



Bryan Cave Leighton Paisner

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Andrew Tauber  
Counsel  
Direct: +1 202 508 6111  
andrew.tauber@bclplaw.com

BRYAN CAVE LEIGHTON PAISNER LLP  
1155 F Street NW  
Washington DC 20004 1357  
T: +1 202 508 6000  
F: +1 202 508 6200  
bclplaw.com

Hon. Scott Harris  
Clerk  
Supreme Court of the United States  
Washington, D.C. 20543

Re: *Miot, et al. v. Trump, et al.*, No. 25-1084

Dear Mr. Harris:

Attached to this letter are three documents that were produced by the government in discovery in *National TPS Alliance v. Noem*, No. 3:25-cv-01766 (N.D. Cal.).<sup>1</sup> Each of the attached documents concerns Haiti's TPS termination and therefore bears on the *Miot* respondents' claims. These documents are among those that the *Miot* respondents would present to the district court were this case to proceed to final judgment. These documents undercut the Government's stated rationale for the termination. A brief description of each document is below.

- Bates No. NTPSA2\_009741 is an email from USCIS researcher Ashley Holland to Samantha Deshommès, Chief, Regulatory Coordination Division, USCIS Office of Policy and Strategy dated September 26, 2025. In it, Ms. Holland wrote, in relevant part, that her supervisor, "Paul," was "forcing" her "to include a section" in "the Haiti country considerations report" "on how TPS is a pull factor" for unlawful migration. Ms. Holland wrote that she "would be fine with including that, if we had any empirical evidence to support that claim, but the citations that have been included do not mention TPS at all as a pull factor (and are 3-4 years old)." Ms. Holland wrote that she was "obeying his command as [her] supervisor" but that she wanted to "go on record that [she was] concerned" about "making such claims without empirical support."
- Bates No. NTPSA2\_009164 is an email from USCIS employee Ofira Honig to Ashley Holland dated October 9, 2025. In it, Ms. Honig wrote, in relevant part, that "DHS data" show that "0.06%" of the "Haiti Temporary Protected Status population (including current beneficiaries and applicants with pending

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<sup>1</sup> Because discovery is ongoing, the *Miot* respondents expect these documents to be produced in *Miot* in the near term. The *Miot* respondents note that although the attached documents are marked "Confidential" the *Miot* respondents are nonetheless permitted by the terms of the applicable protective orders to disclose them here.

applications) had public safety records, and none were associated with Known or Suspected Terrorist records.”

- Bates No. NTPSA2\_\_009742 is an email from Ashley Holland to Samantha Deshommes dated October 23, 2025. In it, Ms. Holland wrote, in relevant part, that “there are no KST [Known or Suspected Terrorist] hits for Haiti” in the databases she searched. Accordingly, she wrote, “Paul removed that” from USCIS’s Haiti country conditions analysis “because he did not feel that a null result supported the termination argument.”

I would appreciate it if you could circulate this letter and the attached documents to the Members of the Court.

Sincerely,

Andrew E. Tauber  
*Counsel of Record, Miot v. Trump*

cc: See Attached Service List

D. John Sauer  
Solicitor General  
United States Department of Justice  
950 Pennsylvania Avenue NW  
Washington, DC 20530-0001  
(202) 514-2217  
SupremeCtBriefs@usdoj.gov

Ahilan T. Arulanantham  
Center for Immigration Law and  
Policy  
UCLA School of Law  
385 Charles E. Young Dr. East  
Los Angeles, CA 90095  
(323) 422-5947  
arulanantham@law.ucla.edu

Ghita Schwarz  
International Refugee Assistance  
Project  
One Battery Park Plaza, Floor 33  
New York, NY 10004  
(646) 939-9169  
gschwarz@refugeerights.org

**From:** Holland, Ashley M [REDACTED]  
**Sent:** Friday, September 26, 2025 10:49:22 AM  
**To:** Deshommes, Samantha L  
**Subject:**

Hi Sam, We are working on finalizing the Haiti country considerations report. Paul is forcing me to include a section on how TPS is a pull factor. I would be fine with including that, if we had any empirical evidence to support that claim, but the citations that have been included do not mention TPS at all as a pull factor (and are 3-4 years old). I am obeying his command as my supervisor, but I want to go on record that I am concerned that making such claims without empirical support is not our job and will open us - and the Haiti decision - up to litigation.

**From:** Honig, Ofira M [REDACTED]  
**Sent:** Thursday, October 9, 2025 8:40:44 AM  
**To:** Holland, Ashley M  
**Subject:**

DHS data also shows approximately 369 aliens (0.06%) of the Haiti Temporary Protected Status population (including current beneficiaries and applicants with pending applications) had public safety records, and none were associated with Known or Suspected Terrorist records[SD1] . [SD2] [AH3]

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**From:** Holland, Ashley M [REDACTED]  
**Sent:** Thursday, October 23, 2025 11:29:31 AM  
**To:** Deshommes, Samantha L  
**Subject:**

Hi Sam, thanks for granting access. I concur with Paul that you have addressed the only comment Rob Law left in Haiti attachment C, but I wanted to flag two things for you:

1. We were asked to provide a citation in the DM to specify a source for the data. That citation was this: USCIS Internal Data, Office of Policy and Strategy, TECS data, TPS Haiti as of Sept. 17, 2025. USCIS. This citation would be plugged in either before or after footnote #46. Would you like me to add that?
2. You can see that there are no KST hits for Haiti, so Paul removed that because he did not feel that a null result supported the termination argument. Should we remove KST hits going forward or are we only removing it for Haiti because it doesn't support the NS argument?