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10  
11 IN THE UNITED STATES DISTRICT COURT  
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
13

14 Pedro VASQUEZ PERDOMO, *et al.*,  
15 Plaintiffs,

16 v.

17 KRISTI NOEM, in her official capacity  
as Secretary of the Department of  
18 Homeland Security, *et al.*,

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

**[PROPOSED] BRIEF OF AMICI  
CURIAE STATES OF  
CALIFORNIA, ARIZONA,  
COLORADO, CONNECTICUT,  
DELAWARE, HAWAI'I,  
ILLINOIS, MASSACHUSETTS,  
MARYLAND, MAINE,  
MINNESOTA, NEVADA, NEW  
JERSEY, NEW YORK, OREGON,  
VERMONT, AND WASHINGTON  
IN SUPPORT OF STOP/ARREST  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION  
[ECF 128]**

Date: September 24, 2025  
Time: 9:00 a.m.  
Place: Courtroom 8B

Hon. Maame Ewusi-Mensah Frimpong

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## INTRODUCTION

As this court recognized in granting a temporary restraining order, the immigration operations in the Los Angeles area—which began on or around June 6, 2025 and have continued throughout the summer—were likely unlawful. ECF 87 (“TRO”) at 35, 37-41. Specifically, the court concluded that defendants’ dragnet approach to enforcement has included countless detentive stops that violate the Fourth Amendment because they relied solely on apparent race, spoken language, location, and/or occupation. TRO at 38-46. Amici States<sup>1</sup> now submit this brief in support of the Stop/Arrest Plaintiffs motion for a preliminary injunction (ECF 128) to show that injunctive relief is in the public interest.

The ongoing raids in Southern California shattered the 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 left people afraid to leave their homes. Restaurants closed, local businesses suffered, and families skipped graduation ceremonies. Residents have been hesitant to seek healthcare, and many churches were nearly empty. The cumulative effect of defendants’ unlawful actions—including unconstitutional stops—has had devastating impacts on California’s peace and prosperity, and turned once-bustling neighborhoods into ghost towns.<sup>2</sup>

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

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<sup>1</sup> The Amici States include: California, Arizona, Colorado, Connecticut, Delaware, Hawai‘i, Illinois, Maryland, Maine, Minnesota, Nevada, New Jersey, New York, Oregon, Vermont, Washington, and the Commonwealth of Massachusetts.

<sup>2</sup> 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 impeded local law enforcement. Because their vehicles and uniforms are not clearly  
2 marked—and their tactics can be highly aggressive—the public cannot easily  
3 discern who is a federal law enforcement agent and who may be a criminal. Indeed,  
4 copycat crimes in which masked perpetrators imitate ICE agents are on the rise.  
5 Equally concerning, defendants’ conduct has undermined the trust, built over years,  
6 between local law enforcement and the immigrant community. The confusion and  
7 distrust sown by defendants’ unlawful law enforcement practices has thus  
8 compromised public safety.

9 In light of these serious negative impacts, the preliminary injunction sought by  
10 the plaintiffs is in the public interest and should be granted.

### 11 **BACKGROUND & INTEREST OF AMICUS CURIAE**

12 The Amici States have a profound interest in safeguarding the rights and well-  
13 being of all of their residents, regardless of where they were born, and immigrants  
14 are an integral part of Amici States’ social fabric. California alone is the proud  
15 home of 10.6 million immigrants, and the Amici States together are home to  
16 approximately 25.6 million immigrants.<sup>3</sup> Almost half of all California children have  
17 at least one immigrant parent.<sup>4</sup> Immigrants in California, with and without legal  
18 status, are “students, teachers, artists, chefs, business owners, religious leaders,  
19 colleagues, neighbors, family members, and more.”<sup>5</sup> Immigrants also stimulate the  
20 economy as entrepreneurs, STEM workers, taxpayers, and consumers.<sup>6</sup>

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22  
23 <sup>3</sup> Marisol Cuellar Mejia et al., *Immigrants in California*, Public Policy  
24 Institute of California (Jan. 2025), <https://www.ppic.org/publication/immigrants-in-california/>; United States Census Bureau, *U.S. Foreign-Born Population* (April 9,  
25 2024), <https://www.census.gov/library/visualizations/interactive/foreign-born-population-2018-2022.html>.

26 <sup>4</sup> Cuellar Mejia, *supra* note 3.

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

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

1 Accordingly, in carrying out suspicionless stops, defendants are targeting  
2 California's diverse communities and chilling civic and economic participation.  
3 And this is only made worse by defendants' aggressive and secretive tactics, which  
4 make Los Angeles less safe and undermine local law enforcement. Although these  
5 tactics are currently focused on Los Angeles, defendants have conducted operations  
6 in other cities and counties in California and throughout the country, including in  
7 the Amici States.<sup>7</sup> Thus, California and the Amici States have a significant interest  
8 in this Court enjoining defendants from conducting stops that violate the Fourth  
9 Amendment.

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

21 This is not the first time that California has been at the center of mass  
22 deportation efforts, and unfortunately the State has felt the impacts of these

23  
24 <sup>7</sup> See, e.g., Guy Oron, *ICE ramps up attacks on immigrant communities in*  
25 *Washington*, Real Change News (Apr. 9, 2025),  
26 <https://www.realchangenews.org/news/2025/04/09/ice-ramps-attacks-immigrant-communities-washington>; Jeff Coltin, *ICE will 'flood the zone' in NYC*, Politico (July 21, 2025), [https://www.politico.com/news/2025/07/21/ice-new-york-city-enforcement-00465313?ICID=ref\\_fark](https://www.politico.com/news/2025/07/21/ice-new-york-city-enforcement-00465313?ICID=ref_fark).

27 <sup>8</sup> Donald J. Trump, Truth Social (Jun. 15, 2025),  
<https://truthsocial.com/@realDonaldTrump/posts/114690267066155731>.

28 <sup>9</sup> 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).

1 campaigns before. In 1954, California was one of the first two states targeted under  
2 “Operation Wetback,” a mass deportation campaign that took its name from an  
3 ethnic slur.<sup>10</sup> An earlier iteration of the campaign, in the 1930s, also targeted Los  
4 Angeles.<sup>11</sup> The “La Placita sweep” was the first public immigration raid in Los  
5 Angeles, and one of the largest such raids that roiled the country during the Great  
6 Depression.<sup>12</sup> During this time, Mexican farm workers were indiscriminately  
7 blamed for job shortages and shrinking public benefits.<sup>13</sup> The Depression-era  
8 campaign resulted in the deportation of nearly two million Mexican Americans,  
9 more than half of whom were U.S. citizens, without due process.<sup>14</sup> Families were  
10 separated, and many children never again saw their parents.<sup>15</sup> Historians and  
11 scholars have condemned these discriminatory raids as inhumane terror  
12 campaigns.<sup>16</sup>

13 Yet prior to his election, then-candidate Donald Trump promised an  
14 aggressive and militaristic mass deportation program that would be “the largest  
15 deportation program ... in the history of America.”<sup>17</sup> He praised Operation

16 <sup>10</sup> U.S. House of Representatives, *Depression, War, and Civil Rights*,  
17 Historical Essays, [https://history.house.gov/Exhibitions-and-](https://history.house.gov/Exhibitions-and-Publications/HAIC/Historical-Essays/Separate-Interests/Depression-War-Civil-Rights/)  
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20 <sup>11</sup> Gustavo Arellano, *Trump's immigration hammer bonks L.A. When will it*  
21 *smash down?*, L. A. Times (June 9, 2025),  
22 [https://www.latimes.com/california/newsletter/2025-06-09/1931-la-placita-olvera-](https://www.latimes.com/california/newsletter/2025-06-09/1931-la-placita-olvera-raid)  
23 [raid](https://www.latimes.com/california/newsletter/2025-06-09/1931-la-placita-olvera-raid).

24 <sup>12</sup> Claire Wang, *Millions of Mexican Americans were deported in the 1930s. Are we about to repeat this ‘ethnic cleansing’?*, The Guardian (Dec. 3, 2024),  
25 [https://www.theguardian.com/us-news/2024/dec/03/trump-mass-deportation-plan-](https://www.theguardian.com/us-news/2024/dec/03/trump-mass-deportation-plan-1930s-repatriation-program)  
26 [1930s-repatriation-program](https://www.theguardian.com/us-news/2024/dec/03/trump-mass-deportation-plan-1930s-repatriation-program); Becky Little, *The Deportation Campaigns of the Great*  
27 *Depression*, HISTORY (July 12, 2019), [https://www.history.com/articles/great-](https://www.history.com/articles/great-depression-repatriation-drives-mexico-deportation)  
28 [depression-repatriation-drives-mexico-deportation](https://www.history.com/articles/great-depression-repatriation-drives-mexico-deportation).

<sup>13</sup> Wang, *supra* note 12.

<sup>14</sup> *Id.*

<sup>15</sup> *Id.*

25 <sup>16</sup> 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-](https://www.latimes.com/nation/la-na-trump-deportation-20151113-story.html)  
27 [na-trump-deportation-20151113-story.html](https://www.latimes.com/nation/la-na-trump-deportation-20151113-story.html); Adriana Gomez Licon, *Trump's vow to*  
28 *deport millions is undercut by history*, PBS News (Jan. 3, 2024),  
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<sup>17</sup> Steve Inskeep & Christopher Thomas, *Trump promised the 'largest*

(continued...)

1 Wetback as an enforcement model and hailed the Eisenhower administration for  
2 setting the record for deportations—a record he said his administration would  
3 break.<sup>18</sup> It is unsurprising, then, that the current raids in Los Angeles appear to bear  
4 many of the same hallmarks as the earlier mass deportation efforts that are now  
5 shameful chapters of American history.<sup>19</sup>

6 California and Amici States thus have a critical interest in ensuring that  
7 defendants cease the suspicionless stops of California’s residents that harm its  
8 communities, local economies, and public safety.

### 9 ARGUMENT

10 Amici States file this brief in support of the requested preliminary injunction.  
11 We focus here on one of the four factors at issue: whether preliminary relief is in  
12 the public interest. *Winter v. Nat. Res. Def. Council*, 555 U.S. 7, 20 (2008). The  
13 public interest is particularly relevant where the impact of the dispute reaches  
14 beyond the parties and carries the potential for public consequences. *Stormans, Inc.*  
15 *v. Selecky*, 586 F.3d 1109, 1139 (9th Cir. 2009); *Golden Gate Rest. Ass’n v. City &*  
16 *Cnty. of S.F.*, 512 F.3d 1112, 1126–27 (9th Cir. 2008). Third-party harms that are  
17 relevant to the public interest analysis include economic and employment-based  
18 harms;<sup>20</sup> public health harms;<sup>21</sup> public safety harms;<sup>22</sup> and impacts to public

19 *deportation’ in U.S. history. Here’s how he might start*, NPR (Nov. 14, 2024),  
20 <https://www.npr.org/2024/11/12/nx-sl-5181962/trump-promises-a-mass-deportation-on-day-1-what-might-that-look-like>.

21 <sup>18</sup> See Licon, *supra* note 16; Forbes Breaking News, *Trump Promises To Use*  
22 *The Alien Enemies Act Of 1798 To Launch Mass Deportation Effort*, YouTube  
(Oct. 26, 2024), <https://www.youtube.com/watch?v=Qug9CnUlYg> (at 0:38).

23 <sup>19</sup> Linthicum, *supra* note 16; Licon, *supra* note 16.

24 <sup>20</sup> *Nat’l Ass’n of Mfrs. v. U.S. Dep’t of Homeland Sec.*, 491 F. Supp. 3d 549,  
25 571 (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  
27 economic sectors.”).

28 <sup>21</sup> *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)  
(concluding that public interest favored injunctive relief “[b]ased on the public  
health and administrative considerations at issue in this case.”).

<sup>22</sup> *City & Cnty. of S.F. v. USCIS*, 981 F.3d 742, 762 (9th Cir. 2020)  
(affirming injunction against DHS’s redefinition of “public charge,” acknowledging  
that the rule would have “adverse effects on the health and welfare of the immigrant  
(continued...)”)



1 services.<sup>23</sup> As discussed below, these and many other cognizable harms will  
2 continue to impact California if preliminary relief is not granted.

3  
4 **I. DEFENDANTS' ACTIONS HAVE INTIMIDATED COMMUNITIES, SCARRED  
CIVIL SOCIETY, AND SHAKEN LOCAL ECONOMIES.**

5 Defendants' actions have harmed local economies, public health, and several  
6 other aspects of daily life. Moreover, although defendants claim to be conducting a  
7 targeted operation aimed at criminals without legal status, they are instead  
8 conducting stops without reasonable suspicion, which in turn has impacted  
9 countless Los Angeles residents regardless of immigration status. *See* TRO at 9-12.

10  
11 **A. Defendants' conduct has wrought harms throughout the Los  
Angeles community.**

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

14 *First*, these actions disrupted the local economy because both workers and  
15 customers, regardless of immigration status, have been afraid to leave their homes.  
16 Restaurants closed and festivals and farmers markets were cancelled.<sup>24</sup> For  
17 example, the Wilmington Farmers Market temporarily shut down, stating: "Due to  
18 increased ICE activity in Wilmington, many of our farmers are scared and have  
19 chosen not to attend... We do hope to one day reopen... but for now, we must step  
20 away."<sup>25</sup> Foot traffic in Artesia's Little India slowed considerably, especially after a  
21 raid at a local car wash.<sup>26</sup> The owner of an Indian clothing store said the pace of

22 as well as general population"); *Earth Island Inst. v. Elliott*, 290 F. Supp. 3d 1102,  
23 1125-26 (E.D. Cal. 2017) (examining public safety implications of proposed  
injunction on Forest Service tree removal project).

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

25 <sup>24</sup> Levi Sumagaysay & Lauren Hepler, *From San Diego to the Bay Area,*  
26 *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/).

27 <sup>25</sup> *Id.*

28 <sup>26</sup> Christina Gonzalez, *ICE raids stir fear in Artesia's Little India and Asian*  
(continued...)



1 business was worse than during the COVID pandemic and that people “are afraid to  
2 be questioned, even if they are here legally.”<sup>27</sup> These and other impacts led the Los  
3 Angeles Chamber of Commerce to issue a statement explaining that “the  
4 Administration’s recent enforcement actions undermine public safety, harm our  
5 communities, and destabilize our economy.”<sup>28</sup>

6 *Second*, Los Angeles residents have been afraid to seek medical treatment.  
7 Hospitals and clinics were on “high alert.”<sup>29</sup> St. John’s Community Health, a  
8 network of community centers across Los Angeles, saw its cancellation rate more  
9 than triple after the raids began.<sup>30</sup> Undocumented parents cancelled appointments  
10 for their U.S. citizen children,<sup>31</sup> and patients were wary of sharing identifying  
11 information with providers.<sup>32</sup> One woman who had regularly attended appointments  
12 for diabetes stopped coming to her community clinic.<sup>33</sup> When staff visited her home  
13 to provide care, they learned she had not left the house for five days; she had  
14 subsisted on tortillas and coffee, and her blood-sugar level was spiking.<sup>34</sup> These  
15 individual accounts are in keeping with studies showing that aggressive

16 \_\_\_\_\_  
17 *communities across LA*, Fox 11 Los Angeles (June 24, 2025),  
18 [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)  
19 [la](https://www.foxla.com/news/ice-raids-impacting-asian-american-communities-in-la).

20 <sup>27</sup> *Id.*

21 <sup>28</sup> L.A. Area Chamber, *L.A. Area Chamber Urges Calm and Calls for De-*  
22 *escalation Amid Immigration Raids* (June 9, 2025), Los Angeles Area Chamber of  
23 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/)  
24 [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/).

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

28 <sup>30</sup> Shreyas Teegala, *Fearing Ice raids, some LA residents skip doctor’s visits:*  
‘Everybody’s life is on pause’, The Guardian (June 24, 2025),  
[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).

<sup>31</sup> 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/)

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

<sup>33</sup> Kreidler, *supra* note 31.

<sup>34</sup> *Id.*

1 enforcement tactics, such as those at issue in this litigation, deter residents from  
2 seeking medical treatment.<sup>35</sup> That deterrence, in turn, impacts the broader health of  
3 the community because “[p]ublic health is served when individuals freely seek  
4 preventive care and do not stave off care until they need emergency room treatment  
5 in the midst of a health crisis.” *Philadelphia v. Sessions*, 280 F. Supp. 3d 579, 609  
6 (E.D. Pa. 2017), *subsequent judgment aff’d in relevant part*, 916 F.3d 276 (3d Cir.  
7 2019).<sup>36</sup>

8 *Third*, defendants’ actions chilled participation in countless other activities of  
9 daily life. The current operation began just as the school year was ending, leading  
10 some families to switch their children to online classes and others to skip  
11 graduation ceremonies.<sup>37</sup> Indeed, it has been repeatedly shown that aggressive  
12 enforcement tactics lead to increased school absences and lower academic  
13 engagement.<sup>38</sup> Hallmarks of summer, such as swim lessons and city-sponsored

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

19 <sup>36</sup> See also, e.g., Cassandra D. Kelly-Cirino et al., *Importance of Diagnostics*  
20 *in Epidemic and Pandemic Preparedness*, 4 BMJ Glob. Health 1, 1, 6-7 (2019);  
21 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*  
22 *and Immigration: An Institutional Interpretation*, 24 Socio. Forum 487, 501-502,  
506 (2009).

23 <sup>37</sup> Andrea Castillo & Queenie Wong, *L.A. Immigration Raids Force the*  
24 *Undocumented to Trade Their Freedom for Safety*, L.A. Times (June 26, 2025),  
25 [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)  
26 [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*  
27 *Decry Immigration Raids as Stoking Fear During Graduation Season*, LAist (June  
28 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)  
[response](https://laist.com/news/education/la-unified-ice-national-guard-response); Kayla Jimenez, *How LA School Graduations Became the Epicenter of*  
*Fear for ICE Family Separations*, USA Today (June 13, 2025, 6:54 PM),  
[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/)  
[ice/84126553007/](https://www.usatoday.com/story/news/politics/2025/06/11/los-angeles-schools-ice/84126553007/).

<sup>38</sup> Carolyn Jones, *‘Afraid to Go to School’: Immigrant Families in Salinas*  
*are Gripped by Fear*, San Gabriel Valley Tribune (Feb. 20, 2025, 2:32 PM),  
<https://tinyurl.com/afraid-to-go-to-school>; Ana Martinez-Donate et al., *Between the*  
(continued...)

1 Fourth of July celebrations, were cancelled.<sup>39</sup> Places of worship also saw steep  
2 declines in attendance.<sup>40</sup> Immigration agents recently detained migrants at two  
3 southern California parishes, and a Pentecostal church in East Los Angeles lost  
4 nearly half of its in-person membership.<sup>41</sup>

5 Locations throughout Los Angeles have been targeted: agents have conducted  
6 stops and arrests at bus stops, car washes, grocery stores, taco trucks, clothing  
7 stores, courthouses, and juice bars.<sup>42</sup> Most recently, masked agents conducted a raid  
8 at a Home Depot in which the agents hid in a rental truck before leaping out and

9  
10 *Lines: A Mixed-Methods Study on the Impacts of Parental Deportation on the  
Health and Well-Being of U.S. Citizen Children*, 9 J. Migration & Health 1, 5, 7  
(2024).

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

13 <sup>40</sup> Anita Snow & Debadrita Sur, *ICE Agents Detain Migrants on Church  
Grounds at 2 California Parishes, Diocese Says*, National Catholic Reports (June  
14 26, 2025), <https://www.ncronline.org/news/ice-agents-detain-migrants-church-grounds-2-california-parishes-diocese-says>.

15 <sup>41</sup> *Id.*; Castillo & Wong, *supra* note 37.

16 <sup>42</sup> Rong-Gong Lin II, *Reports of Immigration Raid at Bus Stop in Pasadena  
Spark Outrage*, L.A. Times (June 19, 2025),

17 <https://www.latimes.com/california/story/2025-06-19/elected-officials-outraged-immigration-raid-pasadena-bus-stop>; Kaitlyn Huamani & Suhauna Hussain, *More*

18 *L.A. Car Washes Targeted in Immigration Raids, Some Closed Amid Fears of  
Further Sweeps*, L.A. Times (June 20, 2025),

19 <https://www.latimes.com/business/story/2025-06-20/la-car-washes-targeted-immigration-raids-business-closures>; Brittney Mejia & Anita Chabria, *At a Troubled  
Fashion Company, Workers Found Community. Then ICE Came*, L.A. Times (July  
20 2, 2025), <https://www.latimes.com/california/story/2025-06-10/los-angeles-ambiance-apparel-workers-ice-raid>; Jonaki Mehta et al., *This Beloved Mexican*

21 *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-business-amid-immigration-raids>; Maanvi Singh, *At Home Depot, ICE Raids*

22 *Terrorize the Workers who Helped Build LA: ‘They Just Come and Grab You’*, The  
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)

23 [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*,  
24 *Eater* (June 18, 2025, 4:00 PM), <https://la.eater.com/restaurant-news/285278/los-angeles-ice-raid-street-food-vendors-taqueritos-taco-stands-trucks-hiding>; Alex

25 *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),

26 <https://www.nbclosangeles.com/news/local/new-surveillance-footage-shows-different-angle-of-mans-arrest-in-pico-rivera/3727793/>; James Queally, *ICE Arrests  
at L.A. Courthouse Met with Alarm: ‘Absolutely Blindsided’*, L.A. Times (June 25,  
27 2025), <https://www.latimes.com/california/story/2025-06-25/ice-arrests-los-angeles-courthouse>.

1 detaining over a dozen individuals.<sup>43</sup> Shortly before the issuance of the TRO,  
2 dozens of armed federal agents, many on horseback, marched through MacArthur  
3 Park for an unspecified “operation” that appeared to be little more than a show of  
4 force.<sup>44</sup> Local leaders condemned the actions, and the president of the Los Angeles  
5 City Council stated: “Stop trying to scare the bejesus out of everybody who lives in  
6 this great city . . . .”<sup>45</sup>

7 In short, the conduct challenged in this litigation has wrought harms  
8 throughout California’s most populous region. The impacts to local economies,  
9 public health, and other core features of civil society counsel in favor of  
10 preliminary relief.

11 **B. Unlawful stops have impacted residents regardless of their**  
12 **immigration status.**

13 The chilling effect of defendants’ conduct is not limited to undocumented  
14 immigrants, and defendants’ tactics have led to the detention of those with legal  
15 status, including citizens.<sup>46</sup> In one incident, masked Border Patrol agents in an  
16 unmarked S.U.V. descended on an autobody shop and reportedly pushed its owner,  
17 plaintiff Jason Brian Gavidia—a United States citizen—against a fence.<sup>47</sup> While

18 <sup>43</sup> Jesus Jiménez & Orlando Mayorquín, *After a Lull, Agents Conduct a Big*  
19 *Immigration Raid in L.A.*, N.Y. Times (Aug. 6, 2025),  
<https://www.nytimes.com/2025/08/06/us/los-angeles-immigration-raid.html>.

20 <sup>44</sup> Jill Cowan & Mimi Dwyer, *Federal Agents March Through L.A. Park,*  
*Spurring Local Outrage*, N.Y. Times (July 7, 2025),  
21 <https://www.nytimes.com/2025/07/07/us/la-macarthur-park-immigration.html>.

22 <sup>45</sup> *Id.*

23 <sup>46</sup> Sam Levin, *ICE Agents Detain US Citizen as LA Immigration Raids*  
*Continue: ‘It’s Racial Profiling,’* The Guardian (June 16, 2025, 6:42 PM),  
[https://www.theguardian.com/us-news/2025/jun/16/los-angeles-immigration-raids-](https://www.theguardian.com/us-news/2025/jun/16/los-angeles-immigration-raids-montebello)  
24 [montebello](https://www.theguardian.com/us-news/2025/jun/16/los-angeles-immigration-raids-montebello); 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),  
25 [https://www.nbcnews.com/news/latino/trump-immigration-raids-citizens-profiling-](https://www.nbcnews.com/news/latino/trump-immigration-raids-citizens-profiling-accusations-native-american-rcna189203)  
[accusations-native-american-rcna189203](https://www.nbcnews.com/news/latino/trump-immigration-raids-citizens-profiling-accusations-native-american-rcna189203); see also L.J. Wolfgang Keppley,  
26 *Mistaken Detainment, Racial Profiling, and Discrimination: How ICE Fails to*  
*Protect Communities*, Niskanen Center (December 14, 2020),  
27 [https://www.niskanencenter.org/mistaken-detainment-racial-profiling-and-](https://www.niskanencenter.org/mistaken-detainment-racial-profiling-and-discrimination-how-ice-fails-to-protect-communities/)  
[discrimination-how-ice-fails-to-protect-communities/](https://www.niskanencenter.org/mistaken-detainment-racial-profiling-and-discrimination-how-ice-fails-to-protect-communities/).

28 <sup>47</sup> Jennifer Medina, *‘I’m an American, Bro!’: Latinos Report Raids in Which*  
(continued...)



1 they twisted his arm, he said “I’m an American, bro!” and in response they  
2 demanded to know what hospital he was born in.<sup>48</sup> He was later released.<sup>49</sup> And  
3 although the operation purportedly targets so-called “criminal aliens,” defendants’  
4 tactics have primarily wrapped in individuals without any criminal history.<sup>50</sup>

5 Given defendants’ enforcement tactics, it is not surprising that a “show me  
6 your papers” regime has emerged.<sup>51</sup> As District Court Judge Jennifer L. Thurston  
7 recently noted before enjoining similar conduct in the Central Valley: “You just  
8 can’t walk up to people with brown skin and say give me your papers.”<sup>52</sup> But that is  
9 precisely what defendants have done in Los Angeles. *See* TRO at 9-11. As a result,  
10 some people now carry passports to run routine errands.<sup>53</sup> Tony Marquez, a retired  
11 Verizon worker born in San Diego, began taking his driver’s license with him on  
12 neighborhood walks.<sup>54</sup> He told the New York Times: “I’m a boring senior that lives  
13 in Boyle Heights that likes to go for walks, and for the first time in history, I don’t  
14 feel safe.”<sup>55</sup>

15  
16  
17 *U.S. Citizenship Is Questioned*, N.Y. Times (June 15, 2025),  
18 [https://www.nytimes.com/2025/06/15/us/hispanic-americans-raids-](https://www.nytimes.com/2025/06/15/us/hispanic-americans-raids-citizenship.html?partner=slack&smid=sl-share)  
[citizenship.html?partner=slack&smid=sl-share](https://www.nytimes.com/2025/06/15/us/hispanic-americans-raids-citizenship.html?partner=slack&smid=sl-share).

19 <sup>48</sup> *Id.*

<sup>49</sup> *Id.*

20 <sup>50</sup> 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),  
21 [https://www.latimes.com/california/story/2025-06-24/detention-centers-swell-with-](https://www.latimes.com/california/story/2025-06-24/detention-centers-swell-with-immigrants-with-no-criminal-record)  
[immigrants-with-no-criminal-record](https://www.latimes.com/california/story/2025-06-24/detention-centers-swell-with-immigrants-with-no-criminal-record); Bernd Debusmann Jr., *Who Has Been*  
22 *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).

23 <sup>51</sup> *See, e.g.,* Sergio Olmos et al., *Taken: What Happens After an LA*  
*Immigration Raid*, CalMatters (June 28, 2025),  
24 <https://calmatters.org/investigation/2025/06/taken-la-immigration-raids/>.

25 <sup>52</sup> 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),  
26 <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).

27 <sup>53</sup> Jesus Jiménez et al., *supra* note 39.

28 <sup>54</sup> *Id.*

<sup>55</sup> *Id.*

1 Ultimately, defendants turned the thriving, diverse community of Los Angeles  
2 into a community residing in fear. The predictable impacts were far-reaching and  
3 counsel in favor of a preliminary injunction.

4  
5 **II. DEFENDANTS' TACTICS HAVE SOWN DISTRUST AND CONFUSION THAT**  
6 **IMPEDES LOCAL LAW ENFORCEMENT.**

7 The authority and duty to enforce criminal codes is integral to state  
8 sovereignty. *See, e.g., Alfred L. Snapp & Son, Inc. v. P.R. ex rel. Barez*, 458 U.S.  
9 592, 601 (1982). But defendants' tactics have caused widespread confusion, delays,  
10 and danger for both local law enforcement and the community it protects.  
11 Immigration agents' efforts to hide their identifies and affiliations—via ski masks,  
12 dark sunglasses, plainclothes, and unmarked vehicles—and refusal to identify  
13 themselves have made it difficult to distinguish them from criminals. For example,  
14 the Pasadena Police Department had to investigate reports of a man stepping out of  
15 an unmarked car, pointing a firearm at a group of pedestrians, then speeding off  
16 after activating red and blue emergency lights.<sup>56</sup> The police later determined “to the  
17 best of [their] estimation he was an ICE agent.”<sup>57</sup> Local law enforcement has also  
18 responded to reports of kidnappings and hit-and-run incidents, only to later  
19 determine that the incidents were part of ICE operations.<sup>58</sup> The frequency of such  
20 incidents prompted Pasadena's mayor to note: “One question [is,] is this a law  
21 enforcement agent or someone pretending to be a law enforcement agent, and there  
22  
23

24 <sup>56</sup> Nathan Solis & Richard Winton, ‘Who Are These People?’ Masked  
25 Immigration Agents Challenge Local Police, Sow Fear in L.A., L.A. Times (June  
26 24, 2025, 6:00 AM), <https://www.latimes.com/california/story/2025-06-24/masked-immigration-agents-local-law-enforcement-tension>.

27 <sup>57</sup> *Id.*  
28 <sup>58</sup> Alex Stone, *Los Angeles Police Responded to a Kidnapping Call. But 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>.

1 is no good answer here.”<sup>59</sup> Indeed, there have been several recent arrests of  
2 civilians impersonating ICE officers to commit crimes.<sup>60</sup>

3 Defendants’ conduct has also eroded trust between local law enforcement and  
4 the community it protects. Those without legal status are already less likely to  
5 report crime—even crimes in which they themselves are victims—out of “fear that  
6 [officials] will ask . . . about [their] immigration status.”<sup>61</sup> Fear of removal, or of  
7 having a family or community member removed, makes victims and witnesses  
8 reluctant to come forward, to testify in court, and even to seek safety in a domestic  
9 violence shelter.<sup>62</sup> Recent arrests outside Los Angeles courthouses have  
10 exacerbated these fears, and led the Presiding Judge of the Los Angeles Superior  
11 Court to state: “These actions create a chilling effect, silencing victims, deterring  
12 witnesses, discouraging community members from seeking protection and deterring  
13 parties from being held accountable for their crimes or participating in legal  
14 proceedings critical to the rule of law.”<sup>63</sup>

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17 <sup>59</sup> Solis & Winton, *supra* note 56.

18 <sup>60</sup> Jose Olivares, *US Sees Spate of Arrests of Civilians Impersonating ICE*  
19 *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)  
20 [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  
21 introduced in the California legislature to prohibit, with certain exceptions, all law  
22 enforcement officers from using face coverings and/or require more visible forms  
23 of identification. See Office of Senator Scott Wiener, *Senators Wiener & Arreguin*  
24 *Announce Legislation To Prohibit Local, State & Federal Law Enforcement From*  
25 *Covering Their Faces & Require Stronger Identification*, Press Release (June 16,  
26 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)  
27 [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  
28 Pérez, *Senator Pérez and Community Leaders Announce Bill to Establish Clear*  
*Identification Requirements for Individuals Acting Under Law Enforcement*  
*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).

25 <sup>61</sup> See, e.g., Nik Theodore, *Insecure Communities: Latino Perceptions of*  
26 *Police Involvement in Immigration Enforcement*, Dep’t of Urb. Plan. & Pol’y,  
27 Univ. of Ill. at Chi. 1, 6 (2013), <https://tinyurl.com/Insecure-Communities>.

27 <sup>62</sup> James Queally, *Fearing Deportation, Many Domestic Violence Victims Are*  
28 *Steering Clear of Police and Courts*, L.A. Times (Oct. 9, 2017),  
<https://tinyurl.com/Undocumented-Crime-Reporting>.

<sup>63</sup> James Queally, *supra* note 42.



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

4 **CONCLUSIONS**

5 For the foregoing reasons, the public interest counsels in favor of preliminary  
6 relief, and the plaintiffs' motion for a preliminary injunction should be granted.

7  
8 Dated: August 19, 2025

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**CERTIFICATE OF COMPLIANCE**

The undersigned, counsel of record for Amici States, certifies that this brief contains 4,282 words, which complies with the word limit of Local Rule 11-6.1.

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