

Appeal No. 25-5724

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

National TPS Alliance, et al., Plaintiffs-Appellees,

v.

Kristi Noem, et al., Defendants-Appellants.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
CASE No. 3:25-cv-1766

**BRIEF OF AMICI CURIAE 14 LOCAL GOVERNMENTS IN SUPPORT OF PLAINTIFFS-
APPELLEES**

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CORPORATE DISCLOSURE STATEMENT

Pursuant to Federal Rule of Appellate Procedure 26.1, amici curiae all are political subdivisions for whom no corporate disclosure is required.

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Statutes	
8 U.S.C. § 1254a(a)(1).....	1
8 U.S.C. § 1254a(d)(4).....	1
Other Authorities	
Abigail F. Kolker & Elayne J. Heisler, Cong. Rsch. Serv., R47351, <i>Noncitizens’ Access to Health Care</i> , https://www.congress.gov/crs-product/R47351	20
ACLU, <i>Freezing Out Justice</i> (2018), https://assets.aclu.org/live/uploads/publications/rep18-icecourthouse-combined-rel01.pdf	12
Alison Moodie, <i>TPS for Venezuelans Is Ending—What Employers Should Do Next</i> , Boundless (July 25, 2025), https://www.boundless.com/blog/tps-venezuelans-end-impact-employers#industries-most-affected	9
Allen Dobson et al., <i>Comparing the Affordable Care Act’s Financial Impact on Safety-Net Hospitals in States That Expanded Medicaid and Those That Did Not</i> , The Commonwealth Fund (Nov. 21, 2017), https://www.commonwealthfund.org/publications/issue-briefs/2017/nov/comparing-affordable-care-acts-financial-impact-safety-net....	21
Ana Alanis Amaya & Jeanne Batalova, <i>Venezuelan Immigrants in the United States</i> (Feb. 6, 2025), https://www.migrationpolicy.org/article/venezuelan-immigrants-united-states-2025#distribution	5
Beatrice Dain & Jeanne Batalova, <i>Haitian Immigrants in the United States</i> , Migration Policy Institute (Nov. 8, 2023), https://www.migrationpolicy.org/article/haitian-immigrants-united-states-2022	5
Charles Nelson, et al., <i>Adversity in Childhood Is Linked to Mental and Physical Health Throughout Life</i> , BMJ (Oct. 28, 2020), https://www.bmj.com/content/371/bmj.m3048	18
<i>Community Policing Plan FY 2025</i> , Los Angeles Cnty. Sheriff’s Dept., Transit Services Bureau (2025), https://lasd.org/wp-content/uploads/2024/07/Community-Policing-Plan-FY2025.pdf	11
Cristina Muñoz de la Peña et al., <i>Working with Parents and Children Separated at the Border: Examining the Impact of the Zero Tolerance Policy And Beyond</i> , 12 J. of Child & Adolescent Trauma 153 (2019), https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7163859	18

TABLE OF AUTHORITIES

(continued)

Page(s)

<i>Decline in Reporting of Crime Among Hispanic Population</i> , L.A. Police Dep't (Mar. 21, 2017), https://www.lapdonline.org/newsroom/decline-in-reporting-of-crime-among-hispanic-population-nr17083ma/	13
Drishti Pillai et al., <i>Living in an Undocumented Immigrant Family Under the Second Trump Administration: Fear, Uncertainty, and Impacts on Health and Well-Being</i> , KFF (May 8, 2025), https://www.kff.org/racial-equity-and-health-policy/issue-brief/living-in-an-undocumented-immigrant-family-under-the-second-trump-administration-fear-uncertainty-and-impacts-on-health-and-well-being/	22
Editorial Board, <i>The Economic Drain of Mass Deportation</i> , Wall Street Journal (July 9, 2025), https://www.wsj.com/opinion/donald-trump-mass-deportations-workforce-immigrants-economic-growth-brooke-rollins-f1e1999d?msockid=12206f7a49fc6272073a79e7485163b7	8
Elisa Jácome, <i>The Effect of Immigration Enforcement on Crime Reporting: Evidence from the Priority Enforcement Program</i> , 128 J. Urb. Econ. 103395 (Mar. 2022), https://www.sciencedirect.com/science/article/abs/pii/S0094119021000772?via%3Dihub	15
Forum Together, <i>Temporary Protected Status (TPS): Fact Sheet</i> (Oct. 6, 2025), https://forumtogether.org/article/temporary-protected-status-fact-sheet/	5
Frank Stoltze, <i>LAPD Takes Some Credit for Easing Immigrants' Fears of Reporting Crimes</i> , LAist (Apr. 24, 2018), https://laist.com/news/kpcc-archive/lapd-reports-progress-in-easing-immigrants-fears-o	15
Grace Kim et al., <i>Should Immigration Status Information Be Included in a Patient's Health Record?</i> , AMA J. of Ethics (Jan. 2019), https://journalofethics.ama-assn.org/article/should-immigration-status-information-be-included-patients-health-record/2019-01	19
International Institute of New England, <i>IINE Statement on Suspension of TPS for Nearly 500,000 Haitian Immigrants</i> (Feb. 21, 2025), https://iine.org/2025/02/iine-statement-on-tps-suspension-haiti/#:~:text=Massachusetts%20alone%20hosts%20the%20third%20largest%20Haitian,our%20friends%2C%20neighbors%2C%20colleagues%2C%20and%20essential%20workers	5

TABLE OF AUTHORITIES

(continued)

Page(s)

James Queally, <i>Fearing Deportation, Many Domestic Violence Victims Are Steering Clear of Police and Courts</i> , L.A. Times (Oct. 9, 2017), https://tinyurl.com/Undocumented-Crime-Reporting	12
Jennifer Bisram, <i>NYC Officials Call on Trump Administration to Stop TPS Rollback for Haitians</i> , CBS News (Feb. 27, 2025), https://www.cbsnews.com/newyork/news/nyc-tps-rollback-canceled-haiti/	5
Jennifer Tolbert et al., <i>Key Facts About the Uninsured Population</i> , KFF (Dec. 18, 2024), https://www.kff.org/uninsured/issue-brief/key-facts-about-the-uninsured-population/	20, 21
Johayra Bouza et al., <i>The Science Is Clear: Separating Families Has Long-term Damaging Psychological & Health Consequences for Children, Families, and Communities</i> , Soc’y For Rsch. in Child Dev. (June 20, 2018), https://www.srcd.org/briefs-fact-sheets/the-science-is-clear	18
John Burnett, <i>New Immigration Crackdowns Creating ‘Chilling Effect’ on Crime Reporting</i> , NPR (May 25, 2017), https://www.npr.org/2017/05/25/529513771/new-immigration-crackdowns-creating-chilling-effect-on-crime-reporting	12
Karen Aho, <i>Spotlight on the Economic Contributions of TPS Holders</i> , Am. Immigr. Council (Oct. 23, 2023), https://www.americanimmigrationcouncil.org/blog/economic-contributions-tps-holders/	11
<i>Key Health Implications of Separation of Families at the Border</i> , KFF (June 27, 2018), https://www.kff.org/racial-equity-and-health-policy/fact-sheet/key-health-implications-of-separation-of-families-at-the-border/#footnote-260162-13	18
<i>LAPD On Sexual Assault, Domestic Violence</i> , Canyon News (May 7, 2018), https://www.canyon-news.com/lapd-on-sexual-assault-domestic-violence/	15
Lisa Fortuna, et al., <i>Special Report: U.S. Immigration Policy and the Mental Health of Children and Families</i> , Psychiatry Online (July 25, 2025), https://psychiatryonline.org/doi/epub/10.1176/appi.pn.2025.08.8.19	19
Matthew Lisiecki and Kevin Appleby, <i>Venezuelan And Haitian TPS Beneficiaries Contribute to the Nation And Should Not Be Deported</i> , Center for Migration Studies (May 22, 2025), https://cmsny.org/venezuelan-and-haitian-tps-beneficiaries-contribute-to-the-nation-and-should-not-be-deported/	4, 7, 20

TABLE OF AUTHORITIES

(continued)

Page(s)

Meg Anderson, <i>Police Say ICE Tactics Are Eroding Public Trust in Local Law Enforcement</i> , NPR (Mar. 30, 2025), https://www.npr.org/2025/03/30/nx-s1-5304236/police-say-ice-tactics-are-eroding-public-trust-in-local-law-enforcement	14
Michael Hiltzik, <i>A Punitive Trump Proposal Stokes Panic Among Immigrants—Even Before It’s Official</i> , L.A. Times (Aug. 24, 2018), http://www.latimes.com/business/hiltzik/la-fi-hiltzik-public-charge-20180824-story.html	20
Migration Policy Institute, <i>U.S. Immigrant Population by Metropolitan Area, 2019-2023</i> , https://www.migrationpolicy.org/programs/data-hub/charts/us-immigrant-population-metropolitan-area	5, 17
Migration Policy Institute, <i>U.S. Immigrant Population by State and County</i> , https://www.migrationpolicy.org/programs/data-hub/charts/us-immigrant-population-state-and-county?width=850&height=850&iframe=true	6
Miriam Jordan et al., <i>Immigrant Communities in Hiding: People Think ICE Is Everywhere</i> , N.Y. Times (Jan. 30, 2025), https://www.nytimes.com/2025/01/30/us/immigrant-communities-hiding-ice.html	16
Neilsberg, <i>Haitian Population in California by County: 2025 Ranking & Insights</i> , https://www.neilsberg.com/insights/lists/haitian-population-in-california-by-county/ (last visited Nov. 11, 2025)	6
Neilsberg, <i>Venezuelan Population in Los Angeles County, CA by City: 2025 Ranking & Insights</i> , https://www.neilsberg.com/insights/lists/venezuelan-population-in-los-angeles-county-ca-by-city/ (last visited Nov. 11, 2025)	6
New York State Attorney General, <i>Attorney General James Defends Temporary Protected Status for Haitian and Venezuelan Immigrants</i> (Mar. 25, 2025), https://ag.ny.gov/press-release/2025/attorney-general-james-defends-temporary-protected-status-haitian-and-venezuelan	17
Nicole Svajlenka et. al., <i>TPS Holders Are Integral Members of the U.S. Economy and Society</i> , Ctr. for Am. Progress (Oct. 20, 2017), https://www.americanprogress.org/article/tps-holders-are-integral-members-of-the-u-s-economy-and-society/	9
Nicole Svajlenka, <i>What Do We Know About Immigrants With Temporary Protected Status?</i> , Ctr. For Am. Progress (Feb. 11, 2019), https://www.americanprogress.org/article/know-immigrants-temporary-	

TABLE OF AUTHORITIES

(continued)

Page(s)

protected-status/; <i>Temporary Protected Status Protects Families While Also Boosting the U.S. Economy</i> (Mar. 21, 2025)	8
Nik Theodore, <i>Insecure Communities: Latino Perceptions of Police Involvement in Immigration Enforcement</i> , Dep't. of Urb. Plan. & Pol'y, Univ. of Ill. at Chi. 1 (May 2013), https://greatcities.uic.edu/wp-content/uploads/2014/05/Insecure_Communities_Report_FINAL.pdf	13
<i>Overcoming the Odds: The Contributions of DACA-Eligible Immigrants And TPS Holders to the U.S. Economy</i> , Am. Immigr. Council (June 3, 2019), https://www.americanimmigrationcouncil.org/report/overcoming-the-odds-the-contributions-of-daca-eligible-immigrants-and-tps-holders-to-the-u-s-economy/	6
Randy Capps et al., <i>Delegation and Divergence: A Study of 287(g) State and Local Immigration Enforcement</i> , Migration Policy Inst. (Jan. 2011), https://www.migrationpolicy.org/research/delegation-and-divergence-287g-state-and-local-immigration-enforcement	16
Ricardo D. Martinez-Schuldt et al., <i>Immigrant Sanctuary Policies and Crime Reporting Behavior: A Multilevel Analysis of Reports of Crime Victimization to Law Enforcement, 1980 to 2004</i> , 86 Am. Sociological Rev. 154 (2021). 11, 15	
Robert Warren & Donald Kerwin, <i>A Statistical and Demographic Profile of the US Temporary Protected Status Populations from El Salvador, Honduras, and Haiti</i> , 5 J. on Migration & Hum. Sec. 577 (2017), https://journals.sagepub.com/doi/pdf/10.1177/233150241700500302	6
Roxanne P. Kerani & Helena A. Kwakwa, <i>Scaring Undocumented Immigrants Is Detrimental to Public Health</i> , 9 Am. J. Pub. Health 1165-1166 (Sept. 2018), https://pmc.ncbi.nlm.nih.gov/articles/PMC6085039/	21, 22
Scott D. Rhodes et al., <i>The Impact of Local Immigration Enforcement Policies on the Health of Immigrant Hispanics/Latinos in the United States</i> , 105 Am. J. Pub. Health 329 (2015).....	21
<i>Sheriff Luna on Trump's Mass Deportation Plans: 'We Will Not Start Asking About Immigration Status'</i> , KABC (Nov. 22, 2024), https://www.msn.com/en-us/news/us/sheriff-luna-on-trumps-mass-deportation-plans-we-will-not-start-asking-about-immigration-status/ar-AA1uzwAz	15
Shreyas Teegala, <i>Fearing Ice Raids, Some LA Residents Skip Doctor's Visits: 'Everybody's Life Is on Pause'</i> , The Guardian (Jun. 24, 2025),	

TABLE OF AUTHORITIES

(continued)

Page(s)

https://www.theguardian.com/us-news/2025/jun/24/ice-raids-healthcare-los-angeles-ohio	22
<i>Statement on Sexual Assault And Domestic Violence Reporting in Immigrant Communities</i> , L.A. Police Dep’t (Apr. 27, 2018), https://lapdblog.typepad.com/lapd_blog/2018/04/statement-on-sexual-assault-and-domestic-violence-reporting-in-immigrant-communities.html	15
Stefano Comino et al., <i>Silence of the Innocents: Undocumented Immigrants’ Underreporting of Crime and Their Victimization</i> , 39 J. Pol’y Analysis & Mgmt. 1214 (2020), https://doi.org/10.1002/pam.22221	13
<i>Temporary Protected Status Protects Families While Also Boosting the U.S. Economy</i> (Feb. 2024), https://www.fwd.us/wp-content/uploads/2024/02/FWD_TPSIIIRreport.pdf	6, 8, 17
<i>Temporary Protected Status Protects Families While Also Boosting the U.S. Economy</i> , FWD.us (Mar. 21, 2025), https://www.fwd.us/news/temporary-protected-status-report-2025/	7, 16, 17
Teresa A. Coughlin et al., <i>Sources of Payment for Uncompensated Care for the Uninsured</i> , KFF (Apr. 6, 2021), https://www.kff.org/uninsured/issue-brief/sources-of-payment-for-uncompensated-care-for-the-uninsured/	21
<i>The Contributions of Temporary Protected Status Holders to the U.S. Economy</i> , Am. Immigr. Council (Sept. 2023), https://www.americanimmigrationcouncil.org/wp-content/uploads/2025/01/contributionstemporaryprotectedstatus_0923.pdf ... 7, 8, 10, 11	
Tom K. Wong, <i>Sanctuary Cities Don’t ‘Breed Crime.’ They Encourage People to Report Crime</i> , Wash. Post (Apr. 24, 2018), https://www.washingtonpost.com/news/monkey-cage/wp/2018/04/24/sanctuary-cities-dont-breed-crime-they-encourage-people-to-report-crime	12
Tom K. Wong, <i>The Effects of Sanctuary Policies on Crime and the Economy</i> , Ctr. for Am. Progress (Jan. 26, 2017), https://www.americanprogress.org/article/the-effects-of-sanctuary-policies-on-crime-and-the-economy/	13
<i>TPS Holders in California</i> , Ctr. for Am. Progress, https://www.americanprogress.org/wp-	

TABLE OF AUTHORITIES

(continued)

Page(s)

content/uploads/sites/2/2017/10/101717_TPSFactsheet-CA.pdf (last visited Nov. 4, 2025).....9

TPS Holders in Colorado, Ctr. for Am. Progress,
https://www.americanprogress.org/wp-content/uploads/sites/2/2017/10/101717_TPSFactsheet-CO.pdf (last visited Nov. 4, 2025).....9

TPS Holders in Massachusetts, Ctr. for Am. Progress,
https://www.americanprogress.org/wp-content/uploads/sites/2/2017/10/101717_TPSFactsheet-MA.pdf (last visited Nov. 9, 2025).....10

TPS Holders in New York, Ctr. for Am. Progress,
https://www.americanprogress.org/wp-content/uploads/sites/2/2017/10/101717_TPSFactsheet-NY.pdf.....9

Regulations

90 Fed. Reg. 10512 (Feb. 24, 2025),
<https://www.federalregister.gov/documents/2025/02/24/2025-02970/partial-vacatur-of-2024-temporary-protected-status-decision-for-haiti>17

90 Fed. Reg. 9041 (Feb. 5, 2025),
<https://www.federalregister.gov/documents/2025/02/05/2025-02294/termination-of-the-october-3-2023-designation-of-venezuela-for-temporary-protected-status>.....17

INTERESTS OF AMICI CURIAE¹

Amici curiae comprise 14 cities and counties.² From urban metropolises to smaller communities, amici include some of the most populous and diverse cities and counties in the United States, as well as jurisdictions of more modest size. Together, amici represent a broad cross-section of American communities and a wide spectrum of economic, political, and cultural perspectives. Individuals of every race, ethnicity, nationality, culture, and creed call amici home.

The Temporary Protected Status (“TPS”) program, which grants protection from deportation and confers work authorization, *see* 8 U.S.C. § 1254a(a)(1), (d)(4), enables hundreds of thousands of immigrants to reside in amici’s communities and lead lives indistinguishable from their citizen-neighbors. By statutory definition, these individuals cannot return safely to their home countries because of armed conflict, natural disaster, or other extraordinary circumstances.

Most TPS holders have, over years and in many cases decades, formed

¹ All parties have consented to the filing of this amicus brief. Pursuant to Federal Rule of Appellate Procedure 29(a)(4)(E), the undersigned counsel certifies that this brief was authored in full by Amici and their counsel, no party or counsel for a party authored or contributed monetarily to this brief in any respect, and no other person or entity—other than Amici and their counsel—contributed monetarily to this brief’s preparation or submission.

² Amici include the City of Boston, Massachusetts; County of Boulder, Colorado; City of Cambridge, Massachusetts; City of Los Angeles, California; County of Los Angeles, California; City of Minneapolis, Minnesota; City of New York, New York; City of Oakland, California; City of Portland, Oregon; City of Saint Paul, Minnesota; City of San Diego, California; City and County of San Francisco, California; County of Santa Clara, California; and City of West Hollywood, California.

families, purchased homes, started businesses, invested their savings in their dreams, and otherwise laid roots in amici's communities. For many TPS holders, the United States is the only home they truly know.

Despite the benefits that TPS recipients bring to amici's communities, Defendants purported to vacate the TPS extensions previously granted to Venezuela and Haiti and terminate each country's TPS designation. The district court properly granted summary judgment to restrain Defendants' unlawful actions and enjoin the TPS termination for Venezuela and vacatur for Haiti. Amici have a strong interest in ensuring the district court's order is affirmed, as Defendants' unlawful decision to revoke TPS for Venezuela and Haiti not only threatens TPS recipients and their families, but also will materially harm amici and their communities.

As our nation's history proves, the collective success of amici's communities depends on the contributions of all residents—TPS holders included. The tens of thousands of TPS holders from Venezuela and Haiti who have built lives and families in amici's communities will drive amici's future growth and prosperity. Amici therefore urge the Court to affirm the district court's summary judgment ruling.

ARGUMENT

Terminating TPS for Venezuela and vacating Haiti's TPS extension would

irreparably harm amici's residents and communities.³ TPS holders from these countries are valued members of amici's communities, and ending TPS would be devastating for individual TPS recipients, their families, and amici. TPS holders have created lives in this country and are entrenched in amici's communities. Many TPS recipients have lived in the United States for decades. They are married to U.S. citizens and have U.S.-citizen children. They contribute to their local economies as consumers, taxpayers, and workforce participants. And they contribute to the vibrancy of their communities as neighbors, volunteers, fellow churchgoers, and members of civic associations.

If the Court permits the sudden termination of TPS for Venezuela and Haiti to take effect, many TPS recipients will be left with the terrible choice of either remaining in the United States without any protected status, or uprooting their lives, leaving their U.S.-citizen family members, resigning from their jobs, quitting their schooling, and returning to Venezuela or Haiti. Either option carries negative consequences for amici and their communities.

Individuals who remain in the country will lose the work authorization conferred by TPS. This will render them unable to financially support their families and will reduce their ability to contribute to the local, state, and federal economy.

³ This brief refers to "terminating" or "ending" TPS for Venezuela and Haiti to refer to Defendants' termination of TPS for Venezuela and vacatur of the extension of TPS for Haiti.

Those who remain will see reduced access to health insurance, and they may avoid seeking preventive care out of fear their information will be shared with immigration enforcement, thereby worsening public health outcomes and increasing the safety net health care costs borne by some amici jurisdictions. Individuals who remain will also be more reluctant to cooperate with local law enforcement out of similar fear of immigration consequences, which will undermine public safety in amici's communities and harm amici's ability to effectively carry out local law enforcement initiatives.

The departure of individuals who decide to return to their home countries—countries that are still plagued by ongoing economic, security, political, and health crises—will harm individuals remaining in the United States. The termination of TPS undoubtedly will separate families. Family members who remain in the United States, including U.S.-citizen children, will suffer immense emotional, mental, and economic harm as a result. And amici will suffer in the short- and long-term when vital members of their communities and local workforces are forced to suddenly depart, depriving amici of the benefits brought by those community members.

I. TPS RECIPIENTS ARE DEEPLY INTEGRATED INTO AMICI'S COMMUNITIES

TPS holders are deeply integrated in their local communities and their absence would have wide-reaching consequences. Hundreds of thousands of individuals will

be affected if TPS is terminated for Venezuela and Haiti.⁴ As of March 2025, there were over 600,000 Venezuelan TPS holders living in the United States and over 330,000 Haitian TPS holders. These individuals call amici's communities home.⁵ As many as 30% of Haitian immigrants and 10% of Venezuelan immigrants live in amici's communities.⁶ Over 5,000 Haitian TPS holders live in New York City alone, and the New York metro area is home to around 30,000 Venezuelan immigrants.⁷ Another 15,000 Haitian TPS holders reside in Massachusetts, a significant proportion of whom are located in Boston, which is home to around 90% of the state's overall population of Haitian immigrants.⁸ Over 5,000 Haitian immigrants

⁴ Matthew Lisiecki and Kevin Appleby, *Venezuelan And Haitian TPS Beneficiaries Contribute to the Nation And Should Not Be Deported*, Center for Migration Studies (May 22, 2025), <https://cmsny.org/venezuelan-and-haitian-tps-beneficiaries-contribute-to-the-nation-and-should-not-be-deported/>.

⁵ Forum Together, *Temporary Protected Status (TPS): Fact Sheet* (Oct. 6, 2025), <https://forumtogether.org/article/temporary-protected-status-fact-sheet/> (estimating 605,015 individuals with TPS from Venezuela and 330,735 individuals with TPS from Haiti).

⁶ Migration Policy Institute, *U.S. Immigrant Population by Metropolitan Area, 2019-2023*, <https://www.migrationpolicy.org/programs/data-hub/charts/us-immigrant-population-metropolitan-area> (describing population statistics for Los Angeles County, New York, Newark, Jersey City Area, Boston-Cambridge-Newton Area, Denver-Aurora-Centennial Area, and San Francisco-Oakland-Fremont area).

⁷ Jennifer Bislam, *NYC Officials Call on Trump Administration to Stop TPS Rollback for Haitians*, CBS News (Feb. 27, 2025), <https://www.cbsnews.com/newyork/news/nyc-tps-rollback-canceled-haiti/>; Ana Alanis Amaya & Jeanne Batalova, *Venezuelan Immigrants in the United States* (Feb. 6, 2025), <https://www.migrationpolicy.org/article/venezuelan-immigrants-united-states-2025#distribution>.

⁸ International Institute of New England, *IINE Statement on Suspension of TPS for Nearly 500,000 Haitian Immigrants* (Feb. 21, 2025), <https://iine.org/2025/02/iine-statement-on-tps-suspension-haiti/#:~:text=Massachusetts%20alone%20hosts%20the%20third%20largest%20Haitian,>

and over 8,500 Venezuelan immigrants reside in Los Angeles County⁹, some of whom are TPS holders.

Many TPS recipients are long-term residents of the United States.¹⁰ Haiti, for example, was first designated for TPS in 2010.¹¹ A significant proportion of TPS holders arrived in the United States at a very young age.¹² For example, according to data published in 2017, 30% of Haitian TPS recipients arrived in the United States when they were age 15 or under, and 16% have lived in the United States for 20

our%20friends%2C%20neighbors%2C%20colleagues%2C%20and%20essential%20workers (approximately 15,000 TPS holders in Massachusetts); Beatrice Dain & Jeanne Batalova, *Haitian Immigrants in the United States*, Migration Policy Institute (Nov. 8, 2023), <https://www.migrationpolicy.org/article/haitian-immigrants-united-states-2022> (55,000 Haitian immigrants reside in Boston metro area); Migration Policy Institute, *U.S. Immigrant Population by State and County*, <https://www.migrationpolicy.org/programs/data-hub/charts/us-immigrant-population-state-and-county?width=850&height=850&iframe=true> (59,3000 Haitian immigrants reside in state of Massachusetts).

⁹ Neilsberg, *Haitian Population in California by County: 2025 Ranking & Insights*, <https://www.neilsberg.com/insights/lists/haitian-population-in-california-by-county/> (last visited Nov. 11, 2025); Neilsberg, *Venezuelan Population in Los Angeles County, CA by City: 2025 Ranking & Insights*, <https://www.neilsberg.com/insights/lists/venezuelan-population-in-los-angeles-county-ca-by-city/> (last visited Nov. 11, 2025).

¹⁰ *Overcoming the Odds: The Contributions of DACA-Eligible Immigrants And TPS Holders to the U.S. Economy*, Am. Immigr. Council (June 3, 2019), <https://www.americanimmigrationcouncil.org/report/overcoming-the-odds-the-contributions-of-daca-eligible-immigrants-and-tps-holders-to-the-u-s-economy/>.

¹¹ *Temporary Protected Status Protects Families While Also Boosting the U.S. Economy*, at 6 (Feb. 2024), https://www.fwd.us/wp-content/uploads/2024/02/FWD_TPSIIIRreport.pdf.

¹² Robert Warren & Donald Kerwin, *A Statistical and Demographic Profile of the US Temporary Protected Status Populations from El Salvador, Honduras, and Haiti*, 5 J. on Migration & Hum. Sec. 577, 581 (2017), <https://journals.sagepub.com/doi/pdf/10.1177/233150241700500302>.

years or more.¹³

In the time they have resided in the United States, TPS holders have built lives and families in amici's communities. There are an estimated 260,000 U.S.-citizen children living with at least one TPS holder parent in the United States.¹⁴ Approximately 44,000 of those U.S.-citizen children have a Venezuelan parent who is a TPS holder, and approximately 34,300 have a Haitian parent who is a TPS holder.¹⁵ About half of Venezuelan nationals eligible for TPS reside in a mixed-status household with a U.S. citizen or legal permanent resident, as do just under a third of eligible Haitian nationals.¹⁶

In addition to these family ties, TPS holders are strongly integrated into their communities in other ways. As of 2021, more than 41% of U.S. households with TPS recipients had purchased their homes.¹⁷ TPS homeowners contribute at least \$19 billion in housing value nationally, adding to their communities' housing wealth and property tax revenues, an important source of funding for amici.¹⁸

Given the large number of Venezuelan and Haitian TPS holders and their deep

¹³ *Id.*

¹⁴ *Temporary Protected Status Protects Families While Also Boosting the U.S. Economy*, FWD.us (Mar. 21, 2025), <https://www.fwd.us/news/temporary-protected-status-report-2025/> (estimating figure based on status of TPS program as of March 2025).

¹⁵ Lisiecki & Appleby, *supra* note 4.

¹⁶ *Id.*

¹⁷ *The Contributions of Temporary Protected Status Holders to the U.S. Economy*, Am. Immigr. Council, at 5 (Sept. 2023), https://www.americanimmigrationcouncil.org/wp-content/uploads/2025/01/contributionstemporaryprotectedstatus_0923.pdf.

¹⁸ *Id.*

integration into American society, ending their lawful status would cause irreparable harm to amici and communities across the country.

II. TPS RECIPIENTS PLAY A VITAL ROLE IN BOTH THE NATIONAL AND LOCAL ECONOMIES

TPS recipients make critical contributions to amici's economies as workers, consumers, entrepreneurs, and taxpayers. Approximately 87% of TPS holders in the United States are in the workforce, a substantially higher rate than the U.S. workforce participation rate overall (about 62%).¹⁹ The rate is even higher for TPS holders living in California: 94.6% of TPS holders were employed in 2021.²⁰ Terminating TPS would thus reduce the number of able and willing workers ready to engage in the U.S. labor force.

Terminating TPS would also weaken amici's economies. A 2024 study indicates Venezuelan and Haitian TPS holders generate significant economic activity—totaling, respectively, \$11.5 billion and \$4.4 billion annually.²¹ Unsurprisingly, another study estimated that rising removals would decrease

¹⁹ Nicole Svajlenka, *What Do We Know About Immigrants With Temporary Protected Status?*, Ctr. For Am. Progress (Feb. 11, 2019), <https://www.americanprogress.org/article/know-immigrants-temporary-protected-status/>; *Temporary Protected Status Protects Families While Also Boosting the U.S. Economy* (Mar. 21, 2025), *supra* note 14.

²⁰ *The Contributions of Temporary Protected Status Holders to the U.S. Economy*, *supra* note 17, at 2.

²¹ *Temporary Protected Status Protects Families While Also Boosting the U.S. Economy*, FWD.us, at 2 (Feb. 2024), https://www.fwd.us/wp-content/uploads/2024/02/FWD_TPSIIIRreport.pdf.

economic growth and negatively impact the country's future Gross Domestic Product (GDP).²² A 2017 study estimated that the loss of Haitian TPS workers, among other TPS workers, would result in the loss of \$164 billion to the U.S. GDP over the next decade.²³ Certain industries and regions with higher concentrations of TPS workers would be hit particularly hard.²⁴ For example, data from 2017 shows that the loss of Haitian TPS workers in New York would result in a \$262.9 million reduction in New York's GDP annually, with the health care and social assistance industries most likely to be most affected.²⁵ Similarly, in Colorado, the absence of

²² Editorial Board, *The Economic Drain of Mass Deportation*, Wall Street Journal (July 9, 2025), <https://www.wsj.com/opinion/donald-trump-mass-deportations-workforce-immigrants-economic-growth-brooke-rollins-f1e1999d?msockid=12206f7a49fc6272073a79e7485163b7>.

²³ Nicole Svajlenka et. al., *TPS Holders Are Integral Members of the U.S. Economy and Society*, Ctr. for Am. Progress (Oct. 20, 2017), <https://www.americanprogress.org/article/tps-holders-are-integral-members-of-the-u-s-economy-and-society/>.

²⁴ See Alison Moodie, *TPS for Venezuelans Is Ending—What Employers Should Do Next*, Boundless (July 25, 2025), <https://www.boundless.com/blog/tps-venezuelans-end-impact-employers#industries-most-affected> (identifying hospitality and food service, construction, health care support, and janitorial and maintenance services as the industries most likely to be affected by TPS termination, including of Venezuelan TPS holders); Svajlenka et. al., *supra* note 23 (identifying Haitian TPS holders, among other TPS holders, as key contributors to the construction, restaurant, landscaping services, childcare, and grocery stores sectors).

²⁵ *TPS Holders in New York*, Ctr. for Am. Progress, https://www.americanprogress.org/wp-content/uploads/sites/2/2017/10/101717_TPSFactsheet-NY.pdf; see also *TPS Holders in California*, Ctr. for Am. Progress, https://www.americanprogress.org/wp-content/uploads/sites/2/2017/10/101717_TPSFactsheet-CA.pdf (last visited Nov. 4, 2025) (identifying state GDP loss associated with Haitian TPS workers in California); Svajlenka et al., *TPS Holders Are Integral Members of the U.S. Economy and Society*, *supra* note 23 (identifying state GDP loss associated with Haitian TPS workers in New York and California).

TPS workers would contribute to a loss of \$78.2 million in the state's GDP.²⁶ And ending TPS for Haitian workers in Massachusetts would result in a loss of \$203.8 million to the state's GDP.²⁷

TPS holders are also entrepreneurial, with higher rates of entrepreneurship than U.S.-born workers. One report found that 14.5% of employed TPS holders are self-employed, compared to only 9.3% of the U.S.-born population.²⁸ TPS entrepreneurs generated \$1.5 billion in business income in 2021, and those in California alone generated \$224.8 million.²⁹

Individuals with TPS are also significant contributors to tax revenues, including state and local taxes upon which amici rely. Nationwide, TPS holders accounted for a total of \$966.5 million in contributions to state and local taxes in 2021.³⁰ This amounts to a significant stream of funding for many localities. As just a few examples, that same year, TPS holders contributed \$170.5 million to state and local taxes in California, \$126 million in New York, and \$25.4 million in

²⁶ *TPS Holders in Colorado*, Ctr. for Am. Progress, https://www.americanprogress.org/wp-content/uploads/sites/2/2017/10/101717_TPSFactsheet-CO.pdf (last visited Nov. 4, 2025) (estimating 2017 data to estimate impact on GDP).

²⁷ *TPS Holders in Massachusetts*, Ctr. for Am. Progress, https://www.americanprogress.org/wp-content/uploads/sites/2/2017/10/101717_TPSFactsheet-MA.pdf (last visited Nov. 9, 2025).

²⁸ *The Contributions of Temporary Protected Status Holders to the U.S. Economy*, *supra* note 17, at 4.

²⁹ *Id.* at 4.

³⁰ *Id.* at 3.

Massachusetts.³¹ If TPS holders lose their protected status, amici will feel this loss in revenue, making it more difficult to provide investments and services that benefit all residents of amici's communities.

The same is true at a national level. TPS holders contribute significantly to federal taxes: In 2021, TPS holders residing in California contributed \$235.1 million in federal taxes, TPS holders residing in New York contributed \$142.3 million in federal taxes, and TPS holders living in Massachusetts contributed \$48 million in federal taxes.³² TPS holders also contribute to federal public assistance programs for which they are ineligible, such as the Supplemental Nutrition Assistance Program (SNAP) and regular coverage under Medicaid.³³

III. TERMINATING TPS WILL WEAKEN PUBLIC SAFETY BY ERODING COMMUNITY COOPERATION WITH LAW ENFORCEMENT

Terminating TPS would risk compromising the safety of amici's communities. Community policing strategies rely on trust and engagement between law enforcement and the people they protect.³⁴ With protection from deportation,

³¹ *Id.* at 6.

³² *Id.*

³³ Karen Aho, *Spotlight on the Economic Contributions of TPS Holders*, Am. Immigr. Council (Oct. 23, 2023), <https://www.americanimmigrationcouncil.org/blog/economic-contributions-tps-holders/>.

³⁴ See, e.g., *Community Policing Plan FY 2025*, Los Angeles Cnty. Sheriff's Dept., Transit Services Bureau (2025), <https://lasd.org/wp-content/uploads/2024/07/Community-Policing-Plan-FY2025.pdf>; Ricardo D. Martinez-Schuldt et al., *Immigrant Sanctuary Policies and Crime Reporting Behavior: A Multilevel Analysis of Reports of Crime Victimization to Law Enforcement, 1980 to 2004*, 86 Am.

TPS holders can freely report crime and collaborate with law enforcement on investigations and prosecutions without fear of retribution or immigration consequences. But as fear of deportation increases, trust in local law enforcement decreases.³⁵

Numerous studies show a direct link between immigration policy and community safety. It is well-documented that undocumented immigrants are less likely to report crimes, including violent crimes, when they fear police contact will bring adverse immigration consequences.³⁶ For example, a 2017 survey of Mexican nationals in San Diego revealed that over 60% of undocumented immigrants were less likely to report a crime they witnessed if local law enforcement officials were

Sociological Rev. 154, 155 (2021) (“Mutual trust and cooperation between residents and local institutions like law enforcement are integral to the safety and well-being of communities.”) (citations omitted).

³⁵ John Burnett, *New Immigration Crackdowns Creating ‘Chilling Effect’ on Crime Reporting*, NPR (May 25, 2017), <https://www.npr.org/2017/05/25/529513771/new-immigration-crackdowns-creating-chilling-effect-on-crime-reporting>; James Queally, *Fearing Deportation, Many Domestic Violence Victims Are Steering Clear of Police and Courts*, L.A. Times (Oct. 9, 2017), <https://tinyurl.com/Undocumented-Crime-Reporting>; ACLU, *Freezing Out Justice*, at 1 (2018), <https://assets.aclu.org/live/uploads/publications/rep18-icecourthouse-combined-rel01.pdf>.

³⁶ John Burnett, *New Immigration Crackdowns Creating ‘Chilling Effect’ on Crime Reporting*, NPR (May 25, 2017), <https://www.npr.org/2017/05/25/529513771/new-immigration-crackdowns-creating-chilling-effect-on-crime-reporting>; James Queally, *Fearing Deportation, Many Domestic Violence Victims Are Steering Clear of Police and Courts*, L.A. Times (Oct. 9, 2017), <https://tinyurl.com/Undocumented-Crime-Reporting>; ACLU, *Freezing Out Justice*, at 1 (2018), <https://assets.aclu.org/live/uploads/publications/rep18-icecourthouse-combined-rel01.pdf>.

“working together with ICE.”³⁷ That same year, the rate of reporting spousal abuse and rape in the Hispanic community in Los Angeles declined by 10% and 25%, respectively, and the Los Angeles Police Department attributed the decline to “deportation fears” in the Hispanic community.³⁸ Similarly, a 2010 study of Latinos living in counties encompassing four major cities—Los Angeles, Chicago, Houston, and Phoenix—found that 70% of undocumented immigrants were “less likely to contact law enforcement authorities if they were victims of crime,” and 67% were “less likely to voluntarily offer information about crimes [they] know have been committed” out of fear that they will be asked about their immigration status.³⁹ This demonstrated decline in crime reporting—driven by fear of deportation—affects public safety by not only depriving law enforcement of knowledge of a crime, but also impeding law enforcement’s ability to investigate and obtain evidence of crimes

³⁷ Tom K. Wong, *Sanctuary Cities Don’t ‘Breed Crime.’ They Encourage People to Report Crime*, Wash. Post (Apr. 24, 2018), <https://www.washingtonpost.com/news/monkey-cage/wp/2018/04/24/sanctuary-cities-dont-breed-crime-they-encourage-people-to-report-crime> (emphasis omitted).

³⁸ *Decline in Reporting of Crime Among Hispanic Population*, L.A. Police Dep’t (Mar. 21, 2017), <https://www.lapdonline.org/newsroom/decline-in-reporting-of-crime-among-hispanic-population-nr17083ma/>.

³⁹ Nik Theodore, *Insecure Communities: Latino Perceptions of Police Involvement in Immigration Enforcement*, Dep’t. of Urb. Plan. & Pol’y, Univ. of Ill. at Chi. 1, 5, 10 (May 2013), https://greatcities.uic.edu/wp-content/uploads/2014/05/Insecure_Communities_Report_FINAL.pdf; see also Stefano Comino et al., *Silence of the Innocents: Undocumented Immigrants’ Underreporting of Crime and Their Victimization*, 39 J. Pol’y Analysis & Mgmt. 1214 (2020), <https://doi.org/10.1002/pam.22221>.

and first-hand witness accounts.⁴⁰ Moreover, the same 2010 study also found that 47% of U.S.-born Latinos did not “feel safer knowing local law enforcement [was] involved in immigration enforcement”⁴¹—suggesting that an increase in immigration enforcement negatively affects both documented and undocumented persons’ perceptions of safety and their relationships with law enforcement.

This phenomenon is reflected in public statements from and actions taken by police in amici’s communities and beyond.⁴² Police departments across the country have been “holding town halls, releasing videos and statements, and adding FAQ sections to their website” to communicate that “[t]hey are not immigration officers and residents should not be afraid to call them.”⁴³ For example, reflecting on an uptick in immigration enforcement this year, the Minneapolis Police Chief stated, “If people are not willing to call us and tell us what is going on, tell us they’ve been victimized, cooperate as witnesses, all of that leads to a situation that makes the potential for everyone in this city to be victimized that much worse.”⁴⁴ Similarly, the Los Angeles County Sheriff, commenting on his fears that anticipated federal

⁴⁰ See, e.g., Tom K. Wong, *The Effects of Sanctuary Policies on Crime and the Economy*, Ctr. for Am. Progress (Jan. 26, 2017), <https://www.americanprogress.org/article/the-effects-of-sanctuary-policies-on-crime-and-the-economy/> (sanctuary counties have lower crime rates than comparable non-sanctuary counties).

⁴¹ Theodore, *supra* note 39, at 9.

⁴² Meg Anderson, *Police Say ICE Tactics Are Eroding Public Trust in Local Law Enforcement*, NPR (Mar. 30, 2025), <https://www.npr.org/2025/03/30/nx-s1-5304236/police-say-ice-tactics-are-eroding-public-trust-in-local-law-enforcement>.

⁴³ *Id.*

⁴⁴ *Id.*

immigration enforcement could erode public trust, stated, “There’s a lot of rhetoric, and I don’t want people to be afraid to call the sheriff’s department when they need something. . . . If they’re a witness to a crime, if they’re a victim to a crime, they need to call us.”⁴⁵

Conversely, when fears of immigration enforcement are not prevalent, trust between immigrants and law enforcement grows. For example, after the Los Angeles Police Department reiterated it would not question residents for the sole purpose of determining immigration status, the gap between the Hispanic community and citywide reporting of sexual assaults decreased to under 4%, and the gap for domestic violence reporting decreased to 0.4%.⁴⁶ Another report analyzing crime data from the Dallas Police Department during a time when ICE’s enforcement priorities were limited found a roughly 4% increase in police reports filed by Hispanic individuals.⁴⁷

⁴⁵ *Sheriff Luna on Trump’s Mass Deportation Plans: ‘We Will Not Start Asking About Immigration Status’*, KABC (Nov. 22, 2024), <https://www.msn.com/en-us/news/us/sheriff-luna-on-trumps-mass-deportation-plans-we-will-not-start-asking-about-immigration-status/ar-AA1uzwAz>.

⁴⁶ *Statement on Sexual Assault And Domestic Violence Reporting in Immigrant Communities*, L.A. Police Dep’t (Apr. 27, 2018), https://lapdblog.typepad.com/lapd_blog/2018/04/statement-on-sexual-assault-and-domestic-violence-reporting-in-immigrant-communities.html; *see also LAPD On Sexual Assault, Domestic Violence*, Canyon News (May 7, 2018), <https://www.canyon-news.com/lapd-on-sexual-assault-domestic-violence/>; Frank Stoltze, *LAPD Takes Some Credit for Easing Immigrants’ Fears of Reporting Crimes*, LAist (Apr. 24, 2018), <https://laist.com/news/kpcc-archive/lapd-reports-progress-in-easing-immigrants-fears-o>.

⁴⁷ Elisa Jácome, *The Effect of Immigration Enforcement on Crime Reporting: Evidence from the Priority Enforcement Program*, 128 J. Urb. Econ. 103395 (Mar. 2022),

Fear of deportation within immigrant communities harms both immigrants and the broader communities in which they live. In addition to resulting in unreported crimes, fear of deportation also weakens local economies. When undocumented immigrants fear police presence, they are less likely to venture into public places, they interact less with schools and other public institutions, they patronize businesses less frequently, and they even change their driving patterns.⁴⁸

Thus, ending TPS for Venezuela and Haiti not only threatens the well-being of hundreds of thousands of TPS beneficiaries and their families who reside in amici's communities, but also jeopardizes amici's community policing initiatives, causes long-term damage to local law enforcement efforts, and disrupts overall engagement in amici's communities.

<https://www.sciencedirect.com/science/article/abs/pii/S0094119021000772?via%3Dihub>; see also Martinez-Schuldt et al, *supra* note 34, at 155-56.

⁴⁸ See, e.g., Randy Capps et al., *Delegation and Divergence: A Study of 287(g) State and Local Immigration Enforcement*, Migration Policy Inst., at 43 (Jan. 2011), <https://www.migrationpolicy.org/research/delegation-and-divergence-287g-state-and-local-immigration-enforcement>; Miriam Jordan et al., *Immigrant Communities in Hiding: People Think ICE Is Everywhere*, N.Y. Times (Jan. 30, 2025), <https://www.nytimes.com/2025/01/30/us/immigrant-communities-hiding-ice.html> (documenting how fear of deportation has had a chilling effect on schools, churches, and shops in Los Angeles and other communities). *Contra Temporary Protected Status Protects Families While Also Boosting the U.S. Economy* (Mar. 21, 2025), *supra* note 14 (finding TPS “provides significant protections for families, allowing them to improve their economic condition, keep their families together, and more fully participate in their local communities”).

IV. TERMINATING TPS WILL RESULT IN FAMILY SEPARATION AND WREAK DEVASTATING CONSEQUENCES

Ending TPS for Venezuela and Haiti will have enduring adverse effects on families in amici's communities, including the many U.S.-citizen children whose TPS-holding parents would become at risk of detention or deportation. Mixed-status households are prevalent in the United States, including in amici's communities, where as many as 30% of Haitian immigrants and 10% of Venezuelan immigrants live.⁴⁹ According to data from 2023, more than 260,000 U.S.-citizen children live in households with a TPS recipient, and more than 320,000 U.S.-citizen adults live with a TPS recipient.⁵⁰ In 2022, there were approximately 141,000 U.S.-citizen children and 196,000 U.S.-citizen adults living with Venezuelan or Haitian TPS holders.⁵¹ These figures underestimate the number of U.S. citizens in mixed-status households with TPS recipients, as hundreds of thousands of Venezuelan and Haitian nationals became eligible and may have obtained TPS status under the 2023 and 2024 designations, after the data was collected.⁵² Ending TPS for Venezuela

⁴⁹ *U.S. Immigrant Population by Metropolitan Area, 2019-2023*, *supra* note 6.

⁵⁰ *Temporary Protected Status Protects Families While Also Boosting the U.S. Economy* (Mar. 21, 2025), *supra* note 14 (estimating figure based on status of TPS program as of March 2025).

⁵¹ *Temporary Protected Status Protects Families While Also Boosting the U.S. Economy* (Feb. 2024), *supra* note 11.

⁵² *See* 90 Fed. Reg. 9041 (Feb. 5, 2025), <https://www.federalregister.gov/documents/2025/02/05/2025-02294/termination-of-the-october-3-2023-designation-of-venezuela-for-temporary-protected-status> (estimating 348,202 Venezuelan nationals became eligible for TPS under the 2023 designation of Venezuela); 90 Fed. Reg. 10512 (Feb. 24, 2025),

and vacating Haiti's TPS extension would thus impact hundreds of thousands of U.S.-citizen family members, many of whom would be left behind as their loved ones and caregivers are forced to leave the United States.

The consequences would be particularly destructive for children of TPS holders. "Vast scientific evidence suggests separation from parents is among the most impactful traumatic experiences that a child can have."⁵³ The harm resulting from such separation is well-established. Children who have been separated from their parents face increased risks of a multitude of physical and mental health problems, including anxiety, depression, PTSD, lower IQ, obesity, impaired immune system function, stunted physical growth, cancer, heart and lung disease, and stroke.⁵⁴ They also struggle with emotional attachment and self-esteem and are more

<https://www.federalregister.gov/documents/2025/02/24/2025-02970/partial-vacatur-of-2024-temporary-protected-status-decision-for-haiti> (describing the 2024 extension of the TPS designation for Haiti as covering approximately 199,445 Haitian nationals and the new 2024 designation as covering 321,249 Haitian nationals). *See also* New York State Attorney General, *Attorney General James Defends Temporary Protected Status for Haitian and Venezuelan Immigrants* (Mar. 25, 2025), <https://ag.ny.gov/press-release/2025/attorney-general-james-defends-temporary-protected-status-haitian-and-venezuelan> ("[H]undreds of thousands of Haitian and Venezuelans [became] newly eligible under the 2023 and 2024 designations.").

⁵³ Cristina Muñiz de la Peña et al., *Working with Parents and Children Separated at the Border: Examining the Impact of the Zero Tolerance Policy And Beyond*, 12 J. of Child & Adolescent Trauma 153, 156 (2019),

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7163859>.

⁵⁴ Johayra Bouza et al., *The Science Is Clear: Separating Families Has Long-term Damaging Psychological & Health Consequences for Children, Families, and Communities*, Soc'y For Rsch. in Child Dev. (June 20, 2018), <https://www.srcd.org/briefs-fact-sheets/the-science-is-clear>.

likely to develop severe behavioral issues.⁵⁵ The negative impacts from the trauma of parental separation can be lifelong and may result in developmental difficulties and damage to parts of the brain responsible for learning and memory.⁵⁶

Even the threat of being separated from their parents has profound emotional harm on children. Children in mixed-status families often live with chronic anticipatory anxiety that their loved one could be detained or deported, and these fears have been shown to lead to “school absenteeism, academic disengagement, and heightened emotional distress.”⁵⁷ These consequences are deeply damaging to the wellbeing, development, and future opportunities of the affected children. And these consequences in turn directly harm amici, who depend on the children of their communities for their future prosperity and vibrancy.

V. ENDING TPS WILL WORSEN PUBLIC HEALTH AND INCREASE HEALTH CARE COSTS

Ending TPS for Venezuela and vacating Haiti’s TPS extension will negatively impact public health in amici’s communities by reducing these TPS recipients’ access to health care and disincentivizing them from seeking medical treatment.

⁵⁵ *Id.*; Charles Nelson, et al., *Adversity in Childhood Is Linked to Mental and Physical Health Throughout Life*, BMJ (Oct. 28, 2020), <https://www.bmj.com/content/371/bmj.m3048>.

⁵⁶ *Key Health Implications of Separation of Families at the Border*, KFF (June 27, 2018), <https://www.kff.org/racial-equity-and-health-policy/fact-sheet/key-health-implications-of-separation-of-families-at-the-border/#footnote-260162-13>.

⁵⁷ Lisa Fortuna, et al., *Special Report: U.S. Immigration Policy and the Mental Health of Children and Families*, Psychiatry Online (July 25, 2025), <https://psychiatryonline.org/doi/epub/10.1176/appi.pn.2025.08.8.19>.

Even individuals whose status is unaffected, such as U.S.-citizen children of TPS holders, will also be negatively impacted, as parents' and caregivers' fears of immigration consequences can result in delays in seeking treatment for their children.⁵⁸ Local governments like amici will shoulder much of the resulting financial cost.

At present, 71% of TPS-eligible Venezuelans and 64% of TPS-eligible Haitians have health insurance.⁵⁹ Many TPS holders will lose access to that insurance if their status is terminated. Those who obtain insurance through their employer will lose insurance upon losing work authorization, and TPS recipients stripped of legal status will no longer be eligible to purchase insurance through Affordable Care Act exchanges, either.⁶⁰ A rise in the rate of uninsurance means a greater share of the burden of paying for health care will be shifted to local governments and communities. Uninsured individuals are less likely to seek preventive care and obtain regular treatment for chronic illnesses, and as a result

⁵⁸ Grace Kim et al., *Should Immigration Status Information Be Included in a Patient's Health Record?*, AMA J. of Ethics (Jan. 2019), <https://journalofethics.ama-assn.org/article/should-immigration-status-information-be-included-patients-health-record/2019-01> ("Historically, increased immigration enforcement has had damaging effects on mental health, led to fatal delays in seeking treatment, and reduced already low rates of Medicaid participation for citizen children in mixed-status families, impairing continuity of care and the ability to manage chronic health conditions.").

⁵⁹ Lisiecki & Appleby, *supra* note 4.

⁶⁰ Abigail F. Kolker & Elayne J. Heisler, Cong. Rsch. Serv., R47351, *Noncitizens' Access to Health Care* 14-15, Tbl. 1, <https://www.congress.gov/crs-product/R47351> (eligibility for ACA Health Insurance Exchanges limited to immigrants who are "lawfully present," which includes TPS recipients and excludes "unauthorized immigrants").

they are more likely to seek emergency care and be hospitalized for avoidable health problems.⁶¹ When emergency care becomes necessary, uninsured individuals often rely on public hospitals and community health centers, which serve as a safety net.⁶² Much of the cost of that care goes uncompensated, and a significant portion of it is ultimately absorbed by state and local governments.⁶³

In addition, TPS holders who may not have previously had health insurance and who lose their legal status are also likely to avoid seeking preventive care due to increased fears of negative immigration consequences.⁶⁴ Studies show that undocumented immigrants are often reluctant to obtain medical treatment out of concern their information may be shared with government agencies and lead to arrest

⁶¹ Jennifer Tolbert et al., *Key Facts About the Uninsured Population*, KFF (Dec. 18, 2024), <https://www.kff.org/uninsured/issue-brief/key-facts-about-the-uninsured-population/>; Michael Hiltzik, *A Punitive Trump Proposal Stokes Panic Among Immigrants—Even Before It's Official*, L.A. Times (Aug. 24, 2018), <http://www.latimes.com/business/hiltzik/la-fi-hiltzik-public-charge-20180824-story.html>.

⁶² Tolbert, *supra* note 61.

⁶³ Teresa A. Coughlin et al., *Sources of Payment for Uncompensated Care for the Uninsured*, KFF (Apr. 6, 2021), <https://www.kff.org/uninsured/issue-brief/sources-of-payment-for-uncompensated-care-for-the-uninsured/> (estimating that state and local governments pay for around one-third of these uncompensated costs, amounting to a total of \$11.9 billion in 2021); Allen Dobson et al., *Comparing the Affordable Care Act's Financial Impact on Safety-Net Hospitals in States That Expanded Medicaid and Those That Did Not*, The Commonwealth Fund (Nov. 21, 2017), <https://www.commonwealthfund.org/publications/issue-briefs/2017/nov/comparing-affordable-care-acts-financial-impact-safety-net> (finding that safety-net hospitals in states that expanded Medicaid experienced reduced uncompensated care costs compared to states where Medicaid was not expanded).

⁶⁴ See Scott D. Rhodes et al., *The Impact of Local Immigration Enforcement Policies on the Health of Immigrant Hispanics/Latinos in the United States*, 105 Am. J. Pub. Health 329, 332 (2015).

or deportation.⁶⁵ In a Spring 2025 series of focus groups conducted with likely undocumented immigrants in California, Texas, New Jersey, New York, and parts of the Midwest, many participants reported avoiding seeking health care due to increased fears of immigration enforcement in light of recent changes in immigration policy.⁶⁶

Amici's communities have already felt the effects of rising concerns about negative immigration consequences. A major network of community health centers in Los Angeles reported in June 2025 that since federal immigration raids recently began sweeping the county, the network saw its appointment no-show rate jump from below 10% to over 30%.⁶⁷ Patient health has suffered as a consequence, as individuals avoid seeking preventive care and obtaining ongoing treatment needed to manage chronic conditions.⁶⁸

Fear of immigration enforcement also harms public health in amici's communities. Undocumented immigrants are less likely to be tested and treated for

⁶⁵ Roxanne P. Kerani & Helena A. Kwakwa, *Scaring Undocumented Immigrants Is Detrimental to Public Health*, 9 Am. J. Pub. Health 1165-1166 (Sept. 2018), <https://pmc.ncbi.nlm.nih.gov/articles/PMC6085039/>.

⁶⁶ Drishti Pillai et al., *Living in an Undocumented Immigrant Family Under the Second Trump Administration: Fear, Uncertainty, and Impacts on Health and Well-Being*, KFF (May 8, 2025), <https://www.kff.org/racial-equity-and-health-policy/issue-brief/living-in-an-undocumented-immigrant-family-under-the-second-trump-administration-fear-uncertainty-and-impacts-on-health-and-well-being/>.

⁶⁷ Shreyas Teegala, *Fearing Ice Raids, Some LA Residents Skip Doctor's Visits: 'Everybody's Life Is on Pause'*, The Guardian (Jun. 24, 2025), <https://www.theguardian.com/us-news/2025/jun/24/ice-raids-healthcare-los-angeles-ohio>.

⁶⁸ *Id.*

communicable diseases, which may result in further spread of illness.⁶⁹ Immigration-related fears also impede contact tracing efforts that rely on community members' open cooperation with public health workers.⁷⁰

Ending TPS for Venezuela and Haiti therefore risks worsening public health in amici's communities and increasing the health care costs some amici must incur as safety net providers.

CONCLUSION

For the reasons stated above, amici respectfully request the Court affirm the district court's grant of summary judgment.

⁶⁹ Kerani & Kwakwa, *supra* note 65.

⁷⁰ *Id.*

Dated: November 12, 2025

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CERTIFICATE OF COMPLIANCE

1. This brief complies with the type-volume limitations of Federal Rule of Appellate Procedure (“FRAP”) 32(a)(7)(B) because this brief contains 5,391 words, excluding the parts of the brief exempted by Fed. R. App. P. 32(f).

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Dated: November 12, 2025

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit by using the appellate CM/ECF system on November 12, 2025. All participants in this case are registered CM/ECF users, and will be served by the appellate CM/ECF System.

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