

No. 25-1084

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

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

*Petitioners,*

*v.*

FRITZ EMMANUEL LESLY MIOT, *et al.*,

*Respondents.*

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ON WRIT OF CERTIORARI TO THE UNITED STATES COURT  
OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

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

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**INTERESTS OF *AMICUS CURIAE***

*Amicus Curiae* Springfield Neighbors United (“SNU”)<sup>1</sup> 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

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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 Flax 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 its 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. Former Clark County Commissioner and community leader Melanie Flax Wilt<sup>2</sup> notes Springfield is a former manufacturing hub that was 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.<sup>3,4</sup> The flight of young residents resulted in an aging and shrinking workforce. By 2016, Springfield's population had become older than

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2. *Amicus* relied on the first-hand experiences and knowledge of three Springfield and Clark County leaders, Pastor Doctor Carl Ruby, Dr. Catherine Peyroux, and former Clark County Commissioner Melanie Flax Wilt, for information contained herein. Their full declarations are on file with counsel and available online. *See, infra*, note 4, note 6, note 11.

3. 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/>.

4. Melanie Flax Wilt Decl. ¶¶ 5-6 (Feb. 24, 2026), <https://www.ablelaw.org/media/2126/flax-wilt-declaration-final-signed.pdf>.

the national average, skewed toward a demographic group less likely to participate in the labor market.<sup>5</sup>

As the population shrank, retailers and employers left the community. Dr. Catherine Peyroux, a community leader in Springfield, notes,

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, 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.<sup>6</sup>

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5. Berliner, *supra* note 3; 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-normal-gdp-growth-rates-will-be-impossible-unless-immigration-flows-are-sustained/>.

6. Dr. Catherine Peyroux Decl. ¶ 8 (Feb. 24, 2026), <https://www.ablelaw.org/media/2124/peyroux-declaration-final-signed.pdf>.

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.<sup>7</sup>

By 2020, the city's population had declined to approximately 58,000 residents.<sup>8</sup> Springfield and Clark County were “in a mode of trying not to lose more, and clawing [their] way to keep what [they] still had.”<sup>9</sup> Efforts to attract new employers and execute major city projects were thwarted in large part by the COVID pandemic. The projects that survived the pandemic and created new jobs had trouble finding workers to fill them.<sup>10</sup> 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. A small Haitian community already existed in the city, as did initiatives like Welcome Springfield to welcome immigrants. Despite the many rumors of nefarious reasons existing to draw Haitians to Springfield, *Amicus* believes that Haitians came to Springfield because there were employment

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7. Berliner, *supra* note 3.

8. Schneider, *supra* note 3.

9. Flax Wilt Decl., *supra* note 4, ¶ 7.

10. *Id.* ¶ 8.

opportunities and they thought “it would be a safe community to live and raise their families.”<sup>11</sup> 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.

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 metalworking, food processing, healthcare, distribution, and automobile parts manufacturing. Employers stated Haitian workers were extremely valuable to businesses, accepting extra hours and easily passing required drug tests.<sup>12</sup> Governor of

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11. Pastor Dr. Carl Ruby Decl. ¶¶ 5-6 (Feb. 20, 2026), [https://www.ablelaw.org/media/2125/declaration-of-carl-ruby\\_signed.pdf](https://www.ablelaw.org/media/2125/declaration-of-carl-ruby_signed.pdf).

12. 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>; Ruby Decl., *supra* note 11, ¶ 13.

Ohio Mike DeWine has accurately stated that employers were able to fill jobs with Haitian workers that would not have been filled before.<sup>13</sup> 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."<sup>14</sup> Haitians opened businesses, including restaurants, markets, real estate agencies, and in-home healthcare agencies.<sup>15</sup>

Springfield quickly began to benefit economically from the choice Haitians made to settle and work there. Dr. Peyroux saw the benefits first-hand:

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

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13. 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/>.

14. 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>.

15. 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-Acommunity>.

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.<sup>16</sup>

Restaurants, a co-working space, shops, and a market have opened in recent years, bringing vibrancy to downtown Springfield.<sup>17</sup> Haitian TPS holders contributed an estimated \$91 million per year to Springfield's local economy, and throughout Ohio, they contributed \$21 million in annual state and local taxes.<sup>18</sup> The tax revenue from all this economic activity provided funds for improvements that benefit the broader community.<sup>19</sup>

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.<sup>20</sup> 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

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16. Peyroux Decl., *supra* note 6, ¶ 12 [sic].

17. 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/>.

18. *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/>.

19. Peyroux Decl., *supra* note 6, ¶ 11.

20. Schneider, *supra* note 3.

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 Lima, actually experienced job declines (-.3% and -1%, respectively).<sup>21</sup>

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.<sup>22</sup> There were concerns about stress on city infrastructure, healthcare, housing availability, and public benefits availability for the existing population.<sup>23</sup>

In 2023, a terrible tragedy struck the community when 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.<sup>24</sup>

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21. 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>.

22. Peyroux Decl., *supra* note 6, ¶ 10.

23. Ruby Decl., *supra* note 11, ¶ 14; Flax Wilt Decl., *supra* note 4, ¶ 12.

24. Ruby Decl., *supra* note 11, ¶ 9.

These comments activated residents like Pastor Dr. Carl Ruby, the Senior Pastor at Central Christian Church (“Central”) in Springfield. A pillar of the Springfield community, city officials have referred to Central as a “safe haven” in Springfield. Pastor Ruby remembers receiving a text message from a church member one night telling him to turn his television on to listen to the city commission meeting. He was horrified to hear the racially discriminatory rhetoric people were saying about the entire Haitian community at this commission meeting. He grieved for Aiden Clark and his family. He also felt compelled as a faith leader not to let the entire Haitian community be blamed and demeaned for a tragic accident. Aiden Clark’s own father renounced the use of his son’s death as a tool for hate at another commission meeting.<sup>25</sup>

Pastor Ruby immediately drove downtown to City Hall to testify and speak on behalf of Springfield community members who would not “stand for this kind of hate.” He spoke at several other commission meetings after that night, feeling driven by God to do what he could to prevent Springfield’s Haitian community from becoming a scapegoat.

After the accident, Pastor Ruby and other Springfield community leaders galvanized around the Haitian community. Pastor Ruby hosted meetings with faith leaders about the need to welcome Haitian neighbors and

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25. Jessica Orozco, *Aiden Clark’s dad begs Springfield, politicians: Stop using son to hate Haitians*, SPRINGFIELD NEWS-SUN (Apr. 6, 2026), [https://www.springfieldnewssun.com/news/aiden-clark-s-dad-begs-springfield-politicians-stop-using-son-to-hate-haitians/article\\_10abf79d-b265-5787-b6ef-15ba74776404.html](https://www.springfieldnewssun.com/news/aiden-clark-s-dad-begs-springfield-politicians-stop-using-son-to-hate-haitians/article_10abf79d-b265-5787-b6ef-15ba74776404.html).

defend against the hateful comments made against them.  
For Ruby,

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.<sup>26</sup>

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

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26. Ruby Decl., *supra* note 11, ¶ 4.

Haitian Coalition, where service providers and community leaders met every month to discuss ways to best serve Clark County residents, including Haitians.<sup>27</sup> 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.

Local law enforcement also adapted. The Springfield Police Division Chief regularly attended Haitian community events, recognizing the need to build trust with Haitian leaders. “Just her presence showed that she was showing up for them, that they were part of our community just like everyone else.”<sup>28</sup>

The Springfield City School District hired new English for Speakers of Other Languages (ESOL) teachers. This helped teachers learn new skills. The increased level of non-English speakers prompted the schools to apply for—and receive—state funding for a literacy initiative that “improved the reading levels of all the students in the test classroom.” The school also “developed and facilitated a bi-lingual certificate that could be used to the advantage of all students academically and in transitioning to employment.”<sup>29</sup>

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27. Brooke Spurlock and Stephen Starr, *What Springfield’s Haitian immigrants need*, SPRINGFIELD NEWS-SUN (Apr. 6, 2026), <https://www.springfieldnewssun.com/local/what-springfields-haitian-immigrants-need/JECTYAAFNJJFQXCHJM2BOXX4ZZU/>.

28. Ruby Decl., *supra* note 11, ¶ 14.

29. Peyroux Decl., *supra* note 6, ¶ 13.

As a teacher at Hayward Middle School during this time, Dr. Peyroux observed, “the influx of new Haitian students was a gift to the whole district and demonstrably a net positive for our city.”<sup>30</sup>

On May 18, 2023, the city hosted a Haitian Flag Day celebration in the park downtown. City leaders worked with local leaders to plan a festival that would “invite people to appreciate Haitian culture.” In addition to showcasing Haitian dance and food, a local health center brought a mobile health station to the event to provide assistance to Haitian and non-Haitian community members.<sup>31</sup>

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.<sup>32</sup> In meeting challenges posed by a sudden population increase of Haitian newcomers, Springfield implemented improvements that benefited all residents.

### **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

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30. *Id.* ¶ 14.

31. Jessica Orozco, *Haitian culture celebrated at inaugural Flag Day festival in Springfield park*, SPRINGFIELD NEWS-SUN (APR. 2, 2026), [https://www.springfieldnewssun.com/news/haitian-culture-celebrated-at-inaugural-flag-day-festival-in-springfield-park/article\\_536f9319-e1c1-51e7-b326-8ce9a64695ce.html](https://www.springfieldnewssun.com/news/haitian-culture-celebrated-at-inaugural-flag-day-festival-in-springfield-park/article_536f9319-e1c1-51e7-b326-8ce9a64695ce.html).

32. Ruby Decl., *supra* note 11, ¶ 14.

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.<sup>33</sup> 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.<sup>34</sup>

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

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33. Their comments were extensively reported, including Garsd, *supra* note 14; 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/>.

34. Ruby Decl., *supra* note 11, ¶ 33.

supremacist groups like the Proud Boys, the Aryan Freedom Network, and the Blood Tribe descended on Springfield, marching in the streets.<sup>35</sup>



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The city endured tremendous disruption. Bomb threats on September 12, 2024 caused emergency evacuations of multiple city, school, and county buildings.<sup>37</sup> Local

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35. 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>.

36. Jennifer Casto, Photograph of Blood Tribe with Swastika Flags in Front of Springfield City Hall (Aug. 2024) (on file with author); note: while this photograph was taken before the September 2024 presidential debate, residents witnessed similar displays by the Blood Tribe and other groups, which are well documented in the media; *see* notes 55 and 56, *supra*.

37. Kathryn Mobley and Kaitlyn Schroeder, *Springfield buildings given all clear after bomb threat, including two*

government entities received at least thirty-three bomb threats from September 12 through 16, 2024.<sup>38</sup> Threats were aimed at Springfield residents of all backgrounds who were seen to have supported the Haitian community in some manner. While none of the bomb threats came to fruition, authorities were required to investigate them, heightening fear in the Springfield community tremendously. Pastor Ruby recalls,

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.<sup>39</sup>

Pastor Ruby also received death threats. Central Christian Church, where Ruby serves as Senior Pastor, was vandalized.<sup>40</sup>

The city canceled the local late-September CultureFest, and several grocery stores temporarily

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*schools*, WYSO (Sep. 12, 2024, 10:40 AM), <https://www.wyso.org/news/2024-09-12/bomb-threat-issued-to-multiple-locations-in-springfield>.

38. 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>.

39. Ruby Decl., *supra* note 11, ¶ 19.

40. *Id.* ¶ 21.

evacuated and closed.<sup>41</sup> 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.<sup>42</sup> Dr. Peyroux stated,

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.<sup>43</sup>

The national attention and threats also harmed Springfield economically. People were too afraid to go to

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41. 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 (Apr. 6, 2026), <https://www.springfieldnewssun.com/news/at-least-2-grocery-stores-evacuated-in-springfield/UBNKF5KRXZCH3LY4N7H7RLLIOY/>.

42. 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>

43. Peyroux Decl., *supra* note 6, ¶ 14.

businesses in downtown Springfield, fearing bombings or other violence. Multiple organizations canceled plans to hold events at the county fairgrounds because they feared Springfield was “too unsafe.”<sup>44</sup> As a result, the events center at the fairgrounds lost important revenue. 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.<sup>45</sup> The labor force in Clark County shrank, decreasing around four percent from June 2024 to December 2025.<sup>46</sup> Local business growth declined as Haitians started leaving Springfield because they feared hate and deportation.<sup>47</sup>

*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

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44. Ruby Decl., *supra* note 11, ¶ 22.

45. *Id.* ¶ 23

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

47. 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>.

perpetrators in our community.”<sup>48</sup> *Amicus* declarants’ experiences are that the discriminatory comments made about Haitians eating dogs and cats in 2024 emboldened groups predisposed to white supremacist rhetoric and violence. 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.”<sup>49</sup>

Many Springfield community members came together in response, spending their resources for collective safety and organizing for unity. Faith communities had to spend vast resources on security measures. As Pastor Ruby notes,

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.

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

49. 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>.

Our church has been called a “safe haven” by city officials, and now we have to install bullet proof glass.<sup>50</sup>

School staff protected students from the turmoil in the outside community. As a local school teacher, Dr. Peyroux experienced that after the debate comments and their fallout, “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.”<sup>51</sup>

While a small faction of individuals still resist change,<sup>52</sup> many 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.”<sup>53</sup> In part because of these unifying efforts, many Haitians remained in Springfield, despite the threats.

#### **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,

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50. Ruby Decl., *supra* note 11, ¶ 20.

51. Peyroux Decl., *supra* note 6, ¶ 18.

52. *Id.* ¶ 15.

53. Ruby Decl., *supra* note 11, ¶ 25.

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.<sup>54</sup>

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 and were evacuated.<sup>55</sup> As discussed in Section III, *supra*,

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54. Jessica Orozco, *Springfield braces for 30-day targeted ICE surge after Haitian TPS ends*, SPRINGFIELD NEWS-SUN (Apr. 6, 2026), <https://www.springfieldnewssun.com/news/springfield-braces-for-30-day-targeted-ice-surge-next-week-as-haitian-tps-ends/L6425QVWEFFGLAKHHRYHYJ3WEM/>.

55. Jessica Orozco, *Bomb threats continue, state supporting Springfield safety forces*, SPRINGFIELD NEWS-SUN (Apr. 6, 2026), <https://www.springfieldnewssun.com/news/bomb-threats-continue-state-supporting-springfield-safety-forces/2YS4XDRUJ5HRHDLFSH4VJZB56Y/>; Jessica Orozco, 3

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. "The bomb threats and, consequently, the school closures and closures of government buildings have taken a toll on the everyday Americans that live in Springfield. They are afraid of sending their children to school. They are afraid of going to big events."<sup>56</sup> For example, an all-US citizen gospel choir in Springfield cancelled practices for the month of February out of fear for their safety. English language classes have been moved on-line for fear students will be targeted.<sup>57</sup>

In addition, Springfield residents fear risks to everyone from aggressive or violent ICE enforcement actions.<sup>58</sup>

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*Springfield houses of worship receive bomb threats*, SPRINGFIELD NEWS-SUN (Apr. 6, 2026) <https://www.springfieldnewssun.com/news/2-springfield-churches-receive-bomb-threats/L5VDGXNDVA6RIN5IMKKPITLSE/>; Ruby Decl., *supra* note 11, ¶ 26.

56. Ruby Decl., *supra* note 11, ¶ 27.

57. Peyroux Decl., *supra* note 6, ¶ 20.

58. Jenilee Borek, *NAACP town hall in Springfield tackles immigration enforcement concerns*, DAYTON 24/7 Now (Dec. 9,

Perhaps most important, 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. Many Haitians are now members of church congregations who Pastor Ruby and others 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

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2025), <https://dayton247now.com/news/local/naacp-town-hall-in-springfield-tackles-immigration-concerns>; Peyroux Decl., *supra* note 6, ¶ 31 (“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 deliver food to a neighbor, will I endanger them?”).

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.<sup>59</sup>

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 immigration status and, consequently, authorization to work lawfully in the United States. Springfield generates approximately eighty percent of its revenue from local income taxes.<sup>60</sup> 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.<sup>61</sup> 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

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59. Ruby Decl., *supra* note 11, ¶ 31.

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

61. Flax Wilt Decl., *supra* note 4, ¶ 20.

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.”<sup>62</sup> Put starkly by former Clark County Commissioner Melanie Flax Wilt, “ending TPS for Haitians would damage the local economy.”<sup>63</sup>

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.<sup>64</sup> If Haitians lose protections under TPS, “Those workers will be gone.”<sup>65</sup>

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62. Brooke Spurlock, *Clark County approves \$230M annual budget*, SPRINGFIELD NEWS-SUN (Apr. 6, 2026), [https://www.springfieldnewssun.com/news/clark-county-approves-230m-annual-budget/article\\_7f350334-c57a-56fa-861f-53eafbd68107.html](https://www.springfieldnewssun.com/news/clark-county-approves-230m-annual-budget/article_7f350334-c57a-56fa-861f-53eafbd68107.html).

63. Flax Wilt Decl., *supra* note 4, ¶ 19.

64. 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>.

65. Peyroux Decl., *supra* note 6, ¶ 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. Notes former Commissioner Flax Wilt,

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.<sup>66</sup>

In fact, the mere threat of TPS termination has already caused economic harm in Springfield. Some employers have disclosed to Pastor Ruby that they have “entire shifts” exclusively run by Haitian workers. The businesses were able to add an extra shift to their schedules due to the increased workforce the Haitian community brought, “which helped them grow their business significantly.” However, “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.”<sup>67</sup>

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

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66. Flax Wilt Decl., *supra* note 4, ¶ 20.

67. Ruby Decl., *supra* note 11, ¶ 30.

2024.<sup>68</sup> Ending TPS will harm the economy as described by Governor of Ohio Mike DeWine, 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.<sup>69</sup>

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.<sup>70</sup> The south side of Springfield may once again see its only grocery store close and the area will again become a food desert.<sup>71</sup> Instead of a trend of businesses opening, residents fear a return to retail

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68. *Id.* ¶ 24 (“But in the year after the-cats-and-the-dogs comment, Haitians started leaving Springfield because they felt unsafe, and the jobs left, too.”); Cornelius Frolik, *Springfield has the worst job losses in Ohio: Haiti TPS ending could make it worse*, SPRINGFIELD NEWS-SUN (Apr. 6, 2026) <https://www.springfieldnewssun.com/local/springfield-has-the-worst-job-losses-in-ohio-haiti-tps-ending-could-make-it-worse/ZCHAYTVFC5EFLCS6QJQTHV3NEI/>.

69. Perry, *supra* note 13.

70. Ruby Decl., *supra* note 11, ¶ 31.

71. Hasan Karim, *New grocery now serving Springfield residents in former food desert*, SPRINGFIELD NEWS-SUN (Apr. 6, 2026), <https://www.springfieldnewssun.com/news/new-springfield-grocery-serving-residents-in-former-food-desert-opens-its-doors/55QU7QOALBC73PERDALKYSPKPA/>; Peyroux Decl., *supra* note 6, ¶ 23.

closures, as before the Haitian community arrived,<sup>72</sup> which worries local leaders:

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 are in place only at one school on a recently repaired road, and it follows logically that the city will not have funds to place them at other schools if we face declining revenue.<sup>73</sup>

The bomb threats and, consequently, the school closures and closures of government buildings have

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72. *Target to close Springfield store this weekend*, SPRINGFIELD NEWS-SUN (Jan. 4, 2016), [https://www.springfieldnewssun.com/local/target-to-close-springfield-store-this-weekend/article\\_74ed86db-f2b3-54f0-8d78-6b4b11e3ccd4.html](https://www.springfieldnewssun.com/local/target-to-close-springfield-store-this-weekend/article_74ed86db-f2b3-54f0-8d78-6b4b11e3ccd4.html); *5 things to know about Kroger's move to close a Springfield store*, SPRINGFIELD NEWS-SUN (Aug. 2, 2018), [https://www.springfieldnewssun.com/5-things-to-know-about-kroger-s-move-to-close-a-springfield-store/article\\_024a94b9-cf17-5b87-bc3f-2ddb17593bfa.html](https://www.springfieldnewssun.com/5-things-to-know-about-kroger-s-move-to-close-a-springfield-store/article_024a94b9-cf17-5b87-bc3f-2ddb17593bfa.html). Some businesses are already on the brink. Ismael David Mujahid, *Haitian-owned business faces closure as immigrants flee Springfield*, SPRINGFIELD NEWS-SUN (Apr. 6, 2026), <https://www.springfieldnewssun.com/local/haitian-owned-business-faces-closure-as-immigrants-flee-springfield/JFXULISDYNE63LHYQDM2XDL37I/>

73. Peyroux Decl. *supra* note 6, ¶ 22.

taken a toll on the everyday Americans who live in Springfield. Springfield residents of all backgrounds share a “protective anxiety” for the entire community, particularly the safety of Springfield’s children.<sup>74</sup> 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.<sup>75</sup> 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.<sup>76</sup>

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74. *Id.*, ¶ 19; Ruby Decl., *supra* note 11, ¶ 27.

75. Peyroux Decl., *supra* note 6, ¶ 27.

76. 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).



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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 children have been born in Springfield to Haitian parents in recent years.<sup>78</sup> 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

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

78. Starr, *supra* note 15.

would exacerbate a system that is already overwhelmed as a result of the opioid crisis.<sup>79</sup> Further, DHS poses no alternative solution or plan to assist Haitian families with obtaining U.S. passports so the children can reunite with parents.<sup>80</sup>

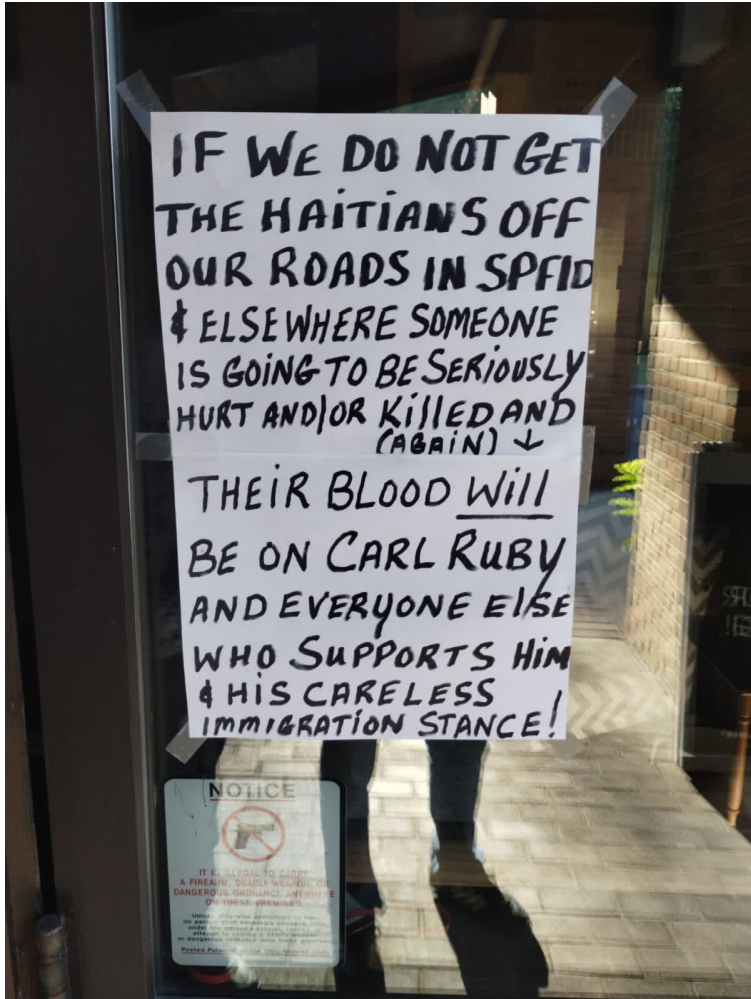
Faith communities will also be harmed if TPS for Haitians terminates. Several churches have already received threats of violence. Pastor Carl Ruby has received multiple death threats and continues to “receive multiple threatening calls every day” because of his support of the Haitian community.<sup>81</sup>

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79. 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>.

80. 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>.

81. Ruby Decl., *supra* note 11, ¶ 21.



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Despite these threats, Pastor Ruby and many other Springfield faith leaders continue their unwavering support of the Haitian community:

It is so clear to me that what I am called to do as a Christian is to stand alongside our Haitian

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

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.<sup>83</sup>

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.<sup>84</sup> 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.<sup>85</sup> 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-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.

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83. Ruby Decl., *supra* note 11, ¶ 33.

84. Flax Wilt Decl., *supra* note 4, ¶ 15.

85. Peyroux Decl., *supra* note 6, ¶ 6.

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 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. In sum, Haitian TPS holders have made the greater Springfield and Clark County “community open to making progress, and expanded our opportunities in every way.”<sup>86</sup>

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 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.”<sup>87</sup> *Amicus* asks

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86. Flax Wilt Decl., *supra* note 4, ¶ 15.

87. Ruby Decl., *supra* note 11, ¶ 33.

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,

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