

Nos. 25-1083 and 25-1084

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IN THE  
**Supreme Court of the United States**

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

*v.*

DAHLIA DOE, *et al.*,  
*Respondents.*

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

*v.*

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

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ON WRITS OF CERTIORARI BEFORE JUDGMENT TO THE  
UNITED STATES COURTS OF APPEALS FOR THE SECOND  
AND DISTRICT OF COLUMBIA CIRCUITS

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

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## STATEMENT OF INTEREST

*Amici* are cities and local government leaders from across the country who share a strong interest in preserving the wellbeing of their community members, including many residents holding Temporary Protected Status (TPS).<sup>1</sup> Because *amici* represent jurisdictions with some of the largest TPS populations in the United States, including Haitian and Syrian TPS holders, we are well aware of the crucial social, economic, and cultural contributions of TPS beneficiaries to our society. These constituents—many of whom have lived in our communities for years and even decades—are valued employees and employers, homeowners and neighbors, co-workers and small business owners, teachers and students, parents and children, caregivers and healthcare workers, fruit pickers and line cooks, religious leaders and congregants. As individuals, these residents will suffer real and irreparable harms if they are stripped of their legal status and work authorization. Our communities, too, will suffer economic losses, the mass rupturing of families, and widespread vacancies in crucial workforces that form the bedrock of our local economies.

## SUMMARY OF ARGUMENT

Apart from the flaws in the Government’s argument that executive policy choices are exempt from judicial review and that it complied with federal laws in terminating

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1. No party or party’s counsel authored this brief in whole or in part and no party or party’s counsel contributed money intended to fund preparation or submission of this brief. A list of all *amici* is provided at Appendix A.

TPS designations for Haiti and Syria (which Respondents ably address), the Government also casts aside the irreparable harms at the individual and community scale that will result from stripping legal status from an entire population of essential residents, workers, and community members. *Amici* are intimately aware that when immigrants living in our cities have protection from detention and deportation and are authorized to work lawfully, they contribute to our economies as valuable members of our workforces, as taxpayers, and through their spending power. They not only openly participate economically, but also educate their children (many of whom are U.S. citizens), access healthcare, and otherwise deeply integrate into American communities, which benefits society as a whole.

In sharp contrast, the revocation of legal status that the Government seeks here—without complying with the statutorily mandated processes or country condition related criteria—would cause immeasurable harms to TPS holders and their families and burden *amici*'s local economies, industries, and governments. If this Court rules in favor of the Government, residents who had legal status when they went to bed the night before will be subject to deportation in the morning. The resulting loss of status for thousands of Haitians, Syrians, and individuals from other TPS-designated countries whose futures depend on pending litigation will cause profound damage in *amici* communities—to both our local governments and to our residents. Our cities and counties will suddenly become home to thousands of undocumented immigrants, who will be unable to lawfully work in essential jobs and afraid to interact with government officers. Parents will have to make an unimaginable choice: leave their citizen children

in the care of the state and return to their countries of origin in crisis, or keep their families together and bring their children into harm's way. In either case, *amici* have a profound interest in the safety and welfare of the children who reside within their jurisdictions. Moreover, a ruling in favor of the Government in these cases may cause *amici* to become responsible for the hundreds of thousands of U.S. citizen children of TPS holders whose parents self-deport or are deported by the Government to unstable countries. This is because, although the consolidated cases before the Court concern Haiti and Syria specifically, the legal questions in this matter impact nearly every TPS holder in the country.<sup>2</sup>

For these reasons, and those presented by Respondents, this Court should reject the Government's position and uphold the district courts' orders postponing the effective date of TPS terminations for Haiti and Syria.

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2. See, e.g., *Afr. Cmty. Together v. Noem*, 2026 WL 395732 (D. Mass. Feb. 12, 2026), *appeal docketed*, No. 26-1254 (1st. Cir. Mar. 13, 2026) (concerning TPS for South Sudan); *Nat'l. TPS All. v. Noem*, 166 F.4th 739 (9th Cir. 2026) (concerning TPS for Venezuela and Haiti); *Nat'l TPS All. v. Noem*, 798 F. Supp. 3d 1008 (N.D. Cal. 2025) (concerning TPS for Honduras, Nepal, and Nicaragua); *CASA, Inc. v. Noem*, No. 25-1792, 2025 WL 2028397 (4th Cir. July 21, 2025) (concerning TPS for Afghanistan and Cameroon).

## ARGUMENT

### I. TPS HOLDERS, INCLUDING THOSE FROM HAITI AND SYRIA, HAVE DEEP ROOTS IN AMICI COMMUNITIES AND ARE INTEGRAL TO LOCAL ECONOMIES AND WORKFORCES

There are more than 1.2 million TPS holders across the country, including more than 400,000 in Florida, nearly 150,000 in Texas, and nearly 100,000 in New York.<sup>3</sup> Many of these immigrants are long-term residents of our communities: on average, TPS recipients have spent more than twenty years in the U.S.<sup>4</sup> Haiti and Syria are both countries with longstanding TPS designations—Haiti was first designated in 2010 and Syria in 2012—so TPS beneficiaries from these countries are, like other TPS holders, generally long-term U.S. residents. Specifically, as of 2017, 16 percent of Haitian TPS holders had lived in

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3. *Temporary Protected Status (TPS) Fact Sheet* at 8, Forum Together (Feb. 17, 2026), <https://perma.cc/HT8E-QTJD>.

4. Diana Roy & Claire Klobucista, *What is Temporary Protected Status?*, Council on Foreign Relations (Jul. 9, 2025), <https://perma.cc/WE5L-H2X5>.

the U.S. for two decades or more.<sup>5</sup> Similarly, a 2025 survey of a sample of Syrian TPS holders found that 32 percent had lived in the U.S. with TPS for 10 years or longer.<sup>6</sup> The named plaintiffs in *Dahlia Doe v. Noem* illustrate this trend. *See, e.g., Dahlia Doe v. Noem*, 1:25-cv-08686, Dkt. No. 20.<sup>7</sup>

Despite living with the uncertainty and instability attendant to having temporary status, U.S. residents from TPS-designated countries have built their lives and naturally integrated into the social, physical, and economic fabric of *amici*'s communities. TPS holders have completed

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5. Robert Warren & Donald Kerwin, *A Statistical and Demographic Profile of the US Temporary Protected Status Populations from El Salvador, Honduras, and Haiti*, 5 J. Migration & Hu. Security 577, 578 (2017) (estimates based on analysis of the Census Bureau's American Community Survey). Notably, both El Salvador and Honduras, among other countries, were first designated for TPS in the late 1990s or early 2000s and have been extended or redesignated since, so TPS holders from those countries too are long-term, fully integrated residents of *amici*'s communities. *See id.* at 581 (more than half of TPS holders from El Salvador and Honduras have resided in the U.S. for more than twenty years).

6. *Syrians on Temporary Protected Status*, Immigrants Act Now (2025), <https://perma.cc/XJD4-PPQE>.

7. Decl. of Guadalupe Aguirre ISO Plaintiffs' Motion to Postpone, Ex. 39, Decl. of Dahlia Doe (plaintiff has been in the U.S. since 2015); Ex. 40, Decl. of Sara Doe (plaintiff has been in the U.S. since 2014); Ex. 41, Decl. of Nesma Doe (plaintiff has been in the U.S. since 2013); Ex. 42, Decl. of Laila Doe (plaintiff has been in the U.S. since 2013); Ex. 43, Decl. of Waleed Doe (plaintiff has been in the U.S. since 2011); Ex. 44, Decl. of Mustafa Doe (plaintiff has been in the U.S. since 2021); Ex. 45, Decl. of Ahmad Doe (plaintiff has been in the U.S. since 2022).

formal education, started businesses, participated at exceptionally high rates in the workforce, filled positions in critical industries, and raised U.S. citizen children in our communities. Notably, TPS beneficiaries are ineligible for status if they have been convicted of any felony or two or more misdemeanors, and they are vetted by the federal government each time their status is renewed. *See* 8 U.S.C. §§ 1254a(c)(2)(B), 1254a(c)(3)(A).

TPS holders reside in all 50 states, the District of Columbia, and in U.S. territories, although their populations are heavily concentrated in certain jurisdictions. For example, over half of Haitian TPS holders, approximately 158,000 people, reside in Florida.<sup>8</sup> Significant populations of Haitian TPS recipients also reside in Massachusetts, New Jersey, New York, and Ohio.<sup>9</sup> Syrian TPS holders are mostly concentrated in Florida, California, Texas, Michigan, and Illinois.<sup>10</sup>

Many TPS holders arrived in the U.S. as children under the age of 16.<sup>11</sup> Other TPS holders were adult professionals who once had comfortable lives in their

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8. *Haitian TPS Holders Make the U.S. Stronger*, UndocuBlack Network, Haitian Bridge Alliance, & FWD.us (Jan. 2026), <https://perma.cc/BRB9-ABJV>; *See* Jill H. Wilson, Cong. Rsch. Serv., *Temporary Protected Status and Deferred Enforced Departure* at 8 (Aug. 28, 2025) (Approximately 330,735 Haitian nationals with TPS status currently live in the U.S., making up approximately a quarter of the total 1,297,635 TPS beneficiaries).

9. *Haitian TPS Holders Make the U.S. Stronger*, *supra* n.8.

10. *Syrians on Temporary Protected Status*, *supra* n.6.

11. *See* Warren & Kerwin at 577, *supra* n.5.

countries of origin before violence or environmental disaster forced them to flee.<sup>12</sup> In the U.S., TPS holders have worked in jobs that no one else would take and filled crisis-level staffing gaps in critical healthcare roles. Some have helped to revive struggling small towns by bringing back manufacturing-based economies. All the while, TPS holders have paid taxes, bought property, and put their children through trade school or higher education.<sup>13</sup>

**A. Across the Country, TPS Holders Are Vital to Local Economies and Disproportionately Occupy Roles in Essential Industries, Including Healthcare**

Across the country, TPS holders contribute to the financial health of the jurisdictions where they reside. Collectively, TPS holders add \$35.9 billion to the U.S. Gross Domestic Product, with the largest contributions to manufacturing (\$5.5 billion), construction (\$5 billion), retail trade (\$3.9 billion), transportation and warehousing (\$3.4 billion), accommodation and food services (\$3.2 billion), and administrative and waste management

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12. See, e.g., Jacqueline Charles, *'I am breathing, but I am not living': Fear rises among Haitians as TPS end nears*, Miami Herald (Jan. 30, 2026), <https://perma.cc/5W9W-RKNA> (telling the story of one Haitian TPS holder who was a working professional before gang violence forced her to flee to the U.S.).

13. *Id.*; Sarah Rahal & Lila Hempel-Edgers, *Court's ruling on Haiti TPS brings relief but little certainty to immigrants in Massachusetts*, Boston Globe (Mar. 8, 2026), <https://perma.cc/5C5R-V2RE>.

services (\$2.4 billion).<sup>14</sup> These economic contributions impact local economies significantly. For example, in the greater Miami metropolitan area, TPS holders are responsible for approximately 4 percent of hours worked in transportation and material moving, and in the greater D.C. area TPS holders account for 8.3 percent of all hours worked in construction and 9.3 percent in building and grounds cleaning and maintenance.<sup>15</sup> Overall, labor force participation by TPS holders is exceptionally high. The national employment rate of TPS holders has been estimated to be between 79 and 95 percent in recent years, higher than both the U.S.-born population and foreign-born non-TPS residents.<sup>16</sup>

Haitian and Syrian TPS holders exemplify the economic contributions of immigrants with TPS status generally. More than 330,000 TPS-eligible Haitians

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14. Jesus Villero, Brendan Warshauer & Youran Wu, *550,000 Workers Lose Status by End of 2025: Potential Impact by State and Industry*, Penn Wharton Budget Model (Nov. 19, 2025), <https://perma.cc/7RNH-GKN5>.

15. *Id.*

16. *The Contributions of Temporary Protected Status Holders to the U.S. Economy*, Am. Immigr. Council at 2 (Sept. 2023), <https://perma.cc/D65Q-6SDV> (estimating a 94.6 percent national employment rate of TPS holders in 2021 based on an analysis of 1-year American Community Survey data from 2021); Jesus Villero, Brendan Warshauer & Youran Wu, *550,000 Workers Lose Status by End of 2025: Potential Impact by State and Industry*, Penn Wharton Budget Model (Nov. 19, 2025), <https://perma.cc/7RNH-GKN5> (estimating 79.4 percent overall labor force participation among TPS holders, compared with 64.5 percent of the U.S. born population and 67.6 percent of the foreign-born non-TPS population, based on 2022-2023 American Community Survey data).

contribute between \$4.4 and \$5.9 billion annually to the U.S. economy.<sup>17</sup> In Florida alone, approximately 93,000 Haitian TPS holders are actively employed, annually contributing \$1.5 billion to the Miami metropolitan economy, \$329 million to the Orlando economy, and \$125 million to the Tampa economy.<sup>18</sup> Likewise, although only about 6,000 Syrian TPS holders reside in the U.S.,<sup>19</sup> this small population contributes an estimated \$100 million to the U.S. economy annually.<sup>20</sup>

Nationally, TPS holders contribute \$5.2 billion in combined federal, payroll, state, and local taxes. Haitian TPS holders in Florida contribute \$300 million in federal and payroll taxes, and an additional \$306 million in state and local taxes.<sup>21</sup> Similarly, the estimated 40,000 Haitian

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17. Letter from Maura Healey, Governor of Mass., to Kristi Noem, Secretary of the Dep't of Homeland Security (Jan. 30, 2026), <https://perma.cc/9FYM-H4YB> (estimated contribution of \$4.4 billion); *Haitian TPS Holders Make the U.S. Stronger*, *supra* n.8 (estimated contribution of \$5.9 billion).

18. *Haitian TPS Holders Make the U.S. Stronger*, *supra* n.8.

19. *Dahlia Doe v. Noem: Challenging the government's termination of TPS for Syrians*, International Refugee Assistance Project, <https://perma.cc/D46D-245A>.

20. *Temporary Protected Status protects families while also boosting the U.S. economy*, FWD.us (Mar. 21, 2025), <https://perma.cc/JAY2-HG3R>. The population of Syrian TPS holders is far smaller than the population of Haitian TPS holders. Temporary Protected Status (TPS) Fact Sheet at 1–2, Forum Together (Feb. 17, 2026), <https://perma.cc/HT8E-QTJD>. For that reason, there is more detailed information available about the specific role that Haitian TPS holders play in the economy.

21. *Haitian TPS Holders Make the U.S. Stronger*, *supra* n.8.

TPS holders in New York contribute \$863 million annually to the state's economy and an additional \$281 million in federal, state, and local taxes.<sup>22</sup> In Boston and Suffolk County, foreign-born Haitian residents contribute \$2.4 billion dollars to Boston's Gross City Product, pay \$33 million in state income tax, and generate more than 5,000 indirect jobs.<sup>23</sup> These macro-economic contributions are critical to the economy at the national, state and local levels.

While there is limited data about the occupations of Syrian TPS holders in the U.S., data shows these immigrants are generally highly educated: one survey found that 72 percent had completed education in the U.S., with 45 percent holding an advanced degree.<sup>24</sup>

Critically, both Syrian and Haitian TPS holders work disproportionately as caregivers. Nearly 50 percent of Syrian TPS holders work in the healthcare sector.<sup>25</sup>

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22. *Id.*

23. City of Boston Plan. Dep't Rsch. Div., *Foreign Born in Boston: Haitians*, at 21–22, <https://perma.cc/DU6S-LN3Y>.

24. Syrians on Temporary Protected Status, *supra* n.6; *cf.* Jie Zong, *Profile of Syrian Immigrants in the United States* at 5, Migration Pol'y Inst. (Nov. 2015), <https://perma.cc/Y5NM-LLKM> (2015 study showing that 49 percent of Syrian immigrants in the U.S. work in management, business, science, or arts occupations); *see also Dahlia Doe v. Noem*, 1:25-cv-08686, Dkt. No. 20–40 at ¶¶ 3, 8 (Plaintiff Sara Doe is a sought-after highly specialized pediatric doctor).

25. Syrians on Temporary Protected Status, *supra* n.6.

Similarly, many Haitian TPS holders are caregivers working in health, disability, and elder-care fields that have faced a workforce crisis caused by extreme labor shortages.<sup>26</sup> Many of the Haitian immigrants who care for elderly members of our communities have received training and are certified as nursing assistants, and work as home health aides or as staff in senior living facilities.<sup>27</sup> In many cases, states have invested in training programs for immigrant workers to become certified for health sector roles.<sup>28</sup> In addition to filling direct care roles, Haitian TPS holders and other immigrants make up 30 percent of maintenance and cleaning staff in nursing homes.<sup>29</sup>

The role of immigrants, and TPS holders specifically, in the elder-care field is especially vital given persistent

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26. 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://perma.cc/6VPJ-DY9P> (“Haitians filled about 111,000 health care positions in the United States in 2023...”).

27. An estimated 13,000 Haitian TPS holders are nursing assistants, and an additional 8,000 are caregivers. *Haitian TPS Holders Make the U.S. Stronger*, *supra* n.8. See also Tami Luhby, *Many Haitians may soon not be able to work in the U.S. That will make caring for the elderly much harder*, CNN Business (Feb. 1, 2026), <https://perma.cc/9YPV-5Z8F>.

28. See Amy Stulick, *Inside State Initiatives Boosting Immigrant Labor in Nursing Homes Amid Trump’s Deportation Threats*, Skilled Nursing News (Jan. 27, 2025), <https://perma.cc/B6GR-9NPA>.

29. Zahida Siddiqi, *Fears Mask a Deeper Workforce Crisis Unfolding in Nursing Homes Amid Tighter Immigration Policies*, Skilled Nursing News (July 29, 2025), <https://perma.cc/667F-29JQ>.

and severe workforce shortages in the industry: Florida has the second-largest population of adults over age 65 in the nation, yet “struggle[s] to meet the needs of its rapidly aging population.”<sup>30</sup> Historically, U.S.-born workers have tended to avoid employment in the elder-care industry, both because of the relatively low pay and the inherent demands of the work.<sup>31</sup> The essential role of immigrants in this sector is evident: a network of nonprofits that provide long-term care to seniors has said that for some of their member organizations, foreign-born employees make up 40 to 75 percent of their staff.<sup>32</sup>

For seniors who lose the care of qualified and experienced healthcare workers, there will be an immediate and dire impact. As the Home Care Association of Florida has warned, “[w]ithout enough workers to deliver critical services, seniors are at greater risk of avoidable hospitalizations, premature nursing home placement, and lower quality of life.”<sup>33</sup> The greater Miami metropolitan area would be particularly hard-hit if TPS is terminated for Haitian nationals—90,000 Haitian TPS

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30. *Florida’s Home Care Crisis Deepens as Nation Faces Direct Care Workforce Shortage*, Home Care Assoc. of Florida (May 6, 2025), <https://perma.cc/T7DK-FQN3>.

31. See Abel Fernández, *Trump’s immigration policy shakes up the elder care sector: ‘Losing these caregivers is a profound blow,’* El País (July 29, 2025), <https://perma.cc/2GLV-FYMB>.

32. *Id.*

33. *Florida’s Home Care Crisis Deepens*, *supra* n.30; see also Fernández, *supra* n.31 (discussing study finding that “many for-profit nursing homes use sedatives as a form of control when they are understaffed because ‘patients in chemical restraints require less work’ allowing them to operate with fewer workers”).

holders live in the area, and 6,000 work in health care.<sup>34</sup> As this data demonstrates, the Government’s attempt to terminate TPS for Haitians (and other foreign-born populations) without adhering to statutorily proscribed procedures directly threatens the ability of vulnerable seniors in our communities to maintain dignity and independence as they age.

Unsurprisingly then, local jurisdictions, especially cities in Florida, have urged the federal government not to plunge their communities into fear, uncertainty, and economic upheaval by terminating TPS status for Haitians. Miami-Dade County Mayor Daniella Levine Cava recently conveyed her support of the local Haitian community, standing with Haitian community leaders and reaffirming that “Haitian TPS holders are essential to the economy and culture of Miami-Dade County.”<sup>35</sup> Miami Mayor Eileen Higgins echoed those sentiments, calling the revocation of TPS “cruel” and stating that “our

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34. Max Klaver, *Haitian TPS ends on Tuesday. No economy will be hit harder than Greater Miami’s*, Miami Herald (Feb. 3, 2026), <https://perma.cc/DU2H-GZSG>.

35. *Mayor Daniella Levine Cava joins Haitian community in support of ruling blocking termination of TPS for Haitians*, Miami-Dade Cnty. Off. of the Mayor (Feb. 3, 2026), <https://perma.cc/3KMS-HLHG>.

Haitian community is part of the backbone of our city.”<sup>36</sup> Similarly, the Mayor and City Council of the City of North Miami unanimously adopted a resolution condemning the termination of TPS for Haiti and highlighting the “profound harm” that would result to “families, employers, schools, and community institutions.”<sup>37</sup>

TPS holders also play a vital role in the health, disability, and elder care workforce in Boston. Like many cities, Boston has historically faced healthcare staffing

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36. Sergio R. Bustos, *Miami mayor slams Trump for asking federal judge to end TPS for Haitians during court appeal process*, WLRN Pub. Media (Feb. 6, 2026), <https://perma.cc/P9SK-TW9K>. Mayor Higgins also spoke out against the end of TPS for Venezuela, calling the decision “reckless, dangerous, and wrong.” Chandelis Duster, *Miami mayor calls for Trump to “immediately” reinstate TPS for Venezuelans*, NPR (Jan. 4, 2026), <https://perma.cc/PX55-WXZ8>. Regarding Venezuelan TPS holders, Mayor Higgins wrote, “They have built lives here, contributed to our community, and deserve the security to remain while their homeland regains stability. This is not just a matter of policy—it is a matter of basic human dignity and safety.” *Id.*

37. *Resolution No. 2026-R-1: A Resolution of the Mayor and City Council of the City of North Miami, Florida, Denouncing the Termination of Temporary Protected Status (“TPS”) for Haiti and Urging President Donald J. Trump and the United States Congress to Reinstate TPS Protections for Haitians; Providing for an Effective Date and All Other Purposes* (Jan. 27, 2026), <https://perma.cc/5HJS-JVTY>.

shortages, and immigrants fill critical roles.<sup>38</sup> In fact, the number one occupation of Haitian TPS holders in Boston is nursing assistant, followed by janitor, home health aide, cook, and taxi driver.<sup>39</sup> Thus, nursing home facilities in the Boston area will also be hard-hit if the Administration's termination of TPS for Haitians is allowed to proceed. The medical director of one Boston-area network of nursing homes warned, "We are quite heavily reliant on these migrant workers... And suddenly a large portion of that will just evaporate."<sup>40</sup> Disability support service providers in Greater Boston, too, have already faced staffing shortages because of the termination of TPS for Haiti, with one organization losing 100 Haitian workers because of the instability created by the DHS Secretary's actions

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38. See Simón Rios, *As legal status is set to end for many Haitians, Mass. health care sector braces for staffing shortages*, WBUR (Aug. 7, 2025), <https://perma.cc/5VV4-A25S> ("State officials say health care facilities [in Massachusetts], which already struggle to hire enough workers, could be 'seriously disrupted' by the termination of TPS and other humanitarian programs, which have allowed thousands of immigrants to enter the workforce."); *Lawmakers Stand with Haitian Community as TPS Expiration Nears*, Mass. Immigr. & Refugee Advocacy Coalition (Jan. 22, 2026), <https://perma.cc/8ZHJ-7TAW> (in a hearing, members of Congress from Massachusetts discussed the contributions of Haitian TPS holders to Massachusetts' economy, including the healthcare sector).

39. City of Boston Plan. Dep't Rsch. Div., *Noncitizen Haitians in Boston*, Mayor's Off. of Immigr. Advancement (Apr. 2025), <https://perma.cc/VMK8-ZYAY>.

40. Rios, *supra* n.38.

regarding Haiti's TPS designation in the past year.<sup>41</sup> Termination of TPS status for Haiti would similarly cause severe workforce problems in Everett, Massachusetts, a short drive from Boston, where Haitian workers provide care to approximately 80 percent of older adults who are house-bound or reside in nursing homes.<sup>42</sup> Standing with local healthcare organizations and faith leaders, Everett Mayor Robert Van Campen and city councilors urged the federal government to extend TPS for Haiti.<sup>43</sup> Likewise, a director at a local nonprofit in Everett warned, "Ending TPS would force these trained, trusted, and culturally competent caregivers out of our communities, creating immediate harm to patients, families, and hospitals ...".<sup>44</sup>

Similarly, in Springfield, Ohio, many Haitian TPS holders work in critical healthcare roles, including as nurses or nursing assistants in community health care clinics and as caregivers for seniors.<sup>45</sup> As the county's health commissioner explained, "These folks are filling jobs that are some of the hardest for us to keep staffed."<sup>46</sup>

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41. Danny McDonald et al., *In Greater Boston, a temporary court reprieve and a legal limbo for Haitians*, Boston Globe (Feb. 3, 2026), <https://perma.cc/52DS-KVZC>.

42. *Statement on the Termination of Temporary Protected Status for Haitians*, City of Everett (Feb. 2, 2026), <https://perma.cc/2PMW-RZFF>.

43. *Id.*

44. *Id.*

45. Jordan, *supra* n.26.

46. *Id.*

The same is true in New York State, where nearly 30% of the 25,000-strong workforce of Haitian TPS beneficiaries serves their communities as caregivers or nursing assistants.<sup>47</sup> In Rockland County, just north of New York City, for example, non-profit agencies that provide services and residences for people with disabilities rely on the dedication of Haitian TPS holders.<sup>48</sup> In a field where employee retention is difficult—non-profit caregiving agencies are chronically understaffed and struggle with high turnover rates—Haitian TPS holders are long-term employees who even take on extra shifts to fill labor gaps.<sup>49</sup> Some of these immigrants have worked as care professionals for a decade or more.<sup>50</sup>

The consequences of reversing the district courts' orders in these consolidated cases and allowing the DHS Secretary to proceed with revoking work authorization from these essential workers will be felt immediately and concretely in cities around the country, with healthcare

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47. *Haitian TPS Holders Make the U.S. Stronger*, *supra* n.8.

48. Nancy Cutler, *How end of Haitian TPS threatens care for people with disabilities*, Lohud (Mar. 9, 2026), <https://perma.cc/7NBG-2ESM>.

49. *Id.*

50. *Id.*

facilities serving fewer patients, providing lower quality care, or even closing.<sup>51</sup>

### **B. Haitian TPS Holders Have Contributed to Reviving Struggling Rust Belt Towns and Industries**

Haitian TPS holders have additionally played a vital role in revitalizing the manufacturing-based economies of a number of small American towns, especially in the Midwest. For example, approximately 10,000 Haitians—including many TPS beneficiaries—now live and work in Springfield, Ohio, a working-class manufacturing city, making up a significant percentage of the city’s total population of about 60,000.<sup>52</sup> The influx of Haitian immigrant workers to Springfield has been essential to reshaping and reviving the economy of the city,<sup>53</sup> which had experienced decades of population decline and economic stagnation. The Haitian immigrant population has contributed to a reverse of this trend in recent years,

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51. Rios, *supra* n.38; see also Angela Bovill, *Viewpoint: Our Haitian healthcare workers must be protected*, Worcester Bus. J. (Jan 21, 2026), <https://perma.cc/W9K8-SA3P> (“Losing even a portion of [the long-term care] workforce will lead to fewer available beds, longer wait times, increased burnout for remaining staff, and potentially the closure of facilities families rely on. There is no backup workforce waiting to fill these roles.”).

52. Miriam Jordan, *An Ohio City Faces a Future Without Haitian Workers: ‘It’s Not Going to Be Good,’* N.Y. Times (Aug. 18, 2025), <https://perma.cc/9DSQ-86H7>.

53. Stephen Starr, *Haitians helped boost Springfield’s economy - now they’re fleeing in fear of Trump*, The Guardian (Oct. 25, 2025), <https://perma.cc/B4E5-SU5Y>.

as evidenced by Springfield’s distinction of holding the second-highest employment growth rate in the state since the COVID-19 pandemic.<sup>54</sup> Haitian immigrants in Springfield have filled manufacturing, warehouse, distribution, and service sector jobs, and have opened and operated small businesses.<sup>55</sup> The same is true in other Rust Belt towns, such as Lima and Findlay, Ohio, and small factory towns in Pennsylvania where Haitians and other immigrants with temporary statuses have filled labor shortages in automotive, chemical, and plastics manufacturing plants, as well as in warehouses.<sup>56</sup>

The threat to local economies in these small towns of terminating TPS is already evident. Since the Secretary announced the termination, Haitian immigrants have begun to leave Springfield or not show up to work.<sup>57</sup>

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54. *Id.*; see also Jessica Orozco, *Springfield employment gains among highest in Ohio since pandemic*, Springfield News-Sun (Jan. 20, 2025), <https://perma.cc/UT5P-EGP8>; see also Jordan, *supra* n.52 (“Over the last four years, Springfield had rebounded, thanks in large part to the arrival of Haitian immigrants.”).

55. Molly Bryden, *Revoking Temporary Protected Status for Haitian immigrants will further destabilize Springfield’s economy*, Pol’y Matters Ohio (Feb. 3, 2026), <https://perma.cc/DU8V-3UVL>.

56. Stephen Starr, *Midwestern cities fear fallout of Trump revoking Haitian residents’ status*, The Guardian (Mar. 3, 2025), <https://perma.cc/KA6G-H5R6> (describing cities in Ohio); Stephen Starr, *A Pennsylvania town is thriving with Haitian immigrants – and is the latest target of Republican hate*, The Guardian (Oct 20, 2024), <https://perma.cc/H9VS-JS8Q> (describing population growth and economic revitalization driven by Haitian immigrants moving to Charleroi, Pennsylvania, as well as accompanying political tensions).

57. Bryden, *supra* n.55; see also Starr, *supra* n.53 (“Springfield businesses, big and small, are struggling in the aftermath

The city is showing signs of an economic downturn as a result, with the labor force beginning to contract and tax revenue flattening.<sup>58</sup> This is occurring, in part, because in some states, including Ohio, TPS holders' drivers licenses expired along with the original date of TPS expiration (in early February) despite the district court's stay.<sup>59</sup> Without valid driver's licenses, TPS holders struggle to commute to work and hold jobs. Overall, the macro-economic impacts of allowing the DHS Secretary's termination of TPS status for Haiti to take effect will also be severe: Reporting suggests that if Haitian TPS holders leave Springfield, Clark County would lose approximately \$300 million in annual spending, with an estimated total economic loss to the County of over \$400 million.<sup>60</sup>

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of thousands of Haitians fleeing the town after the Trump administration's termination of the humanitarian parole program for citizens of several countries, including Haiti, in June."); *see also* Jordan, *supra* n.52 ("There is no official tally of how many Haitians have already left, but pastors, employers and others say dozens of Haitians have already left.").

58. Starr, *supra* n.53.

59. See Kathryn Mobley, *Many Haitians dealing with invalid driver licenses tied to original TPS end date*, WYSO (Feb. 12, 2026), <https://perma.cc/3B6E-CSSS>; Chelsea Jones, *Haitian immigrants in South Florida struggle with expired driver's licenses amid TPS uncertainty*, CBS News (Feb. 4, 2026), <https://perma.cc/RCB8-3AST> ("Community members say the issue [of expired driver's licenses] is affecting their ability to work, care for their families, and move around safely...").

60. Megan Henry, *Hundreds of Ohioans show support for Haitians, federal judge blocks TPS ending for Haitians* (Feb. 2, 2026), <https://perma.cc/K2LD-L4GM>.

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Taken together, the impacts of mass stripping of legal status from a subset of *amici*'s residents will cause serious and avoidable disruption to our local economies, to essential workforces across various industries, and to revitalization efforts. Those economic harms, which started when the Executive Branch began systematically terminating TPS designations on day one of President Trump's second term, would grow immediately and exponentially if this Court allows those terminations to take effect.

## **II. TERMINATING TPS WILL HARM U.S. CITIZEN FAMILY MEMBERS OF TPS HOLDERS AND BURDEN LOCAL GOVERNMENT SYSTEMS**

Terminating TPS for Haitians, Syrians, and immigrants from other countries will affect not only TPS holders themselves, but also their thousands of U.S. citizen children and other family members. Moreover, revoking work authorization, and thus erasing the economic independence and stability for families that come with it, will quickly cause downstream harms on municipalities, which provide critical safety net services to their residents.

### **A. Thousands of U.S.-Born Children Will Face Family Separation, Causing Numerous Harmful Human Impacts and Burdening Local Governments**

Having lived in the United States for years, sometimes decades, many TPS holders have formed mixed-status

families and have raised and educated their children in American communities. Over a quarter of a million U.S. citizen children live with a TPS holder.<sup>61</sup> Recent data indicates that at least 30,000 to 50,000 U.S. citizen children have a parent who is a Haitian TPS beneficiary,<sup>62</sup> and thousands more children live with a Haitian TPS family member in their household. In Boston, for example, 1,807 children are estimated to live with a non-citizen Haitian adult, and 75 percent of these children are U.S. citizens.<sup>63</sup> Likewise, approximately 7,000 U.S. citizens live with Syrian TPS holders, including many U.S. citizen children.<sup>64</sup>

If TPS is revoked, TPS recipients will be forced to face the untenable options of leaving behind their citizen

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61. *Temporary Protected Status protects families while also boosting the U.S. economy*, *supra* n.20.

62. Matthew Lisiecki & Kevin Appleby, *Venezuelan and Haitian TPS Beneficiaries Contribute to the Nation and Should Not Be Deported*, Ctr. for Migration Stud. (May 22, 2025), <https://perma.cc/858A-XPYG> (indicating that TPS holders from Haiti have 34,300 US-citizen children); *cf. Haitian TPS Holders Make the U.S. Stronger*, *supra* n.8 (“50,000 U.S. citizen children depend on their Haitian TPS parents’ contributions to the U.S. workforce.”).

63. City of Boston Plan. Dep’t Rsch. Div., *Noncitizen Haitians in Boston*, *supra* n.39.

64. *Temporary Protected Status protects families while also boosting the U.S. economy*, *supra* n.20; *see also Dahlia Doe v. Noem*, 1:25-cv-08686, Dkt. 20–39 ¶ 4, (Plaintiff Dahlia Doe lives with immediate family members who are U.S. citizen and legal permanent residents), Dkt. 20–42, ¶ 3 (Plaintiff Laila Doe lives with her mother who is a U.S. citizen), Dkt. 20–43 ¶ 4 (Plaintiff Waleed Doe has three U.S. citizen children).

children and/or partners, bringing family members with them to countries submerged in crisis, violence, and food insecurity,<sup>65</sup> or staying in the U.S. without any legal status or work authorization and facing the constant threat of deportation. The emotional and even physical harm that family separation would wreak on countless children and families cannot be overstated. These impacts on children who have been separated from their parents as a result of detention or deportation include “psychological trauma, material hardship, residential instability, family dissolution, increased use of public benefits, and, among boys, aggression.”<sup>66</sup> And living with the looming threat that a parent will be detained or deported by immigration enforcement authorities itself causes severe stress and related harm to children.<sup>67</sup>

Apart from these human impacts, state and county governments will be impacted by large-scale family

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65. Even if some TPS beneficiaries choose to depart the U.S. with their U.S. citizen children, they may face insurmountable bureaucratic obstacles to obtaining a passport for their child in time. See Stephen Starr, *The desperate drive to secure passports for thousands of US-born Haitian kids—before it’s too late*, The Guardian (July 4, 2025), <https://perma.cc/WVL4-GFRK>.

66. See Randy Capps, et al., *Implications of Immigration Enforcement Activities for the Well-Being of Children in Immigrant Families*, Urb. Inst. and Migration Pol’y Inst. at VI (Sept. 2015), <https://perma.cc/3WR4-536E>.

67. See Iqbal Pittalwala, *Child mental health crisis tied to immigration enforcement*, Univ. of Cal., Riverside News (Aug. 8, 2025), <https://perma.cc/KF52-JGQS>; *Deportation Threatens the Psychological, Physical, and Socioeconomic Well-being of Children and Families*, Soc’y for Rsch. on Child Dev. (Mar. 2025), <https://perma.cc/EV5B-A2W6>.

separation as administrators of the child welfare system. Many children left behind by TPS holder parents do not have another relative or guardian to take care of them, and these children will enter the foster care system. States and municipalities are already preparing for this eventuality. For example, the state of Ohio has reached out to children services departments in counties across Central Ohio that administer foster care programs, attempting to plan for the predicted influx of children left behind.<sup>68</sup> One Clark County juvenile court judge told a local news outlet that the child welfare system cannot manage the number of children who have no relatives or guardians to care for them.<sup>69</sup> Massachusetts Governor Maura Healey has introduced legislation to allow for parents to pre-designate guardians in the event of an adverse immigration action.<sup>70</sup> In communities around the nation, churches and other faith-based organizations are preparing to step in to house and care for children that would be taken in by child services after a parent is detained or deported.<sup>71</sup> But there is no guarantee that organizations like these can meet the demand.

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68. Karen Kasler, *Ohio agencies making plans to help kids of Haitians if TPS ends and ICE surges*, Statehouse News Bureau (Feb. 5, 2026), <https://perma.cc/Z3GN-QEXS>.

69. John Bedell & WHIO Staff, *I-TEAM: Child welfare system concerns loom with Haitian temporary legal status set to expire in days*, WHIO (Jan. 26, 2026), <https://perma.cc/2KPB-VS5K>.

70. See Mass. HB No. H5050, <https://perma.cc/9M4K-6W69>.

71. See, e.g., Amanda Becker, *Fear, faith and preparation as ICE closes in on an Ohio community*, 19th News (Feb. 2, 2026), <https://perma.cc/MKA6-ZMTD>.

The termination of TPS would also throw public school systems in jurisdictions with large TPS populations into chaos. Former TPS holders who choose to remain in the country without documentation may keep their children home from school to avoid attracting the attention of immigration enforcement, whether those children are U.S. citizens or not.<sup>72</sup> When students enrolled in our schools abruptly stop attending or come to school carrying the trauma of a parent losing legal status, the learning environment worsens for all students because of added stress and instability. Moreover, districts losing large numbers of TPS students may have to cut programming and staff as enrollment-based education funding dwindles.<sup>73</sup> When education suffers, the resulting harms can persist over decades.<sup>74</sup>

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72. See Matthew Lisiecki, Kevin Velasco & Tara Watson, *What will deportations mean for the child welfare system?*, Brookings & Ctr. for Migration Stud. (Apr. 22, 2025), <https://perma.cc/X5TL-MV2V>; Miriam Jordan, *Inside the Underground Safe Houses Sheltering Immigrants From ICE*, N.Y. Times (Mar. 3, 2026), <https://perma.cc/G4K3-AW2R> (teacher in Springfield, Ohio describes how after announcement of termination of TPS status for Haiti, “Teachers, employers, pastors, schools – we all witnessed the disappearance of members of our community.”).

73. For example, the Miami-Dade public school system expects that 4,000 students and over 30 staff members will be directly affected by the termination of TPS. Christina Vazquez, *How many public school students in Miami-Dade have connections to Haiti? We now know*, Local 10 News (Feb. 6, 2026), <https://perma.cc/ZEA4-S35H>. The district has already seen a drastic drop in the enrollment of foreign-born students, putting state and federal funding—which is dependent on enrollment—in jeopardy. *Id.*

74. See, e.g., Sofoklis Goulas, *Twelve facts about the economics of education*, Brookings (June 27, 2024), <https://perma.cc/285Q-B6V5>

These life-altering impacts on children and their families are clear harms to the public interest that weigh strongly against allowing the Government to proceed with its pre-determined termination of TPS status for Haiti, Syria, and other countries. Letting children (including numerous U.S. citizens) remain safely with their parents in their homes and communities is a far better alternative.

**B. Former TPS Holders Will Face Economic Vulnerability, Causing Downstream Strains on Local Public Health and Safety Nets**

If this Court allows the DHS Secretary’s termination of TPS status for Haiti and Syria to go into effect (and therefore also impact ongoing legal fights over terminations for other countries), *amici* expect that some TPS holders will nonetheless decide to stay in the U.S. despite the risk of deportation because of the circumstances in their home countries—including the ongoing humanitarian crisis in Haiti or the ongoing armed conflict in Syria—and because of their deep ties to family members and communities in the United States. If these residents do remain in this country, it will be without legal authorization to work—putting families at risk of poverty,

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(“Higher educational attainment is associated with higher earnings, longer productive lives, better physical and mental health, resilience and adaptability, and personal development and fulfillment . . . . [E]ducation is a catalyst for human and social capital development, driving long-term economic growth.”); Anna Zajacova & Elizabeth M. Lawrence, *The relationship between education and health: reducing disparities through a contextual approach*, 39 Ann. Rev. Pub. Health 273, 274 (2018) (“During the past several generations, education has become the principal pathway to financial security, stable employment, and social success.” (citation omitted)).

hunger, and homelessness and, ultimately, straining local safety nets. By one estimate, 25,000 children would be pushed into poverty without the income of their Haitian TPS holder parent.<sup>75</sup> Without work authorization, immigrants who do work are more likely to hold lower-paying jobs and will be more vulnerable to coercion and exploitation in the workplace.<sup>76</sup> Pushing entire segments of the TPS population into this precarious work situation will have rippling effects on local governments, who invest significant resources in combatting wage theft and other abusive employer practices, and who also fund and operate safety net services.<sup>77</sup>

Apart from these economic harms, ending TPS for Haiti in particular would also have profound and long-lasting consequences on public health and the healthcare system. Some county governments are frontline healthcare providers, operating public hospitals,

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75. *Haitian TPS Holders Make the U.S. Stronger*, *supra* n.8.

76. See Jennifer J. Lee, *Legalizing Undocumented Work*, 42 *Cardozo L. Rev.* 1893, 1905-1906 (2021) (describing the factors that make undocumented workers less likely to exercise their legal rights and employers more likely to exploit these workers); see also Mary Bauer & Mónica Ramírez, *Injustice on Our Plates*, S. Poverty L. Ctr. (2010), <https://perma.cc/S62J-E6DH> (describing labor abuses including wage theft, sexual harassment, and unsafe working conditions experienced by Latina women working in the food industry, in both fields and factories).

77. See Terri Gerstein & LiJia Gong, *The role of local government in protecting workers' rights*, Econ. Pol'y Inst., Harvard L. Sch. (June 13, 2022) (describing growing role of cities and localities in expanding and enforcing workers' rights, including through establishment of municipal departments dedicated to protecting workers), <https://perma.cc/KEF6-KSEQ>.

community health centers, and nursing homes. Not only could these care providers lose a significant portion of their workforce<sup>78</sup>—but *anyone* who loses TPS may avoid or delay their own medical care and medical care for their children. Parents may avoid healthcare settings for fear of attracting the attention of immigration enforcement.<sup>79</sup> As a result, citizen and non-citizen children could miss out on crucial preventative care, including vaccinations, health screenings, and wellness visits, making them more vulnerable to preventable diseases. Any increase in the rate of unvaccinated children would increase the risk of disease spread and even death from preventable childhood illnesses.<sup>80</sup> Avoiding preventive care and delaying treatment for both adults and children means that medical conditions will worsen and future costs borne by public hospitals will rise. There is also a significant risk to public health, as cases of contagious disease go undiagnosed, untreated, and unreported.<sup>81</sup>

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78. See, e.g., Jordan, *supra* n.26; Fernández, *supra* n.31; Rios, *supra* n.38; Bovill, *supra* n.51.

79. See Lisiecki et al., *supra* n.72.

80. Mathew V. Kiang et al., *Modeling Reemergence of Vaccine-Eliminated Infectious Diseases Under Declining Vaccination in the US*, 33 JAMA 2176 (2025) (predicting that “declining childhood vaccination rates will increase the frequency and size of previously eliminated vaccine-preventable infections,” with measles potentially becoming endemic even under current vaccination rates).

81. See, e.g., Steven Miles, *Hospitals are no place for ICE enforcement*, Minn. Star Trib. (Jan. 16, 2026), <https://perma.cc/CMV9-ZADK> (explaining the predicted negative impact of healthcare avoidance).

Forcing parents to choose between the risk of family separation and deportation to a highly dangerous country or to forgo healthcare for their children will harm entire communities.

### **III. AGGRESSIVE IMMIGRATION ENFORCEMENT AGAINST FORMER TPS HOLDERS WOULD THREATEN TO CAUSE RIPPLING HARMS IN *AMICI*'S COMMUNITIES**

If this Court were to decide that DHS's TPS terminations—for Haiti, Syria, and any other country—are beyond judicial review, the resulting immigration enforcement would cause irreparable injury. Specifically, over 335,000 TPS beneficiaries from Haiti and Syria, most of whom will have no avenue to maintaining legal status in the United States, would be transformed from legal residents to undocumented immigrants overnight—and immediately vulnerable to detention and ultimately deportation.<sup>82</sup> Indeed, the Government made clear when seeking a stay of the district court's order regarding the termination of TPS status for Haiti that it wants an order from this Court allowing “implementation [of the termination decision] [to] proceed as planned, allowing removal proceedings to begin. . . .” App. to Stay Order Issued by the U.S. Dist. Ct. for the Dist. of Columbia at 36, *Trump v. Miot*, No. 25-1084 (U.S. March 11, 2026). Presumably, *amici* cities that are home to substantial

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82. Indeed, news reports indicate that after terminating TPS for certain categories of Venezuelans in 2025, the Administration deported at least 13,000 former TPS beneficiaries back to Venezuela. See Michelle Gallardo, *Local advocates ask Trump admin. to reinstate Venezuelans' TPS, stop deportations amid uncertainty*, ABC Eyewitness News (Jan. 5, 2026), <https://perma.cc/7KBD-SR72>.

TPS populations would thus immediately see a surge of immigration enforcement.

Any surge in immigration enforcement against TPS holders from Haiti, Syria, and other nations in *amici*'s communities could have rippling harmful effects on our jurisdictions, as ICE and CBP operations across the country in the last year have made clear. ICE has demonstrated a recent pattern of using increasingly aggressive, often violent, immigration enforcement tactics.<sup>83</sup> In some cases ICE's tactics have led to serious physical injuries and death, to both the immigrants they detain and bystanders.<sup>84</sup> *Amici*, whose police departments must divert resources to respond when ICE enforcement surges produce demonstrations, have a strong interest in avoiding the overnight stripping of legal status from local residents. Moreover, across the country, news reports consistently document ICE taking race into consideration

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83. See, e.g., U.S. Senate, Permanent Subcomm. on Investigations, *Unchecked Authority: Examining the Trump Administration's Extrajudicial Immigration Detentions of U.S. Citizens* at 5, 17, 19, 30, 32–33, 35–36, 47–48, 53–57 (Dec. 9, 2025), <https://perma.cc/LTT9-S2DC> (hereinafter “U.S. Senate Report”); Thomas Fuller & Jazmine Ulloa, “Like a Military Occupation”: Clashes Rise with Federal Agents in Minneapolis, *N.Y. Times* (Jan. 13, 2026), <https://perma.cc/T3C6-7SMH>.

84. U.S. Senate Report, *supra* n.82; Michael Dorgan, *Renee Good was shot 4 times, including in the head, fire report shows*, *Fox News* (Jan. 16, 2026), <https://perma.cc/FK7S-4MMK>; Alyssa Chen & Max Nesterak, *Videos add new detail to 2nd Minneapolis ICE shooting in a week*, *Minn. Reformer* (Jan. 16, 2026), <https://perma.cc/R6TK-EMGR>; Ximena Bustillo & Rahul Mukherjee, *Immigration detention on track for deadliest fiscal year since 2004*, *NPR* (Mar. 10, 2026), <https://perma.cc/3TMS-4E7N>.

during immigration sweeps, detaining U.S. citizens and non-citizens alike based on perceived ethnicity.<sup>84</sup> If TPS ends for Haitians, Syrians, and other countries with majority non-white populations, U.S. citizens and lawful permanent residents of color will likely be at risk of deliberate targeting, possibly resulting in their detention by ICE.

Any federal immigration enforcement surge triggered by TPS terminations would also cause immediate damage to public safety in *amici*'s communities. As recent large-scale deployments of ICE agents to American cities have demonstrated, aggressive immigration enforcement campaigns diminish *amici*'s ability to prevent crime and maintain trust in local law enforcement. In cities facing ICE surges, police are pulled away from their other critical work not only when there are mass demonstrations that affect public spaces but also by hit-and-run accidents, and by calls from concerned residents because ICE's

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85. Nicole Foy, *We Found That More Than 170 U.S. Citizens Have Been Held by Immigration Agents. They've Been Kicked, Dragged and Detained for Days.*, ProPublica (Oct. 16, 2025), <https://perma.cc/4QVF-UW2G>; see also David J. Bier, *One in Five ICE Arrests Are Latinos on the Streets With No Criminal Past or Removal Order*, Cato Inst. (Aug. 5, 2025), <https://perma.cc/D3QS-DS9J> (demonstrating that in June and July 2025, ICE made nearly 9,000 street arrests of immigrants who had no criminal convictions, charges, or removal orders, and about 90 percent of them were immigrants from Latin America).

tactics resemble kidnappings.<sup>86</sup> What's more, as ICE deployments in Minneapolis, Los Angeles, and other cities have made clear, these operations can disrupt all aspects of daily life, causing children to miss school, businesses to be understaffed, and residents to sharply decrease shopping, eating out, and engaging in other commercial activity that local economies depend on.

Given the Government's express policy of pursuing mass deportations, any reversal (or stay) of the district courts' orders will likely lead to immediate, dire, and irreversible immigration consequences for the Haitian and Syrian TPS communities, and ultimately all residents with TPS. And *amici* and other cities where these immigrants call home will face immediate upheaval if large numbers of federal immigration enforcement officers descend on our jurisdictions.

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86. Alex Stone, *Los Angeles police responded to a kidnapping call. But instead found an ICE operation*, ABC News (June 25, 2025), <https://perma.cc/J2C5-ME2Q>; Nic Garcia & KJ Hiramoto, *ICE Agent Shoots at Car in California Standoff: Driver, [CBP] Agents Share Conflicting Accounts to Police*, FOX11 LA (Aug. 16, 2025), <https://perma.cc/5XAQ-ZXZA>; Angelique Brenes, *ICE agents detain mother in Pasadena in front of children without showing a warrant*, KTLA (June 28, 2025), <https://perma.cc/LD2L-7434>.

**CONCLUSION**

For these reasons, this Court should uphold the district courts' orders postponing the effective date of the DHS Secretary's TPS terminations for Haiti and Syria.

Respectfully submitted,

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## **APPENDIX**

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**APPENDIX — LIST OF *AMICI CURIAE***

**Local Governments**

County of Alameda, California

City of Albany, New York

City of Boston, Massachusetts

Boulder County, Colorado

City of Cambridge, Massachusetts

City of Chicago, Illinois

City of Cincinnati, Ohio

City of Columbus, Ohio

City and County of Denver, Colorado

City of Evanston, Illinois

City of Hartford, Connecticut

City of Los Angeles, California

County of Los Angeles, California

City of Minneapolis, Minnesota

City of Newark, New Jersey

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*Appendix*

City of New Haven, Connecticut

City of New York, New York

City of Portland, Oregon

City of Providence, Rhode Island

City of Rochester, New York

City of San Diego, California

County of San Diego, California

City and County of San Francisco, California

County of Santa Clara, California

City of Seattle, Washington

City of Somerville, Massachusetts

City of West Hollywood, California

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*Appendix*

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*Mayor, City of Boston, Massachusetts*

Moises Rodrigues  
*Mayor, City of Brockton, Massachusetts*

Aftab Pureval  
*Mayor, City of Cincinnati, Ohio*

Quinton Lucas  
*Mayor, City of Kansas City, Missouri*

Eileen Higgins  
*Mayor, City of Miami, Florida*

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*City Councilor, At-Large, Boston, Massachusetts*

Elizabeth Breadon  
*City Council President, District 9,  
Boston, Massachusetts*

Julia Mejia  
*City Councilor, At-Large, Boston, Massachusetts*

Henry Santana  
*City Councilor, At-Large, Boston, Massachusetts*

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*City Councilor, District 1, Boston, Massachusetts*

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*City Councilor, District 2, Boston, Massachusetts*

John FitzGerald

*City Councilor, District 3, Boston, Massachusetts*

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