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17 UNITED FARM WORKERS;
COALITION FOR HUMANE
18 IMMIGRANT RIGHTS; IMMIGRANT
DEFENDERS LAW CENTER,

19 Plaintiffs,

20 v.

21 KRISTI NOEM, in her official capacity
22 as Secretary of the Department of
Homeland Security; Todd M. LYONS,
23 in his official capacity as Acting
Director, U.S. Immigrations and
24 Customs Enforcement; Rodney S.
SCOTT, in his official capacity as
25 Commissioner, U.S. Customs and
Border Patrol; Michael W. BANKS, in
26 his official capacity as Chief of U.S.
Border Patrol; Kash PATEL, in his
27 official capacity as Director, Federal
Bureau of Investigation; Pam BONDI,
28 in her official capacity as U.S. Attorney

Case No.: 2:25-cv-05605-MEMF-SP

**[PROPOSED] BRIEF OF AMICI
CURIAE STATES OF
CALIFORNIA, ARIZONA,
COLORADO, CONNECTICUT,
HAWAII, ILLINOIS,
MASSACHUSETTS, MARYLAND,
MAINE, MICHIGAN,
MINNESOTA, NEVADA, NEW
JERSEY, NEW MEXICO, NEW
YORK, OREGON, VERMONT,
AND WASHINGTON IN SUPPORT
OF STOP/ARREST PLAINTIFFS'
APPLICATION FOR
TEMPORARY RESTRAINING
ORDER [ECF 45]**

Judge: Maame Ewusi-Mensah
Frimpong

1 General; Ernesto SANTACRUZ JR., in
2 his official capacity as Acting Field
3 Office Director for Los Angeles, U.S.
4 Immigration and Customs Enforcement;
5 Eddy WANG, Special Agent in Charge
6 for Los Angeles, Homeland Security
7 Investigations, U.S. Immigration and
8 Customs Enforcement; Gregory K.
9 BOVINO, in his official capacity as
10 Chief Patrol Agent for El Centro Sector
11 of the U.S. Border Patrol; Jeffrey D.
12 STALNAKER, in his official capacity
13 as Acting Chief Patrol Agent, San Diego
14 Sector of the U.S. Border Patrol; Akil
15 DAVIS, in his official capacity as
16 Assistant Director in Charge, Los
17 Angeles Office, Federal Bureau of
18 Investigation; Bilal A. ESSAYLI, in his
19 official capacity as U.S. Attorney for the
20 Central District of California,

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22 Defendants.
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INTRODUCTION

The residents of Los Angeles, like those throughout California and the country, seek to live peacefully in their communities. They go to work, bring their children to school, frequent local businesses and restaurants, attend worship services, and spend leisure time at parks, theatres, and festivals. But the ongoing mass deportation raids in Los Angeles have shattered these rhythms of everyday life. Masked immigration agents conducting unannounced enforcement actions through the community and, in all too many instances, stopping residents without so much as a reasonable suspicion of unlawful conduct have left people afraid to leave their homes. Restaurants have closed, local businesses have suffered, and families have skipped graduation ceremonies. Residents are hesitant to seek healthcare, and many churches are nearly empty. The cumulative effect of defendants' unlawful actions—including unconstitutional stops—has had devastating impacts on California's peace and prosperity, and has turned once-bustling neighborhoods into ghost towns.¹

The secretive approach taken by immigration agents as they conduct unlawful suspicionless stops has not only created a culture of fear, but has also needlessly impeded local law enforcement. Because their vehicles and uniforms are not clearly marked—and their tactics can be highly aggressive—the public cannot easily discern who is a federal law enforcement agent and who may be a criminal. Indeed, copycat crimes in which masked perpetrators imitate ICE agents are on the rise. Equally concerning, defendants' conduct has undermined the trust, built over years, between local law enforcement and the immigrant community. The confusion and

¹ Emily Witt, *The People Being Disappeared by ICE in Los Angeles*, The New Yorker (June 22, 2025), <https://www.newyorker.com/news/letter-from-los-angeles/the-people-being-disappeared-by-ice-in-los-angeles>; Tim Reid & Kristina Cooke, *Immigration raids in Los Angeles hit small business owners: 'It's worse than COVID'*, Reuters (June 17, 2025), <https://www.reuters.com/world/us/immigration-raids-los-angeles-hit-small-business-owners-its-worse-than-covid-2025-06-17/>.

1 distrust sown by defendants' unlawful law enforcement practices has thus
2 compromised public safety.

3 In light of these serious negative impacts, the temporary restraining order
4 sought by the plaintiffs is in the public interest and should be granted.

5 **BACKGROUND & INTEREST OF AMICUS CURIAE**

6 The Amici States² have a profound interest in safeguarding the rights and
7 well-being of all of their residents, regardless of where they were born. Immigrants
8 are an integral part of Amici States' social fabric. California alone is the proud
9 home of 10.6 million immigrants, and the Amici States together are home to over
10 26 million immigrants.³ Almost half of all California children have at least one
11 immigrant parent.⁴ Immigrants in California, with and without legal status, are
12 "students, teachers, artists, chefs, business owners, religious leaders, colleagues,
13 neighbors, family members, and more."⁵ Immigrants also stimulate the economy as
14 entrepreneurs, STEM workers, taxpayers, and consumers.⁶

15 Accordingly, in carrying out suspicionless stops, defendants are targeting
16 California's diverse communities and chilling civic and economic participation.
17 And this is only made worse by the aggressive and secretive tactics defendants
18 appear to be employing in doing so, which make Los Angeles less safe and
19 undermine local law enforcement. Although these tactics are currently focused on

20 ² The Amici States include: California, Arizona, Colorado, Connecticut,
21 Hawai'i, Illinois, Maryland, Maine, Michigan, Minnesota, Nevada, New Jersey,
22 New Mexico, New York, Oregon, Vermont, Washington, and the Commonwealth
of Massachusetts.

23 ³ Marisol Cuellar Mejia et al., *Immigrants in California*, Public Policy
Institute of California (Jan. 2025), [https://www.ppic.org/publication/immigrants-in-](https://www.ppic.org/publication/immigrants-in-california/)
24 [california/](https://www.ppic.org/publication/immigrants-in-california/); United States Census Bureau, *U.S. Foreign-Born Population* (April 9,
2024), [https://www.census.gov/library/visualizations/interactive/foreign-born-](https://www.census.gov/library/visualizations/interactive/foreign-born-population-2018-2022.html)
25 [population-2018-2022.html](https://www.census.gov/library/visualizations/interactive/foreign-born-population-2018-2022.html).

26 ⁴ Cuellar Mejia, *supra* note 3.

27 ⁵ See Kayla Kitson, *California's Undocumented Residents Make Significant*
Tax Contributions, California Budget & Policy Center (Oct. 2024),
[https://calbudgetcenter.org/resources/californias-undocumented-residents-make-](https://calbudgetcenter.org/resources/californias-undocumented-residents-make-significant-tax-contributions/)
28 [significant-tax-contributions/](https://calbudgetcenter.org/resources/californias-undocumented-residents-make-significant-tax-contributions/).

⁶ See State of California, *Immigration and California families*,
<https://www.ca.gov/immigration/>.

1 Los Angeles, defendants have conducted operations in other cities and counties in
2 California and throughout the country, including in the Amici States. Thus,
3 California and the Amici States have a significant interest in this Court enjoining
4 defendants from conducting stops that violate the Fourth Amendment.

5 California and the Amici States also have a significant interest in ensuring
6 federal law enforcement agencies abide by the Fourth Amendment and other federal
7 law while carrying out immigration enforcement, particularly in light of the Trump
8 Administration's stated priorities. In the midst of the broad enforcement actions in
9 Los Angeles, President Trump declared on Truth Social: "we must expand efforts to
10 detain and deport Illegal Aliens in America's largest Cities, such as Los Angeles,
11 Chicago, and New York, where Millions upon Millions of Illegal Aliens reside.
12 These, and other such Cities, are the core of the Democrat Power Center"⁷
13 Department of Homeland Security Secretary Kristi Noem shared a similar
14 sentiment in a press conference when she said that the federal government plans to
15 stay in Los Angeles to "liberate" the city from its elected officials.⁸ From these
16 statements, it is apparent that California, and likely other Amici States, will remain
17 a focal point for immigration raids in the future.

18 This is not the first time that California has been at the center of mass
19 deportation efforts, and unfortunately the State has felt the impacts of these
20 campaigns before. In 1954, California was one of the first two states targeted under
21 "Operation Wetback," a mass deportation campaign that took its name from an
22 ethnic slur.⁹ An earlier iteration of the campaign, in the 1930s, also targeted Los
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24 _____
25 ⁷ Donald J. Trump, Truth Social (Jun. 15, 2025),

<https://truthsocial.com/@realDonaldTrump/posts/114690267066155731>.

26 ⁸ Newsmax, *Kristi Noem: We are staying in LA to liberate this city*, YouTube
(June 12, 2025), <https://www.youtube.com/watch?v=QSnrzrqEOk8> (at 4:16).

27 ⁹ U.S. House of Representatives, *Depression, War, and Civil Rights*,
28 Historical Essays, <https://history.house.gov/Exhibitions-and-Publications/HAIC/Historical-Essays/Separate-Interests/Depression-War-Civil-Rights/>.

1 Angeles.¹⁰ The “La Placita sweep” was the first public immigration raid in Los
2 Angeles, and one of the largest such raids that roiled the country during the Great
3 Depression.¹¹ During this time, Mexican farm workers were indiscriminately
4 blamed for job shortages and shrinking public benefits.¹² The Depression-era
5 campaign resulted in the deportation of nearly two million Mexican Americans,
6 more than half of whom were U.S. citizens, without due process.¹³ Families were
7 separated, and many children never again saw their parents.¹⁴ Historians and
8 scholars have widely condemned these discriminatory raids as inhumane terror
9 campaigns.¹⁵

10 Yet prior to his election, then-candidate Donald Trump promised an
11 aggressive and militaristic mass deportation program that would be “the largest
12 deportation program ... in the history of America.”¹⁶ He has praised Operation
13 Wetback as an enforcement model.¹⁷ He also hailed the Eisenhower administration
14 for setting the record for deportations—a record he said his administration would
15

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17 ¹⁰ Gustavo Arellano, *Trump's immigration hammer bonks L.A. When will it*
18 *smash down?*, L. A. Times (June 9, 2025),
<https://www.latimes.com/california/newsletter/2025-06-09/1931-la-placita-olvera-raid>.

19 ¹¹ Claire Wang, *Millions of Mexican Americans were deported in the 1930s.*
20 *Are we about to repeat this ‘ethnic cleansing’?*, The Guardian (Dec. 3, 2024),
21 <https://www.theguardian.com/us-news/2024/dec/03/trump-mass-deportation-plan-1930s-repatriation-program>; Becky Little, *The Deportation Campaigns of the Great Depression*, HISTORY (July 12, 2019), <https://www.history.com/articles/great-depression-repatriation-drives-mexico-deportation>.

22 ¹² Wang, *supra* note 11.

23 ¹³ *Id.*

24 ¹⁴ *Id.*

25 ¹⁵ Kate Linthicum, *The dark, complex history of Trump's model for his mass*
26 *deportation plan*, LA Times (Nov. 13, 2015), <https://www.latimes.com/nation/la-na-trump-deportation-20151113-story.html>; Adriana Gomez Licon, *Trump's vow to*
27 *deport millions is undercut by history*, PBS News (Jan. 3, 2024),
28 <https://www.pbs.org/newshour/politics/trumps-vow-to-deport-millions-is-undercut-by-history>.

¹⁶ Steve Inskeep & Christopher Thomas, *Trump promised the 'largest*
deportation' in U.S. history. Here's how he might start, NPR (Nov. 14, 2024),
<https://www.npr.org/2024/11/12/nx-s1-5181962/trump-promises-a-mass-deportation-on-day-1-what-might-that-look-like>.

¹⁷ See Licon, *supra* note 15.

1 break.¹⁸ It is unsurprising, then, that the current raids in Los Angeles appear to bear
2 many of the same hallmarks as the earlier mass deportation efforts that are now
3 shameful chapters of American history.¹⁹

4 In sum, California and Amici States have a critical interest in ensuring that
5 defendants cease the suspicionless stops of California's residents that harm its
6 communities, local economies, and public safety.

7 ARGUMENT

8 Amici States file this brief in support of the requested temporary restraining
9 order. We focus here on one of the four factors at issue: whether preliminary relief
10 is in the public interest. *Winter v. Nat. Res. Def. Council*, 555 U.S. 7, 20 (2008);
11 *Stuhlbarg Int'l Sales Co. v. John D. Brush & Co.*, 240 F.3d 832, 839 n.7 (9th Cir.
12 2001) (standard for temporary restraining order the same as for preliminary
13 injunction). The public interest is particularly relevant where the impact of the
14 dispute reaches beyond the parties and carries the potential for public
15 consequences. *Stormans, Inc. v. Selecky*, 586 F.3d 1109, 1139 (9th Cir. 2009);
16 *Golden Gate Rest. Ass'n v. City & Cnty. of S.F.*, 512 F.3d 1112, 1126–27 (9th Cir.
17 2008). Third-party harms that are relevant to the public interest analysis include
18 economic and employment-based harms;²⁰ public health harms;²¹ public safety

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23 ¹⁸ Forbes Breaking News, *Trump Promises To Use The Alien Enemies Act Of 1798 To Launch Mass Deportation Effort*, YouTube (Oct. 26, 2024),
<https://www.youtube.com/watch?v=Qug9CnUlkYg> (at 0:38).

24 ¹⁹ Linthicum, *supra* note 15; Licon, *supra* note 15.

25 ²⁰ *Nat'l Ass'n of Mfrs. v. U.S. Dep't of Homeland Sec.*, 491 F. Supp. 3d 549,
571 (N.D. Cal. 2020) (enjoining limitation on certain nonimmigrant work visas and
26 noting harms to "hundreds of thousands of American businesses of all sizes and
economic sectors.").

27 ²¹ *Washington v. United States Food & Drug Admin.*, 668 F. Supp. 3d 1125,
1142 (E.D. Wash.), *opinion clarified*, 669 F. Supp. 3d 1057 (E.D. Wash. 2023)
28 (concluding that public interest favored injunctive relief "[b]ased on the public
health and administrative considerations at issue in this case.").

1 harms;²² and impacts to public services.²³ As discussed below, these and many
2 other cognizable harms will continue to impact California if preliminary relief is
3 not granted.

4
5 **I. DEFENDANTS' ACTIONS HAVE INTIMIDATED COMMUNITIES, SCARRED
CIVIL SOCIETY, AND SHAKEN LOCAL ECONOMIES.**

6 Defendants' actions have harmed local economies, public health, and several
7 other aspects of daily life. Moreover, although defendants claim to be conducting a
8 targeted operation aimed at criminals without legal status, they are instead
9 conducting stops without reasonable suspicion, which in turn has impacted
10 countless Los Angeles residents regardless of immigration status. *See* ECF 45 at 7-
11 9; 20-22.

12
13 **A. Defendants' conduct has wrought harms throughout the Los
Angeles community.**

14 Unlawful, suspicionless stops of Los Angeles residents have harmed local
15 communities in at least three ways.

16 *First*, these actions have disrupted the local economy because both workers
17 and customers, regardless of immigration status, are afraid to leave their homes.
18 Restaurants have closed and festivals and farmers markets have been cancelled.²⁴
19 For example, the Wilmington Farmers Market recently shut down, stating: "Due to
20 increased ICE activity in Wilmington, many of our farmers are scared and have
21 chosen not to attend... We do hope to one day reopen... but for now, we must step

22 ²² *City & Cnty. of S.F. v. USCIS*, 981 F.3d 742, 762 (9th Cir. 2020)
23 (affirming injunction against DHS's redefinition of "public charge," acknowledging
24 that the rule would have "adverse effects on the health and welfare of the immigrant
as well as general population"); *Earth Island Inst. v. Elliott*, 290 F. Supp. 3d 1102,
1125-26 (E.D. Cal. 2017) (examining public safety implications of proposed
injunction on Forest Service tree removal project).

25 ²³ *City & Cnty. of S.F. v. Trump*, 897 F.3d 1225, 1244 (9th Cir. 2018) ("[T]he
26 public interest cannot be disserved by an injunction that brings clarity to all parties
and to citizens dependent on public services.").

27 ²⁴ Levi Sumagaysay & Lauren Hepler, *From San Diego to the Bay Area,*
28 *California restaurants are on edge over immigration raids*, CalMatters (June 19,
2025), [https://calmatters.org/economy/2025/06/california-restaurants-immigration-
raids/](https://calmatters.org/economy/2025/06/california-restaurants-immigration-raids/).

1 away.”²⁵ Foot traffic in Artesia’s Little India has slowed considerably, especially
2 after a raid at a local car wash.²⁶ The owner of an Indian clothing store said the pace
3 of business was worse than during the COVID pandemic and that people “are afraid
4 to be questioned, even if they are here legally.”²⁷ These and other impacts led the
5 Los Angeles Chamber of Commerce to issue a statement explaining that “the
6 Administration’s recent enforcement actions undermine public safety, harm our
7 communities, and destabilize our economy.”²⁸

8 *Second*, Los Angeles residents are afraid to seek medical treatment. Hospitals
9 and clinics are on “high alert.”²⁹ St. John’s Community Health, a network of
10 community centers across Los Angeles, has seen its cancellation rate more than
11 triple since the raids began.³⁰ Undocumented parents are cancelling appointments
12 for their U.S. citizen children,³¹ and patients are wary of sharing identifying
13 information with providers.³² One woman who had regularly attended appointments
14 for diabetes stopped coming to her community clinic.³³ When staff visited her home
15 to provide care, they learned she had not left the house for five days; she had

16 ²⁵ *Id.*

17 ²⁶ Christina Gonzalez, *ICE raids stir fear in Artesia’s Little India and Asian*
18 *communities across LA*, Fox 11 Los Angeles (June 24, 2025),
[https://www.foxla.com/news/ice-raids-impacting-asian-american-communities-in-](https://www.foxla.com/news/ice-raids-impacting-asian-american-communities-in-la)
[la](https://www.foxla.com/news/ice-raids-impacting-asian-american-communities-in-la).

19 ²⁷ *Id.*

20 ²⁸ L.A. Area Chamber, *L.A. Area Chamber Urges Calm and Calls for De-*
escalation Amid Immigration Raids (June 9, 2025), Los Angeles Area Chamber of
21 Commerce, [https://lachamber.com/news/2025/06/09/press-release/l.a.-area-](https://lachamber.com/news/2025/06/09/press-release/l.a.-area-chamber-urges-calm-and-calls-for-de-escalation-amid-immigration-raids/)
[chamber-urges-calm-and-calls-for-de-escalation-amid-immigration-raids/](https://lachamber.com/news/2025/06/09/press-release/l.a.-area-chamber-urges-calm-and-calls-for-de-escalation-amid-immigration-raids/).

22 ²⁹ Ana B. Ibarra, *‘We held our ground’: LA-area health clinic describes close*
encounter with immigration agents, CalMatters (June 14, 2025),
<https://calmatters.org/health/2025/06/la-area-medical-clinic-immigration-agents/>.

23 ³⁰ Shreyas Teegala, *Fearing Ice raids, some LA residents skip doctor’s visits:*
‘Everybody’s life is on pause’, The Guardian (June 24, 2025),
24 [https://www.theguardian.com/us-news/2025/jun/24/ice-raids-healthcare-los-](https://www.theguardian.com/us-news/2025/jun/24/ice-raids-healthcare-los-angeles-ohio)
[angeles-ohio](https://www.theguardian.com/us-news/2025/jun/24/ice-raids-healthcare-los-angeles-ohio).

25 ³¹ Mark Kreidler, *A Fear Pandemic Grips Safety Net Hospitals and Their*
Patients, The American Prospect (June 27, 2025), [https://prospect.org/justice/2025-](https://prospect.org/justice/2025-06-27-immigration-ice-health-care-hospitals/)
[06-27-immigration-ice-health-care-hospitals/](https://prospect.org/justice/2025-06-27-immigration-ice-health-care-hospitals/)

26 ³² See Ibarra, *supra* note 29; see also Kimberly Kindy & Amanda Seitz,
27 *Trump Administration Gives Personal Data of Immigrant Medicaid Enrollees to*
Deportation Officials, Associated Press (June 14, 2025),
<https://tinyurl.com/3cczkcn3>.

28 ³³ Kreidler, *supra* note 31.

1 subsisted on tortillas and coffee, and her blood-sugar level was spiking.³⁴ These
2 individual accounts are in keeping with studies showing that aggressive
3 enforcement tactics, such as those at issue in this litigation, deter residents from
4 seeking medical treatment.³⁵ That deterrence, in turn, impacts the broader health of
5 the community because “[p]ublic health is served when individuals freely seek
6 preventive care and do not stave off care until they need emergency room treatment
7 in the midst of a health crisis.” *Philadelphia v. Sessions*, 280 F. Supp. 3d 579, 609
8 (E.D. Pa. 2017), *subsequent judgment aff’d in relevant part*, 916 F.3d 276 (3d Cir.
9 2019).³⁶

10 *Third*, defendants’ actions have chilled participation in countless other
11 activities of daily life. The current operation began just as the school year was
12 ending, leading some families to switch their children to online classes and others
13 to skip graduation ceremonies.³⁷ Indeed, it has been repeatedly shown that
14 aggressive enforcement tactics lead to increased school absences and lower

15 _____
16 ³⁴ *Id.*

17 ³⁵ See, e.g., Sezer Kisa & Adnan Kisa, “No Papers, No Treatment”:
18 *A Scoping Review of Challenges Faced by Undocumented Immigrants in Accessing*
19 *Emergency Healthcare*, 23 Int’l J. for Equity in Health, no. 184, at 2, 6, 8 (2024);
20 Scott D. Rhodes et al., *The Impact of Local Immigration Enforcement Policies on*
21 *the Health of Immigrant Hispanics/Latinos in the United States*, 105 Am. J. Pub.
22 Health 329, 332 (Feb. 2015) (finding that immigrants reported that they “did not
23 access or utilize health services for which they were eligible, including preventive
24 services,” because “[t]hey worried that . . . their lack of documentation . . . would
25 put them at risk for detention and deportation.”).

26 ³⁶ See also, e.g., Cassandra D. Kelly-Cirino et al., *Importance of Diagnostics*
27 *in Epidemic and Pandemic Preparedness*, 4 BMJ Glob. Health 1, 1, 6-7 (2019);
28 Mark Perkins et al., *Diagnostic Preparedness for Infectious Disease Outbreaks*,
390 The Lancet 2211, 2211 (2017); Alejandro Portes et al., *The U.S. Health System*
29 *and Immigration: An Institutional Interpretation*, 24 Socio. Forum 487, 501-502,
30 506 (2009).

31 ³⁷ Andrea Castillo & Queenie Wong, *L.A. Immigration Raids Force the*
32 *Undocumented to Trade Their Freedom for Safety*, L.A. Times (June 26, 2025),
33 [https://www.latimes.com/politics/story/2025-06-26/online-church-school-and-](https://www.latimes.com/politics/story/2025-06-26/online-church-school-and-doctor-afraid-of-ice-raids-immigrants-go-digital)
34 [doctor-afraid-of-ice-raids-immigrants-go-digital](https://www.latimes.com/politics/story/2025-06-26/online-church-school-and-doctor-afraid-of-ice-raids-immigrants-go-digital); Mariana Dale, *LAUSD Leaders*
35 *Decry Immigration Raids as Stoking Fear During Graduation Season*, LAist (June
36 9, 2025, 12:22 PM), [https://laist.com/news/education/la-unified-ice-national-guard-](https://laist.com/news/education/la-unified-ice-national-guard-response)
37 [response](https://laist.com/news/education/la-unified-ice-national-guard-response); Kayla Jimenez, *How LA School Graduations Became the Epicenter of*
38 *Fear for ICE Family Separations*, USA Today (June 13, 2025, 6:54 PM),
39 [https://www.usatoday.com/story/news/politics/2025/06/11/los-angeles-schools-](https://www.usatoday.com/story/news/politics/2025/06/11/los-angeles-schools-ice/84126553007/)
40 [ice/84126553007/](https://www.usatoday.com/story/news/politics/2025/06/11/los-angeles-schools-ice/84126553007/).

1 academic engagement.³⁸ Hallmarks of summer, such as swim lessons and city-
 2 sponsored Fourth of July celebrations, have been cancelled.³⁹ Places of worship
 3 have also seen steep declines in attendance.⁴⁰ Indeed, immigration agents recently
 4 detained migrants at two southern California parishes, and a Pentecostal church in
 5 East Los Angeles has lost nearly half of its in-person membership.⁴¹ Locations
 6 throughout Los Angeles have been targeted: agents have conducted stops and
 7 arrests at bus stops, car washes, grocery stores, taco trucks, clothing stores,
 8 courthouses, juice bars, and Home Depots.⁴²

9 ³⁸ Carolyn Jones, 'Afraid to Go to School': Immigrant Families in Salinas
 10 are Gripped by Fear, San Gabriel Valley Tribune (Feb. 20, 2025, 2:32 PM),
 11 <https://tinyurl.com/afraid-to-go-to-school>; Ana Martinez-Donate et al., *Between the*
 12 *Lines: A Mixed-Methods Study on the Impacts of Parental Deportation on the*
 13 *Health and Well-Being of U.S. Citizen Children*, 9 J. Migration & Health 1, 5, 7
 14 (2024).

15 ³⁹ Jesus Jiménez et al., 'Completely Disrupted': Fear Upends Life for Latinos
 16 in L.A., N.Y. Times (June 30, 2025),
 17 <https://www.nytimes.com/2025/06/30/us/latinos-los-angeles-immigration.html>.

18 ⁴⁰ Anita Snow & Debadrita Sur, *ICE Agents Detain Migrants on Church*
 19 *Grounds at 2 California Parishes, Diocese Says*, National Catholic Reports (June
 20 26, 2025), [https://www.ncronline.org/news/ice-agents-detain-migrants-church-](https://www.ncronline.org/news/ice-agents-detain-migrants-church-grounds-2-california-parishes-diocese-says)
 21 [grounds-2-california-parishes-diocese-says](https://www.ncronline.org/news/ice-agents-detain-migrants-church-grounds-2-california-parishes-diocese-says).

22 ⁴¹ Castillo & Wong, *supra* note 37.

23 ⁴² Rong-Gong Lin II, *Reports of Immigration Raid at Bus Stop in Pasadena*
 24 *Spark Outrage*, L.A. Times (June 19, 2025),
 25 [https://www.latimes.com/california/story/2025-06-19/elected-officials-outraged-](https://www.latimes.com/california/story/2025-06-19/elected-officials-outraged-immigration-raid-pasadena-bus-stop)
 26 [immigration-raid-pasadena-bus-stop](https://www.latimes.com/california/story/2025-06-19/elected-officials-outraged-immigration-raid-pasadena-bus-stop); Kaitlyn Huamani & Suhauna Hussain, *More*
 27 *L.A. Car Washes Targeted in Immigration Raids, Some Closed Amid Fears of*
 28 *Further Sweeps*, L.A. Times (June 20, 2025),
[https://www.latimes.com/business/story/2025-06-20/la-car-washes-targeted-](https://www.latimes.com/business/story/2025-06-20/la-car-washes-targeted-immigration-raids-business-closures)
[immigration-raids-business-closures](https://www.latimes.com/business/story/2025-06-20/la-car-washes-targeted-immigration-raids-business-closures); Brittney Mejia & Anita Chabria, *At a Troubled*
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 2, 2025), [https://www.latimes.com/california/story/2025-06-10/los-angeles-](https://www.latimes.com/california/story/2025-06-10/los-angeles-ambiance-apparel-workers-ice-raid)
[ambiance-apparel-workers-ice-raid](https://www.latimes.com/california/story/2025-06-10/los-angeles-ambiance-apparel-workers-ice-raid); Jonaki Mehta et al., *This Beloved Mexican*
Market in LA is Losing Business Amid Immigration Raids, LAist (June 25, 2025,
 11:00 AM), [https://laist.com/news/beloved-mexican-market-in-la-is-losing-](https://laist.com/news/beloved-mexican-market-in-la-is-losing-business-amid-immigration-raids)
[business-amid-immigration-raids](https://laist.com/news/beloved-mexican-market-in-la-is-losing-business-amid-immigration-raids); Maanvi Singh, *At Home Depot, ICE Raids*
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 Guardian (June 16, 2025, 7:44 AM), [https://www.theguardian.com/us-](https://www.theguardian.com/us-news/2025/jun/16/home-depot-ice-raids-los-angeles)
[news/2025/jun/16/home-depot-ice-raids-los-angeles](https://www.theguardian.com/us-news/2025/jun/16/home-depot-ice-raids-los-angeles), Bill Esparza, *LA's Mexican*
and Central American Street Food Vendors Go Into Hiding as ICE Raids Continue,
 Eater (June 18, 2025, 4:00 PM), [https://la.eater.com/restaurant-news/285278/los-](https://la.eater.com/restaurant-news/285278/los-angeles-ice-raid-street-food-vendors-taqueritos-taco-stands-trucks-hiding)
[angeles-ice-raid-street-food-vendors-taqueritos-taco-stands-trucks-hiding](https://la.eater.com/restaurant-news/285278/los-angeles-ice-raid-street-food-vendors-taqueritos-taco-stands-trucks-hiding); Alex
 Rozier & Karla Rendon, *New Surveillance Footage Shows Different Angle of Man's*
Arrest in Pico Rivera, NBC Los Angeles (June 18, 2025, 6:35 PM),
[https://www.nbclosangeles.com/news/local/new-surveillance-footage-shows-](https://www.nbclosangeles.com/news/local/new-surveillance-footage-shows-different-angle-of-mans-arrest-in-pico-rivera/3727793/)
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 (continued...)

1 In short, the conduct challenged in this litigation has wrought harms
2 throughout California's most populous region. The impacts to local economies,
3 public health, and other core features of civil society counsel in favor of
4 preliminary relief.

5
6 **B. Unlawful stops have impacted residents regardless of their
immigration status.**

7 The chilling effect of defendants' conduct is not limited to undocumented
8 immigrants. Indeed, defendants' tactics have led to the detention of those with legal
9 status, including citizens.⁴³ In one recent incident, masked Border Patrol agents in
10 an unmarked S.U.V. descended on an autobody shop and reportedly pushed its
11 owner, plaintiff Jason Brian Gavidia—a United States citizen—against a fence.⁴⁴
12 While they twisted his arm, he said "I'm an American, bro!" and in response they
13 demanded to know what hospital he was born in.⁴⁵ He was later released.⁴⁶ Finally,
14 although the operation purportedly targets so-called "criminal aliens," defendants'
15 tactics have primarily wrapped in individuals without any criminal history.⁴⁷

16 *at L.A. Courthouse Met with Alarm: 'Absolutely Blindsided',* L.A. Times (June 25,
17 2025), <https://www.latimes.com/california/story/2025-06-25/ice-arrests-los-angeles-courthouse>.

18 ⁴³ Sam Levin, *ICE Agents Detain US Citizen as LA Immigration Raids*
Continue: 'It's Racial Profiling,' The Guardian (June 16, 2025, 6:42 PM),
19 <https://www.theguardian.com/us-news/2025/jun/16/los-angeles-immigration-raids-montebello>;
20 *see also* Suzanne Gamboa & Nicole Acevedo, *Trump Immigration Raids Snag U.S. Citizens, Including Native Americans, Raising Racial Profiling Fears*, NBC News (Jan. 28, 2025, 12:26 PM),
21 <https://www.nbcnews.com/news/latino/trump-immigration-raids-citizens-profiling-accusations-native-american-rcna189203>; *see also* L.J. Wolfgang Keppley,
22 *Mistaken Detainment, Racial Profiling, and Discrimination: How ICE Fails to Protect Communities*, Niskanen Center (December 14, 2020),
23 <https://www.niskanencenter.org/mistaken-detainment-racial-profiling-and-discrimination-how-ice-fails-to-protect-communities/>.

24 ⁴⁴ Jennifer Medina, *'I'm an American, Bro!': Latinos Report Raids in Which U.S. Citizenship Is Questioned*, N.Y. Times (June 15, 2025),
25 <https://www.nytimes.com/2025/06/15/us/hispanic-americans-raids-citizenship.html?partner=slack&smid=sl-share>.

26 ⁴⁵ *Id.*

⁴⁶ *Id.*

27 ⁴⁷ Rachel Uranga, *Most Nabbed in L.A. Raids Were Men with No Criminal Conviction, Picked Up Off the Street*, L.A. Times (June 24, 2025, 5:16 PM),
28 <https://www.latimes.com/california/story/2025-06-24/detention-centers-swell-with->

(continued...)

Given defendants’ enforcement tactics, it is not surprising that a “show me your papers” regime has emerged.⁴⁸ As District Court Judge Jennifer L. Thurston recently noted before enjoining similar conduct in the Central Valley: “You just can’t walk up to people with brown skin and say give me your papers.”⁴⁹ But that is precisely what defendants have done in Los Angeles. *See* ECF 45 at 7-9. As a result, some people now carry passports with them to run routine errands.⁵⁰ Tony Marquez, a retired Verizon worker born in San Diego, now takes his driver’s license with him on neighborhood walks.⁵¹ He told the New York Times: “I’m a boring senior that lives in Boyle Heights that likes to go for walks, and for the first time in history, I don’t feel safe.”⁵²

Ultimately, defendants have turned the thriving, diverse community of Los Angeles into a community residing in fear. The predictable impacts are far-reaching and counsel in favor of a temporary restraining order.

II. DEFENDANTS’ TACTICS HAVE SOWN DISTRUST AND CONFUSION THAT IMPEDES LOCAL LAW ENFORCEMENT.

The authority and duty to enforce criminal codes is integral to state sovereignty. *See, e.g., Alfred L. Snapp & Son, Inc. v. P.R. ex rel. Barez*, 458 U.S. 592, 601 (1982). But defendants’ tactics have caused widespread confusion, delays, and danger for both local law enforcement and the community it protects.

Immigration agents’ efforts to hide their identifies and affiliations—via ski masks, [immigrants-with-no-criminal-record](#); Bernd Debusmann Jr., *Who Has Been Arrested by ICE Under Trump?*, BBC (June 11, 2025), <https://www.bbc.com/news/articles/c86p821p660o> (noting that “border czar” Tom Homan referred to these arrests as “collateral” damage).

⁴⁸ *See, e.g., Sergio Olmos et al., Taken: What Happens After an LA Immigration Raid*, CalMatters (June 28, 2025), <https://calmatters.org/investigation/2025/06/taken-la-immigration-raids/>.

⁴⁹ Sergio Olmos & Wendy Fry, *Judge Restricts Border Patrol in California: ‘You Just Can’t Walk up to People with Brown Skin’*, CalMatters (April 29, 2025), <https://calmatters.org/justice/2025/04/border-patrol-injunction/>; *United Farm Workers, et al. v. Noem, et al.*, 25-CV-00246, Dkt. 47 (E.D. Cal., April 29, 2025) (granting plaintiffs’ motion for preliminary injunction).

⁵⁰ Jesus Jiménez et al., *supra* note 39.

⁵¹ *Id.*

⁵² *Id.*

1 dark sunglasses, plainclothes, and unmarked vehicles—and refusal to identify
2 themselves have made it difficult to distinguish them from criminals. Thus, the
3 Pasadena Police Department recently investigated reports of a man stepping out of
4 an unmarked car, pointing a firearm at a group of pedestrians, then speeding off
5 after activating red and blue emergency lights.⁵³ The police later determined “to the
6 best of [their] estimation he was an ICE agent.”⁵⁴ Local law enforcement has also
7 responded to reports of kidnappings and hit-and-run incidents, only to later
8 determine that the incidents were part of ICE operations.⁵⁵ The frequency of such
9 incidents prompted Pasadena’s mayor to note: “One question [is,] is this a law
10 enforcement agent or someone pretending to be a law enforcement agent, and there
11 is no good answer here.”⁵⁶ Indeed, there have been several recent arrests of
12 civilians impersonating ICE officers to commit crimes.⁵⁷

13 The defendants’ conduct has also eroded trust between local law enforcement
14 and the community it protects. Those without legal status are already less likely to
15 report crime—even crimes in which they themselves are victims—out of “fear that

16 ⁵³ Nathan Solis & Richard Winton, *‘Who Are These People?’ Masked*
17 *Immigration Agents Challenge Local Police, Sow Fear in L.A.*, L.A. Times (June
24, 2025, 6:00 AM), <https://www.latimes.com/california/story/2025-06-24/masked-immigration-agents-local-law-enforcement-tension>.
18

18 ⁵⁴ *Id.*

19 ⁵⁵ Alex Stone, *Los Angeles Police Responded to a Kidnapping Call. But*
20 *Instead Found an ICE Operation*, ABC News (June 25, 2025, 5:06 PM),
<https://abcnews.go.com/US/los-angeles-police-responded-kidnapping-call-found-ice/story?id=123204661>.

21 ⁵⁶ Solis & Winton, *supra* note 53.

22 ⁵⁷ Jose Olivares, *US Sees Spate of Arrests of Civilians Impersonating ICE*
23 *Officers*, The Guardian (June 28, 2025, 5:14 PM), [https://www.theguardian.com/us-](https://www.theguardian.com/us-news/2025/jun/28/civilians-impersonating-ice-officers)
24 [news/2025/jun/28/civilians-impersonating-ice-officers](https://www.theguardian.com/us-news/2025/jun/28/civilians-impersonating-ice-officers). At least two bills have been
25 introduced in the California legislature to prohibit, with certain exceptions, all law
26 enforcement officers from using face coverings and/or require more visible forms
27 of identification. See Office of Senator Scott Wiener, *Senators Wiener & Arreguin*
28 *Announce Legislation To Prohibit Local, State & Federal Law Enforcement From*
Covering Their Faces & Require Stronger Identification, Press Release (June 16,
2025), [https://sd11.senate.ca.gov/news/senators-wiener-arreguin-announce-](https://sd11.senate.ca.gov/news/senators-wiener-arreguin-announce-legislation-prohibit-local-state-federal-law-enforcement)
[legislation-prohibit-local-state-federal-law-enforcement](https://sd11.senate.ca.gov/news/senators-wiener-arreguin-announce-legislation-prohibit-local-state-federal-law-enforcement); Office of Senator Renée
Pérez, *Senator Pérez and Community Leaders Announce Bill to Establish Clear*
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Authority in California, Press Release (June 23, 2025),
[https://sd25.senate.ca.gov/news/senator-perez-and-community-leaders-announce-](https://sd25.senate.ca.gov/news/senator-perez-and-community-leaders-announce-bill-establish-clear-identification-requirements)
[bill-establish-clear-identification-requirements](https://sd25.senate.ca.gov/news/senator-perez-and-community-leaders-announce-bill-establish-clear-identification-requirements).

[officials] will ask . . . about [their] immigration status.”⁵⁸ Fear of removal, or of having a family or community member removed, makes victims and witnesses reluctant to come forward, to testify in court, and even to seek safety in a domestic violence shelter.⁵⁹ In Los Angeles, those challenges have intensified in light of the fear that currently paralyzes the immigrant community.

Accordingly, defendants’ unlawful practices have not only created a culture of fear that has disrupted community life, but has also impeded the daily operations of local law enforcement.

CONCLUSIONS

For the foregoing reasons, the public interest counsels in favor of preliminary relief, and the plaintiffs’ application for temporary restraining order should be granted.

Dated: July 7, 2025

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⁵⁸ See, e.g., 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, 6 (2013), <https://tinyurl.com/Insecure-Communities>.
⁵⁹ 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>.

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CERTIFICATE OF COMPLIANCE

The undersigned, counsel of record for Amici States, certifies that this brief contains 4,091 words, which complies with the word limit of Local Rule 11-6.1.

s/ Jesse P. Basbaum
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