



MOVING BEYOND EXTERNALIZATION IN THE U.S.-MEXICO RELATIONSHIP

February 2026



TABLE OF CONTENTS

ACKNOWLEDGMENTS 3

INTRODUCTION 4

THE CURRENT MOMENT 4

EXTERNALIZATION IN THE U.S.-MEXICO RELATIONSHIP 6

THE COSTS OF EXTERNALIZATION 7

MOVING BEYOND EXTERNALIZATION 9

CONCLUSION 12

NOTES 13

ACKNOWLEDGMENTS

THIS POLICY PAPER draws on ideas that emerged at a binational convening hosted in August 2024 by the Seminar Migration, Inequality, and Public Policies (MIGDEP) of El Colegio de México (COLMEX) and the Center for Immigration Law and Policy (CILP) at the UCLA School of Law in Mexico City. The goal of the convening was to stimulate discussion on migration law and policy unconstrained by some of the traditional silos in which these conversations often occur. These silos can reflect boundaries of profession (academic vs. practitioner), discipline (law vs. social sciences), and geography (United States vs. Mexico). This paper is the first in a series that aims to build on the ideas from these discussions and propose ways to reimagine the U.S.-Mexico relationship with respect to migration.

This paper was authored by Sofia López Franco, a staff attorney with the Center for Immigration Law and Policy (CILP) at the UCLA School of Law, with input from Convening organizers and participants.

CONVENING ORGANIZERS INCLUDED:

Claudia Masferrer, Associate Professor, Centre for Demographic, Urban, and Environmental Studies (CEDUA) and Coordinator of the Seminar Migration, Inequality and Public Policies (MIGDEP), El Colegio de México (COLMEX)

Hiroshi Motomura, Susan Westerberg Prager Distinguished Professor of Law and Faculty Co-Director, Center for Immigration Law and Policy (CILP), UCLA School of Law

Talia Inlender, Deputy Director, Center for Immigration Law and Policy (CILP), UCLA School of Law

Luicy Pedroza, Assistant Professor, Centro de Estudios Internacionales, El Colegio de México (COLMEX)

CONVENING PARTICIPANTS INCLUDED:

Raquel Aldana, Martin Luther King, Jr. Professor of Law, University of California, Davis, King School of Law

Ahilan Arulanantham, Professor from Practice and Faculty Co-Director, Center for Immigration Law and Policy (CILP), UCLA School of Law

David Baluarte, Senior Associate Dean for Academic Affairs and Professor of Law, City University of New York (CUNY) School of Law; Visiting Professor, fall 2023, Alaíde Foppa Refugee Legal Clinic, Universidad Iberoamericana (UIA), Mexico City

Elba Coria, Advocacy Director, Kids in Need of Defense (KIND), Mexico Program

Alexandra Délano, Professor of Global Studies and Eugene M. Lang Professor for Excellence in Teaching and Mentoring, The New School

David FitzGerald, Theodore E. Gildred Chair in U.S.-Mexican Relations, Professor of Sociology, and Sergio Vieira de Mello Chair in refugee studies at the University of California, San Diego

Maryellen Fullerton, Suzanne J. and Norman Miles Professor of Law, Brooklyn Law School

Susan Gzesh, Instructional Professor in the College, University of Chicago

Nancy Landa: Independent Researcher, MSc in International Migration, University College London

Monika Langarica, Senior Staff Attorney, Center for Immigration Law and Policy (CILP), UCLA School of Law

Daniel Kanstroom, Professor of Law, Boston College School of Law, and Co-Director, Boston College Center for Human Rights and International Justice

Gretchen Kuhner, Director for the Institute for Women in Migration (IMUMI), Mexico City

María Dolores París Pombo, Professor, El Colegio de la Frontera Norte (COLEF), Tijuana

Mauro Pérez Bravo, Coordinator, Dimensión Episcopal de la Pastoral de Movilidad Humana en México, México City

INTRODUCTION

Migration policy has not always played a central role in the relationship between the United States and Mexico.¹ But over the past few decades, migration has been an increasingly important feature of the binational dynamic between the two countries—one that appears likely to remain central moving forward. To the extent there has been cooperation on migration, externalization policies have been front and center. In the migration context, externalization refers to measures undertaken by destination countries to shift migration management processes from a country's interior or physical border to instead take place partly or entirely outside of a country's territorial boundaries.² Externalization policies are sometimes set out in bilateral or multilateral agreements with countries of transit or origin.³ But externalization policies also take shape in ad hoc or informal arrangements between or among countries. The results both limit physical access to the border of the destination country and punish those who make the journey in spite of those restrictions.

This paper outlines the origins and harms of externalization policies and proposes alternative approaches to bilateral engagement for the United States and Mexico. The paper's ultimate aim is to open lines of discussion among academia, civil society groups, and eventually, government actors on both sides of the U.S.-Mexico border to reimagine bilateral engagement on migration.

The paper proceeds first by situating its discussion in the current political moment, assessing both its challenges and promise for shifting the U.S.-Mexico dynamic on migration. Second, the paper discusses the historical relationship between Mexico and the United States, with a particular emphasis on policies that have resulted in externalization of migration control. Third, the paper outlines the tangible and intangible costs of externalization policies in the U.S.-Mexico context. Finally, the paper outlines recommendations for bilateral engagement on migration policy that moves beyond externalization.

THE CURRENT MOMENT

The current moment presents both immense challenges and promising opportunities to shift the historic relationship between the United States and Mexico on migration issues generally, and on externalization in particular.

Specifically, both countries have new leadership that reflects a changing political environment. Beginning in around 2018, Mexico began a political project referred to as the "Fourth Transformation" with the presidency of Andrés Manuel López Obrador ("AMLO"), and continuing with his successor Claudia Sheinbaum's administration.⁴ The project's proponents cite as their goals the restructuring of social and political systems aimed largely at the empowerment of marginalized communities in Mexico. The project's critics point to a massive expansion in presidential power and of the military into formerly civil industries, and weakening democratic institutions, including an unprecedented reform of the judicial power, the fracturing of the relationship with civil society, and reduced transparency on issues of migration.⁵

The United States has also experienced a shift in political leadership. After four years of the Democrat-led Biden administration, in November 2024 the United States elected Republican Donald J. Trump to a second term, marking a departure not only from his predecessor, but even from his own first term. The second Trump administration has already taken steps to dramatically restructure the executive branch in line with “Project 2025,” a conservative blueprint for the administration.⁶ These changes have included aggressive expansions of immigration enforcement both inside the United States and at its borders, and severely limiting or altogether eliminating access to humanitarian protections.

Since January 2025, the Trump administration has taken a series of aggressive steps that both directly and indirectly impact the United States’ relationship with Mexico with regard to migration and more generally. These steps include funding cuts to humanitarian aid,⁷ tariffs (both real and threatened),⁸ aggressive deportation efforts,⁹ unprecedented agreements with third countries,¹⁰ and attempts to eliminate access to humanitarian protections.¹¹ Mexico’s response has been mixed—agreeing or acquiescing at times, and pushing back at other times, though always focused publicly on conveying a core message of Mexican sovereignty.¹²

Though these changes have put tremendous strain on the U.S.-Mexico relationship, times of seismic shift also present unique opportunities for reimagination. As historical patterns are called into question, new dynamics may take root. This occurred during the first Trump administration, which saw a robust response by civil society.¹³ This civil society response included the development of welcoming infrastructure on both sides of the U.S.-Mexico border and increased binational cooperation and information sharing among advocates. When it was less promising to push federal government actors in the United States towards solutions, civil society groups on both sides of the border worked with international agencies, the private sector, and, where possible, state and local government actors to develop their own cross-border networks to work together on shared issues at a binational level.¹⁴

Still, the current moment puts even greater strain on the traditional U.S.-Mexico relationship in many ways. During the first Trump administration, Mexico could presume that migrants who reached the United States would have some opportunity to seek humanitarian relief, but such presumptions no longer hold.¹⁵ On both sides of the border, many civil society actors that were active during the first Trump administration now face unprecedented organizational strains, including funding cuts, attacks on their tax-exempt status, as well as doxxing and threats of criminal prosecution directed against staff.¹⁶ This combination of harsh enforcement coupled with attacks on civil society has led to a drastic decrease in numbers of migrants arriving at the U.S.-Mexico border, the closure of migrant-serving shelters in border areas, and the fraying of information gathering mechanisms that have in the past played a crucial role in advocacy to protect migrants’ rights.¹⁷

And yet, working together across borders is more necessary than ever in the face of rising authoritarianism and anti-immigrant sentiment in the United States and Mexico. Nongovernmental actors, including academia and civil society, are uniquely positioned to come together to reimagine the U.S.-Mexico relationship, work to solve shared challenges, and push government actors toward solutions that protect the

safety and dignity of migrants. It is in this context that we hope to situate this paper and its proposed solutions.

EXTERNALIZATION IN THE U.S.-MEXICO RELATIONSHIP

Externalization has been a central feature of migration agreements and broader collaboration between the U.S. and Mexico for over a decade.¹⁸ But the focus on externalization is not unique to this bilateral relationship. Many destination countries have sought to address migration by entering into agreements with transit countries to prevent migrants from reaching the destination country's borders.¹⁹ As a recent example, the European Union agreed in 2024 to pay over one billion Euros to Lebanon to keep migrants from getting on boats bound for the EU-member state of Cyprus.²⁰

The United States has long engaged in externalization efforts.²¹ With Mexico as its immediate southern neighbor, the United States has come to rely on externalization to make many forms of U.S. border control possible.²² In recent years, these efforts to extend the U.S.'s functional border into Mexico have become more aggressive and their results more punitive. This externalization has taken numerous forms, across both Democratic and Republican administrations. For example, in 2014, Mexico began its "Programa Frontera Sur" (Southern Border Program), which aimed to increase border control and migration management at Mexico's southern border in response to an increase in unaccompanied Central American children arriving at the U.S. southern border.²³ More recent examples include metering at ports of entry, the so-called Migrant Protection Protocols ("MPP" or "Remain in Mexico" program), and the requirement that individuals use CBP One—an app-based appointment system—as the exclusive way to seek asylum at ports of entry.²⁴ Under each of these policies, the U.S. government blocked access to the U.S.-Mexico border and punished those who circumvented the restrictions by limiting or altogether eliminating their ability to seek humanitarian protections in the United States.

Additionally, the United States has tried to enter into a so-called "safe third country" agreement with Mexico, including most publicly in 2018.²⁵ Mexico has formally rejected such an agreement.²⁶ However, many scholars argue that Mexico's collaboration with the United States on migration since 2018 has had the effect of Mexico operating as a *de facto* "safe third country," without having to publicly admit to such an agreement.²⁷ This collaboration has included, most prominently, Mexico's role in MPP—wherein asylum seekers were processed at the U.S. border and then sent back to Mexico while they awaited U.S. immigration court proceedings for months and sometimes years—as well as Mexico accepting the return or removal of certain non-Mexicans from the United States.²⁸ Some scholars argue that this has allowed the United States to restrict access to humanitarian protections for migrants in a similar manner as a "safe third country" agreement with Mexico would have, without the public accountability and clarity of a formal agreement.

As noted, externalization in the U.S.-Mexico context has increasingly included agreements for Mexico to accept the deportations from the United States of non-Mexican nationals. This allows the United States to forgo negotiating the return

of non-Mexican migrants to their countries of origin, instead placing the onus on Mexico to do so or to absorb them into Mexico. Recent data shows Mexico accepted over 70,000 non-Mexican deportees just between January 1, 2023, and June 2, 2024.²⁹ Externalization has also included agreements for Mexico to keep migrants in southern Mexico and thus away from the U.S.-Mexico border. Though the full scope of these agreements has not been made public, the Mexican government has acknowledged them in various contexts, as concessions to avoid U.S. tariffs or respond to other threats from the U.S. government.³⁰ In response to this pressure, Mexico has also adopted more aggressive measures to keep migrants away from the U.S.-Mexico border, continuing efforts that began with Programa Frontera Sur. These include mobility restrictions, busing migrants to the south of Mexico, and receiving deportation flights in the interior of the country, including directly to Southern Mexico.³¹

Despite what is known about some externalization policies, there is much more that remains unknown.³² Though some contours of these agreements have been made public, the details of what Mexico gets in exchange for its collaboration are unclear. It is an open question whether Mexico gets anything affirmative in exchange for entering into these agreements, or if it does so to avoid tariffs or other coercive policies. This lack of transparency has blocked public accountability for externalization policies on both sides of the border. It has also left civil society largely out of the discussions or ignored entirely.³³

THE COSTS OF EXTERNALIZATION

Externalization in the U.S.-Mexico relationship on migration has substantial costs. First, externalization has direct costs to international norms of *nonrefoulement* and humanitarian protection. These are norms that both the United States and Mexico have embraced in principle if not always in practice.³⁴ Yet many externalization policies operate by making it a practical, if not legal, impossibility to seek asylum, and the international principles and rules governing humanitarian protections are ambiguous or do not apply at all.³⁵

This problem arises because a country does not have an internationally recognized obligation to protect migrants who do not reach its borders. This means that countries can try to shirk their responsibilities under international laws and treaties by keeping migrants away from their territory.³⁶ Similarly, countries can attempt to avoid their obligations under domestic law, including ratified treaties like the Convention Against Torture, by keeping people from entering and asserting claims.³⁷ These spaces where humanitarian protection is de facto unavailable also raise the practical challenge of finding an effective enforcement mechanism to counter this erosion of humanitarian protections.

Domestic jurisdictional limits often operate to keep courts from hearing claims for protection when an individual is outside the country's physical borders.³⁸ This also incentivizes countries to engage in externalization practices that keep migrants from reaching their shores. This allows governments to effectively opt out of their international and domestic legal obligations of *nonrefoulement*, thus diluting the global commitment to humanitarian protection.

Second, externalization comes with substantial structural costs, both to civil society and to the governments themselves. Though government, civil society, and international organizations have at times been successful in creating a welcoming infrastructure at the U.S.-Mexico border, this infrastructure has proven vulnerable to erratic and unpredictable externalization policies, which impair the ability of advocates and civil society to respond to the needs of migrants in the region.³⁹ Though too much pressure from increased migration on the border can present its own structural challenges, rapid changes that move processing south of the border can cause a developed welcoming infrastructure at the border to fray. The result has been to limit the infrastructure's responsiveness by rendering migrants' needs less visible.

Just as civil society incurs structural costs from externalization policies, so do governments. Because the number of people both transiting through and seeking protection in Mexico can vary widely in response to U.S. border policies, it can be challenging for Mexico to prepare for and adequately address its shifting needs and the needs it aims to meet. Thus, Mexico bears significant costs as a direct result of its participation in U.S. externalization policies. Mexico's agreement to increase its efforts to limit the mobility of migrants transiting through Mexico, combined with U.S. policies aimed at limiting access to humanitarian protection at the border, have placed a great strain on the Mexican humanitarian protection system, forcing it to rapidly adapt to unpredictable and growing demand.⁴⁰

Demand for humanitarian protection in Mexico began rising in 2016, with the number of applications starting to double annually in 2017, until a temporary drop during the COVID-19 pandemic in 2020.⁴¹ These demands put stress on the humanitarian protection system and result in violations of domestic law, which require timely processing of asylum applications and the processing of migration documents for asylum seekers—neither of which the Mexican government is currently doing.⁴² This increased stress also frays the welcoming infrastructure within Mexico, including migrant shelters and NGO capacity across different geographies.

Finally, externalization policies carry real human costs. The erratic nature of these policies leads to increased precarity for those seeking humanitarian protection. This can include having to navigate rapidly changing rules that govern when and how one may seek protection at the border.⁴³ It also includes surviving long waiting times in dangerous conditions to cross the border.⁴⁴ The inability to leave or wait elsewhere without forfeiting claims makes migrants vulnerable to organized crime groups or others willing to prey on them including, at times, Mexican government officials.⁴⁵ For example, during the period that the MPP program was in effect, human rights groups documented kidnappings and extortion of migrants awaiting U.S. immigration court hearings in Mexico.⁴⁶

Other human costs arise when migrants seeking protection are left without recourse from being sent back to their country of origin or sent to other places where their lives may be in danger.⁴⁷ In Mexico, migrants in transit face an additional dilemma. On the one hand, Mexico has adopted the Cartagena Declaration, which provides broader eligibility for humanitarian protection than what is available in the United States.⁴⁸ On the other hand, procedural limitations force asylum seekers who wish to seek protection in Mexico to apply within 30 days of arrival and remain in the state

where they file while that application is adjudicated.⁴⁹ This forces migrants to choose between seeking protection far from the U.S.-Mexico border where their lives may be in danger, or abandoning one's application to make the journey north and risking that their access to the U.S. asylum system will be limited or blocked entirely.⁵⁰

In short, externalization leaves people in de facto asylum-free zones where there is no fair process—and in some cases, no process at all—for deciding claims to humanitarian protection that are otherwise grounded in international and domestic law. This inevitably results in people with valid claims for humanitarian protection returning to or remaining in places where they are in danger.⁵¹ Limitations on other pathways to permanent status further exacerbate this problem, pushing people towards asylum as one of the sole remaining pathways, even as asylum becomes increasingly inaccessible, both practically and legally.⁵² The consequence is putting people's safety and often their lives in jeopardy.

MOVING BEYOND EXTERNALIZATION

Given these serious costs, the U.S. and Mexico should pursue cooperation on migration policies that effectively resolves shared challenges and moves each country closer to its respective goals. To that end, this section offers recommendations for rethinking U.S.-Mexico cooperation on migration.

First, if Mexico aims to improve its negotiating position vis-à-vis the United States on migration issues, then its government should move towards more transparent and inclusive negotiations on its migration agreements. A plural and transparent institutional landscape for migration policymaking—including registered civil society organizations which are entitled by law to have a say—can promote legitimacy and place Mexico in a strengthened position on migration vis-à-vis the United States.⁵³ A regular exchange of information with civil society actors—who collect up-to-date information on the field and migrants' needs—would better position Mexico to effectively manage migration challenges resulting from externalization and provide more effective governance to the country's many diverse communities.⁵⁴ If the Mexican government were to become politically and electorally accountable on issues of migration as a result of increased transparency into its dealings, the United States may presume Mexico will require more in exchange for agreements considered unpopular or risky domestically. Mexico therefore has an incentive to take steps towards transparency even absent U.S. participation.

Transparency on Mexico's part may prove especially crucial when, as now, the U.S. government is providing little to no information on its migration agreements with other governments. As one example, the U.S. government is increasingly relying on undisclosed agreements allowing deportations to third countries, and the U.S. Supreme Court recently issued a ruling allowing those deportations to proceed with little to no notice.⁵⁵ In light of these developments, any transparency that Mexico can provide as to whether it has agreed to accept non-Mexican deportees, and if so, under what conditions, could help provide clarity for migrants and increase public accountability around third-country agreements more generally. For Mexico, this transparency can

also help build pressure against unilateral moves from the United States and put Mexico in a stronger position to negotiate.

Second, if both countries take seriously their commitments to protect vulnerable groups, the United States and Mexico should reorient cooperation around protection of migrants instead of punitive measures.⁵⁶ To be sure, the United States is currently taking major steps away from respecting its commitment to humanitarian principles, including the principle of *nonrefoulement*. Indeed, the harsh immigration policies of the second Trump administration appear to be moving the United States away from its historic role as a country of destination and refuge, and positioning Mexico to take on that role in the region.⁵⁷ Whether this shift will be a lasting one remains to be seen, given that the United States' historic role as a destination country has fueled the country's tremendous economic strength and its political influence—including on humanitarian issues—on the global stage. If (and we hope when) the United States wishes to take steps to rebuild its humanitarian infrastructure and recommit to globally accepted principles in the future, then agreements on the protection of vulnerable migrants would be an obvious place to start. For example, the two countries could enter into agreements to protect particularly vulnerable migrants, such as children, from other countries, as well as U.S. citizens who are *de facto* deported to Mexico, and Mexican children arriving at the U.S. border.⁵⁸ Such agreements should reflect shared understandings of what process is required before deporting or expelling vulnerable migrants, as well as shared expertise from both sides of the border on adequate protection for vulnerable groups.

Third, if a key goal of binational cooperation is to relieve pressure from the physical border, the United States and Mexico should collaborate on establishing new, viable migration pathways. These types of pathways can help reduce capacity limitations without incurring many of the costs of traditional externalization policies, like leaving asylum seekers without a viable path to seek safety. Examples of such programs include humanitarian parole pathways like those in the Biden administration program for individuals from Cuba, Haiti, Nicaragua, and Venezuela (CHNV). The program offered a two-year temporary stay with work authorization for qualifying individuals from these four countries. It required, among other things, a sponsor in the United States who agreed to support the individual during their parole period. People were able to apply and be vetted from outside of the United States, and up to 30,000 people total from all four countries could be paroled each month after getting approved and traveling directly into the interior of the United States.⁵⁹ In exchange, Mexico agreed to accept removals of up to 30,000 individuals from these countries who did not enter through the program. In total, the U.S. government granted parole to at least 531,000 people through the program.⁶⁰ The Biden administration also established similar parole programs for individuals from Ukraine and Afghanistan that aimed to address increased demand for humanitarian protection from those countries, though the details and effectiveness of each program varied.⁶¹ Other models like Safe Mobility Offices (SMOs) similarly aimed to expand access to lawful pathways to the United States for individuals seeking protection from abroad by processing individuals for resettlement, refugee status, or other lawful avenues outside of the United States.⁶²

While imperfect, these processes hold promise as externalization models that, with the necessary investment in infrastructure, could lessen strain on the border while providing a viable avenue for individuals to seek humanitarian protection. Indeed, following the adoption of the CHNV program, unlawful border crossings by individuals from the four countries plummeted.⁶³ While the current U.S. administration has reduced numbers of unauthorized border crossings through aggressive and punitive enforcement, CHNV and similar models demonstrate ways the United States could take steps to lessen pressure at the border while complying with its international legal protections.⁶⁴

The CHNV program's sponsorship model highlights another way that an orientation toward protection—rather than enforcement—might be realized: by promoting policies that increase capacity to receive migrants.⁶⁵ CHNV's private sponsorship model allowed for the participation of private citizens and civic institutions in protective migration policies. Within five months of the start of the program, 1.5 million U.S.-based individuals had applied to sponsor CHNV parolees, and that number continued to grow.⁶⁶ There can also be a role for community-based responses beyond private sponsorship to influence externalization policies. This type of civil society participation played an important role in the European Union's reception of displaced Ukrainians after the Russian invasion, ultimately expanding practical capacity for reception. Eight weeks into the war, more than five million displaced Ukrainians found shelter in the European Union. In some places, like Italy and Belgium, 85 to 90 percent of displaced Ukrainians resided in private homes.⁶⁷ This type of interpersonal engagement can help fill gaps in available reception services, but it can also signal to the government that their citizens value and support newcomers, which can help pressure the government to move away from harmful externalization policies. Governments can also invest in these efforts, just as some in the European Union did, providing stipends to families that housed newcomers from Ukraine.⁶⁸

Finally, even outside of government-led or funded initiatives, there is a role for individuals, academia, and civil society groups to lead efforts that move beyond externalization. Individuals (including elected officials) can engage in protest, court watch, or other means of civic participation that bring visibility to harmful policies, including externalization. These acts may carry some individual risk of arrest or other negative responses from government actors, particularly in this time. However, even where those risks materialize, civil disobedience can play an important role in shedding light on the underlying policy harms.⁶⁹

Beyond the individual level, civil society and academic organizations on both sides of the border can help develop structures to receive migrants, particularly where the government is not filling that role. This type of response occurred in the rapid growth of a welcoming infrastructure, including shelters and an increased presence of legal service providers, at the U.S.-Mexico border during the first Trump administration. As externalization policies keep people away from the physical border, there is an important role for border communities to share expertise with other communities in the interior on developing a welcoming reception for migrants.⁷⁰ As funding cuts impact the ability of organizations to respond in this moment, private philanthropy may also play a crucial role in providing financial support for these types of civil society responses.⁷¹

Civil society and academic partnerships can also help fill legal gaps that result from harmful or erratic policies, including those furthering externalization. For example, partnerships between law clinics in the United States and Mexico can allow for expanded representation capacity for migrants.⁷² Regional civil society networks can also help increase responsiveness to volatile conditions on the ground and can fill gaps in aid or other resources for vulnerable groups left by governments.⁷³ Such partnerships may also facilitate accurate and streamlined information-sharing on rapidly changing (and sometimes unannounced) migration policies. Academia can also help serve as a bridge between civil society and government actors, helping convey ideas developed by individuals and organization working on the ground. Civil society and academia therefore have an important role to play in fostering binational cooperation at the non-governmental level, helping to generate ideas and create the conditions for bilateral policymaking moving forward.

CONCLUSION

The U.S.-Mexico relationship, to the extent it has dealt with migration, has historically centered on U.S. externalization policies and Mexico's acquiescence in those efforts. This remains true today. But this moment also presents unique opportunities to rethink this dynamic and start working towards policies that better meet the needs of both countries as well as migrants themselves. The priorities moving forward should include increased transparency into bilateral agreements, prioritizing protection rather than enforcement in policymaking, and a deep investment in and by civil society partners and academia. These recommendations could help both countries address shared challenges without causing significant harm to international legal norms, existing infrastructure, or, most importantly, people.

NOTES

- 1 See Gustavo Mohar & Maria Elena Alcaraz, *U.S. Border Controls: A Mexican Perspective*, in *The Wall Around the West: State Borders and Immigration Controls in North America and Europe* (2000); Ana Covarrubias, *La política exterior migratoria*, in *La intersección de la política exterior y la política migratoria en el México de hoy 84-90* (Claudia Masferrer & Luicy Pedroza, eds. 2021)
- 2 See, e.g., Ayelet Shachar, *The Shifting Border: Legal Cartographies of Migration and Mobility* (2020); Aristide R. Zolberg, *A Nation by Design: Immigration Policy in the Fashioning of America* (2008).
- 3 For more on the classifications of destination, transit, and origin countries, see, e.g., Angeliki Dimitriadi, *Transit Migration: A Contested Concept*, in *Routledge Handbook of Immigration and Refugee Studies* (2015); Matlotleng P. Matlou & Shingirirai S. Mutanga, *The Impact of Migration Flows: Origin, Transit and Receiving States*, 40 *Af. Insight* 128 (2010).
- 4 Vanda Felbab-Brown & Diana Paz García, *Mexico, López Obrador, and Sheinbaum's presidential victory*, *Brookings* (Jun. 10, 2024), <https://www.brookings.edu/articles/mexico-lopez-obrador-and-sheinbaums-presidential-victory/>.
- 5 *Id.*
- 6 See Project 2025 Tracker (last visited Sept. 30, 2025), <https://www.project2025.observer/en>
- 7 See Samy Magdy & Farnoush Amiri, *As U.S. foreign aid drops, United Nations agencies that provide aid worldwide slash jobs or cut costs*, *PBS* (Apr. 29, 2025), <https://www.pbs.org/newshour/world/as-u-s-foreign-aid-drops-united-nations-agencies-that-provide-aid-worldwide-slash-jobs-or-cut-costs#:~:text=La%20organizaci%C3%B3n%20Internacional%20para%20las%20Migraciones,personal%20de%20la%20sede%20central%20en%20un%2020%25>
- 8 See Wyatt Grantham-Philips, *Trump's tariffs have launched global trade wars. Here's a timeline of how we got here*, *AP* (May 26, 2025), <https://apnews.com/article/consumer-prices-inflation-trump-trade-6ea513a44876c2f4dc948a25c15b0eb0>.
- 9 See e.g., Hannah Fry, Grace Toohey & Richard Winton, *Trump's unprecedented show of force in L.A., Washington is pushing norms, sparking fears*, *L.A. Times* (Aug. 16, 2025), <https://www.latimes.com/california/story/2025-08-16/trumps-show-of-force-blue-cities>; Margy O'Herron, *Big Budget Act Creates a "Deportation-Industrial Complex,"* *Brennan Center for Justice* (Aug. 13, 2025), <https://www.brennancenter.org/our-work/analysis-opinion/big-budget-act-creates-deportation-industrial-complex>; Rebecca Santana, *Trump administration uses multiple techniques to encourage and force deportation*, *AP* (May 21, 2025), <https://apnews.com/article/deportation-immigration-south-sudan-homeland-security-border-b5a4d17d31da3ca81e5e3bc6aadecaf8>.
- 10 Camilo Montoya-Galvez, *U.S. seeking deportation deals with far-flung countries like Angola and Equatorial Guinea*, *CBS News* (May 5, 2025), <https://www.cbsnews.com/news/u-s-deportation-deals-with-angola-equatorial-guinea/>.
- 11 See, e.g., *Protecting the American People Against Invasion*, Exec. Order 14159, 90 Fed. Reg. 8443 (Jan. 20, 2025); *Realigning the United States Refugee Admissions Program*, Exec. Order 14163, 90 Fed. Reg. 8459 (Jan. 20, 2025).
- 12 See Stephania Taladrir, *The Mexican President Who's Facing Off With Trump*, *The New Yorker* (Apr. 21, 2025), <https://www.newyorker.com/magazine/2025/04/28/claudia-sheinbaum->

- profile.
- 13 We use this term to refer not only to non-government organizations (NGOs) but also to encompass other public sphere participants—whether they be individuals, coalitions, or other social movement networks—who are acting outside of state institutions. For more on the definition of “civil society” see Paul Gready & Simon Robins, *Rethinking Civil Society and Transnational Justice: Lessons from Social Movements and the ‘New’ Civil Society*, 21 *Int. J. of Hum. Rights* 956, 958 (2017).
 - 14 See Monika Y. Langarica, *Looking Past Manufactured Crisis Narratives: Grounded Solutions for the Border and Beyond*, 61 *San Diego L. Rev.* 795 (2024); Emilio Alberto López Reyes & M. Dolores Paris-Pombo, *Humanitarian infrastructures in the border cities of Ciudad Juarez and Tijuana*, 24 *Estud. Front.* (2023).
 - 15 See, e.g., Amy Taxin, *Trump administration revokes parole of Mexican girl receiving lifesaving care in US, lawyer says*, AP News (May 28, 2025), <https://apnews.com/article/mexican-girl-medical-care-humanitarian-parole-f35b6ae96405f3f630bf2cbf0d6c9783>; Alan Feuer, Tyler Pager, Hamed Aleaziz & Mattathias Schwartz, *Judge Finds U.S. Violated Court Order With Sudden Deportation Flight to Africa*, N.Y. Times (May 21, 2025), <https://www.nytimes.com/2025/05/21/us/politics/south-sudan-deportation.html>; Mark Betancourt, *This Ethiopian Woman Was Tortured by Her Government. The US is Sending Her Home Anyway*, KQED (May 27, 2025), <https://www.kqed.org/news/12041326/this-ethiopian-woman-was-tortured-by-her-government-the-us-is-sending-her-home-anyway>.
 - 16 Lizbeth Diaz, *U.N. refugee agency to close four offices in Mexico amid funding crunch*, Reuters (Apr. 29., 2025), <https://www.reuters.com/world/americas/un-refugee-agency-close-four-offices-mexico-amid-funding-crunch-2025-04-29/>; Dani Miskell, *Jewish Family Service pauses migrant shelter services until further notice*, ABC10 (Feb. 19, 2025), <https://www.10news.com/news/local-news/jewish-family-services-pause-migrant-shelter-services-until-further-notice>; Lisa Mascaró, *Law firms, universities and now civil society groups are in Trump’s sights for punitive action*, AP News (Apr. 17, 2025), <https://apnews.com/article/trump-tax-exempt-crew-environmental-groups-harvard-5e1e0ffacfa040ccd eaf4e43fb72b5fe>; Miriam Jordan, *Faith-Based Groups That Assist Migrants Become Targets of Extremists*, N.Y. Times (Jun. 2, 2024), <https://www.nytimes.com/2024/06/02/us/migrants-charities-shelters-threats.html>.
 - 17 See Camilo Montoya-Galvez, *Illegal crossings along U.S.-Mexico border plummet to lowest annual level since 1970*, CBS News (Oct. 7, 2025), <https://www.cbsnews.com/news/illegal-crossings-immigration-us-mexico-southern-border-lowest-level-1970-trump-dhs/>; Miskell, *supra* n. 16.
 - 18 For more on other factors affecting U.S.-Mexico migration policy, including concerns over labor, tourism, and the economy, see, e.g., Hiroshi Motomura, *Immigration Outside the Law* 33-69 (2014); Hiroshi Motomura, *Borders and Belonging: Toward a Fair Immigration Policy* 85-100 (2025); Philip Martin, *Mexican-U.S. Migration: Policies and Economic Impacts*, 38 *Challenge* 56 (1995), <https://www.tandfonline.com/doi/pdf/10.1080/05775132.1995.11471818>; *Labor Market Issues Along the U.S.-Mexico Border* (Marie T. Mora & Alberto Dávila eds., 2009).
 - 19 See Abby Sewell, *EU announces 1 billion euros in aid for Lebanon amid a surge in irregular migration*, AP News (May 2, 2024), <https://apnews.com/article/lebanon-cyprus-eu-migration-europe-8639a76924445f2d2494684bc8e3b649>.

- 20 See Abby Sewell, *EU announces 1 billion euros in aid for Lebanon amid a surge in irregular migration*, AP News (May 2, 2024), <https://apnews.com/article/lebanon-cyprus-eu-migration-europe-8639a76924445f2d2494684bc8e3b649>.
- 21 Nation states also push migration controls beyond their physical borders through extra-territorialization and internalization. Extra-territorialization refers to when officials of a country themselves administer migration processes beyond the borders of the nation state, as with visa processing. See, e.g., Stephen Legomsky, *The USA and the Caribbean Interdiction Program*, 18 Intl. J. of Refugee L. 677 (2006). Internalization involves the process of insourcing the policing of migrants and enforcement controls far from the physical borders of a country, and scholars have pointed to the significant conceptual overlaps between this and externalization policies, which also serve to reconceptualize geographies of state power. See Cecilia Menjivar, *Immigration Law Beyond Borders: Externalizing and Internalizing Border Controls in an Era of Securitization*, 10 Ann. Rev. L. Soc. 353 (2014). Externalization and extraterritorialization are often used as synonymous, but while the latter highlights the exercise of state power beyond its territory, the former highlights that the diverse strategies to shift or delegate a wide range of migration policies to be overseen, implemented by third parties (usually other states, in their territories), handling them also the costs and responsibilities for that implementation.
- 22 See David Scott FitzGerald, *Buffering North America*, in *Refuge Beyond Reach: How Rich Democracies Repel Asylum Seekers* (2019).
- 23 Bill Frelick, Ian M. Kysel & Jennifer Podkul, *The Impact of Migration Controls on the Rights of Asylum Seekers and Other Migrants*, 4 J. on Migr. and Hum. Sec. 190 (2016).
- 24 See M. Dolores Paris-Pombo, *Externalization, Violence, and Migrants' Lengthy Wait at Mexico's Northern Border*, in *Forced Migration Across Mexico* (Ximena Alba Villaléver, et al., eds., 2024); Austin Kocher, *Migrant Protection Protocols and the Death of Asylum*, 20 J. of Lat. Am. Geo. 249 (2021); see also Shachar, *supra* note 2; Zolberg, *supra* note 2.
- 25 These agreements allow a state to deny protection to asylum seekers who traveled through and therefore, at least theoretically, could have sought protection in a designated "safe third country." For more on these agreements and their history, see Kiran Banerjee & Geoffrey Cameron, *Immigration Bureaucrats and the Development of the Canada-United States Safe Third Country Agreement*, Can. J. of Pol. Sci. 1 (2025).
- 26 Gobierno de México, Prensa de la Presidencia de la República, Conferencia de Prensa del Presidente Andrés Manuel López Obrador 24 de diciembre de 2018, at 24-12-2018 (Mex.), formato HTML, <https://www.gob.mx/amlo/prensa/conferencia-de-prensa-del-presidente-andres-manuel-lopez-obrador-24-de-diciembre-de-2018> (consultado el 22 de septiembre de 2025).
- 27 See Elisa Ortega Velazquez, *México como tercer país, ¿seguro? Instrumentalización del derecho de asilo*, 32 Frontera Norte (2020); Jorge Morales Cardiel & Chantal Lucero Vargas, *México ante el dilema del "Tercer país seguro" en el Contexto de los Protocolos de Protección a Migrantes (MPP)*, 5 Huellas de la Migración 37 (2020).
- 28 *Id.*; see also Terence M. Garrett & Arthur J. Sementelli, *COVID-19, Asylum Seekers, and Migrants on the Mexico-U.S. Border: Creating States of Exception*, 50 Politics & Policy 872 (2022).
- 29 Frontera Federation, *Mexico Has Accepted Thousands of Unlawful Deportations of Non-Mexicans* (Jul. 10, 2025), <https://www.fronterafederation.org/press-releases-1/mexico-has-accepted-thousands-of-unlawful-deportations-of-non-mexicans>.

- 30 Maureen Meyer & Gina Hinojosa, *Explainer: The Recent U.S.-Mexico Agreement to Address Regional Migration Flows*, WOLA (June 14, 2019), <https://www.wola.org/analysis/u-s-mexico-agreement-migration/>.
- 31 See Paris-Pombo, *supra* note 24; see also Adam Isacson, *Dispatch from Mexico: Difficulties Abound for Both Deported Individuals and Service Providers*, WOLA (Aug. 5, 2025), <https://www.wola.org/analysis/dispatch-from-mexico-difficulties-abound-for-both-deported-individuals-and-service-providers/>; Marinee Zavala, *Deportaciones ya no serán a Tijuana, sino a la CDMX*, Telemundo San Diego (May 14, 2025), https://www.telemundo20.com/noticias/local/deportaciones-no-seran-tijuana-cdmx-patrulla-fronteriza/2457593/?fbclid=IwY2xjawKa6r1leHRuA2FibQlxMQBicmlkETFINzRJVzBFYm1yTEZHbnVyAR7kRkLYNGo0ZDfAB6XtLWntC-fp7zBokfmU6X7FFSjohwNKf0hHa4Mkm3pRZQ_aem_NSgcdLOreez6uP1SsbZTgw.
- 32 See Noticias ONU, *Comité de la ONU advierte falta de claridad en los acuerdos migratorios entre México y Estados Unidos* (Apr. 24, 2025), <https://news.un.org/es/story/2025/04/1538266>; Jorge Santibáñez, *Opinion, Pompeo, Ebrard, las negociaciones vergonzosas y el desprecio por los migrantes*, L.A. Times (Feb. 1, 2023), <https://www.latimes.com/espanol/mexico/articulo/2023-02-01/opinion-pompeo-ebrard-las-negociaciones-vergonzosas-y-el-desprecio-por-los-migrantes>; El Colegio de México Seminar Migration, Inequality, and Public Policies, *The Intersection of Foreign Policy and Migration Policy in Mexico Today* (Claudia Masferrer & Luicy Pedroza, eds. 2022).
- 33 See, e.g., Center for Gender and Refugee Studies, *Mexico Should Refrain from Adopting Bilateral Agreements with the U.S. that Violate the Right to Seek Asylum* (Dec. 18, 2023), <https://cgrs.uclawsf.edu/our-work/publications/mexico-should-refrain-adopting-bilateral-agreements-us-violate-right-seek>; Michelle Quiñones Guzmán, *La agencia que prevalece ante la asimetría. Sobre los intereses del Sur Global en la aceptación de acuerdos bilaterales de externalización de políticas migratorias (enero de 2024)* (M.S. thesis, El Colegio de México) <https://repositorio.colmex.mx/concern/theses/k643b4036?locale=es>; see also Hiroshi Motomura, *Borders and Belonging: Toward a Fair Immigration Policy*, 133-146 (2025).
- 34 Both the United States and Mexico are parties to the Refugee Convention and the Convention Against Torture, both of which codify the commitment to the principle of *nonrefoulement*. See UNHCR, *States Parties to the 1951 Convention and Its 1967 Protocol* (updated Apr. 17, 2025), <https://www.unhcr.org/us/media/states-parties-1951-convention-and-its-1967-protocol>; United Nations Treaty Collection, *Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment* (last accessed May 16, 2025), https://treaties.un.org/pages/viewdetails.aspx?src=ind&mtdsg_no=iv-9&chapter=4&clang=_en.
- 35 See Kocher, *supra* note 24; Paris-Pombo, *supra* note 24.
- 36 See James C. Hathaway, *The Rights of Refugees under International Law* 173-219 (2021).
- 37 Hiroshi Motomura, *Borders and Belonging: Toward a Fair Immigration Policy* 23-40 (2025); see also e.g. Kate Morrissey, *CBP places officers at the border line as asylum seekers try to reach U.S. soil by driving across*, L.A. Times (Feb. 7, 2022), <https://www.latimes.com/california/story/2022-02-07/cbp-officers-border-asylum-seekers-drive-to-us>.
- 38 See, Marko Milanovic, *Extraterritorial Application of Human Rights Treaties: Law, Principles, and Policy* 17 (2015); for a U.S. example see *Sale v. Haitian Centers Council, Inc.*, 509 U.S. 155 (1993) (upholding an executive order directing the Coast Guard to intercept vessels with migrants and return them to Haiti without processing their claims for asylum).

- 39 See Langarica, *supra* note 14; López Reyes & París-Pombo, *supra* note 14. Cuts to UNHCR funding has similarly undermined the Mexican humanitarian protection system. See Diaz, *supra* note 16.
- 40 Israel Ibarra-González & María Dolores París Pombo, *La Política Migratoria Mexicana Frente al Muro de Trump*, 2 *Gaceta Migratoria* (2025); see also Migration Policy Institute, *One Year after the U.S.-Mexico Agreement: Reshaping Mexico's Migration Policies* (June 2020), <https://www.migrationpolicy.org/sites/default/files/publications/OneYearAfterUS-MexAgreement-EN-FINAL.pdf>.
- 41 See *id.*
- 42 See *id.*
- 43 For example, on inauguration day, President Trump ended CBP One, an app that the government under the Biden administration required migrants to use to seek "appointments" at the border. Those whose appointments were finally nearing faced abrupt cancellations without warning. For more on this, see Julie Watson & Megan Janetsky, *Migrants stranded when thousands of appointments to enter the US are cancelled as Trump takes Office*, AP News (Jan. 20, 2025), <https://apnews.com/article/trump-immigration-cbp-one-border-app-652854b5f2a4e6ccd6ee2ccc729cbb55>.
- 44 See Human Rights First, *Remain in Mexico: Unlawful, Ineffective, and Must Never Return* (Jan. 10, 2025), <https://humanrightsfirst.org/library/remain-in-mexico-unlawful-and-ineffective/> (detailing the dangers individuals enrolled in MPP faced while awaiting their hearings); Jonathan Blitzer, *How the U.S. Asylum System is Keeping Migrants at Risk in Mexico*, *The New Yorker* (Oct. 1, 2019), <https://www.newyorker.com/news/dispatch/how-the-us-asylum-system-is-keeping-migrants-at-risk-in-mexico>; París-Pombo, *supra* note 24.
- 45 Human Rights Watch, *Mexico: Abuses Against Asylum Seekers at US Border* (Mar. 5, 2021), https://www.hrw.org/news/2021/03/05/mexico-abuses-against-asylum-seekers-us-border?gad_source=1&gad_campaignid=16363698676&gclid=Cj0KCQjwxdBhDEARIsAAUKP6gOH3kxM0szjyHbzbwyqtm-6v0SB9E6yFM6vPFW4a0EfVRGnhSG02AaAj8mEALw_wcB.
- 46 *Id.*
- 47 See, e.g., Human Rights Watch, *Deported to Danger* (Feb. 5, 2020), <https://www.hrw.org/report/2020/02/05/deported-danger/united-states-deportation-policies-expose-salvadorans-death-and>.
- 48 See Migration Policy Institute, *supra* note 40.
- 49 *Id.*
- 50 Arturo Castellanos-Canales, *Mexico's Asylum System: Good in Theory, Insufficient in Practice*, *National Immigration Forum* (Mar. 15, 2023), <https://immigrationforum.org/article/mexicos-asylum-system-good-in-theory-insufficient-in-practice/>.
- 51 See Sarah Stillman, *When Deportation Is a Death Sentence*, *The New Yorker* (Jan. 8, 2018), <https://www.newyorker.com/magazine/2018/01/15/when-deportation-is-a-death-sentence>.
- 52 See Hiroshi Motomura, *The Future of Humanitarian Protection in the United States*, *The Carnegie Endowment* (Sept. 25, 2025), <https://carnegieendowment.org/posts/2025/09/humanitarian-protection-tps-asylum-us-future?lang=en>.
- 53 See Laura Valeria González-Murphy, *Protecting Immigrant Rights in Mexico: Understanding the State-Civil Society Nexus* (2013); Luicy Pedroza, *Desplazamiento Institucional en la gestión migratoria*, in *La intersección de la política exterior y la política migratoria en el México de hoy* 84-90 (Claudia Masferrer & Luicy Pedroza, eds. 2021).

- 54 See Masferrer & Pedroza, *supra* note 32 at 67-70.
- 55 Ximena Bustillo, *The White House is deporting people to countries they're not from. Why?*, NPR (June 1, 2025), <https://www.npr.org/2025/06/01/g-s1-69780/trump-deportations-south-sudan>.
- 56 See Hiroshi Motomura, *Borders and Belonging: Toward a Fair Immigration Policy*, 133-46 (2025).
- 57 See Montoya-Galvez, *supra* note 17 (noting the dramatic reduction in people seeking protection at the U.S. border). If Mexico is to take its emerging role as a destination country seriously, it will need to consider how to integrate migrant populations with divergent backgrounds, including those with class, ethnicity, language, and other differences. See Raúl Acosta-García, Esperanza Martínez-Ortiz, *Mexico through a superdiversity lens: already-existing diversity meets new immigration*, in *Comparing Super-Diversity* (2016).
- 58 See Women's Refugee Commission, *Torn Apart by Immigration Enforcement* (Dec. 2010), <https://imumi.org/attachments/2013/117845291-Parental-Rights-Report-final.pdf>; For more on the treatment of de facto deported U.S. citizen children in Mexico, see Claudia Masferrer, Erin R. Hamilton, & Nicole Denier, *The Returned: Former U.S. Migrants' Lives in Mexico City* (2024); Erin R. Hamilton, Claudia Masferrer, Paola Langer, *U.S. Citizen Children De Facto Deported to Mexico*, 49 Pop. and Dev. Rev. 175 (2023). For more on the treatment of unaccompanied Mexican migrant children in the U.S., see Kiera Coulter, et al., *A Study and Analysis of the Treatment of Mexican Unaccompanied Minors by Customs and Border Protection*, 8 J. on Migration and Hum. Sec. 96 (2020).
- 59 See American Immigration Council, *The Biden Administration's Humanitarian Parole Program for Cubans, Haitians, Nicaraguans, and Venezuelans: An Overview* (Oct. 31, 2023), <https://www.americanimmigrationcouncil.org/fact-sheet/biden-administrations-humanitarian-parole-program-cubans-haitians-nicaraguans-and/>.
- 60 See Fwd.US, *CHNV has been a huge economic success. The Trump administration should abandon its effort to fast track the revocation of humanitarian parole for more than 500,000 people* (May 16, 2025).
- 61 See American Immigration Council, *supra* note 59. For a discussion about the racial disparities underlying how these parole programs were set up and administered, see Ahilan T. Arulanantham, *Reversing Racist Precedent*, 112 Georgetown L.J. 439, 491-494 (2024).
- 62 Mixed Migration Center, *Safe Mobility Offices: Awareness, Migrants' Interest, and Potential Influence on Mixed Migration Dynamics in Latin America and the Caribbean* (Mar. 2024), https://mixedmigration.org/wp-content/uploads/2024/03/320_Safe-Mobility-Offices-Infographics_EN.pdf
- 63 Fwd.US, *Legal Pathways with Private Sponsorship Have Been Successful in Reducing Unauthorized Migration to the Border and Protecting Displaced People* (May 30, 2025), <https://www.fwd.us/news/legal-pathways-successful/>.
- 64 See Nikolas Feith Tan, *Transnational Asylum: Toward a Principled Framework* (2025).
- 65 See Motomura, *supra* note 52.
- 66 Camilo Montoya-Galvez, *1.5 million apply for U.S. migrant sponsorship program with 30,000 monthly cap*, CBS News (May 22, 2023), <https://www.cbsnews.com/news/us-migrant-sponsorship-program-cuba-haiti-nicaragua-venezuela-applications/>.

- 67 OECD, *Housing Support for Ukrainian Refugees in Receiving Countries* (July 27, 2022), https://www.oecd.org/content/dam/oecd/en/publications/reports/2022/07/housing-support-for-ukrainian-refugees-in-receiving-countries_ebec3000/9c2b4404-en.pdf.
- 68 See Kathy Burrell, *Domesticating Responsibility: Refugee Hosting and the Homes for Ukraine Scheme*, 56 *Antipode* 1191 (2024).
- 69 See, e.g., Cedar Attanasio, *NYC mayoral candidate Brad Lander arrested at immigration court*, AP (June 17, 2025), <https://apnews.com/article/brad-lander-nyc-immigration-court-arrest-6ed341297efab31a08a14421674d8ed8>; Jeanne Kuang and Nigel Duara, *'Outrageous': California Democrats react to FBI agents handcuffing Sen. Alex Padilla*, Cal Matters (June 12, 2025), <https://calmatters.org/politics/2025/06/alex-padilla-handcuffed/>.
- 70 See Langarica, *supra* note 14.
- 71 See Diaz, *supra* note 16; Miskell, *supra* note 16.
- 72 See, e.g., CUNY School of Law, *Academic Dean David C. Baluarte Expands Innovative Legal Education and Practice with U.S.-Mexico Clinical Collaboration* (Jan. 22, 2025), https://www.law.cuny.edu/newsroom_post/academic-dean-david-c-baluarte-expands-innovative-legal-education-and-practice-with-u-s-mexico-clinical-collaboration/; ImmigrationProf Blog, *First Binational Clinic in Mexico to Support LMU Loyola Law School's Immigrant Justice Clinic* (Oct. 3, 2024), <https://newsroom.lmu.edu/campusnews/transformational-gift-launches-first-binational-clinic-in-mexico-to-support-lmu-loyola-law-schools-immigrant-justice-clinic/>.
- 73 See, e.g., Asia Pacific Refugee Rights Network, *What We Do*, <https://aprrn.org/homepage/> (last visited Oct. 27, 2025).