

Nos. 24A884, 24A885, 24A886
IN THE SUPREME COURT OF THE UNITED STATES

DONALD J. TRUMP, ET AL.,
Applicants,

v.

CASA, INC., ET AL.,
Respondents,

DONALD J. TRUMP, ET AL.,
Applicants,

v.

STATE OF WASHINGTON, ET AL.,
Respondents,

DONALD J. TRUMP, ET AL.,
Applicants,

v.

STATE OF NEW JERSEY, ET AL.,
Respondents.

On Applications for Partial Stays of the Injunctions Issued by the
United States District Courts for the District of Maryland,
the Western District of Washington, and the District of Massachusetts

**BRIEF OF *AMICI CURIAE* LOCAL GOVERNMENTS AND LOCAL
GOVERNMENT OFFICIALS IN SUPPORT OF RESPONDENTS**

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STATEMENT OF INTEREST

Amici are local governments and local government officials from across the nation representing one hundred and seven jurisdictions in twenty-four states.¹ *Amici* write in furtherance of their shared interest in protecting the health and welfare of their residents and the cohesion of their communities. Children who would be deprived of citizenship under President Trump’s Executive Order “Protecting the Meaning and Value of American Citizenship” (“Citizenship Stripping Order” or “Order”) are valued members of *amici*’s communities. Children born on our soil attend our schools. When they are sick, they obtain services through local health care providers. Local hospitals register the births of children born in our localities, and local administrators determine their eligibility for public benefits. When these children grow older, they are our frontline workers, medical providers, and law enforcement personnel. They start businesses, teach schoolchildren, and contribute to our local and national economies. And when they have their own children, they pass American values on to the next generation.

If the Order goes into effect, even in part, while these cases are pending, children born in many of *amici*’s jurisdictions will face immediate irreparable harm.

¹ Pursuant to Supreme Court Rule 37.6, no party or party’s counsel authored this brief in whole or in part. No party or party’s counsel contributed money intended to fund preparation or submission of this brief. No person other than *amici curiae* or its counsel made a monetary contribution to its preparation or submission. A list of all *amici* is provided at Appendix A.

Many would not be covered by the narrower injunctions sought by the federal government. Children stripped of citizenship will be excluded from crucial public benefits, undermining their ability to thrive. *Amici* themselves will also be harmed, as local governments will be on the frontlines of confronting the downstream results, including spikes in poverty, disease, and crime. *Amici* will also be charged with adapting local processes for determining benefits eligibility and issuing birth certificates to conform with the Order.

SUMMARY OF ARGUMENT

The federal government has not met its burden of satisfying any, let alone all, of the well-established conditions required to grant a stay. *Amici* write separately to emphasize the strong public interest in maintaining nationwide injunctions against implementation of the Order. If this Court grants partial stays, immediate and dire consequences will be felt across the nation.

The Citizenship Stripping Order would restrict *amici's* residents from fully participating in the community. Infants who, but for the Order, would be U.S. citizens will become ineligible for federally funded benefits programs, including nutrition assistance and health care, putting their health and safety at risk. They will grow up under the specter of deportation and be subjected to stigma and discrimination, undermining their sense of belonging. If implemented, the Order will undercut the social fabric and cohesion of communities by creating a permanent underclass of people with unequal rights. Denying citizenship to the children of lawful immigrants

will also hamper our universities' and businesses' efforts to recruit and retain international talent, stunting economic growth and innovation. The Order will affect not only the targeted children but will also jeopardize access to public benefits and identification documents for *citizen* children, because a U.S. birth certificate will no longer serve as proof of citizenship.

The broad harm to local economies, education rates, and public health outcomes will be immediate and irreversible. Even if courts ultimately hold the Order unconstitutional, stripping those born on U.S. soil of citizenship while litigation is ongoing will cause, for example, children to miss critical early-childhood vaccinations and families to be denied income support necessary to keep them safely housed. Moreover, state and local governments charged with issuing birth certificates and determining their residents' eligibility for federally funded benefits will face administrative upheaval, and they will likely have to promptly invest significant resources to overhaul administrative processes.

These harms will undeniably be felt in every corner of the nation, warranting the maintenance of nationwide injunctive relief. Furthermore, federal courts have consistently pronounced the need for national uniformity in immigration law. To allow citizenship to depend on the happenstance of which side of a state border a child is born would flout this well-established principle. For these reasons, *amici* join respondents in these consolidated cases in respectfully requesting that this Court

deny the federal government’s applications for a stay and maintain the nationwide relief issued by the district courts.

ARGUMENT

I. THE PUBLIC INTEREST WEIGHS STRONGLY IN FAVOR OF NATIONWIDE INJUNCTIVE RELIEF

As the respondents ably argue in their oppositions, the federal government has failed to satisfy *any* of the primary requirements for a stay. It is not a close case, and this Court’s inquiry can end there. Even if the other conditions were met, however, the Court must also consider “where the public interest lies” in ruling on a stay application. *Ohio v. Env’t Prot. Agency*, 603 U.S. 279, 291 (2024) (citing *Nken v. Holder*, 556 U.S. 418, 434 (2009)); *see also Trump v. Int’l Refugee Assistance Project (“IRAP”)*, 582 U.S. 571, 580 (2017) (“Before issuing a stay, ‘[i]t is ultimately necessary . . . to balance the equities—to explore the relative harms to applicant and respondent, as well as the interests of the public at large.’”) (quoting *Barnes v. E-Sys., Inc. Grp. Hosp. Med. & Surgical Ins. Plan*, 501 U.S. 1301, 1305 (1991)). The federal government’s attempt to brush aside evidence about the uncontroverted effects the Order would have on the public ignores this binding precedent.

The public interest is not only relevant as an independent stay factor. It also bears on the federal government’s likelihood of success on their argument that the district courts abused their discretion in granting nationwide injunctive relief. “Crafting a preliminary injunction is an exercise of discretion and judgment, often

dependent as much on the equities of a given case as the substance of the legal issues it presents.” *IRAP*, 582 U.S. at 579.

The interests of the public in this case weigh definitively in favor of maintaining nationwide injunctive relief while the merits are being litigated. Not only is enforcement of an unconstitutional order contrary to the public interest as a general rule, but the consequences of the Citizenship Stripping Order going into effect, even temporarily, will be severe and widespread.

A. Enforcement of an Unconstitutional Order Is Contrary to the Public Interest

As multiple circuit courts have recognized, “enforcement of an unconstitutional law is always contrary to the public interest.” *Karem v. Trump*, 960 F.3d 656, 668 (D.C. Cir. 2020) (quoting *Gordon v. Holder*, 721 F.3d 638, 653 (D.C. Cir. 2013)); *accord Schrader v. Dist. Att’y of York Cnty.*, 74 F.4th 120, 128 (3d Cir. 2023) (“[T]he enforcement of an unconstitutional law vindicates no public interest.”) (quoting *K.A. ex rel. Ayers v. Pocono Mountain Sch. Dist.*, 710 F.3d 99, 114 (3d Cir. 2013)); *Index Newspapers LLC v. United States Marshals Serv.*, 977 F.3d 817, 838 (9th Cir. 2020) (“It is always in the public interest to prevent the violation of a party’s constitutional rights.”) (quoting *Padilla v. Immigr. & Customs Enf’t*, 953 F.3d 1134, 1147 (9th Cir. 2020), *cert. granted, judgment vacated*, 141 S. Ct. 1041 (2021)). Under this principle, the public interest weighs against staying the district court injunctions, as the Order plainly violates the Fourteenth Amendment as interpreted by this Court in *United States v. Wong Kim Ark*, 169 U.S. 649 (1898).

B. Citizenship Stripping Will Reduce Resident Eligibility for Critical Public Services, Threatening Public Health and Increasing Poverty

The interests of the public additionally disfavor granting a stay because any implementation of the Order would strip children of eligibility for essential public benefits, leading to rippling harms in *amici*'s communities.

1. The Order Will Deny Citizenship to a Large Number of *Amici*'s Residents

The broad scope of the Order must first be emphasized to frame the grave impacts that will be felt across the nation if the injunctions are stayed in any part. Though political rhetoric surrounding President Trump's issuance of the Order has focused on children born to newly arrived, undocumented parents, the Order applies much more broadly. It excludes from citizenship children born in the United States to any mother whose presence is "lawful but temporary," if their fathers are also not citizens or legal permanent residents. *See* Exec. Order No. 14160, § 1, 90 Fed. Reg. 8449 (Jan. 20, 2025). The Order thus denies citizenship to children whose parents hold long-term work and student visas. Many of these visa holders have lived in the United States for years and are on a pathway to permanent residency.²

The Order is ambiguous as to its broader application, as there are other

² For example, H1-B specialized occupation visas are initially valid for three years and extendable to six years, and H1-B visa holders can apply for legal permanent residency. *See* United States Citizenship and Immigration Services, *H-1B Specialty Occupations*, <https://www.uscis.gov/working-in-the-united-states/h-1b-specialty-occupations> (last visited Apr. 28, 2025).

statuses that could also be considered “lawful but temporary.”³ It thus potentially also denies citizenship to children born to Deferred Action for Childhood Arrivals (DACA) recipients who, by definition, themselves came to the United States as young children and have resided here continuously since. The Order may likewise apply to children of residents who have been granted asylum or are awaiting an asylum determination, and to refugees, all of whom may apply for legal permanent residency after being in the United States for one year. *See* 8 U.S.C. §§ 1159(a),(b).

Overall, the record in this case shows that more than 150,000 children born to undocumented parents alone will be rendered ineligible for citizenship under the Order each year. Case No. 24A885, App. 50a. The total number will be higher, as this estimate excludes children born to immigrants with temporary legal status. *See id.* 205a. The substantial number of children that would be affected by the Order is especially salient because neither the Order nor current federal immigration law provide any alternative legal immigration status to a child denied birthright citizenship. If this Court grants the government’s requested stay, the immediate effect will be that children denied citizenship under the Order would lack legal immigration status in the United States upon birth.

³ The Order describes “lawful but temporary” status as including persons “such as, *but not limited to*, [those] visiting the United States under the auspices of the Visa Waiver Program or visiting on a student, work, or tourist visa.” *See* 90 Fed. Reg. at 8449 (emphasis added).

2. Citizenship Stripping Will Result in Lost Access to Social Safety Nets for Children, Causing Severe Ripple Effects

In denying citizenship to thousands of children born in the United States, the Order will render those children ineligible for essential public benefits. Doing so will severely impact public health and community well-being both in the short and long terms. Numerous federally funded public benefits programs targeted at low-income families are available only to citizens and to limited categories of “qualified” resident aliens. *See* 8 U.S.C. §§ 1611(a) (“an alien who is not a qualified alien . . . is not eligible for any Federal public benefit”), (c)(1)(B) (defining “Federal public benefit” as “any retirement, welfare, health, disability, public or assisted housing, postsecondary education, food assistance, unemployment benefit, or any other similar benefit”). While lawful permanent residents, refugees, and asylum recipients are “qualified” immigrants for the purpose of these benefits, work and student visa holders are not. 8 U.S.C. § 1641(b). Nor are individuals who lack any legal status. *Id.*

Overall, federally funded public benefits help keep tens of millions of families out of poverty nationwide.⁴ By denying children birthright citizenship and rendering them ineligible for federal public assistance, the Order will increase hunger, poverty, and preventable disease across the nation. Even families with citizen children will face significant barriers to accessing the public benefits that they *are* eligible for

⁴ John Creamer, United States Census Bureau, *Government Assistance Lifts 45.4 Million Out of Poverty in 2021* (Sept. 13, 2022), <https://www.census.gov/library/stories/2022/09/government-assistance-lifts-millions-out-of-poverty.html>.

because, as discussed below, *infra*, Part I.E, regularly issued birth certificates will no longer suffice to demonstrate citizenship.

**i. Citizenship Stripping Will Result in Increased
Public Health Threats Due to Declines in Insurance
Rates and Access to Health Care**

Children denied citizenship under the Order will have very limited health insurance options because of their exclusion from federal benefits. They will be unable to receive subsidized insurance through Medicaid or the Children's Health Insurance Program (CHIP). *See* 8 U.S.C. § 1611(a); 42 C.F.R. § 435.406 (Medicaid); 42 C.F.R. § 457.320(d) (CHIP). They will also be ineligible to enroll in private insurance through health insurance marketplaces. *See* 42 U.S.C. § 18032(f)(3).

Some states have elected to extend subsidized insurance coverage under state programs to individuals whose immigration status bars them from federally funded benefits. *See, e.g.,* CAL. WELF & INST. CODE § 14007.8 (expanding California's Medicaid coverage to all children and adults regardless of immigration status); *see also* 8 U.S.C. § 1621 (providing that non-qualified immigrants are not eligible for state and local public benefits unless a state otherwise provides). These states, however, are in the minority: only thirteen states provide medical insurance coverage to all children irrespective of immigration status, and only seven states provide any form of subsidized health care to adults who are ineligible for federal Medicaid because of

immigration status.⁵ The limited options for health insurance for immigrants without legal status is reflected in insurance coverage rates: in 2023, 50% of undocumented immigrants and 18% of lawfully present immigrants were uninsured, compared to only 8% of U.S.-born citizens and 6% of naturalized citizens.⁶

Children who lack health insurance are much less likely to receive preventative care, including vaccinations, health screenings, and wellness visits, making them more vulnerable to preventable diseases.⁷ A decline in preventative health care at the individual level increases public health risks in a community. Obtaining high vaccination rates, for example, is essential to prevent the spread of communicable diseases among children. Yet uninsured children are less likely to receive vaccines than their insured peers. A recent study found uninsured children to be 9.2% to 37.8% less likely to receive vaccines, varying by vaccine type, and 3.3% of the uninsured children in the study had received *no* vaccinations.⁸ Any increase in the rate of unvaccinated children would increase the risks of disease spread and even

⁵ National Immigration Law Center, *Health Care Coverage (Maps)*, <https://www.nilc.org/resources/healthcoveragemaps/> (last updated Feb.18, 2025).

⁶ Kaiser Family Foundation, *Key Facts on Health Coverage of Immigrants* (Jan. 15, 2025), <https://www.kff.org/racial-equity-and-health-policy/fact-sheet/key-facts-on-health-coverage-of-immigrants/>.

⁷ Paul J. Chung et al., *Preventive care for children in the United States: quality and barriers*, 27 Ann. Rev. Public Health 491, 491-515 (2006).

⁸ Holly A. Hill et al., *Vaccination Coverage by Age 24 Months Among Children Born in 2017 and 2018 - National Immunization Survey-Child, United States, 2018-2020*, 70 Morb. Mortal. Wkly Rep., 1435, 1435-1440 (2021).

death from preventable childhood illnesses. Preventative health care also reduces hospitalizations and emergency department use, thus saving health care providers and the government money.⁹

Additionally, the Order will likely have a chilling effect on health care access for families with non-citizen children that *do* have health insurance because of increased fear of immigration enforcement. The Trump administration's prioritization of mass deportation has already led immigrant families to avoid even necessary outings,¹⁰ and with federal immigration enforcement officials newly permitted to detain patients in sensitive areas, including hospitals,¹¹ families whose children are denied citizenship at birth may choose to avoid any non-emergency healthcare.¹² The impact on health care access would likely be most acute in states

⁹ See, e.g., Mark D. Piehl et al., *Narrowing the gap: decreasing emergency department use by children enrolled in the Medicaid program by improving access to primary care*, 154 Archives Pediatrics Adolescent Med. 791, 791-95 (2000).

¹⁰ Rebecca Davis O'Brien & Miriam Jordan, *A Chill Sets in for Undocumented Workers, and Those Who Hire Them*, N.Y. Times (Mar. 10, 2025), <https://www.nytimes.com/2025/03/09/business/economy/immigrant-workers-deportation-fears.html>.

¹¹ Department of Homeland Security, *Statement from DHS Spokesperson on Directives Expanding Law Enforcement and Ending Abuse of Humanitarian Parole* (Jan. 21, 2025), <https://www.dhs.gov/news/2025/01/21/statement-dhs-spokesperson-directives-expanding-law-enforcement-and-ending-abuse>.

¹² For example, a 2004 study found increased immigration enforcement caused expectant mothers to seek prenatal care later and less frequently. See Romina Tome et al., *Heightened immigration enforcement impacts US citizens' birth outcomes: Evidence from early ICE interventions in North Carolina*, 16 PLoS ONE (Feb. 3, 2021), <https://pmc.ncbi.nlm.nih.gov/articles/PMC7857575/>.

like Texas, which since 2024 requires public hospitals to collect and report patient data on immigration status.¹³ Overall, any stay of the district courts' injunctions will have the predictable effect of jeopardizing access to health care for some of our nation's most vulnerable residents.

ii. Citizenship Stripping Will Increase Hunger and Threaten School Performance by Limiting the Reach of Childhood Nutrition Programs

If allowed to go into effect, the Order will further undermine public health by reducing the number of families eligible for federal nutrition assistance benefits through the Supplemental Nutrition Assistance Program (SNAP) program. SNAP is considered “the nation’s most important anti-hunger program.”¹⁴ An average of 41 million people received benefits through SNAP each month in 2024.¹⁵ Proper early-life nutrition is essential for young children and adults to thrive. SNAP benefits improve school performance: they are correlated with higher test scores and fewer disciplinary issues.¹⁶ SNAP also has lifelong impacts: adults who received SNAP

¹³ See Office of the Texas Governor, *Governor Abbott Issues Executive Order Requiring Texas Hospitals to Collect, Report Healthcare Costs for Illegal Immigrants* (Aug. 8, 2024), <https://gov.texas.gov/news/post/governor-abbott-issues-executive-order-requiring-texas-hospitals-to-collect-report-healthcare-costs-for-illegal-immigrants>.

¹⁴ Center on Budget and Policy Priorities, *Policy Basics: The Supplemental Nutrition Assistance Program (SNAP)* (Nov. 24, 2025), <https://www.cbpp.org/research/food-assistance/the-supplemental-nutrition-assistance-program-snap>.

¹⁵ *Id.*

¹⁶ Anna Gassman-Pines & Laura Bellows, *Food Instability and Academic Achievement: A Quasi-Experiment Using SNAP Benefit Timing*, 55 Am. Educ. Rsch. J., 897, 897-927 (2018); Lisa A. Gennetian et al., *Supplemental nutrition assistance*

benefits as children have a lower risk of heart disease and obesity.¹⁷ Critically, SNAP benefits are available to mixed-status families containing citizen children and non-citizen parents. *See* 7 C.F.R. § 273.11(c)(3) (eligibility determined for each household member). In these cases, stripping children of citizenship means parents will lose support for their children's nutritional needs, increasing the family's overall financial burden.

iii. Federal Funding for Schooling-Related Services and Foster Care Will Decrease

Access to certain schooling-related and foster care services that are administered at the local level will also be impacted by the Order. Federal law requires school districts to provide services to students with disabilities under the Individuals with Disabilities in Education Act and partially reimburses districts for providing those services to citizens and qualified immigrants. *See* 34 C.F.R. § 300.154(d) (federal reimbursement under IDEA based on Medicaid eligibility). Under the Order, school districts would lose this funding for impacted students. Additionally, policies hostile to immigrants deter parents from sending their children

program (SNAP) benefit cycles and student disciplinary infractions, 90 Social Service Rev., 403, 403-433 (2016).

¹⁷ Steven Carlson, Center on Budget and Policy Priorities, *SNAP is Linked with Improved Health Outcomes and Lower Health Care Costs* (Dec. 14, 2022), <https://www.cbpp.org/research/food-assistance/snap-is-linked-with-improved-health-outcomes-and-lower-health-care-costs>.

to school due to fear of deportation or other concern for their families.¹⁸ When that happens, schools lose attendance-based federal funding.

Similarly, many *amici* localities administer foster care programs that rely on federal Title IV-E funds that are only available for citizen and “qualified alien” children. *See* 8 U.S.C. § 1641. Reduced funding for these foster care programs would limit their effectiveness and the number of children they can serve. In both the schooling and foster care contexts, localities will have to bear the full financial burden of program operations if they are to continue to provide life-altering services to all children that need them.

iv. The Order Will Strain Local and County Safety-Net Services

Inevitably it will be states, cities, and counties that must deal with the on-the-ground consequences of reduced federally funded health and welfare benefits for children and families. In our federal system, counties and cities provide safety-net services to uninsured, low-income, and vulnerable populations. County governments generally run public hospitals, community health centers, and free health clinics. Cities, counties, and states collaborate to provide homelessness services. Local education departments provide resources to high-needs students in schools. And law

¹⁸ A 2017-18 national survey of educators found a 58% increase in absenteeism associated with increased immigration enforcement. *See* Patricia Gándara et al., *The Impact of a Broken Immigration System on U.S. Students and Schools*, Latino Policy & Politics Institute, Univ. of Cal., Los Angeles (2023).

enforcement officials address public safety issues that rise in correlation with increases in poverty. *Amici* local governments do not have the resources to absorb the anticipated spike in demand for these services that would follow implementation of the Order. Upholding the district court’s injunction strongly serves the public interest because it will prevent a flood of demand, and an inevitable strain, on local safety-net services.

C. Citizen Stripping Will Strain Community Cohesion

In addition to impacting health, nutrition, and economic security, stripping U.S. born children of citizenship will also damage community cohesion and cause immense mental and social strain on affected families. To start, the Order creates the dire immediate possibility that a child born to lawfully present parents would be at risk of deportation. The resulting family separation would inevitably wreak untold havoc on families and communities. What’s more, children targeted by the Order who remain in the United States will be excluded from the “priceless benefits” of citizenship. *Schneiderman v. United States*, 320 U.S. 118, 122 (1943). Over forty years ago, this Court cautioned against the creation of “a permanent caste of undocumented resident aliens . . . denied the benefits that our society makes available to citizens and lawful residents.” *Plyler v. Doe*, 457 U.S. 202, 218–19 (1982). In unilaterally seeking to rewrite the Constitution, the Order would do exactly that. Children born as non-citizens will exist as an “underclass”—and denying them full participation in our communities will fray “the fabric of our society.” *Id.* at 219, 221.

Children denied citizenship that grow up in our communities will experience stigma and social exclusion, undermining their ability to integrate. Although these children will, like their citizen peers, go to local schools, learn to speak English, internalize U.S. values, and envision their futures here, they will at the same time be excluded from core aspects of American life, including voting and, in some states, getting drivers' licenses. Scholars have documented the severe negative impacts of social exclusion and discrimination on undocumented youth in the United States, including persistent feelings of fear, stress, and shame.¹⁹ These children will also face the threat of deportation, despite knowing no other home, the stress of which itself causes negative health outcomes.²⁰ When residents experience social isolation, exclusion, and constant stress, local governments are left to deal with the consequences, like poor educational outcomes, increased crime, and unemployment.

D. The Order Will Hamper Recruitment Efforts, Undermining Academic Excellence and Economic Growth

Not only will the Order have devastating impacts on children born to non-citizens, but it will also likely have the intended effect of deterring at least some

¹⁹ See, e.g., Jean C. Williams, *"It's Always with You, that You're Different": Undocumented Students and Social Exclusion*, 20 J. of Poverty, 168, 168–193 (2015); Roberto G. Gonzales et al., *No Place to Belong: Contextualizing Concepts of Mental Health Among Undocumented Immigrant Youth in the United States*, 57 Am. Behavioral Scientist, 1174, 1174-1199 (2013).

²⁰ See Airin Martinez, *Household fear of deportation in relation to chronic stressors and salivary proinflammatory cytokines in Mexican-origin families post-SB 1070*, 5 SSM Population Health 188, 188-200 (2018).

immigrants. The Order risks imposing a “brain drain” on localities that rely on international recruitment and retention to thrive. Any international applicant considering a job offer or an acceptance to a university in the United States may rightfully be wary of moving, even temporarily, to a country where their child would be denied benefits and potentially face harm. Local economies are bolstered by robust, competitive universities and corporations that recruit and produce great talent. According to the Brookings Institute: “The U.S. is grappling with growing labor shortages across various industries [...] [i]mmigrant labor plays a pivotal role, stabilizing our workforce and driving economic growth.”²¹ The Order would make it more difficult to address these needs in the labor market.

E. The Order Will Upend Established Practices of Using Birth Certificates to Demonstrate Citizenship

On a practical level, the Order will throw into disarray the administration of public benefits programs and the provision of identity documents and burden local governments with having to adopt new administrative systems. Over the last 150 years, federal, state, and local governments have built an administrative structure centered around the accepted fact that birth in the United States is a guarantee of citizenship.²² The U.S. has no federal birth registry or national identification

²¹ Brookings Institute, *Visa Outlook Explorer* <https://brookings-wof-immigration-8h3.pages.dev/> (last visited Apr. 29, 2025).

²² See generally Angela R. Remus, *Caught Between Sovereigns: Federal Agencies, States, and Birthright Citizens*, 34 Stan. L. & Pol’y Rev. 225 (2023).

document granted at birth. Instead, states and local governments (often county health departments and recorders, in coordination with state agencies) register local births and issue birth certificates. In most cases, these local administrators forward birth registry information for U.S. born citizens to federal agencies to generate social security numbers. *See* Case No. 24A885, App. 79a.

The administration of federally funded health and welfare benefits relies on locally issued birth certificates to demonstrate citizenship. *See, e.g.*, 7 C.F.R. § 273.2(f)(1)(vii) (birth certificates can prove identity for SNAP benefits, among other acceptable identity documents such as a driver's license); 42 U.S.C. § 1396b(x)(3)(C) (birth certificates can be submitted to prove Medicaid eligibility when documentary evidence of citizenship is required). Similarly, U.S. born citizens must also submit birth certificates when applying for a passport. 22 C.F.R. § 51.42. A birth certificate is also a primary form of evidence accepted to prove U.S. citizenship when applying for a Social Security card. 20 C.F.R. § 422.107(d).

Under current regulations, birth certificates submitted for federal purposes are not required to contain any information about the immigration status of a newborn child's parents. *See, e.g.*, 22 C.F.R. § 51.42(a) (specifying the information that must be included on a birth certificate submitted by a U.S. born passport applicant as proof of citizenship). Local agencies involved in registering births and issuing birth certificates thus have no reason to, and do not, collect information about parents' immigration status. *See, e.g.*, Case No. 24A885, App. 79a ("Washington birth

certificates do not collect parental immigration or citizenship status information.”); *id.* 156a (In Illinois “[c]urrently, it is not possible to determine a foreign-born parents’ immigration status from their child’s birth certificate” and “[h]ealthcare facilities do not routinely ask patients, including new parents, for their immigration status.”); *id.* 162a (same for Oregon).

Accordingly, if the Executive Order goes into effect, birth certificates as currently issued will no longer be adequate for demonstrating federal benefits eligibility or entitlement to federal identity documents. With respect to benefits administration, states and localities will be left to grapple with the administrative consequences, as the federal government delegates the administration of most federally funded public benefits programs to the states, which in turn delegate to counties in some cases.²³ States and local governments will struggle to administer benefits programs under the Order, having no immediate means of determining and demonstrating the U.S. citizenship of children born in their jurisdictions. Case No. 24A885, App. 75a.

The consequences will be two-fold. First, at least initially, benefits administrators will be *unable* to prove newborn residents’ eligibility for benefits

²³ For example, ten states delegate to counties responsibility for administering SNAP benefits, representing 34.3% of program participants. National Association of Counties, *Policy Brief: Supplemental Nutrition Assistance Program (SNAP) Reauthorization and Appropriations* (Feb. 13, 2025), <https://www.naco.org/resources/supplemental-nutrition-assistance-program-snap-reauthorization-and-appropriations>.

programs and eligible citizens may be denied essential benefits. Second, whatever new systems are established for determining eligibility, a substantial administrative burden will surely fall on states and local governments.²⁴ Local governments will likely need to develop new processes and procedures to comply with new federal rules. Although the Order provides no information about how citizenship will be confirmed for U.S. born children, it is plausible that the process for issuing a birth certificate itself will need to be overhauled. State and local agencies involved in newborn birth registration may be called upon to verify and substantiate information about parents' citizenship and/or immigration status. The burden of designing and implementing any such reforms, and dealing with pitfalls that inevitably emerge, will be immense. Whatever form the administrative changes take, they will require significant time and expense at every stage, including design, training, and implementation. The practical consequences of upending citizenship determinations will be felt without delay nationwide if the preliminary injunctions are stayed, starting with the first baby born on U.S. soil, whether to citizen parents or not. With nearly 10,000 children born each day in the United States, chaos will rapidly snowball.

²⁴ See generally Jacob Hamburger, *The Consequences of Ending Birthright Citizenship*, Wash. U. L. Rev. (forthcoming 2025), available at SSRN: <https://ssrn.com/abstract=5106022> (discussing the “bureaucratic consequences” of the Executive Order as related to the issuance of passports, social security numbers, and federal and state benefits).

F. Only Nationwide Relief Can Prevent These Widespread Harms

As is evident from these examples, the impacts of the Order on economic security, community stability, and public health will be felt not just by the parties to this litigation but in every corner of the country. Many of the jurisdictions represented in this coalition of local governments and officials are not located in states that would be covered by a partial injunction. Yet all of *amici*'s communities, across every state where they are located, will suffer greatly if the Order is allowed to go into effect. Absent nationwide relief, our jurisdictions may need to bring additional lawsuits, intervene in existing legal actions, or take other steps to ensure protection for our governments and our communities. That would be inefficient for our jurisdictions and the judiciary. The nationwide injunctions issued by the district courts are thus justified, as "the scope of injunctive relief is dictated by the extent of the violation established, not by the geographical extent of the plaintiff class." *Califano v. Yamasaki*, 442 U.S. 682, 702 (1979).

Moreover, anything less than nationwide injunctive relief in these consolidated cases will create perverse incentives resulting in compounded harms in some localities. The Order could incentivize expectant parents to relocate to jurisdictions where injunctions are in force, so that their children will be born as U.S. citizens. And, for parents unable to relocate before giving birth, there will still be an incentive to move to states that fund and provide public benefits to families whose non-citizen children are excluded from federal benefits. Such incentives will strain resources in

a subset of states. The nationwide character of the harm and the perverse incentives that a patchwork injunction would create both counsel against staying the injunctions to any extent.

II. NATIONWIDE RELIEF IS ESSENTIAL TO ENSURE UNIFORMITY IN CITIZENSHIP ELIGIBILITY

As *amici* have detailed, the harm to the public if the injunctions are stayed would extend across the nation. The district courts in these consolidated cases did not, therefore, abuse their discretion in awarding nationwide relief given the national character of the harm. Nationwide injunctive relief is additionally appropriate because these cases implicate the fundamental question of national significance of who gets to be a citizen of this country. If ever there was a case that required uniform application of injunctive relief across the nation, this is that case.

Federal courts have repeatedly recognized the need for uniformity in the application of immigration policy. As several circuit courts have explained, “the Constitution requires a *uniform* Rule of Naturalization; Congress has instructed that the immigration laws of the United States should be enforced vigorously and *uniformly*; and the Supreme Court has described immigration policy as a comprehensive and *unified* system.” *Texas v. United States*, 809 F.3d 134, 187–88 (5th Cir. 2015), *as revised* (Nov. 25, 2015) (emphasis in original) (internal quotations and citations omitted); *see also E. Bay Sanctuary Covenant v. Biden*, 993 F.3d 640, 681 (9th Cir. 2021); *Arizona v. United States*, 567 U.S. 387, 401 (2012) (holding

provisions of Arizona law governing immigration preempted because they undermined uniformity of federal immigration law).

Because of the paramount need for uniformity in immigration policy, federal courts have “consistently recognized the authority of district courts to enjoin unlawful [immigration] policies on a universal basis.” *E. Bay Sanctuary Covenant*, 993 F.3d at 681 (quoting *E. Bay Sanctuary Covenant v. Trump*, 932 F.3d 742, 779 (9th Cir. 2018)); *see also Hawaii v. Trump*, 878 F.3d 662, 701 (9th Cir. 2017) (“Because this case implicates immigration policy, a nationwide injunction was necessary to give Plaintiffs a full expression of their rights.”), *rev’d on other grounds and remanded*, 585 U.S. 667 (2018); *Washington v. Trump*, 847 F.3d 1151, 1166–67 (9th Cir. 2017) (“[A] fragmented immigration policy would run afoul of the constitutional and statutory requirement for uniform immigration law and policy.”) (citing *Texas*, 809 F.3d at 187–88). For example, the Fifth Circuit denied a motion to stay a nationwide preliminary injunction preventing implementation of policies that provided legal presence for immigrants who are parents of citizens or lawful permanent residents and expanded the DACA program. *Texas*, 809 F.3d at 188. This Court, in an evenly divided ruling, affirmed that decision. *United States v. Texas*, 579 U.S. 547, 548 (2016).

To the extent members of this Court have doubts about the propriety of nationwide injunctions as a general matter, this case is ill-suited to delve into those concerns. Blocking implementation of the Citizenship Stripping Order nationwide is

essential to maintain uniform rules governing citizenship and is consistent with over 100 years of precedent and practice. If the Order is enjoined in some states and as to some individuals, while being allowed to go into effect in other states and as to other individuals, the result would be a great variation in the availability of citizenship rights across state borders. If anything would be “jurisdictionally messy” it would be citizenship rules that change depending on where in the country a child is born or whether a family moves states. Such a result would be incoherent and fundamentally at odds with the guarantee of national citizenship provided in the Fourteenth Amendment.

CONCLUSION

President Trump’s Citizenship Stripping Order clearly violates the Fourteenth Amendment and threatens to unleash turmoil in *amici*’s communities, injuring countless children and families. For these reasons and for the reasons provided by respondents, *Amici* Local Governments and Government Officials respectfully request that this Court deny the federal government’s applications for partial stays of the injunctions in these consolidated cases.

Respectfully submitted,

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City of Austin, Texas

City of Baltimore, Maryland

City of Boston, Massachusetts

City of Chicago, Illinois

City of Columbus, Ohio

Dane County, Wisconsin

City and County of Denver, Colorado

City of Durham, North Carolina

El Paso County, Texas

City of Evanston, Illinois

Harris County, Texas

King County, Washington

City of Madison, Wisconsin

Marin County, California

City of Minneapolis, Minnesota

County of Monterey, California
Montgomery County, Maryland
City of New Haven, Connecticut
City of New York, New York
City of Northampton, Massachusetts
Pima County, Arizona
City of Pittsburgh, Pennsylvania
City of Portland, Oregon
City of Providence, Rhode Island
City of Sacramento, California
City of Saint Paul, Minnesota
City of San Diego, California
County of Santa Clara, California
City of Santa Fe, New Mexico
City of Santa Monica, California
City of Tucson, Arizona
City of West Hollywood, California

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Michael Chameides
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