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# Framing Citizenship: Media Coverage of Anti-deportation Cases Led by Undocumented Immigrant Youth Organisations

Caitlin Patler and Roberto G. Gonzales

*Recent literature elucidates the ways in which news coverage of immigration and immigrants reflects, as well as shapes, discourse on citizenship, rights and belonging. Scholars find that undocumented immigrants are particularly vulnerable to media representations of illegality that reinforce bounded citizenship. However, more positive representations of certain groups of undocumented immigrants have emerged in recent years. This article draws upon content analysis of English-language print and online coverage of undocumented immigrants whose anti-deportation campaigns were led by national undocumented youth organisations in the USA. We find that campaigns for undocumented students were more likely to receive coverage than those of non-students. Regardless of a mention of educational status, articles included pro-immigrant quotes four times more frequently than anti-immigrant quotes. News coverage of anti-deportation cases represented citizenship in three related ways: citizenship as acculturation, citizenship as civic engagement (or ‘good citizenry’) and deservingness vis-à-vis victim status. We conclude that the media regularly expose the public to understandings of citizenship and membership that go beyond nationality, in ways that express empathy for particular immigrants during the enforcement (implementation) stage of the policy process. However, selective representations of citizenship may ultimately reinforce public support for restrictionist policies.*

*Keywords: Undocumented Immigrants; Citizenship; Deportation; Media*

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Caitlin Patler, Ph.D., University of California President’s Postdoctoral Fellow, Department of Criminology, Law and Society, University of California, Irvine, CA, USA. Roberto G. Gonzales, Assistant Professor, Harvard Graduate School of Education, Harvard University, MA, USA. Correspondence to: Caitlin Patler, Department of Criminology, Law and Society, University of California, Irvine, 2340 Social Ecology II, Irvine, CA 92697. Email: [c.patler@ucla.edu](mailto:c.patler@ucla.edu).

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## Background

Since 1965, increasingly restrictive US immigration laws have created a large and settled population of undocumented immigrants, peaking at over 12 million individuals, and composing nearly a third of the foreign-born population of the USA (Passel and Cohn 2011). Dramatic increases in immigration law enforcement measures have refuelled debates regarding who can be a citizen as well as what constitutes membership in the nation. Dichotomous conceptions of citizenship and legality have provided the impetus to justify a proliferation of border policies and interior enforcement efforts (Ngai 2004). In turn, these policies further reinforce narrow definitions of belonging (Kanstroom 2007). Undocumented immigrants, in particular, have faced scrutiny and negative sentiment due to their unauthorised status.

Recent literature elucidates the ways that media coverage of immigration and immigrants not only reflects, but also creates and shapes, public discourse on citizenship in the USA. This scholarship shows that the media generally position immigrants and their offspring as 'others', incapable of complete inclusion in the national fabric. The same exclusive notions of belonging are employed repeatedly during debates about immigration policy-making, in terms of both immigrant admissions and rights.

On the other hand, literature on activism against deportation has documented a contingent acceptance of certain groups of undocumented immigrants at particular times. While debates about immigration policy-making tend to focus on keeping access to the nation selective (Redden 2011) or on preserving access to resources, debates about immigration law enforcement (in particular, deportation) can be more expansive. In an attempt to justify individual immigrants' right to remain in the territory, anti-deportation case mobilisation often includes arguments emphasising long-time community membership, belonging and rights. Empirical studies from Europe and the USA show that organised publics mobilise humanitarian claims for inclusion at the implementation (or enforcement) stage of the policy-making process—and that politicians and immigration enforcement officials respond to such mobilisations (Ellermann 2009; Freedman 2011; Anderson, Gibney, and Paoletti 2011). However, this literature pays little attention to the media's coverage of anti-deportation cases and what this coverage can teach us about the regurgitation and dissemination of public opinion about citizenship.

In this article, we analyse English-language news coverage of undocumented youth and adults in deportation proceedings in the USA whose public anti-deportation campaigns are coordinated by two national organisations of undocumented students. We examine which cases receive coverage, as well as the content of such coverage. We find that campaigns focusing on undocumented immigrant students are more likely to receive coverage than those for non-students. Across the board, we find evidence that articles covering anti-deportation campaigns express sympathy for campaign subjects rather than the negative sentiments documented in previous research on

media portrayals of immigrants. Indeed, articles include pro-immigrant quotes more than four times as frequently as anti-immigrant quotes. Our content analysis of media coverage reveals three consistent representations of citizenship: citizenship as acculturation, citizenship as civic engagement and deservingness of rights vis-à-vis victim status. Such representations provide evidence of empathy for certain immigrants during the implementation stage of the policy cycle—in this case, the enforcement of deportation law.

We aim to contribute to the literature in several ways. The role of the media remains under-explored in scholarship on the immigration policy process that has focused largely on the actions of government bureaucrats, elite politicians and organised publics. We add to this scholarship by analysing how and to what extent notions of citizenship, membership and belonging appear (or are reflected) in news coverage of anti-deportation campaigns. We also explore for *whom* such coverage appears. In doing so, we observe how ideologies of citizenship are deployed by the news media during the implementation stage of the policy cycle. In addition, by documenting the overwhelmingly positive coverage of select anti-deportation cases, our work may provide a parallel narrative to the nativist sentiment that has been observed by other researchers. Our research also adds a US case to an emerging field of literature from European countries: though anti-deportation campaigns are a ‘ubiquitous feature’ in Europe (Anderson, Gibney, and Paoletti 2011, 558), they are relatively unexplored in the USA. Finally, our results indicate that selective sympathetic sentiments towards certain groups of immigrants in deportation proceedings demonstrate expansive notions of citizenship that go beyond nationality. However, the selective attribution of citizenship-esque qualities to certain groups may simultaneously reinforce restrictive attitudes towards immigration in general.

### **Media Discourse on Immigrants and Immigration**

Recent literature on mainstream media’s coverage of immigration finds that immigrants and their offspring are greatly undercovered in the media, relative to their population size (Santa Ana 2013). When they do receive coverage, immigrants (especially Latinos) are most often portrayed as threatening, burdensome and incapable of integrating (Santa Ana 1999, 2002; Chavez 2008). Embedded in this coverage are normative as well as legal conceptions of what it means to be a citizen in the USA. Negative portrayals of certain immigrants as undeserving of full membership in the national community emphasise a divide based on formal legal membership in a state, as well as on social membership in a nation. The divisions between normative notions of citizens and non-citizens widen for immigrant groups that are more likely to be perceived as ‘illegal’ (Dunaway et al. 2011).

While negative portrayals of immigrants have been documented across print, radio and broadcast media, the particular tone and quality of this coverage is not uniform. Conservative news outlets are more likely to promote negative images of immigrants as well as to cover or express viewpoints favouring restrictive policies regarding

immigrant admissions and rights (de Zuniga, Correa, and Valenzuela 2012; Branton and Dunaway 2009). And this media coverage matters: research from across national contexts demonstrates that viewpoints and tones expressed in news can influence the attitudes of media consumers in regard to immigrants and immigration (Dunaway et al. 2011; de Zuniga, Correa, and Valenzuela 2012; McKay, Thomas, and Kneebone 2012; Gilbert 2013; Boomgaarden and Vliegenthart 2009; Welch et al. 2011). For example, in an analysis of national survey data, Welch et al. (2011) found that the perception of Latinos in the USA as criminals was significantly correlated with support for more punitive crime control measures. Though existing literature suggests that negative coverage far overshadows positive coverage of immigrants, some positive representations have been documented. For example, Haines and Rosenblum (2009) found that asylum seekers received solidly positive news coverage in Richmond, VA. In addition, Kerevel (2011) documents a link between Spanish-language media consumption and pro-immigrant attitudes.

### Discourse across Stages of the Policy Process

Much of the literature has focused on coverage during the policy-making stage of the policy process. For example, in a study of media portrayals of Mexican immigrants in Canada, Gilbert found that the media coverage of the ‘immigration crisis’ mirrored the language used by the government to implement more restrictive visa policies for Mexicans (Gilbert 2013). In the USA, anti-immigrant narratives expressed through news media have helped to block pro-immigrant state laws such as access to in-state college tuition (Jefferies 2009), as well as to limit driving rights for undocumented immigrants and set the stage for some of the most punitive laws in the country (Stewart 2012). These researchers conclude that the mass media helps to shape public agendas around pressing social issues (Andrews and Caren 2010).

Far less, however, is known about media portrayals of immigrants during the *implementation* stage of the immigration policy cycle. By turning to deportation—the last step in the policy implementation process—we hope to shed light on implementation processes and how they might evoke a different public sentiment. Deportation is an important area of study in that it symbolises the ultimate and final act of restriction: implementing laws that decisively exclude someone from legal and social citizenship (Anderson, Gibney, and Paoletti 2011). The literature reviewed above illustrates mass media’s negative framing of immigrants and their offspring, which has been linked to restrictive policy-making. Public opinion favouring restrictions on admissions and rights at the policy-making stage is perhaps unsurprising: as Ellermann argues, at this stage of the policy process, the costs constituents of immigration enforcement are concentrated on a select few, while the benefits are diffused (2009, 2005). In addition, because their constituents tend to favour stronger enforcement, legislators ‘face strong incentives to endorse proregulatory policies’ (Ellermann 2009, 15).

As the process turns to the implementation of immigration law enforcement policies, the costs of deportation become more salient. Indeed, deportation imposes extreme costs on deportees and their communities, even violently disrupting everyday life (Menjívar and Abrego 2012; De Genova 2002; Kanstroom 2007; Gonzales and Chavez 2012). It is at this implementation stage that public opinion changes as the costs of deportation are exposed (Ellermann 2009). While many immigrants suffer this plight far from the public eye (Bosworth 2011), high-profile cases in which organised publics mobilise for particular immigrants have garnered broad public attention (Statham and Geddes 2006; Anderson, Gibney, and Paoletti 2011; Freedman 2011; Patler 2012; Ellermann 2005, 2006, 2009). In a remarkable display of pro-immigrant mobilisation, communities and organisations stage anti-deportation campaigns, which highlight the attributes of certain immigrants in deportation proceedings. Politicians (including some who supported restrictive law-making) are susceptible to the humanitarian claims made by anti-deportation campaigns and, in some cases, will urge immigration officials to suspend the deportation. Depending on the level of political pressure, immigration bureaucrats will often refrain from pursuing the deportation (Ellermann 2009).

Anti-deportation cases mobilise notions of citizenship and community contributions as well as humanitarian concerns (Anderson, Gibney, and Paoletti 2011; Freedman 2011; Patler 2012). Drawing on the cases of asylees, Anderson et al. argue that anti-deportation campaigns allow organised publics to express normative notions of citizenship in which immigrants are acknowledged as contributing community members. In this way, notions of citizenship extend beyond (and sometimes trump) legal definitions. The production of deservingness and of 'good citizens' discourse has been documented in literature on claims-making by petitioners for humanitarian visas in the USA (Morando Lakhani 2013), as well as for New Sanctuary Movement families in the USA (Yukich 2013) and for the children of 'sans papier' in France (Freedman 2011).

### **Discretion in US Immigration Law**

Anti-deportation cases tap into the discretion within existing immigration laws. The US Supreme Court has acknowledged humanitarian considerations, ruling for example that while the state may exclude non-citizens, it may also choose to extend rights to certain groups of immigrants that demonstrate particular characteristics. In *Plyler v. Doe* (1982), the Supreme Court affirmed the right to K-12 education for undocumented children, citing their young age and lack of power in decisions to migrate as key to their innocence. Beyond the courtroom, procedural guidelines within the government's immigration enforcement arm have historically created a system of prioritisation around deportations (Meissner 2000; Morton 2011; Napolitano 2012). For example, these guidelines explain that individuals without criminal records are lower priority for deportation, as are those who came to the USA as children. In June 2011, for the first time, the Director of ICE included in the 'low

priority' category immigrants who had completed high school or college education in the USA. These changes corresponded to increases in activism around the DREAM Act as well as around anti-deportation case mobilisation.

In June 2012, President Obama announced a new procedural programme, the Deferred Action for Childhood Arrivals (DACA) programme, under which eligible undocumented youth could apply for deferred action from deportation as well as two years of work authorisation.<sup>1</sup> Though other temporary protected statuses have been issued to certain groups of immigrants over the years, this programme is the first to target undocumented youth. These changes suggest a valuation of citizenship as acculturation and suggest that there is something particular about student status that makes an immigrant more deserving of rights (or at least less deserving of deportation).

Existing literature on anti-deportation campaigns shows that the public and policy-makers are susceptible to more expansive notions of citizenship during the implementation stage of the policy process. Though the media is mentioned as a player in influencing public opinion and politicians in anti-deportation campaigns, this assumption is neither tested nor problematised. Our research begins to fill this gap by examining how the media portrays immigrants during the implementation stage of the policy process. Though community outcry over individual deportation cases has been previously documented (Ellermann 2009), to our knowledge, the organisations we tracked were some of the first in the USA to nationally coordinate anti-deportation case mobilisation. We analyse which anti-deportation cases receive coverage, as well as what notions of citizenship, membership and belonging are deployed in such coverage. Unlike other research that has documented negative media portrayals of undocumented immigrants, our results demonstrate almost exclusively positive coverage of certain undocumented immigrants in deportation proceedings. However, this coverage could serve to reify existing anti-immigrant sentiment demonstrated in previous research.

### Data and Methodology

This article is based on an analysis of print, radio and online news coverage of anti-deportation campaigns led by two main national organisations of undocumented youth: United We Dream (UWD) and Dream Activist (DA), as well as their local organisational affiliates. These organisations grew out of efforts to coordinate the activities of local campus- and community-based organisations and to amplify their work on a national scale. From 2009 to 2012, UWD and DA worked with local partners to mount over 130 anti-deportation cases, resulting in the successful win of release from detention, deferred action on deportation or stays of removal for the vast majority of immigrants they represented. Each campaign employs similar, coordinated tactics including extensive social media coverage of the case, as well as strategic targeting of politicians, immigration enforcement officials and the media.



We gathered data on 130 anti-deportation campaigns for undocumented individuals that took place between January 2009 and December 2012 by compiling action alerts released via email or publicised on the websites of UWD and DA. We created a database of cases that included information about the subject of the case including country of origin, student status and education level. We also noted whether the subject was living in a US state with existing laws or policies allowing (or barring) undocumented students to pay in-state tuition rates at public colleges and universities.<sup>2</sup> Such laws are highly contested and often mirror the type of local political climate (pro- or anti-immigrant) that could allow anti-deportation campaigns to garner—or lose—support from the public, the media and political elites.

Case background information allows us to make important comparisons between the individuals selected for anti-deportation cases. While our list may not be representative of all anti-deportation campaigns during this time period, it encompasses the types of cases that these organisations choose to promote. For example, our analysis includes students at varying educational levels (from high school to prestigious universities) as well as non-students who were, for example, low-wage workers or parents of US citizen children. Furthermore, though existing literature on anti-deportation campaigns from Europe has focused generally on refugees or children of ‘sans papiers’ (Statham and Geddes 2006; Freedman 2011), we focus primarily on individuals who were undocumented, usually by entering without inspection or staying on an expired visa.

In order to generate a list of media articles that covered the campaigns, we utilised a three-step process. First, we searched for each individual’s name within three major databases of published news articles: LexisNexis, ProQuest and Access World News. While no single database can generate a comprehensive list of all news, these three cover most major news outlets as well as many local outlets. Still, we note that our results might be different had we been able to comprehensively analyse all media outlets. We examined English-language news from print, radio, web and newswire sources, excluding blogs and press releases. When a name received a media hit, we cross-checked the results in each of the databases by including search terms for any word in the article containing ‘immigr’ or ‘deport’. Each article was coded along a series of indicators of representations of citizenship. To ensure consistency and intercoder reliability, each article was coded by the first author as well as by a research assistant. Results were analysed using Stata.

## **Findings**

We present the results of our research in three parts. First, we describe the anti-deportation case mobilisation, discussing which cases received coverage—and which did not. Second, we describe the news outlets and articles in our sample. Third, we present the results of the content analysis of the articles. We describe three ways that the media presented notions of citizenship, membership and belonging: citizenship as acculturation and civic engagement, and deservingness of membership vis-à-vis



victim status. We conclude with an analysis of how the articles presented two key social movement players in the anti-deportation campaigns: the organisations and political elites.

Table 1 describes the individual characteristics of the subjects of anti-deportation campaigns. Men were highly over-represented in the campaigns, making up 77% of the targets of the cases. This is perhaps unsurprising, given that men are more likely to face police scrutiny that can lead to arrest and ultimately deportation proceedings.

The USA is home to immigrants from around the world and the cases reflected this empirical reality. Anti-deportation campaigns were waged for immigrants from 26 countries across 5 continents. Thirty-two per cent of anti-deportation cases were for individuals from Mexico, followed by 8% from Guatemala and 5% from Colombia. In 14% of cases, the country of origin was not mentioned in any of the case information presented by the organisations or in news coverage.

Anti-deportation cases took place in 24 US states, most frequently occurring in Florida (23%), California (14%), Texas and Arizona (both with 6%). This state distribution reflects the traditional migrant-receiving states, with California, Texas

**Table 1.** Anti-deportation campaigns led by national undocumented youth organizations, 2009–2012.

	%	Received news coverage (%)
<i>Individual characteristics</i>		
Male	77	44
Female	23	47
Most frequent countries of origin <sup>a</sup>		
Mexico	32	49
Guatemala	8	50
Colombia	5	71
Unknown	14	0
Educational status		
Non-student	46	22
High school	8	40
Community college	16	62
University/prestigious university/graduate school	25	75
Unknown	2	0
<i>Campaign characteristics</i>		
Most frequent US state of campaign <sup>b</sup>		
Florida	23	37
California	14	44
Texas	6	88
Arizona	6	38
Political climate		
State has in-state tuition law/policy	35	58
State has policy banning in-state tuition	12	44
Sample size	130	58
Percentage of total		45

<sup>a</sup>Individuals came from 26 different countries on 5 continents.

<sup>b</sup>Individuals came from 24 different US states.

and Arizona sharing a border with Mexico. These states are also home to large undocumented immigrant populations. As a result, they have historically been sites of political contestation about the rights of the undocumented. Each of these states has attempted to pass strong anti-immigrant measures, while also experiencing a powerful pro-immigrant counter-current by community members and local organisations. Indeed, these areas are also home to a dense constellation of immigrant rights organisations, including undocumented youth organisations. Mainstream media generally covered between 35% and 45% of cases in these states, with the exception of Texas, where seven out of eight cases received coverage.

Interestingly, media coverage was higher for cases that took place in states with both anti- and pro-immigrant laws regarding in-state tuition for undocumented students. Although only 16 cases took place in a state with a law banning in-state tuition, 7 (44%) of these cases received coverage. Likewise, while 45 cases took place in states with pro-immigrant policies, 26 such cases (58%) received coverage. This may be due to the existing immigrant rights infrastructure in these states; for example, long-standing organisations are more likely to be able to garner the attention of politicians as well as national and local media.

For more than a decade, undocumented youth organisations have waged campaigns for the DREAM Act<sup>3</sup> and other pro-immigrant legislation that would benefit undocumented youth and students (Rincón 2008; Gonzales 2008; Seif 2004). While the focus of these organisations has expanded beyond the undocumented student population, students were the target of organising and policy work for many years. Not surprisingly, more than half of the cases in our sample focused on undocumented immigrant students: 8% were for high school students and more than 44% were for college students (in community college or universities). In contrast, 46% of cases focused on non-students; these individuals were often low-wage workers or undocumented parents with US citizen children.

There is a stark difference between the coverage of anti-deportation cases for students versus non-students. Though non-students made up 46% of the campaigns, only 13 cases (22%) received news coverage. In contrast, 62% of community college students and 78% of university students received coverage, though their cases were only 16% and 25% of the total, respectively. This suggests a preference by the media to tell the stories of immigrants most likely to be perceived as 'acculturated'.

Of the 130 cases we tracked, 45% received media coverage. Coverage ranged between 1 and 13 articles per case.<sup>4</sup> Table 2 describes the news outlets and articles that covered anti-deportation campaigns. Our search resulted in 185 news articles in 66 different outlets. Sixty-three per cent of coverage appeared in media outlets with local distribution. Popular local newspapers such as the *Los Angeles Times*, the *New York Times* and the *Washington Post* accounted for 13% of articles. Thirty-one per cent of articles appeared in national media such as *CNN* or the *Associated Press (AP)*.

We now turn to the results of the content analysis of news articles covering anti-deportation campaigns. As demonstrated by literature across several disciplines, the media tends to reflect, as well as shape, popular and political notions of citizenship

**Table 2.** News coverage of anti-deportation campaigns led by national undocumented youth organizations, 2009–2012.

	Frequency
Distribution	
Local	63%
National	31%
International	7%
Type of outlet	
Print (paper/web <sup>a</sup> )	98%
Radio	2%
Average word count	836
Number of outlets	66
Number of articles	185

Source: LexisNexis, ProQuest and Access World News databases.

<sup>a</sup>Includes only published articles; blogs and press releases excluded.

(Chavez 2001, 2008; de Zuniga, Correa, and Valenzuela 2012; Dunaway et al. 2011; De Genova 2011; Redden 2011). The news articles we analyse overwhelmingly portray the subject of anti-deportation campaigns as deserving of the right to stay, regardless of immigration status. Indeed, our content analysis reveals three clear ways that the media presents citizenship in these cases: citizenship as acculturation, citizenship as civic engagement (or ‘good citizenry’) and deservingness of membership vis-à-vis suffering or victimisation. Tables 3, 4 and 5 present the ways that the media articles we examined present these broad conceptualisations of citizenship.

**Table 3.** News presentation of citizenship as acculturation.

	%
<i>Article mentions</i>	
Student status	89
Type of school attending	
No school	17
High school	10
Community college	17
University	36
Prestigious university <sup>a</sup>	12
Multiple	8
Educational accomplishments	54
‘Feel American/Like everyone else’	16
Total number of articles	185

Source: LexisNexis, ProQuest and Access World News database search of 130 anti-deportation cases, 2009–2012.

<sup>a</sup>Ivy League, university honours programmes and graduate school.

**Table 4.** News presentation of citizenship as civic engagement.

	%
<i>Article mentions</i>	
Volunteering or community involvement (sports/church, etc.)	41
'Good worker' or 'works hard'	21
Total number of articles	185

Source: LexisNexis, ProQuest and Access World News database search of 130 anti-deportation cases, 2009–2012.

**Table 5.** News representation of victimhood/deservingness.

	%
<i>Article mentions</i>	
Childhood arrival to USA	79
Individual was 'brought' to USA	47
Family would suffer if deported	49
Individual would suffer in/'doesn't know' country of origin	36
How arrested/got into deportation proceedings	
No mention	43
Routine traffic violations	17
Other crimes (DUI, etc.)	4
ID check on transportation (airports/buses)	3
Raid on job or in home	3
Family became deportable	17
Other (including asylum denial)	12
Tone of article	
Includes quote from supporter/pro-immigrant quote	81
Includes quote from opponent/anti-immigrant quote	18
Total number of articles	185

Source: LexisNexis, ProQuest and Access World News database search of 130 anti-deportation cases, 2009–2012.

### *Citizenship as Acculturation*

Literature on the children of immigrants frequently cites educational trajectories and degree attainment as indicators of immigrant integration (Telles and Ortiz 2008; Portes and Rumbaut 2001; Zhou et al. 2008; Kasinitz, Mollenkopf, and Waters 2008). To test whether media coverage of anti-deportation cases reflected these values, we first coded a mention of the subject's status as a student, as well as if the type of school was mentioned (high schools vs. universities, for example). As Table 3 demonstrates, nearly 90% of news articles mentioned education or educational status. In addition, 83% of the articles mention the individual's level of schooling and more than half (54%) mention a specific educational accomplishment—for example, getting good grades, passing Advanced Placement tests or receiving a scholarship.

Feelings of membership and belonging are a more subjective indicator of acculturation (Brubaker 1989; Perez 2009; Gonzales 2011). Gonzales (2011) finds

that many undocumented youth are so imbedded in US institutions that they report 'feeling American'. We analysed how frequently news articles mentioned the subject as 'feeling American' or 'feeling like everyone else' (but for status). Thirty articles (16%) mention such a sentiment, usually through direct quotes from the subjects as well as their supporters.

The following AP from December 2010 demonstrates coverage of the case of Bernard Pastor, invoking several of the qualities that characterise 'citizenship as acculturation':

Pastor graduated from ... High School as an *honors student* and star soccer player and says he *considers himself an American*, with few ties left to the homeland he left as a 3-year-old child. (AP, 21 December 2010)

### *Citizenship as Civic Engagement*

Existing scholarship shows that immigrants (including the undocumented) exhibit high levels of civic engagement, despite lacking access to formal political rights such as voting (Delgado 1993; Varsanyi 2005; Terriquez 2011). Our analysis tested how often news sources mentioned various indicators of civic engagement. We coded articles for a mention of volunteering and community involvement such as church attendance, participation on a sports team or other non-academic achievements. As Table 4 shows, 41% of articles mentioned that the individual was involved in their community in some way. For example, the AP describes Bernard Pastor as a 'star soccer player' (AP, 21 December 2010). A *Contra Costa Times* story about the anti-deportation campaign of Mandeep Chahal also demonstrates the sentiment behind 'citizenship as civic engagement':

Students at [Chahal's high school] voted to name Chahal the classmate 'Most Likely to Save the World', a reflection of her bright personality, academic ambition and interest in helping others locally and *worldwide*. 'That [vote] was a landslide', [Chahal's best friend said] ... 'That's really how she's known in our community'. (*Contra Costa Times*, 1 October 2009)

This type of coverage alludes to a more expansive definition of 'good citizenship' than a divide based solely on legal documentation.

The USA, along with other liberal democracies, is known for its widely held belief in meritocracy. Pro-immigrant organisations have deployed this theme time and time again to promote the rights of immigrants, particularly immigrant workers. Common tropes such as 'immigrants just come here to work' or 'immigrants are hard workers' reflect such a sentiment. We coded the news coverage of anti-deportation cases for statements or allusions to individuals as hard workers and found that 21% of the articles used the phrase 'hard worker' or 'works hard' explicitly. The presentation of immigrants as hard workers reflects more than just citizenship as an objective legal status or a nationality. It also reflects what it means to be a particular type of citizen—a 'good' citizen.

*Deserving, Innocent and Victimised*

Existing scholarship has illustrated how both legal advocates and organised publics have worked to portray certain immigrants as victims in order to promote their right to remain in the territory (Freedman 2011; Morando Lakhani 2013; Yukich 2013). Our analysis also suggests that particular circumstances or sets of attributes make certain immigrants appear more deserving of the right to remain. This deservingness is often portrayed vis-à-vis descriptions of the immigrant as a victim, blameless for their legal status. For example, 17% of articles mentioned that the individual ended up in deportation proceedings due to routine traffic violations, and another 6% due to immigration checkpoints or raids on homes, workplaces or public transportation. For example, the following quote appeared as the first line of an *AP* story about the anti-deportation campaign of an undocumented student from the state of Washington: 'All it took was a wrong turn for Jorge-Alonso Chehade to face deportation' (*Contra Costa Times*, 1 October 2009). The inference is that deportation is an extraordinarily harsh punishment for something as minor as routine traffic violations. Raids and checkpoints were similarly portrayed as surprise assaults on the immigrants in question, furthering a sense of empathy for the individuals involved.

News media articles also present undocumented youth in deportation proceedings as innocent victims who are in legal limbo for reasons beyond their control. These sentiments are reflected in the *Plyler v. Doe* decision, as well as DHS and ICE guidelines for the prioritisation (or de-prioritisation) of certain deportations from 2011 and 2012. For example, 79% of articles mentioned that the individual had arrived in the USA as a child or had spent a significant portion of their childhood or youth in the USA. Forty-seven per cent of articles mentioned explicitly that the individual was 'brought' to the USA by family or friends, thereby presenting a lack of choice (innocence) regarding the decision to migrate in the first place. The subheading of a June 2010 *Los Angeles Times* story makes this clear: 'Thousands of young illegal immigrants were brought to the U.S. as children and have gone on to college' (*Los Angeles Times*, 28 June 2010). A *Philadelphia Inquirer* article from June 2011 included the following quote from 'a lay leader of the Hispanic Ministry of Delaware County':

She came here as a minor, what I would still consider a child ... When I was 14, I didn't have a heck of a lot of say about where I was going if my parents were dragging me. Zulma was just doing what her parents said. (*Philadelphia Inquirer*, 13 June 2011)

This quote and others like it take the blame for unauthorised status off the individual and put it on his or her parents. As we will discuss later, although such representations build sympathy for the individual, they can also be problematic. Many articles mentioned the young age of the immigrants upon arrival; for example, the *AP* article quoted above states that Bernard Pastor had 'few ties left to the homeland he left as a 3-year-old child' (*AP*, 21 December 2010).

News articles also told stories of the interpersonal costs of deportation, exposing notions of innocence and suffering (and by default, a sense that individuals should not be deported). Thirty-six per cent of articles mentioned that the individual is unfamiliar with his or her country of origin or that he or she would suffer in some way if deported to that country. In a more dramatic example, a Nigerian immigrant whose father had been murdered in Nigeria was quoted in a *Seattle Times* story:

‘My mother [who was deported] is living in hiding in Nigeria. I don’t want that life for me’, Okere said ... ‘I’m 21. I want to be a doctor’. (*Seattle Times*, 4 February 2012)

Forty-nine per cent of articles also mentioned that family or friends in the USA would suffer if the individual were deported, demonstrating that undocumented immigrants are imbedded in their communities in the USA. These findings suggest that the longer someone resides in the country, the more he or she becomes a *member* of the nation. In an example of the rarer coverage of immigrants who are not students, a July 2012 *South Florida Sun-Sentinel* article quoted the pregnant wife of an immigrant who was arrested and detained after failing to pay traffic tickets: “Obviously, I need my husband,” [the wife] said, “It’s totally overwhelming. I worry about worrying because stress is bad when you’re pregnant. I have very little support” (*South Florida Sun-Sentinel*, 17 July 2012). This article invokes the victim status of the detainee (by mentioning his only crime as a lack of payment of traffic tickets), as well as that of his pregnant wife and, by default, their unborn US citizen child.

#### *Article Tone*

We coded articles for the presence of direct quotes from supporters (those opposing the deportation or supporting immigrants in general) and from opponents (those supporting the deportation or opposing immigration or immigrant rights in general). The results show a vast difference in frequency of these types of quotes: pro-immigrant quotes appeared four times more frequently than anti-immigrant quotes (81% versus 18%, respectively). Articles included a range of supportive quotes from friends, community members and teachers to clergy, attorneys, leaders of national civil rights organisations, university presidents and Members of Congress. A June 2010 *Los Angeles Times* article included the following quote from a high school teacher of Carlos Robles, who had been arrested with his brother on an Amtrak train:

‘Gee whiz, these are just two quality kids’, [the high school teacher] said. They are everything you would want your kids to be. These kids are going to be leaders in their communities—taxpayers, not tax recipients. (*Los Angeles Times*, 28 June 2010)

This quote expresses support for Robles yet at the same time makes a normative assumption about the kind of person ‘deserving’ of the right to remain—‘taxpayers, not tax recipients’. Such quotes, while in favour of the individual, can also serve to reify existing parameters of citizenship and membership.



Interestingly, while the majority of pro-immigrant quotes were about the individual, anti-immigrant quotes tended to critique immigration in general and very rarely attacked the individual (or if so, did so cautiously). For example, a May 2010 *New York Times* article describes the case of Kennesaw State university student Jessica Colotl. The last two sentences of the article include a quote from a representative of a conservative organisation:

‘No exception should be made, *however admirable the offender*’, said Phil Kent, a spokesman for Americans for Immigration Control, a national group opposed to illegal immigration. ‘Ironically, she says she wants to go on to law school, but she’s undermining the law’, Mr. Kent said. What’s the point of educating an illegal immigrant in a system where she can’t hold a job legally or get a driver’s license? (*New York Times*, 15 May 2010, emphasis added)

This quote suggests that activists on both sides of the issue are aware of the presentation of individuals in deportation campaigns as accomplished students, as well as victims, and play to that framing.

### *Organisations and Politics*

We also included measures of social movement actors and outcomes: whether the article mentioned undocumented youth organisations or other organisations, whether the article mentioned a supportive politician and whether coverage included information on broader policy proposals to reform immigration law. [Table 6](#) describes these findings.

We find that news articles rarely focused on the individual’s story alone. Instead, the plight of the individual was linked to current or past proposals to change existing immigration laws. Fifty-nine per cent of the articles mentioned the DREAM Act and 74% mentioned comprehensive immigration reform. As such, media coverage of

**Table 6.** News coverage of politics and social movement organizations.

	%
<i>Article mentions</i>	
DREAM Act	59
Comprehensive immigration reform	74
Support from a politician	23
Support from an organisation	65
UWD	5
Dreamactivist.org	5
Other organisations mentioned by name	25
Total number of articles	185

*Source:* LexisNexis, ProQuest and Access World News database search of 130 anti-deportation cases, 2009–2012.

immigrant youth in deportation proceedings may be an important tool to raise public awareness about immigration policy issues.

In line with Ellermann's finding that political elites are susceptible to humanitarian claims by deportable migrants in the implementation stage of the process, we found that 23% of articles mentioned the active support of the case by a politician. Most of these articles quoted a public official (most commonly Members of Congress) stating why the individual should not be deported. The following two quotes show the type of language used by political elites to support the anti-deportation campaigns:

'We want them to stay ... to be part of the future of this country', [Senator] Durbin [D-IL] said ... [Durbin praised] the Robles' outstanding academic and athletic careers at Palatine High School and [included] them 'among the brightest, most successful and hardworking young people in our nation'. (*Chicago Daily Herald*, 21 June 2011)

'Already, his example has enriched Michigan and our nation, but I know that his contributions to our country are only beginning', [Senator] Levin [D-MI] said in a statement. (*CNN*, 21 December 2012)

Politicians regularly mention individual characteristics that express acculturation ('brightest, most successful'), civic engagement ('hardworking young people', 'enriched the nation') and deservingness ('we want them to stay'). The articles also regularly mentioned extensive institutional support for individuals in deportation proceedings. Sixty-five per cent of articles mentioned a supporting organisation, with 35% referencing the organisation by name. These organisations included DA and UWD, as well as churches, civic organisations, fraternities and sororities, and national associations of lawyers, for example.

#### *From Policy Implementation to Policy-making?*

As we have shown, the goal of public anti-deportation campaigns is to impact policy implementation. Though case outcome is not often publicly available, we were able to collect information on 35 cases. Of these, 77% of subjects were allowed to stay in the USA, while only 23% were deported. Furthermore, 63% of winning cases received a media hit. These numbers are small and may not be representative of all cases in the sample. Still, they indicate that at the level of policy *implementation*, public anti-deportation campaigns appear to be successful in stopping individual deportations, and that the media may contribute to that success.

Anti-deportation campaigns appear to also contribute to policy *formation*. For example, Illinois Senator Dick Durbin used the case of the Robles brothers in his comments on the Senate floor in favour of the DREAM Act:

'Would America be a better place if Carlos and Rafael are deported? Of course, not', says Sen. Dick Durbin, the Illinois *Democrat*, holding up the poster of the smiling brothers that he uses to champion the DREAM Act he sponsors. These two young men grew up here. They were educated here. They have done well here. They have earned their way here. They want to be part of our future. And they are not isolated examples.

There are literally thousands of them just like Carlos and Rafael across this country.  
(*The Daily Herald*, 1 July 2012)

Though the DREAM Act has not passed as of this writing, high-profile stories of the negative impacts of deportation are regularly cited as reasons to pass pro-immigrant legislation. Furthermore, in the absence of broader legislation for regularisation, politicians have authored private bills to request the cancellation of removal of several anti-deportation campaign subjects.

Anti-deportation campaigns are part of a broad strategy by undocumented youth organisations to ‘come out of the shadow’ and raise support for new policies. These campaigns took place in the years and months leading up to President Obama’s announcement of the DACA programme. Indeed, in his comments announcing the programme, President Obama stated:

I know some [undocumented youth] have come forward, at great risks to themselves and their futures, in hopes it would spur the rest of us to live up to our own most cherished values. And I’ve seen the stories of Americans in schools and churches and communities across the country who stood up for them and rallied behind them, and pushed us to give them a better path and freedom from fear—because we are a better nation than one that expels innocent young kids. (The White House Office of the Press Secretary, 15 June 2012. “Remarks by the President on Immigration.” Accessed January 28, 2014. <http://www.whitehouse.gov/the-press-office/2012/06/15/remarks-president-immigration>.)

President Obama’s remarks indicate that anti-deportation campaigns (including rallying community support) may have contributed to the announcement of DACA. These cases, as part of a larger strategy by undocumented youth organisations, may impact both policy implementation and formation.

### **Conclusions and Implications**

Our analyses demonstrate that the news media do not cover all anti-deportation cases led by undocumented youth organisations equally—students are much more likely to receive coverage than non-students. In addition, news coverage of these campaigns tends to express citizenship in three main ways: citizenship as acculturation and civic engagement, and deservingness of membership vis-à-vis victimhood. These portrayals reflect normative understandings of citizenship that extend beyond legal status or nationality. In addition, the tone of the coverage of these campaigns tends to be positive: pro-immigrant quotes appear over four times more frequently than anti-immigrant quotes. These findings suggest that some immigrant groups—in this case, youth and young adults—who meet the assumptions present in broader understandings of citizenship appear to have garnered public sympathy at the implementation stage of the policy process.

We hesitate, however, to proclaim that this is entirely good news for undocumented immigrants in the USA, even those who meet the criteria for ‘good’

citizenship. To be sure, although the notions of citizenship reflected in these articles seem expansive, they simultaneously suggest that those who do not meet such criteria may still somehow be undeserving of the right to remain or, potentially, to have rights at all. Likewise, as we have shown, the media's portrayal of citizenship often mirror those reflected in ICE guidelines for the prioritisation of certain deportations. When examined in this way, media coverage may serve to reify the notion that the nation state has the right to exclude.

The news coverage we document here may also create a false perception that immigrants have more control over their deportations than they actually do. As Sivaprasad Wadhia (2013) argues, immigration courts are very unlikely to defer action on deportations. And, it is highly unlikely that politicians will actively oppose the deportation of all potential deportees. Still, the anti-deportation cases examined herein have been vastly successful. Of course, we note that each of these cases was carefully selected by DA and UWD, precisely to deploy certain notions of citizenship (Patler 2012). As such, coverage of the type we examine here may also distort the extreme cost of deportation and threats of deportation.

Scholarship on public opinion repeatedly finds that social exposure to immigrants impacts opinion about these groups. In the absence of real exposure, media coverage may be one of the only representations of immigrants available to certain groups of people. In other words, the public may not be exposed to the real consequences of deportation, which could potentially allow legal violence (Menjívar and Abrego 2012) to continue under the guise of having provided relief to some.

Our research suggests that although media coverage prides itself on objectivity, it may instead solidify divisions between groups of people (Erjavec 2003). Indeed, coverage that creates and reinforces the idea that there are 'good' and 'bad' or 'deserving' and 'undeserving' immigrants can drive a wedge between immigrants and non-immigrants, as well as between advocates, lawmakers and pro-immigrant organisations. This has implications for contemporary debates about immigration policy reform in the USA. Social science scholarship would be greatly served by future research that analyses whether the discourse promoted in anti-deportation cases mirrors the discourse surrounding new policies.

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No potential conflict of interest was reported by the authors.

## Notes

- [1] As of June 2014, 675,476 undocumented youth had applied for deferred action and work authorisation under DACA (USCIS, 19 August 2014. "Number of I-821D, Consideration of DACA by Fiscal Year, Quarter, Intake, Biometrics and Case Status: 2012-2014" Accessed September 29, 2014. <http://www.uscis.gov/tools/reports-studies/immigration-forms-data/data-set-deferred-action-childhood-arrivals>)
- [2] At the close of our analysis in 2012, the following states had laws or educational policies allowing eligible undocumented students to pay in-state fees/tuition at public colleges and universities: California (as of 2001), Connecticut (2011), Illinois (2003-2004), Kansas (2003-2004), Maryland (2011-2012), Nebraska (2006), New Mexico (2005), New York (2002), Oklahoma (2003-2004), Rhode Island (2011, via Board of Governors), Texas (2001), Utah (2002), and Washington (2003-2004). States that had barred access to instate tuition or enrollment via laws or policies by the Boards of Governors include: Arizona (2006), Colorado (2008), Georgia (2008, 2010), Indiana (2011), South Carolina (2008), and Alabama (2011). These policies are highly contested. For more information on state actions regarding undocumented students' access to in-state tuition, see: <http://www.ncsl.org/research/education/undocumented-student-tuition-state-action.aspx>
- [3] The DREAM Act (Development, Relief, and Education for Alien Minors) is a legislative proposal first introduced in 2001. Several versions of this bill would provide conditional permanent residency to eligible undocumented young adults who came to the USA as children, graduated from US high schools and are of 'good moral character'. The bill would provide an eventual path to citizenship for undocumented youth who complete time in accredited institutions of higher learning or in the US military.
- [4] The case that received the most news coverage was for Victor Chukwueke, a Nigerian orphan who was brought to the USA by nuns in order to undergo reconstructive surgery for a disease that had caused severe facial malformations. At the time of his campaign, he was a university student and had been admitted to medical school, pending the establishment of legal residency. Michigan Senator Carl Levin introduced several private bills to help keep Victor in the USA, the last of which was signed by President Obama. This was the first private bill regarding an individual's deportation to become law in several years, and it granted Victor permanent residency with a path to citizenship. (See the text of the bill as filed in the Library of Congress. "S.285 – For the relief of Sopuruchi Chukwueke." Accessed January 28, 2014. <http://thomas.loc.gov/cgi-bin/query/D?c112:1:./temp/~c112JowcyS::>)

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