

21 February 2014

Stefanie K. Davis  
Assistant General Counsel  
Legal Services Corporation (LSC)  
3333 K Street NW  
Washington, DC 20007  
(via electronic submission to Regulations.gov)

Re: Further Notice of Proposed Rulemaking as to 45 CFR § 1626.4(c), Restrictions on  
Legal Assistance to Aliens

Dear Assistant General Counsel Davis:

I am writing to offer my comments on the LSC's proposed rule regarding some non-citizens' eligibility for legal assistance. I am especially grateful for the opportunity to comment on this issue because I am a law student who is very interested in immigration and human rights issues. I have assisted survivors of domestic violence as they sought protection in the United States, and I am familiar with the dangers facing victims of human trafficking.

While I believe that the LSC's proposed rulemaking is a progressive step, I do not believe these changes go far enough. For the reasons discussed below, 45 CFR § 1626.4(c)(2)(ii) should expressly extend LSC's services to non-citizens who are present in the United States because they are assisting with an investigation or adjudic

*The term “in the United States” applies to victims of the qualifying crimes, regardless of whether the crime itself occurred in the United States.*

As the LSC notes in its FNPRM, Congress directed the agency to “expand benefits and services to victims of severe forms of trafficking in persons in the United States, without regard to the immigration status of such victims.” 22 U.S.C. § 7105(b)(1)(B). In 22 U.S.C. § 7105(b)(1)(A), Congress clearly noted that “an alien who is a victim of a severe form of trafficking in persons . . . shall be eligible for