

Nos. 25-1083 & 25-1084

IN THE
Supreme Court of the United States

MARKWAYNE MULLIN, SECRETARY,
DEPARTMENT OF HOMELAND SECURITY, *et al.*,
Petitioners,

v.

DAHLIA DOE *et al.*,
Respondents.

DONALD J. TRUMP,
PRESIDENT OF THE UNITED STATES, *et al.*,
Petitioners,

v.

FRITZ EMMANUEL LESLY MIOT, *et al.*,
Respondents.

ON WRITS OF CERTIORARI TO THE UNITED STATES
COURTS OF APPEALS FOR THE D.C. AND SECOND CIRCUITS

BRIEF OF *AMICI CURIAE*
NATIONAL IMMIGRATION LAW CENTER
AND 26 NONPROFIT ORGANIZATIONS
IN SUPPORT OF RESPONDENTS

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INTEREST OF THE AMICI

The National Immigration Law Center (NILC) is a non-profit organization dedicated to advancing the rights and opportunities of low-income immigrants and their families. NILC works to ensure that immigrant communities have access to justice and are protected against unlawful practices and governmental overreach. NILC has a long history of advocating for immigrant protections and access to work authorization through litigation, policy work, and community education.

Twenty-six (26) nonprofit organizations serving immigrant communities across the country join NILC as *amici curiae*. These groups have a long history of supporting and advocating for TPS holders and their families through the legal system, social services, and community education and support. *Amici curiae* submit this brief to highlight the harms to 33 individual TPS holders if their countries' designations are terminated or whose designations have already been terminated. In addition to the devastating consequences for Haitian and Syrian TPS holders, *amici curiae* have included the stories of those from other countries facing termination and whose and livelihood hang in the balance of this Court's ruling.¹

1. Pursuant to Supreme Court Rule 37.6, *amici curiae* state that no counsel for a party authored this brief in whole or in part, and that no person or entity other than *amici curiae*, their members, or their counsel made a monetary contribution to the preparation or submission of this brief.

SUMMARY OF ARGUMENT

As of March 2025, there are approximately 1.3 million people from seventeen countries living in the United States with TPS.² Hundreds of thousands of U.S. citizen children have at least one parent who is a TPS holder, and hundreds of thousands of families include members with mixed immigration status.³

The TPS program promotes family unity, a core American value. Yet, TPS holders and their families are currently facing the imminent prospect of forced separation, economic devastation, and return to countries where many have legitimate fears for their safety. Mass termination of TPS would forcibly separate families—splitting married couples, parents and children, and other close family members who have built lives together in the United States over years and decades. It would also cause substantial, quantifiable economic harm to individuals, families, communities, and the nation as a whole. Hundreds of thousands of TPS holders from terminated designations would be forced to return to crisis-ridden countries that have remained—or in some cases become more—dangerous and unstable since their original TPS

2. Jill H. Wilson, Cong. Rsch. Serv., RS20844, *Temporary Protected Status and Deferred Enforced Departure* 8 (Aug. 28, 2025), <https://www.congress.gov/crs-product/RS20844>.

3. See FWD.us, *Temporary Protected Status Protects Families While Also Boosting the U.S. Economy* (Apr. 7, 2026), <https://www.fwd.us/news/temporary-protected-status-report-2025/>; First Focus on Child., *Fact Sheet: Temporary Protected Status (TPS)* (Jan. 31, 2023), <https://firstfocus.org/resource/temporary-protected-status/>.

designations.⁴ These harms cannot be undone after the fact.

Congress enacted the TPS statute as a humanitarian tool to provide refuge when conditions in a country make return unconscionable. *See* 8 U.S.C. § 1254a. The terminations challenged here abandon that purpose without adequate justification and without meaningful regard for human consequences, driven instead by the current administration’s mass detention and deportation agenda,⁵ which includes the strategic “de-documentation” of those who previously held lawful status.⁶ Indeed, the

4. In concert with its repeated attempts to terminate TPS designations, the administration has cut off access to other forms of immigration relief by pausing adjudications of asylum and other benefits, while creating additional barriers, banning visas for the majority of TPS countries, including Haiti and Syria. *See* U.S. Citizenship & Immigr. Servs., Policy Memorandum: *Hold and Review of USCIS Benefit Applications Filed by Aliens from Additional High Risk Countries* (Jan. 1, 2026); Proclamation No. 10998, *Restricting and Limiting the Entry of Foreign Nationals to Protect the Security of the United States*, 90 Fed. Reg. 59717 (Dec. 16, 2025); U.S. Citizenship & Immigr. Servs., Policy Memorandum: *Hold and Review of all Pending Asylum Applications and all USCIS Benefit Applications Filed by Aliens from High-Risk Countries* (Dec. 2, 2025); *see also* *Cath. Legal Immigr. Network, Inc. v. Rubio*, No. 1:26-cv-00858-JAV (S.D.N.Y. filed Feb. 2, 2026) (challenging consular visa issuance ban based on race, ethnicity, and national origin discrimination and other grounds).

5. Justo Robles & Etienne Côté-Paluck, *Thousands face deportation to danger as Trump targets temporary protections*, *The Guardian* (Aug. 22, 2025),

6. Jose Olivares, *How Trump is Undermining Legal Immigrants*, *The Guardian* (March 21, 2026), <http://theguardian>.

Government's decisions ignore the very harms the statute is designed to prevent; they cannot survive legal scrutiny.

Amici respectfully urge the Court to affirm the judgment of the courts below and to recognize the full scope of what is at stake for hundreds of thousands of people whose lives depend on the outcome of this case. This brief seeks to provide the Court with specific examples of the true harms that termination would have—or for countries where the terminations have already occurred, have had—on TPS holders and their families.⁷ The Court should carefully consider all these dimensions in evaluating the lawfulness of the government's termination decisions at issue here.

[com/us-news/2026/mar/21/trump-administration-legal-immigration](https://www.washingtonpost.com/us-news/2026/mar/21/trump-administration-legal-immigration).

7. The 33 stories below are of individual TPS holders who shared their stories either directly with amici curiae and undersigned counsel, and/or in legal filings in cases challenging TPS designations that are not currently before this Court. See *Nat'l TPS All. v. Noem*, No. 3:25-cv-01766-EMC (N.D. Cal.); *CASA v. Noem*, No. 8:25-cv-01484-TDC (D. Md.); *Doe v. Noem*, No. 1:25-cv-15483 (N.D. Ill.); *Nat'l TPS All. v. Noem*, No. 3:25-cv-05687-TLT (N.D. Cal.); *Afr. Cmty's. Together v. Noem*, No. 1:26-cv-11201-ADB (D. Mass.); *Doe v. Noem*, Case 1:26-cv-02280 (S.D.N.Y.). Interview notes are on file with counsel.

ARGUMENT

I. Haitian^{8,9} and Syrian¹⁰ TPS Holders Who Built American Lives Now Face Separation, Loss, and Danger

The consequences of the government’s TPS terminations are not abstract. They are playing out in real time, in communities across the country, and this Court’s ruling will impact whether hundreds of thousands more face the same fate. This is very visible in Haitian and Syrian communities, where families have built lives, careers, and roots over decades of lawful status, and where termination now threatens to sever those ties with devastating and irreversible effects.

K.E. is a TPS holder from Haiti. She has been in the U.S. since she was 15 years old. K.E. entered with her brother two months after an earthquake devastated

8. McConnell, Micaela, *Prolonged Limbo for Haitian TPS Holders: What Recent Court Decisions Mean*, Am. Imm. Council (Mar. 13, 2026), <https://www.americanimmigrationcouncil.org/blog/haiti-tps-what-recent-court-decisions-mean/> (“TPS was first designated for Haiti in 2010 immediately following a devastating 7.0-magnitude earthquake. Haiti has been re-designated for the last 16 years due to ongoing disasters and political uncertainty.”).

9. Press Release, Office of the High Commissioner for Human Rights, *Gangs expand reach in Haiti amid persistent deadly violence – UN Human Rights Office Report*, U.N. Press Release (Mar. 24, 2026), <https://www.ohchr.org/en/press-releases/2026/03/gangs-expand-reach-haiti-amid-persistent-deadly-violence-un-human-rights>.

10. Termination of the Designation of Syria for Temporary Protected Status, 90 Fed. Reg. 45398 (Sep. 22, 2025).

Haiti in 2010. Life in Haiti was not safe for K.E., before or after the earthquake—at a young age, she witnessed her neighbors being kidnapped and her parents being held at gunpoint simply for trying to drive her to school. After the earthquake, and before coming to the United States, K.E. was not able to leave her house because there were dead bodies in the streets and rampant looting was taking place. Sadly, not much has changed in Haiti since then.¹¹ Shortly after entering, K.E. and her brother became eligible for TPS and have been able to remain in the U.S. since that time. K.E. has since been able to complete high school and then go on to get a bachelor’s degree in architecture and urban planning and a master’s degree in urban planning. She currently works as a planner, designer and project manager for an architecture firm in Atlanta, Georgia. K.E. lives in the United States with her siblings, one of whom is a U.S. citizen, and another who is a legal permanent resident. K.E. and her family are from Port-au-Prince, which is completely controlled by gangs in this moment.¹² Returning to Haiti is not a viable option for her.

M.Z. is a Syrian TPS holder who has been present in the U.S. since 2012, the same year Syria was designated. He has a medical degree from Syria and is currently working in clinical research and health quality improvement at a hospital in the U.S., where he is responsible for building and monitoring strategies to improve the quality of care

11. Vibhu Mishra, *Haiti crisis at breaking point as gangs tighten grip ahead of transition deadline*, U.N. News (Jan. 21, 2026), <https://news.un.org/en/story/2026/01/1166806> (“Gangs continue to mount coordinated attacks, control key economic corridors and agricultural regions, and force mass displacement – stretching police and humanitarian capacity to the limit.”).

12. U.S. Dep’t of State, *Haiti Travel Advisory* (Jul. 15, 2025), <http://bit.ly/4efN3Pc> (last visited Apr. 8, 2026).

that the hospital provides. While in the U.S., M.S. cares for his 80-year-old U.S. citizen mother. Losing work authorization through TPS would mean M.S. could no longer afford to financially support his elderly mother. M.S. has also been waiting for an adjustment of status for more than seven years. Not having TPS would further delay M.S.'s adjustment of status, causing him devastating emotional hardship.

Like K.E., **M.J.** entered the U.S. immediately after the earthquake that shattered Haiti in 2010. During the earthquake, M.J. witnessed her two daughters tragically die as their house collapsed on top of them. M.J. herself was also buried underneath rubble for three days before being rescued. She sustained devastating injuries that required emergency care. M.J. had to be airlifted to a hospital in the U.S. where she received life-saving treatment. As a result of her injuries, both of her legs were amputated. In the U.S., M.J. continues to rely on ongoing prosthetic care, medical treatment and rehabilitation services that she could not receive in Haiti. Many years later, M.J. still suffers severe trauma symptoms stemming from the earthquake and the loss of her children—loud noises, vibrations and confined spaces trigger panic and emotional distress. However, M.J. finds comfort in the community she has here. She relies on her U.S. citizen family members, including her mother and siblings, and the life she has built around the continuity of medical care that allows her to function. Forcing M.J. to return to Haiti would place her at risk of physical deterioration, medical complications and further psychological harm.

T.T. is a 22-year-old Syrian TPS holder who entered the U.S. with his family when he was 11 years old. T.T.'s parents, once respected pharmacists in Syria, fled to the States to escape the persecution they were facing in their

home country and to provide T.T. and his younger brother a more promising future. T.T., recognizing the sacrifices his parents made, always prioritized his schooling as a way to pay them back—he graduated middle and high school with honors and in college he earned dean’s list recognition across multiple semesters. T.T. completed his undergraduate degree in Computer Science and is now pursuing a graduate degree in software engineering, all while maintaining a strong cumulative GPA. Losing TPS would strip T.T. and his family of their livelihood and the community they’ve built over the years. T.T. knows more English than Arabic, and more U.S. history than Syrian history. Moving back to Syria would force him to completely uproot his life to return to a country that is highly unstable and unsafe for long-term resettlement.^{13,14}

II. The Court’s Ruling Will Have Implications for TPS Holders from More Than a Dozen Countries—the Lives of Hundreds of Thousands Hang in the Balance

The Court’s decision in this case will not only impact Haitian and Syrian TPS communities; it will reverberate far beyond the people who are the immediate subject of

13. Doctors Without Borders, *What Does Syria Look Like a Year Since the Fall of Assad?* (Dec. 11, 2025), <https://www.doctorswithoutborders.org/latest/what-does-syria-look-year-fall-assad> (last visited Apr. 9, 2026). (“[T]he humanitarian crisis in Syria persists. Healthcare access is not reliable and the gap between humanitarian needs and the amount of funding available continues to grow. Millions of Syrians are still extremely vulnerable.”)

14. U.S. Dep’t of State, *Syria Travel Advisory* (Dec. 11, 2025), <https://bit.ly/3PQHEEr> (last visited Apr. 9, 2026).

this litigation. A ruling that permits the government to terminate TPS designations without meaningful judicial review would expose hundreds of thousands of long-settled residents to sudden deportation, shattering families and upending communities across the country. This Court should not allow such consequences without scrutiny.

a. Forced Family Separation

Following the termination of TPS designations for several countries, U.S. citizen children and mixed-status families have been or will be severely and irreparably harmed. These families face impossible scenarios, including whether those who are deported will bring their U.S. citizen children or family members to their home countries or be separated, sometimes permanently, or whether families should attempt to stay together while those who had TPS live in the shadows, under the fear of arrest, detention, and deportation.

P.C. came to the U.S. in 2008 at age 19. She had TPS since 2015 when Nepal was first designated. P.C. has lived with her husband, also a former TPS holder, in Florida since 2015, where she worked as a quality analyst engineer. In 2022, she left the workforce to take care of her U.S. citizen children—her daughter is 8 and her son is 5. P.C.’s son has autism, which requires specialized care and is another reason P.C. is not able to have a full-time job. Her son is non-verbal and completely relies on P.C. to communicate his needs. P.C.’s presence is crucial to her son’s well-being; she helps him express his emotions and needs and complete his daily routines. P.C.’s husband was working as a database administrator to support the family but has not been able to work or provide health

insurance for his loved ones since Nepal's TPS designation was terminated. P.C. is afraid of what would happen if she and her family were forced to return to Nepal. Her children have spent their entire lives in the U.S., and P.C. is especially concerned about being able to accommodate her son's special needs in Nepal, as many of the services he requires are extremely limited or entirely inaccessible in Nepal. And being separated from her children is a thought P.C. cannot bear.

D.T. is a Cameroonian who held TPS until it was terminated. He is the father of three children, two of whom are U.S. citizens. D.T.'s wife and one of his children were also TPS beneficiaries. The termination of TPS now threatens to tear D.T.'s family apart because he, his wife, and one of his children are at risk of removal. D.T. is afraid that forcibly returning to Cameroon would put both his life and the lives of his family members in danger. D.T. is deeply rooted in the United States and has proudly paid his taxes and has been an advocate for Cameroonians in the United States for many years. The termination of TPS puts this well-settled family at risk of danger and family separation.

H.D. is a Yemeni citizen who was granted TPS in December 2024. H.D. has two U.S. citizen children, ages 9 and 2, and TPS is the only thing keeping her from being deported and separated from her children. H.D. is also currently pregnant; she is due in a few weeks and is terrified that TPS for Yemen could end before she gives birth. The baby has a heart condition—H.D.'s doctors have already put her on notice that he will need specialized care immediately after birth. With her TPS status in limbo, it is unbearable knowing that the care

her unborn son needs is not available in Yemen. Forcing H.D. to return to Yemen could be fatal for her unborn child. Yemen's healthcare system has been systematically destroyed by years of war—hospitals have been bombed, clinics shuttered, and doctors driven from the country. Those who remain lack basic medicine, equipment, and reliable electricity. H.D. has no family or support network in Yemen; her entire family is in the United States, where they are U.S. citizens or lawful permanent residents. Her children are American, and this country is the only home they have ever known

M.D. is a TPS holder from Somalia and a soon-to-be-father. He is a teacher and mentor to his students, whom he supports beyond the classroom with transportation and meals. He also coaches soccer and wrestling. Losing TPS would mean not only losing his job, but his students losing their teacher, coach, and mentor. His students are at a fragile age where stability and community and support are critical to their academic and personal development. While M.D.'s students risk losing his guidance and mentorship, loss of his teaching job will have even more dire consequences for his pregnant wife, who relies on him for financial support and transportation to her prenatal appointments. Since both his work permit and his driver's license are based solely on his TPS status, he will lose his ability to work and his ability to drive, which he and his wife rely upon to meet their basic needs. The loss of **M.D.**'s income due to TPS cancellation would mean removal to Somalia, leaving behind his wife and unborn daughter.

M.S. is a Honduran woman who came to the United States as a child. She is a single mother of four U.S. citizen children whom she financially supports. Her five-year-

old son was diagnosed with autism; he received early childhood intervention and ABA therapy at home for one year, and now he is enrolled in a special school program designed for autistic children that combines speech and play therapies. Losing TPS has been very disruptive for her family. M.S.'s continued presence is vital to the well-being of her children because she's all they have to rely on for emotional and financial support.

b. Irreversible Medical Harm

U.S. citizen children and lawful permanent resident family members with serious medical conditions rely on their TPS holder family members not only to provide emotional and financial support, but for their very survival. The termination of TPS designations puts the lives of many vulnerable children and lawful permanent resident family members at risk because many of them need medical treatment that TPS holders can only provide if they have health insurance and the ability to work to afford that care. Additionally, some children with serious medical conditions simply cannot move to another country where treatment for their conditions is not readily available.¹⁵ Finally, in some cases the TPS holder himself is suffering from a medical condition he could not find treatment for in his home country.

M.M. is a 56-year-old man from Honduras who, prior to the termination of TPS for that country, had been a TPS holder since 1999. He is married and has four U.S.

15. See, e.g., Int'l Comm. of the Red Cross, *Haiti: making impossible choices in a health care system on the verge of collapse* (Oct. 23, 2025), <https://www.icrc.org/en/article/haiti-making-impossible-choices-health-care-system-verge-collapse>.

citizen children. The two younger children are 15-year-old twins, and one of them has suffered from a brain condition since birth that left him blind and unable to speak. While M.M.'s wife is a stay-at-home parent and primary caretaker of his special-needs son, M.M. was the breadwinner and worked as a commercial truck driver until his TPS was terminated. His job allowed him to support his family financially, provide healthcare, and pay for his special-needs son's medical expenses. M.M.'s son has faced unthinkable medical challenges, including undergoing more than twenty surgeries since birth and relying on a feeding tube. Since losing his TPS and job, M.M. has lived in constant worry about how he will provide for all his children's needs.

A.Q. is a 48-year-old Nicaraguan woman who was granted TPS in 1998. She lives with her elderly mother and younger brother who are both U.S. citizens. While A.Q.'s brother is 39 years old, he suffers from a rare genetic disorder which causes blindness and severe developmental and cognitive problems. A.Q. and her mother provide assistance with all her brother's daily tasks. A.Q. is already under significant stress because her job was at risk once the administration announced the TPS termination for Nicaragua. Her mother and brother's lives would be severely disrupted if she were returned to Nicaragua. A.Q. is the sole breadwinner of the family, and because she is only one who speaks English, she is the primary decision-maker for her family and the person who navigates her brother's medical needs. Her presence in the United States is crucial to maintaining her family's support structure.

J.M. is the father of three U.S. citizen children and a former TPS holder from Honduras. He entered the U.S. in 1988, at the age of 2, to seek treatment for meningitis

that he contracted as an infant. Due to his illness, J.M.'s hearing is permanently impaired. He is a member of the deaf community, and his first language is American Sign Language. J.M. worked as a forklift operator at National Tree Company for nearly 8 years before Honduras' TPS designation was terminated. He and his family relied on the income he earned at his job, as well as his employer-sponsored health insurance, to survive. J.M. now experiences significant distress and anxiety about his uncertain future. He is afraid of returning to Honduras, where he would be separated from his children and U.S. citizen partner, and not be able to communicate because he does not speak the language.

S.P. is a Nepalese woman who had TPS for ten years until it was terminated; her husband was also a TPS holder. The couple has a one-year-old U.S. citizen daughter who was born with esophageal atresia—a life-threatening condition where the esophagus and her stomach formed separately and were not connected—that requires extensive medical care and surgeries. The care the baby needs is not available in Nepal and relocating there would be detrimental for her health. While S.P. was planning a short visit to Nepal through advance parole, she consulted with doctors there about her daughter's condition and she was told that the hospitals there could not accommodate the baby's needs. The couple decided not to travel because they knew her daughter wouldn't be able to get the care she needs in Nepal. Their presence in the United States is indispensable due to their daughter's extensive and ongoing medical needs, for which adequate treatment is unavailable in Nepal.

C.P. is a Honduran man who has lived in the United States since 1998. C.P. is a single father to a 10-year-old U.S. citizen son who was born with a rare congenital heart

defect. At birth, doctors told C.P. that his son would not make it past the age of six. C.P.'s son's condition requires intensive monitoring, surgeries, and specialized care. Currently, C.P. is the only caregiver for his child because the child's mother, with whom C.P. shares custody, had emergency surgery and is in recovery for the foreseeable future. C.P.'s son relies on his father for his daily routine, and emotional and financial support. C.P. is very concerned about what will happen to his son if he is detained by immigration officials. C.P.'s worries have resulted in a lack of sleep, which he started taking medication for. Removing C.P. from the United States would have devastating consequences for his son.

H.R. is a 35-year-old woman from Honduras. She is the primary caregiver for her disabled U.S. citizen mother, who suffers from chronic, debilitating medical conditions and suffered a stroke in 2025. H.R. fears what will happen to her mother if she is detained or deported as her mother relies on her to manage her daily routine and drive her to all her medical appointments. The impact of H.R.'s absence on her mother's life cannot be overstated.

J.K is a Cameroonian TPS holder. She fled Cameroon two decades ago during the country's civil war, where she was targeted by both sides for having one Anglophone and one Francophone parent. She is a senior citizen and grandmother but still supports herself as a home health worker. J.K. suffers from numerous health issues, including circulatory issues, diabetes, pterygium (which affects her eyesight), and frequent bouts of pneumonia, which can be life-threatening. Loss of work authorization would jeopardize her access to essential medical care. Returning to Cameroon would put her at grave risk both because of her ethnicity and her health conditions.

c. Economic Destabilization

The loss of employment authorization will cause cascading harms on all TPS holders, their families, and their communities. They provide essential work throughout the country and across industries and sectors, including healthcare, education, construction and more.¹⁶ In certain states, their labor makes up a significant proportion of the workforce.¹⁷ Thus, the abrupt termination of the ability to work lawfully will be catastrophic not only for individual TPS holders and their families, but will impact both the economies and communities to which they have become integral and valued members.

N.D. is from Haiti and has held TPS since 2011. She graduated from college in the U.S. and has been employed ever since. Over years of hard work, she was able to buy a home and car. She is married to a U.S. citizen and has been trying to adjust her status. Her husband is a teacher and they cannot make ends meet only on his salary. She is also expecting her first child and relies on her health insurance for prenatal appointments. She risks losing

16. Penn Wharton Budget Model, *550,000 Workers Lose Status by End of 2025: Potential Impact by State and Industry* (Nov. 19, 2025), <https://budgetmodel.wharton.upenn.edu/p/2025-11-19-550-000-workers-lose-status-by-end-of-2025/>; (There are 1.3 million TPS holders in the U.S. who contribute billions of dollars to the economy, especially in Florida, Texas, California, and New York); see also Miriam Jordan, *Haitians Are Vital to U.S. Health Care. Many Are About to Lose Their Right to Work.*, N.Y. Times (Jan. 29, 2026), <https://www.nytimes.com/2026/01/29/us/trump-tps-haitians-health-care-job-losses.html>.

17. FWD.us, *Temporary Protected Status Protects Families While Also Boosting the U.S. Economy* (Mar. 21, 2025), <https://www.fwd.us/news/temporary-protected-status-report-2025/>.

her livelihood, her assets, and her access to medical care during her pregnancy.

R.D. is from Nepal and has had TPS since 2018. He first came to the Northern Mariana Islands on a temporary work visa in 2001. He was paid \$3 per hour and his family lived in poverty. After his TPS approval, the family moved to the United States where he was able to work jobs that afforded his family financial stability they had never previously known: he bought a car, rented a safe and stable apartment, and was able to financially support his son and help cover his college tuition. Most recently, R.D. worked as a direct support professional caring for individuals with physical and developmental disabilities. He loved this work and took great pride in supporting people who depended on him. But when TPS abruptly ended, he was forced to quit his job in August, losing not only his income but also work he found meaningful and dignifying. The sudden loss of TPS has devastated every part of his life. He feels hopeless at the loss of TPS as he will lose not only his livelihood, health insurance, and ability to support his children's education, but also the pride and dignity he derived from helping others.

O.R. is a TPS holder from Venezuela under the 2023 designation along with her four children, three of whom are adults and the youngest is a teenager in high school. The family fled Venezuela after corrupt police officers attacked and robbed her two teenage sons, hitting them with a car while the boys rode together on a motorcycle. One of her sons survived the attack, but the other, 17 years old at the time, died at the scene from his injuries. Reeling from the tragedy, the family found safety, stability, and a measure of healing in the U.S. in keeping

with the humanitarian purpose of TPS. However, O.R. and two of her adult children all lost their jobs at Walmart when the Supreme Court permitted Venezuelan TPS to be terminated. In Venezuela, O.R. had been a merchant marine and administrative professional and her adult children also hold professional degrees. Their stability dashed, the family does not know how they will survive without work authorization and fear returning to the violence they fled in Venezuela.

M.A.B. is a TPS holder from Cameroon. She is the sole provider for her mother, sister, and two young brothers, all of whom are lawful permanent residents. She arrived in the United States in 2011 fleeing violence in the Cameroonian Civil War. She was fifteen years old. M.A.B.'s TPS status is critical to the family because her mother is unable to work due to a health condition, her sister is a student, and her brothers are too young to work. One of her brothers is also autistic and requires special treatment. MAB works four jobs to support the family and put food on the table. Termination of TPS would jeopardize her entire family's survival.

J.D. is a South Sudanese TPS holder who is proud of his work drilling and repairing water wells. He has become a valued community member in his rural community where he has responded to urgent calls when people and animals have been unable to access clean water due to natural disasters, as well as assisting with routine drilling and repairs of water wells. The announcement of the TPS termination has already harmed J.D.'s job prospects because people do not want to hire him for longer-term jobs based on the risk TPS will be terminated in the near future. J.D. fears he will have no way to remain in, or

return to, the U.S. because of the pause of immigration adjudications and travel ban.¹⁸

Y.C. is a former TPS holder from Nicaragua who has lived in the United States since 1996. She is a cancer survivor who suffers from several health conditions that require ongoing treatment and medication. She has had surgery to remove tumors on her breast, uterus, and thyroid. For 23 years, she worked as a supervisor at a golf course. When she lost her health insurance benefits, she took other employment and was able to qualify for subsidized healthcare through the exchange. Once TPS was terminated, she no longer qualified. She now cannot afford medical appointments and treatments. She does not know how she will survive financially and without medical care.

L.G., his wife and their daughter are all TPS holders. They are stateless Palestinian refugees who had refugee status in Syria. L.G.'s daughter has been in the U.S. since she was a toddler. L.G. and his family had work permits based on their pending asylum application, but those have expired. The family is not able to renew their asylum-based work authorization because of the pause on affirmative immigration application adjudications for Syria. L.G. is unable to work and his savings are quickly dwindling. He fears employment authorization under TPS will no longer be an option given the government's attempt to terminate Syria's designation. L.G. is afraid to return to Syria because of his past work supporting the U.S. government.

18. *See supra* note 4.

A widow and single mother of two young children, **G.Q.** used to have TPS but is now unemployed since Venezuela's designation was terminated and she lost her work authorization. In April 2025, G.Q.'s husband was fatally struck by a bullet when a gunman opened fire inside a barbershop in a California city. Her two children, ages 11 and 5, were present and witnessed their father's murder. G.Q.'s husband died protecting their children. The family's already painful situation was compounded when G.Q. lost her retail job in June 2025. She now has no way to support herself and her two children. Their survival is day to day.

d. Educational Disruption

TPS has provided the safety and stability for holders and their families to gain access to education they would not otherwise have attained. Terminations would rupture these gains, either by forcing return to countries of origin or by stripping the financial means to pay for higher education, or both.

D.H. is a Syrian TPS holder who is completing his residency in internal medicine. He works at a clinic where he assists patients with a wide range of medical issues every day. He provides primary care focused on preventing disease and catching illnesses early to reduce the high toll and costs of late-presenting conditions. He also takes care of more complex, medically fragile patients with multiple chronic conditions who are in need of continuous care at a nonprofit hospital. D.H. has fifteen months remaining of his residency. If TPS is terminated before then, he will be unable to complete his training and his career and ability to treat patients will be derailed.

R.B. is a former TPS holder from Nepal who has lived in the U.S. since he was 8 years old. This is the only country he considers home. Growing up, his parents worked very hard to make ends meet; his father worked three jobs while his mother spent 12-hour days working as a housekeeper. Seeing his parents' financial hardship, R.B. became determined to succeed academically and lift his family out of poverty. While attending college in 2024, he was selected as a summer analyst for JP Morgan in Chicago for 2025—one of only 30 finalists out of 4,000 applicants. The position would have placed him on a direct path to a starting salary of \$110,000 upon graduation. However, when human resources flagged that his employment authorization may expire during the summer, they withdrew the offer. With the current termination of TPS, the entire family is unemployed and R.B. does not know how he will support them even with his college degree since he is unable to work lawfully. He feels all the hardship his parents endured so he could receive an education will have been in vain.

S.F. and her husband recently lost their employment authorization when TPS was terminated for Honduras. They have two children, one is a U.S. citizen and the other is a green card holder. S.F. is a breast cancer survivor who has had four surgeries on her breasts. S.F. worked for years in a school district and had her “dream job” of being a school secretary until she lost her work authorization. Her husband worked in transportation for eighteen years and S.F. received health benefits through his job, but he has also lost work authorization. They are surviving on their limited savings, without prospects of returning to lawful employment. Their daughter is 17 and had been preparing to attend college, though her future is now

uncertain. Most of all, S.F. is heartbroken that she will not be able to assist with their daughter's education as she did for their son. Instead, their daughter is working to help pay their mortgage while finishing high school.

e. Detention and Forced Removal

For countries with already terminated designations, the harms are not hypothetical. U.S. citizen children are already facing separation from their parents during a critical developmental stage, and parents are facing the impossible decision of whether to continue to be separated from their children or bring them to a country with a lack of resources and political instability.

M.A. is a Venezuelan national who was deported and is now separated from her U.S. citizen infant daughter and her husband, who was also a TPS holder. M.A. was arrested at an ICE check-in despite her pending TPS renewal and affirmative asylum application. Her husband is currently surviving on savings and is unable to work because he must care for their infant daughter. Their child is showing signs of increased separation anxiety and becomes distraught when separated from her father. The child has already been harmed by the indefinite separation from M.A.

W.F. is a 24-year-old Venezuelan woman who had TPS prior to its termination. She is the mother of a two-and-a-half-year-old U.S. citizen child with level 3 autism—the most severe form. W.F. was detained at an ICE check-in last August, and in December 2025 she was removed to Venezuela. At the time, her son was undergoing assessments for delayed speech. W.F. received the news of her son's diagnosis while she was in immigration detention and was in anguish because she was unable to be with her

child during such difficult times. Since being separated from W.F., who was his primary caregiver, her son has not been receiving the treatment and therapies that he needs. W.F.'s son is currently with his father, an asylum seeker and TPS holder, who is doing everything he can to care for his child while also putting food on the table. W.F. is in severe emotional distress because she is separated from her child and knows he needs treatment. Her son doesn't recognize her when they speak on the phone or video calls. The family is now facing an inconceivable decision: an indefinite separation between W.F. and her young, disabled child, or bringing him to Venezuela, where he will be deprived of the care that he needs due to ongoing crises in the healthcare system, economy, and government of Venezuela.

From the outset, the current presidential administration has made clear that it views mass terminations as a policy priority.¹⁹ If this Court upholds the terminations at issue here, there is every reason to expect that the same reasoning will be applied to other designations as they come due. This would trigger a cascading series of terminations, stripping protections from millions. A ruling that permits the government to terminate TPS without meaningful regard for any of the consequences that will follow will expose every remaining TPS holder to a disastrous fate, regardless of the current conditions in the countries they would be sent back to, length of their residence in the United States or depths of their ties to this country and their communities.

19. Exec. Order 14159 (Jan. 20, 2025), *Protecting the American People Against Invasion*, <https://www.whitehouse.gov/presidentialactions/2025/01/protecting-the-american-people-against-invasion/> (citing TPS specifically as a policy to limit).

III. TPS Holders Face Genuine and Documented Danger Upon Forced Return to Their Countries of Origin

The countries with TPS designations that have been terminated or placed in legal jeopardy share a common feature: they are places from which people fled, and to which forced return is not merely inconvenient or disruptive, it is dangerous. For many TPS holders, the conditions that drove their original displacement have not been resolved. Rather, they have intensified.

TPS was designated precisely for this contingency. The statute recognizes that some conditions—armed conflict, environmental disaster, epidemic, and other extraordinary circumstances—are severe enough to make return unconscionable while those conditions persist. 8 U.S.C. §§ 1254a(b)(1)(B)(i), (b)(1)(C). The terminations at issue here, as well as others with similar legal uncertainty, do not reflect a determination that those conditions have improved, but a decision to terminate regardless. That distinction matters enormously for the people who bear the consequences.

Many TPS holders left their countries of origin after experiencing or witnessing violence, persecution, or disaster firsthand. For these individuals, termination does not present a theoretical legal question, it presents a concrete threat to their physical safety. Some fled gang violence and targeted killings. Some fled political persecution and state-sponsored repression. Some fled the aftermath of earthquakes, hurricanes, and other catastrophic events that destroyed the infrastructure on which daily life depends. For countries like Haiti and Afghanistan, the dangers to TPS holders can be directly

linked to U.S. foreign policy and interventionism.^{20,21} Returning them to those same conditions—conditions that have not materially improved, and in many cases have worsened—is not consistent with the humanitarian purposes Congress embedded in the TPS statute. The danger is not speculative; it is real.

B.P. is a Haitian TPS holder who arrived in the U.S. in December 2023. He is currently working as a community organizer in Springfield, OH, where he helps Haitian migrants get settled in the U.S. In Haiti, B.P. was a human rights defender; he specifically worked on combatting corruption and the recruitment of child soldiers.²² As a result of his activism, B.P. was targeted, kidnapped and tortured by the gangs. He lives in fear of having to return to Haiti, as he will face further persecution. B.P. is currently receiving ongoing mental health treatment and is unable to recount what he endured in Haiti without experiencing significant trauma responses. B.P. is presently residing in Springfield with his elderly mother, who is also a legal permanent resident. B.P.'s mother suffers from diabetes and several mental health conditions; he is her caregiver. In addition to being afraid of returning to Haiti for fear of the treatment he will receive, B.P. is worried about

20. See, e.g., Monika Evstatieva, *Despite Ongoing Taliban Threats, U.S. is Ending Some Protections for Afghans*, N.P.R. (July 14, 2025), <https://www.npr.org/2025/06/12/nx-s1-5406198/trump-immigration-afghanistan-taliban>.

21. See, e.g., Lindstrom, Beatrice, *With Haiti on the Brink of Collapse, a Reckoning for US Policy on Haiti*, Just Security (March 9, 2024), <https://www.justsecurity.org/93193/with-haiti-on-the-brink-of-collapse-a-reckoning-for-us-policy-on-haiti/>.

22. Daniel Dickinson, “Alarming Increase” in Recruitment of Children into Gangs in Haiti, U.N. News (Feb. 20, 2026), <https://news.un.org/en/story/2026/02/1166954>.

what will happen to his mother if he is forced to separate from her.

P.Z. entered the U.S. in April 2021 after fleeing targeted violence in Haiti. P.Z. and his family were known for their religious leadership and influence in their community. In October 2020, armed gang members entered a church where P.Z. and his family were leading service and kidnapped him. Because of the kidnapping and continuing danger posed by gang violence, the family was forced to leave Haiti and seek protection in the U.S. P.Z. has a pending asylum claim, but TPS is the only protection he has right now that is allowing him to remain in the country lawfully. Despite this uncertainty, P.Z., a medical professional back in Haiti, has continued to pursue his path of service in the U.S.—he passed all three steps of the United States Medical Licensing Examination (USMLE), and he is currently completing an internal medicine residency. He hopes to continue serving underserved rural communities when he completes his studies. Forcing P.Z. to return to Haiti would separate him from his family, place his life in extreme danger and deprive the U.S. of a highly trained physician at a time when medical professionals are urgently needed.²³

A.D. fled Afghanistan to come to the United States after spending about ten years working as a journalist

23. According to the Association of American Medical Colleges (AAMC), the United States will face a physician shortage of up to 86,000 doctors by 2036, with many communities already experiencing a lack of health care providers and access to adequate health care. Ass'n of Am. Med. Colls., *Addressing the Physician Workforce Shortage*, <https://www.aamc.org/advocacy-policy/addressing-physician-workforce-shortage> (last visited Apr. 6, 2026).

covering programs supported by the U.S. Embassy in Kabul. His work contributed to efforts to strengthen media, freedom of expression, civic engagement, and public awareness. A.D.'s work supported democratic values, independent journalism and civil society, and because of this he was exposed to great danger. Over the years, he faced threats and intimidation that didn't allow him to remain in Afghanistan safely. A.D. initially entered the U.S. on parole. He was later granted TPS which gave him a greater sense of safety, stability and protection while he worked to rebuild his life in the U.S. A.D. fears returning to Afghanistan because he will be targeted by the Taliban for the valuable work he was doing before he left.

N.D. is a Burmese national who has had TPS since January 2023. TPS is her only form of immigration status. N.D. came to the U.S. in August 2021 on a Fulbright scholarship to study social work. A few months before she entered the U.S., Burma went through a violent coup. Although N.D. is now in the U.S., she still cannot compartmentalize the trauma and brutality she witnessed back in Burma. After becoming a medical doctor in 2015, N.D. chose to work in conflict-affected regions throughout Burma. She treated women and girls who had been raped by the military, providing medical care and psychological support. For close to 5 years, she worked closely with Rohingya communities who were subjected to systemic persecution and genocide by the Burmese military. She treated women and girls who had experienced extreme sexual violence and trained local doctors and community workers in human rights and emergency care. She also participated in peaceful protests against the military coup. This work and advocacy put N.D. at great risk—she was targeted by the Burmese military, her family was surveilled and threatened and her bank account frozen.

She fears arrest, detention and sexual violence if she is deported to Burma.

These accounts are not exceptional, they are representative. They illustrate what the administrative record and country conditions evidence confirm: that for a substantial portion of the TPS population, forced removal is not a return to normalcy. It is exposure to the very harms from which TPS was meant to provide refuge.²⁴

CONCLUSION

This Court should not allow the formal mechanics of termination to obscure the human reality that the government is attempting to strip TPS holders of the very refuge their protected status was meant to provide. The individuals described in this brief are not fictional characters. They are long-term residents of this country who have built families, sustained communities, and contributed to the national economy, all while complying with the legal framework Congress created for exactly their circumstances. Forcing TPS holders' return to conditions of violence, instability, and disaster would

24. The government has argued that TPS holders can pursue other forms of immigration relief, like asylum. Application to Stay Order Issued by the United States District Court for the Southern District of New York at 31, *Noem v. Dahlia Doe*, No. 25-1083 (U.S. Feb. 26, 2026). This claim rings hollow where it has simultaneously paused adjudication of affirmative applications for individuals from most TPS-designated countries. *See supra* note 4; Policy Memorandum, U.S. Dep't of Homeland Sec., *Hold and Review of All Pending Asylum Applications and All USCIS Benefit Applications Filed by Aliens from High-Risk Countries* (Dec. 2, 2025).

cause irreversible harm to them, their families and the communities that depend on them. Beyond the human cost, TPS termination is contrary to the statutory framework and to Congress's intent to ensure a dependable humanitarian protection regime. For these reasons, the Court should affirm the circuit courts' judgments.

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Respectfully submitted,

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