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# trump administration to enforce registration, address requirements

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The Trump administration is signaling its intent to more rigorously enforce certain provisions of the Immigration and Nationality Act which, although they have been in existence for quite some time, have not previously been as strictly enforced.

On February 25, 2025, the Department of Homeland Security announced that it will require foreign nationals to:

- Notify the federal government of their change of address.
- Register with the federal government.
  - Many foreign nationals are considered to have already registered by virtue of being issued an I-94, green card, or work authorization. However, many other foreign nationals, including those who entered without inspection, will be required to affirmatively register using a MyUSCIS account.
  - **Notably, foreign nationals, whether previously registered or not, who turn 14 years old in the United States are required to re-register.** As written, this means that even foreign national children who entered the United States with a visa (such as F-2, H-4, L-2, and O-3 dependent children) and who were under 14 at the time of entry will need register within 30 days of turning 14. It would also affect immigrants (green card holders) who acquired their lawful permanent residence under age 14 and subsequently turn 14 years old. We expect the Department of Homeland Security to issue further guidance on this point.

(See Department of Homeland Security, "Secretary Noem Announces Agency Will Enforce Laws That Penalize Aliens in the Country Illegally" (February 25, 2025) (<https://www.dhs.gov/news/2025/02/25/secretary-noem-announces-agency-will-enforce-laws-penalize-aliens-country-illegally>)). These

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requirements have historically not been an enforcement priority.

Similarly, on February 5, 2025, the Department of Justice issued a memorandum directing prosecutors to pursue charges related to criminal immigration-related violations. (See Office of the Attorney General, Memorandum for All Department Employees, "General Policy Regarding Charging, Plea Negotiations, and Sentencing" (February 5, 2025) (<https://www.justice.gov/ag/media/1388541/dl?inline>)). Among other pronouncements, the memorandum references requirements that all foreign nationals notify the federal government of a change of address, as well as register with the federal government. The memorandum is unprecedented in that it redirects the full energy of the Department of Justice to punish immigration-status based offenses through criminal prosecution. This intended use of available criminal statutes to support its immigration and removal initiatives marks a significant departure from past practices, as few of these offenses have ever been routinely charged in federal courts.

While the recentness of these actions means we have not yet seen prosecutions for failing to provide notice of change of address or failing to register when required, the fact that the Department of Homeland Security and the Department of Justice have both issued statements regarding their intent to use criminal penalties to enforce these sections, makes clear that they will now be an immigration enforcement priority.

### Change of Address

All foreign nationals, *including permanent residents and those in nonimmigrant status*, must notify the federal government of a change of address within 10 days of moving.

Foreign nationals can submit a change of address through their United States Citizenship and Immigration Services ("USCIS") online account, which can be accessed at <https://www.uscis.gov/addresschange>. Alternatively, foreign nationals may mail Form AR-11 to USCIS, which is available at <https://www.uscis.gov/ar-11>. We recommend retaining proof of filing, including the filing receipt or confirmation page, along with a copy of the change of address form.

### Alien Registration

Beginning April 11, 2025, Foreign nationals 14 years of age or older who were not fingerprinted or registered when applying for a U.S. visa and who remain in the United States for 30 days or longer must apply for registration and fingerprinting. Similarly, parents and guardians must ensure that their children below the age of 14 are registered.

Many foreign nationals who are present in the United States are already 'registered' in that they were inspected and admitted to the United States, have applied for a benefit after entering the United States, or have been placed in removal proceedings. Foreign nationals who are already compliant and registered include the following:

- Green card holders (lawful permanent residents);
- Foreign nationals who were granted parole, including advance parole (even if that parole has expired);



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- Foreign nationals who came to the U.S. on a nonimmigrant or immigrant visa (even if it has expired);
- Foreign nationals issued an I-94;
- Foreign nationals who are already in immigration court (removal) proceedings;
- Foreign nationals granted employment authorization on any basis (even if it has expired);
- Refugees;
- Foreign nationals who applied for lawful permanent residence (even if the application was denied); and
- Foreign nationals who have border crossing cards or entered the U.S. as a crewman.

Foreign nationals who *have not* registered include:

- Foreign nationals who are present in the United States without inspection and admission, or inspection and parole;
- Canadian visitors who entered the United States at land ports of entry, were not issued an I-94, and who remain in the United States for 30 days or longer; and
- Foreign nationals who are present in the United States under a humanitarian program, including Deferred Action for Childhood Arrivals (DACA), temporary protected status (TPS), and asylum, and have not been issued an employment authorization document (EAD) or other proof of registration.

To register, foreign nationals must create a USCIS online account at <https://my.uscis.gov/>. Foreign nationals will then be able to access and complete Form G-325R, Biographic Information within their online account. Each foreign national submitting Form G-325R must have their own individual USCIS online account; this includes children. Once a foreign national has registered and appeared for fingerprinting (unless waived), USCIS will issue evidence of registration, which foreign nationals over the age of 18 must carry and keep in their personal possession at all times.