

No. 25A326

IN THE
Supreme Court of the United States

KRISTI NOEM, SECRETARY OF HOMELAND SECURITY, ET AL.,

Applicants,

v.

NATIONAL TPS ALLIANCE, ET AL.,

Respondents.

On Application to Stay Judgment
Entered by the Northern District of California

**AMICUS BRIEF OF HAITIAN TPS HOLDERS
IN OPPOSITION TO STAY APPLICATION**

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TABLE OF CONTENTS

	Page
TABLE OF CONTENTS.....	i
TABLE OF AUTHORITIES	ii
INTEREST OF AMICI CURIAE.....	1
SUMMARY OF THE ARGUMENT	2
ARGUMENT	3
I. As illustrated by Haiti and Afghanistan, the TPS statute protects innocent people from grave dangers.....	3
A. Given Haiti’s humanitarian crisis, amici’s lives would be at risk without TPS.	4
B. Forcing Afghani TPS holders to return to Afghanistan would jeopardize their lives and liberty.	7
II. The TPS statute has long enjoyed bipartisan support.	9
CONCLUSION.....	12

TABLE OF AUTHORITIES

Page(s)

Statutes

8 U.S.C. § 1254a.....	1
8 U.S.C. § 1254a(b)(1)(C)	4

Regulations

Designation of Afghanistan for Temporary Protected Status, 87 Fed. Reg. 30976 (May 20, 2022).....	7, 8, 9
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Legislative Materials

136 Cong. Rec. 27132 (Oct. 2, 1990).....	9
H.R. 1689 – To require the Secretary of Homeland Security to designate Haiti for temporary protected status—119th Congress (2025-2026), https://www.congress.gov/bill/119th-congress/house-bill/ 1689/text/ih?format=txt	10

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INTEREST OF AMICI CURIAE

Amici curiae Fritz Miot, Rudolph Civil, Marlene Noble, Marica Laguerre, and Vilbrun Dorsainvil are Haitian immigrants protected by the TPS statute, 8 U.S.C. § 1254a.¹ They are the plaintiffs in *Miot v. Trump*, No. 1:25-cv-02471 (D.D.C.), which challenges Secretary Noem’s July 1, 2025, termination of Haiti’s TPS designation as unlawful under the Administrative Procedure Act insofar as the termination is both arbitrary and capricious and contrary to constitutional right and power.²

Amici, all of whom entered the country legally, have lived in the United States for years. Each has built a life in the United States. Fritz Miot, who was brought to this country as a child, is a Ph.D. candidate in neuroscience at Loma Linda University. Rudolph Civil, who left Haiti when he was seven, is a software engineer for one of the nation’s largest banks. Marlene Gail Noble was abandoned as infant in Haiti’s capital, Port-au-Prince, and brought to the U.S. by a faith-based group before being adopted by American parents whose immigration attorney failed to prepare the paperwork for Noble’s timely naturalization. Marica Laguerre, who likewise came to the U.S. as a child, is a college junior majoring in economics who currently works at

¹ No counsel for a party authored this brief in whole or in part and no such counsel or party made a monetary contribution intended to fund the preparation or submission of the brief. No one funded preparation of this brief other than counsel’s law firm

² The July 1, 2025, termination of Haiti’s TPS designation is not at issue in this case. To the extent it touches on Haiti, the judgment below addresses only the February 24, 2025, partial vacatur of Haiti’s TPS designation, not the July 1, 2025, termination of that designation. Regardless, Secretary Noem’s application asks that the judgment below be stayed only insofar as it addresses Venezuela’s TPS designation. Stay Appl. 7 n.6.

a fiduciary firm specializing in retirement planning and is slated to start a highly competitive internship at one of the nation's largest banks next summer. Vilbrun Dorsainvil was a doctor in Haiti and currently works as a registered nurse at Springfield Regional Medical Center in Springfield, Ohio.

If Haiti's TPS designation is terminated, amici would be subject to immediate deportation to Haiti, a dangerous country without a functioning government where gangs terrorize the populace, large swaths of which lack adequate food, housing, and medical care. Deportation would also wrench amici from their U.S.-citizen family members, including spouses, siblings, and parents. And even if not immediately deported, amici would suffer other irreparable harms upon termination of Haiti's TPS designation. They would be subject to indefinite detention and, detained or not, would in any event immediately lose their right to work in the United States—and thus the ability to support themselves, their families, and dependent relatives living in Haiti.

Although their case targets a different administrative action and presents additional legal issues, amici have a strong interest in the resolution of this case because the Court's decisions at this and later stages of the litigation could impact the resolution of the claims that amici assert in *Miot*.

SUMMARY OF THE ARGUMENT

The application currently before the Court involves only Venezuela but the TPS statute also protects individuals from many other countries. As of March 2025, seventeen countries were covered by TPS designations: Afghanistan, Burma, Cameroon, El Salvador, Ethiopia, Haiti, Honduras, Lebanon, Nepal, Nicaragua,

Somalia, South Sudan, Sudan, Syria, Ukraine, Venezuela, and Yemen. While the specifics vary, in each case it is unsafe for nationals of those countries to return home. To illustrate the grave dangers that TPS holders would face if deported, amici describe the deadly conditions that would await deported TPS holders in Haiti and Afghanistan.

When Congress enacted the TPS statute, it understood that wars, epidemics, natural disasters, and other crises sometimes make it impossible for foreign nationals present in the United States to return to their home countries in safety. Reflecting America's long-standing tradition of offering refuge to those in need, the TPS statute passed Congress with overwhelming bipartisan support. And even today, despite the polarized political environment, elected officials from both parties continue to support the statute. They understand that the TPS statute not only protects individuals who are unable to return home in safety but also benefits the American communities in which TPS holders have settled.

ARGUMENT

I. As illustrated by Haiti and Afghanistan, the TPS statute protects innocent people from grave dangers.

The TPS statute offers protection to individuals from many countries other than Venezuela. It provides them sanctuary when conditions in their home countries make it impossible for them to return safely. Haiti and Afghanistan are two such countries.

A. Given Haiti’s humanitarian crisis, amici’s lives would be at risk without TPS.

Haiti has been designated for TPS since 2010, when a massive earthquake tipped the already struggling country into a full-blown crisis. As recognized at the time, Haiti warranted TPS designation because, in the words of the statute, conditions in Haiti prevented Haitians “from returning to [Haiti] in safety.” 8 U.S.C. § 1254a(b)(1)(C). Since 2010, Haiti’s TPS designation has been repeatedly extended because that crisis has only intensified. Without a functioning government, Haiti is a nation in chaos. Rape, kidnapping, and murder are rampant while food, housing, and medical care are scarce.

Since the assassination of President Jovenel Moïse in 2021, armed gangs have gained control over much of [Haiti’s capital] Port-au-Prince, creating a power vacuum that has made governing a challenge and fueled further violence, homelessness and starvation. More than 5,600 people were killed and 1,400 were kidnapped amid gang conflicts last year, according to the United Nations. The violence has rendered 1 million people homeless in Haiti, forcing many into makeshift shelters and exacerbating the country’s economic challenges.³

Aware of these dire conditions, the State Department advises people to “not travel to Haiti for any reason.”⁴

Secretary Noem recognizes that “Haiti is in the grip of severe humanitarian and human rights crisis.” 90 Fed. Reg. 28760, 28763 (July 1, 2025) (citation modified).

³ Fredlyn Pierre Louis, *Haitian immigrants grapple with uncertainty as TPS end date looms*, NBC NEWS (March 8, 2025), <https://www.nbcnews.com/news/nbcblk/haitian-immigrants-grapple-uncertainty-tps-end-date-looms-rcna193868>.

⁴ U.S. Dep’t of State, Haiti Travel Advisory (July 15, 2025), <https://travel.state.gov/content/travel/en/traveladvisories/traveladvisories/haiti-travel-advisory.html>.

Indeed, in the very notice terminating Haiti's TPS designation she notes that "[a]rmed gangs are striking the Port-au-Prince metropolitan area and its surroundings with terror and violence, including rape and other forms of sexual violence" and that the unchecked violence "is sustained by the country's lack of functional government authority." *Id.* (citation modified).

Termination of Haiti's TPS designation would thrust amici into the midst of this lethal maelstrom. As the case of amicus Fritz Miot illustrates, the consequences would be grave, quite possibly fatal.

Amici would be marked for gang violence precisely because they have lived in the United States. Mr. Miot has explained that as someone who has "lived most of [his] life in the United States" and rarely speaks Haitian Creole, he "would stick out in Haiti as someone who had for years been living abroad in the United States." ECF 26-2 ¶ 10, *Miot v. Trump*, No. 1:25-cv-02471 (D.D.C.). That would make him, like other returning TPS holders, "a prime target" for kidnapping by the gangs that rule Haiti "because they would think that [he], as someone who has been in the United States for most of his life, would have money and/or would know people who have money to pay them a ransom for [his] release." *Id.* ¶ 11.⁵

Even if they did not fall victim to rape, murder, or other forms of gang violence, the termination of Haiti's TPS designation would endanger the lives of amici and

⁵ As one country expert notes, "[g]angs and armed groups" in Haiti "target Haitian Americans or U.S. citizens for kidnapping, believing that they are more likely to have wealthy individuals in their broader network." ECF 26-1 ¶ 83, *Miot v. Trump*, No. 1:25-cv-02471 (D.D.C.).

other Haitian TPS holders. Mr. Miot, for example, has Type 1 diabetes and must “inject [himself] with artificial insulin multiple times daily.” ECF 26-2 ¶ 7, *Miot v. Trump*, No. 1:25-cv-02471 (D.D.C.). Given “Haiti’s dysfunctional health care system” and the violence that has caused many doctors to flee the country, deportation to Haiti—where it is uncertain that he will be able to access either insulin or the specialized doctors he needs—would likely be a death sentence for Mr. Miot. *Id.* ¶¶ 7–8. Even if the requisite specialists were theoretically available, the mass exodus of medical professionals has significantly reduced the supply of doctors and caused a correspondingly significant increase in doctors’ fees, likely rendering the remaining doctors’ services “prohibitively expensive.” *Id.* ¶ 8. And even if they were theoretically available and affordable, “physically getting to a specialist ... would be difficult given the roadblocks and conditions of lawlessness and violence in the streets.” *Id.* If returned to Haiti, Mr. Miot and other TPS holders would be susceptible to “diseases like cholera, malaria, and dengue fever which are endemic to Haiti and ... regularly claim lives there but ... are rare and treatable in the United States.” *Id.* ¶ 9. Were Mr. Miot to contract “any one of these or other serious diseases,” his “Type 1 diabetes would make them more dangerous and potentially life-threatening to [him] than they would be for someone without [his] condition.” *Id.* TPS is all that stands between him and that lethal risk.

B. Forcing Afghani TPS holders to return to Afghanistan would jeopardize their lives and liberty.

Afghanistan was initially designated for TPS in 2022 after the U.S. withdrew and the Taliban regained power. 87 Fed. Reg. 30976 (May 20, 2022). The designation was subsequently extended through May 2025. 88 Fed. Reg. 65728 (Sept. 25, 2023). That month, Secretary Noem published a notice in the Federal Register terminating Afghanistan’s TPS designation. 90 Fed. Reg. 20309 (May 13, 2025). The legality of the termination is currently being litigated in *CASA v. Noem*, No. 8:25-cv-01484 (D. Md.).

“A significant portion of TPS recipients are Afghan evacuees who entered through Operation Allies Welcome after the fall of Kabul in 2021.”⁶ Operation Allies Welcome was a DHS-led “effort to resettle in the United States tens of thousands of Afghan nationals, many of whom assisted the United States and many of whom are vulnerable women and girls.”⁷ Some Afghani TPS holders who came to this country through Operation Allies Welcome are “still awaiting decisions on asylum, Special Immigrant Visas (SIVs), or other applications for permanent protection.”⁸ Others are ineligible for SIVs because Operation Allies Welcome evacuated not only interpreters

⁶ Global Refuge, TPS for Afghanistan Expires, Leaving Thousands at Risk of Deportation and Job Loss, <https://www.globalrefuge.org/news/tps-for-afghanistan-expires/> (July 21, 2025).

⁷ DHS, Secretary Mayorkas Delivers Remarks on Operation Allies Welcome (Sept. 3, 2021), <https://www.dhs.gov/archive/news/2021/09/03/secretary-mayorkas-delivers-remarks-operation-allies-welcome>.

⁸ TPS for Afghanistan Expires, *supra* n.6.

and others who worked for the U.S. directly but also “journalists, human rights activists, humanitarian workers, and other Afghans whose careers put them at risk, as well as family members of American citizens and lawful permanent residents.”⁹

If Afghani TPS holders are forced to return to Afghanistan, their lives and freedom will be in jeopardy. As it does with respect to Haiti, the State Department advises people to “not travel to Afghanistan due to civil unrest, crime, terrorism, risk of wrongful detention, kidnapping, and limited health facilities.”¹⁰ The risk of wrongful detention or worse is particularly acute for those who came to the United States through Operation Allies Welcome given the “climate of fear of retribution against those who are perceived to oppose the Taliban.” 88 Fed. Reg. at 65730.

Certain TPS holders—women and Hazaras, an ethnic and religious minority—would be especially vulnerable.

“Afghanistan under the Taliban remains extremely repressive, particularly with respect to the meaningful participation of women in all aspects of public and private life.” 88 Fed. Reg. at 65731.¹¹ “The Taliban have banned girls from attending secondary school past the sixth grade” (87 Fed. Reg. at 30983) and “[g]ender-based

⁹ U.S. Dep’t of Homeland Security, Operation Allies Welcome, https://www.dhs.gov/sites/default/files/publications/21_1110-opa-dhs-resettlement-of-at-risk-afghans.pdf.

¹⁰ U.S. Dep’t of State, Afghanistan Travel Advisory (July 15, 2025), <https://travel.state.gov/content/travel/en/traveladvisories/traveladvisories/afghanistan-advisory.html>.

¹¹ The May 13, 2025, notice terminating Afghanistan’s TPS designation is silent on the status of Afghani women but notes with approval that “[t]he Taliban government is promoting tourism.” 90 Fed. Reg. at 20310.

violence, including sexual violence against women and girls, occurs regularly.” 88 Fed. Reg. at 65731. If returned to Afghanistan, female TPS holders would be virtual prisoners, unable to leave their dwellings unless escorted by a designated male family member. *See* 87 Fed. Reg. at 30982.

Under the Taliban, Hazaras have been subjected to “forcible evictions, threats, physical harm, and attacks on religious institutions and education centers.” 88 Fed. Reg. at 65731. “[A]ttacks on members of the Hazara community are systematic in nature and reflect elements of an organizational policy.” *Id.* (citation modified).

Risk of retaliation, gender discrimination, and ethnic repression aside, TPS holders returned to Afghanistan would face dire conditions, “including lack of access to food, clean water, and healthcare, as well as destroyed infrastructure, internal displacement, and economic instability.” 88 Fed. Reg. at 65731.

II. The TPS statute has long enjoyed bipartisan support.

Protecting individuals from the types of harms faced by Haitian and Afghani TPS holders is the precise purpose of the TPS statute.

Congress created TPS to advance a core American principle: That the United States is a “beacon of freedom” to those displaced from their homelands by havoc beyond their control. 136 Cong. Rec. 27132 (Oct. 2, 1990) (statement of Rep. Moakley). Steeped in America’s humanitarian tradition, the TPS statute was enacted with broad bipartisan support. In the House, it was approved by a vote of 264-118, with a

majority of both Democrats (171-54) and Republicans (93-64) voting in favor.¹² In the Senate, it was approved by a vote of 89-8, again with majorities of both Democrats (51-3) and Republicans (38-5) voting in favor.¹³ Reflecting its bipartisan support, the TPS statute was signed into law by President George H.W. Bush, a Republican.

The TPS statute continues to enjoy bipartisan support even in today's polarized atmosphere. After Secretary Noem signaled the administration's intent to terminate Haiti's TPS designation, a bipartisan group of representatives introduced a bill, H.R. 1689, that would require the Secretary to extend Haiti's TPS designation through February 2027.¹⁴ Shortly before it was introduced, the bill's Republican co-sponsor, Rep. Mike Lawler, wrote President Trump "to encourage the Administration to keep [TPS] in place for Haitian citizens," explaining that "it is paramount" that Haiti's TPS designation be maintained and extended given the "severe crises" and "unprecedented instability" that have wracked Haiti since the assassination of President Moïse in 2021.¹⁵

¹² Clerk, U.S. House of Representatives, Roll Call 530 on Bill No. S-358 (Oct. 27, 1990), <https://clerk.house.gov/Votes/1990530>.

¹³ U.S. Senate, Roll Call Vote 101st Congress 2nd Session (Oct. 26, 1990), https://www.senate.gov/legislative/LIS/roll_call_votes/vote1012/vote_101_2_00323.htm.

¹⁴ H.R. 1689 – To require the Secretary of Homeland Security to designate Haiti for temporary protected status—119th Congress (2025–2026), <https://www.congress.gov/bill/119th-congress/house-bill/1689/text/ih?format=txt>.

¹⁵ Letter of Rep. Mike Lawler to President Trump (Feb. 19, 2025), https://www.instagram.com/p/DGT-JB1JIbM/?igsh=NXRvbzJoanBxd213&+img_index=1&img_index=1.

Rep. Lawler is far from the only Republican elected official to voice support for the TPS statute.

For example, recognizing that TPS holders “have strengthened [the city’s] local economy by filling key roles in manufacturing and health care,” the Republican mayor of Springfield, Ohio, has spoken in favor of Haiti’s continued designation.¹⁶ Underscoring that “individuals were given hope and a sense of security through the Temporary Protected Status policy, which has been embraced by several administrations,” the mayor declared that “[t]he United States must continue to be a beacon of hope and a torchbearer of democracy.”¹⁷

Ohio’s Republican governor, Mike DeWine, has likewise advocated for Haiti’s continued TPS designation—both for the sake of Haitians, who cannot safely return to their country, and for the sake of Ohio, whose communities depend on Haitian

¹⁶ At the September 10, 2024, presidential debate, President Trump falsely asserted that Haitian TPS holders in Springfield were “eating the dogs” and “eating the cats” of “the people that live there.” Riley Hoffman, *READ: Harris-Trump presidential debate transcript*, ABC NEWS (Sept. 10, 2024), <https://abcnews.go.com/Politics/harris-trump-presidential-debate-transcript/story?id=113560542>. Springfield’s city manager, Bryan Heck, a registered Republican (*see* <https://voterrecords.com/voter/31179429/bryan-heck>), called the assertion “disinformation.” Anastasiia Riddle, *Springfield city manager slams immigration ‘rumors’ and ‘disinformation’*, The Columbus Dispatch (Sept. 12, 2024), <https://www.dispatch.com/videos/news/politics/2024/09/12/watch-springfield-city-manager-refute-viral-immigrants-claims/75191623007/>.

¹⁷ Billal Rahman, *Springfield’s Republican Mayor Calls Out Trump’s Immigration Move*, NEWSWEEK (Feb. 24, 2025), <https://www.newsweek.com/rob-rue-springfield-trump-immigration-policy-haitian-tps-2035146>; *see also* Miriam Jordan, *Why Thousands of Haitians Have Settled in Springfield, Ohio*, N.Y. TIMES (Sept. 14, 2024), <https://www.nytimes.com/2024/09/14/us/haitian-migrants-springfield-ohio.html>.

workers. Governor DeWine said that TPS protection is vital for Haitian TPS holders—whom he describes as “hardworking people” who “care about their families”—because Haiti, “a horribly, horribly violent place,” is “one of the most dangerous places in the world.”¹⁸ Haiti’s continued TPS designation is also important for Ohio’s economy, said the governor, because “if we didn’t have these Haitians, we couldn’t fill these slots, and we can’t produce what we need to produce.”¹⁹

The TPS statute is, in short, a humanitarian statute with support across the political spectrum.

CONCLUSION

The Court should deny the stay application.

Respectfully submitted,

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¹⁸ Karen Kasler, *DeWine: there will ‘certainly be something’ he’ll veto in Ohio budget, but he offers few hints*, STATEHOUSE NEWS BUREAU (June 28, 2025), <https://www.stateneews.org/government-politics/2025-06-28/dewine-there-will-certainly-be-something-hell-veto-in-ohio-budget-but-he-offers-few-hints> (citation modified).

¹⁹ *Id.* (citation modified).

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