

No. 25-1084

IN THE
Supreme Court of the United States

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

Petitioners,

v.

FRITZ EMMANUEL LESLY MIOT, *et al.*,

Respondents.

ON WRIT OF CERTIORARI TO THE UNITED STATES
COURT OF APPEALS FOR THE D.C. CIRCUIT

**BRIEF OF *AMICUS CURIAE*
SPRINGFIELD NEIGHBORS UNITED
IN SUPPORT OF RESPONDENTS**

KATHLEEN KERSH
Counsel of Record
RENEE MURPHY
RYAN DAVIS
TAYLOR FORD
ADVOCATES FOR BASIC
LEGAL EQUALITY, INC.
130 West Second Street,
Suite 700 East
Dayton, OH 45402
(419) 255-0814
kkersh@ablelaw.org

Attorneys for Amicus Curiae

132086



COUNSEL PRESS

(800) 274-3321 • (800) 359-6859

TABLE OF CONTENTS

	<i>Page</i>
TABLE OF CONTENTS.....	i
TABLE OF CITED AUTHORITIES	ii
INTERESTS OF <i>AMICUS CURIAE</i>	1
INTRODUCTION AND SUMMARY OF ARGUMENT.....	2
ARGUMENT.....	5
I. Before the Haitian Community Grew in Springfield, the City Faced Economic Decline and an Aging Workforce.....	6
II. Growth of the Haitian Population in Springfield Bolstered Economic, Civic, and Religious Life in the Community	7
III. Springfield Suffered Serious Harms in 2024 After Derogatory Comments About Haitians were Made on the National Debate Stage	13
IV. DHS’s Announcement to Terminate Haiti’s TPS Designation Fails to Consider the Interests of Communities Like Springfield and the Harm They Will Suffer	19
CONCLUSION	30

TABLE OF CITED AUTHORITIES

	<i>Page</i>
Cases	
<i>Motor Vehicle Mfrs. Assn. of United States, Inc. v. State Farm Mut. Auto. Ins. Co.</i> , 463 U.S. 29 (1983).....	4
Constitutional Provisions	
U.S. Const. amend. V	3
Statutes	
5 U.S.C. § 706(2).....	3
8 U.S.C. § 1254a(a)(1)(B).....	8
8 U.S.C. § 1254a(b)(5)(A)	3, 30
Regulations	
86 Fed. Reg. 41863 (Aug. 3, 2021)	8
88 Fed. Reg. 5022 (Jan. 26, 2023)	8
89 Fed. Reg. 54484 (July 1, 2024)	8
90 Fed. Reg. 45736	4
90 Fed. Reg. 54733 (Nov. 28, 2025)	4

Cited Authorities

Page

Other Authorities

- Tom Archdeacon, *Archdeacon: They didn't share a language, but they shared a jersey—and that was enough*, DAYTON DAILY NEWS (Feb. 15, 2026), <https://www.daytondailynews.com/sports/archdeacon-they-didnt-share-a-language-but-they-shared-a-jersey-and-that-was-enough/U5I4574G5VCDVFZLN2H6LTVM2U/>24
- Daniel Arkin and David Ingram, *Trump pushes baseless claim about immigrants 'eating the pets'*, NBC NEWS (Sep. 10, 2024), <https://www.nbcnews.com/politics/2024-election/trump-pushes-baseless-claim-immigrants-eating-pets-renal70537>13
- Uri Berliner, *Springfield, Ohio: A Shrinking City Faces A Tough Economic Future*, NPR (Sep. 19, 2016), <https://www.npr.org/2016/09/19/493920060/springfield-ohio-a-09/19/493920060/springfield-ohio-a-future>6, 7
- Josh Bivens, *The U.S.-Born Labor Force Will Shrink Over the Next Decade* (Econ. Policy Inst., Oct. 5, 2025), <https://www.epi.org/publication/the-u-s-born-labor-force-will-shrink-over-the-next-decade-achieving-historically-normal-gdp-growth-rates-will-be-impossible-unless-immigration-flows-are-sustained/>6, 7

Cited Authorities

	<i>Page</i>
Jenilee Borek, <i>NAACP town hall in Springfield tackles immigration enforcement concerns</i> , DAYTON 24/7 NOW (Dec. 9, 2025), https://dayton247now.com/news/local/naacp-town-hall-in-springfield-tackles-immigration-concerns	20
Faith Bosland, Photograph of Springfield High School Men’s Soccer Team (2025)	25
Ted Brown, <i>Springfield cancels annual downtown culture festival</i> , WDTN (Sep. 16, 2024 9:13 AM, posted), https://www.wdtn.com/news/local-news/springfield-cancels-annual-downtown-culture-festival/	16
Jennifer Casto, Photograph of Blood Tribe with Swastika Flags in Front of Springfield City Hall (2024)	15
City Manager, City of Springfield, <i>City Manager’s 2026 Preliminary Budget</i> (Nov. 1, 2025), https://springfieldohio.gov/city-managers-2026-preliminary-budget/	21
City of Springfield, <i>Immigration FAQs</i> (n.d), https://springfieldohio.gov/immigration-faqs/	17

Cited Authorities

	<i>Page</i>
Office of Governor Mike DeWine, <i>Governor DeWine Sends Ohio State Highway Patrol to Provide Added Security in Springfield City School District</i> (Sep. 16, 2024), https://governor.ohio.gov/wps/portal/gov/governor/media/news-and-media/governor-dewine-sends-ohio-state-highway-patrol-to-provide-added-security-in-springfield-city-school-district	16
Cornelius Frolik, <i>Springfield has the worst job losses in Ohio: Haiti TPS ending could make it worse</i> , SPRINGFIELD NEWS-SUN (Feb. 3, 2026) https://www.springfieldnewssun.com/local/springfield-has-the-worst-job-losses-in-ohio-haiti-tps-ending-could-make-it-worse/ZCHAYTVFC5EFLCS6QJQTHV3NEI/	22
Jasmine Garsd, <i>How Springfield, Ohio, took center stage in the election immigration debate</i> , NPR (Aug. 12, 2024, 5:34 PM), https://www.npr.org/2024/08/12/nx-s1-5055784/immigration-vance-trump-migration-president-migrants-election-ohio	9, 13
Jasmine Garsd, <i>The stereotype of immigrants eating dogs and cats is storied – and vitriolic as ever</i> , NPR (Sep. 11, 2024), https://www.npr.org/2024/09/11/nx-s1-5108401/donald-trump-debate-eating-dogs-cats-immigrants-false-stereotype	13

Cited Authorities

	<i>Page</i>
<i>Haitian TPS Holders Make the U.S. Stronger</i> , FWD.US (Jan. 22, 2026), https://www.fwd.us/news/haitian-tps-holders-make-the-u-s-stronger/	10
Miriam Jordan, <i>How an Ohio Town Landed in the Middle of the Immigration Debate</i> , THE N.Y. TIMES (Sep. 3, 2024), https://www.nytimes.com/2024/09/03/us/springfield-ohio-school-bus-crash-haiti-immigrants.html . . .	9, 22
Hasan Karim, <i>New grocery now serving Springfield residents in former food desert</i> , Springfield News-Sun (Dec. 19, 2021), https://www.springfieldnewssun.com/news/new-springfield-grocery-serving-residents-in-former-food-desert-opens-its-doors/55QU7QOALBC73PERDALKYSPKPA/ . . .	23
Danae King, <i>Haitians bring growth, challenges and unwanted attention to Springfield</i> , THE COLUMBUS DISPATCH (Feb. 17, 2026, 3:05 PM), https://www.dispatch.com/story/news/regional/2026/02/17/springfield-residents-say-haitian-population-growth-brought-challenges/88530100007/	10
Legislative Budget Off. of LSC, Ohio Legislative Serv. Comm’n, <i>Foster Care in Ohio</i> (Apr. 2024), https://www.lsc.ohio.gov/assets/organizations/legislative-service-commission/files/foster-care-in-ohio.pdf	27

Cited Authorities

	<i>Page</i>
Obed Manuel, <i>Bomb threats followed Trump’s false claims about Springfield. Some Haitians may leave</i> , NPR (Sep. 19, 2024, 11:52 AM), https://www.npr.org/2024/09/19/nx-s1-5114047/springfield-ohio-haitian-migrants-trump-safety-concerns	15
Meredith McGraw, <i>Trump camp touts cat memes</i> , POLITICO (Sep. 10, 2024, 8:19 PM), http://www.politico.com/live-updates/2024/09/10/trump-harris-presidential-debate-tonight/trump-campaign-cat-memes-00178422	13
Midwest Info. Ctr., US Bureau of Labor Statistics, <i>Springfield</i> (Mar. 2026). https://www.bls.gov/regions/midwest/oh_springfield_msa.htm	17
Russell Mills and Brett Huettner, <i>Postpandemic Employment Recovery in Fourth District Metro Areas</i> , FED. RESERVE BANK OF CLEVELAND: CLEVELAND FED DIST. DATA BRIEF, (January 15, 2025), https://doi.org/10.26509/frbc-ddb-20250115	11
Kathryn Mobley and Kaitlyn Schroeder, <i>Springfield buildings given all clear after bomb threat, including two schools</i> , WYSO (Sep. 12, 2024, 10:40 AM), https://www.wyso.org/news/2024-09-12/bomb-threat-issued-to-multiple-locations-in-springfield	15, 16

Cited Authorities

	<i>Page</i>
Ismael David Mujahid, <i>Haitian-owned business faces closure as immigrants flee Springfield</i> , SPRINGFIELD NEWS-SUN (Jan. 31, 2026), https://www.springfieldnewssun.com/local/haitian-owned-business-faces-closure-as-immigrants-flee-springfield/JFXULISDYNE63LHYQDM2XDL37I/	23, 24
Jessica Orozco, <i>3 Springfield houses of worship receive bomb threats</i> , SPRINGFIELD NEWS-SUN (Feb. 11, 2026), https://www.springfieldnewssun.com/news/2-springfield-churches-receive-bomb-threats/L5VDGXYNDVA6RIN5IMKKPITLSE/	20
Jessica Orozco, <i>Bomb threats continue, state supporting Springfield safety forces</i> , SPRINGFIELD NEWS-SUN (Feb. 11, 2026), https://www.springfieldnewssun.com/news/bomb-threats-continue-state-supporting-springfield-safety-forces/2YS4XDRUJ5HRHDLFSH4VJZB56Y/ ...	20
Jessica Orozco, <i>Parents of child killed in bus crash don't want son associated with 'hate' at city meetings</i> , SPRINGFIELD NEWS-SUN (Oct. 12, 2023), https://www.springfieldnewssun.com/news/parents-of-child-killed-in-bus-crash-dont-want-son-associated-with-hate-at-city-meetings/54CNPTO6JFESHJB5CUK4M4NW64/	11, 15

Cited Authorities

	<i>Page</i>
Jessica Orozco, <i>Springfield braces for 30-day targeted ICE surge after Haitian TPS ends</i> , SPRINGFIELD NEWS-SUN (Jan. 27, 2026), https://www.springfieldnewssun.com/news/springfield-braces-for-30-day-targeted-ice-surge-next-week-as-haitian-tps-ends/L6425QVWEFFGLAKHHRYHYJ3WEM/	19
Jessica Orozco, <i>UPDATE: 3 grocery stores evacuated in Springfield reopen</i> , SPRINGFIELD NEWS-SUN (Sep. 18, 2024), https://www.springfieldnewssun.com/news/at-least-2-grocery-stores-evacuated-in-springfield/UBNKF5KRXZCH3LY4N7H7RLLIOY/	16
Alex Perry, <i>Ohio Gov. DeWine criticizes Trump plan to end TPS for Haitian immigrants</i> , USA TODAY (Feb. 23, 2026, 2:48 PM), https://www.usatoday.com/story/news/politics/2026/02/23/ohio-mike-dewine-criticize-donald-trump-tps-haitian-immigrants-springfield/88829907007/	9, 23
Carl Ruby, <i>Photograph of Sign Hung on Window of Central Christian Church</i> (2024)	26
Matt Sanctis, <i>5 things to know about Kroger’s move to close a Springfield store</i> , SPRINGFIELD NEWS-SUN (Aug. 2, 2018), https://www.springfieldnewssun.com/news/local/things-know-about-kroger-move-close-springfield-store/a8CF9jZq5MfdvtNGluPSwI/	23

Cited Authorities

Page

Matt Sanctis, *Springfield Target to close Saturday night*, SPRINGFIELD NEWS-SUN (Jan. 16, 2016), <https://www.springfieldnewssun.com/news/local/target-close-springfield-store-this-weekendRrPZ4RTq8LvMU052vy3bZO/>23

Howard Schneider, *How Haitian immigrants fueled Springfield’s growth*, REUTERS (Sep. 11, 2024), <https://www.reuters.com/world/us/haitian-immigrants-fueled-springfields-growth-now-us-presidential-debate-2024-09-11/>.....6, 7, 10

Brooke Spurlock and Stephen Starr, *What Springfield’s Haitian immigrants need*, SPRINGFIELD NEWS-SUN (Sept. 20, 2024), <https://www.springfieldnewssun.com/local/what-springfields-haitian-immigrants-need/JECTYAAFNFJFQXCHJM2BOXX4ZZU/>12

Brooke Spurlock, *Clark County approves \$230M annual budget*, SPRINGFIELD NEWS-SUN (Dec. 24, 2025, updated Apr. 6, 2026), https://www.springfieldnewssun.com/news/clark-county-approves-230m-annual-budget/article_7f350334-c57a-56fa-861f-53eafbd68107.html.....21

Cited Authorities

	<i>Page</i>
Stephen Starr, <i>Despite TPS stay, thousands of Haitians in Ohio face uncertainty and fear of ICE: Springfield businesses are closing and families are making contingency plans for their children</i> , THE GUARDIAN (Feb. 3, 2026), https://www.theguardian.com/us-news/2026/feb/03/ohio-ice-raids-haitian-community . . .	9, 27
Stephen Starr, <i>Haitian immigrants flee Springfield, Ohio, in droves after Trump election win</i> , THE GUARDIAN (Nov. 17, 2024), https://www.theguardian.com/us-news/2024/nov/17/haitian-immigrants-springfield-ohio-trump-election . . .	17
Stephen Starr, <i>The desperate drive to secure passports for thousands of US-born Haitian kids – before it’s too late</i> , THE GUARDIAN (Jul. 4, 2025), https://www.theguardian.com/us-news/2025/jul/04/passports-haitian-kids-tps-trump-administration . . .	27
Nicole Valdes, <i>Fearing deportation, some Haitian migrants leaving Springfield, Ohio</i> , CBS NEWS (Nov. 22, 2024), https://www.cbsnews.com/news/fearing-deportation-some-haitian-migrants-leaving-springfield-ohio/ . . .	17

Cited Authorities

	<i>Page</i>
Karen Weintraub, Deborah Barfield Berry, and Lauren Villagran, <i>Immigrants-eat-pets trope is a century-old stereotype and ‘very old racism’</i> , USA Today (Sep. 12, 2024, 1:01 PM), https://www.usatoday.com/story/news/politics/elections/2024/09/12/immigration-pets-historic-trope/75183935007/	13
Judy Woodruff, <i>How Springfield and its Haitian immigrants are still dealing with election’s spotlight</i> , PBS NEWS HOUR (Apr. 23, 2025), https://www.pbs.org/newshour/show/how-springfield-and-its-haitian-immigrants-are-still-dealing-with-elections-spotlight	18
Odette Yousef, <i>In parroting a lie about migrants in Springfield, Ohio, Trump excites extremists</i> , NPR (Sep. 24, 2024, 4:21 PM), https://www.npr.org/2024/09/24/nx-s1-5118438/neo-nazi-haitian-springfield-trump-debate . . .	14

INTERESTS OF *AMICUS CURIAE*

Amicus Curiae Springfield Neighbors United (“SNU”)¹ is an unincorporated group of Springfield, Ohio residents and residents from surrounding communities. SNU is comprised of volunteers guided by “Love Your Neighbor” values, caring for people in Springfield and Clark County so that all may thrive. Born out of concern for their immigrant neighbors, SNU works with those whose dignity, safety, and access to justice are threatened, including communities facing discrimination and other challenges.

SNU consists of over four hundred local resident volunteers. It is the largest local community-based association serving the Haitian community in Springfield. Its members share values of community service and volunteerism. Since 2024, SNU has provided support to the Haitian community by scheduling welcoming events and distributing food, clothing, and other items to Haitians and other Springfield residents living in poverty.

SNU has a strong interest in this case. SNU is located in Springfield, the heart of the national debate about Haitian immigration and the Temporary Protected Status designation and termination. The experiences of its members reflect the impact that Haitian TPS holders have on small cities in rural counties suffering from economic decline. SNU faces grave harm if termination

1. No counsel for a party authored this brief in whole or in part, and no one other than *Amicus Curiae*, its members, or its counsel made a monetary contribution intended to fund this brief’s preparation or submission.

moves forward absent reasoned decision making by the Secretary of Homeland Security. SNU's membership is comprised of residents who have personally benefited from the economic contributions, education, friendships, and faith community membership of Springfield's Haitian TPS holders. Further, SNU's membership and the surrounding community have been directly harmed by the racially charged comments made by the administration before and around its decision to terminate the Haiti TPS designation. SNU members and their community have received multiple threats of violence as recently as February 2026. As such, SNU members stand to suffer economic, interpersonal, and even physical harm if Haiti's TPS designation is terminated.

As this Court assesses whether DHS properly considered statutorily mandated criteria and was motivated by unlawful discriminatory animus in its decision to terminate Haiti's TPS designation, SNU hopes this Court will consider the harm not only caused to Haitians currently protected by TPS, but the significant economic and cultural benefits the Haitian community has brought to Springfield, and the harm communities like Springfield have and will surely suffer if Haitians lose TPS.

INTRODUCTION AND SUMMARY OF ARGUMENT

Springfield, Ohio's recent cultural vibrancy and economic upturn, after a long period of decline, is widely attributed to its growing Haitian population, many of whom hold Temporary Protected Status ("TPS.") A small city located in west central Ohio, Springfield's

economy, workforce numbers, and tax base were declining until approximately ten to fifteen thousand Haitians decided to make the city their home. The vast majority of Springfield's Haitian community entered lawfully through humanitarian parole and remained lawfully through multiple re-designations of TPS by the U.S. Department of Homeland Security (DHS) in response to rampant, widespread, and deadly violence plaguing Haiti. Integration of the Haitian community was quick, bringing challenges as well as many new opportunities. Longtime residents and communities of faith seized those opportunities to welcome the stranger and revitalize their community. Economic and population growth followed, bringing new neighbors, faith communities, tax revenue, workforce numbers, and dedicated learners into the city.

The story of Springfield exemplifies what American communities stand to lose if this Court finds 8 U.S.C. § 1254a(b)(5)(A) precludes Respondents' claims under the Administrative Procedures Act ("APA") and the Fifth Amendment's guarantee of equal protection from discrimination, and finds that their claims fail on the merits. *See* U.S. Const. amend. V, 5 U.S.C. § 706(2). *Amicus* is an unincorporated association of Springfield community members who serve and support their Haitian neighbors through a variety of programs. *Amicus* representatives Pastor Carl Ruby, Catherine Peyroux, and former Clark County Commissioner Melanie Wilt present their stories of the positive impact of Haiti's Temporary Protected Status designation on their community. *Amicus* details ways in which the entire city has benefited economically from increased tax revenue, business growth, and resulting improvements in the local economy attributed to the Haitian community. They explain the contributions

Haitian TPS holders have made to faith communities and how schools have benefited. They explain why, despite ongoing threats of violent pushback by white supremacist groups, Haitians' ability to live peacefully in Springfield is so important to their community, as an example of real-world national interests.

Petitioners' decision to terminate the designation of TPS for Haiti was nominally based, in part, on economic considerations, including effects on U.S. workers and the "impact [of Haitian TPS holders] on U.S. communities." 90 Fed. Reg. 54733, 54735 (Nov. 28, 2025). The Secretary stated, without evidence, that visa overstayers of Haitian national origin can "place an added strain on local communities by increasing demand for public resources, contributing to housing and healthcare pressures, and competing in an already limited job market." *Id.* at 45736 (not providing evidence that Haitian TPS holders, who are a different population, have such impacts). Yet then-Secretary Noem made this determination without evidencing any consideration of actual experiences of local communities, like Springfield, that Haitian TPS holders call home. See *Motor Vehicle Mfrs. Assn. of United States, Inc. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983) (Petitioners' process must be reasoned decision making, considering important aspects of the issue and showing rational connections between facts found and the decision). Petitioners' decision not to consider the positive economic, social, faith community, and other impacts of Haitian TPS holders in communities like Springfield was not well reasoned, as evidenced by all the experiences and data discussed in this brief.

Amicus writes to account for the many ways in which Haitian TPS holders have benefited the Springfield community by boosting the economy, contributing to the workforce, and stimulating business development. *Amicus* recounts the way in which all Springfield community members—including non-Haitians—have suffered from the discriminatory comments made during the 2024 presidential debate and preceding the TPS termination announcement. Finally, *Amicus* details how DHS’s plans to conduct mass immigration arrests after the Haiti TPS designation terminates have already threatened the safety of the entire Springfield community.

ARGUMENT

Amicus documents Springfield’s trajectory as a community that is home to many Haitian TPS holders. *Amicus* offers its account as insight into Haitian TPS holders’ importance to communities, like Springfield, whose interests benefit economically, culturally, and personally from Haitian TPS holders. This brief recounts the harms visited on the community since national political attention, based in animus, was drawn to Springfield because of its integration of Haitian people. *Amicus* explains the harm that has and will befall Springfield if Haiti’s TPS designation is terminated and ICE makes good on their threats to use Springfield as another example of its mass immigration enforcement capability. The stories of *Amicus* representatives and the perspective of this community that has unwillingly been at the center of the national debate on Haitian migration clearly show the serious consequences that will befall Springfield and American communities like it if TPS is terminated as part of a broader anti-Haitian campaign fueled by racially-

charged rhetoric. The devastation that will result in Springfield and its Haitian community if TPS ends without Petitioners following the statutorily-mandated procedures is great, and will surely threaten the positive social, economic, and cultural impacts the Haitian community has had on Springfield.

I. Before the Haitian Community Grew in Springfield, the City Faced Economic Decline and an Aging Workforce

Population and economic declines were Springfield, Ohio's trajectory. Springfield is a city in west central Ohio, about 45 miles west of Columbus. A former manufacturing hub planned to accommodate 80,000-90,000 people, Springfield's population began to decline in the 1970s as younger residents left the city for educational opportunities and to join the military.² Amicus Br. App. 23a-24a ¶¶ 5-6. The flight of young residents resulted in an aging and shrinking workforce. By 2016, Springfield's population had become older than the national average, skewed toward a demographic group less likely to participate in the labor market.³

2. Uri Berliner, *Springfield, Ohio: A Shrinking City Faces A Tough Economic Future*, NPR (Sep. 19, 2016), <https://www.npr.org/2016/09/19/493920060/springfield-ohio-a-shrinking-city-faces-a-tough-economic-future>; Howard Schneider, *How Haitian immigrants fueled Springfield's growth*, REUTERS (Sep. 11, 2024), <https://www.reuters.com/world/us/haitian-immigrants-fueled-springfields-growth-now-us-presidential-debate-2024-09-11/>.

3. Berliner, *supra* note 2; see Josh Bivens, *The U.S.-Born Labor Force Will Shrink Over the Next Decade* (Econ. Policy Inst., Oct. 5, 2025), <https://www.epi.org/publication/the-u-s-born-labor-force-will-shrink-over-the-next-decade-achieving-historically->

As the population shrank, retailers and employers left the community. In 2018, the neighborhood Kroger grocery store closed on the south side of Springfield. Residents struggled to find local options to purchase necessities such as diapers or fresh produce. Amicus Br. App. 16a ¶ 8. As employers continued to leave, opportunities to earn a living decreased. As a result, the median income of residents in Springfield fell by twenty-seven percent between 1999 and 2014, more than any other metropolitan area in the country.⁴

By 2020, the city’s population had declined to approximately 58,000 residents.⁵ Springfield and Clark County were “in a mode of trying not to lose more, and clawing [their] way to keep what [they] had.” Amicus Br. App. 24a ¶ 7. Efforts to attract new employers and execute major city projects were thwarted in large part by the COVID pandemic. *Id.* The projects that did survive the pandemic and created new jobs had trouble finding workers to fill those jobs. *Id.* 24a ¶ 8. Springfield lacked the workforce and tax revenue necessary to revitalize the city economically.

II. Growth of the Haitian Population in Springfield Bolstered Economic, Civic, and Religious Life in the Community

Haitian community members first began arriving in Springfield in larger numbers around 2021. Amicus Br.

normal-gdp-growth-rates-will-be-impossible-unless-immigration-flows-are-sustained/.

4. Berliner, *supra* note 2.

5. Schneider, *supra* note 2.

App 2a-3a ¶ 5. A small Haitian community already existed in the city, as did initiatives like Welcome Springfield to welcome immigrants. *Id.* 2a-3a ¶¶ 5-6. Despite the many rumors of nefarious reasons existing to draw Haitians to Springfield, *Amicus* believes that Haitians came to Springfield because there were employment opportunities and they thought “it would be a safe community to live and raise their families.” *Id.* 3a ¶ 6. Once some Haitians arrived in Springfield and felt welcomed, word quickly began to spread in the Haitian community. Then, others traveled to Springfield to be with their friends and family. *Id.*

The vast majority of Haitians who settled in Springfield came to the United States through lawful means, typically through a grant of humanitarian parole, and thus were authorized to work lawfully in the United States. 8 U.S.C. § 1254a(a)(1)(B). As parole ended, many Haitians maintained work authorization by applying for Temporary Protected Status after the 2021, 2023, and 2024 redesignations. *See* 86 Fed. Reg. 41863 (Aug. 3, 2021); 88 Fed. Reg. 5022 (Jan. 26, 2023); 89 Fed. Reg. 54484 (July 1, 2024).

As the Haitian community grew and integrated into Springfield, so did their contributions to the local economy. Many Haitians worked in metal working, food processing, healthcare, distribution, and automobile parts manufacturing. *Amicus Br. App 5a ¶ 13.* Employers told declarant Dr. Carl Ruby, senior pastor at Springfield’s Central Christian Church and a founding member of *Amicus*, that Haitian workers were extremely valuable to businesses, accepting extra hours and easily passing

required drug tests.⁶ *Id.* Governor of Ohio Mike DeWine has accurately stated that employers were able to fill jobs with Haitian workers that would not have been filled before.⁷ Contrary to the unsupported insinuations of Petitioners regarding TPS holders' impact on local job seekers, a local Springfield business owner said, from personal experience, "I think this whole notion of migrants taking American jobs is hogwash."⁸ Haitians opened businesses, including restaurants, markets, real estate agencies, and in-home healthcare agencies.⁹

Springfield quickly began to benefit economically from the choice Haitians made to settle and work there. Residents benefited from a drastic increase in property

6. A local business owner and coworker also commented positively on Haitian workers to the New York Times. Miriam Jordan, *How an Ohio Town Landed in the Middle of the Immigration Debate*, THE N.Y. TIMES (Sep. 3, 2024), <https://www.nytimes.com/2024/09/03/us/springfield-ohio-school-bus-crash-haiti-immigrants.html>.

7. Alex Perry, *Ohio Gov. DeWine criticizes Trump plan to end TPS for Haitian immigrants*, USA TODAY (Feb. 23, 2026, 2:48 PM), <https://www.usatoday.com/story/news/politics/2026/02/23/ohio-mike-dewine-criticize-donald-trump-tps-haitian-immigrants-springfield/88829907007/>.

8. Jasmine Garsd, *How Springfield, Ohio, took center stage in the election immigration debate*, NPR (Aug. 12, 2024, 5:34 PM), <https://www.npr.org/2024/08/12/nx-s1-5055784/immigration-vance-trump-migration-president-migrants-election-ohio>.

9. Stephen Starr, *Despite TPS stay, thousands of Haitians in Ohio face uncertainty and fear of ICE: Springfield businesses are closing and families are making contingency plans for their children*, THE GUARDIAN (Feb. 3, 2026), <https://www.theguardian.com/us-news/2026/feb/03/ohio-ice-raids-haitian-community>.

values and from renovations of neglected properties that followed the population increase. Amicus Br. App. 18a ¶ 12. Restaurants, a co-working space, shops, and a market have opened in recent years, bringing vibrancy to downtown Springfield.¹⁰ Haitian TPS holders contributed an estimated \$91 million per year to the local economy of Springfield, and Haitian TPS holders in Ohio contributed \$21 million in annual state and local taxes.¹¹ The tax revenue from all this economic activity provided funds for road and school system improvements. *Id.* 17a-18a ¶ 11.

Economic contributions associated with the Haitian community's growth in Springfield made positive impacts on the local workforce. Wages increased by six percent in Springfield in both 2022 and 2023, the period of increase lasting about twice as long as the national average.¹² This two-year period coincides with periods of rapid growth of the Haitian population in Springfield. Federal Reserve Bank of Cleveland analysts found that Springfield area's employment growth rate 2020 through March 2024 was the second-highest for small cities in its region (2.3%), at a time when other small Ohio metro areas without the same growth in Haitian TPS holder population, Mansfield and

10. Danae King, *Haitians bring growth, challenges and unwanted attention to Springfield*, THE COLUMBUS DISPATCH (Feb. 17, 2026, 3:05 PM), <https://www.dispatch.com/story/news/regional/2026/02/17/springfield-residents-say-haitian-population-growth-brought-challenges/88530100007/>.

11. *Haitian TPS Holders Make the U.S. Stronger*, FWD.US (Jan. 22, 2026), <https://www.fwd.us/news/haitian-tps-holders-make-the-u-s-stronger/>.

12. Schneider, *supra* note 2.

Lima, actually experienced job declines (-.3% and -1%, respectively).¹³

As with any population shift, this increase in residents placed initial stress on city services. The local school system needed to adapt to increased enrollment numbers and required training on working with students for whom English was not their first or academic language. *Amicus Br. App. 17a ¶ 10*. There were concerns about stress on city infrastructure, healthcare, housing availability, and the impact on public benefits availability for the existing population. *Id. 5a-6a ¶ 14, 25a ¶ 12*.

In 2023, a young boy, Aiden Clark, was killed in a school bus accident caused by a Haitian driver who crossed the center line of the road. The city was grief-stricken. Some residents blamed the entire Haitian community for the horrific consequences of one man's driving. There were several heated city commission meetings where some residents made racially-charged comments. *Amicus Br. App. 4a ¶ 9*. These comments activated residents like Pastor Dr. Carl Ruby. Pastor Ruby and other Springfield community leaders galvanized around the Haitian community. Pastor Ruby and others knew Springfield “would not stand for this kind of hate.” *Id. 4a ¶ 10*.¹⁴

13. Russell Mills and Brett Huettner, *Postpandemic Employment Recovery in Fourth District Metro Areas*, FED. RESERVE BANK OF CLEVELAND: CLEVELAND FED DIST. DATA BRIEF, (January 15, 2025), <https://doi.org/10.26509/frbc-ddb-20250115>.

14. Jessica Orozco, *Parents of child killed in bus crash don't want son associated with 'hate' at city meetings*, SPRINGFIELD NEWS-SUN (Oct. 12, 2023), <https://www.springfieldnewssun.com/news/parents-of-child-killed-in-bus-crash-dont-want-son->

Remarkably, city and county officials and many residents of Springfield, including members of *Amicus*, G92, and other community coalitions, turned inward to meet these challenges. They saw an opportunity to welcome new residents and the chance to revitalize Springfield. Community leaders formed the Clark County Haitian Coalition, where service providers and community leaders met every month to discuss ways to best serve Clark County residents, including Haitians.¹⁵ Rocking Horse Clinic, the local Federally Qualified Health Center, hired Haitian Creole interpreters to serve its growing Haitian patient population. Many of these interpreters were Haitian physicians living in Springfield who were unable to practice medicine because their medical licenses would not transfer. *Amicus* Br. App. 5a-6a ¶ 14. The Springfield Police Division Chief regularly attended Haitian community events, recognizing the need to build trust with Haitian leaders. *Id.* The Springfield City School District hired new English for Speakers of Other Languages (ESOL) teachers. It started an ESOL literacy initiative that benefited the entire diverse test classroom and helped teachers learn new skills. *Id.* 18a ¶ 13. The city even hosted a Haitian Flag Day celebration in the park downtown. *Id.* 6a ¶ 15. By late summer 2024, the community in Springfield “had really gotten a handle” on the challenges they originally faced when the Haitian community first arrived. *Id.* 5a-6a ¶ 14.

associated-with-hate-at-city-meetings/54CNPT06JFESHJB5C
UK4M4NW64/.

15. Brooke Spurlock and Stephen Starr, *What Springfield’s Haitian immigrants need*, SPRINGFIELD NEWS-SUN (Sept. 20, 2024), <https://www.springfieldnewssun.com/local/what-springfields-haitian-immigrants-need/JECTYAAFNFQXCHJM2BOXX4ZZU/>.

III. Springfield Suffered Serious Harms in 2024 After Derogatory Comments About Haitians were Made on the National Debate Stage

On September 10, 2024, then-presidential candidate Donald Trump promoted a dehumanizing rumor about Haitians in Springfield eating cats and dogs owned by other city residents in a national, televised debate. This was not the first time a candidate had mentioned this false rumor as part of a larger anti-immigrant message: then-senator and vice-presidential candidate JD Vance invoked the Haitian community in Springfield in speeches promoting anti-immigrant policies.¹⁶ However, the elevation of the vicious rumors about Haitians consuming pets to the national debate stage held immense consequences for the entire Springfield community, causing a “trauma” from which the community has still not recovered. Amicus Br. App. 12a ¶ 33.

16. Their comments were extensively reported, including Garsd, *supra* note 8; Meredith McGraw, *Trump camp touts cat memes*, POLITICO (Sep. 10, 2024, 8:19 PM), <http://www.politico.com/live-updates/2024/09/10/trump-harris-presidential-debate-tonight/trump-campaign-cat-memes-00178422>; Daniel Arkin and David Ingram, *Trump pushes baseless claim about immigrants ‘eating the pets’*, NBC NEWS (Sep. 10, 2024), <https://www.nbcnews.com/politics/2024-election/trump-pushes-baseless-claim-immigrants-eating-pets-rcna170537>; Jasmine Garsd, *The stereotype of immigrants eating dogs and cats is storied – and vitriolic as ever*, NPR (Sep. 11, 2024), <https://www.npr.org/2024/09/11/nx-s1-5108401/donald-trump-debate-eating-dogs-cats-immigrants-false-stereotype>; and Karen Weintraub, Deborah Barfield Berry, and Lauren Villagran, *Immigrants-eat-pets trope is a century-old stereotype and ‘very old racism’*, USA TODAY (Sep. 12, 2024, 1:01 PM), <https://www.usatoday.com/story/news/politics/elections/2024/09/12/immigration-pets-historic-trope/75183935007/>.

These derogatory and dehumanizing comments about Springfield's Haitian community thrust the *entire* Springfield community onto the national scene to answer for the very comments that had offended them. White supremacist groups like the Proud Boys, the Aryan Freedom Network, and the Blood Tribe descended on Springfield, marching in the streets.¹⁷ Amicus Br. App. 7a ¶ 19. Countless bomb threats were called into city offices, schools, and local businesses. Threats were aimed at Springfield residents of all backgrounds who were seen to have supported the Haitian community in some manner. A city official and a business leader endured death threats and threats to rape and kill their family members. *Id.* Pastor Carl Ruby also received death threats. Central Christian Church, where Ruby serves as senior pastor, was vandalized. *Id.* 8a ¶ 21.

17. Odette Yousef, *In parroting a lie about migrants in Springfield, Ohio, Trump excites extremists*, NPR (Sep. 24, 2024, 4:21 PM), <https://www.npr.org/2024/09/24/nx-s1-5118438/neo-nazi-haitian-springfield-trump-debate>.



18

The city endured tremendous disruption. Bomb threats on September 12, 2024 caused emergency evacuations of multiple city, school, and county buildings.¹⁹ Local government entities received at least thirty-three bomb threats from September 12 through 16, 2024.²⁰ While none of the bomb threats came to fruition, authorities were

18. Jennifer Casto, Photograph of Blood Tribe with Swastika Flags in Front of Springfield City Hall (2024) (on file with author).

19. Kathryn Mobley and Kaitlyn Schroeder, *Springfield buildings given all clear after bomb threat, including two schools*, WYSO (Sep. 12, 2024, 10:40 AM), <https://www.wyso.org/news/2024-09-12/bomb-threat-issued-to-multiple-locations-in-springfield>.

20. Obed Manuel, *Bomb threats followed Trump's false claims about Springfield. Some Haitians may leave*, NPR (Sep. 19, 2024, 11:52 AM), <https://www.npr.org/2024/09/19/nx-s1-5114047/springfield-ohio-haitian-migrants-trump-safety-concerns>.

required to investigate them, heightening fear in the Springfield community tremendously. The city canceled the local late-September CultureFest, and several grocery stores temporarily evacuated and closed.²¹ Schools closed because of a series of bomb threats, and Ohio Governor DeWine sent state troopers to provide additional security; this disrupted all children’s education.²² Amicus Br. App. 7a ¶ 19. Students of all races and backgrounds disappeared from school for weeks because parents were so afraid to send their children to school. Amicus Br. App. 18a-19a ¶ 14.

The national attention and threats also harmed Springfield economically. People were too afraid to go to businesses in downtown Springfield, fearing bombings or other violence. Amicus Br. App. 8a ¶ 22. Multiple organizations canceled plans to hold events at the county fairgrounds because they feared Springfield

21. Ted Brown, *Springfield cancels annual downtown culture festival*, WDTN (Sep. 16, 2024 9:13 AM, posted), <https://www.wdtn.com/news/local-news/springfield-cancels-annual-downtown-culture-festival/>; Jessica Orozco, *UPDATE: 3 grocery stores evacuated in Springfield reopen*, SPRINGFIELD NEWS-SUN (Sep. 18, 2024), <https://www.springfieldnewssun.com/news/at-least-2-grocery-stores-evacuated-in-springfield/UBNKF5KRXZCH3LY4N7H7RLLIOY/>.

22. Kathryn Mobley and Kaitlyn Schroeder, *Springfield buildings given all clear after bomb threat, including two schools*, WYSO (Sep. 12, 2024, 10:40 AM), <https://www.wyso.org/news/2024-09-12/bomb-threat-issued-to-multiple-locations-in-springfield>; Office of Governor Mike DeWine, *Governor DeWine Sends Ohio State Highway Patrol to Provide Added Security in Springfield City School District* (Sep. 16, 2024), <https://governor.ohio.gov/wps/portal/gov/governor/media/news-and-media/governor-dewine-sends-ohio-state-highway-patrol-to-provide-added-security-in-springfield-city-school-district>

was “too unsafe.” As a result, the events center at the fairgrounds lost important revenue. *Id.* Where previously, approximately twenty businesses contacted the Springfield Chamber of Commerce every year about relocating or opening a new business, no businesses have reportedly contacted the Springfield Chamber since the 2024 presidential debate. *Id.* 8a ¶ 23. The labor force in Clark County shrank, decreasing around four percent from June 2024 to December 2025.²³ Local business growth declined as Haitians started leaving Springfield because they feared hate and deportation.²⁴

Amicus wishes this Court to note that these safety threats were not caused by Haitian TPS holders. In fact, the City of Springfield’s website notes, “Haitians are more likely to be the victims of crime than they are to be the perpetrators in our community.”²⁵ *Amicus* declarants’ experiences are that the discriminatory comments made about Haitians eating dogs and cats in 2024

23. Midwest Info. Ctr., US Bureau of Labor Statistics, *Springfield* (Mar. 2026). https://www.bls.gov/regions/midwest/oh_springfield_msa.htm. Choosing back data shows a graph including June 2024 data.

24. Nicole Valdes, *Fearing deportation, some Haitian migrants leaving Springfield, Ohio*, CBS NEWS (Nov. 22, 2024), <https://www.cbsnews.com/news/fearing-deportation-some-haitian-migrants-leaving-springfield-ohio/>; Stephen Starr, *Haitian immigrants flee Springfield, Ohio, in droves after Trump election win*, THE GUARDIAN (Nov. 17, 2024), <https://www.theguardian.com/us-news/2024/nov/17/haitian-immigrants-springfield-ohio-trump-election>.

25. City of Springfield, *Immigration FAQs* (n.d). <https://springfieldohio.gov/immigration-faqs/>.

emboldened groups predisposed to white supremacist rhetoric and violence. *See* Amicus Br. App. 7a-8a ¶¶ 19-21. As Springfield mayor Rob Rue noted in 2025, “Those that have the national spotlight, a national microphone and choose to use words that could harm individuals, communities, those are the people that were responsible for bringing such a negative effect on our community.”²⁶

Many Springfield community members came together in response, spending their resources for collective safety and organizing for unity. Faith communities had to establish a security team. Pastor Ruby’s Central Christian Church installed additional, costly protective cameras, windows, doors, and lighting. Amicus Br. App. 7a ¶ 20. School staff protected students from the turmoil in the outside community. *Id.* 20a ¶ 18. Many, though not all, community members became even more united in caring for one another, including Haitian neighbors. As Pastor Ruby notes, “Central, G92, Springfield Neighbors United, and others only fortified our love for our Haitian community members.” *Id.* 9a ¶ 25. In part because of these unifying efforts, many Haitians remained in Springfield, despite the threats.

26. Judy Woodruff, *How Springfield and its Haitian immigrants are still dealing with election’s spotlight*, PBS NEWS HOUR (Apr. 23, 2025), <https://www.pbs.org/newshour/show/how-springfield-and-its-haitian-immigrants-are-still-dealing-with-elections-spotlight>.

IV. DHS's Announcement to Terminate Haiti's TPS Designation Fails to Consider the Interests of Communities Like Springfield and the Harm They Will Suffer

As much harm as Springfield has endured over the past several years, the impact of TPS termination threatens devastation to the city's culture, economy, schools, and faith community more than any preceding threat. Springfield residents fear for their safety if Haiti's TPS designation is terminated and ICE conducts mass enforcement involving collateral arrests, as it has already said it will do.²⁷

One cannot divorce Petitioners' decision to terminate TPS from the hateful, racially-charged rhetoric that has already caused so much damage in Springfield. The past several years have shown that, in Springfield, threats of immigration enforcement against Haitians rally white supremacist and other groups who feel emboldened by the racially-charged 2024 presidential debate comments in which enforcement against Haitians in Springfield was first mentioned. This was the case in 2024 after the presidential debate, and again as recently as February 2026. Around February 3, 2026, the date DHS planned to terminate Haiti's TPS designation, the local courthouse and other government buildings, schools, two churches, Wittenberg University, and Clark State Community College in Springfield received multiple bomb threats

27. Jessica Orozco, *Springfield braces for 30-day targeted ICE surge after Haitian TPS ends*, SPRINGFIELD NEWS-SUN (Jan. 27, 2026), <https://www.springfieldnewssun.com/news/springfield-braces-for-30-day-targeted-ice-surge-next-week-as-haitian-tps-ends/L6425QVWEFFGLAKHHRYHYJ3WEM/>.

and were evacuated.²⁸ Amicus Br. App. 9a ¶ 26. As discussed in Section III, *supra*, derogatory statements about Haitians made at a 2024 presidential debate were followed by bomb threats, death threats to local leaders, and white supremacist groups marching down the streets of downtown Springfield.

Even the threat of termination of Haiti’s TPS designation created current safety concerns that disrupt Springfield residents’ lives. Residents of all backgrounds in Springfield are afraid to participate in community gatherings and, in many cases, too afraid to leave the house at all. Amicus Br. App. 10a ¶ 27, 20a-21a ¶ 20. In addition, Springfield residents fear risks to everyone from aggressive or violent ICE enforcement actions.²⁹ *Id.* 22a ¶ 25. Further, residents fear for their Haitian neighbors’ lives if they are forcibly returned to Haiti, where they have already endured torture, murders of loved ones by gangs, and gunfire. *Id.* 11a ¶ 31.

Beyond safety threats, Springfield is suffering economic harm under the threat of TPS termination, and this harm will only worsen if Haitian TPS holders lose

28. Jessica Orozco, *Bomb threats continue, state supporting Springfield safety forces*, SPRINGFIELD NEWS-SUN (Feb. 11, 2026), <https://www.springfieldnewssun.com/news/bomb-threats-continue-state-supporting-springfield-safety-forces/2YS4XDRUJ5HRHDLFSH4VJZB56Y/>; Jessica Orozco, *3 Springfield houses of worship receive bomb threats*, SPRINGFIELD NEWS-SUN (Feb. 11, 2026), <https://www.springfieldnewssun.com/news/2-springfield-churches-receive-bomb-threats/L5VDGXYNDVA6RIN5IMKKPITLSE/>.

29. Jenilee Borek, *NAACP town hall in Springfield tackles immigration enforcement concerns*, DAYTON 24/7 Now (Dec. 9, 2025), <https://dayton247now.com/news/local/naacp-town-hall-in-springfield-tackles-immigration-concerns>.

immigration status and, consequently, authorization to work lawfully in the United States. Springfield generates approximately eighty percent of its revenue from local income taxes.³⁰ A loss of 10,000-15,000 residents who constitute a valuable part of Springfield's income-tax-paying workforce would have a serious impact on the city's income tax revenue. Losing an entire segment of Springfield's consumer base would also negatively impact sales tax revenue. Amicus Br. App. 27a ¶ 21. A loss in tax revenue in Springfield and Clark County will once again constrain local budgets and services.

Further, a sudden loss of tax revenue will disrupt the economic growth Springfield has experienced in recent years, which has largely coincided with the increase in the Haitian population. Haitian TPS holders in Ohio increase state and local tax revenue by \$21 million each year, as discussed in Section II, *supra*. Those tax revenue increases likely cannot be sustained without the working Haitian population. The 2026 budget for Clark County forecasts smaller increases in revenue, which relies heavily on sales tax, because, explained County Administrator Jennifer Hutchinson, "if [end of TPS] does go through, that will have a serious impact on our sales tax."³¹ Put starkly by former Clark County Commissioner Melanie Wilt, "ending TPS for Haitians would damage the local economy." Amicus Br. App 22a ¶ 19.

30. City Manager, City of Springfield, *City Manager's 2026 Preliminary Budget* (Nov. 1, 2025), <https://springfieldohio.gov/city-managers-2026-preliminary-budget/>.

31. Brooke Spurlock, *Clark County approves \$230M annual budget*, SPRINGFIELD NEWS-SUN (Dec. 24, 2025, updated Apr. 6, 2026), https://www.springfieldnewssun.com/news/clark-county-approves-230m-annual-budget/article_7f350334-c57a-56fa-861f-53eafbd68107.html.

Terminating Haitian TPS holders' immigration status and work authorization will cause a sudden and drastic reduction in the workforce that threatens the livelihood of local businesses and the surrounding economy. If Haitians lose immigration status, they will be forced to leave their jobs. Local employers have praised the reliable, solid workers from Haiti.³² Those workers will be gone. *Id.* 22a ¶ 24. Employers will not be able to replace Haitian workers with local residents because, as discussed in section I, *supra*, there are not enough U.S.-born workers to fill the gap. This will cause “the type of employment attrition we have seen in this area for decades.” *Id.* 27a ¶ 20. Leaders fear that businesses will not be able to operate at full capacity without Haitian workers, thereby reducing sales and production. *See id.* 10a ¶ 30, 22a ¶ 24.

Springfield experienced a glimpse of the economic harm that follows a drop in the Haitian workforce in 2024. Some Haitians left the region due to safety threats after the 2024 presidential debate comments, as discussed in Section II, *supra*. Springfield experienced the highest job loss – layoffs and job cuts – in all of Ohio since December 2024.³³ Amicus Br. App. 8a-9a ¶ 24. Ending TPS will harm the economy as described by Governor of Ohio Mike DeWine,

32. Miriam Jordan, *How an Ohio Town Landed in the Middle of the Immigration Debate*, THE N. Y. TIMES (Sep. 3, 2024), <https://www.nytimes.com/2024/09/03/us/springfield-ohio-school-bus-crash-haiti-immigrants.html>.

33. Cornelius Frolik, *Springfield has the worst job losses in Ohio: Haiti TPS ending could make it worse*, SPRINGFIELD NEWS-SUN (Feb. 3, 2026) <https://www.springfieldnewssun.com/local/springfield-has-the-worst-job-losses-in-ohio-haiti-tps-ending-could-make-it-worse/ZCHAYTVFC5EFLCS6QJQTHV3NEI/>.

because Haitian workers filled “jobs that couldn’t be filled before...the fact that they are working creates other jobs frankly,” and ending TPS will harm businesses by leaving them without workers.³⁴

With a declining population, residents realistically fear the closure of retail or service businesses. For example, one local Haitian couple provides home health care to aging Springfield residents, and uncertainty remains about how those home health needs would be met if they must leave. Amicus Br. App. 11a ¶ 31. The south side of Springfield may once again see its only grocery store close. *Id.* 21a-22a ¶ 23.³⁵ Instead of a trend of businesses opening, residents fear a return to retail closures, as before the Haitian community arrived.³⁶

34. Perry, *supra* note 7.

35. Hasan Karim, *New grocery now serving Springfield residents in former food desert*, SPRINGFIELD NEWS-SUN (Dec. 19, 2021), <https://www.springfieldnewssun.com/news/new-springfield-grocery-serving-residents-in-former-food-desert-opens-its-doors/55QU7QOALBC73PERDALKYSPKPA/>.

36. Matt Sanctis, *Springfield Target to close Saturday night*, SPRINGFIELD NEWS-SUN (Jan. 16, 2016), <https://www.springfieldnewssun.com/news/local/target-close-springfield-store-this-weekend/RrPZ4RTq8LvMU052vy3bZO/>; Matt Sanctis, *5 things to know about Kroger’s move to close a Springfield store*, SPRINGFIELD NEWS-SUN (Aug. 2, 2018), <https://www.springfieldnewssun.com/news/local/things-know-about-kroger-move-close-springfield-store/a8CF9jZq5MfdvtNGluPSwI/>. Some businesses are already on the brink. Ismael David Mujahid, *Haitian-owned business faces closure as immigrants flee Springfield*, SPRINGFIELD NEWS-SUN (Jan. 31, 2026), <https://www.springfieldnewssun.com/local/haitian-owned->

The bomb threats and, consequently, the school closures and closures of government buildings have taken a toll on the everyday Americans who live in Springfield. Springfield residents of all backgrounds are afraid to send their children to school. Termination of Haiti's TPS designation threatens the security and quality of education for all of Springfield's children. Amicus Br. App. 9a-10a ¶ 27. Immigrant residents fear going to after-school tutoring or adult education. *Id.* 9a-10a ¶ 27, 20a-21a ¶ 20. Residents are terrified that if TPS ends, ICE's resulting mass enforcement actions will leave children terrified and without their parents. *Id.* 26a ¶ 17. Recent threats of violence on and after the Haitian TPS designation's original February 3, 2026 termination date caused many parents to keep their children home from school. *Id.* 9a-10a ¶ 27. Even the soccer team at Springfield High School will suffer, losing an estimated one-third to two-thirds of its members, who are Haitian-born.³⁷

business-faces-closure-as-immigrants-flee-springfield/
JFXULISDYNE63LHYQDM2XDL37I/

37. Tom Archdeacon, *Archdeacon: They didn't share a language, but they shared a jersey—and that was enough*, DAYTON DAILY NEWS (Feb. 15, 2026), <https://www.daytondailynews.com/sports/archdeacon-they-didnt-share-a-language-but-they-shared-a-jersey-and-that-was-enough/U5I4574G5VCDVFZLN2H6LTVM2U/> (credit to photo following footnote).



Faith communities will also be harmed if TPS for Haitians terminates. Several churches have already received threats of violence. Pastor Carl Ruby at Central Christian Church in Springfield has received multiple death threats and continues to receive multiple threatening calls daily because of his support of the Haitian community. Amicus Br. App. 8a ¶ 21.

38. Faith Bosland, Photograph of Springfield High School Men's Soccer Team (2025) (on file with author).



Finally, the termination of the Haiti TPS designation threatens to separate over a thousand U.S.-born children of Haitian parents if ICE's threats of mass deportation efforts come to pass. Approximately 1,500 U.S.-citizen

39. Carl Ruby, Photograph of Sign Hung on Window of Central Christian Church (2024) (on file with author).

children have been born in Springfield to Haitian parents in recent years.⁴⁰ ICE's threats of mass immigration arrests will ensure the separation of those children from their parents if the parents lose lawful status. An influx of hundreds of children into Ohio foster care would exacerbate a system that is already overwhelmed as a result of the opioid crisis.⁴¹ Further, DHS poses no alternative solution or plan to assist Haitian families with obtaining U.S. passports so the children can reunite with parents.⁴²

When DHS announced its intention to terminate Haiti's TPS designation, Springfield community members continued to unify and act. Springfield residents, including longtime community members, showed that they are open to learning about the background of Haitian immigrants and open to learning from new neighbors. Amicus Br. App. 26a ¶ 15. Residents contribute volunteer hours at St. Vincent de Paul to help Haitians and others in need, including helping United States citizen children obtain passports in case of mixed-status family separation. *Id.* 15a-16a ¶ 6. Native Springfield residents have unified behind their Haitian neighbors because they know how Petitioners' premature termination of Haiti's TPS designation, without following proper procedures to consider the statutorily-

40. Starr, *supra* note 9.

41. Legislative Budget Off. of LSC, Ohio Legislative Serv. Comm'n, *Foster Care in Ohio* (Apr. 2024), <https://www.lsc.ohio.gov/assets/organizations/legislative-service-commission/files/foster-care-in-ohio.pdf>.

42. Stephen Starr, *The desperate drive to secure passports for thousands of US-born Haitian kids – before it's too late*, THE GUARDIAN (Jul. 4, 2025), <https://www.theguardian.com/us-news/2025/jul/04/passports-haitian-kids-tps-trump-administration>.

mandated criteria and in the context of a discriminatory anti-Haitian campaign has harmed Springfield greatly. They are asking this Court to do the same.

* * *

If this Court wishes to see a specific example of the way in which Haitian TPS holders benefit, not harm, U.S. communities, it need look no further than to examine the experience of Amicus and other Springfield and Clark County residents. The economic growth the Haitian community has brought to Springfield has created opportunities for the city to improve infrastructure, expand businesses, grow faith communities, and enrich schools. All Springfield residents have the opportunity to benefit from this impact.

By contrast, if TPS is terminated, Springfield and its non-Haitian residents will face serious economic harm, including a substantial loss of tax revenue, rapid workforce decline, and regression in recent business development. Most importantly, threats to the Haitian community's security have historically always brought threats to the security of the entire Springfield community, including bomb threats to local schools, churches, and government agencies.

Pastor Carl Ruby notes that in order for Springfield to recover from the trauma it has endured over the past two years, its residents must know that Springfield's Haitian friends, family, church family, employees, students, and neighbors are safe and secure in the community. Protected immigration status and work authorization for Haitian TPS holders provide security

not only for Haitians, but for the entire community in Springfield. Amicus Br. App. 12a ¶ 33. In the absence of a fully-developed record and trial court decision, Amicus asks this Court to consider both the District Court for the District of Columbia and the United States Court of Appeals for the D.C. Circuit's findings that Respondents' claims should succeed on the merits and rule in Respondents' favor. Amicus asks the Court to consider what Petitioners have not: the many ways in which Haitian TPS holders benefit communities like Springfield and the actual harm that will befall these communities if Haiti's TPS designation ends prematurely.

CONCLUSION

For the above reasons, the Court should find 8 U.S.C. § 1254a(b)(5)(A) does not preclude Respondents' claims, and find that Petitioners' premature decision to terminate the TPS designation for Haiti violates the Administrative Procedures Act and the Equal Protection Clause.

Respectfully submitted,

/s/ Kathleen Kersh

KATHLEEN KERSH

Counsel of Record

RENEE MURPHY

RYAN DAVIS

TAYLOR FORD

ADVOCATES FOR BASIC

LEGAL EQUALITY, INC.

130 West Second Street,

Suite 700 East

Dayton, OH 45402

(419) 255-0814

kkersh@ablelaw.org

Attorneys for Amicus Curiae

DATED: April 13, 2026

APPENDIX

TABLE OF APPENDICES

	<i>Page</i>
APPENDIX A — DECLARATION OF PASTOR CARL RUBY, DATED FEBRUARY 20, 2026.....	1a
APPENDIX B — DECLARATION OF DR. CATHERINE PEYROUX, DATED FEBRUARY 24, 2026.....	14a
APPENDIX C — DECLARATION OF MELANIE FLAX WILT, DATED FEBRUARY 24, 2026.....	23a

**APPENDIX A — DECLARATION OF PASTOR
CARL RUBY, DATED FEBRUARY 20, 2026**

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. I am the Senior Pastor at Central Christian Church in Springfield, Ohio. I have held this role since 2014. As a Senior Pastor, I provide spiritual leadership to my congregation, preach on a weekly basis, provide pastoral care to people in need, and oversee our church outreach activities. Central Christian Church (“Central”) is a church heavily invested in serving our local community in a variety of ways.
2. In addition to my position at Central, I also am a member of G92, a coalition of churches, community members, and other faith-based organizations in Springfield. G92 formed in 2024 to support our growing Haitian community in Springfield. I am also a member of Springfield Neighbors United, another group that advocates for and supports our neighbors in need, including immigrants, in Springfield and throughout Clark County.
3. My work with immigrants started when I was working at Cedarville University as an Associate Dean of Student Life. In 2008, I put together a civil rights bus tour to track the historic events in the life of Dr. Martin Luther King Jr. On that tour, I read King’s Letter from a Birmingham Jail, and I felt convicted. I was embarrassed by the way many pastors had not stood up for the civil rights movement. I made a

Appendix A

commitment to myself that if I ever heard someone being attacked because of where they came from, I was not going to sit on the sidelines.

4. My connection to the Haitian community is driven by my faith in and study of the Bible. The Old Testament repeatedly mentions God's love for immigrants, widows, and orphans. These groups are so important to God that His love for them is referenced in the Sermon on the Mount and the Ten Commandments. The Bible has dozens if not hundreds of verses about Christians' responsibility to stand with people who are being oppressed. In Matthew 25, verses 37-46, Jesus praises those who invite in the stranger and condemns those who do not invite the stranger in. Those who welcome the immigrant will be blessed with eternal life, and those who do not will "go away to eternal punishment." It is clear from the Bible that in the Kingdom of Heaven, welcoming a refugee is the same as welcoming God and welcoming Jesus. I believe that not welcoming refugees is slamming the door in Jesus's face. This core belief that I hold as a student of the Bible and a follower of Christ is what led me and many members of our church family to the Haitian community in Springfield.

Haitians Come to Springfield

5. The Haitian community in Springfield first started growing quickly around 2021. I would like to think Haitians came here, in part at least, because we in Springfield had developed a reputation as a city that

Appendix A

welcomes immigrants. I and others had worked for over ten years educating our community about the benefits immigrants bring to the communities where they live, especially when those communities are facing economic downturns like Springfield was.

6. I have spoken with many, many Haitian immigrants over the past few years. My sense is that Haitians came here because there were jobs and housing here, and they thought it was a safe community for them to live and raise their families. Initially, a few Haitians came, and they felt welcomed. Springfield's reputation spread in the Haitian community through word of mouth, and more Haitians came here to join their friends and family.
7. I know there have been many stories in the media about a concerted effort to get Haitians to come to Springfield, and I do not think those stories are true. The only recruitment I have seen was from Haitians already in Springfield because they liked the community here so much.

My Involvement in the Haitian Community in Springfield

8. I have been deeply involved with our growing Haitian community in Springfield since 2023, when there was an accident involving a Haitian driver and a school bus and a young child, Aiden Clark, was killed. This was a truly horrible thing that happened to this boy's family and to our broader community.

Appendix A

9. One night, shortly after the accident, I was at home getting ready to go to bed, and one of my congregation members texted me and told me to turn on my television to watch the Springfield City Commission meeting. I turned it on and was horrified by the comments. I heard people making hateful comments about Haitian people. There were racial comments. People were saying that we had to drive Haitians out of our community.
10. When I heard these comments, I felt activated. I changed my clothes and drove down to City Hall to testify on behalf of Springfield community members who would not stand for this kind of hate. I spoke at several commission meetings after that. I felt like everything I had been pondering since that moment in Alabama in 2008 had led up to this. God had prepared me for this moment.
11. I set up a meeting with about thirty local pastors and fifteen local Haitian pastors and community leaders. The purpose of the meeting was for us to collaborate on ways we could work together. At that first meeting, the Haitians started talking about what was happening to them and their families, and you could hear a pin drop when they spoke. The Haitian community members were talking about their homes, business, and cars being vandalized. They spoke about what Haiti was like—how dangerous it was, how they had left a type of violence that none of us could even imagine. But what impacted the Springfield pastors the most was the experiences the Haitian children were having at

Appendix A

school, as other children were repeating things their parents had said to them—hateful things about how the Haitians should not be here.

12. I began to work with a Haitian community leader, Viles Dorsainvil, who wanted to found the Haitian Community Support Center. He and I have come to be very close, and I welcomed him and many other Haitians to Central to worship with us and be part of our church family.
13. During this time, Haitians still continued to move to Springfield. They have contributed to our local economy immensely. Many Haitians work in metal working, food processing, healthcare, distribution (Amazon), and automobile parts manufacturing. I have spoken to many employers of Haitian immigrants over the years. They will tell me that it takes 1.5 Americans to replace a Haitian worker because the Haitian worker always shows up to work on time, they are eager to work extra hours, and they always pass drug tests. Many of the Haitians living here were doctors and lawyers in Haiti, but they work manufacturing or other factory jobs because they cannot use their Haitian professional licenses in the United States.
14. Many people know that Springfield faced some challenges initially with the increase in the Haitian population. But by 2024, Springfield had really gotten a handle on most of the things that were challenging the community when the Haitians first arrived. For

Appendix A

example. Rocking Horse Clinic, the local Federally Qualified Health Center, hired Haitian Creole interpreters, including some Haitian physicians. The schools were also adapting. The Springfield Police Division chief went out of her way to get to know the leaders in the Haitian community. She would attend some of their community events. Just her presence showed that she was showing up for them, that they were part of our community just like everyone else.

15. Haitians also contributed to the culture of Springfield. In 2024, a group of Haitians wanted to host a Haitian Flag Day celebration in the park that is in the center of the city. City leaders helped them plan and promote the event. The police came to provide protection. It was a wonderful event that many people in Springfield, including non-Haitian people, attended.
16. Haitians are also a big part of our faith community in Springfield. One of the things I did as a pastor to welcome the Haitians was invite them to church. We provided a church family for them at Central. About twenty-five percent of the congregation at Central is Haitian. On Sunday afternoons, if you come to our church, you will see Haitian men and boys playing basketball, Haitians learning English in our free classes, and Haitians and non-Haitians gathering and talking in fellowship for Christ.

The 2024 Debate and Fallout

17. By September 2024, our community in Springfield had really gotten a handle on the challenges we had

Appendix A

faced when the Haitian community first arrived. Then, on September 10, 2024, President Trump made a comment about Haitians eating cats and dogs at the debate on national television, and life became a nightmare.

18. I want to say that I really do not like talking about that comment. I do not like speaking it out loud. Not only is it dehumanizing to Haitians, it is so offensive to all of us in Springfield.
19. Once President Trump made that comment on national television, white supremacist groups descended into Springfield. They marched in the streets of downtown. They made countless calls—I do not even know how many bomb threats we had. They threatened to kill the children and rape the wife of one of our leading city officials. They made the same threats to one of our business owners. They threatened to bomb the schools in Springfield. Ohio State Highway Patrol troopers had to stand guard so the children could safely go to and from school.
20. Our faith communities, like Central, have been harmed. At Central, we have had to establish a security team to protect the church. We have to spend \$165,000 to install tinted windows, bullet-proof glass, and more secure front doors. We have paid \$45,000 on lighting and cameras around the church so white supremacists and others will not sneak up and harm our church members, which they have threatened to do. Our church has been called a “safe haven” by city officials, and now we have to install bullet proof glass.

Appendix A

21. I have received death threats. I receive multiple threatening calls every day. My family is afraid for my safety. It has become extremely hard to pastor my church. Even though my congregation has been supportive, I am fatigued.
22. Springfield has suffered huge economic damage from the fallout of the cats-and-dogs comment. No one was frequenting any of the businesses downtown because of the bomb threats and fears of other forms of violence. I spoke with one person who worked for a big event center at the fairgrounds, and she said that, right after the cats-and-dogs comment, organizations started cancelling their events in Springfield. The event center lost thousands of dollars as one group after another cancelled, saying they could not come to Springfield because it was too unsafe.
23. I have heard from the Chamber of Commerce that Springfield would typically get twenty to twenty-five inquiries from people a year seeking to relocate their business to Springfield. I was told by the president of the Springfield Chamber of Commerce that we have not had a single inquiry since the cats-and-dogs comment to date.
24. Before the Haitians arrived, Springfield was one of the fastest shrinking cities. When the Haitians arrived, we became one of the fastest growing cities. They were boosting our economy. But in the year after the cats-and-the-dogs comment, Haitians started leaving Springfield because they felt unsafe, and the jobs left,

Appendix A

too. Springfield led the state in job losses, and that all started after the eating-the-cats-and-the-dogs comment.

25. After this comment was made in the 2024 debate. Springfield residents turned inward; we realized the best support our community was going to get was from each other. I am proud that Central, G92, Springfield Neighbors United, and others only fortified our love for our Haitian community members. These comments were meant to divide us, and that did happen to some extent, but many of us became more united afterwards. Many Haitians stayed and are still a part of our community and our lives in Springfield.

Impact of TPS Termination on Springfield

26. Grief has hung over the city since Secretary Noem announced the termination of Haitian TPS. This grief will not go away as long as there is a threat that Springfield will lose twenty percent of our population. Springfield is already experiencing a drastic increase in safety threats because of the looming TPS termination. On February 9, 10, and 11, 2026, there were multiple bomb threats at the courthouse, at Clark State Community College, and at two local churches. The Springfield City Schools were evacuated and the schools were closed.
27. The bomb threats and, consequently, the school closures and closures of government buildings have taken a toll on the everyday Americans that live in

Appendix A

Springfield. They are afraid of sending their children to school. They are afraid of going to big events. There is a big festival in Springfield every year called Culture Fest. It draws hundreds of people to the city. Last year, we had to cancel this event for fear that white supremacist groups would show up and be violent.

28. The constant fear for our safety and the shame over the harm to Springfield's reputation has been really hard for the people of Springfield to endure. And none of this is a result of anything the Haitian community has done—in fact, I fear things will get far worse if TPS ends and they are taken from Springfield.
29. The damage to the economy in Springfield if the Haitian population is forced out will be something from which we may never recover. Clark County is a rural county, and I am told we would lose \$5 million a year in sales tax revenue alone if TPS is terminated and the Haitians have to leave Springfield.
30. I have heard from manufacturers in and around Springfield that they have entire shifts of only Haitians. The factories had been running two shifts and they added a third shift of Haitian workers, which helped them grow their businesses significantly. Much of that has already gone away with the threat of TPS ending because these businesses cannot bid on jobs when they do not know what the future of their workforce will be.

Appendix A

31. Finally, the threat to our faith community, to those of us who follow Jesus Christ's teachings, is huge if TPS ends. We will be forced to separate from our Haitian church family, who Central and other church congregations have grown to love. I and others who follow Christ in Springfield are terrified for our Haitian church family and what will happen to them if they return to Haiti. I have sat with many Haitian members of our church as they wept out of pain for what they have endured in Haiti and fear if they are forced to go back. I sat with one man who is a leader in our church who was imprisoned and tortured in Haiti after he spoke out against the government's corruption. The gangs killed one of his lifelong friends, decapitated his body, and left it on my friend's front porch about a year ago. He cares for his family and two orphaned children who live in Haiti and would love to be reunited with them, but he cannot return to Haiti because he knows he will be killed. Another couple in our church are professionals, they fled Haiti under gunfire and came to the United States to apply for asylum. In Springfield, they have started a real estate business and a home healthcare business to care for our aging population. What happens to those they care for if this couple has to leave Springfield? How long will they be able to dodge actual bullets in Haiti? These are the questions that keep me up at night, that have kept me from taking a break or having a day off in months.
32. People will ask me, why do you choose to defend the Haitian community in Springfield? But it has never

Appendix A

felt like a choice to me. People ask me, “Aren’t you afraid of the threats that are being made against you?” And I say no, I have not given them a lot of thought. Central is a very Jesus-centered Church. We focus on His teachings in our worship. Jesus said to treat other people as you want to be treated. If my country were in ruin, and I were fleeing for my life, I would want to be welcomed and protected.

33. It is so clear to me that what I am called to do as a Christian is to stand alongside our Haitian brothers and sisters, to defend them and pray for the continuation of TPS. I do this not just for them, although they are worthy on their own, but for our entire community in Springfield. If we are going to recover from the trauma we have endured in the past two years, we must know that our Haitian friends, family, church family, employees, students, and neighbors are safe and secure in our community. Their security impacts the rest of us in Springfield.
34. I am asking this Court to please consider the devastating consequences our broader community in Springfield will suffer if the stay is lifted and TPS is terminated.

I declare under penalty of perjury and under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

13a

Appendix A

Executed in Springfield, Ohio on: 2/20/26
Date

/s/ Carl Ruby
Dr. Carl Ruby

**APPENDIX B — DECLARATION OF
DR. CATHERINE PEYROUX,
DATED FEBRUARY 24, 2026**

Pursuant to 28 U.S.C. § 1746, upon personal knowledge, I hereby declare as follows:

1. My name is Catherine Peyroux. The facts set forth in this declaration are based on my personal knowledge, unless otherwise indicated, and, if called as a witness, I could and would testify thereto. I am sixty-five years of age and of sound mind to declare to the facts stated herein.
2. My first career was as a historian of medieval Christianity. My last professional appointment in the field was that of Associate Professor of the History of Christianity at Drew Theological School at Drew University. I earned a Ph.D. from the History Department at Princeton University in 1991.
3. I have been a resident of Springfield, Ohio since 2016. I grew up eight miles south of Springfield, Ohio in Yellow Springs and moved back to the area for family reasons. I earned an MA-TESOL (Master of Arts-Teaching English to Speakers of Other Languages) degree from Wright State University in the spring of 2020 to allow me effectively to teach English to speakers of other languages.
4. From August 2021 to May 2025 I worked for the Springfield City School District. For two and a half of those years, I served as the EL (English

Appendix B

Learner) Curriculum, Assessment & Student Success Coordinator for Springfield City School District. I taught and observed in classrooms across the district and assessed students from all the schools. I led the overhaul of the school district's English Learner (EL) program, and the development of comprehensive ESOL materials and curriculum to serve students K-12. In my last year, I returned full-time to the classroom to teach English Learner students at Hayward Middle School.

5. My direct work with the Haitian community started primarily from my leadership role developing the EL program with the Springfield City School District and my teaching.
6. I am currently a member of Springfield Neighbors United, who are predominantly a group of residents of Springfield who have lived or worked in this community for at least a generation; this organization works to support Springfield residents, including immigrants and those in the Haitian community. I volunteer once per week at St. Vincent de Paul-Springfield Region to help neighbors apply for US passports for their citizen children. I created and volunteered in an afterschool ESOL tutoring program at the local public library until this month (February, 2026) when families became too anxious to send their children for English instruction. I am involved in G92, a local group supporting care and protection of the stranger, as is commanded in scripture for those of us who profess a Christian witness. Finally, I am on

Appendix B

the steering committee for the Amos Project, which is a coalition of mostly pastors working to support the underserved on Springfield's south side, and on the executive committee of the Springfield, OH chapter of the NAACP (Unit 3201).

Community Before Haitians Came to Springfield

7. When I first moved to Springfield in 2016, the Springfield area was considered so undesirable that I had to coax friends from Yellow Springs to visit me. There was a general sense of intense dilapidation of the city. People openly spoke of fearing breaking an axle on the roads because streets were in such disrepair. Entering the city, the exteriors of industrial spaces on the south side were dilapidated and scary. In addition, the housing stock in Springfield was in a fairly dire state, as I know because in May 2021 I volunteered to write a grant proposal with 1159 South, an organization which had been founded to combat the pervasive civic blight in our city, that was trying to rehabilitate housing at that time.
8. Between 2016 and the time Haitians largely began coming to Springfield in 2021, the trajectory of the city had continued to sink into disrepair. Springfield lost major retailers including Target, and for several years residents in the south of Springfield had no local option to purchase necessities such as diapers or fresh produce with the 2018 closing of the neighborhood Kroger grocery store. In addition, we were given to understand that because the tax base was inadequate,

Appendix B

there was observably not enough money to maintain well-paved streets or inviting public spaces. I remember repeatedly volunteering with non-profit initiatives (Springfield Promise Neighborhood) to pick up stray trash and detritus on south-side streets because city services did not keep up.

9. The downward trajectory of Springfield matched the downward trajectory of the school system where I worked. In 2021, when I joined the district. Springfield City School District's (SCSD) ESOL instruction was frankly noncompliant with the law governing English Learners' access to appropriate instruction (Lau v. Nichols, 1974; Castaneda v. Pickard, 1981).

Haitians Coming to Springfield and Community Impact

10. When large numbers of Haitian immigrants began arriving in Springfield, there was observably an initial stress on city services, including on the school system, due to increased enrollment from students arriving at all times throughout the school year, and the lack of competent programs, training, and tools to appropriately educate so many new students for whom English was not their first or academic language. This stress exposed a district limitation that had already been present and actively harming children of other immigrant communities in the city.
11. As time went on, the community began to collectively see the immense benefits that Haitians brought to Springfield. The surge in population brought a

Appendix B

significantly elevated tax base, providing fresh funds for schools and roads, and an opportunity that SCSD took, to its credit, to appropriately meet its obligations for Springfield's English Learners.

12. In addition, I witnessed the housing market become revitalized, including a drastic increase in assessed property values (including my own home) and renovations of swathes of long-neglected properties. There was also a shared benefit of significant growth across economic sectors, including the revitalization of major manufacturing and retail. I also saw the Haitian community play a major in the revitalization and racial integration of churches in Springfield.
13. Where I worked at the Springfield City School District, the increased enrollment brought the hiring of new ESOL teachers. As teachers across the district learned new skills and developed new tools to help students move forward linguistically and academically, these instructional strategies benefited students across the district of all backgrounds. I helped the district bring in a state-funded literacy initiative that improved reading levels of all the students in the test classroom, which we knew because we did an action research evaluation of the initiative. Also, the school district developed and facilitated a bilingual certificate that could be used to the advantage of all students academically and in transitioning to employment.
14. In addition, I personally saw new Haitian students bring a joy and seriousness about learning into

Appendix B

classrooms across the district. I was meeting students who were the children of professionals, nurses, doctors, lawyers , etc., from Haiti. These were the children of families whose expectations envisaged professional degrees for their children. Children learn horizontally from each other as well as vertically from a classroom instructor, and it created a gravitational pull that raised the level of expectation for other students. In sum, the influx of new Haitian students was a gift to the whole district and demonstrably a net positive for our city.

The 2024 Debate and Fallout

15. By the summer of 2024, the initial pressures on the school system to manage the absorption of a new population had largely subsided, and enrollment had stabilized and also become manageable. There was also a general sense in Springfield that the initial stress on the city was beginning to be reduced, and that we were together poised to reap the benefits of a revitalizing community. However, there remained a negative public discourse regarding past frustrations, led by what I believe was a very disproportionately small faction in the community.
16. As an ESOL teacher at Hayward Middle School, I was keenly aware of the public discourse about Haitians. I watched it go from Fox News to J.D. Vance talking about a crisis, a crisis that was already subsiding here by then.

Appendix B

17. The comments themselves and the national discourse around them did violence to Springfield. In my role as a teacher, I saw schools shut down because of bomb threats, and in the Fall of 2024 in my homeroom students of all races and backgrounds disappeared from the school for weeks at a time, because parents were so afraid to send their children to school.
18. In the fallout from the comments and presidential debate, the community and the school system had to heal. Hayward Middle School, where I worked, acted as a fortress against the turmoil in the outside community.
19. As time passed following the comments, there was a sense that the Springfield community became more strongly connected with each other, even as we were abandoned by those pushing a false narrative from outside the community. There was and remains in the organizations to which I belong a sense of care for each other including our Haitian neighbors, and a shared protective anxiety. Impact of TPS Termination on Springfield
20. If TPS is terminated, and a surge of enforcement officers arrives, I have repeatedly heard Springfield residents of all backgrounds state that they will fear sending their children to school, participating in community gatherings, and in many cases be too afraid to leave the house at all. I have already started to see this personally. People are too afraid to send their children to the afterschool ESOL

Appendix B

tutoring program begun to support English Learners' academic growth. The church-situated English language classes I taught on Sunday afternoons have had to move on line out of fear for participants' safety. The (all- English-language-speaking, all US-citizen) gospel choir I sing with cancelled all February choir practices due to anxiety about the public safety of our members.

21. I believe the end of TPS would do an enormous violence to the financial stability of our town. Springfield was in a persistent state of decline and economic malaise, and we were just starting to pull out of it due to the increased population and material growth that was spurred by the arrival of the Haitian community.
22. It seems all too likely that we will go back to shrinking both in population and in our tax base. Sales tax is already regionally high in our city. That will leave the city without revenue to finish improvements in progress. For example, needed repair and repaving of streets is ongoing and not yet done, especially on the south side of the city. Badly needed signage reminding drivers of the lowered speed limits near schools is in place only at one school on a recently repaired road, and it follows logically that the city will not have funds to place this signage at other schools if we face declining revenue.
23. I also believe that retail will again suffer without the customers. I fear that instead of the expansion that population growth has sustained, the only grocery

Appendix B

store on the south side of Springfield where I live. Groceryland, will close and the area will return to being a food desert.

24. In the time when Springfield came under direct hostile national attention in 2024, I paid attention to employers like the owner of McGregor Metal saying how grateful he was for the reliable, solid workers from Haiti. Those workers will be gone.
25. I worry for all of our safety if TPS ends. I wonder if I go to deliver food to a neighbor, will a federal enforcement officer who has been assured of impunity accuse me of impeding and shoot me in the face? Also, if I go to deliver food to a neighbor, will I endanger them? This is the level of anxiety that we are all now living with. I pray for the day I can go back to just walking down the street without being afraid, and without my students, of all complexions and nationalities and statuses, being afraid. I pray for returned peace in our city.

I declare under penalty of perjury and under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed in Springfield, Ohio on February 24th, 2026

/s/ Dr. Catherine Peyroux
Dr. Catherine Peyroux

**APPENDIX C — DECLARATION OF
MELANIE FLAX WILT,
DATED FEBRUARY 24, 2026**

Pursuant to 28 U.S.C. § 1746, upon personal knowledge, I hereby declare as follows:

1. My name is Melanie Flax Wilt. The facts set forth in this declaration are based on my personal knowledge, unless otherwise indicated, and, if called as a witness, I could and would testify thereto. I am forty-eight years of age and of sound mind to declare to the facts stated herein.
2. I have been a resident of Clark County, Ohio my entire life. From 2017 through 2025, I served as a Clark County Commissioner, where I represented residents of the city of Springfield, which is the county seat.
3. I also own and operate a public relations firm that specializes in the sectors of food & agriculture, rural health and communities. The headquarters for my firm is located in downtown Springfield, Ohio.
4. As a Clark County Commissioner for nearly a decade, I worked on many challenges facing the community, including housing and economic development.

Community Before Haitians Came to Springfield

5. Up until the Haitian immigrants came to Springfield, the city was in the midst of a decades-long population decline. Springfield was a city built to accommodate

Appendix C

80,000 to 90,000 people, and we were operating with a population of closer to 50,000.

6. There were several reasons for the steady population decline, including young people moving away for college or military service, and the loss of major employers. There was a “brain drain” happening in Springfield.
7. By 2020, the city was not growing but was steady. We were making significant strides on improving infrastructure, but hadn’t yet been able to get over the hump of decades of decline. We were always in a mode of trying not to lose more, and clawing our way to keep what we had. Still, we were able to bring in new employers and planned major projects. Then COVID hit and set us back.
8. Some big projects that were planned did not come to fruition. The projects that did come to fruition created new jobs, for which employers had trouble hiring. Haitians Coming to Springfield and Community Impact
9. When large numbers of Haitian immigrants came to Springfield, there was a positive economic, cultural, and social impact.
10. The most immediate economic impact was that Haitian immigrants took lots of jobs that needed to be filled, including many jobs in manufacturing and distribution that other county residents were

Appendix C

generally not applying for. This was a net benefit to the community and the employers in Springfield, and throughout Clark County.

11. In addition, the Haitian population in Springfield largely shopped locally, bringing new money into the economy. While I was out in the community, I often saw Haitian immigrants shopping at local businesses, including local franchises of large stores like Wal Mart, Marshalls, and Lowes, instead of going to Dayton or Columbus to shop. Since Clark County is supported by sales tax, this also brought new tax revenue for public projects and development.
12. Some Springfield residents were afraid that the newcomers would take resources, such as SNAP benefits, from more established residents who needed them. This turned out to be unfounded, as benefits provided to Haitians had no impact at all on resources available to longtime residents.
13. My personal experience in the community with Haitian immigrants has been very positive. It has been great to see people taking part in the community, both economically and socially.
14. From a cultural perspective, the surge of Haitian immigrants has brought new life to Springfield. Sometimes in order to improve the culture in your community, you have to recognize and break old habits. Haitian immigrants came and put a mirror up to us as a community, and showed the community ways

Appendix C

to adapt and learn. That has been the best part—who we have become as a community by learning to embrace our Haitian neighbors.

15. I have seen many longtime community residents seek to learn more about the background of Haitian immigrants, and understand why they wanted to join our community. This experience has opened our eyes and brought forward a willingness to accept those who may not look like us or talk like us. Culturally it has made our community open to making progress, and expanded our opportunities in every way. Impact of TPS Termination on Springfield
16. If TPS is terminated, I believe it would have a negative impact on Springfield.
17. There is already a sense of anxiety among our Haitian and Hispanic neighbors, and any immigration enforcement action could pull families apart and leave terrified children here without their parents.
18. ICE is a different kind of law enforcement agency. I have worked with law enforcement and the criminal justice system, and it seems that ICE operates with different set of protocols, expectations, guardrails, and values than I have come to respect within the Clark County Sherriff's Office and the Springfield Police Department.
19. My experience as a Clark County Commissioner makes me believe that ending TPS for Haitians would damage the local economy.

Appendix C

20. If Haitian immigrants vacated their jobs, employers would not have anywhere new to draw employees from, which I believe would create the type of employment attrition we have seen in this area for decades. Businesses could not run at full capacity, creating a negative effect on sales and production.
21. The biggest immediate financial impact would be a reduction in sales tax revenue, which the county counts on for support. If you take an entire segment of the population away, the tax revenue will suffer. That has the potential to create budget shortfalls for projects throughout our community.
22. There are so many residents in our community who are open to new neighbors, to help challenge us and help us grow. We want to learn from others.
23. We do want folks to immigrate through proper channels, and our Haitian neighbors have done that. I don't think it would be fair to change the rules in the middle of the game.

I declare under penalty of perjury and under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed in Springfield, Ohio on February 24, 2026

/s/ Melanie Flax Wilt
Melanie Flax Wilt