

LILIANA CAMPOS (S.B. # 255753)
Assistant County Counsel
lcampos@counsel.lacounty.gov
BRIGIT GREESON ALVAREZ (S.B. # 237301)
Deputy County Counsel
bgreesonalvarez@counsel.lacounty.gov
648 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012-2713
Telephone: (213) 808-8736
Fax: (213) 633-1915

Attorneys for Amicus Curiae County of Los Angeles

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, DENIS
MOLINA, JHONY SILVA, MARIA ELENA
HERNANDEZ, O.C., SANDHYA LAMA,
S.K., TEOFILO MARTINEZ,

Plaintiffs,

v.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-05687

**[PROPOSED] BRIEF OF AMICI
CURIAE 12 LOCAL GOVERNMENTS
IN SUPPORT OF PLAINTIFFS'
MOTION TO POSTPONE**

Judge: Hon. Trina L. Thompson
Date: July 29, 2025
Time: 2:00 p.m.
Place: Courtroom 9

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8 U.S.C. § 1254a(d)(4)	8
Other Authorities	
Abigail F. Kolker & Elayne J. Heisler, Cong. Rsch. Serv., R47351, Noncitizens’ Access to Health Care	18
ACLU, <i>Freezing Out Justice</i> (2018)	14
<i>Adversity in Childhood Is Linked to Mental and Physical Health Throughout Life</i> , BMJ (Oct. 28, 2020)	18
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)	19
Cecilia Menjívar, <i>Temporary Protected Status in the United States: The Experiences of Honduran and Salvadoran Immigrants</i> , National TPS Alliance 3 (May 2017)	12
<i>Community Policing Plan FY 2025</i> , Los Angeles Cnty. Sheriff’s Dept., Transit Services Bureau (2025)	14
Cornell Industrial Labor Relations, <i>TPS Oscar</i> , YouTube (Nov. 14, 2023)	12
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 (2019)	17
<i>Data Tables Offer Detailed Characteristics of Temporary Protected Status Recipients From El Salvador, Honduras, and Haiti by State</i> , Ctr. for Migration Studies (July 28, 2017)	11
<i>Decline in Reporting of Crime Among Hispanic Population</i> , L.A. Police Dep’t (Mar. 21, 2017)	15
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)	20
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1 Grace Kim et al., <i>Should Immigration Status Information Be Included in a</i>	
2 <i>Patient's Health Record?</i> , AMA J. of Ethics (Jan. 2019).....	18
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4 <i>Steering Clear of Police and Courts</i> , L.A. Times (Oct. 9, 2017)	14
5 Jennifer Tolbert et al., <i>Key Facts About the Uninsured Population</i> , KFF (Dec. 18,	
6 2024)	19
7 Johayra Bouza et al., <i>The Science Is Clear: Separating Families Has Long-term</i>	
8 <i>Damaging Psychological & Health Consequences for Children, Families, and</i>	
9 <i>Communities</i> , Soc'y For Research in Child Dev. (June 20, 2018)	18
10 John Burnett, <i>New Immigration Crackdowns Creating 'Chilling Effect' on Crime</i>	
11 <i>Reporting</i> , NPR (May 25, 2017)	14
12 Key Health Implications of Separation of Families at the Border, KFF (June 27,	
13 2018)	18
14 Matthew Chapman, <i>WSJ begs Trump to back off mass deportations: 'Economy</i>	
15 <i>needs them!'</i> , MSN (July 9, 2025)	13
16 Michael Hiltzik, <i>A punitive Trump proposal stokes panic among immigrants—even</i>	
17 <i>before it's official</i> , L.A. Times (Aug. 24, 2018)	19
18 Miriam Jordan et al., <i>Immigrant Communities in Hiding: People Think ICE Is</i>	
19 <i>Everywhere</i> , N.Y. Times (Jan. 30, 2025)	16
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21 <i>Reporting Crimes</i> , ACLU (May 3, 2018)	14
22 Nicole Svajlenka et al., <i>TPS Holders Are Integral Members of the U.S. Economy</i>	
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24 Nicole Svajlenka, <i>What Do We Know About Immigrants With Temporary</i>	
25 <i>Protected Status?</i> , Ctr. For Am. Progress (Feb. 11, 2019)	11, 12
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28 Chi.	15
Overcoming the Odds: <i>The Contributions of DACA-Eligible Immigrants and TPS</i>	
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Rafaela Rodrigues et al., <i>Promoting Access to Justice for Immigrant and Limited</i>	
<i>English Proficient Crime Victims in an Age of Increased Enforcement: Initial</i>	
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Randy Capps et al., <i>Delegation and Divergence: A Study of 287(g) State and Local Immigration Enforcement</i> , Migration Policy Inst. 43 (Jan. 2011)	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. 2021	14, 16
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 & Human Security 577 (2017)	10, 11
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)	19, 20
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, 332 (2015)	19
<i>Statement on Sexual Assault and Domestic Violence Reporting in Immigrant Communities</i> , L.A. Police Dep't (Apr. 27, 2018), http://www.lapdonline.org/newsroom/news_view/63831	16
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	15
<i>Temporary Protected Status (TPS): Fact Sheet</i> , National Immigration Forum (last updated June 10, 2025), https://immigrationforum.org/wp-content/uploads/2025/07/Temporary-Protected-Status-Fact-Sheet-July-10-2025.pdf	10
<i>Temporary Protected Status protects families while also boosting the U.S. economy</i> , FWD (Mar. 21, 2025), https://www.fwd.us/news/temporary-protected-status-report-2025/	11, 12, 17
<i>Temporary Protected Status: An Overview</i> , American Immigration Council (June 11, 2025), https://www.americanimmigrationcouncil.org/fact-sheet/temporary-protected-status-overview/	10
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/	19
<i>The Contributions of Temporary Protected Status Holders to the U.S. Economy</i> , Am. Immigration Council 5 (Sept. 2023), https://www.americanimmigrationcouncil.org/wp-content/uploads/2025/01/contributionstemporaryprotectedstatus_0923.pdf	11, 12, 13

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1	Tom K. Wong, <i>Sanctuary Cities Don't 'Breed Crime.'</i> <i>They Encourage People to</i>	
2	<i>Report Crime</i> , Wash. Post (Apr. 24, 2018),	
3	https://www.washingtonpost.com/news/monkey-	
4	cage/wp/2018/04/24/sanctuary-cities-dont-breed-crime-they-encourage-	
	people-to-report-crime/	15
5	Tom K. Wong, <i>The Effects of Sanctuary Policies on Crime and the Economy</i> , <i>Ctr.</i>	
6	<i>for Am. Progress</i> , Ctr. for Am. Progress (Jan. 26, 2017),	
7	https://www.americanprogress.org/article/the-effects-of-sanctuary-policies-on-	
8	crime-and-the-economy/	15
9	<i>TPS Holders in California</i> , Ctr. for Am. Progress,	
10	https://www.americanprogress.org/wp-	
11	content/uploads/sites/2/2017/10/101717_TPSFactsheet-CA.pdf	11, 13

INTEREST OF AMICI CURIAE¹

Amici curiae comprise 12 cities and counties.² They span every corner of the country, from urban metropolises and industrial centers to smaller communities and agricultural hubs, and 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 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 terminate TPS for Honduras, Nepal, and Nicaragua. Without relief from this Court, TPS is set to expire for Nepal on August 5, 2025, and for Honduras and Nicaragua on September 8, 2025. Defendants’ unlawful decision to revoke TPS for Honduras, Nepal, and Nicaragua not only threatens TPS recipients and their families but also will materially harm amici and their communities.

¹ All parties have consented to the filing of this amicus brief.

² Amici include the County of Boulder, Colorado; City of Chicago, Illinois; County of Los Angeles, California; City of Los Angeles, California; City of Minneapolis, Minnesota; City of Portland, Oregon; City of Providence, Rhode Island; City of San Diego, California; City and County of San Francisco, California; City of Santa Monica, California; City of Somerville, Massachusetts; and City of West Hollywood, California.

1 As our nation's history proves, the collective success of amici's communities depends on
2 the contributions of all residents—TPS holders included. The tens of thousands of TPS holders
3 from Honduras, Nepal, and Nicaragua who have built lives and families in amici's communities
4 will drive amici's future growth and prosperity. Amici therefore have a strong interest in
5 ensuring that Plaintiffs' motion to postpone is granted.

6 **ARGUMENT**

7 Terminating TPS for Honduras, Nepal, and Nicaragua would irreparably harm amici's
8 residents and communities. TPS holders from these countries are valued members of amici's
9 communities, and ending TPS would be devastating for the individual TPS recipients, their
10 families, and amici. TPS holders have formed deep roots in amici's communities. Many have
11 lived in the United States for decades. They are married to U.S. citizens and have U.S. citizen
12 children. They contribute to their local economies as consumers, taxpayers, and workforce
13 participants. And they contribute to the vibrancy of their communities as neighbors, volunteers,
14 and members of civic associations.

15 If TPS for these countries is terminated many recipients will be left with the terrible
16 choice of either remaining in the U.S. without any protected status, or returning to the disaster-
17 stricken countries from which they fled, often many years ago. Either option carries negative
18 consequences for amici and their communities. Former TPS holders who remain in the country
19 will lose the work authorization conferred by TPS and will no longer be able to contribute
20 economically to the same extent they did before. Their access to health insurance will be reduced
21 and they may avoid seeking preventive care out of fear their information will be shared with
22 immigration enforcement, thereby worsening public health outcomes and increasing the health
23 care costs borne by amici. They will also be more reluctant to cooperate with police for the same
24 reason, which will undermine public safety in amici's communities. Those individuals that make
25 the devastating choice to return to their home countries will leave behind family members,
26 including U.S. citizen children, who will suffer the destructive consequences of family separation.

1 They will also leave behind the local communities in which they played a vital role, rendering
2 amici worse off.

3 Terminating TPS for Honduras, Nicaragua, and Nepal would have a vast array of
4 profound negative consequences for amici and their residents. Amici respectfully urge the Court
5 to grant Plaintiffs' motion to postpone.

6 **I. TPS RECIPIENTS ARE DEEPLY INTEGRATED INTO AMICI'S** 7 **COMMUNITIES**

8 TPS holders are deeply integrated into their local communities, and their absence would
9 have wide-reaching consequences. Tens of thousands of individuals will be affected if TPS is
10 terminated for Honduras, Nepal, and Nicaragua. As of September 2024, there were
11 approximately 1.1 million TPS recipients living in the United States.³ Of those, 52,585 are from
12 Honduras, 7,505 are from Nepal, and 2,935 are from Nicaragua.⁴ Over 72,000 TPS holders reside
13 in California—12,000 of which are from Honduras alone.⁵ And as of September 2024, nearly
14 33,000 TPS holders reside in Illinois.⁶

15 Most TPS recipients are long-term residents of the United States, with the majority having
16 lived here for more than two decades.⁷ A significant proportion arrived in the United States at a
17 very young age.⁸ Honduran TPS recipients, for example, have lived in the United States for an

18 ³ American Immigration Council, *Temporary Protected Status: An Overview* (June 11, 2025),
19 <https://www.americanimmigrationcouncil.org/fact-sheet/temporary-protected-status-overview/>.

20 ⁴ *Temporary Protected Status (TPS): Fact Sheet*, National Immigration Forum (last updated June
21 10, 2025), [https://immigrationforum.org/wp-content/uploads/2025/07/Temporary-Protected-](https://immigrationforum.org/wp-content/uploads/2025/07/Temporary-Protected-Status-Fact-Sheet-July-10-2025.pdf)
22 [Status-Fact-Sheet-July-10-2025.pdf](https://immigrationforum.org/wp-content/uploads/2025/07/Temporary-Protected-Status-Fact-Sheet-July-10-2025.pdf).

23 ⁵ *Temporary Protected Status (TPS): Fact Sheet*, *supra* note 4; Lora Adams, *Pulling Back the*
24 *Curtain: Analysis of New Government Data on Temporary Protected Status* 20 (Mar. 2021),
25 https://nipnlg.org/sites/default/files/2023-03/2021_31Mar_pulling-back-curtain.pdf (identifying
26 data for Honduran TPS holders in California as of 2018).

27 ⁶ *Temporary Protected Status (TPS): Fact Sheet*, *supra* note 4.

28 ⁷ *Overcoming the Odds: The Contributions of DACA-Eligible Immigrants and TPS Holders to the*
U.S. Economy, New Am. Econ. Research Fund (June 3, 2019),
[https://www.americanimmigrationcouncil.org/report/overcoming-the-odds-the-contributions-of-](https://www.americanimmigrationcouncil.org/report/overcoming-the-odds-the-contributions-of-daca-eligible-immigrants-and-tps-holders-to-the-u-s-economy/)
daca-eligible-immigrants-and-tps-holders-to-the-u-s-economy/.

⁸ 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 & Human
Security 577, 581 (2017), <https://journals.sagepub.com/doi/pdf/10.1177/233150241700500302>.

average of 23 years.⁹ Around 30% arrived in the country when they were under the age of 18.¹⁰ As of 2017, more than one-half of Honduran TPS holders had resided in the United States for 20 years or more—with Honduran TPS holders in California residing in the state for an average of 23 years.¹¹

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 TPS holder parents in the United States.¹² As of 2017, 4,400 U.S.-born children in California alone have Honduran parents who are TPS holders.¹³ As of the same year, it was estimated that between 5-10% of TPS holders were married to U.S. citizens or lawful permanent residents.¹⁴

In addition to these family ties, TPS holders are strongly integrated into their communities in other ways. Data show that as of 2021, more than 41% of U.S. households with TPS recipients had purchased their homes.¹⁵ So in total, 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.¹⁶

TPS holders are also committed participants in their communities. In a 2017 survey of TPS recipients from El Salvador, Honduras, and Nicaragua, 29.7% of respondents reported that

⁹ 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/>.

¹⁰ *Id.*

¹¹ *Data Tables Offer Detailed Characteristics of Temporary Protected Status Recipients From El Salvador, Honduras, and Haiti by State*, Ctr. for Migration Studies (July 28, 2017), <https://cmsny.org/tpstablebystate/>.

¹² *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).

¹³ *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 July 24, 2025).

¹⁴ Warren & Kerwin, *supra* note 8.

¹⁵ *The Contributions of Temporary Protected Status Holders to the U.S. Economy*, Am. Immigration Council 5 (Sept. 2023), https://www.americanimmigrationcouncil.org/wp-content/uploads/2025/01/contributionstemporaryprotectedstatus_0923.pdf.

¹⁶ *Id.*

they had volunteered in civic organizations, committees, or community groups in the twelve months prior to the survey.¹⁷ Data from the same survey also showed that around 30% of TPS holders are actively involved in their communities, through neighborhood organizations, their children’s schools, church, work organizations or events, sports teams, and other activities.¹⁸

Deeply embedded in their communities, many TPS holders see the United States as home. Oscar, a 49-year-old TPS recipient living in New York, is one example. Oscar came to the United States from Honduras when he was 14, spent more time living and working here than in Honduras, and got married and had children here. He reports: “I love Honduras, the place where I was born. But I feel American, I just don’t have a paper that says I am American.”¹⁹ Given the large number of TPS holders and their deep 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 participate in the labor force, a substantially higher rate than the U.S. labor force participation rate overall (about 62%).²⁰ The rate is even higher for TPS holders living in California: 94.6% of TPS holders in California were employed in 2021.²¹ Terminating TPS would thus reduce the number of able and willing workers ready to engage in the U.S. labor force.

Terminating TPS would weaken amici’s economies. One study estimated that rising removals would decrease economic growth and negatively impact the United States’ future Gross

¹⁷ Cecilia Menjívar, *Temporary Protected Status in the United States: The Experiences of Honduran and Salvadoran Immigrants*, National TPS Alliance 3 (May 2017), https://nationaltpsalliance.org/wp-content/uploads/2018/08/TPS_Report_FINAL_v5.pdf.

¹⁸ *Id.*

¹⁹ Cornell Industrial Labor Relations, *TPS Oscar*, YouTube (Nov. 14, 2023), <https://www.youtube.com/watch?v=Zxosmn3NUo8>.

²⁰ Svajlenka, *supra* note 9; *Temporary Protected Status protects families while also boosting the U.S. economy*, *supra* note 12.

²¹ *The Contributions of Temporary Protected Status Holders to the U.S. Economy*, *supra* note 15.

Domestic Product (GDP).²² Certain industries and regions with higher concentrations of TPS workers would be hit particularly hard; for example, data from 2017 shows that the loss of Honduran TPS workers in California and New York, respectively, would result in a \$307.3 million and \$270.3 million reduction in each state's GDP annually, with the construction and manufacturing industries likely to be most affected.²³ Similarly, in Illinois, the loss of Honduran TPS workers (along with other non-Honduran TPS workers) would contribute to a loss of \$95.1 million in the state's GDP.²⁴

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 reported being self-employed, compared to only 9.3% of the U.S.-born population.²⁵ In total, TPS entrepreneurs generated \$1.5 billion in business income in 2021, and those in California alone generated \$224.8 million.²⁶

Individuals with TPS are also significant contributors to tax revenues, including state and local taxes, which amici rely upon. Nationwide, TPS holders accounted for a total of \$966.5 million in contributions to state and local taxes in 2021.²⁷ This amounts to a significant stream of funding for many localities. As just a few examples, TPS holders contributed \$170.5 million to state and local taxes in California, \$126 million in New York, and \$13.8 million in Illinois.²⁸ If TPS holders lose their protected status, amici will feel this loss in revenue, making it more

²² Matthew Chapman, *WSJ begs Trump to back off mass deportations: 'Economy needs them!'*, MSN (July 9, 2025), <https://www.msn.com/en-us/news/politics/wsj-begs-trump-to-back-off-mass-deportations-economy-needs-them/ar-AA1iVbL>.

²³ *TPS Holders in California*, *supra* note 13 (identifying state GDP loss associated with Honduran TPS workers in California); 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/> (identifying state GDP loss associated with Honduran TPS workers in New York, Illinois, and California).

²⁴ Svajlenka, *supra* note 23.

²⁵ *The Contributions of Temporary Protected Status Holders to the U.S. Economy*, *supra* note 15, at 4.

²⁶ *Id.*

²⁷ *Id.* at 3.

²⁸ *Id.* at 6.

difficult to provide investments and services that benefit all residents of amici's communities.

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

Terminating TPS compromises the safety of amici's communities. Community policing strategies rely on trust and engagement between law enforcement and the people they protect.²⁹ With TPS, recipients are protected from deportation, and 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.³⁰

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.³¹ 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

²⁹ 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. Sociological Rev. 2021, 154, 155 ("Mutual trust and cooperation between residents and local institutions like law enforcement are integral to the safety and well-being of communities").

³⁰ 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>.

³¹ ACLU, *supra* note 30, at 1; *New ACLU Report Shows Fear of Deportation Is Deterring Immigrants from Reporting Crimes*, ACLU (May 3, 2018), <https://www.aclu.org/press-releases/new-aclu-report-shows-fear-deportation-deterring-immigrants-reporting-crimes>; Rafaela Rodrigues et al., *Promoting Access to Justice for Immigrant and Limited English Proficient Crime Victims in an Age of Increased Enforcement: Initial Report from a 2017 National Survey* 39-43 (May 3, 2018), <https://niwaplibrary.wcl.american.edu/wp-content/uploads/Immigrant-Access-to-Justice-National-Report.pdf>.

1 enforcement officials are “working together with ICE.”³² Similarly, in 2017, the rate of reporting
 2 spousal abuse and rape in the Hispanic community in Los Angeles declined by 10% and 25%,
 3 respectively, and the Los Angeles Police Department attributed the decline to “deportation fears”
 4 in the Hispanic community.³³ A 2010 study of Latinos living in counties encompassing four
 5 major cities—Los Angeles, Chicago, Houston, and Phoenix—found that 70% of undocumented
 6 immigrants were “less likely to contact law enforcement authorities if they were victims of
 7 crime,” and 67% were “less likely to voluntarily offer information about crimes [they] know have
 8 been committed” out of fear that they will be asked about their immigration status.³⁴ This
 9 demonstrated decline in crime reporting—driven by fear of deportation—affects public safety by
 10 not only depriving law enforcement of knowledge of a crime, but also impeding their ability to
 11 investigate and obtain evidence of crimes and first-hand witness accounts.³⁵ The same study also
 12 found that 47% of U.S.-born Latinos did not “feel safer knowing local law enforcement [was]
 13 involved in immigration enforcement”³⁶—suggesting that both documented and undocumented
 14 persons’ perceptions of safety and their relationship with law enforcement is negatively impacted
 15 by increased immigration enforcement.

16
 17 ³² Tom K. Wong, *Sanctuary Cities Don’t ‘Breed Crime.’ They Encourage People to Report*
 18 *Crime*, Wash. Post (Apr. 24, 2018), [https://www.washingtonpost.com/news/monkey-](https://www.washingtonpost.com/news/monkey-cage/wp/2018/04/24/sanctuary-cities-dont-breed-crime-they-encourage-people-to-report-crime/)
 19 [cage/wp/2018/04/24/sanctuary-cities-dont-breed-crime-they-encourage-people-to-report-crime/](https://www.washingtonpost.com/news/monkey-cage/wp/2018/04/24/sanctuary-cities-dont-breed-crime-they-encourage-people-to-report-crime/)
 20 (emphasis omitted).

21 ³³ *Decline in Reporting of Crime Among Hispanic Population*, L.A. Police Dep’t (Mar. 21, 2017),
 22 [https://www.lapdonline.org/newsroom/decline-in-reporting-of-crime-among-hispanic-population-](https://www.lapdonline.org/newsroom/decline-in-reporting-of-crime-among-hispanic-population-nr17083ma/)
 23 [nr17083ma/](https://www.lapdonline.org/newsroom/decline-in-reporting-of-crime-among-hispanic-population-nr17083ma/).

24 ³⁴ Nik Theodore, *Insecure Communities: Latino Perceptions of Police Involvement in*
 25 *Immigration Enforcement*, Dep’t. of Urban Planning & Pol’y, Univ. of Ill. At Chi. 1, 5, 10 (May
 26 2013), [https://www.policylink.org/sites/default/files/INSECURE_COMMUNITIES_REPORT_FI](https://www.policylink.org/sites/default/files/INSECURE_COMMUNITIES_REPORT_FINAL.PDF)
 27 [NAL.PDF](https://www.policylink.org/sites/default/files/INSECURE_COMMUNITIES_REPORT_FINAL.PDF); see also Stefano Comino et al., *Silence of the Innocents: Undocumented Immigrants’*
 28 *Underreporting of Crime and Their Victimization*, 39 J. Pol’y Analysis & Mgmt. 1214 (2020),
<https://doi.org/10.1002/pam.22221>.

³⁵ See, e.g., Tom K. Wong, *The Effects of Sanctuary Policies on Crime and the Economy*, Ctr. for
 Am. Progress, Ctr. for Am. Progress (Jan. 26, 2017),
[https://www.americanprogress.org/article/the-effects-of-sanctuary-policies-on-crime-and-the-](https://www.americanprogress.org/article/the-effects-of-sanctuary-policies-on-crime-and-the-economy/)
[economy/](https://www.americanprogress.org/article/the-effects-of-sanctuary-policies-on-crime-and-the-economy/) (sanctuary counties have lower crime rates than comparable nonsanctuary
 counties).

³⁶ Theodore, *supra* note 34, at 9.

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%.³⁷ 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.³⁸

Fear of deportation within immigrant communities harms both immigrants and the broader communities in which they live. Not only does fear of deportation result in unreported crimes, but it 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.³⁹

Thus, terminating TPS not only threatens the well-being of hundreds of thousands of Honduran, Nepalese, and Nicaraguan TPS beneficiaries and their families who reside in amici's

³⁷ *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.

³⁸ Elisa Jácome, *The Effect of Immigration Enforcement on Crime Reporting: Evidence from the Priority Enforcement Program*, 128 J. Urban Econ. 103395 (Mar. 2022), <https://www.sciencedirect.com/science/article/abs/pii/S0094119021000772?via%3Dihub>; see also Ricardo D. Martinez-Schuldt et al., *supra* note 29, at 155-56.

³⁹ See, e.g., Randy Capps et al., *Delegation and Divergence: A Study of 287(g) State and Local Immigration Enforcement*, Migration Policy Inst. 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 supra* note 12 (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”).

communities⁴⁰—it also creates a public safety threat that jeopardizes amici’s community policing initiatives and causes long-term damage to local law enforcement efforts.

IV. TERMINATING TPS WILL RESULT IN FAMILY SEPARATION, WITH DEVASTATING CONSEQUENCES

Ending TPS will have devastating consequences for families in amici’s communities, including for the many U.S. citizen children whose parents would become at risk of detention or deportation. According to data from 2023, more than 260,000 U.S. citizen children live in households with TPS recipients, and more than 320,000 U.S. citizen adults live with TPS recipients.⁴¹ There are 54,000 U.S. citizens (including both children and adults) living with Honduran TPS holders; 6,000 U.S. citizens living with Nepalese TPS holders; and 4,000 U.S. citizens living with Nicaraguan TPS holders. Ending TPS for recipients from those countries would impact tens 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.”⁴² 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.⁴³ They also struggle with emotional attachment and self-esteem, and are more likely to

⁴⁰ *Temporary Protected Status protects families while also boosting the U.S. economy*, FWD.us (Feb. 2024), https://www.fwd.us/wp-content/uploads/2024/02/FWD_TPSIIIReport.pdf. (identifying collectively over 1 million Honduran, Nepalese, and Nicaraguan TPS holders residing in the United States).

⁴¹ *Temporary Protected Status protects families while also boosting the U.S. economy*, *supra* note 12 (estimated figure based on status of TPS program as of March 2025).

⁴² 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/>.

⁴³ 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

develop severe behavioral issues.⁴⁴ 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.⁴⁵ The consequences of family separation are thus deeply damaging to the wellbeing, development, and opportunities of the affected children. This in turn directly harms amici, who depend on the children of their communities for their future prosperity.

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

Terminating TPS will negatively impact public health in amici's communities by reducing TPS recipients' access to health care and disincentivizing them from seeking medical treatment. Even individuals whose status is unaffected, such as U.S. citizen children of TPS holders, will also be negatively impacted.⁴⁶ Local governments like amici will shoulder much of the resulting financial cost.

Many TPS holders will lose access to health insurance if their status is terminated. Those who obtain insurance through their employer will lose that 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.⁴⁷ A rise in the rate of uninsurance

Research in Child Dev. (June 20, 2018), <https://www.srkd.org/briefs-fact-sheets/the-science-is-clear>.

⁴⁴ *Id.*; *Adversity in Childhood Is Linked to Mental and Physical Health Throughout Life*, BMJ (Oct. 28, 2020), <https://www.bmj.com/content/371/bmj.m3048>.

⁴⁵ *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>.

⁴⁶ 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.").

⁴⁷ 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.")

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 they are more likely to seek emergency care and be hospitalized for avoidable health problems.⁴⁸ When emergency care does become necessary, uninsured individuals often rely on public hospitals and community health centers, which serve as a safety net.⁴⁹ Much of the cost of that care goes uncompensated, and a significant portion of it is ultimately absorbed by state and local governments.⁵⁰

In addition, TPS holders who lose legal status are also likely to avoid seeking preventive care due to fears of negative immigration consequences.⁵¹ 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 or deportation.⁵² In a spring 2025 series of focus groups conducted with likely undocumented immigrants, many participants reported avoiding seeking health care due to increased fears of immigration enforcement action in light of

⁴⁸ 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>.

⁴⁹ Tolbert, *supra* note 48.

⁵⁰ 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).

⁵¹ 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).

⁵² 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/>.

1 recent developments in immigration policy.⁵³ These fears are harmful to public health in amici's
 2 communities, as they make undocumented immigrants less likely to be tested and treated for
 3 communicable diseases, which may result in further spread of illness.⁵⁴ Immigration-related fears
 4 also impede contact tracing efforts, which require cooperation with public health workers by
 5 those exposed to contagious illnesses.⁵⁵

6 For these reasons, ending TPS will worsen public health in amici's communities and
 7 increase the health care costs they must incur.

8 CONCLUSION

9 For the reasons stated above, amici respectfully request that the Court grant Plaintiffs'
 10 motion to postpone.

11
 12 Dated: July 25, 2025

COUNTY OF LOS ANGELES

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 14 By: /s/ Liliana Campos

LILIANA CAMPOS

15 Attorneys for Amici Curiae County of Los
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 23 ⁵³ Drishti Pillai et al., *Living in an Undocumented Immigrant Family Under the Second Trump*
 24 *Administration: Fear, Uncertainty, and Impacts on Health and Well-Being*, KFF (May 8, 2025),
 25 [https://www.kff.org/racial-equity-and-health-policy/issue-brief/living-in-an-undocumented-](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/)
 26 [immigrant-family-under-the-second-trump-administration-fear-uncertainty-and-impacts-on-](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/)
 27 [health-and-well-being/](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/).

28 ⁵⁴ Kerani & Kwakwa, *supra* note 52.

⁵⁵ *Id.*

APPENDIX A
LIST OF COUNSEL FOR ADDITIONAL
PROPOSED AMICI CURIAE

BEN PEARLMAN
County Attorney
1325 Pearl St., 5th Floor
Boulder, CO 80302
Attorney for Boulder County, CO

JEFFREY DANA
City Solicitor
444 Westminster St., Ste. 220
Providence, RI 02903
Attorney for City of Providence, RI

MARY B. RICHARDSON-LOWRY
Corporation Counsel
City of Chicago Department of Law
121 North LaSalle Street, Suite 600
Chicago, Illinois 60602
Attorney for the City of Chicago, IL

HEATHER FERBERT
City Attorney
1200 Third Ave., Suite 1620
San Diego, CA 92101
Attorney for City of San Diego, CA

HYDEE FELDSTEIN SOTO
City Attorney
200 North Main Street
City Hall East, Suite 800
Los Angeles, California 90012
Attorney for the City of Los Angeles, CA

DAVID CHIU
City Attorney
City Hall Room 234
One Dr. Carlton B. Goodlett Pl.
San Francisco, CA 94102
Attorney for the City and County of San Francisco, CA

KRISTYN ANDERSON
City Attorney
350 S. Fifth Street
Minneapolis, MN 55415
Attorney for the City of Minneapolis, MN

DOUGLAS SLOAN
City Attorney
1685 Main Street, 3rd Floor
Santa Monica, CA 90401
Attorney for the City of Santa Monica, CA

MURIEL GOODE-TRUFANT
Corporation Counsel
of the City of New York
100 Church Street
New York, New York 10007
Counsel for the City of New York, NY

FRANCIS X. WRIGHT, JR.
City Solicitor, City of Somerville
93 Highland Avenue
Somerville, Massachusetts 02143
Attorney for the City of Somerville, MA

ROBERT TAYLOR
Portland City Attorney
1221 SW Fourth Ave, Room 430
Portland, OR 97204
Attorney for City of Portland, OR

LAUREN LANGER
City Attorney
Best Best & Krieger LLP
300 South Grand Avenue, 25th Floor
Los Angeles, CA 90071
Attorney for the City of West Hollywood, CA