrant

exceptionality. This activism, however, also has its counterpart. Scholars have identified how migrant activism can also challenge the state and its restrictive definitions of citizenship (De Genova, 2010; Unzueta Carrasco & Seif, 2014).

Activists have attempted to untether the link between legal status and membership by challenging constructions of migrant deservingness through their discursive framing and political activism. In some instances, migrants have sidestepped the question of legal status and membership altogether. During the 2006 *mega-marchas*, migrants were not only making claims for legalization they were also challenging the state's power to stop global migration flows and to expel the undocumented (De Genova, 2010). Through political chants that dared the state to expel them with concomitant promises to return ("*aquí estamos y no nos vamos, y si nos echan nos regresamos*"), migrants were asserting their power to stay in the nation or return even if expelled. In this regard, migrants were not asking to be "let in" to the category of deserving citizens, rather they were sidestepping the category altogether asserting their presence within the nation outside of formal state recognition. In other instances, activists attempted to expand narrowed constructions of hegemonic citizenship.

While some activists were committed to upholding the DREAMer archetype, others have complicated this archetype by including multiple and intersectional migrant identities in their discursive framing and in their activism (Nicholls, 2013; Unzueta & Seif, 2014). Rather than adhering strictly to the overachiever identity, young activists have come out as queer and as part of a broader and intersecting community of undocumented people in the US (Beltrán, 2015; Zimmerman, 2012). Undocumented youth and young adult activists have also challenged advocates' narrow framing of DREAMers by aligning themselves with the "undeserving" in their activist work (Nicholls, 2013; Unzueta & Seif, 2014). The Immigrant Youth Justice League, for example, disrupted constructions of deservingness by organizing around the "less-deserving," "criminal" and poor migrants, in their anti-deportation work (Unzueta Carrasco & Seif, 2014). In doing so, activists have begun expanding the boundaries of citizenship to include those cast as undeserving.

Overall, scholars have shown that citizenship is a site of contestation via migrant political activism. Such activism can reposition citizenship by untethering the links between legal status and political rights, it can also support and/or challenge hegemonic constructions of membership that are linked to legal status. This happens at the same time that political participation can seek formal recognition for migrants on one hand, or target the state's regime of migration control on the other. My analysis contributes to this literature by moving beyond an interrogation of political rights and of deservingness and membership as the central terrain on which undocumented youth reposition citizenship; I not only consider citizenship as a site of contestation, but also as a tool in contestation.

I examine two consecutive high profile and high-risk campaigns that target migration control—a subset of the We Will No Longer Remain in the Shadows (Shadows) campaign and the Bring Them Home (BTH) campaign. As a component of the Shadows campaign activists infiltrated Immigration and Customs Enforcement (ICE) detention centers to challenge the escalation in the detention of the unauthorized, the conditions and abuses in these detention centers, and the failures in stated US policy to detain and deport only "high priority" cases. In the BTH campaign, activists attempted re-entry from Mexico to challenge the US's record on deportation, the separation of families (either via deportation or undocumented status) and the policies that supported this escalation in expulsions. I draw on Doug McAdam's (1983) concept of tactical interaction to situate undocumented youths' activism within a context of state power and of dynamism in activists' efforts (tactics and discursive framing) to challenge the state's enforcement technologies.

McAdam (1983) argues that insurgents must consistently devise tactics to offset their powerlessness against more powerful opponents; their opponents in turn, will work to neutralize the effectiveness of activists' new tactics in order to maintain their power. As a result, insurgency is "influenced by (a) the creativity of insurgents in devising new tactical forms [tactical innovation], and (b) the ability of opponents to neutralize these moves through effective tactical counters [tactical adaptation]" (McAdam, 1983, p. 736). Following McAdam, I trace youths' tactical innovations across two consecutive campaigns to devise more effective tactics to confront the state and its prerogative to control migrants, highlighting their strategic use of citizenship as a tool and site of challenge. In doing so, I complicate the role of undocumented youth activism in repositioning citizenship.

Activists' use of their construction as more deserving is central to their activism; by subjecting their more valorized bodies to state enforcement practices and technologies, youth are using state constructs of citizenship

(their deservingness) to challenge the enforcement apparatus that these constructs (migrants' undeservingness/criminality) help to underwrite. Activists are destabilizing the state's power to control migrants by compelling the state to suspend their own legal status in response to their strategic and forced confrontation with the state's enforcement apparatus. It is through these high profile and high risk efforts that activists are attempting to untether the link between legal status and the right to enter and stay in the nation, as well as the corollary right to be free from state control and violence.

Undocumented youth have developed a strong and disciplined public media campaign, and it is this public face that I am interested in in this article. As such, I draw materials from the public faces of the Shadows and BTH campaigns, including publicly available videos, documents, and social media websites. This includes YouTube videos, action alerts, and articles for each campaign and available through organizational websites, Facebook pages, and the Internet more generally. I also analyze outside sources documenting the interaction between those in the movement and those outside of the movement. This includes newspaper and other media sources' accounts of and responses to these campaigns, as well as elected officials' press releases and public announcements on key policy changes or on the campaigns. Before moving into these campaigns, I outline youths' positioning in the United States; a position, I argue, youth leverage in the face of a punitive and massive enforcement regime to launch their challenges.

Setting DREAMers Apart: Liminal Legality and Social Valorization

A select segment of undocumented young people have secured a privileged position within the US's citizenship hierarchy and relative to the US's enforcement apparatus. This position combines a liminal legal status (Menjívar, 2006) alongside a valorized social status. In this regard, DREAMers, have been made exceptional relative to the criminalized undocumented masses.

DREAMers exist in a legal grey area; while they have been afforded policy protections against deportation through the Morton Memo and through Deferred Action for Childhood Arrivals (DACA), they are still undocumented with few avenues to regularize their status. On June 17, 2011 the Director of ICE, John Morton, issued a memorandum that stipulated that immigration officials use their prosecutorial discretion to focus on high priority cases for apprehension, detention, and removal. "ICE must prioritize the use of its enforcement personnel, detention space, and removal assets," the memo stated, "to ensure that the aliens it removes represent, as much as reasonably possible, the agency's enforcement priorities" (Morton, 2011). The Morton Memo identified these enforcement priorities as threats to national security, border security, and public safety. It also singled out special classes of individuals who warranted particular care in not "assert[ing] the full scope of the enforcement authority available to the agency." This included "individuals present since childhood" (Morton, 2011). The Morton Memo assured undocumented youth that, as lower priority cases, they would not be caught up in the dragnet of the detention center or deportation systems. These protections were further institutionalized through DACA.

Almost one year later on June 15, 2012 Secretary of the Department of Homeland Security Janet Napolitano announced that, "certain young people who were brought to the United States as young children, do not present a risk to national security or public safety, and meet several key criteria will be considered for relief from removal from the country or from entering into removal proceedings... and will be eligible to apply for work authorization" (DHS, 2012). DACA provided undocumented youth who fit certain criteria two-year work permits and halts on deportation. Napolitano sent a memorandum to the Directors of the different immigration offices housed within DHS further stipulating that prosecutorial discretion be used in the apprehension, detention, and removal of DACA-eligible undocumented youth. In the memo Napolitano (2012) outlined the rationale for the protection of young people.

"Our Nation's immigration laws," she said, "are not designed...to remove productive young people to countries where they may not have lived or even speak the language. Indeed," she reasoned, "many of these young people have already contributed to our country in significant ways." She further conceded that DACA eligibility "be considered whether or not an individual is already in removal proceedings or subject to a final order of removal" (Napolitano, 2012). These protections against detention and expulsion partly reflect, but also institutionalize, the exceptional social status of DREAMers.

Alongside their legal liminality, DREAMers are also socially valorized relative to other immigrants. The DREAMer archetype casts the innocent, high achieving student as the exception to the broader construction of the criminalized undocumented immigrant. While its construction was aided by the early efforts of federal and state immigrant rights organizations working with undocumented youth to pass the DREAM Act (Nicholls, 2013), it has been supported and reified by politicians, the media, and the undocumented as well. This archetype is cast in relation to and reinscribes the criminality of other groups—undocumented adults, young men and boys of color, and non-gender conforming youth. Moreover, this archetype has staying power. It has persisted even in the face of efforts on the part of some undocumented activists and allies to challenge or dismantle it (Beltrán, 2015; Nicholls, 2012; Zimmerman, 2012).

A select segment of undocumented youth and young adults have been set apart, legally and socially. Rather than supporting or challenging these constructs through their activism, I investigate how some undocumented activists are strategically leveraging this unique positioning to buttress their tactics, press their claims, and to challenge the state and its policing of the undocumented community.

Challenging the System from Within: Detention and Deportation, Infiltrations, and Re-Entry

The Shadows and BTH campaigns followed in a longer line of direct action activism. Young people were increasingly subjecting their “illegal” bodies to the US’s enforcement apparatus. In the initial move to civil disobedience, local police were forced to manage activists’ undocumented status by deciding whether to release activists or to funnel them through the state’s detention and deportation machinery. In the escalation of Shadows and in the BTH campaigns activists intensified this embodied strategy, launching their challenges from within these invisible spaces of migration control, rather than attempting to evade them. As such they forced the state to adjudicate their legal status from inside its enforcement apparatus. In other words, whereas most undocumented migrants’ lived experience entails a constant maneuvering and evasion of spaces of migration control a subset of the Shadows activists and the BTH activists strategically chose these sites, detention and deportation, as the basis from which to mount their challenges to the state apparatus.

We Will No Longer Remain in the Shadows: Escalating to ICE Infiltration

On November 10, 2011, twelve activists set out on Alabama’s streets in the hopes of getting arrested and transferred to a federal immigration detention center. Organizers chose Alabama for the initial action because its state legislature had recently passed House Bill 56, the most punitive and restrictive anti-immigrant policy in the country; it included provisions for schools to check the immigration status of students, required police to arrest anyone they suspected was undocumented, and even criminalized citizens who drove someone who was undocumented. Additionally, a range of activists had organized a broad based series of actions to protest Alabama’s new law, all meant to empower the immigrant community in the face of the punitive bill (Hing, 2011; Vasquez, 2011). It was within this context that the first ICE infiltrations were carried out.

Two of the twelve activists—Isaac Barrera, 20, and Jonathan Pérez, 24—were arrested and transferred to a Louisiana federal detention facility. Four others—Jesus Barrios, Felipe Baeza, Sonia Guinansaca, and Reyna Wences—were charged with criminal trespassing and disorderly conduct and were incarcerated for two and a half days (NYSYLC, 2012). After approximately one week, activists rallied to secure Isaac and Jonathan’s release. The pair had spent more than two weeks in custody before being released.

When the action went public, Jonathan and Isaac stood as the embodiment of the administration’s political failure to detain only high priority cases. “ICE keeps on saying they don’t deport DREAMers or low-level offenders,” Jonathan told reporters, “but that same day [as the Tuesday action] we were transferred to this detention center....We have the paperwork. We’re in deportation proceedings” (as quoted in Hing, 2011). Their DREAM Act eligible status was integral to the action, not only should they have been the lowest of the low priority cases, as DREAMers they had the political capital to secure their release and for their challenge to be heard.

With the success of the test action (in securing release, although not in getting the bulk of participants

in detention) proving the viability of this tactic, organizers expanded their efforts. This time, they would launch their attack directly against the federal government without using a protest campaign against a punitive state policy as an intermediary. Additionally, empowered by their ability to effectively move in and out of the detention center, activists would lengthen their stay on the inside in order to organize from within the detention center space.

In July of 2012, Marco Saavedra and Viridiana Martinez infiltrated Broward Transitional Center, a private detention center in Florida that had been heralded by the administration as a model center for the detention of non-violent unauthorized immigrants—precisely the migrants that the Morton Memo was intended to “protect” (May, 2013). Unlike the initial test action, Viridiana and Marco stayed in Broward for several weeks with the task of clandestinely organizing detainees. During this time they collected cases, compiling the names and information of individuals that should not have been detained. They then passed this information to a support team on the outside that would then organize to secure these detainees’ release. Activists on the inside also passed out an informational hotline to aid detainees in securing their own release. The ICE infiltration implicated undocumented activists in directly attempting to secure the release of as many detainees as possible—a further expansion of their activist work.

These shadows activists were attempting to expose what was going on behind closed detention center doors in order to hold the administration accountable. “We want to reveal the truth,” Jonathan told a reporter, “and show [Immigration and Customs Enforcement] for what they really are, as a rogue agency which has no accountability while they separate families” (as quoted in Hing 2011). Compiling this information shed light on who was being detained and on the conditions within the detention facility. This provided activists with solid evidence to expose the administration’s failure to comply with the Morton Memo and its assurances that it was targeting low priority cases. Activists’ claims against the administration were upheld when more information came to light documenting that less than half of those detained and deported were “high” priority cases (Rosenblum, Meissner, Bergeron, & Hipsman, 2014).

Activists were infiltrating detention centers to challenge US detention practices by exposing the political failure of stated US policy to detain and deport “high priority” cases. Their liminal legal status and their valorized social status were central to this challenge. Activists used their political capital to expose who was being detained and the conditions detainees faced in detention centers, and to secure their release by moving into and out of the detention center space. Their challenges, however, did not go unchecked.

In a tactical adaptation on the part of the state activists’ challenge could be recast as a strictly legal challenge to *reform* detention practices by ensuring more accurate practices of identifying and detaining high priority cases. The administration followed in this reformist logic. The Obama administration was improving its record by shifting the balance between high and low priority cases detained and expelled (Rosenblum, Meissner, Bergeron, & Hipsman, 2014). And yet, high priority cases still comprised less than half of those detained. Additionally, with the announcement of DACA undocumented youth and young adults (those valorized subjects) were offered further protections, an institutionalized guarantee against deportation. This aided in reinforcing the exceptionality of undocumented young people, while keeping the system and its logic intact. While activists were able to make their political case, the logic that coupled legal status with state control remained intact for all but a select segment of the population. Despite activists’ efforts, then, the logic of detention was not weakened. As a result, detention as a practice while reformed was also reified.

It is important to recognize, however, activists’ challenge to the state and its power to police the unauthorized through the ICE infiltrations. In this tactical innovation undocumented activists leveraged their liminal legal and valorized social status to successfully move into and out of the state’s enforcement apparatus and they attempted to do the same with detainees. Moving out of detention was also an important aspect of activists’ challenge because they forced the state to suspend their legal status. While governmental officials could explain such a suspension under cover of the Morton Memo, this action showed that undocumented youth had the power to challenge the state and its logic of security and sovereignty in the policing of migrants that up to that point seemed immune from challenge. They did this despite not having legal status, and in fact because of it.

In their next campaign (tactical innovation), undocumented youth shifted their strategies. Activists continued their anti-deportation organizing by infiltrating ICE detention centers, aiding detainees with their individual cases, and organizing them to launch their own protests within detention center spaces. But, they also moved

away from a basis in the Morton Memo and low priority cases. Activists launched a moral challenge to the government's record deportations and moved further along the state's enforcement apparatus: being expelled to Mexico and openly attempting to re-enter the US.

#BringThemHome: Subverting Deportation

On July 22, 2013, Marco, Lizbeth, and Lulu, who were introduced at the beginning of this article, along with six other undocumented activists attempted to re-enter the United States. The DREAM 9, as the initial group of activists was dubbed, were placed into a federal immigration detention facility in Eloy, Arizona. During their time in detention, Lulu and Maria Peniche were held in solitary confinement for ten days. The pair had jumped up during dinner, provided detainees a hotline to seek pro-bono legal services, and yelled out a signature chant of the movement "undocumented and unafraid;" detainees joined them by chanting and pounding on the tables (Bogado, 2013b; Cereijido & Bishop, 2015). Maria was placed on suicide watch as a result of her time in solitary confinement. "You feel like the world has forgotten about you," she said in a recording from detention released by NIYA, "I was gonna hurt myself. Too much anxiety. Too much fear. Too much anger at this entire mess. I just wanted to slam myself against a wall or put boiling water on my hands so I could feel some kind of pain or something different," (as quoted in Bogado, 2013b; NIYA, 2013d). Maria and Lulu's experiences sparked a public campaign against their confinement, and more broadly against using such practices in detention facilities. Altogether the DREAM 9 spent more than two weeks in detention before being released into the US pending resolution of their cases.

BTH introduced a moral challenge to governmental control policies and the Obama administration's record expulsions. By linking activists' stories of family separation to state control policies, organizers attempted to shift the narrative around expulsion from a governmental prerogative to a moral failure. Activists' DREAMer status was also integral to this campaign. They had the social and political capital to make their discursive framing of expulsion and family separation resonate publicly and to help secure their re-entry back into the nation.

BTH used the DREAMer archetype to make the inhumanity of separating families, whether through deportation or through undocumented status, more politically legible and socially distressing to the general public and to the administration. Lizbeth Mateo told viewers that risking her livelihood in the US by returning to Mexico was crazy, but "it's crazier," she argued, "that I had to wait fifteen years to see my family" (NIYA, 2013a). When Lulu Martinez directs her message to her parents promising to return, "Mama, papa, I am going to come home," (something that is presumably out of her hands) she is linking her act of wanting to reunite with her family with the countless others who had been deported under the Obama administration (NIYA, 2013b).

Activists used the DREAMer archetype as a hook in a broader moral challenge to the state's enforcement practices framed discursively as keeping families apart. By donning caps and gowns the DREAM 9 forced the moral upper hand, reminding the public and the administration of their exceptional status and also putting a valorized face to the invisible masses of deportees and their separation from their families. "I did it not just for my own family," Lizbeth tells us, "But, I did it for the families that have been deported." The 1.7 million that were deported, Lizbeth says, "...are 1.7 million families...like mine" (NIYA, 2013a). To further make the point, NIYA's video clip echoes these words and then blasts "1.7 Million. Families Like Mine," as boldfaced text on the screen. It is activists' embodiment of the valorized DREAMer who is being subjected to US enforcement practices (the inability to return/stay) that helps to make the moral claim regarding family separation, and then extends that claim to the rest of expelled population.

With the success of this initial action (the re-entry of the DREAM 9), organizers were again empowered to expand their tactics. The initial round of BTH activists, the DREAM 9, fit within DREAMer archetype heralded by the administration and most of them would have been eligible for DACA, although a number had repatriated before Obama's executive order went to effect (Bogado, 2013a). In the next re-entry action organizers expanded the numbers and "types" of undocumented with each escalation in this campaign, putting their calls for the return of the 1.7 million undocumented that had been deported under the Obama administration into action.

On September 30, 2013, approximately thirty DREAMers crossed at the Laredo, Texas port of entry. This group of activists, dubbed the DREAM 30, was a larger group that included an expanded role for parents

both as crossers and as activists in the US seeking the release of their family members. In March of 2014, in a major escalation of this tactic, over 150 undocumented activists crossed at a San Diego, California port of entry over three days. The Reforma 150, as they were called, included a much larger number of participants but also a further expansion in who participated; crossers included the more traditional DREAMers, but also low wage-workers, and undocuqueer activists. By the time of the Reforma 150, organizers had moved from highlighting the college-attending valedictorians to adults, the poor, and undocuqueer migrants. The caps and gowns were still used, but they aided in extending the cover of the DREAMer archetype while also contesting the restrictiveness of its protections.

Undocumented activists challenged the government's expulsion policies by attempting to circumvent them; participants attempted to re-enter the United States after having repatriated, "self"-deported, or (in later actions) been deported to Mexico. They used their exceptional status as a wedge to make and expand their claims to dismantle technologies of control. In order to contest these practices they linked their individual stories with the broader based surveillance and control of migrant communities, and they expanded the categories of migrants to be included under cover of "safety." As such, this campaign included a call to return the 1.7 million undocumented who had been deported since President Obama came to office.

The state also had cover in this action. Because activists sought re-entry through legal channels, the state's authority to arbitrate membership was upheld. Additionally, the government pushed back against activists. While the full DREAM 9 was allowed to re-enter, select segments of the DREAM 30 and the Reforma 150 were not. In doing so, the state again re-established the exceptionality of some of the undocumented over others by expanding its protections to some. Additionally, government forces were empowered by the public debate over this strategy among activists and their allies.

The DREAM 9 were openly criticized for reinforcing dividing lines of deservingness between them and their peers by playing into the DREAMer archetype of the innocent, high achieving student. The campaign was cast by some as irresponsible because it was not a viable or replicable avenue for the resolution of all deportee cases. NIYA was charged with being self-serving and only seeking to resolve the status of these nine activists (Nair, 2013). It was also criticized for organizing actions that did not fall in line with these youths' privileged status or with broader institutional tactics that relied on a disciplined image of "DREAMers" (Demby, 2013). These tactics polarized debates, critics argued, both within the immigrant rights community and in their efforts to bring others over to their cause (Demby, 2013).

Despite these tactical adaptations on the part of the state to neutralize the campaign, BTH activists contested the state's power to control migrants. Activists forced the state to suspend their legal status by moving into a space of expulsion (Mexico) and re-entering the nation. Additionally, they pushed the state to recognize the "rights" of less valorized migrants. They did this by linking their claims to the 1.7 million who had been deported and by expanding who participated in each round of the campaign. Through the re-entry campaign, then, activists challenged the link between legal status and the right to enter, to stay, and to re-enter the nation. It was a challenge to the enforcement apparatus altogether.

Perhaps one of the strongest indicators of youths' power was the successful re-entry of Elvira Arellano, the first undocumented migrant to seek sanctuary in a Chicago church during the mega-marches. Despite having a US citizen son and being a figurehead of the immigrant rights movement, Elvira was promptly detained and deported when she left the safety of the Chicago church to go to Los Angeles to speak to immigrant rights activists. Elvira re-entered the US with the Reforma 150. Given their creativity up to now, the next tactical innovation will be equally surprising and challenging. However, rather than turning our critical gaze only to youth activism, we would do well to turn that same gaze to the state and its tactical adaptations.

Challenging the State in Citizenship and Enforcement

The Shadows and BTH campaigns highlight undocumented youth's efforts to target and disrupt the state's power to police the unauthorized. Undocumented activists' liminal legal status and their valorized social status were critical components of each campaign. These challenges relied on undocumented activists subjecting their more valorized bodies to US enforcement practices, exposing these invisible spaces of control, and then using this valorized status to challenge enforcement practices—first through legal (reform) and then through

moral arguments (dismantling).

The Shadows challenge to detention rested on exposing the disjuncture between the government's policy pronouncements and its practices. Moving into detention, however, would only expose the administration's policy failures if activists themselves fell under the protections of the Morton Memo and if they had the political and social capital to make this challenge resonate. While there were others who also fit under the Morton Memo purview, it was these activists that had the political capital (policy protections plus being valorized socially) to effectively launch this challenge.

While activists were using the Morton Memo and their exceptional status to highlight the disjuncture between policy and practice, they were ultimately launching a broader challenge to detention and to those who were being deported. Shadows activists did this by making their challenge against the state public, but also directly by aiding detainees. Viridiana Martinez, one of the Broward activists, explained her participation in such a risky strategy, saying, "I told my mom. I told her on the phone. And she was like why are you doing that? And I was like, Mom, because it could be you. And it's not right that people go through this, you know?" (May, 2013). This part of their organizing was especially important in light of the escalation in detention and deportation under the Obama administration.

The BTH challenge to deportation launched a moral challenge to US policy calling into question the US's enforcement apparatus and the link between legal status and the right to enter and stay in the nation. The campaign launched a direct attack against the US's enforcement regime. NIYA makes this broader challenge to the escalation in deportation clearly in the postscript on the YouTube video clips it posted:

The Obama administration has created a deportation machine resulting in the destruction of over 1.7 million lives, and the devastating separation of those families by the border. Those 1.7 million people are not lost and forgotten; rather, they are people who deserve to have the choice to return to their home in this country. While we fight to dismantle the system of continued deportations, we must also fight to bring our community home. (NIYA, 2013a)

BTH simultaneously used and challenged activists' exceptionality; undocumented youth used their exceptionality to provide cover to them and others and they challenged their exceptionality by placing themselves back in line with 1.7 million undocumented immigrants that had been deported. Through the escalations, BTH pushed the boundaries of deservingness by calling for the return of the 1.7 million deportees, most of which did not fit the standard DREAMer archetype. In doing so, BTH challenged citizenship and deservingness as well as the link between legal status and the right to enter and to stay, and the corollary right to be free from state control practices.

Conclusion

Undocumented youths' tactical innovations provide insight into how the undocumented are challenging the components of citizenship by acting politically (de-linking legal status from political rights) and by calling for the right to stay for those who lack legal status (de-linking legal status from mobility rights). In the latter case, they are sidestepping legal status as the linchpin to rights—which, calls into question state enforcement practices and legality's association with full rights and freedom from state violence. Through their citizenship work (de-linking legal status from the right to stay) and their confrontation with (and wins against) the state's enforcement technologies, undocumented youth are also attempting to launch a challenge against the logic of the security framework that links immigrants with terrorists and security threats and that underwrites the state's enforcement apparatus. Through their activism, undocumented youth are also showing that the unauthorized are not only subject to enforcement regimes, but they have power in challenging these regimes.

Tactical innovations are embedded in a broader tactical interaction with the state. Organizers escalate their tactics and claims by building upon and leveraging the incomplete gains they make through their prior activism. In these campaigns undocumented youth were not seeking to reinscribe their exceptionality as deserving, rather they were using this exceptionality to challenge the state and to situate themselves among the criminalized, destabilizing the state's power to police and its constructions of deservingness. Counterintuitively, by embodying neoliberal constructions of citizenship that valorize and protect a select segment of the undocumented

population, undocumented youth challenged legal status as a metric for the right to enter and stay in the nation for *all* of the undocumented. In doing so, they were attempting to untether the link between undocumented status and subjection to state control practices. Rather than conform to their exceptional position narrowly, then, youth used it to expose the state, secure their safety, and challenge enforcement practices and these same constructions of deservingness.

Assessing these challenges is especially timely in the contemporary moment given that political movements are expanding their tactics to fight back against the enforcement measures that states are implementing to control “illegal” and “expelled” populations. NIYA organizers form part of this global movement to disrupt and dismantle escalating and punitive immigration control technologies. What the Shadows and BTH campaigns demonstrate is that it is never a simple matter as to whether activists simply challenge or reify state categories and mechanisms of control. Instead, activists can challenge the state through the very same means that the state uses to solidify the status quo and to subvert the movement.

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