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Collective Liminality: The Spillover Effects of Indeterminate Detention on Immigrant Families

Mirian G. Martinez-Aranda

This article introduces the concept of *collective liminality*, a shared condition of heightened threat and uncertainty experienced by immigrant detainees and their families, as they wait, caught between two possible outcomes: their loved one's (temporary or permanent) release into the US or deportation. Drawing on 2 years of ethnographic data collection between 2015 and 2017 that included accompanying families to visitation at three Southern California detention facilities, and in-depth interviews with former detainees and their relatives, I demonstrate the broader "collateral consequences" that immigration detention inflicts on detainees' loved ones. I find that not only does the detained individual experience liminality, but the detention of a loved one places the family in a state of shared liminality, which is experienced at two levels: *material and emotional*. These hardships materialize even before the detainees' deportation and can persist even after their release back into the US. This research extends scholarship on the impacts of detention on detainees, and on the consequences of deportation for families. The concept of collective liminality highlights how immigration detention functions as a critical tool of immigrant surveillance, punishment, and exclusion.

> I thought my wife was going to get deported. My biggest fear was not knowing if she was going to come home. She got transferred closer, and we could finally visit her. My son didn't like leaving the visits; he always wanted to stay. He would ask, "When is mommy coming home?" My wife always said that it was hard because she had to stay there, and we got to go home.

Anthony explains the impact of his wife Silvia's immigration detention on their family. Silvia, an immigrant from the Philippines and mother to three young children, was detained at two

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Please direct all correspondence to Mirian G. Martinez-Aranda, University of California, 264 Haines Hall, Los Angeles, CA 90095-1551; e-mail: mirian.martinez@ucla.edu

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different detention facilities—a contracted local jail and a private facility—in Southern California for a total of 3 years.

In the US, rates of immigration detention have steadily grown in recent years (Singer 2019). In 2018, US Immigration and Customs Enforcement (ICE) detained nearly 400,000 immigrants (Singer 2019). This increase in detention has generated economic, emotional, and social harms for both detainees and their relatives. Of the 226,400 deportations in 2019, 85 percent of these removals were of immigrants incarcerated in detention facilities (ERO 2019). Families are thus justified in fearing that their loved one's detention may lead to deportation. Although deported immigrants could potentially attempt to return to the US, such a choice involves risking their lives and exposing themselves to prison time (Cabanillas 2017). Furthermore, attempts to return to the US are dangerous (De León 2015), and family reunification may take years. Thus, the fears of deportation and indefinite family separation are realistic. This article examines how immigrant families experience the spillover effects of indeterminate detention of their loved ones under the intensified threat of deportation. By indeterminate detention, I mean prolonged detention without a finite release date (Ryo 2017).

Based on in-depth qualitative interviews with fifty-five respondents in twenty immigrant family units and field notes from 2 years of ethnography gathered while accompanying families on visits to three Southern California detention facilities between 2015 and 2017, this study develops and illustrates a new analytical concept, *collective liminality*. When an immigrant is detained, the family unit becomes suspended in a heightened state of uncertainty over whether the detention will lead to deportation and produce forced family separation. This heightened state of uncertainty is compounded by both material and emotional hardship. Relatives endure material harms and economic uncertainty (Chaudry 2011; Dreby 2012; Koball et al. 2015; Slack et al. 2015). They experience emotional hardship upon learning of their loved one's detention. Emotional distress is compounded by not knowing how long the detention will last (Golash-Boza 2019; Koball et al. 2015), and fears that their relative will be permanently exiled (Allen et al. 2015; Chaudry 2011; Dreby 2012; Koball et al. 2015; Zayas 2015). Certain structural features of immigration detention amplify and reinforce these harms. Remotely located facilities create geographic barriers that isolate detainees from their families and strain their relationships. Families' interactions with facility employees, ICE agents, and judges heighten their sense of vulnerability, fear, and sometimes humiliation. When detainees and their families cannot afford legal counsel, bonds are denied or set at an unattainable level, extending the length of detention.

The contribution of this research is to expose indeterminate detention's corrosive effects for both detainees and their entire

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family network: heightened uncertainty, economic harms, and the constant fear of family separation through deportation. Building on work by Ryo and Peacock (2019) and Mountz (2012), who find that social networks can affect a detainee's length of detention, I show how family units are harmed by the institutionally produced liminality of a loved one's detention. At the detention facility, the guards and staff personify the system of detention and reinforce the family members' feelings of powerlessness and uncertainty. The law as an institution also creates legal categories, such as "illegal" and "criminal alien" (De Genova 2004), which contributes to the condition of collective liminality by making immigrant families vulnerable to abuse and deportation. Also, legal processes, such as mandatory detention (Toma 2017), which requires that noncitizens with certain triggering criminal convictions be detained (as permitted under the 1996 Anti-terrorism and Effective Death Penalty Act and the 1996 Illegal Immigration Reform and Immigrant Responsibility Act) (ACLU 2020) contribute to the collective material and emotional harm.

This study complements current scholarship that focuses on the impacts of detention on *detainees* (Kelly 2019, Jorgensen 2017, Patler and Golash-Boza 2017, Penn State Law Center for Immigrants Rights Clinic 2017), and on the consequences of *deportation* for families (Golash-Boza 2019). I build on this research by arguing that damage to families emerges when the looming, ever-present *threat of deportation* becomes more intense and tangible at the moment a loved one is detained. The concept of collective liminality highlights how immigration detention functions as a critical tool of immigrant surveillance, punishment, and exclusion.

Theorizing Liminality and Collateral Consequences

This study's theoretical framework brings together research on liminality and collateral consequences of incarceration. Liminality, a classical concept used to examine ritual processes, refers to the condition *of individuals w*ho are suspended in a transitional period from one life stage to another (Turner 1967; Van Gennep 1960). Turner (1967) conceptualized these personal moments of transition as positive and transformative. However, migration scholars (Gold 2019; Menjívar 2006; O'Reilly 2018) have raised the concern that the ambiguity inherent in liminality is often frightening and disempowering for immigrants stuck in "gray areas" that exist between conventional categories of immigration statuses that Menjívar (2006) calls "liminal legality." This legal limbo is marked by ambiguity, infusing immigrants with characteristics of both legal and "illegal" statuses. Menjívar builds on Coutin's (2000) concept of

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"legal nonexistence," which describes the tenuous position of undocumented Central Americans in the US, as they lack legal recognition. Legal nonexistence enables the erasure of personhood and basic rights, rendering immigrants vulnerable to subjugation, state violence, and deportation.

The burden of legal nonexistence and the looming threat of deportation are omnipresent, shaping and constraining the lives of undocumented immigrants (Dreby 2012, Gonzalez 2016, Martinez et al. 2015, Menjívar and Abrego 2012). Undocumented adults and youth alike come to understand that they will face risks and be denied myriad rights (Enriquez 2020; Gonzalez 2016). Indeed, all members of mixed-status families, regardless of immigration status, inhabit an environment that is permeated with illegality and the threat of deportation (Enriquez 2020, Rodriguez 2016). This threat is always percolating in immigrant communities, and immigrants' fears are justified in light of the devastating harms unleashed by removal. This "context of illegality" (Enriquez 2020) enables and justifies legal violence. "Legal violence" captures the material, psychological, and social injuries (e.g., the pain of family separation through permanent exile) that immigration laws inflict on undocumented immigrants within institutional settings and by institutional actors (Menjívar and Abrego 2012). Enmeshed in the limbo produced by tenuous legal statuses, immigrants find themselves vulnerable and constrained. Hasselberg (2016) explains, in her study of immigrants in the UK, that this kind of uncertainty is "intrinsically related to waiting" (e.g., for a hearing or appeal) and that long-term waiting is "a further punishment" where "time stands still" (102–3). As useful as these studies have been in illuminating the ever-present, anticipatory threat of deportation that hangs over immigrant communities, they do not examine how immigration *detention* affects detained immigrants and their loved ones.

Detained immigrants in the US can be jailed indefinitely (Immigration and Nationality Act 2012, 8 U.S.C.§ 1226(a)) without the possibility of a bond hearing for their release, while they litigate their deportation cases (*Jennings v. Rodriguez* 2018). Indeterminate detention produces a state of intense ambiguity and disorientation while detainees wait to be released to the community or be deported from the country (Griffiths 2013, Hasselberg 2016, Turnbull 2016, Turner 1967). Detainees feel a chronic sense of fear, insecurity, and powerlessness as they live under the terrifying possibility of expulsion (Sutton et al. 2011). O'Reilly (2018) calls this experience of liminality as a permanent state of being "ontological liminality." Beyond understanding detainees' experiences of living in liminality, a crucial question remains about how indeterminate detention impacts their loved ones.

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Even short detentions produce both individual harms, to detainees, and collective harms, to their loved ones. Ryo and Peacock (2019) explain that "even temporary confinement can inflict deep physical and psychological trauma, and lasting financial hardship, not only on the detainees but also on their family members" (1254). However, the shorter the detention length, the shorter the period of time a detainee and their family network must endure these harms and uncertainties. Ryo and Peacock (2019) found that community contexts matter: for detained immigrants, having access to legal and social support is associated with shorter periods of detention. When detainees are unable to access legal counsel or when they have weak community or family ties in the local area, spatial inequality and the social ecology of the community surrounding the detention facility function to extend the length of detention. During this time, detained immigrants may be deprived of what Mountz (2012) refers to as an "infrastructure for advocacy" (92). The remote location of many facilities compounds the detainees' separation from legal resources, relatives, and community networks (Mountz 2012). The present study examines how prolonged detention without a release date can extend the state of liminality and compound the harms experienced by detainees and their families.

In the related mass-incarceration literature, isolation and separation from resources and social supports have been shown to damage incarcerated people and to inflict collateral consequences upon their loved ones (Braman 2004; Mauer et al. 2003). For example, incarceration undermines family cohesion because incarcerated men are liminally positioned: at once members of their families and separated from them (Turney 2015). Turney (2015) extends Turner's work on liminality by showing that because incarcerated men are "essentially held captive," their contact with intimate partners is always organized and monitored by a punitive institution, which makes the nature of that contact limited and regulated, to the detriment of that relationship (Turney 2015: 501).

These strains on the relational well-being of members of the family network—collateral consequences—are replicated in the context of immigration where families face profound consequences, such as family separation, emotional trauma, and economic instability (Enriquez 2020; Koball et al. 2015). This family spillover effect, a mechanism of "social suffering" (Kleinman et al. 1997) that directs harm towards loved ones, has been documented in the context of *deportation*. Golash-Boza (2019) finds that families of deported immigrants experience collateral consequences that are similar to those felt by family members of incarcerated people (Comfort 2003; Turney 2015). Deported individuals may have partners and children who depend on them

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for a myriad of economic, social, and emotional support. Many immigrants who face deportation are crucial breadwinners for their families, which places their relatives in a state of economic crisis (Chaudry 2011; Dreby 2012; Koball et al. 2015; Slack et al. 2015). Subsequent harms may take several forms: income instability, housing insecurity, food insecurity, diminished physical and mental health, emotional trauma, and lack of parental presence (Allen et al. 2015; Chaudry 2011; Dreby 2012; Koball et al. 2015; Zayas 2015). Following deportation, it becomes challenging to maintain family cohesion, since many families experience permanent separation, unless they reunify through de facto deportation (Boehm 2017, Kanstroom 2012). Relatives may grapple with how to explain to children that their "parent has not abandoned them yet will not be able to come home" (Golash-Boza 2019: 1334). Furthermore, families in the US fear for the safety of deported relatives who may now face violence, extortion, kidnapping, or death (Brabeck et al. 2011, Golash-Boza 2015, Human Rights Watch 2020).

While Golash-Boza (2015) emphasizes the social harms wrought by deportation, families are also affected during *detention*. Immigrants held in ICE detention are not given a release date. Detention can last indefinitely and lead to deportation, which creates substantially greater uncertainty for the detainee and their family. And unlike the families of deportees, for whom the separation is commonly definite and final, the families of detainees are suspended in time between the possibility of reunification and permanent separation.

In this study, I bring together the two bodies of literature on liminality and collateral consequences to develop the new analytical lens of *collective liminality*. By linking the idea that liminality impacts social networks, I analyze how families of detainees experience their loved one's detention. The harms of immigration detention likely extend far beyond the detained individual, thus justifying an investigation into how the damages radiate out, affecting families in marginalized immigrant communities. The threat of deportability—a familiar fear in immigrant communities—might be experienced differently by detainees and families when an individual is detained. Here, I examine the nature and scope of the harms of detention, and specifically, the extent to which the trauma is not a solitary experience, but rather, a collective one, as families struggle against the terror of legal violence and the threat of permanent separation. This research provides insights on/illuminates how family networks realign their priorities and activities when they are forced to cope with the intensified threat of a loved one's deportation. Simultaneously, and like their detained relatives, families experience the powerlessness of

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uncertainty about the duration and outcome (release versus deportation) of detention.

Defining Collective Liminality

Collective liminality arises when the harms of being stuck in an in-between status radiate out to affect others in the trapped individual's network. In the context of this study, collective liminality is a shared condition of constant uncertainty experienced by detainees and their families, caused by the intensified threat of deportation that produces material and emotional hardships. Collective liminality's uniqueness stems from the combination of the indefinite nature of immigration detention and the precarious nature of immigrants' (and family members') legal status. Undocumented immigrants and their families live with the vivid, intrusive fear of being deported by ICE. But upon detention, the threat of deportation shifts from "if" to "when," from the anticipatory threat of deportation to managing detention to prevent deportation, from avoiding contact with ICE to coping with immigration enforcement head on, constantly, and with extremely high stakes. Once detained, the threat of deportation intensifies, while also altering the specific activities that families must engage in to protect their loved one. Not only is apprehension a necessary precursor to deportation, it actively constrains the ability to prevent deportation, through restrictions on movement and communication, greater difficulty accessing support from relatives and attorneys (Ryo & Peacock 2019), and fewer options for avoiding deportation. Undocumented family members may feel particularly helpless because they have to continue to avoid ICE while also trying to fight their loved one's deportation (Martinez-Aranda 2020). Thus, collective liminality begins at the moment an immigrant is apprehended and is plunged into a state of desperation and prolonged waiting. The apprehended person's loved ones—spouses, partners, children, parents, siblings, extended family networks and sometimes community members—are simultaneously pulled into this in-between state.

I argue that collective liminality manifests on two different levels: a material level and an emotional level. Both the material and emotional harms are shaped and sharpened by the dual attributes of collective liminality: its temporal indeterminacy and the precarious legal status that stokes the fear of deportation. At the material level, detention creates financial burdens immediately. Then, the indeterminacy of detention drives families into a state of economic precarity. Unable to plan for the future, the family network becomes trapped in a state of collective liminality from a

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material standpoint. At the emotional level, the detained individual and their relatives experience a reciprocal loss: they are deprived of one another and of crucial everyday intimacies. The family feels the pain of temporal indeterminacy because they cannot count down to a known release date. Moreover, they endure the fear of the ultimate punishment: permanent exile and family separation, enabled by a precarious legal status that can be weaponized to deport loved ones. The framework of *collective liminality* thus captures the harmful spillover effects experienced by families when a loved one is detained.

Methods: Families and their Detained Relatives

This qualitative study is based on 2 years of ethnographic fieldwork, in Southern California between 2015 and 2017. I conducted in-depth, qualitative, semi-structured interviews with former detainees and their relatives. I spoke with at least two members from each family unit, enabling me to present findings from the perspectives of both detained individuals and their loved ones. I interviewed a total of fifty-five respondents in twenty different family units. Of these fifty-five respondents, I accompanied twenty-five of them on their drives to visit their detained relative(s) in three immigration detention facilities: one for-profit private detention facility and two ICE-contracted local jails. These drives became an opportunity to "go-along" (Kusenbach 2003) with participants and record our candid conversations before and after salient visits with their loved ones. Through these data, I reveal that the uncertainty and constant threat of deportation affects not only the detainee but also spills over to their relatives.

The data were collected in the counties of Los Angeles, Orange, and San Bernardino. The counties are appropriate sites for two reasons: first, a large number of immigration-related apprehensions are made in these counties (TRAC 2017), and the majority of apprehended immigrants are detained in facilities located within these counties (Human Rights Watch 2017). Second, California has more detentions and deportations than any other state, second only to Texas (TRAC 2018).

During my fieldwork, I also built relationships with one nonprofit faith-based organization and three pro-immigrant community groups. The faith-based organization is recognized by the Board of Immigration Appeals, and their mission and work includes practicing immigration law and offering legal representation for low-income and indigent persons. Nested within this organization is the "Visitation Program," the primary program through which I accessed potential respondents. In my volunteer

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work with the Visitation Program, I facilitated connections between detainees and their families by providing transportation, visiting, writing letters, and connecting phone calls that were coming from inside detention. Through the pro-immigrant community groups, I attended community rallies, court appearances, visits with attorneys, and events. These organizations and programs strive to give immigrants tools to endure the pervasive anti-immigrant environment. Because of my affiliation with pro-immigrant groups, I was perceived by respondents as someone reliably invested in their well-being. My own positionality as an immigrant with now-acquired privilege, social capital, and citizenship (Emerson 2001) both facilitated a trustworthy relationship with the participants and also allowed me to advocate for them. I met families through my involvement with these organizations and by participating in their events. I relied on key community informants to recruit an initial wave of respondents. I then recruited additional participants from interviewees' family networks, through snowball sampling.

During the study period, I conducted semi-structured interviews with thirty-five family members (eleven men and twenty-four women) who had a relative in detention and twenty formerly detained immigrants (eight men and twelve women). The sample of family members consisted mostly of women because when an immigrant is apprehended, their female relatives—wives, mothers, sisters, girlfriends, daughters—frequently step in to provide support and coordination from outside of detention. Just as women comprise the majority of visitors to prisons (Comfort 2003), most of the visitors to the immigration detention facilities observed during this study were women. However, to ensure that men would be included in the sample of relatives, I expanded my interview sample by recruiting respondents at community events, and events organized by local pro-immigrant organizations at which I volunteered.

Of the twenty formerly detained immigrants, fifteen were released back into the US and five were deported. At the time of sampling, the detainees' outcomes (release into the US versus deportation) were unknown. Ultimately, the sample overrepresents released immigrants and underrepresents deported ones. The sample is distinct because my first point of contact was with individuals in the community who had a detained loved one. Deportation is far more likely if a detainee lacks relatives in the US who are poised to take legal action on their behalf, and I was accessing detainees through such relatives. Furthermore, I faced difficulty maintaining contact with deportees, all of whom became unreachable within a few months of removal. However, since the sample included people with both outcomes, my study contributes

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insight into the lives of both groups. Whereas the data show only a glimpse of the worst and most common outcome (deportation), I offer extensive evidence of the extreme fear and hardship endured even by individuals who manage to secure release into the US, as this category includes those who have won their cases and those who have been released on bond and/or other conditions during the pendency of their removal proceedings. These individuals may possess logistical advantages compared to deported immigrants. These logical advantages may include advocacy of savvy relatives who understand how to coordinate with attorneys and immigrants rights groups, and stronger family ties and greater access to community resources. And yet, these advantages do not guarantee a successful case outcome. For instance, immigrants who secure only temporary release (Ryo 2016) remain in a state of liminality and upheaval. Thus, individuals who secure release back into the US may struggle profoundly within a punitive and violent legal context.

Respondents were between 18 and 75 years old and were born in many countries: Mexico (sixteen respondents), USA (seven), Honduras (nine), Guatemala (eight), Cuba (four), Ethiopia (three), Colombia (two), El Salvador (two), Philippines (two), and Somalia (two). The interviews lasted 1–2 hours and were conducted in Spanish and English either by phone or at a location selected by respondents, usually their homes, coffee shops, or pro-immigrant organizations. Respondents were assigned pseudonyms to protect their confidentiality. The questions were open-ended and addressed topics including the social, emotional, and economic effects produced by a relative's detention; thoughts and feelings about the possibility that a relative might be deported; and their encounters with the apparatus of detention. These questions included, for example: Could you tell me how you found out your loved one was detained? How are you dealing with your loved one's detention? How do you feel when you go visit him/her? What worries you now that your loved one is in detention, and why?

Ethnographic observations and qualitative interviews constitute suitable data sources, given the study's objective of examining how families experience the spillover effects of indeterminate confinement of detained immigrant relatives. The focus on interpretation from the perspective of detainees and their relatives makes ethnography and qualitative interviews the preferred methods. Furthermore, by using the hybrid "go-along" ethnographic tool (Kusenbach 2003) to complement the observations and interviews, I accompanied participants as they experienced family visitation, release from detention, and community events. Through the "go-along," I documented direct experiences of participants' interactions with the apparatus of detention including facility officers,

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other staff members, and community members. With respondents' consent, I audiorecorded informal conversations that took place during long drives to and from detention facilities. These "go-alongs" added texture to the data because respondents were particularly candid as they processed what they just experienced when visiting their loved one in detention. The transparency of the results and straightforward nature of the analysis allow for replicability of findings.

I transcribed and coded the interviews, "go-along" recordings, and field notes to detect emergent themes. Using Dedoose, a qualitative analysis program, I applied an open-ended coding process and generated memos based on patterns in field notes and interview transcripts. I searched for noteworthy themes, comparisons, and contrasts. The analytical strategy relied on deductive and inductive coding approaches. The deductive aspects of the analysis involved coding notes and transcripts for the themes of "fear of deportation," "uncertainty," "economic precarity," and "emotional stressors." Furthermore, I applied a grounded-theory inductive method (Charmaz 2006) to allow for patterns that were not anticipated by previous research, but rather, emerged from the narratives and interviews. The inductive methods created space for respondents' own meanings and interpretations to move to the foreground. This yielded insights about "collective liminality." The analysis focuses on phenomena that occurred repeatedly. Below, I discuss respondents and encounters that relate to relevant literature and theory, while also illuminating the data's most prominent themes.

Findings

Detainee Experiences of Liminality

Previous literature demonstrates that immigrants face uncertainty and abuse while in detention, which produces anxiety for detainees (Kelly 2019, Penn State Law Center for Immigrants Rights Clinic 2017). The evidence presented here, gathered through interviews and observations, confirms these findings. I show that detainees are suspended in this state of detention, caught between two possible outcomes: release into the US or deportation. This condition of liminality is uniquely harmful because it combines the indefinite nature of detention with precarious legal status to create the heightened threat of permanent exile. The experience of liminality is multidimensional, beginning when an individual enters a state of shock when they are first apprehended and separated from loved ones, often by great geographical distances. From there, they are emotionally taxed by the

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indeterminacy of detention and the constant threat of deportation, which combine to produce a profound sense of vulnerability.

The unique indeterminacy of detention places stress on detainees. Since ICE has the authority to indefinitely detain noncitizen immigrants, respondents justifiably fear getting trapped in the system. Ali, a 21-year-old asylum seeker from Somalia says,

> Being in detention was torture. I didn't know what was going to happen to me. They wanted to deport me, but there is no Somali government, and I didn't have a passport, so it was always a game for them. Some days, they'd scare me and say, "We are sending you back." "How is that possible?" I said, "I don't have a passport." But then, they would come at night and ask me to roll up my bed and I thought, "they are going to deport me," but I was transferred to Texas.

Ali's statement shows that, without proof that he was a Somalian citizen, ICE cannot deport him. Ali's liminal status is augmented by his lack of documentation as a citizen of *any* nation. He endured the torment of being transferred haphazardly within the US for 3 years, with no end in sight. Although his goal was to be granted asylum to remain in the US, Ali indicated that two terrifying and more likely possibilities weighed on his mind constantly: he would either be trapped in ICE detention indefinitely or returned to Somalia where he might die in the civil war. A feature of collective liminality that makes detainees' uncertainty more poignant is the anxiety of not knowing when or how the detention will end.

Respondents, made vulnerable by their precarious legal status, acutely experience the *constant* threat of deportation. Braulia, a 22-year-old attempting to apply for asylum to escape imminent violence she faced in Honduras, feared that she could be deported at any moment. Her fears are echoed by many and are rooted in the reality that deportation may mean physical danger and even death. She explains, "Everyday I was afraid that they were going to come and take me away… In the middle of the night they would come and take people away and no one knew where they took them…I pleaded with them, I told them that my rapist was going to kill me, but they didn't listen." Braulia feels terrorized by seeing other detainees disappear without explanation and endures the mental punishment of wondering whether she will be deported without warning too. According to many respondents, guards will sometimes instruct detainees to "roll-up" their belongings and "head to processing" for deportation. Then, just as suddenly, they are told that their stay of removal has been approved, and they are ordered to return to detention. Thus, the looming threat of deportation is

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deployed as a type of psychic punishment. In this way, the respondents felt that detention staff weaponized uncertainty.

Together, the indeterminacy of detention and the constant threat of deportation compound to produce liminality. Moreover, certain conditions within detention amplify detainees' sense of extreme vulnerability. Respondents discussed overcrowding, inadequate access to medical treatment, and insufficient amounts of nutritious food, hygiene supplies, telephones, legal services, and library materials. Accordingly, the detainee feels demoralized, out of control, and afraid. Without a clear sense of how they will obtain release, the detainee is trapped in a state of liminality, between uncertain and high-stake outcomes: release into the US or deportation. The harms wrought upon immigrants in this situation spill over to loved ones, producing a state of *collective liminality*.

Experiencing Collective Liminality: Material and Emotional

Immigration detention produces a liminal state because it is indefinite and leads to uncertain outcomes: release into the US or deportation. Detainees experience a liminal state while in confinement; however, their liminality does not remain contained within the walls of detention facilities. Instead, the harms and stresses of being trapped in this transitional state radiate out to affect loved ones as well. This spillover effect captures the transformation of an individual liminal state into a collective experience. Detainees' families endure consequences that resemble the collateral damages inflicted on the family networks of criminally incarcerated individuals. Indeed, detainees, like criminally incarcerated individuals, are institutionally confined, and families in both situations often experience the absence of parents, breadwinners, and loved ones; increased precarity related to food and housing insecurity; additional financial burdens (e.g., attorneys, commissary); and emotional trauma.

What distinguishes immigration detention—and what gives collective liminality its unique character—is that all of these hardships are infused with and heightened by the understanding that this taxing condition is temporally indefinite and may produce permanent family separation through deportation. The vulnerability, in turn, yields intensified fear and uncertainty for the entire family unit, as the threat of deportation shifts from "if" to "when." The families can no longer avoid the looming threat of deportation, as they must now actively manage detention to prevent their loved one's deportation. Thus, the detention of a loved one places the family in a state of collective liminality, which is experienced at two levels: material and emotional.

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Collective Liminality at the Material Level

When an immigrant family's main breadwinner is detained by ICE, the family is immediately impacted and placed in a more precarious economic state. Families face dual challenges: a sudden loss of income and new, unexpected expenses. Detention pulls the earner from the labor force and prevents them from providing for their household. Immigrant families, including children, thus become vulnerable to food and housing insecurity and must stretch budgets and rearrange priorities to survive. Already facing economic precarity, families incur additional expenses such transportation to remotely located detention facilities and legal representation. Material hardship takes on a liminal character as families grapple with the reality that they have no control over how long the condition of detention will last. Temporal liminality, as a feature of collective liminality, makes matters worse for the family, as indeterminate detention produces indefinite attorney fees, indefinite costs associated with traveling to a remotely located detention facility, indefinite loss of income, and indefinite food and housing precarity. Furthermore, families strain under the possibility that indefinite, yet temporary, material losses may become permanent if the loved one is deported. At particular moments when the threat of deportation becomes magnified (e.g., a court date, a hearing before a judge, a deadline to file paperwork), the family's financial costs spike.

Sudden Loss of Income

The detention of one person can quickly produce collective material harms, dragging the family into a state of economic insecurity. Like most of the respondents interviewed for this study, Elsa, a 20-year-old daughter and US citizen, is poor, and this poverty was exacerbated by her father's detention in November 2016. Elsa's father, Roberto, a 50-year-old native from Mexico, had an asylum claim pending in immigration court and was working under an approved permit as a street fruit vendor. Roberto was apprehended during a routine ICE check-in related to his case, and his detention pulled Elsa and her entire family into a condition of collective material liminality. Her mother, a housecleaner, did not earn enough to pay the family's rent. To make ends meet, Elsa explains that she quit community college to work at her father's fruit stand, and her 16-year-old brother applied to McDonald's. They pooled incomes to cover household expenses for the family, including Elsa's own child and three younger brothers. Because Roberto's detention has no known end date, the family cannot plan around whether or when he will return to the fruit stand and contribute to his family's income again. Elsa's education is suspended

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indefinitely, and even the minor children in the household are placed in a situation where they must assume some responsibility for ensuring the family's financial survival.

This family is a representative example of a wider phenomenon. Every family in the sample faced some degree of financial distress following a loved one's detention. The most common financial difficulties were related to indefinite periods of lost income (which produced food and housing insecurity), disruptions to child care, and the necessity of reducing time spent on education to increase work hours—all of which could become permanent if deportation were to occur, and all of which became magnified in moments of heightened threat of deportation (e.g., court hearings).

Visitation Expenses

In addition to lost income and significant disruptions to the family's everyday finances, the detention of a loved one creates new expenses, including the high costs of visiting geographically remote detention facilities as well as providing financial support for the detained relative. Some scholars have noted that remote locations are chosen by ICE (Martin 2012) to hinder detainees' "infrastructures of advocacy" such as familial, community, and legal support (Mountz 2012). Geographical isolation, in turn, imposes economic burdens that erode family ties while also intensifying the collective fear of *permanent* family separation through deportation.

Although most families are willing to drive for many hours to see a loved one in detention, for most, it is financially prohibitive to see them regularly. Lourdes, age 25 and pregnant, explains how she and her mother Mariana experience her brother's detention and why it is difficult to travel to see him. Her brother Genaro, a 19-year-old paraplegic that uses a wheelchair, was taken to a detention facility located more than 340 miles (almost 6 hours one way, not accounting for heavy traffic conditions) from where Lourdes lives with her mother. Lourdes explains, "We don't have money to go visit. I have been sending him money for food, but it is not the same as seeing him and knowing he is ok…A friend [a detainee] told us that he got an infection and was hospitalized." Genaro's detention creates collective material liminality for Lourdes in the sense that he will be financially dependent on her indefinitely. Funds that she and her mother apply to his basic needs compete with efforts to raise money for a visit.

The geographical remoteness of the detention facility imposes both logistical and financial hurdles. Lourdes and Mariana do not know when or if Genaro will come home or if the family will be able to continue sending money, particularly given the new financial costs Lourdes is anticipating as a mother-to-be. During

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Genaro's 6 months in detention, Lourdes and Mariana never managed to see him. Even when Genaro was released from detention, Lourdes and Mariana could not afford to pick him up from the facility, and the family relied on an act of charity from a Los Angeles-based pastor to bring him home. The remote location of the facility heightens families' vulnerability by imposing economic hardships that undermine family cohesion. Other respondents in the sample succeeded in raising money for a visitation journey, but not everyone who reached the facility was able to see their loved ones since access to detainees is shaped by the facilities' regulations,[1] which may deny families access upon arrival.

Legal Expenses

The detention of a loved one also produces legal expenses. Every family in the study had difficulties affording legal counsel to represent their relatives. Having access to legal counsel not only helps the detainee and their families navigate the complexities of U.S. immigration laws but also allows the detainee to learn about their rights (Ryo and Peacock 2019). In addition, legal representation increases the likelihood of receiving a bond hearing (Eagly and Shafer 2015) and being granted bond (Ryo 2016, 2018). Families face heightened financial vulnerability as they attempt to raise money for legal representation. If they cannot, their detained relative is at a higher risk of deportation (Ryo and Peacock 2019).

Carolina, a 23-year-old low-income mother and US citizen, explains how she experiences her mother's detention and why it is difficult to travel to see her. Carolina's mother, Noemi, a 43-year-old native from Mexico, was apprehended by ICE at a gas station when she was on her way to work at the restaurant where she has been employed for 23 years. Noemi was taken to a detention facility located more than 160 miles (almost 3 hours one way, not accounting for heavy traffic conditions) from where Carolina lives with her siblings, Robert and Peter (ages 15 and 11), and her 1-year-old son. Carolina describes her desperation especially after her mother suffered a stroke while in detention: "I need to pay for my mom's lawyer. It is a lot of money. I can't stop working; I need to make the payments. If I don't pay, no one is going to help her." To cope with the additional costs, Carolina has been working more than 60 hours per week: a full-time job during the week and a part-time job during the weekend to raise money to pay an immigration attorney to work on her mother's

[1] Regular visiting hours vary across and within facilities. Loved ones may lack information about visitation schedules. Facilities may lockdown unexpectedly and can deny entry.

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case. Meanwhile, Noemi felt neglected when Carolina would not take Noemi's calls or visit: "I wanted her to come and see me but she would tell me that she didn't have time…How could she not have time?…I didn't know she was behind on the payments for the lawyer." Though difficult, Carolina managed to raise enough money to finance an attorney on her mother's behalf; nevertheless, she paid a high price: not being able to see her mother for 6 months while she was in detention.

Noemi's detention generates collective material liminality as it creates indefinite economic hardships for her adult daughter who is now responsible for paying the lawyer. Fortunately, because Carolina did fund her mother's legal counsel, Noemi received guidance in navigating the complexities of the immigration system (Ryo and Peacock 2019), which allowed her to be released from detention to continue fighting her deportation case. Overall, having access to capital to cover legal fees can potentially mitigate the imminent threat of a loved one's deportation, whereas lacking capital for these costs can heighten and extend the experience of collective liminality.

Thus, when families cannot successfully acquire legal counsel, the detainee may be denied a bond hearing or receive an exorbitantly high bond. For example, one study of immigration bond hearings in Southern California reported bond amounts ranging from $10,667 to $80,500, with an average of $30,000 (Ryo 2016). High bond or denial of bond can extend detention, prolonging the condition of collective liminality, wherein the family faces an intense period of uncertainty under the constant threat of permanent family separation. Estevan's cousin Maria was detained for 3 years. He could not afford to pay a lawyer or pay Maria's bond. Maria, a mother of three children (two of whom live in Honduras) and with no other family in the US, was given a high bond by the immigration judge, and because Estevan could not come up with the money, this extended Maria's detention. Estevan explains what happened to Maria:

> The judge told her to pay $15,000. She cried and begged the judge to lower the amount. She even told the judge that she was about to lose custody of her daughter, but this didn't move the judge. She asked me if I could come up with the money, and I told her it was impossible. How could I? I work cleaning houses with my wife. We don't make that type of money.

With such a high sum of money, Maria and Estevan knew that she could not be released from detention, and the pending threat of deportation continued to loom. Unable to raise the bond money or obtain transportation from ICE to attend the court

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hearing, Maria eventually lost custody of her youngest daughter Sofia.

Collective Liminality at an Emotional Level

The fear that deportation will divide a family indefinitely affects both detainees and their loved ones, producing a state of collective emotional liminality. After facing the initial shock of finding out that a loved one has been apprehended, the family bears the burden of the ever-present possibility that their relative will be permanently exiled. The indeterminacy of detention prolongs the uncertainty and anxiety, straining family relationships. Relatives struggle to maintain closeness; detainees' absence is felt in the families' everyday lives, and this affects their relational well-being. And although some families are able to maintain some cohesion through visiting their relatives in the detention facility, the apparatus of detention impedes intimacy. Suspended in time, punished and controlled within the apparatus of detention, the family unit experiences collective emotional liminality.

Initial Shock

Following the initial shock of learning that a loved one has been apprehended by ICE, family members cross into collective emotional liminality, a state of uncertainty and fear, where they wait for a resolution suspended in time. They may feel trauma from witnessing ICE apprehend a loved one or guilt if they feel responsible for the apprehension (e.g., they opened the door not knowing it was ICE). They might receive a phone call from a detention facility. Some people hear about an apprehension through informal means, such as news from someone else in their social network. They may discern this indirectly, such as when their loved one does not come home or misses a shift at work. The detention of a loved one pushes the family into collective emotional liminality, which begins as a state of desperation and confusion: they do not know who to call, how to find their relative, or where to search for help. The person must make sense of this new state before making plans or taking action to manage the detention of their loved one and to prevent deportation.

For example, Josefina, a wife, mother, and hotel worker originally from Mexico, explains how in early 2017 she was dragged into the state of collective liminality. She received a phone call from a man who said her husband, Eduardo, had been arrested and needed to be bailed out immediately or else he would be processed into immigration detention. "I just left work crying, feeling desperate, not knowing what to do. All I could think about was that he was going to get deported. It is the worst call you can

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receive." Eduardo had been stopped by police for a broken tail light, and Josefina was racing against time to secure a bail bond for him quickly. Even though Josefina managed to pay his bail bond, she was too late. Eduardo was already placed under an immigration hold, a notification issued by ICE requesting the jail to hold Eduardo, so he could be transferred to ICE detention. In the course of just a few hours, an immigrant's family can be pulled into collective liminality and cannot extract themselves, even if they react promptly.

Fearing the Consequences of Exile

Immediately after a loved one's apprehension, an immigrant family's pervasive concerns about deportation become more acute and tangible. Families share their detained loved one's fear of deportation and the violence they may face if removed. Camila's daughter, Nadia, was apprehended by ICE in a traffic stop that turned violent. Camila explained, "I was afraid that they [ICE] were going to do something to her [Nadia]. The way they took her was very violent… For days I didn't know where she was, and I thought that they already deported her." While Nadia's detention was brief, it was particularly intense and frightening because she was being acutely targeted for fast removal. Due to an ICE-imposed communications blackout, Camila feared they would be unable to communicate before ICE managed to deport Nadia. Camila's concerns were shared by Nadia's children, who were in the car with their mother at the time. Camila continued, "My grandkids were traumatized and everyday asked me, 'Grandma, where is my mom? Did they deport my mom?' And I tell them 'no, don't worry. The lawyer is going to help her.'" Camila's fear stems from the fact that Nadia's ex-husband has connections to human trafficking. Although Nadia is not connected to traffickers, if deported, she will be targeted by them and likely tortured or killed (Human Rights Watch 2020). In addition to fearing the violence her daughter would face, Camila must do the difficult emotional work of managing her grandchildren's anxieties about being permanently separated from their mother. The ever-present threat of deportation is not an isolated experience. Instead, it flares out beyond the detainee to produce traumas for the family, creating another aspect of this condition of collective emotional liminality, as relatives feel the pressure of desperately racing against time to prevent a loved one's permanent exile.

In addition, families experience anguish over the possibility that their relative will be deported to an unfamiliar country where they lack social networks. Anthony's wife, Silvia, a green card holder from the Philippines, arrived in the US with her mother at age 12. Anthony explains that Silvia has been detained for more

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than 3 years. "If they deport her, what are we going to do in the Philippines? We barely know anyone there…I live in fear that at any moment I'm going to get a call telling me that they are deporting her." The constant fear of Silvia's deportation strains the relational well-being of this family unit. Uncertainty about the future traumatizes Anthony and the children. He struggles with the possibility of having his family not only separated but dissolved. For Anthony, Silvia's deportation would mean choosing between staying in the US as a single parent for their children's well-being or moving the entire family to a foreign country where they have weak networks and few resources. In contrast, Silvia is pragmatic and unequivocal about her preference for Anthony and the children to remain in the US in the event of her deportation. She is steadfast in her commitment to providing her children with access to opportunities within the US, which they, as American citizens, would be able to leverage. "I told Anthony, 'I don't want the kids coming to visit me [in detention]'….They needed to understand that I might not come back; it was easier this way." Nonetheless, this decision could be forced on the family at any time, with short notice, which places them in a perpetual defensive crouch.

The Indeterminacy of Detention

The indeterminacy of detention—not knowing *how long* a loved one will be confined—is itself a source of anxiety and emotional strife. Nancy, a U.S. Citizen, native of Los Angeles, and mother of three children (Alan 8, Jimena 6, and Mikey 4), was eagerly counting down to her partner Theo's release from prison. With a definite release date, the family could plan for reunification.[2] However, the family's hopes were dashed when Theo, a native from Mexico, was transferred from prison to ICE detention, which made him far more vulnerable to deportation. He contrasted prison with detention, where, without a release date, he felt more helpless and pessimistic. According to Theo,

> Detention is torture, man…it's the waiting and not knowing a release date that kills you. If you told me, "You have a year to do," ah, cool, I'll do my year, keep myself busy, do my job, and count my days. But if you don't even know what day you are coming out, you are just living day by day.

At the beginning of a loved one's detention, a family can take actions on behalf of the detained person and support efforts for

[2] Not all US citizens held in the criminal justice system have a definite release date—for example, people in pretrial detention (Petersen 2020).

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release. Compared to the generalized fear of deportation felt everyday in immigrant communities (Dreby 2012, Gonzalez 2016, Martinez et al. 2015, Menjívar and Abrego 2012), Nancy's actions shift from "if" to "when" under the intensified threat of deportation once Theo is moved from prison to detention. For example, Nancy married Theo inside the detention facility in an effort to stop the now-acute threat of deportation. On the drive to the detention facility the morning of her wedding, Nancy explained, "This is so out of character for me, to marry him without my parents knowing and in there [detention]. I do it to help him, and for my kids because I want them to have their dad." Detention introduces a threat so dire that Nancy makes a life-altering choice she did not consider previously, while Theo was free or in prison.

Theo has been detained for more than 3 years in a private detention facility. Nancy and the children try to keep a tiny glimmer of hope alive indefinitely and feel the emotional toll of knowing that the hope could be extinguished at any moment. Nancy explains how Theo's indeterminate detention is affecting her family:

> Sometimes I feel desperate, because ICE can tell you something good but then, unexpectedly, things get worse. With these ups and downs, I feel anxious. I want this to stop. I want to feel that there is hope. I take it day by day and he [Theo] feels the same. Some days he is desperate, and some days he is fine. There are a lot of emotions: yes, maybe he is coming out! Then, no he is not. We are just waiting for him to come home.

Based on Nancy's statement, it is clear that the uncertain length of Theo's detention is a source of acute anxiety. Nancy also indicated that her experience is analogous to Theo's. Like Theo, Nancy and the rest of the family are "just waiting." The liminality is collective in the sense that they are on the same unpredictable emotional rollercoaster. The emotional toll of indeterminacy is severe. Over time, as appeals for release get denied, the family's hope fades as they have fewer options for blocking their loved one's deportation.

Uncertainty Is Intensified for Undocumented Relatives

Relatives that have an unregularized immigration status prevents them from seeing their detained loved ones. Such family members are already suspended in a legally liminal status (Menjívar 2006), which raises additional barriers to contact. While families experience this collective liminality, the uncertainty about permanent family separation is intensified because if they attempt to enter, they risk becoming vulnerable to detention themselves. This was the case for Jimmy, a 37-year-old marketing graduate

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and native from Colombia. Jimmy migrated to the US with a tourist visa and overstayed. Jimmy's fiancé Rosalia, a family lawyer and also a native from Colombia, was detained for more than 6 months. Jimmy faced a 3-hour drive to visit her; however, he could not enter the detention facility because he lacked proper documentation. A sense of isolation, experienced by the detainee and by loved ones, is reinforced by the inaccessibility of the facility. Rosalia's detention spilled over to affect Jimmy.

> It's a very complex situation. Being unable to see her because of my [undocumented] status, and the constant uncertainty of knowing that living inside [detention] is hard. The physical and mental pressure…the mistreatment and inadequate food. Hearing all that [from her] made me feel that I was going crazy. She's going through all that, and I was here free, not being able to help her.

Jimmy's account illustrates how detention harms this couple's relational well-being. Intensified uncertainty results in a state of collective emotional liminality for both Jimmy and his fiancé. Even though Jimmy was willing and able to surmount geographic distance, he could not overcome the barrier posed by his legal status. Going to visit Rosalia would place him in a situation where he would risk his own detention or deportation. Nonetheless, he managed to drive at least twice to the detention facility and park close enough with some binoculars in hope to get a glimpse of Rosalia during her yard time. He explained how waiting for Rosalia made him feel on edge because he was not able to help her. The case of Jimmy and Rosalia illustrates a broader phenomenon: detention collectively punishes detainees and their loved ones who lack immigration documents, by blocking visitation. In an attempt to navigate around this barrier, Jimmy paid documented friends to visit Rosalia, to check on her because he thought she was suicidal. However, she declined because she felt too humiliated to meet with them: "I didn't want anyone to see me like this, wearing a uniform and with no dignity, because they even take that away from you." Under collective liminality, the abusive conditions endured by detainees are particularly unsettling for family members because they are simultaneously grappling with temporal liminality and legal precarity. Not only is detention indefinite, but immigrants and their kin have limited options for legal recourse. Detainees then endure detention alone, isolated from relatives, while family members feel impotent and anguished because they cannot visit or help.

Toxic Culture of Detention

Research has shown extensively that detention facilities have a toxic culture of disregard and cruelty toward detainees (Kelly 2019, Jorgensen 2017, Penn State Law Center for Immigrants Rights Clinic 2017), thus creating suffering and traumas. When loved ones attempt to visit relatives in detention, they too come into direct contact with the facility's toxic culture. And like detainees, families encounter rules and regulations enacted by staff in ways that often feel arbitrary or disdainful. Visiting relatives wonder whether, when, and for how long they will be able to have contact with their detained loved one. Thus, the culture of disregard spills over to affect families of detainees which, in turn, produces collective emotional liminality.

Dolores, an elderly woman from Guatemala who does not speak English, encountered the toxic culture of the detention facility when she traveled from Los Angeles to try to locate her son Alejandro, who was being held at a detention facility 3 hours away. Dolores recalls that after waiting in line to be processed at check-in, she began speaking Spanish to a facility staff member, who looked at her with disdain, and in a derisive voice said in English, "I don't speak Spanish. I don't understand what you are saying." Frustrated, Dolores later said, "She [the staff member, Ms. Garcia] was lying, she spoke Spanish or at least understood what I was saying. She just didn't want to help me." Ms. Garcia looked through some paperwork cursorily for Alejandro's name and quickly concluded that he was not at the facility. Fortunately, another visitor with a smartphone helped Dolores locate Alejandro in the Online Detainee Locator System, which indicated that he was indeed at this facility. At this point, Ms. Garcia informed Dolores that Alejandro was not allowed to receive visits that day. After investing significant resources of time and effort to travel to and attempt to navigate the detention facility, Dolores was unable to see her son. Uncertain about whether or when he might be deported, Dolores felt desperate, and yet noted a silver lining: "At least I know Alejandro is here." The experience was needlessly upsetting because of the facility's institutional culture of dismissiveness, which intensified Dolores's anxiety.

Even when a detainee's deportation seems imminent, the apparatus of detention continues to impede contact among family members, which stokes anxiety and strains relational wellbeing. Families in this situation are denied the opportunities to say final goodbyes, achieve emotional closure, or plan for the future. After years in detention, Theo received a deportation order. Fearing that this would be the last chance for the family to be together, Theo's relatives—his mother Juanita, his wife Nancy, and his three young children—came to attend his court hearing and visit him in detention. With Theo's permanent exile looming, the

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family faced extremely stressful circumstances, which were intensified by torment and humiliation enacted by the facility staff. This family endured both arbitrariness and cruelty. Ordinarily, Theo would have been ineligible to receive visitors on this day, but he had obtained a type of special written permission informally referred to as a "kite." Unfortunately, no clear protocols governed whether the kite would be acknowledged. When the family arrived early in the morning, they encountered a staff member who accepted the kite, and the family was placed in a queue for visitation. However, the family waited for several hours, during which time the shift changed, and different staff members arrived on duty. These staff members rejected the kite and verbally abused and demoralized the family when Nancy became agitated at the possibility that the visit would be denied. Nancy said:

> They [officers] were punking us. They were being mean. He [Theo] already had an approved kite for three weeks. They feel that they have such authority. "You are like me [a woman of color]," I told them. I got so angry because they were making fun of me. When I told them, "I want to talk to the supervisor," they said, "She is the supervisor" and laughed. They were cruel. They saw Alan [8-year-old son] crying, but they didn't care.

Dismayed and increasingly desperate, the family tried to regroup in the waiting room. At this point, Nancy received a cell phone call from Theo, who was concerned that he had not been called for visitation. Inside detention, he had been growing progressively worried about why his loved ones had not yet been processed into the visiting room. Nancy said that Theo was worried that they were taking too long; he thought that they were going to see him right after court. After learning that the family was being denied entry, Theo told Nancy that he was going to try to find his deportation officer and let him know that the front desk was not allowing his family to visit. Both Theo and his family *share* the fear that he could be deported without the visit that the family had arranged through the kite. The sense of disempowerment and uncertainty radiates out from the detained person to his loved ones, stranding the entire group, on both sides of this administrative wall. Throughout the entire process, the family is stranded in a state of collective emotional liminality. The length of the wait is often unknown and can last hours, which frightens and demoralizes families. They endure extreme uncertainty produced by the institution, as staff members make inconsistent decisions about how the visit will proceed. The same kite yielded different responses from different staff members. The collective liminality is increased by the arbitrariness of the process, which changes with the whims of the staff on duty.

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As detainees and their families remain trapped in a state of collective emotional liminality, awaiting the terrifying possibility of deportation, they feel justifiable anxiety that permanent exile could begin at any moment. They endure a lack of control over their lives, as the detention of a loved one threatens to break the family unit. The emotional liminality is collective as anxieties flow in many directions: detainees worry that their young children will be frightened; relatives are distraught at the thought of a family member being detained in abusive conditions; spouses and partners agonize over whether their relationship can survive; families fear that a loved one, if deported, will be violently murdered abroad (Human Rights Watch 2020). The pervasive sense of vulnerability is rooted in relatives' inability to protect one another from harm.

Discussion and Conclusion

This research analyzes the collateral consequences inflicted when a family unit is suspended in a heightened state of liminality due to their loved one's indeterminate detention. The liminal state experienced by immigrants detained by ICE is not contained but, rather, transcends the physical walls of detention facilities, producing unaccounted harms to their families. From the moment that an immigrant is detained and processed into detention, they and their families enter a state of liminality with two potential outcomes: release into the US or deportation to their country of origin. I develop a new theoretical framework called collective liminality to show how being suspended in this indefinite state of confinement harms both detained immigrants and their loved ones. Studies have shown how even short periods of incarceration can harm the families of prisoners and detainees (Pelvin 2017, Ryo and Peacock 2019; Turney 2015). Other research shows how deportation hurts families (Golash-Boza 2019).

This study fills two gaps in our understanding of liminality and collateral consequences of confinement: I argue that the *liminality* of the carceral period itself harms detainees and their families, and that this harm begins prior to deportation, during the liminal period of *detention*. Detainees and their families may remain in this state for years. The vulnerability of the detainee, the humiliation of interaction with bureaucracy for the family, and the effects of being apart for an indefinite amount of time with an uncertain outcome combine to yield a profound impact on the lives of these families. My study reveals the specific character of collective liminality in this context: the heightened threat of permanent exile through deportation generates material hardship

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and emotional stress for the family network. Although the threat of deportation is ever-present in and harmful to immigrant communities, when a loved one is detained, the threat of deportation intensifies from "if" to "when." No longer avoiding contact with ICE, the family unit must now mobilize to protect the detained relative from impending exile. Accordingly, detention serves as a particularly pernicious form of social control.

I find that the threat of a permanent territorial expulsion creates a plethora of consequences for detainees and their families, at both material and emotional levels. The analysis first demonstrates that the detainee experiences liminality. The liminality is, itself, harmful, and those damages become collective the moment they begin impacting loved ones. In particular, the conditions of hardship endured by the detained person—the indeterminacy of detention and a legal status that makes one vulnerable to constant threat of deportation—combine and spill over to create vulnerabilities for relatives. The vulnerability, in turn, yields ongoing fear and uncertainty for the entire family unit, as it manifests in palpable material and emotional forms. These hardships assume a liminal character as families struggle to come to terms with the temporal indeterminacy of detention. They endure not only expenses, but indefinite expenses; not only pain, but indefinite pain.

The collateral consequences endured by family members are further exacerbated by the apparatus of immigration detention. Immigration detention is embedded within the institutional framework of immigration enforcement practices. Power relations between detainees and detention facility staff inflict psychological damage and erode immigrants' trust in the law and legal authorities (Ryo 2017). As detainees and their families remain suspended in a state of collective liminality, awaiting the terrifying possibility of deportation, they feel justifiable anxiety that permanent exile could become a reality at any moment. Instead of mitigating fear, the unique system of detention reinforces it, by creating geographic distance and imposing transfers (Ryo & Peacock 2018), as well as by increasing family isolation, extending detention when the family cannot afford legal counsel, and perpetuating an institutional culture of disdain and disregard for detainees and their loved ones. Together, these features contribute to a sense of powerlessness that distinguishes collective liminality from deportability. Nonetheless, families try desperately to secure their loved one's freedom against a ticking clock and a series of punitive bureaucratic hurdles. The challenges of being indefinitely suspended within this oppressive environment intensify an already-stressful experience.

This study also shows the value of bringing together disparate literatures on liminality and collateral consequences to advance a fuller understanding of how families of detained immigrants

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experience detention under the constant threat of permanent exile through deportation. Following Menjívar (2006), I contend that, for immigrants, liminality inflicts vulnerabilities and amplifies powerlessness, as it creates in-between spaces within which the state can impose dominance and control bodies. My study thus contributes to previous literature on the far-reaching effects of immigration detention. O'Reilly (2018) contends that this environment produces "ontological liminality" for detainees where liminality is lived in spatial and temporal terms. Similarly, Sutton et al. (2011) show that seemingly endless detention harms detainees. I join Golash-Boza (2019), Koball et al. (2015), and Turney (2015) in advancing the argument that carceral spaces, such as immigration detention, strain relationships and harm families. To this discourse, I further add that detainees' family members are pulled into this liminal space. Like the detained individual, the loved ones must wait under the constant threat of deportation while a process beyond their control unfolds.

Following research on the "collateral consequences" of mass incarceration, which documents how families of prisoners are impacted by the confinement of loved ones (Mauer and Chesney-Lind 2003, Pelvin 2017), I find that the families of detained immigrants endure emotional hardships. Previous research shows that families are harmed by the *deportation* of loved ones (Golash-Boza 2019, Rojas-Flores et al. 2017). My study contributes evidence that these harms *precede* deportation and actually begin manifesting during *detention*. Furthermore, I emphasize how these harms are rooted in the fear and uncertainty produced by liminal waiting. Unlike the families studied by Golash-Boza (2019), who already know the answer to the question of whether deportation will take place, my respondents demonstrate the damages wrought by the ever-present possibility of deportation, as detainees and their families suffer the trauma of wondering "Will deportation happen? When? Today?" As a loved one is held in detention, the family remains trapped in a liminal state as well. Because they are denied closure or resolution to the question of when or whether deportation (or release) will occur, it is difficult to maintain family cohesion. Many of the immigrants in detention are parents, and their absence has a profound emotional impact on their children. Some children are left in the care of other family members or friends, which affects the children's development. Many begin exhibiting problems at school or enter into depression (Chaudry 2011, Gonzalez and Patler 2020, Hagan et al. 2009, Rojas-Flores et al. 2017). Overall, families find it hard to maintain family cohesion because they face obstacles to visiting their detained family members, who are most likely confined in remote locations.

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The collateral consequences are not only emotional; they are also material. As Koball et al. (2015) have demonstrated, when an earner is removed from a family unit and placed in a carceral space, loved ones suffer financial vulnerability. Many detained immigrants are primary breadwinners for their families, so their confinement in detention triggers a state of economic crisis for their relatives, including partners, parents, and children (Chaudry 2011, Hagan et al. 2009). Families may endure food and housing insecurity, as they struggle to make ends meet. In addition, families must raise money to hire legal counsel to represent their loved ones at immigration court hearings. Thus, detention creates indefinite economic hardships and financial stressors for the entire family network.

In this study, the analytical lens of collective liminality illuminates the impact that liminality has on the detainees' family networks. In future research, this lens can be applied to other contexts in migration studies. For example, asylum seekers, most of whom are women and children from Central America, arrive at the US–Mexico border fleeing violence and economic insecurity. Under the 2019 Migrant Protection Protocol (MPP), these asylum seekers must wait for an indefinite period of time as their case is resolved (Department of Homeland Security 2019, Salazar Gonzalez 2019), which compels them to find temporary refuge in an unfamiliar border town. Thus, the lens of collective liminality can reveal how families affected by the MPP are trapped in a legal, spatial, and temporal limbo, during which time they are exceptionally vulnerable. Their future is uncertain and at the mercy of bureaucratic processes beyond the family's control.

Collective liminality can also apply to the families of missing persons. Sometimes individuals—ensnared in migration-related human trafficking or embarking on dangerous journeys led by *coyotes*—become missing persons. In *The Land of Open Graves*, anthropologist Jason De León (2015) examines the lives and brutal deaths of thousands of undocumented migrants who attempted to cross the Sonoran Desert of Arizona. De León uses the phrase "bare life" to describe people who have died these senseless and meaningless deaths. Collective liminality exposes how these lives and deaths do have meaning, and to whom. In particular, the relatives of migrants lost in the Sonoran Desert become trapped in a state of collective liminality, characterized by agonizing uncertainty over whether their loved one is alive and whether they will ever be located. Families feel a desperate and ongoing responsibility to search for and try to help their loved ones. Grassroots groups of paramedics, firefighters, and community members organize search parties to assist families who have lost relatives in the desert. Despite these efforts, the families have

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little control over whether the missing person will be recovered, and they may be forced to cope with an indefinite period of grief and a lack of closure.

A different avenue for future research should explore the long-term effects of detention on both detainees and family networks, particularly with respect to detention's impact on one's sense of identity and belonging. An examination of an extended marginal legality can lay bare crucial aspects of immigrant life essential for theorizing about immigrant punishment, surveillance, exclusion, citizenship, and belonging that lie at the core of varied forms of assimilation. My study shows that immigration detention benefits from docile, humiliated bodies that are easier to dominate and control. As families experience the combination of the toxic culture of detention and bureaucratic regulations, they are constantly reminded that they are both vulnerable and marginal. Citizenship affords protections. However, when relatives with citizenship status visit their detained loved ones, their own citizenship is held up for scrutiny. Their citizenship becomes tarnished and fragile as they endure the considerable stigma of being associated with someone who is viewed by the state as "illegal." Moreover, under the current anti-immigrant climate, people with undocumented loved ones may reasonably fear that their own protections could be altered or revoked. Even absent a legal reclassification, families may feel a heightened sense of marginalization whenever institutions communicate that this status apparently justifies detention, abuse, and exile.

Finally, if institutions communicate these messages persistently and over an extended period of time, detainees and their families may alter their beliefs and behaviors in response. Whereas the present research shows the real-time, short-term damages of being humiliated and harassed within the apparatus of detention as detainees and as visiting loved ones, these punitive interactions likely inflict long-term harms that warrant attention. Immigration detention likely shapes both attitudes and actions, as people come to realize that this institution presumes their criminality and will treat them with disdain and suspicion. The effects of state scrutiny stem from a long tradition of preserving the American racial hierarchy, which bears relevance for critical race and ethnic studies, and for crime and punishment among communities of color. Prior literature establishes that minority groups' racial identities are constructed as deviant and thus require legal control (Armenta 2017, Browne 2015; Kalhan 2014). As a form of social control, detention is particularly pernicious because if a loved one is ultimately exiled, the punishment is extended indefinitely, with few options for recourse.

References

ACLU. 2020. "Analysis of Immigration Detention Policies." Available at: https://www.aclu.org/other/analysis-immigration-detention-policies (accessed 21 September 2020).

Allen, Brian, Erica M. Cisneros, and Alexandra Tellez. 2015. "The Children Left Behind: The Impact of Parental Deportation on Mental Health." *J. of Child and Family Studies* 24: 386-92.

Armenta, Amada. 2017. "Racializing Crimmigration: Structural Racism, Colorblindness, and the Institutional Production of Immigrant Criminality." *Sociology of Race and Ethnicity* 3: 82-95.

Boehm, Deborah A. 2017. "Separated Families: Barriers to Family Reunification After Deportation." *J. on Migration and Human Security* 5: 401-16.

Brabeck, Kalina M., M. Brinton Lykes, and Rachel Hershberg. 2011. "Framing Immigration to and Deportation from the United States: Guatemalan and Salvadoran Families Make Meaning of Their Experiences." *Community, Work and Family* 14: 275-96.

Braman, Donald. 2004. *Doing Time on the Outside: Incarceration and Family Life in Urban America*. Ann Arbor, MI: University of Michigan Press.

Browne, Simone. 2015. *Dark Matters: On the Surveillance of Blackness*. Durham, NC: Duke University Press.

Cabanillas, Christina M. 2017. "'The Times they Are a-Changin': Sentencing in Illegal Reentry Cases and the November 2016 Amendment to USSG Sec. 2L1. 2 (b)(1)." *US Att'ys Bulletin* 65: 153.

Charmaz, Kathy. 2006. *Constructing Grounded Theory: A Practical Guide through Qualitative Analysis*. London: Sage.

Chaudry, Ajay. 2011. "Children in the Aftermath of Immigration Enforcement." *The J. of the History of Childhood and Youth* 4: 137-54.

Comfort, Megan L. 2003. "In the Tube at San Quentin: The "Secondary Prisonization" of Women Visiting Inmates." *J. of Contemporary Ethnography* 32: 77-107.

Coutin, Susan. 2000. *Legalizing Moves: Salvadoran Immigrants' Struggle for U.S. Residency.* Ann Arbor: University of Michigan Press.

De Genova, Nicholas. 2004. "The Legal Production of Mexican/Migrant 'Illegality'." *Latino Studies* 2: 160-85.

Department of Homeland Security. 2019. *Migrant Protection Protocol*. Available at: https://www.dhs.gov/news/2019/01/24/migrant-protection-protocols (accessed 08 February 2020).

De León, Jason. 2015. *The Land of Open Graves: Living and Dying on The Migrant Trail*, Vol. 36. Berkeley: University of California Press.

Dreby, Joanna. 2012. "The Burden of Deportation on Children in Mexican Families." *J. of Marriage and Family* 74: 829-45.

Eagly, Ingrid V. and Steven Shafer. 2015. "A National Study of Access to Counsel in Immigration Court." *University of Pennsylvania Law Rev.* 1-91.

ERO, U.S. Immigration and Customs Enforcement Fiscal Year 2019 Enforcement and Removal Operations Report. 2019. https://www.ice.gov/sites/default/files/documents/Document/2019/eroReportFY2019.pdf.

Emerson, Robert M. 2001. "Producing Ethnographies: Theory, Evidence and Representation." *Contemporary Field Research* 295.

Enriquez, Laura E. 2020. *Of Love and Papers: How Immigration Policy Affects Romance and Family*. Berkeley: University of California Press.

Golash-Boza, Tanya. 2019. "Punishment Beyond the Deportee: The Collateral Consequences of Deportation." *American Behavioral Scientist* 63: 1331-49.

Golash-Boza, Tanya Maria. 2015. *Deported: Immigrant Policing, Disposable Labor and Global Capitalism*, Vol. 6. New York: NYU Press.

Gold, Marina. 2019. "Liminality and the Asylum Process in Switzerland." *Anthropology Today* 35: 16-19.

Gonzalez, Gabriela and Caitlin Patler, *Sociological Perspectives* The Educational Consequences of Parental Immigration Detention 2020, http://dx.doi.org/10.1177/0731121420937743.

Gonzales, Roberto G. 2016. *Lives in Limbo: Undocumented and Coming of Age in America*. Berkeley: University of California Press.

Griffiths, Melanie. 2013. "Living with Uncertainty: Indefinite Immigration Detention." *J. of Legal Anthropology* 1: 263-86.

Hagan, Jacqueline, Brianna Castro, and Nestor Rodriguez. 2009. "The Effects of US Deportation Policies on Immigrant Families and Communities: Cross-Border Perspectives." *NCL Rev.* 88: 1799.

Hasselberg, Ines. 2016. *Enduring Uncertainty: Deportation, Punishment and Everyday Life*, Vol. 17. New York: Berghahn Books.

Human Rights Watch. 2017. "Immigrant Detention Centers in California." Available at: https://www.hrw.org/video-photos/map/2017/05/12/immigration-detention-centers-california (accessed 08 February 2020).

——— 2020. "Deported To Danger: United States Deportation Policies Expose Salvadorans to Death and Abuse." Available at: https://www.hrw.org/report/2020/02/05/deported-danger/united-states-deportation-policies-expose-salvadorans-death-and (accessed 08 February 2020).

Jorgensen, Christian. 2017. "Immigrant Detention in The United States Violations of International and Human Rights Law." Available at: https://silo.tips/download/immigrant-detention-in-the-united-states-violations-of-international-and-human-r (accessed 23 September 2020).

Kalhan, Anil. 2014. "Immigration Surveillance." *Md. L. Rev.* 74: 1.

Kanstroom, Daniel. 2012. *Aftermath: Deportation Law and The New American Diaspora*. New York: Oxford University Press.

Kelly, John V. 2019. *Concerns About ICE Detainee Treatment and Care at Four Detention Facilities*. Office of Inspector General. Available at: https://www.oig.dhs.gov/sites/default/files/assets/2019-06/OIG-19-47-Jun19.pdf (accessed 08 February 2020)

Kleinman, Arthur, Veena Das, and Margaret Lock. 1997. *Social Suffering*. Berkeley: University of California.

Koball, Heather, Randy Capps, Krista Perreira, Andrea Campetella, Sarah Hooker, Juan Manuel Pedroza, William Monson, and Sandra Huerta. 2015. "Health and Social Service Needs of US-Citizen Children with Detained or Deported Immigrant Parents." Urban Institute and Migration Policy Institute. Available at: https://www.migrationpolicy.org/research/health-and-social-service-needs-us-citizen-children-detained-or-deported-immigrant-parents (accessed 23 September 2020)

Kusenbach, Margarethe. 2003. "Street Phenomenology: The Go-Along as Ethnographic Research Tool." *Ethnography* 4: 455-85.

Martin, Lauren L. 2012. "'Catch and Remove': Detention, Deterrence, and Discipline in US Noncitizen Family Detention Practice." *Geopolitics* 17: 312-34.

Martinez-Aranda, Mirian G. 2020. "Extended Punishment: Criminalising Immigrants through Surveillance Technology." *J. of Ethnic and Migration Studies*. 1-18. https://doi.org/10.1080/1369183X.2020.1822159.

Martinez, Omar, Elwin Wu, Theo Sandfort, Brian Dodge, Alex Carballo-Dieguez, Rogeiro Pinto, Scott Rhodes, Eva Moya, and Silvia Chavez-Baray. 2015. "Evaluating the Impact of Immigration Policies on Health Status Among Undocumented Immigrants: A Systematic Review." *J. of Immigrant and Minority Health* 17: 947-70.

Mauer, Marc and Meda Chesney-Lind. 2003. *Invisible Punishment: The Collateral Consequences of Mass Imprisonment*. New York: The New Press.

Menjívar, Cecilia. 2006. "Liminal Legality: Salvadoran and Guatemalan Immigrants' Lives in the United States." *American J. of sociology* 111: 999-1037.

Menjívar, Cecilia and Leisy Abrego. 2012. "Legal Violence: Immigration Law and The Life of Central American Immigrants." *American J. of sociology* 117: 1380-421.

Mountz, Alison. 2012. "Mapping Remote Detention: Dis/Location Through Isolation." In *Beyond Walls and Cages: Prisons, Borders, and Global Crisis*, edited by Jenna Loyd, Matt Mitchelson, and Andrew Burridge, 91-104. Athens: University of Georgia Press.

O'Reilly, Zoë. 2018. "'Living Liminality': Everyday Experiences of Asylum Seekers in The 'Direct Provision' System in Ireland." *Gender, Place and Culture* 25: 821-42.

Patler, Caitlin and Tanya Maria Golash-Boza. 2017. "The Fiscal and Human Costs of Immigrant Detention and Deportation in the United States." *Sociology Compass* 11 (11): e12536.

Pelvin, Holly. 2017. "Doing Uncertain Time: Understanding the Experiences of Punishment in Pre-Trial Custody". Ph.D. diss., Department of Criminology, University of Toronto, Canada.

Penn State Law Center for Immigrants Rights Clinic. 2017. "Imprisoned Justice: Inside Two Georgia Immigrant Detention Centers. Proj. South Atlanta." Available at: https://www.safealternativestosegregation.org/resource/imprisoned-justice-inside-two-georgia-immigrant-detention-centers/ (accessed 23 September 2020)

Petersen, Nick. 2020. "Do Detainees Plead Guilty Faster? A Survival Analysis of Pretrial Detention and the Timing of Guilty Pleas." *Criminal Justice Policy Rev.* 31: 1015-35.

Rodriguez, Cassaundra. 2016. "Experiencing Illegality as a Family? Immigration Enforcement, Social Policies, and Discourse Targeting Mexican Mixed Status Families." *Sociology Compass* 10: 706-17.

Rojas-Flores, Lisseth, Mari L. Clements, J. Hwang Koo, and Judy London. 2017. "Trauma and Psychological Distress in Latino Citizen Children Following Parental Detention and Deportation." *Psychological Trauma: Theory, Research, Practice, and Policy* 9: 352-61.

Ryo, Emily. 2016. "Detained: A Study of Immigration Bond Hearings." *Law & Society Rev.* 50: 117-53.

——— 2017. "Fostering Legal Cynicism through Immigration Detention." *Southern California Law Rev.* 90: 999.

——— 2018. "Representing Immigrants: The Role of Lawyers in Immigration Bond Hearings." *Law & Society Rev.* 52: 503-31.

Ryo, Emily and Ian Peacock. 2018. "A National Study of Immigration Detention in the United States." *Southern California Law Rev.* 92: 1.

——— 2019. "Beyond the Walls: The Importance of Community Contexts in Immigration Detention." *American Behavioral Scientist* 63: 1250-75.

Salazar Gonzalez, Carla. 2019. "The Consequences of a Punitive Legal Process for Central American Women Seeking Asylum in the US." Presented at UCLA Research Group, University of California Los Angeles, 16 October.

Singer, Audrey. 2019. *Immigration: Alternatives to Detention (ATD) Programs*. Washington, DC: Congressional Research Service.

Slack, Jeremy, Daniel E. Martínez, Scott Whiteford, and Emily Peiffer. 2015. "In Harm's Way: Family Separation, Immigration Enforcement Programs and Security on the US-Mexico Border." *J. on Migration and Human Security* 3: 109-28.

Sutton, Rebecca and Darshan Vigneswaran. 2011. "A Kafkaesque State: Deportation and Detention in South Africa." *Citizenship Studies* 15: 627-42.

Toma, Kristine. 2017. "Providing A Solution for Immigrant Detainees Held Under The Mandatory Detention Statute." *J. National Association of Administrative Law Judiciary* 37: 858.

Transactional Records Access Clearinghouse (TRAC), 2017. "Use of ICE Detainers Obama vs. Trump." Available at: https://trac.syr.edu/immigration/reports/479/ (accessed 08 February 2020).

——— 2018. "Latest Data: Immigration and Customs Enforcement Removals." Available at: https://trac.syr.edu/phptools/immigration/remove/ (accessed 08 February 2020).

Turnbull, Sarah. 2016. "'Stuck in The Middle': Waiting and Uncertainty in Immigration Detention." *Time and Society* 25: 61-79.
Turner, Victor. 1967. *The Forest of Symbols: Aspects of Ndembu Ritual*. Ithaca: Cornell University Press.
Turney, Kristin. 2015. "Liminal Men: Incarceration and Relationship Dissolution." *Social Problems* 62: 499-528.
Van Gennep, Arnold. 1960. *The Rites of Passage*. Chicago: University of Chicago Press.
Zayas, Luis H. 2015. *Forgotten Citizens: Deportation, Children, and the Making of American Exiles and Orphans*. New York: Oxford University Press.

Cases Cited

Jennings v. Rodriguez, 583 U.S. ____ (2018).

Statuses and Regulations Cited

Immigration and Nationality Act, 8 U.S.C. §§ 1226(a) (2012).

Mirian G. Martinez-Aranda *is an NSF fellow and Ph.D. candidate in the Department of Sociology at the University of California Los Angeles. Her research primarily focuses on the intersection of immigration detention, criminalization, racism, and mass incarceration.*

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