

# **Memorandum of Law on Firm Resettlement: Focus on Haitians in Brazil**

April 3, 2017

## **I. INTRODUCTION AND BACKGROUND**

The 2010 earthquake in Haiti prompted many Haitians to emigrate, as environmental conditions exacerbated existing political and other human rights problems in Haiti.<sup>i</sup> As reported by Brazilian newspaper *O Globo*, “according to the Ministry of Labor, 65,000 Haitians have immigrated to Brazil since 2010 after the earthquake that killed 230,000 people and left 1.5 million homeless in their country.”<sup>ii</sup> The Brazilian government responded to this humanitarian crisis with various measures granting Haitians different forms of legal immigration status.<sup>iii</sup>

From 2010 to 2012, the majority of the Haitians that arrived in Brazil applied for refugee status at the Brazilian border. Under article 21 of the Brazilian Refugee Law, a migrant who applies for refugee status in Brazil will receive a “refugee protocol” (a provisional ID document), a temporary work permit, and a taxpayer ID number (Cadastro de Pessoas Físicas – CPF).<sup>iv</sup> The permission to work is valid until the government decides the case. Under the refugee law, public benefits are also available for Haitians, as are access to public school and to the public health system.<sup>v</sup>

Due to political reasons, the *Comitê Nacional para os Refugiados* – CONARE (National Committee for Refugees) decided internally that it would not grant refugee status to Haitians; the CONARE did not want to give the impression that Brazil would welcome all Haitians and was afraid that a decision to grant refugee status would encourage Haitians to come *en masse*, worsening the situation that was already critical.<sup>vi</sup>

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To address this issue, and to give Haitians a legal way to enter Brazil before they leave Haiti, the National Council of Immigration (Conselho Nacional de Imigração, CNIg) issued Normative Resolution No. 97<sup>vii</sup> on January 12, 2012. The resolution provides for the grant of a five-year “permanent” visa to nationals of Haiti for “humanitarian reasons,” according to the provisions of article 16 of Law No. 6,815, of August 19, 1980. Under Normative Resolution No. 97, the permanent visa is valid for 5 years. Before the expiration of the 5-year term, the Haitian must go to the Federal Police Department to request permanent residence. To be able to receive permanent status, the Haitian national must prove that: (1) he or she is working in Brazil; and (2) that he or she has a permanent residence (domicile) in Brazil. This is based on Article 18 of Law No. 6,815, which conditions the grant of a permanent visa on ability to prove current employment and a stable place to reside.

In November 2015, the Ministry of Labor and Social Security, along with the Ministry of Justice, signed a joint act authorizing 43,781 Haitians who were living in the country in an irregular situation to apply for permanent residence. This included those who had applied for refugee status prior to January 13, 2012 (the effective date of Normative Resolution No. 97). The government published a list of beneficiaries, who were given one year in which to apply.<sup>viii</sup> To apply for permanent residence through this process, Haitians must submit the following to the Brazilian authorities: a photo, a birth or marriage certificate translated by a sworn translator, or a consular certificate, a negative certificate of criminal record issued in Brazil, and a statement that they have not been prosecuted criminally in Haiti. Haitians interested in obtaining the permanent visa must also present proof of payment of the registration fee in the amount of R \$ 106.45 and the issuance of the Foreign Identity Card (CIE), in the amount of R \$ 204.77.<sup>ix</sup> As of January

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2017, “according to the Ministry of Labor, of this total, 31,223 Haitian citizens completed their permanent records in the country (71.17%). Just over 28% still need to finish their regularization processes.”<sup>x</sup> The deadline has been extended to May 2017.<sup>xi</sup>

## **II. ISSUES**

1. Whether Haitian citizens who had a humanitarian visa in Brazil have been “firmly resettled,” thus barring asylum.
2. Whether Haitian citizens who were covered under the November 2015 joint act authorizing a process for Haitians to apply for permanent residence in Brazil have been “firmly resettled,” thus barring asylum.
3. Whether Haitian citizens who obtained a refugee protocol document and temporary work permit under the Brazilian Refugee Law have been “firmly resettled,” thus barring asylum.

## **III. BRIEF ANSWERS**

1. No. The humanitarian visa is not an offer of firm resettlement because it is a temporary visa that does not entitle applicants to permanent residence without the ability to meet strict eligibility requirements. Even if it is an offer, Haitian citizens may not be “firmly resettled” because they may meet the “restrictive conditions” exception to the bar.
2. Possibly. While Haitian citizens who were covered under the November 2015 joint act authorizing permanent residence in Brazil may be found to have received an offer of firm resettlement, they may be able to meet an exception to the bar.

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3. Possibly. Haitian citizens who obtained a refugee protocol document and temporary work permit under the Brazilian Refugee Law may be found to have received an offer of firm resettlement through the 2015 act if their names were on the list. However, if their names were not on the list, it is possible that DHS cannot meet its burden. Further, they may be able to meet an exception to the bar.

#### IV. APPLICABLE LAW

Under current law, an applicant may not be granted asylum if he or she “was firmly resettled in another country prior to arriving in the United States.” See 8 U.S.C. § 1158(b)(2)(A)(vi); *see also She v. Holder*, 629 F.3d 958, 962 (9th Cir. 2010). The definition of firm resettlement is found at 8 C.F.R. § 1208.15: “Subject to two exceptions, [an applicant] has firmly resettled if, prior to arrival in the United States, he or she entered another country with, or while in that country received, an offer of permanent resident status, citizenship, or some other type of permanent resettlement.” *Camposeco-Montejo v. Ashcroft*, 384 F.3d 814, 819 (9th Cir. 2004). There “must be evidence of an offer of permanent, not temporary, residence in a third country where the applicant lived peacefully and without restriction.” *Maharaj v. Gonzales*, 450 F.3d 961, 969 (9th Cir. 2006) (en banc); *Camposeco-Montejo*, 384 F.3d at 819–20 (determining that an offer of temporary residence does not compel a finding of firm resettlement). *See also Masihi v. Holder*, 519 Fed. Appx. 963, 963 (9th Cir. 2013) (finding that applicant’s possession of renewable visa and work permit in third country is insufficient for firm resettlement).

The BIA has articulated a four-step framework for determining whether an asylum applicant has been firmly resettled. *See Matter of A-G-G-*, 25 I&N Dec. 486, 502 (BIA 2011). In

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step one, DHS bears the initial burden of establishing a *prima facie* case that an individual was firmly resettled in another country before arriving in the United States, through direct evidence of a government offer of “some type of official status permitting the [applicant] to reside in that country indefinitely.” *Maharaj*, 450 F.3d at 976 (emphasis added). Under step two, if the government has met its burden, the burden of proof then shifts to the applicant to show, by a preponderance of the evidence, that no offer was actually made or that the applicant is ineligible for the offer. *A-G-G-*, 25 I&N Dec. at 502. The immigration judge then decides in step three if the applicant rebutted the government’s showing of firm resettlement, and if not, step four requires the applicant to establish by a preponderance of the evidence that an exception to the firm resettlement bar applies. *Id.*

Whether relying on direct or circumstantial evidence, the focus of the firm resettlement inquiry remains on an offer of permanent resettlement. *Maharaj*, 450 at 972. The fact that a country offers a process for applying for some type of refugee or asylum status is not the same as offering the status itself. *Maharaj*, 450 F.3d at 977. However, an applicant may have an offer if he or she is entitled to permanent resettlement and all that remains in the process is for the applicant to complete some ministerial act. *Id.* Thus, the firm resettlement bar may apply if the applicant chooses to walk away instead of completing the process and accepting the third country’s offer of permanent resettlement. *Id.* The fact that an applicant no longer has travel authorization does not preclude a finding of permanent resettlement when the applicant has permitted his documentation to lapse. *Id.* at 969 (citing *Vang v. INS*, 146 F.3d 1114 (9th Cir. 1998) and *Yang v. INS*, 79 F.3d 932 (9th Cir. 1996)).

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Even if the DHS meets its burden of showing an offer of indefinite resettlement, an individual may establish that he or she was not firmly resettled in another country if he or she can show, by a preponderance of the evidence, that he meets one of the exceptions to the bar: (1) that his or her entry into that country was a necessary consequence of his or her flight from persecution, that he or she remained in that country only as long as was necessary to arrange onward travel, and that he or she did not establish significant ties to that country; or (2) that the conditions of his or her residence in that country were so substantially and consciously restricted by the authority of that country that he or she was not in fact resettled. 8 CFR 1208.15(a)-(b). In determining whether the conditions of an individual's residence in another country were substantially and consciously restricted, the Court should examine the conditions under which other residents of the country live, the type of housing available to the refugee, the type and extent of employment available, and the extent to which the individual received permission to hold property and enjoy other rights and privileges, such as travel documentation, education, public relief, or naturalization. 8 CFR 1208.15(b) (2006); *Matter of Soleimani*, 20 I & N Dec. 99 (BIA 1989).

## V. ANALYSIS

### A. Humanitarian Visa-Holders under Normative Resolution No. 97 Are Not "Firmly Resettled."

Haitian citizens who received a humanitarian visa under Normative Resolution No. 97 should not be considered "firmly resettled," as they did not receive an offer of permanent resettlement. Despite being called a "permanent visa," the humanitarian visa granted to Haitians provides only a temporary status, because it is given for a fixed term of five years, not

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indefinitely. The ability to apply for permanent residence before it expires is conditioned on having employment at the time of application for renewal, which is unlikely given the current economic crisis in Brazil. *See* Art. 18 of Law 6,815.

Brazil has been experiencing a serious economic and political crisis since 2014. In 2016, 1.9 million people lost their jobs in Brazil.<sup>xii</sup> The unemployment rate is 12.3%, reaching 12.6 million people.<sup>xiii</sup> A study by the Instituto de Desenvolvimento do Trabalho (Institute for Labor Development) has shown that in some regions of the country, a worker attempting to find a new job can wait up to one year to find a job.<sup>xiv</sup> This general economic crisis is affecting Haitians' employment prospects, even when they are highly-educated.<sup>xv</sup> According to data from the Catholic Church's *Pastoral Care for Migrants* program in São Paulo, there is a gap between the jobs available and the qualifications of those who are looking for work: Of 614 job openings offered by the market through the Pastoral services, only 84 were filled, most in the general services sector.<sup>xvi</sup> Given these economic conditions, many Haitians were not, or would not be, able to fulfill the employment requirement.

Since the path to permanent residence is blocked by these requirements, which demand more than simple "ministerial acts," this temporary status should not be considered firm resettlement. *Maharaj*, 450 F.3d at 977; *see also Singh v. Gonzales*, 220 Fed.Appx. 551, 553, 2007 WL 412032, at \*1 (9th Cir. 2007) (reversing BIA and finding there was no offer of entitlement to stay indefinitely where Singh's residency in the United Arab Emirates "depended upon continued employer sponsorship."). The fact that the Brazilian government requires that the applicant prove that they are currently working to be able to request permanent residence demonstrates that no applicant is "entitled" to permanent resettlement, and the grant of this status

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can be denied in the government's discretion if the applicant is not employed to the satisfaction of the Brazilian government. *Maharaj*, 450 F.3d at 977 (“...[A noncitizen] may have an “offer” if the [noncitizen] is entitled to permanent resettlement and all that remains in the process is for the [noncitizen] to complete some ministerial act.”) (emphasis in original).

Even if DHS can meet its burden of showing the grant of a humanitarian visa and process for a path to permanent residence was an offer of permanent resettlement, many Haitians would be able to meet their burden of rebutting by a preponderance of the evidence the presumption of firm resettlement given that they were ineligible for the offer. *A-G-G-*, 25 I&N Dec. at 502.

**B. Applicants Offered Permanent Residence under the Joint Act of November 2015 Have Received an “Offer of Firm Resettlement,” But May Not Be Firmly Resettled.**

Haitians who were living in Brazil and were either granted or simply offered the opportunity to apply for permanent resident status under the Joint Act of November 2015, may be found to have received an offer of permanent resettlement. This is because permanent residence is granted for an indefinite period, and the application process appears to be accomplished through ministerial acts only. *See* Joint Act of 2015, *infra* at Endnote viii; *Maharaj*, 450 F.3d at 977. Even if the DHS meets its burden of showing an offer of firm resettlement, a respondent may still establish that they meet one of the exceptions to the firm resettlement bar. *See* Section III.D., *infra*.

**C. “Refugee Protocol” Beneficiaries under Article 21 of the Refugee Law Have Likely Received an “Offer of Firm Resettlement,” But May Not Be Firmly Resettled.**

Haitians who had applied for refugee status prior to January 13, 2012, and were in Brazil in November 2015 (when the Ministries of Labor and Justice announced a process for applying

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for permanent residence for Haitians as a class), received an offer of firm resettlement if their name was on the list that was published. *See Matter of A-G-G-*, 25 I&N Dec. at 502. If their name was not on the published list, DHS cannot meet its burden of proving that an offer was made. As above, even if the DHS meets its burden of showing an offer of firm resettlement, a respondent may still establish that they meet one of the exceptions to the firm resettlement bar. *See* Section III.D., *infra*.

#### **D. Exceptions to a Finding of Firm Resettlement**

Many Haitians may be able to rebut a presumption of firm resettlement based on the “restrictive conditions” exception to the bar, given the hostile and xenophobic conditions in Brazil that the Brazilian government has not controlled. *See* 8 C.F.R. § 1208.15(b). Haitians are experiencing racial and national-origin discrimination that is affecting their ability to enjoy equal access to employment,<sup>xvii</sup> housing<sup>xviii</sup> and property rights,<sup>xix</sup> education, travel, public benefits (including access to medical care), free speech,<sup>xx</sup> and personal freedom from xenophobic violence by Brazilian citizens.<sup>xxi</sup> The government has not adequately protected them against such violence and discrimination.<sup>xxii</sup> This anti-Haitian violence and discrimination in Brazil may be considered “conditions of his or her residence in that country [that] were so substantially and consciously restricted by the authority of the country of refuge that he or she was not in fact resettled.” 8 C.F.R. § 1208.15(b); *See, e.g., Abdille v. Ashcroft*, 242 F.3d 477 (3rd Cir. 2001).

#### **E. The “Firm Resettlement” Bar Cannot Bar Asylum Where an Asylum-Seeker Has a Continuing Well-Founded Fear of Persecution in the Third Country.**

Firm resettlement does not preclude asylum applicants from establishing that events following resettlement constitute past persecution or create a well-founded fear of future

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persecution, entitling them to asylum as refugees from the country of resettlement. *See Abdille v. Ashcroft*, 242 F.3d 477 (3rd Cir. 2001). Where a respondent can show that they have been persecuted in Brazil in the past, or have a well-founded fear of being persecuted in the future in Brazil, and that the Brazilian government is unable or unwilling to protect them, this would support a finding that they have not been firmly resettled there. *Siong v. INS*, 376 F.3d 1030, 1040 (9th Cir. 2004) (Laotian of Hmong ethnicity who became a citizen of France but who is targeted by Laotian communists for his previous CIA work is not firmly resettled in France if his is seeking asylum from France).

## VI. CONCLUSION

Haitian citizens who received a humanitarian visa under Normative Resolution No. 97 should not be considered “firmly resettled” because the visa is temporary and imposes conditions that preclude it from being an offer for indefinite residence in Brazil. Even if it is found to be an offer, Haitian citizens have not been “firmly resettled” because they can meet the “restrictive conditions” exception to the bar.

Haitian citizens who were living in Brazil without lawful status and were either granted or simply offered the opportunity to apply for permanent resident status under the Joint Act of November 2015, may be found to have received an “offer of permanent resettlement.” However, given the restrictive conditions for Haitians living in Brazil, they may be able to meet an exception to the bar.

Haitian citizens who applied for refugee status before January 13, 2012 and received a refugee protocol and work permit may be found to have received an offer of firm resettlement through the 2015 Joint Act if their names were on the list published by the Ministry of Justice.

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However, if their names were not on the list, it is possible that DHS cannot meet its burden.

Further, they may be able to meet an exception to the bar, given the restrictive conditions for Haitians living in Brazil.

## ENDNOTES

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<sup>i</sup> See Bureau of Democracy, Human Rights and Labor, U.S. Dep't of State, *Country Reports on Human Rights Practices for 2010: Haiti*, at <https://www.state.gov/documents/organization/160458.pdf> (accessed April 3, 2017) (In 2010, "Human rights problems included allegations of extrajudicial killings by Haitian National Police (HNP) officers, findings of excessive use of force against prisoners, ... an inefficient judiciary subject to significant influence by the executive and legislative branches, severe corruption in all branches of government, violence and societal discrimination against women, child abuse, human trafficking, and ineffective enforcement of worker rights.").

<sup>ii</sup> Adaleberto Neto, O GLOBO, "Haitians seek better living conditions in Rio," (Nov. 1, 2015), at <http://oglobo.globo.com/rio/bairros/haitianos-buscam-melhores-condicoes-de-vida-no-rio-17924796#ixzz4cpY8Lc77> (accessed Mar. 29, 2017).

<sup>iii</sup> Jayesh Rathod and João Guilherme Casagrande Granja, "Haitian migration to U.S.: Learn lessons from Brazil," ORLANDO SENTINEL (Dec. 10, 2016), at <http://www.orlandosentinel.com/opinion/os-ed-haiti-migration-lessons-from-brazil-121016-2-20161210-story.html> (accessed Mar. 29, 2017).

<sup>iv</sup> Presidency of the Republic, Civil House, Sub-Office for Legal Affairs, LAW No. 9.474, OF JULY 22, 1997, at [http://www.planalto.gov.br/ccivil\\_03/leis/L9474.htm](http://www.planalto.gov.br/ccivil_03/leis/L9474.htm) (accessed Mar. 29, 2017).

<sup>v</sup> Ricarte de Oliveira, R. B., *A Proteção Integral Do Migrante Haitiano No Brasil: Uma Análise Situacional Do Visto Humanitário* ("The Integral Protection of The Haitian Migrant in Brazil: A Situational Analysis of the Humanitarian Visa"), at <http://www.publicadireito.com.br/artigos/?cod=7575c8affdb79557> (accessed Mar. 29, 2017).

<sup>vi</sup> Veran, J. et al, *Nem Refugiados, nem Migrantes: A Chegada dos Haitianos à Cidade de Tabatinga (Amazonas)* ("Neither Refugees, nor Migrants: The Arrival of Haitians to the City of Tabatinga (Amazonas)"), DADOS—REVISTA DE CIÊNCIAS SOCIAIS, RIO DE JANEIRO, vol. 57, no. 4, 2014, pp. 1007 a 1041, available at <http://dx.doi.org/10.1590/00115258201431> (accessed March 29, 2017).

<sup>vii</sup> Resolução Normativa CNIG No. 97, de 12 de Janeiro de 2012, at <http://pesquisa.in.gov.br/imprensa/jsp/visualiza/index.jsp?data=13/01/2012&jornal=1&pagina=59&totalArquivos=112> (accessed March 29, 2017).

<sup>viii</sup> Ministério do Trabalho e Previdência Social, Ministério da Justiça, Despacho Conjunto, Nov. 11, 2015, at <http://voce.mj.gov.br/lista1.pdf> (accessed March 29, 2017).

<sup>ix</sup> *Ministry of Justice extends deadline for Haitian registration* (Nov. 11, 2016), at <http://agenciabrasil.ebc.com.br/direitos-humanos/noticia/2016-11/ministerio-da-justica-prorroga-prazo-para-registro-de-haitianos> (accessed March 29, 2017).

<sup>x</sup> *Government extends deadline for stay of Haitians in Brazil* (Jan. 23, 2017), at <http://agenciabrasil.ebc.com.br/geral/noticia/2017-01/governo-prorroga-prazo-para-haitiano-tirarem-visto-permanente-no-brasil> (accessed March 29, 2017).

<sup>xi</sup> *Id.*

<sup>xii</sup> Mendonca, H., EL PAIS, "In one year, 1.9 million Brazilians lost their jobs" (Dec. 29, 2016), at [http://brasil.elpais.com/brasil/2016/12/29/economia/1483014093\\_875148.html](http://brasil.elpais.com/brasil/2016/12/29/economia/1483014093_875148.html) (accessed April 3, 2017).

<sup>xiii</sup> *Id.*

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<sup>xiv</sup> Oliveira, A., O GLOBO, “Unemployed can wait up to a year to get a replacement” (Mar. 3, 2017). At <http://g1.globo.com/hora1/noticia/2017/03/desempregado-pode-esperar-ate-um-ano-para-conseguir-uma-recolocacao.html> (accessed April 3, 2017).

<sup>xv</sup> Associated Press, “Haitian immigrants' 'Brazilian dream' sours as work hard to find for tens of thousands” (Mar. 2, 2015), at <http://www.foxnews.com/world/2015/03/02/haitian-immigrants-brazilian-dream-sours-as-work-hard-to-find-for-tens.html> (accessed April 3, 2017) (“Bernado Franck has spent the past year trying to establish himself in Brazil. While he practiced law in his hometown of Saint-Marc, he’s found that landing any job in Brazil is hard, let alone one with salary he can live on. He’s been out of work for the last four months.”).

<sup>xvi</sup> Da Silva, S.A., *Brazil, a new Eldorado for Immigrants?: The Case of Haitians and the Brazilian Immigration Policy*, Urbanities, Vol. 3, No.2 (Nov. 2013), at [http://www.anthrojournal-urbanities.com/docs/tableofcontents\\_5/2-Sidney%20Antonio%20da%20Silva.pdf](http://www.anthrojournal-urbanities.com/docs/tableofcontents_5/2-Sidney%20Antonio%20da%20Silva.pdf) (accessed April 3, 2017).

<sup>xvii</sup> Dady Chery, “Haiti’s Lead Export: Brazil’s New Slaves,” Global Research: Centre for Research on Globalization (reposted from its original site) (Dec. 19, 2015), at <http://www.globalresearch.ca/haitis-lead-export-brazils-new-slaves/5496837> (“In the current recession that has seen the loss of more than 385,000 construction jobs in 2015 alone, and the atmosphere of racism that pervades Brazil, [the offer of permanent residence through the 2015 joint act] is unlikely to do much to improve the lot of the 70 percent of Haitian workers who toil in Brazil without a work contract. Most such workers earn so little that they can barely send money home and eat enough calories to stay alive. Furthermore this decision by the Brazilian government will leave some 32,000 Haitians without permanent residence to the continued ruthless exploitation of Brazilian subcontractors.”) (accessed Mar. 31, 2017).

*See also* Benoit-Guyod, Simon, “Life in Brazil Isn't the Paradise Haitian Immigrants Think It Will Be” (Mar. 11, 2014), at [https://www.vice.com/en\\_us/article/life-in-brazil-isnt-the-paradise-haitian-immigrants-think-it-will-be](https://www.vice.com/en_us/article/life-in-brazil-isnt-the-paradise-haitian-immigrants-think-it-will-be) (“As in other countries with large immigrant populations, this cheap workforce is frequently abused.”) (accessed Mar. 31, 2017).

<sup>xviii</sup> Associated Press, “Haitian immigrants' 'Brazilian dream' sours as work hard to find for tens of thousands” (Mar. 2, 2015), at <http://www.foxnews.com/world/2015/03/02/haitian-immigrants-brazilian-dream-sours-as-work-hard-to-find-for-tens.html> (accessed April 3, 2017) (“Trying to survive on sporadic and meager incomes, most crowd into shared rooms amid the poorest slums ringing cities such as Sao Paulo.”).

*See also* Benoit-Guyod, Simon, “Life in Brazil Isn't the Paradise Haitian Immigrants Think It Will Be” (Mar. 11, 2014), at [https://www.vice.com/en\\_us/article/life-in-brazil-isnt-the-paradise-haitian-immigrants-think-it-will-be](https://www.vice.com/en_us/article/life-in-brazil-isnt-the-paradise-haitian-immigrants-think-it-will-be) (“Some houses host more than a dozen Haitians, who share every expense and a very restricted living space.”).

<sup>xix</sup> *See* Art. 106 of Law 6,815, restricting property rights of “foreigners.”

<sup>xx</sup> *See* Art. 107 of Law 6,815 (“The foreigner admitted in the national territory cannot exercise political activity nor interfere, directly or indirectly, in the public affairs of Brazil.”).

<sup>xxi</sup> *See, e.g.*, TELESUR, “Haitian Immigrants Victims of Xenophobic Attacks in Brazil” (Aug. 9, 2015), <http://www.telesurtv.net/english/news/Haitian-Immigrants-Victims-of-Xenophobic-Attacks-in-Brazil-20150809-0002.html> (“...[S]even Haitian immigrants were shot last week Saturday in two separate attacks in the city center, including one nearby a religious organization housing immigrants... The victims said that before they got shot the attackers yelled at them “Haitians, you steal our jobs!” They further reported that they were also discriminated against in the public hospital, saying doctors refused to attend them. The seven Haitians, including one woman, were wounded in the hip and legs.”) (accessed Mar. 31, 2017).

<sup>xxii</sup> Jayesh Rathod and João Guilherme Casagrande Granja, “Haitian migration to U.S.: Learn lessons from Brazil,” ORLANDO SENTINEL (Dec. 10, 2016), at <http://www.orlandosentinel.com/opinion/os-ed-haiti-migration-lessons-from-brazil-121016-2-20161210-story.html> (accessed Mar. 29, 2017).

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