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## Bending rules and breaking hearts: The Postville raid and its constitutional shortcomings

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Bending Rules and Breaking Hearts:  
The Postville Raid and Its Constitutional Shortcomings

RaeAnn Swanson

Civil Liberties in 20<sup>th</sup> Century America

December 13, 2013

Prior to May 2008, Postville, like many other small towns in Iowa, was relatively obscure. The town's claim to fame had been Stephen Bloom's *Postville: A Clash of Culture in the Heartland* published in 2000 and the corresponding PBS documentary "Postville: When Cultures Collide."<sup>1</sup> Both highlighted the growing diversity as Hasidic Jews made Postville their home, a *shtetl* in rural Iowa.<sup>2</sup> The Rubashkin family brought rabbis and their families to Postville in 1987 in order to reopen the defunct Hygrade building as a kosher slaughterhouse and meatpacking plant. As the newly named Agriprocessors grew, managers sought employees who were willing to work long, strenuous hours for little pay. Because of the low wages and questionable working conditions, Iowa natives did not want to work at Agriprocessors, and recent immigrants to the United States and undocumented workers filled the employment gap.

For twenty years, Agriprocessors contributed food to the world's kosher populations and employed workers who desperately needed more money. This kept Postville intact and unharmed from the farm crisis and the diaspora other rural Iowa towns experienced. The largest to date worksite immigration raid on May 12<sup>th</sup>, 2008 at Agriprocessors, forever tied Postville's name with the memory of tragedy and injustice. It also brought to the fore the United States' tenuous immigration policy, exposed the corruption of the pre-packaged Judiciary and Immigration and Customs Enforcement (ICE) process for criminalizing immigrants, and changed the way in which worksite immigration raids are carried out in the United States. Postville's story is one of human struggles, global market demands, post- 9/11 national security concerns, failure of constitutional rights, and community solidarity.

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<sup>1</sup> Stephen Bloom, *Postville: A Clash of Cultures in the Heartland* (New York: Harcourt, 2000), and Nikki Tundel, *Postville: When Cultures Collide* (Alexandria, Va.: PBS Video, 2001).

<sup>2</sup> Mark A. Grey, Michele Devlin, and Aaron Goldsmith, *Postville, U.S.A.: Surviving Diversity in Small-Town America* (Boston: Gemma, 2009), 26. Postville has been described as a *shtetl*, which is a small town with a large Jewish population.

## Postville's Changing Economy and Demographic

Founded by Germans and Norwegians in the mid 1800s, Postville experienced its first wave of growth as the railroad came to town. Construction for St. Paul Lutheran Church began in the 1890s. At St. Paul's community members and immigrants who did not speak English could attend church services in German into the 1940s. The *Iowa Volksblatt*, one of the first newspapers in town, continued to feature articles written in German until 1918 when it became the Postville Herald. Two other churches, Community Presbyterian Church and St. Bridgett's Catholic Church, also served the community.<sup>3</sup> The primarily white, Christian demographic of Postville experienced few changes until the late the 1980s.

According to census data, Postville's population steadily grew until 1980. Various factors, such as the economic downturn that began the 1980s farm crisis and the closing of the Hygrade meatpacking plant, contributed to the decline in population from 1,546 in 1970 to 1,475 in 1980.<sup>4</sup> Hygrade Food Products produced the famous Ball Park Franks that remains the only line of products still in production from the company. Hygrade, along with the turkey processing plant, had been the main employer in town. Many of the workers were part of a union that guaranteed safe working conditions and fair wages. Out of economic necessity Hygrade closed its doors in 1980.<sup>5</sup> The town seemed destined to become another casualty of the farm crisis, a midwestern ghost town with no economic prospects. As chance would have it, in 1987 Aaron

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<sup>3</sup> "City of Postville, Iowa: Hometown to the World," City of Postville, accessed December 1, 2013, <http://www.cityofpostville.com/index.html>.

<sup>4</sup> "Total Population for Iowa's Incorporated Places: 1850-2000," Iowa Data Center, accessed December 1, 2013, <http://data.iowadatacenter.org/datatables/PlacesAll/plpopulation18502000.pdf>.

<sup>5</sup> Erik Camayd-Freixas, *US Immigration Reform and Its Global Impact: Lessons From the Postville Raid* (New York: Palgrave Macmillan, 2013), 18, and Grey, Devlin, and Goldsmith. *Postville, U.S.A.*, 16.

Rubashkin, a butcher and businessman from New York, purchased the Hygrade building and repurposed it into a kosher operation.

Rubashkin's decision to enter into the niche market of kosher foods that serve Jewish believers following the strict dietary rules of *kashrut*, saved Agriprocessors from the harsh economic conditions of the 1980s. Because Agriprocessors had no union affiliation, the low wages for long, grueling hours of work, led to a high turnover rates. Many Iowans did not want the jobs available at the plant and management had to look elsewhere to fill the vacancies. The workers willing to take on meatpacking jobs tended to be those with few other employment prospects. Recent immigrants to the United States and undocumented workers with few options fit the bill. As the town adjusted to the demographic change, many community members were proud of the diversity in their small town. One Postville shirt exhibits a globe with the United States flag at the top. Surrounding the globe flew the flags of every country that was represented in Postville at that time, including Germany, Sweden, and Norway are listed Israel, Poland, Mexico, Albania, Bosnia, Czech Republic, Kazakhstan, Ukraine, Russia, Philippines, Bangladesh, and Guatemala.<sup>6</sup>

Postville soon gained another house of worship, a Synagogue. By 2000, 36 rabbis lived in Postville, more per capita than any other city in America.<sup>7</sup> The population had risen from 1,472 in 1990 to 2,273 in 2000.<sup>8</sup> As Postville began to receive national recognition for its unprecedented diversity in rural Iowa, the town struggled to provide services for the influx of new people. Schools hired interpreters, a soccer league began, KPVL the Postville Radio station

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<sup>6</sup> "Postville Project: Taste of Postville," The Postville Project Digital Collection, accessed December 1, 2013, <http://cdm15897.contentdm.oclc.org/cdm/compoundobject/collection/post/id/474/rec/2>.

<sup>7</sup> Bloom, *Postville*, 22.

<sup>8</sup> "Total Population for Iowa's Incorporated Places: 1850-2000," Iowa Data Center, accessed December 1, 2013, <http://data.iowadatacenter.org/datatables/PlacesAll/plpopulation18502000.pdf>.

featured programs in Hebrew, Spanish, Russian, and English, and the Taste of Postville was created to celebrate the town's diverse inhabitants.<sup>9</sup> The Taste of Postville event became particularly popular, drawing large crowds from surrounding communities, Iowa at large, and eventually from different states. The event began in 1998 with the Gazette stating "Over 1,000 "tasters" enjoyed food from countries around the globe. Many vendors ran out of food early as the crowds were larger than anticipated.... The event surely acquainted guests with our melting pot of...cultures."<sup>10</sup> Businesses in Postville such as Tindel Shoes, the real estate agencies, Moore's IGA (the local grocery store), and many others benefited from the influx of workers at Agriprocessors. Churches began holding special services in Spanish for people from Central America. New grocery stores, one that carried kosher foods and one that catered to Somalian people, opened in town. A Mexican restaurant, Sabor Latinos, and a few clothing stores were also added to Main Street.

Given the swift population and demographic change and the lack of understanding between languages and culture, problems arose. Many Postville residents were unhappy with the seemingly untidy yards of Jewish families. Many people in Postville kept their grass meticulously mowed, children's toys put away, and had gardens or landscape scenes in their front yard. Driving and parking also became an issue between Postville natives and Jewish people. Many people in Postville expected slow and courteous driving, while many Jewish people were used to city driving. Others complained that front yard parking should not be tolerated. Some people voiced concerns that their Jewish neighbors did not seem neighborly enough. Because of the strict dietary rules and rules of modesty for the women, Jewish people

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<sup>9</sup> Grey, Devlin, and Goldsmith. *Postville, U.S.A.*, 45-47.

<sup>10</sup> "Taste is BIG Success," *The Postville Herald-Leader* (August 16, 1998).

tended to act standoffish which some interpreted as rude or snobbish.<sup>11</sup> While the differences and struggles deserve mentioning, many were minor issues that were eventually worked out or ceased to be important as the community adapted to the demographic change.

After 2000, the majority of new workers at Agriprocessors came from Latin America, specifically Guatemala. Guatemala had been plagued with a violent internal conflict for 36 years that had raged from 1946 to 1996. People were tortured, villages were burnt down, and acres of fields were destroyed. Further complicating Latin American conditions were the free trade agreements negotiated with the United States. As cheap, subsidized corn inundated Latin America, local farmers could not compete, thus displacing thousands of workers. Many Guatemalans had grown up working for meager wages, unable to go to school. The possibility of higher paying employment in the United States prompted many to risk the journey.<sup>12</sup> Often, only a husband or young male would travel and send money back to family or relatives. Towns with a strong economic link are called “sister cities.”<sup>13</sup> Sister cities are created when many people from one town or area leave to seek employment in the other town and send money earned there, remittances, back. These towns have a symbiotic relationship in which the success of one town is the success of both.

While Agriprocessors’ workers still came from numerous countries, Postville’s strongest links were between small villages in Guatemala such as San Jose Calderas and El Rosario.<sup>14</sup> Families that stayed in Guatemala often depended on the money they received from Postville for

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<sup>11</sup> Bloom, *Postville*, 48-50.

<sup>12</sup> Camayd-Freixas, *US Immigration Reform and Its Global Impact*, 90-92.

<sup>13</sup> Mark A. Grey and Anne C. Woodrick, “Unofficial Sister Cities: Meatpacking Labor Migration Between Villachuato and Marshalltown, Iowa,” *Human Organization*, 61 (Winter 2002).

<sup>14</sup> Tony Leys, “Hope at Any Cost,” *Des Moines Register*, November 26, 2008.

their survival. Also, people would write home about Postville and others from the same community would be encouraged to come. In order to leave, immigrants generally had to get a loan from a bank if they had credit or a private moneylender. For many, failure to make payments on the loan meant the loss of their home. The risk was often seen as necessary sacrifice in order to get children or family members out of the endemic cycle of poverty in places like Guatemala.<sup>15</sup> Sometimes whole families would migrate to Postville, and often both parents would work at Agriprocessors.

### ICE and the Agriprocessors Raid

After the September 11th, 2001 terrorist attack of the Twin Towers, illegal immigration was perceived by many Americans as a threat to national security. To handle the crackdown on illegal immigration, the Department of Homeland Security implemented a new agency in 2003, Immigration and Customs Enforcement (ICE). Erik Camayd-Freixas, an interpreter at the Agriprocessors worker's trials and a Florida International University professor, noted that ICE drafted a plan titled *Endgame: Detention and Removal Strategy for a Secure Homeland*, with the goal of 100 percent removal of all deportable aliens.<sup>16</sup> ICE described its mission as one to protect and maintain the safety of American society. This mission served to qualify ICE's massive budget allowances and increasing number of raids, criminalizations, and deportations during the Bush-Cheney administration.

Prior to 2001, undocumented workers were typically charged with immigration violations and immediately deported. The Identity Theft Penalty Enhancement Act of 2004 made

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<sup>15</sup> Greg Brosnan and Jennifer Szymaszek, "In the Shadow of the Raid," MCO Film Works, 2009.

<sup>16</sup> Camayd-Freixas, *US Immigration Reform and Its Global Impact*, 159.

knowingly transferring, possessing, or using identification that legally belonged to someone else a federal felony with a mandatory two to ten year prison sentence. In worksite raids, ICE began charging undocumented workers in possession of social security numbers belonging to other people with identity theft. In 2007, ICE arrested 863 immigrants on criminal charges. From the May 12th, 2008 raid on Agriprocessors ICE made nearly 300 arrests in one month.<sup>17</sup>

The government had been watching Agriprocessors for several years. In 2004, for example, the United States Department of Agriculture, USDA, and the Environment Protection Agency, EPA, looked into allegations of animal cruelty and pollutants that exceeded legal limits at Agriprocessors.<sup>18</sup> Iowa Occupational Safety and Health Administration (IOSHA) cited six violations against Agriprocessors in 2006 and 39 violations in 2008.<sup>19</sup> The Social Security Association sent Agriprocessors hundreds of ‘no-match’ letters detailing the number of workers using social security numbers not legally issued to them. As many as 737 Agriprocessors workers were using social security numbers not legally issued to them, 590 of the numbers belong to actual people, but only one number was reported as stolen.<sup>20</sup> ICE used the numbers to petition for criminal arrest warrants, eventually receiving 697 warrants for Agriprocessors workers.

At the time of the raid, the Iowa Department of Labor was conducting an inquiry into child labor at the plant. When word of a possible raid reached other government agencies the United Food and Commercial Workers Union’s Vice President purportedly wrote a letter to ICE

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<sup>17</sup> Peter R. Moyers, “Butchering Statues: The Postville Raid and the Misinterpretation of Federal Criminal Law,” *Seattle University Law Review* 32 (2009): 654.

<sup>18</sup> Moyers, “Butchering Statues,” 655.

<sup>19</sup> “Agriprocessors Report,” United Food and Commercial Workers Union, accessed December 7, 2013, 9-10, [http://www.lexisnexis.com/Community/immigration-law/cfs-filesystemfile.ashx/\\_key/CommunityServer.Components.SiteFiles/ImmigrationLawPDFs/AgriDoc1.pdf](http://www.lexisnexis.com/Community/immigration-law/cfs-filesystemfile.ashx/_key/CommunityServer.Components.SiteFiles/ImmigrationLawPDFs/AgriDoc1.pdf).

<sup>20</sup> Moyers, “Butchering Statues,” 659-660.

stating, “any potential ICE action could not only have a chilling affect over the existing workforce...ICE action could also result in employees leaving the plant...thereby interfering with the Department of Labor's investigation that could ultimately uncover unscrupulous employer acts.”<sup>21</sup> Had the Department of Labor investigation continued, the 96 fake identification cards found in the Agriprocessors Human Resources office would have been made known to the public. Although the fake identification cards were found shortly after the May 12th raid, the information was withheld until two months after sentencing the workers. The raid and subsequent trials would have taken a different tone had the information came out earlier.<sup>22</sup>

In Waterloo, government personnel transformed the National Cattle Congress, the area used to show and house animals at county and local fairs, into a housing area. Workers at the site were tight-lipped about what the facility would be used for. Some people guessed a drill in case of an natural disaster, others remembered the 2006 Swift&Co. raid on Marshalltown and thought about the nearby communities known to have undocumented workers. On the morning of May 12, 2008, Postville residents rose as on any other day. Many began their long day of work at Agriprocessors. At 10:00 that morning, Pedro Arturo Lopez Vega, an 8<sup>th</sup> grade student, peered at the helicopters circling over Postville with his classmates. He crumpled at his desk when he realized immigration enforcement might be in town. Everyone, including Pedro, knew where the helicopters, police cars, and detention buses were headed. His mother had gone to work that morning at Agriprocessors.<sup>23</sup>

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<sup>21</sup> “Agriprocessors Report,” United Food and Commercial Workers Union, accessed December 7, 2013, 11, [http://www.lexisnexis.com/Community/immigration-law/cfs-filesystemfile.ashx/\\_key/CommunityServer.Components.SiteFiles/ImmigrationLawPDFs/AgriDoc1.pdf](http://www.lexisnexis.com/Community/immigration-law/cfs-filesystemfile.ashx/_key/CommunityServer.Components.SiteFiles/ImmigrationLawPDFs/AgriDoc1.pdf).

<sup>22</sup> Camayd-Freixas, *US Immigration Reform and Its Global Impact*, 83.

<sup>23</sup> Luis Argueta and Vivian Rivas, “AbUSed: the Postville Raid,” Maya Media, 2010.

The scene at Agriprocessors was filled with unimaginable chaos and fear. Women and men were shouting “La Migra! La Migra!” People hid and ran wherever they could. One man was so scared he began to run forgetting the long, sharp knives in his hands. An ICE agent pushed him, causing severe injuries to his leg, but the agent continued to shackle him without seeking medical help.<sup>24</sup> Some women workers cried for their children and others thought of the family members they had been supporting in Mexico, Guatemala, or the Ukraine. Agents taunted the workers, saying things like ‘go back to your country,’ and ‘who wants shackles?’<sup>25</sup> ICE agents rounded up the workers, shackled them on the ankles, waists, and wrists, and took them outside to board the buses that transported them to Waterloo.

#### National Cattle Congress and Unconstitutional Trials

When the buses arrived at the National Cattle Congress later in the day on May 12, the 389 workers were taken to the McElroy Auditorium where computers and finger print scanners were set up to process them through the makeshift judicial and prison system that the government had manufactured. In order to keep anyone from getting in or out of the National Cattle Congress, ICE agents, FBI, and US marshals patrolled the grounds night and day. They set up trailers and buses around the buildings, allowing them to keep a close watch on the detainees and the gates. The agents did not want anyone to come in or to get out. Judges and clerks used doublewide trailers on the premises for their temporary offices during the proceedings. The Pepsi Pavillion was converted into the ICE command center, and the Electric Park Ballroom became

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<sup>24</sup> Erik Camayd-Freixas, Affidavits of Two Guatemalan Prisoners From the Postville Raid, Testimony of Mardoqueo Valle Callejas, November 15, 2008.

<sup>25</sup> Erik Camayd-Freixas, Affidavits of Two Guatemalan Prisoners From the Postville Raid, Testimony of Marvin Danilo Perez-Gomez, November 15, 2008.

the courtroom. Chain link cages surrounded the holding center set up in Estel Hall for the detainees, but the workers remained shackled at the wrists and ankles. Some workers were deprived of their shoes and sweatshirts upon entering the unheated, concrete building.<sup>26</sup> A video released by ICE to pacify the public's discontent over the secretive procedure occurring at the National Cattle Congress showed games, televisions, and phones that the workers supposedly had access to.<sup>27</sup> Only after the trials did the public learn that those amenities were for the guards.

The process at the National Cattle Congress needed to be quick because the detention center had never received official sanction from the Department of Justice and the Board of Prisons as a detention center. Thus, two days were afforded for the arraignment before the workers were sent to jails and prisons throughout Iowa to await their charges. Before the raid, ICE, the U.S. Attorney's Office, and the Northern Iowa District Court collaboratively prepared a binder for defense attorneys that contained charges, plea bargains, forms for waiving the right to grand jury indictment, and scripts on how to inform their clients and lead them through the process.<sup>28</sup> The defense attorneys contacted were asked to take two weeks off their schedule, but were not informed of specifics until they arrived on site. Rockne Cole, a defense attorney, declined to work on the case because he believed the collaboration and pre-packaged trials were unethical.<sup>29</sup>

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<sup>26</sup> Camayd-Freixas, *US Immigration Reform and Its Global Impact*, 50-51.

<sup>27</sup> "Cattle Congress Detention Facility for Postville Raid," Gazetteonline, video, accessed December 7, 2013, <http://www.youtube.com/watch?v=qAm-H8B5l4g>.

<sup>28</sup> Amalia Greenberg and Shanti Marin, "How Ice Threatens the Ethical Responsibilities of Key Players in Worksite Raids: Postville Study," *Human Rights Brief*, 16 (2008), 16-17, and American Civil Liberties Union, "Government "Manuel" Distributed to Iowa Defense Lawyers," July 31, 2008, <https://www.aclu.org/immigrants-rights/government-manual-distributed-iowa-defense-lawyers>.

<sup>29</sup> Rockne Cole to Zoe Lofgren, July 24, 2008, <http://graphics8.nytimes.com/packages/pdf/national/ColeLetter.pdf>.

The detained workers spent the night of May 12<sup>th</sup> in Estel Hall, but ICE agents would not allow them to sleep. Agents also made the workers eat the meager portions of food and water while in shackles. After keeping the workers awake for nearly 20 hours, and without a lawyer present, Agents presented the workers with an option: sign the form waiving their right to a grand jury indictment or do more time in jail. When one man asked to see a lawyer, agents threatened him saying, “If you don’t sign, you’re going to be forgotten in this country.”<sup>30</sup> The next morning arraignment began. Defense attorneys, who had an average of 17 clients apiece, had little or no time to meet with their clients beforehand. Some attorneys met their clients in makeshift rooms but with language barriers and few interpreters, as well as ICE agents listening, the meetings did little to help the clients. The workers, still shackled, were filed through the charging in groups of ten.<sup>31</sup> The workers were then bused to county jails throughout Northern Iowa to await their next orders.

Defense attorneys were finally able to meet with their clients in the county jails. The meetings consisted of trying to explain the charges and giving the workers their options. The court had charged them with aggravated identity theft, but offered the workers an ‘exploding’ (not available after seven days) plea agreement for a lesser charge. The workers had a choice between pleading guilty of knowingly using a false social security number, serve five months in prison, and be deported, or they could plead not guilty, take their chances in court, and possibly serve two to ten years in jail if they were convicted of aggravated identity theft. In other words

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<sup>30</sup> Erik Camayd-Freixas, Affidavits of Two Guatemalan Prisoners From the Postville Raid, Testimony of Mardoqueo Valle Callejas, November 15, 2008. By forgotten in this country the agent meant forgotten or lost in the United State’s prison system.

<sup>31</sup> Camayd-Freixas, *US Immigration Reform and Its Global Impact*, 53-54.

the workers, many of whom had family members depending on them for survival, had no real choice.

Pointing at the nine-digit number on an employee's record, a defense attorney asked his client, "Do you know what this number is?" The client replied no.<sup>32</sup> As attorneys met with their clients, they found that many could not read or write English or Spanish, their native tongue being a dialect of the 24 recognized Mayan languages.<sup>33</sup> Because of the widespread illiteracy, many of the workers said the human resources manager helped them fill out their employment papers. When attorneys asked their clients directly if they knew what social security numbers were, many said no. The inconsistency between the court's charges and the worker's lack of knowledge led many attorneys and interpreters to draw the conclusion that the workers were innocent of the charges against them.<sup>34</sup> However, none of the workers wanted to spend time on a trial and the possibility of a two to ten year jail sentence deterred many from pleading not guilty. Of the 389 people arrested at the Postville Raid, 56 people, mostly women, were sent back to Postville with ankle tracking devices, 27 people received probation deportation because the social security number they had used did not match an actual person, and 270 people received five months in prison or more.<sup>35</sup>

Erik Camayd-Freixas worked as an interpreter throughout the trials and was present at many of the attorney client meetings. He became outraged by the unconstitutional legal

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<sup>32</sup> Camayd-Freixas, *US Immigration Reform and Its Global Impact*, 62.

<sup>33</sup> "Mayan Languages: Our Diverse Culture," The Guatemalan-Maya Center, accessed December 8, 2013, <http://www.guatemalanmaya.org/index.php?q=featured/mayan-languages-our-diverse-culture>.

<sup>34</sup> Camayd-Freixas, *US Immigration Reform and Its Global Impact*, 62.

<sup>35</sup> Erik Camayd-Freixas, "Immigrant Rights and American Values: Seeing With New Eyes, Postville: An Interpreter's Experience," Lecture, Cedar Falls, Iowa, March 9, 2010, <http://www.arch.pvt.k12.ia.us/HispanicMinistry/pdf/immigrationflyer.pdf>.

proceedings brought on by the large-scale Postville raid, and was the first person who publically spoke out about the injustices in a New York Times article.<sup>36</sup> He later traveled across Iowa presenting a lecture title “Immigrant Rights and American Values: Seeing With New Eyes, Postville: An Interpreter’s Experience.” In the lecture Camayd-Freixas noted that the courts had trammled the fourth, fifth, sixth, and eighth amendment rights of the undocumented workers.

Among the rights guaranteed by the Fourth Amendment are the right to be secure against unreasonable searches and seizures, including personal papers, and that warrants can be issued only upon probable cause. Camayd-Freixas argued that ICE did not have adequate probable cause to obtain over 700 warrants, when only one of the social security number was reported stolen. The Fifth Amendment states that people have a right to a Grand Jury indictment, are entitled to due process of the law, and private property will not be taken without compensation. The workers were presumed guilty, deprived of sleep and food for nearly 20 hours, and coerced by agents who told them to think of their starving families to sign a form waiving their right to a Grand Jury Indictment without counsel.

Workers were denied a speedy trial and the assistance of counsel, which constituted a blatant disregard of their Sixth Amendment rights. Workers signed the waivers and plea agreements with the understanding that had they not cooperated, ICE agents would make them stay in jail much longer than the five months for pleading guilty. Under fear that ICE agents would carry through with their threats and with concern for the welfare of their families, the workers rushed through the process without complete understanding. This partial understanding was further complicated by the fact that the workers were not allowed to see immigration lawyers. Their criminal defense lawyers were unaware of the serious immigration consequences

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<sup>36</sup> Erik Camayd-Freixas, “Interpreting after the Largest ICE Raid in US History: A Personal Account,” *The New York Times* (July 14, 2008) <http://graphics8.nytimes.com/images/2008/07/14/opinion/14ed-camayd.pdf>.

to pleading guilty to a criminal charge. Some of the workers who may have qualified for refugee or asylum status in the United States would never be allowed back with a criminal record.

Communication and time issues abounded and were further compounded by the court rushing attorney-client meetings in order to beat habeas corpus regulations. Last, the Eighth Amendment states that excessive bail will not be imposed nor cruel and unusual punishment. ICE agents used the fact that the workers were being held on an immigration detainer to threaten them with more time in jail. With an immigration detainer, people can be held indefinitely without bail, just for suspicion of an immigration violation. The aforementioned use of the workers' concern for their family as coercion could be seen as cruel and unusual punishment.<sup>37</sup>

### Aftermath in Postville

As soon as people in Postville realized that ICE had come to raid Agriprocessors, a panic broke out. Many people, terrified that ICE would carry out its infamous house raids, raced to the churches in town. That afternoon, Postville's school began coordinating with church leaders to make lists of students at the school and adults seeking refuge at the churches in order to transport children not picked up at the school to their parents. By seven o'clock that night, St. Bridget's church was housing 400 adults and children too afraid to go home.<sup>38</sup> A similar situation occurred at the Presbyterian Church. Townspeople brought blankets and food to be cooked in the churches' kitchens.

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<sup>37</sup> Eric Camayd-Freixas, "Immigrant Rights and American Values: Seeing With New Eyes, Postville: An Interpreter's Experience," Lecture, Cedar Falls, Iowa, March 9, 2010, <http://www.arch.pvt.k12.ia.us/HispanicMinistry/pdf/immigrationflyer.pdf>, for interpretations of constitutional shortcomings and "Bill of Rights," Legal Information Institute, accessed December 8, 2013, <http://www.law.cornell.edu/constitution/billofrights>, for amendment rights.

<sup>38</sup> Sister Mary McCauley, "The Postville, Iowa Immigration Raid, May 12, 2008," Archdiocese of Dubuque, accessed December 11, 2013, <http://www.arch.pvt.k12.ia.us/postvillierelief/pdf/dayofraid.pdf>.

At the Presbyterian Church, for three days and nights, people slept in the fellowship hall and were fed by their generous neighbors. At night, the doors were locked and church leaders stayed in the entry hall. By the third night after the raid, many people had gone back to their homes. Unfortunately, an Iowa, Chicago, and Eastern (IC&E) Railroad car pulled into town and mistakenly word got out that 'ICE' had come back. Terrified that ICE really was back, people ran toward the churches. They were crying, some with children in tow, banging on the doors to be let in.<sup>39</sup>

Shortly after the raid, 56 people (mostly women) were sent back to Postville to care for their children, many of who were United States citizens. The women were sent back to Postville with global positioning system ankle tracking devices. The hard-working women, many of whom had endured long hours and often physical abuse at Agriprocessors to make ends meet for their families, had to rely on charity of the churches and the food bank to house and feed their families. Many women had young children who needed constant care, however, during the two hours their tracking devices needed to be plugged into the wall to charge they were unable to move or adequately tend to their children. The recommended time to wear ankle-tracking devices is 30 days, but the Postville women had to wear them for over a year and a half.<sup>40</sup>

The raid traumatized many of the children who experienced it. Families and teachers reported behavior changes such as depression, anxiety, bullying, and changes in grades. Some children would wake in the night terrified that ICE was taking them or their family members, and others reported incidents of bed-wetting in children who never had the problem prior to the

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<sup>39</sup> Harold and Dona Peck, Interviewed by RaeAnn Swanson, Postville, IA, November 29, 2013. Interview on hand with the author.

<sup>40</sup> Luis Argueta and Vivian Rivas, "AbUSed: the Postville Raid," Maya Media, 2010.

raid.<sup>41</sup> Many families were literally divided when husbands, wives, mothers, fathers, sons, or daughters were deported after the raid. In a few cases, mothers were too afraid to tell ICE that they had children in Postville and were deported. Pedro Arturo Lopez Vega and his sister Samantha's mother was deported, and they could only communicate with her through letters. Other families had to take their children to Mexico or Guatemala. One mother described how Calderas, Guatemala became inundated with unemployed workers after the raid and there were no jobs. She stood in her house with her daughter, an American citizen. She said, "Some days we have food, some days we don't. I see that she has stopped growing... I'd like to return to the U.S. ... I want her to grow up in her country."<sup>42</sup>

For nearly all Iowans, 2008 represented a year of tragedies and trials. The Postville raid, the tornado in Parkersburg, and the statewide flooding all caused physical harm and damage to people and their property, to businesses and community institutions, and had negative psychological effects on the people that experienced them. While insurance and government funding helped tornado and flood victims, agencies like FEMA were silent and unsympathetic when it came to the precarious situation in Postville.<sup>43</sup> Postville, in one afternoon, lost nearly one fifth of its population. Many families left Postville because they feared that ICE would return to Agriprocessors. Businesses closed their doors, properties sat empty, property owners went bankrupt because most of their tenants left, and taxes did not cover the cost of services for the

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<sup>41</sup> Eric Camayd-Freixas, "Immigrant Rights and American Values: Seeing With New Eyes, Postville: An Interpreter's Experience," Lecture, Cedar Falls, Iowa, March 9, 2010, <http://www.arch.pvt.k12.ia.us/HispanicMinistry/pdf/immigrationflyer.pdf>.

<sup>42</sup> Luis Argueta and Vivian Rivas, "AbUSed: the Postville Raid," Maya Media, 2010.

<sup>43</sup> Ron Scherer, "Parkersburg, Iowa, Emerges as Model for Tornado Recover," *Christian Science Monitor* (June 7, 2011), the tornado resulted in nearly seven million dollar cleanup of which FEMA paid nearly six million. Betsy Rubiner, "A Year After the Flood, Cedar Rapids Struggles," *TIME* (June 17, 2009), the 2008 flooding caused nearly ten billion dollars of damage and Iowa was granted nearly 789 million dollars in federal money.

town. Further, Agriprocessors took a hit in productivity that affected a wide range of economic relationships. Many people lost business because of the Postville raid including farmers who supplied chicken and cattle, famers who supplied feed for the animals, truck drivers who transported the products, and merchants who sold the products in their stores. An estimated seven American jobs were lost for every one migrant worker that was deported.<sup>44</sup>

Erik Camayd-Freixas estimated that the Postville raid cost taxpayers nearly 10 million dollars in carrying out the raid and removal and the five-month detention. Iowa lost nearly 300 million dollars per year in regional business, and Postville's sister cities lost nearly seven million dollars in remittances.<sup>45</sup> The Postville community and nongovernmental organizations were burdened with paying for food, medical bills, and rent. St. Bridget's Catholic Church was spending nearly 80,000 dollars a month to support its members left unable to work after the raid.<sup>46</sup> When the Postville city council declared an economic and humanitarian disaster in November of 2008, FEMA and state agencies offered no help.<sup>47</sup>

#### The Fate of Agriprocessors and Sholom Rubaskin:

Agriprocessors could not bounce back after the raid because few people wanted to take the positions that the arrested workers had filled. Managers tried hiring legal workers from employment agencies across the United States. Many of the people willing to come to Iowa to work in a slaughterhouse were homeless or ex-convicts with few employment options. Increased

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<sup>44</sup> Camayd-Freixas, *US Immigration Reform and Its Global Impact*, 143.

<sup>45</sup> Erik Camayd-Freixas, "Raids, Rights, Reform: The Postville Case and the Immigration Crisis" *DePaul Journal for Social Justice*, 2 (Fall 2008) 3.

<sup>46</sup> Wayne Drash, "Priest: 'Nobody Can Tell Me to Shut Up,'" *CNN.com* (October 15, 2008).

<sup>47</sup> Cornelia Butler Flora and Jan L. Flora, "Postville, Iowa: Lessons for Immigration Reform," accessed December 11, 2013, <http://migrationfiles.ucdavis.edu/uploads/cf/files/2009-may/flora.pdf>, 8.

crime in Postville shortly followed in the wake of their arrival. Later refugee populations would come and go, as transient slaughterhouse workers are known to do.<sup>48</sup> In November of 2008 Agriprocessors declared bankruptcy. A Canadian company, SFH Industries, bought Agriprocessors at auction for 8.5 million dollars. The selling cost was nearly 16 million dollars short of what Agriprocessors owed its employees and creditors. The plant was renamed AgriStar and never regained pre-raid production levels.<sup>49</sup>

In November 2008 Sholom Rubashkin was arrested on charges that included harboring illegal immigrants and aiding and abetting aggravated identity theft and document fraud. He also faced nearly 9,000 counts of child labor violations for employing at least 32 people under the age of 18.<sup>50</sup> In 2009 the immigration charges against Rubashkin were dropped, and at the 2010 trial for the child labor violation, the court found him not guilty of knowingly or deliberately employing minors.<sup>51</sup> In June of 2010, Linda Reade, whose limited participation in the Postville raid called her impartiality into question, sentenced Rubashkin to 27 years in prison and 27 million dollars in restitution to the First Bank Business Capitol in St. Louis, for his 86 counts of financial fraud.<sup>52</sup>

Based on new evidence gleaned from a Freedom of Information Act (FOIA) document that stated that Judge Reade had known about the Postville raid six months before it occurred, Rubashkin's lawyer filed a motion for a new trial. In October 2010, Judge Reade, denied the

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<sup>48</sup> Grey, Devlin, and Goldsmith. *Postville, U.S.A.*, 75-79.

<sup>49</sup> Rebecca Dube, "New Owner of Agriprocessors Faces Old Questions About Its Plan for the Company," *The Jewish Daily Forward* (July 22, 2009).

<sup>50</sup> Wayne Dash, "Former Manager of Largest U.S. Kosher Plant Arrested," *CNN.com* (October 30, 2009).

<sup>51</sup> Luis Argueta and Vivian Rivas, "AbUSed: the Postville Raid," Maya Media, 2010.

<sup>52</sup> Julie Preston, "27-Year Sentence for Plant Manager," *New York Times* (June 21, 2010).

motion for a new trial.<sup>53</sup> In 2012, Rubashkin's attorneys petitioned the Supreme Court to hear his case, but it was later denied. The 27-year sentence Rubashkin received for a nonviolent crime with no prior convictions, created substantial backlash. Professors and legal experts have called for a change in charges since there is no legal precedence for such a strict ruling and because for 54 year-old Rubashkin, the now 25 years could be a life sentence.<sup>54</sup>

### Legislation and Raids After Postville:

Two key pieces of legislation were passed after the Postville raid. If either *Flores-Figueroa v. United States* or *Kentucky v. Padilla* had occurred before May 12<sup>th</sup>, 2008, the trials would have had a much different outcome. *Flores-Figueroa* was a Mexican citizen who came to the United States to work. It was later discovered that the social security number he gave his employer was not his and he was charged with aggravated identity theft. The defendant challenged the previously accepted idea that the word 'knowingly' in the charges (knowingly transfers, possesses, or uses, without lawful authority, a means of identification of another person) only applied to not only knowingly transferring, possessing, or using an unlawful identification but also to knowing that it belonged to another person. Decided in May 2009 in a unanimous vote, the Supreme Court ruled that the word knowingly applied throughout the whole sentence, meaning unknowing immigrants could not be charge with aggravated identity theft.<sup>55</sup> Had *Flores-Figueroa* occurred a year earlier, prosecutors would have lost their leverage against

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<sup>53</sup> "Motion for a New Trial," Justice for Sholom, accessed December 11, 2013, <http://justiceforsholom.org/the-story/motion-for-new-trial>.

<sup>54</sup> Julie Preston, "Life Sentence Is Debated For Meat Plant Ex-Chief," *The New York Times* (April 28, 2010).

<sup>55</sup> *Flores-Figueroa v. United States*, 08-108 (U.S. Supreme Court, 2009), accessed December 11, 2013, <http://www.supremecourt.gov/opinions/08pdf/08-108.pdf>.

the undocumented workers in the Postville case, they would not have been charged as criminals, and they would have been promptly deported.

In *Padilla v. Kentucky*, Jose Padilla, a legal immigrant to the United States was caught transporting marijuana, was told by his defense attorney that it would not affect his status in the United States if he plead guilty. After pleading guilty he was sentenced to deportation, which his counsel had failed to make clear. He challenged the ruling, citing that his Sixth Amendment right to assistance of counsel had been violated. The Supreme Court ruled in March 2010 with a seven to two vote that Padilla's defense had been deficient. *Padilla v. Kentucky* made it necessary for all immigrants to be counseled by immigration lawyers or defense attorneys well versed in immigration law. Now, in order for the Sixth Amendment rights to be met, they had to be informed of the immigration consequences.<sup>56</sup> Because the Postville workers were charged with a federal felony, many who plead guilty will never be lawfully admitted to the United States. Had the Postville workers been allowed to speak with immigration lawyers they might not have plead guilty so quickly.

Just months after the Postville raid, ICE conducted an even larger worksite raid at Howard Industries in Laurel, Mississippi. On this August 25<sup>th</sup>, 2008 raid 595 workers were arrested. Many faced immigration charges, but only eight received criminal charges. The overall negative public opinion surrounding the Postville raid made judges and law officials wary of cooperating on the same scale that the District Court of Northern Iowa had. After these two large worksite raids that targeted immigrants, many people spoke out against criminalization of immigrants and called for immigration reform in the United States. While some worksite raids still occurred When President Obama took office in 2009, they were never as large as Laurel,

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<sup>56</sup> *Padilla v. Kentucky*, 08-651 (U.S. Supreme Court, 2010), accessed December 11, 2013, <http://www.supremecourt.gov/opinions/09pdf/08-651.pdf>.

Mississippi or the Postville raid. Many undocumented workers were screened out of employment positions by E-Verify, a new social security screening technology. These “paper-raids” still displace workers, threaten families, and challenge the economic viability of communities that rely on migrant labor.<sup>57</sup>

### Conclusion

Currently, Postville shows signs of a healing community, but the raid remains a central part of the town’s identity. The injustices carried out at Agriprocessors and at the subsequent trials also became part of the national dialogue of immigration policy in the United States. Many of the children affected by the raid have since grown up and some of them have graduated high school, fulfilling their parents’ dream of obtaining an education for their children. Some families that were torn apart by the Postville raid have been reunited by the work of pro-bono immigration lawyers like Sonia Parras Konrad who are working to file for U-Visas for as many Postville victims that are applicable. U-Visas are allotted to workers who experienced any physical, sexual, or emotional abuse at Agriprocessors. As of May 2013, 40 people had received U-Visas. The Visas allow four years of temporary legal immigrant status in the United States, but after three years, they would be eligible to apply for a green card.<sup>58</sup> Luis Argueta the producer of AbUSed, is currently working on a new documentary titled *The U-Turn: A Transformational Story*. The U-Turn follows those Postville victims who received U-Visas and the community that stood behind them and others who remained in Postville. A trailer has been released but the documentary will be coming soon.<sup>59</sup>

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<sup>57</sup> Camayd-Freixas, *US Immigration Reform and Its Global Impact*, 166-168.

<sup>58</sup> “After Postville Raid, Advocates Hope Next Step Is Immigration Reform,” *The Gazette* (May 5, 2013).

<sup>59</sup> “The U- Turn: A Transformational Story,” Maya Media Corp, accessed December 9, 2013, <http://www.theurnfilm.com/welcome.html>.

Whether the raid was carried out as a lesson for undocumented workers or their employers or as a large scale, collaborative experiment between law enforcement and judicial enforcement, the public may never know. That community solidarity and human compassion is alive and well in Postville is something that everyone can be certain about. While some people would condemn immigrants and undocumented workers for coming to the United States, others embrace diversity and would like to see the United States become a more open and understanding nation. The tragedy experienced by the workers and their families before, during and after the raid in 2008 served to educate many people on the issues of migration and deportation, workplace abuses of undocumented workers, and the unconstitutional practices implemented in large-scale raids. The story of the Postville has inspired a call for immigration reform in the United States from people in all walks of life and from areas across the globe.

## Bibliography

- “After Postville Raid, Advocates Hope Next Step Is Immigration Reform.” *The Gazette*. May 5, 2013.
- “Agriprocessors Report.” United Food and Commercial Workers Union. Accessed December 7, 2013. [http://www.lexisnexis.com/Community/immigration-law/cfs-filessystemfile.ashx/\\_\\_\\_key/CommunityServer.Components.SiteFiles/ImmigrationLawPDFs/AgriDoc1.pdf](http://www.lexisnexis.com/Community/immigration-law/cfs-filessystemfile.ashx/___key/CommunityServer.Components.SiteFiles/ImmigrationLawPDFs/AgriDoc1.pdf).
- American Civil Liberties Union. “Immigration Raids: Postville and Beyond.” Submitted to the U.S. House of Representatives Committee on the Judiciary, Subcommittee on Immigration, Citizenship, Refugees, Border Security, and International Law. July 24, 2008.
- American Civil Liberties Union. “ACLU Demands Government Restore Basic Legal Protections To Meatpacking Workers Arrested In Iowa Raids.” May 21, 2008. <https://www.aclu.org/immigrants-rights/aclu-demands-government-restore-basic-legal-protections-meatpacking-workers-arrest>.
- American Civil Liberties Union. “Faces of Justice Denied - Immigrant Workers in Iowa.” December 10, 2010. <https://www.aclu.org/human-rights-immigrants-rights/faces-justice-denied-immigrant-workers-iowa>.
- American Civil Liberties Union. “Government “Manuel” Distributed to Iowa Defense Lawyers.” July 31, 2008. <https://www.aclu.org/immigrants-rights/government-manual-distributed-iowa-defense-lawyers>.
- Argueta, Luis and Vivian Rivas, “AbUSed: the Postville Raid,” Maya Media. 2010.
- “Bill of Rights.” Legal Information Institute. Accessed December 8, 2013. <http://www.law.cornell.edu/constitution/billofrights>.
- Bloom, Stephen. *Postville: A Clash of Cultures in Heartland America*. New York: Harcourt, 2000.
- Brosna, Greg and Jennifer Szymaszek. “In the Shadow of the Raid.” MCO Film Works. 2009.
- “City of Postville, Iowa: Hometown to the World.” City of Postville. Accessed December 1, 2013. <http://www.cityofpostville.com/index.html>.
- Camayd-Freixas, Erik. Affidavits of Two Guatemalan Prisoners From the Postville Raid. Testimony of Marvin Danilo Perez-Gomez. November 15, 2008.
- Camayd-Freixas, Erik. Affidavits of Two Guatemalan Prisoners From the Postville Raid. Testimony of Mardoqueo Valle Callejas. November 15, 2008.

- Camayd-Freixas, Erik. "A Matter of Interpretation." *Progressive*, 72. November 2008. 18-26.
- Camayd-Freixas, Erik. Brief to the Senate Judiciary Committee Regarding the Nomination of Asua Stephanie Rose for US Attorney for the Northern District of Iowa and the Inquiry into the Postville Prosecutions of May 12-23, 2008. November 4, 2009.
- Camayd-Freixas, Erik. "Immigrant Rights and American Values: Seeing With New Eyes, Postville: An Interpreter's Experience." Lecture, Cedar Falls, Iowa, March 9, 2010. <http://www.arch.pvt.k12.ia.us/HispanicMinistry/pdf/immigrationflyer.pdf>.
- Camayd-Freixas, Erik. "Interpreting after the Largest ICE Raid in US History: A Personal Account." *The New York Times*. July 14, 2008. <http://graphics8.nytimes.com/images/2008/07/14/opinion/14ed-camayd.pdf>.
- Camayd-Freixas, Erik. "Raids, Rights, Reform: The Postville Case and the Immigration Crisis." *DePaul Journal for Social Justice*, 2. Fall 2008. 1-24.
- Camayd-Freixas, Erik. *US Immigration Reform and Its Global Impact: Lessons From the Postville Raid*. New York: Palgrave Macmillan, 2013.
- Camayd-Freixas, Erik. "What Court Ruling on Identity Theft Means to Migrants." *La Prensa San Diego*, 33. June 12, 2009.
- "Cattle Congress Detention Facility for Postville Raid." Gazetteonline, video. Accessed December 7, 2013. <http://www.youtube.com/watch?v=qAm-H8B5l4g>.
- Cole, Rockne to Zoe Lofgren, July 24, 2008, <http://graphics8.nytimes.com/packages/pdf/national/ColeLetter.pdf>.
- Dash, Wayne. "Former Manager of Largest U.S. Kosher Plant Arrested." *CNN.com*. October 30, 2009.
- Dash, Wayne. "Priest: 'Nobody Can Tell Me to Shut Up.'" *CNN.com*. October 15, 2008.
- Dube, Rebecca. "New Owner of Agriprocessors Faces Old Questions About Its Plan for the Company." *The Jewish Daily Forward*. July 22, 2009.
- Flora, Cornelia Butler and Jan L. Flora. "Postville, Iowa: Lessons for Immigration Reform." Accessed December 11, 2013. <http://migrationfiles.ucdavis.edu/uploads/cf/files/2009-may/flora.pdf>.
- Flores-Figueroa v. United States. 08-108. U.S. Supreme Court, 2009. Accessed December 11, 2013. <http://www.supremecourt.gov/opinions/08pdf/08-108.pdf>.

- Greenberg, Amalia and Shanti Marin. "How Ice Threatens the Ethical Responsibilities of Key Players in Worksite Raids: Postville Study." *Human Rights Brief*, 16. 2008.
- Grey, Mark A., Michele Devlin, and Aaron Goldsmith. *Postville, U.S.A.: Surviving Diversity in Small-Town America*. Boston: Gemma, 2009.
- Grey, Mark A. and Anne C. Woodrick. "Unofficial Sister Cities: Meatpacking Labor Migration Between Villachuato and Marshalltown, Iowa." *Human Organization*, 61. Winter 2002. 364-375.
- Grey, Mark A. and Anne C. Woodrick. "Welcoming New Iowans: A Guide for Christians and Churches." The University of Northern Iowa New Program Ecumenical Ministries of Iowa. Accessed December 11, 2013. <http://www.bcs.uni.edu/icili/pdfs/Welcoming%20New%20Iowans-2nd%20Edition.pdf>.
- Grey, Mark A. "Welcoming New Iowans: A Guide for Citizens and Communities, Building Respect and Tolerance for Immigrant and Refugee Newcomers." University of Northern Iowa-Iowa Center for Immigrant Leadership and Integration. Accessed December 11, 2013. <http://www.bcs.uni.edu/icili/handbooks>.
- Koh, Jennifer Lee. "Waiving Due Process (Goodbye): Stipulated Orders of Removal and the Crisis in Immigration Adjudication." *North Carolina Law Review*, 91. January 2013. 475-548.
- Leys, Tony. "Hope at Any Cost." *Des Moines Register*. November 26, 2008.
- "Mayan Languages: Our Diverse Culture." The Guatemalan-Maya Center. Accessed December 8, 2013, <http://www.guatemalanmaya.org/index.php?q=featured/mayan-languages-our-diverse-culture>.
- McCauley, Sister Mary. "The Postville, Iowa Immigration Raid, May 12, 2008." Archdioceses of Dubuque. Accessed December 11, 2013. <http://www.arch.pvt.k12.ia.us/postvillerelief/pdf/dayofraid.pdf>.
- Menjivar, Cecilia and Leisy J. Abrego. "Legal Violence: Immigration Law and the lives of Central American Immigrants." *American Journal of Sociology*, 117. March 2012.
- "Motion for a New Trial." Justice for Sholom. Accessed December 11, 2013. <http://justiceforsholom.org/the-story/motion-for-new-trial>.
- Motomura, Hiroshi. "The Curious Evolution of Immigration Law: Procedural Surrogates for Substantive Constitutional Rights." *Columbia Law Review*, 92. November 1992. 1625-1704.
- Moyers, Peter R. "Butchering Statues: The Postville Raid and the Misinterpretation of Federal Criminal Law," *Seattle University Law Review*, 32. 2009. 651-687.

- Padilla v. Kentucky. 08-651. U.S. Supreme Court, 2010. Accessed December 11, 2013.  
<http://www.supremecourt.gov/opinions/09pdf/08-651.pdf>.
- Peterson, Cassie L. "An Iowa Immigration Raid Leads to Unprecedented Criminal Consequences: Why ICE Should Rethink the Postville Model." *Iowa Law Review* 95. 2009.
- Taste of Postville Collection. The Postville Project Digital Collection. Accessed December 1, 2012.  
<http://cdm15897.contentdm.oclc.org/cdm/compoundobject/collection/post/id/474/rec/2>.
- Preston, Julie. "27-Year Sentence for Plant Manager." *The New York Times*. June 21, 2010.
- Preston, Julie. "Life Sentence Is Debated For Meat Plant Ex-Chief." *The New York Times*. April 28, 2010.
- Public Law 104-208, Illegal Immigration Reform and Immigrant Responsibility Act of 1996,  
<http://www.uscis.gov/sites/default/files/ilink/docView/PUBLAW/HTML/PUBLAW/0-0-0-10948.html>.
- Rubiner, Betsy. "A Year After the Flood, Cedar Rapids Struggles." *TIME*. June 17, 2009.
- Scherer, Ron. "Parkersburg, Iowa, Emerges as Model for Tornado Recover." *Christian Science Monitor*. June 7, 2011.
- "Taste is BIG Success." *The Postville Herald-Leader*. August 16, 1998.
- "The U- Turn: A Transformational Story." Maya Media Corp. Accessed December 9, 2013.  
<http://www.theurnfilm.com/welcome.html>.
- "Total Population for Iowa's Incorporated Places: 1850-2000." Iowa Data Center. Accessed December 1, 2013.  
<http://data.iowadatacenter.org/datatables/PlacesAll/plpopulation18502000.pdf>.
- U.S. Courts for the Ninth Circuit. "Due Process In Immigration Proceedings."  
[http://cdn.ca9.uscourts.gov/datastore/uploads/immigration/immig\\_west/E.pdf](http://cdn.ca9.uscourts.gov/datastore/uploads/immigration/immig_west/E.pdf).