No. 26-1214

IN THE UNITED STATES COURT OF APPEALS
FOR THE TENTH CIRCUIT

UNITED STATES OF AMERICA,

Plaintiff-Appellant,

v.

STATE OF COLORADO, et al.,

Defendants-Appellees.

BRIEF OF *AMICI CURIAE* ONE HUNDRED AND FOURTY-ONE CITIES, COUNTIES, AND ELECTED OFFICIALS IN SUPPORT OF APPELLEES

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Chicago v. Sessions,
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Gonzales v. Oregon,
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Hillsborough Cnty. v. Automated Med. Labs., Inc.,
471 U.S. 707 (1985) 1

Medtronic, Inc. v. Lohr,
518 U.S. 470 (1996) 2

Murphy v. Nat'l Collegiate Athletic Ass'n,
584 U.S. 453 (2018) 22

Ocean v. Grewal,
475 F. Supp. 3d 355 (D.N.J. 2020) 22, 23

Philadelphia v. Sessions,
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Philadelphia v. United States,
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San Francisco v. Barr,
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San Francisco v. Garland,
42 F.4th 1078 (9th Cir. 2022) 23

Steinle v. San Francisco,
919 F.3d 1154 (9th Cir. 2019) 23

United States v. California,
314 F. Supp. 3d 1077 (E.D. Cal. 2018) 23

United States v. California,
921 F.3d 865 (9th Cir. 2019) 23

United States v. Cnty. of Washtenaw,
No. 26-11166, 2026 WL 2453724 (E.D. Mich. Aug. 21, 2026) 3

United States v. Illinois,
No. 25-CV-1285, 2025 WL 2098688 (N.D. Ill. July 25, 2025) 22, 23

United States v. New Jersey,
No. 20-1364, 2021 WL 252270 (D.N.J. Jan. 26, 2021) 23

United States v. New York,
No. 25 Civ. 744, 2025 WL 3205011 (N.D.N.Y. Nov. 17, 2025) 22

OTHER AUTHORITIES

Allison McCord Stafford et al., *Documentation Status and Self-Rated Physical Health Among Latinx Young Adult Immigrants: The Mediating Roles of Immigration and Healthcare Stress*, 10 J. Racial & Ethnic Health Disparities 761 (2023) 17

Amanda Seitz & Jacquelyn Martin, *As Trump's Raids Ramp Up, a Texas Region's Residents Stay Inside - Even When They Need Medical Care*, AP News (July 21, 2025) 19

Balancing Community Trust and Enforcement: The Complex Issue of Immigration, Police Executive Research Forum (Apr. 12, 2025) 11

Ben Zipperer, *Trump's Deportation Agenda Will Destroy Millions of Jobs*, Econ. Pol'y Inst. (July 10, 2025) 16

Braden Ross, *La Vergne Police Chief Urges Community to Use Emergency Services Despite Fears of Immigration Enforcement*, WSMV4 (May 22, 2025) 11

Carl Davis, Marco Guzman & Emma Sifre, *Tax Payments by Undocumented Immigrants*, Inst. on Tax'n Payment & Econ. Pol'y (July 30, 2024) 15

Carter Evans, *Trump's Immigration Crackdown Causing Labor Shortages to California's Construction Industry, Builder Says: "They're hiding,"* CBS News (July 18, 2025) 16

Charis E. Kubrin & Bradley J. Bartos, *Sanctuary Status and Crime in California: What's the Connection?*, 3 Just. Evaluation J. 115 (2020) 5

Charles Wellford & James Cronin, *Clearing Up Homicide Clearance Rates,* 181728 Nat'l Inst. Just. J. 2 (2000) 6

Christian Gunadi, *On the Association between Undocumented Immigration and Crime in the United States*, 73 Oxford Econ. Papers 200 (2021) 4

Dale T. Manning & Jesse Burkhardt, *The Local Effects of Federal Law Enforcement Policies: Evidence from Sanctuary Jurisdictions and Crime*, 40 Contemp. Econ. Pol'y 423 (2022) 5, 6

David K. Hausman, *Sanctuary Policies Reduce Deportations without Increasing Crime*, 117 PNAS 27262, 27262 (2020) 5

Deborah Baskin & Ira Sommers, *The Influence of Forensic Evidence on the Case Outcomes of Assault and Robbery Incidents*, 23 Crim. Just. Pol'y Rev. (2012) 6

Dkt. 76, Declaration of Support for Preliminary Injunction, *San Francisco v. Trump*, No. 25-CV-0135 (N.D. Cal. Mar. 17, 2025) 21

Emily Baumgaertner Nunn et al., *Migrants Are Skipping Medical Care, Fearing ICE, Doctors Say*, N.Y. Times (May 8, 2025) 18

Felipe M. Gonçalves, Elisa Jácome & Emily K. Weisburst, *Immigration Enforcement and Public Safety* (Nat'l Bureau of Econ. Rsch., Working Paper No. 32109, 2024) 8

Hannah Rappleye et al., *Immigration Crackdown Makes Women Afraid to Testify Against Abusers, Experts Warn*, NBC News (Sept. 22, 2018) 9

Helen B. Marrow, *The Power of Local Autonomy: Expanding Health Care to Unauthorized Immigrants in San Francisco*, 35 Ethnic & Racial Stud. 72 (2012) 20

Here's What We Know about Foreign-Born Workers, and How They Compare to the Native-Born Population, Peterson G. Found. (last visited Aug. 20, 2025) 13

Immigrant Entrepreneurship in the US, Nat'l Bureau of Econ. Rsch. (Oct. 21, 2024) 14

Jacqueline M. Torres et al., *Deportation Worry, Cardiovascular Disease Risk Factor Trajectories, and Incident Hypertension: A Community-Based Cohort Study*, 8 J. Am. Heart Ass'n 1 (2019) 17

Jan Hoffman, *Sick and Afraid, Some Immigrants Forgo Medical Care*, N.Y. Times (June 26, 2017) 20

Jill Theresa Messing et al., *Latinas' Perceptions of Law Enforcement: Fear of Deportation, Crime Reporting, and Trust in the System*, 30 J. Women & Soc. Work 328 (2015) 8

Julia Gelatt, Jeanne Batalova & Randy Capps, *Navigating the Future of Work: The Role of*

Immigrant-Origin Workers in the Changing U.S. Economy, Migration Pol'y Inst. (Oct. 2020) 13

Karen Hacker et al., *The Impact of Immigration and Customs Enforcement on Immigrant Health: Perceptions of Immigrants in Everett, Massachusetts, USA*, 73 Soc. Sci. & Med. 586 (2011) 18

Karla M. Sanford, *Undocumented Workers Power L.A.'s Restaurants. Will the Industry Protect Them?*, L.A. Times (June 30, 2025) 16

Kathleen M. Roche et al., *Impacts of Immigration Actions and News and the Psychological Distress of U.S. Latino Parents Raising Adolescents*, 62 J. Adolesc. Health 525 (2018) 10

Kristina Murphy, Lyn Hinds & Jenny Fleming, *Encouraging Public Cooperation and Support for Police*, 18 Policing & Soc'y 136 (2008) 6

Marta Ascherio, *Do Sanctuary Policies Increase Crime? Contrary Evidence from a County-Level Investigation in the United States*, 106 Soc. Sci. Rsch. 102743 (2022) 5

Michael T. Light, Jingying He & Jason P. Robey, *Comparing Crime Rates between Undocumented Immigrants, Legal Immigrants, and Native-Born US Citizens in Texas*, 117 PNAS 32340 (2020) 4

Nathaniel Meyersohn & Vanessa Yurkevich, *America's Migrant Workers Are Terrified to Work But Unable to Stay Home*, CNN (June 14, 2025) 16

National Latino Family Report 2025, AP-OD (last visited Aug. 20, 2025) 10

New American Fortune 500 in 2024, Am. Immigr. Council (Sept. 9, 2024) 14

Patricia A. Cavazos-Rehg et al., *Legal Status, Emotional Well-Being and Subjective Health Status of Latino Immigrants*, 99 J. Nat'l Med. Ass'n 1126 (2007) 18

Paul H. Robinson, Jeffrey Seaman & Muhammad Sarahne, *Standing Back and Standing Down: Citizen Non-Cooperation and Police Non-Intervention as Causes of Justice Failures and Crime*, 51 Hofstra L. Rev. 923 (2023) 6

Public Health Talking Points for Immigration Justice, Health In Partnership (last visited Aug. 20, 2025) 19

Radha Vishnuvajjala, *Insecure Communities: How an Immigration Enforcement Program Encourages Battered Women to Stay Silent*, 32 Boston College J. Law & Soc. Just. 185 (2012) 8

Ran Abramitzky et al., *Law-Abiding Immigrants: The Incarceration Gap Between Immigrants and the US-Born, 1870–2020,* Nat'l Bureau of Econ. Rsch., Working Paper No. 31440 (2023) 4

Ricardo D. Martínez-Schuldt & Daniel E. Martínez, *Immigrant Sanctuary Policies and Crime-Reporting Behavior: A Multilevel Analysis of Reports of Crime Victimization to Law Enforcement, 1980 to 2004*, 86 Am. Sociol. Rev. 154 (2021) 9

Ricardo D. Martínez-Schuldt & Daniel E. Martínez, *Sanctuary Policies and City-Level Incidents of Violence, 1990 to 2010*, 36 Just. Q. 567 (2019) 5

Robert C. Davis et al., *Working Smarter on Cold Cases: Identifying Factors Associated with Successful Cold Case Investigations*, 59 J. Forensic Sci. 375 (2014) 6

Robert Lynch & Michael Ettlinger, *The Economic Impact on Citizens and Authorized Immigrants of*

Mass Deportation, Univ. N.H. Carsey Sch. Pub. Pol'y (Aug. 29, 2024) 13

Ryan Edwards & Francesc Ortega, *The Economic Contribution of Unauthorized Workers: An Industry Analysis*, Nat'l Bureau of Econ. Rsch., Working Paper No. 22834 (2016) 15

Steven Asch, Barbara Leake & Lillian Gelberg, *Does Fear of Immigration Authorities Deter Tuberculosis Patients From Seeking Care?*, 161 West J. Med. 373 (1994) 20

Study Finds Trump's Election Was Associated With Decrease in Well-Child Visits for Children of Immigrant Mothers, Boston University (Sept. 8, 2023) 19

Thomas J. Miles & Adam B. Cox, *Does Immigration Enforcement Reduce Crime? Evidence from Secure Communities*, 57 J.L. & Econ. 937 (2014) 4

Tom K. Wong et al., *How Interior Immigration Enforcement Affects Trust in Law Enforcement*, 19 Persp. on Pol. 357 (2021) 7

Tom K. Wong, *The Effect of Sanctuary Policies on Crime and the Economy*, Ctr. for Am. Progress (Jan. 26, 2017) 12

U.S. Immigration Statistics, Am. Immigr. Council (last visited Aug. 20, 2025) 14, 15

INTEREST OF AMICI

State and local jurisdictions like Amici bear primary responsibility for ensuring the safety and well-being of their residents and communities.[1] This principle is neither novel nor controversial; indeed, it lies at the core of our federalist system of government. *See, e.g., Hillsborough Cnty. v. Automated Med. Labs., Inc.*, 471 U.S. 707, 719 (1985) (Residents' health and safety are "primarily, and historically, a matter of local concern."). In exercising that sovereign duty to promote public safety, local governments—including Amici, which comprise 141 cities, counties, and elected officials from across the United States—have adopted laws and policies reflecting their careful judgment of what practices best serve their communities.

In this litigation and in other litigation across the country, the federal government seeks to upset that well-established principle, attacking local policies that limit the entanglement of local law enforcement with federal immigration officers. Colorado's and Denver's

[1] All parties have consented to the filing of this amicus brief. Pursuant to Federal Rule of Appellate Procedure 29, amici state that no counsel for a party authored this brief in whole or in part and no person or entity, other than amici or their counsel, has funded its preparation or submission.

challenged policies manifest a commitment to integrating immigrants into the community and promoting public safety, public health, and a robust economy. Amici share Colorado and Denver's goal of protecting the well-being of all residents and offer a critical perspective on how policies like those challenged in this case do just that.

ARGUMENT

The authority of local governments to make their own policy decisions about the health and safety of their communities is a fundamental feature of our constitutional system. *Gonzales v. Oregon*, 546 U.S. 243, 270 (2006) (quoting *Medtronic, Inc. v. Lohr*, 518 U.S. 470, 475 (1996)) ("[The] structure and limitations of federalism . . . allow the States 'great latitude under their police powers to legislate as to the protection of the lives, limbs, health, comfort, and quiet of all persons.'"). As Amici well know, Colorado's and Denver's decisions to adopt policies limiting entanglement with federal immigration enforcement are not only authorized as a matter of constitutional design; they are also good policy. Extensive research shows that jurisdictions adopting policies similar to those in Colorado and Denver—in which scarce local law enforcement resources are allocated to the investigation of crimes, and state and local activities are disentangled from enforcement of federal

civil immigration laws—have safer, healthier, and more economically resilient communities. This extensive research, as one federal court has explained, illustrates why many jurisdictions "may rationally forego cooperation with the sort of mass deportation efforts and masked capture that ICE has chosen to partake in." *United States v. Cnty. of Washtenaw*, No. 26-11166, 2026 WL 2453724, at *12 (E.D. Mich. Aug. 21, 2026).

I. So-Called Sanctuary Policies[2] Promote Public Safety.

As an initial matter, the Trump Administration's repeated attempts to characterize immigrant communities as threats to public

[2] Jurisdictions with policies like Colorado's and Denver's adopt or are labeled with a variety of descriptors, including "sanctuary cities" and "welcoming jurisdictions." Although the Trump Administration has adopted the term "sanctuary cities" to characterize such places that enact laws to prioritize local resources for local purposes, it has not offered a specific definition of the term. Indeed, "localities which have concluded that cooperation in federal civil immigration efforts is counterproductive or simply offensive are often labeled 'sanctuary' cities or states, but that term is commonly misunderstood." *Chicago v. Sessions*, 888 F.3d 272, 281 (7th Cir. 2018). The term is a misnomer because such jurisdictions "do[] not interfere in any way with the federal government's lawful pursuit of its civil immigration activities, and presence in such localities will not immunize anyone to the reach of the federal government." *Id.* Given the common usage of the term, however, this brief uses the phrases "so-called sanctuary jurisdictions" and "so-called sanctuary policies" to refer to those jurisdictions and policies that seek to limit the entanglement of local law enforcement with federal immigration efforts.

safety are simply unsupported by the evidence. In fact, immigrant communities are statistically *less likely to commit crime* than U.S.-born citizens. Specifically, U.S.-born citizens are twice as likely as undocumented immigrants to be arrested for violent crimes[3] and four times as likely to be arrested for property crimes.[4] They are also significantly more likely to be incarcerated than immigrants, documented or not.[5] It is thus unsurprising that increasing removals does not lower crime rates.[6]

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[3] Michael T. Light, Jingying He & Jason P. Robey, *Comparing Crime Rates between Undocumented Immigrants, Legal Immigrants, and Native-Born US Citizens in Texas*, 117 PNAS 32340, 32340 (2020), https://www.pnas.org/doi/full/10.1073/pnas.2014704117.

[4] *Id.*

[5] Ran Abramitzky et al., *Law-Abiding Immigrants: The Incarceration Gap Between Immigrants and the US-Born, 1870–2020* (Nat'l Bureau of Econ. Rsch., Working Paper No. 31440, 2023), https://www.nber.org/papers/w31440; Christian Gunadi, *On the Association between Undocumented Immigration and Crime in the United States*, 73 Oxford Econ. Papers 200, 209 (2021), https://academic.oup.com/oep/article/73/1/200/5572162.

[6] Thomas J. Miles & Adam B. Cox, *Does Immigration Enforcement Reduce Crime? Evidence from Secure Communities*, 57 J.L. & Econ. 937, 937 (2014), https://www.journals.uchicago.edu/doi/10.1086/680935 (finding that research on the implementation of one federal program that significantly increased the apprehension and removal of undocumented immigrants showed that increased enforcement had "no observable effect on the overall crime rate").

In any event, and as many Amici have explained in litigation across the country, so-called sanctuary policies, like those challenged here, make communities safer. Any argument to the contrary is belied by extensive social science research amassed over the past several decades, which confirms that such policies either have no statistical effect on crime rates[7] or result in *lower* crime rates[8]—particularly for violent crimes like robbery, assault, and homicide.[9] Indeed, according to one estimate, because sanctuary policies decrease violent crime, non-sanctuary jurisdictions across the country could reduce crime-related costs by $3.28

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[7] David K. Hausman, *Sanctuary Policies Reduce Deportations without Increasing Crime*, 117 PNAS 27262, 27262 (2020), https://pnas.org/doi/full/10.1073/pnas.2014673117; Charis E. Kubrin & Bradley J. Bartos, *Sanctuary Status and Crime in California: What's the Connection?*, 3 Just. Evaluation J. 115, 115 (2020), https://www.tandfonline.com/doi/full/10.1080/24751979.2020.1745662.

[8] Marta Ascherio, *Do Sanctuary Policies Increase Crime? Contrary Evidence from a County-Level Investigation in the United States*, 106 Soc. Sci. Rsch. 102743, 102743 (2022), https://www.sciencedirect.com/science/article/abs/pii/S0049089X22000497.

[9] Dale T. Manning & Jesse Burkhardt, *The Local Effects of Federal Law Enforcement Policies: Evidence from Sanctuary Jurisdictions and Crime*, 40 Contemp. Econ. Pol'y 423, 423 (2022), https://onlinelibrary.wiley.com/doi/abs/10.1111/coep.12564; Ricardo D. Martínez-Schuldt & Daniel E. Martínez, *Sanctuary Policies and City-Level Incidents of Violence, 1990 to 2010*, 36 Just. Q. 567, 567 (2019), https://www.tandfonline.com/doi/abs/10.1080/07418825.2017.1400577.

billion per year if they adopted such policies.[10] In part, that is because one of the most important factors in a crime being "cleared," or solved, is the willingness of witnesses to share information with the police.[11] Local law enforcement thus relies on building trust with the communities they protect—a foundational principle of community policing that encourages cooperation with law enforcement.[12] Policies that make it more difficult for the police to maintain the trust of all community members, including immigrant populations, increase the likelihood that crimes go unreported, unsolved, or unprosecuted.

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[10] Manning & Burkhardt, *supra* n.9.

[11] Deborah Baskin & Ira Sommers, *The Influence of Forensic Evidence on the Case Outcomes of Assault and Robbery Incidents*, 23 Crim. Just. Pol'y Rev. 186, 203 (2012), https://journals.sagepub.com/doi/10.1177/0887403410395576; Robert C. Davis et al., *Working Smarter on Cold Cases: Identifying Factors Associated with Successful Cold Case Investigations*, 59 J. Forensic Sci. 375, 378 (2014), https://onlinelibrary.wiley.com/doi/10.1111/1556-4029.12384; Charles Wellford & James Cronin, *Clearing Up Homicide Clearance Rates,* 181728 Nat'l Inst. Just. J. 2, 4 (2000), https://nij.ojp.gov/library/publications/clearing-homicide-clearance-rates; Paul H. Robinson, Jeffrey Seaman & Muhammad Sarahne, *Standing Back and Standing Down: Citizen Non-Cooperation and Police Non-Intervention as Causes of Justice Failures and Crime*, 51 Hofstra L. Rev. 923, 926 (2023).

[12] Kristina Murphy, Lyn Hinds & Jenny Fleming, *Encouraging Public Cooperation and Support for Police*, 18 Policing & Soc'y 136, 136 (2008), http://www.tandfonline.com/doi/abs/10.1080/10439460802008660.

Indeed, extensive studies show that immigrants who fear removal for themselves or members of their communities are less likely to cooperate with local law enforcement. For example, a 2021 survey found that, in jurisdictions where local police coordinate with the federal government to enforce federal immigration laws, undocumented immigrants are less likely to trust that law enforcement will keep them or their communities safe; less likely to believe law enforcement will protect witness confidentiality; and less likely to think law enforcement will protect the rights of all people equally, even those who are undocumented.[13]

And the problem is not just a generalized skepticism about police. Rather, that skepticism manifests itself in ways that make entire communities less safe: through decreased reporting of crime and decreased cooperation from victims and witnesses with law enforcement during their investigation and prosecution of crime. For example, one study found that increased information sharing between local police and

[13] Tom K. Wong et al., *How Interior Immigration Enforcement Affects Trust in Law Enforcement*, 19 Persp. on Pol. 357, 357 (2021), https://www.cambridge.org/core/product/identifier/S1537592719003943/type/journal_article.

federal immigration authorities reduced Hispanics' crime reporting rate by 30 percent and increased their crime victimization rate by 16 percent.[14] Similarly, a nationwide survey of Latinas found that, regardless of immigration status, respondents who reported a greater fear of removal for themselves, a family member, or a close friend were less likely to report being a victim of a violent crime to the police.[15] Other studies show that undocumented victims of domestic violence, most of whom are women, are less likely to report abuse to authorities than documented or non-immigrant women because of fear of immigration consequences, among other reasons.[16] And beyond decreased reporting,

[14] Felipe M. Gonçalves, Elisa Jácome & Emily K. Weisburst, *Immigration Enforcement and Public Safety* (Nat'l Bureau of Econ. Rsch., Working Paper No. 32109, 2024), https://www.nber.org/papers/w32109.

[15] Jill Theresa Messing et al., *Latinas' Perceptions of Law Enforcement: Fear of Deportation, Crime Reporting, and Trust in the System*, 30 J. Women & Soc. Work 328, 334 (2015), https://journals.sagepub.com/doi/10.1177/0886109915576520.

[16] Radha Vishnuvajjala, *Insecure Communities: How an Immigration Enforcement Program Encourages Battered Women to Stay Silent*, 32 Boston College J. Law & Soc. Just. 185, 186–187 (2012).

law enforcement officers themselves have reported that fear of removal interferes with victim cooperation in prosecutions.[17]

Many Amici communities have adopted policies, like those challenged here, in furtherance of what the evidence overwhelmingly shows: that decreased fear of immigration enforcement in local communities by local law enforcement increases public safety overall. Indeed, a longitudinal study examining crime reporting trends from 1980 to 2004 found that Latino victims of violent crimes were 23 percent more likely to come forward and seek police assistance after their jurisdiction adopted a so-called sanctuary policy.[18]

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[17] *See* Hannah Rappleye et al., *Immigration Crackdown Makes Women Afraid to Testify Against Abusers, Experts Warn*, NBC News (Sept. 22, 2018), https://www.nbcnews.com/politics/immigration/immigration-crackdown-makeswomen-afraid-testify-against-abusers-experts-warn-n908271 ("Since President Trump's inauguration, [Denver City Attorney Kristin Bronson] said, she's had to drop 30 cases of domestic violence because the victims were too afraid of deportation to cooperate and appear in court.").

[18] Ricardo D. Martínez-Schuldt & Daniel E. Martínez, *Immigrant Sanctuary Policies and Crime-Reporting Behavior: A Multilevel Analysis of Reports of Crime Victimization to Law Enforcement, 1980 to 2004*, 86 Am. Sociol. Rev. 154, 170 (2021), https://journals.sagepub.com/doi/10.1177/0003122420978406 (calculation drawn from figures in Table 4).

The federal government seeks to undermine those efforts through its immigration enforcement policies and harmful rhetoric, which directly deter immigrants from cooperating with or seeking help from local law enforcement. In fact, in a survey conducted to assess sentiment among the Latino community last year, 35 percent of Latino parent-respondents said they might avoid reporting a crime to the police.[19] That mirrors a similar survey, conducted in 2017 (the first year of the first Trump Administration), in which almost 30 percent of participants (members of Latino immigrant communities) said they "very often" or "always" avoided contact with police; 39.4 percent avoided medical care, police, and services; and 47.6 percent warned their children to stay away from authorities.[20]

State and local law enforcement agencies are also concerned. For example, in May 2025 in La Vergne, Tennessee, a six-month-old baby died after being found unresponsive where the baby's caretaker reported

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[19] *National Latino Family Report 2025*, AP-OD, https://nationalsurvey.ap-od.org/2025-report/ (last visited Aug. 20, 2025).

[20] Kathleen M. Roche et al., *Impacts of Immigration Actions and News and the Psychological Distress of U.S. Latino Parents Raising Adolescents*, 62 J. Adolesc. Health 525, 529 (2018), https://pubmed.ncbi.nlm.nih.gov/29503033/.

being afraid to call 911 due to his immigration status.[21] The police chief, addressing a community town hall, acknowledged that "there are communities in La Vergne that are losing trust in law enforcement in this country right now, and it's going to make our job very difficult."[22] These concerns were echoed in an April 2025 report detailing the experiences of five police leaders facing difficulty maintaining the trust of immigrant communities amid increased ICE activity—trust the report described as "essential to learning about crimes in their jurisdictions and to identifying and apprehending offenders."[23]

At bottom, policies like those challenged here make communities safer. They are grounded not in extremist rhetoric, but in evidence-based and rational decision-making and are eminently within the domain of the

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[21] Braden Ross, *La Vergne Police Chief Urges Community to Use Emergency Services Despite Fears of Immigration Enforcement*, WSMV4 (May 22, 2025), https://www.wsmv.com/2025/05/22/la-vergne-police-chief-urges-community-use-emergency-services-despite-fears-immigration-enforcement/.

[22] *Id.*

[23] *Balancing Community Trust and Enforcement: The Complex Issue of Immigration*, Police Executive Research Forum (Apr. 12, 2025), https://www.policeforum.org/index.php?option=com_content&view=article&id=1331:trending12apr25&catid=20:site-content.

police power maintained by State and local governments, including many Amici communities.

II. So-Called Sanctuary Policies Promote Economic Well-Being.

So-called sanctuary policies are not only essential for advancing public safety—they also preserve scarce local resources and promote vibrant local economies. That is because "[w]hen local law enforcement focuses on keeping communities safe, rather than becoming entangled in federal immigration enforcement efforts, . . . community members stay more engaged in the local economy."[24] According to one study, cities and municipalities that adopt policies like those challenged in this case have higher median household incomes, less poverty, and less reliance on public assistance.[25] They also have higher labor force participation, higher employment-to-population ratios, and lower unemployment.[26] The study found that, on average, median household income is $4,353 higher

[24] Tom K. Wong, *The Effect of Sanctuary Policies on Crime and the Economy*, Ctr. for Am. Progress (Jan. 26, 2017), https://www.americanprogress.org/article/the-effects-of-sanctuary-policies-on-crime-and-the-economy/.

[25] *Id.*

[26] *Id.*

in counties with so-called sanctuary policies than in counties without such policies.[27]

It should come as no surprise that communities with strong immigrant presence have healthy economies, given that immigrants are key contributors to the labor force across sectors. For one thing, immigrants are statistically more likely to work than native residents.[28] Indeed, one report found that between 2010 and 2018, immigrants and their U.S.-born children represented 83 percent of workforce growth.[29] The report projected that through 2035, all new growth in the working-age population of the U.S. would come from immigrants and their

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[27] *Id.*; *see also* Robert Lynch & Michael Ettlinger, *The Economic Impact on Citizens and Authorized Immigrants of Mass Deportation*, Univ. N.H. Carsey Sch. Pub. Pol'y (Aug. 29, 2024), https://carsey.unh.edu/sites/default/files/media/2024-08/economic-impact-mass-deportation-lit-review.pdf (finding that large-scale removals lead to reduced GDP and employment, and to lower wages for citizens and authorized-immigrant workers).

[28] *Here's What We Know about Foreign-Born Workers, and How They Compare to the Native-Born Population*, Peterson G. Found., https://www.pgpf.org/article/the-foreign-born-labor-force-of-the-united-states/ (last visited Aug. 20, 2025).

[29] Julia Gelatt, Jeanne Batalova & Randy Capps, *Navigating the Future of Work: The Role of Immigrant-Origin Workers in the Changing U.S. Economy*, Migration Pol'y Inst., 1 (Oct. 2020), https://www.migrationpolicy.org/research/future-work-immigrant-origin-workers-us-economy.

children.[30] Immigrants also start businesses at far higher rates than the U.S. population overall.[31] In 2023, there were over 3.8 million immigrant entrepreneurs, generating $116.2 billion in business income and creating millions of jobs.[32] A 2024 American Immigration Council report found that a stunning 46 percent of Fortune 500 companies were founded by immigrants or the children of immigrants.[33]

Despite widespread narratives that immigrants are a burden on U.S. taxpayers, immigrants generate tax revenue, exercise immense spending power, and help build housing wealth. In 2023, immigrant tax contributions amounted to more than $650 billion, and the collective spending power of immigrant households was $1.7 trillion.[34] Even undocumented immigrants generate tax revenue—indeed, often more

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[30] *Id.*

[31] *Immigrant Entrepreneurship in the US*, Nat'l Bureau of Econ. Rsch. (Oct. 21, 2024), https://www.nber.org/be/20242/immigrant-entrepreneurship-us.

[32] *U.S. Immigration Statistics*, Am. Immigr. Council, https://map.americanimmigrationcouncil.org/

locations/national/ (last visited Aug. 20, 2025).

[33] *New American Fortune 500 in 2024*, Am. Immigr. Council (Sept. 9, 2024), https://www.americanimmigrationcouncil.org/report/new-american-fortune-500-2024/.

[34] *U.S. Immigration Statistics*, *supra* n.32.

than similarly situated U.S. citizens—funding programs like Social Security and Medicare that they themselves are barred from accessing.[35] An analysis by the National Bureau of Economic Research estimated that unauthorized workers contribute three percent of private sector GDP annually, which amounts to close to $5 trillion over a 10-year period.[36] Immigrants also build housing wealth, often moving into neighborhoods in decline and restoring them, thereby raising property values and making them more attractive to other U.S. residents.[37]

But when immigrants and their families fear indiscriminate immigration enforcement, it is more difficult for them to participate fully in the economy. Recent targeting of work sites by ICE illustrates the problem, showing how heightened fear of enforcement can disrupt local economies. A CNN story in June 2025 reported on a meat production plant that was left operating at 30 percent capacity after an immigration

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[35] Carl Davis, Marco Guzman & Emma Sifre, *Tax Payments by Undocumented Immigrants*, Inst. on Tax'n Payment & Econ. Pol'y, 3 (July 30, 2024), https://itep.org/undocumented-immigrants-taxes-2024/.

[36] Ryan Edwards & Francesc Ortega, *The Economic Contribution of Unauthorized Workers: An Industry Analysis*, 3 (Nat'l Bureau of Econ. Rsch., Working Paper No. 22834, 2016), https://www.nber.org/system/files/working_papers/w22834/w22834.pdf.

[37] *U.S. Immigration Statistics*, *supra* n.32.

enforcement action removed dozens of workers.[38] In Los Angeles, a spate of ICE raids has caused a slump in the restaurant industry, with fewer diners visiting restaurants and more workers calling out.[39] Leaders in hospitality,[40] childcare,[41] and construction[42] sectors also project workforce shortages due to increased immigration enforcement actions.

The decision by local governments to limit entanglement with federal immigration enforcement reflects the recognition that their immigrant populations are best able to contribute to economic growth

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[38] Nathaniel Meyersohn & Vanessa Yurkevich, *America's Migrant Workers Are Terrified to Work But Unable to Stay Home*, CNN (June 14, 2025), https://www.cnn.com/2025/06/13/business/ice-workplace-raids-home-depot.

[39] Karla M. Sanford, *Undocumented Workers Power L.A.'s Restaurants. Will the Industry Protect Them?*, L.A. Times (June 30, 2025), https://www.latimes.com/food/story/2025-06-30/los-angeles-restaurant-owners-protect-immigrant-workers-ice-raids.

[40] *See* Meyersohn & Yurkevich, *supra* n.38.

[41] *See* Ben Zipperer, *Trump's Deportation Agenda Will Destroy Millions of Jobs*, Econ. Pol'y Inst. (July 10, 2025), https://www.epi.org/publication/trumps-deportation-agenda-will-destroy-millions-of-jobs-both-immigrants-and-u-s-born-workers-would-suffer-job-losses-particularly-in-construction-and-child-care/.

[42] *See* Carter Evans, *Trump's Immigration Crackdown Causing Labor Shortages to California's Construction Industry, Builder Says: "They're hiding,"* CBS News (July 18, 2025), https://www.cbsnews.com/news/trump-immigration-crackdown-labor-shortages-california-construction-industry-builder-says/.

and a thriving community without the fear of indiscriminate enforcement hanging over their heads. That choice is eminently reasonable, and it is their choice to make, *see infra*.

III. So-Called Sanctuary Policies Promote Health and Welfare.

Entanglement with federal immigration enforcement also threatens the health of communities. It contributes directly to decreased health by stoking an atmosphere of fear and chaos and increasing stress among members of immigrant communities.[43] It also discourages

[43] *See* Allison McCord Stafford et al., *Documentation Status and Self-Rated Physical Health Among Latinx Young Adult Immigrants: The Mediating Roles of Immigration and Healthcare Stress*, 10 J. Racial & Ethnic Health Disparities 761, 769 (2023), https://pmc.ncbi.nlm.nih.gov/articles/PMC8853124/; Jacqueline M. Torres et al., *Deportation Worry, Cardiovascular Disease Risk Factor Trajectories, and Incident Hypertension: A Community-Based Cohort Study*, 8 J. Am. Heart Ass'n 1, 9 (2019), https://www.ahajournals.org/doi/10.1161/JAHA.119.013086.

individuals from seeking out the medical care they or their families need.[44]

In fact, as reported by the *New York Times* last year, one in five lawfully present immigrants said that they or a family member had avoided seeking medical care because of their concerns about immigration enforcement.[45] As ICE raids have ramped up across the country, social workers, doctors, and medical professionals have seen upticks in patient anxiety, appointment no-shows, and reluctance from immigrants to access medical resources—including emergency care.[46] A July 2025 *Associated Press* report found that in the Rio Grande Valley,

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[44] *See also* Karen Hacker et al., *The Impact of Immigration and Customs Enforcement on Immigrant Health: Perceptions of Immigrants in Everett, Massachusetts, USA*, 73 Soc. Sci. & Med. 586, 589 (2011), https://www.sciencedirect.com/science/article/abs/pii/S0277953611003522 (analyzing focus group discussions and finding that immigrants' removal fears led to avoidance of care); Patricia A. Cavazos-Rehg et al., *Legal Status, Emotional Well-Being and Subjective Health Status of Latino Immigrants*, 99 J. Nat'l Med. Ass'n 1126, 1130 (2007), https://pmc.ncbi.nlm.nih.gov/articles/PMC2574408/ (surveying 143 Latino immigrants and finding 39 percent indicated they avoided social services for fear of removal).

[45] Emily Baumgaertner Nunn et al., *Migrants Are Skipping Medical Care, Fearing ICE, Doctors Say*, N.Y. Times (May 8, 2025), https://www.nytimes.com/2025/05/08/health/migrants-health-care-trump.html.

[46] *Id.*

where health outcomes were already worse than the national average, increased immigration enforcement activity has caused many to skip medical appointments, fail to pick up prescriptions, and even refuse to sign their children up for health insurance.[47]

When this happens, the overall impact is not limited to immigrants; it affects entire communities. As the American Public Health Association notes, "[t]he health of the nation cannot be upheld, promoted, or protected when our immigrant and refugee communities are in fear of being detained and deported."[48] That is at least in part because when

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[47] Amanda Seitz & Jacquelyn Martin, *As Trump's Raids Ramp Up, a Texas Region's Residents Stay Inside - Even When They Need Medical Care*, AP News (July 21, 2025), https://apnews.com/article/trump-immigration-medicaid-health-illegal-985fb65ee53095d5cedf39bdac58500f; *see also Study Finds Trump's Election Was Associated With Decrease in Well-Child Visits for Children of Immigrant Mothers*, Boston University (Sept. 8, 2023), https://medicalxpress.com/news/2023-09-trump-election-decrease-well-child-children.html (finding that anti-immigration rhetoric during the 2016 presidential election cycle, and the anti-immigration policy that followed, was associated with a decline in well-child visits for children of immigrant mothers).

[48] *Public Health Talking Points for Immigration Justice*, Health In Partnership, https://www.apha.org/getContentAsset/8c14db2e-633d-4541-ab60-d0f9de174b08/7ca0dc9d-611d-46e2-9fd3-26a4c03ddcbb/HIP-Public-Health-Talking-Points-for-Immigration-Justice-2025.pdf?language=en (last visited Aug. 20, 2025).

immigrants are reluctant to seek out healthcare for communicable diseases, it is more likely that such diseases will spread to others, including those outside of immigrant communities.[49] For example, a study found that tuberculosis outbreaks are more likely when fear of immigration enforcement deters immigrants from accessing healthcare.[50]

But policies like those challenged in this case can mitigate the negative impact that fear of immigration enforcement would otherwise have on public health.[51] As Santa Clara County Executive James R. Williams has explained, these policies "promote community members' trust in government services. With that trust comes increased engagement with County systems across the board, from maternal and

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[49] Jan Hoffman, *Sick and Afraid, Some Immigrants Forgo Medical Care*, N.Y. Times (June 26, 2017), https://www.nytimes.com/2017/06/26/health/undocumented-immigrants-health-care.html.

[50] Steven Asch, Barbara Leake & Lillian Gelberg, *Does Fear of Immigration Authorities Deter Tuberculosis Patients From Seeking Care?*, 161 West J. Med. 373, 373 (1994), https://pmc.ncbi.nlm.nih.gov/articles/PMC1022616/.

[51] Helen B. Marrow, *The Power of Local Autonomy: Expanding Health Care to Unauthorized Immigrants in San Francisco*, 35 Ethnic & Racial Stud. 72, 84 (2012), https://www.taylorfrancis.com/chapters/edit/10.4324/9781315868622-6/power-local-autonomy-helen-marrow.

pediatric healthcare to services for vulnerable seniors, increasing the well-being of the entire community."[52] The federal government's efforts to undermine those sound policies should be rebuffed.

* * * * * * * *

[52] *See* Dkt. 76, Declaration of Support for Preliminary Injunction, *San Francisco v. Trump*, No. 25-CV-01350 (N.D. Cal. Mar. 17, 2025).

What is happening here is a repeat of the same arguments that the Trump Administration has pressed and lost many times before.[53] To put it plainly, no federal law prohibits or displaces the kind of local decisions challenged here. Indeed, any contrary conclusion would run afoul of the U.S. Constitution, which prevents Congress from "strong arm[ing]" local governments "into doing its bidding." *Ocean*, 475 F. Supp. 3d at 381 (rejecting the same arguments raised in this case); *Murphy v. Nat'l Collegiate Athletic Ass'n*, 584 U.S. 453, 474 (2018) ("A more direct affront to state sovereignty is not easy to imagine" than in a federal law that "dictates what a state legislature may and may not do."). The Trump Administration thus lacks any legal basis for the claims it presses in this case, or indeed to support its more general endeavor to usurp state and local governments to carry out offensive and dangerous immigration policy, *see United States v. New York*, No. 25 Civ. 744, 2025 WL 3205011, at *13, *16–20 (N.D.N.Y. Nov. 17, 2025) (dismissing similar claims); *United States v. Illinois*, No. 25 Civ. 1285, 2025 WL 2098688, at *18, *25–27 (N.D. Ill. July 25, 2025) (same).

State and local governments like Amici are duty-bound to promote the safety and welfare of all residents in their communities, regardless of

[53] *See Chicago v. Sessions*, 321 F. Supp. 3d 855, 868–69, 872 (N.D. Ill. 2018) (holding that § 1373 offends the anticommandeering doctrine because it "does not evenhandedly regulate activities in which both private and government actors engage") *aff'd sub nom City of Chicago v. Barr*, 961 F.3d 882 (7th Cir. 2020); *Ocean v. Grewal*, 475 F. Supp. 3d 355, 372, 376 (D.N.J. 2020) (holding that 8 U.S.C. § 1373 applies "only to information specifically regarding an individual's immigration or citizenship status" and that "sections 1373(a) and 1644 do not constitute preemption provisions"), *aff'd*, *Ocean Cnty. Board of Comm'rs v. New Jersey*, 8 F.4th 176 (3d Cir. 2021); *United States v. New Jersey*, No. 20-1364, 2021 WL 252270, at *13 (D.N.J. Jan. 26, 2021) (reaffirming conclusion in *Ocean*); *San Francisco v. Garland*, 42 F.4th 1078, 1085 (9th Cir. 2022) (noting that the Ninth Circuit has "rejected DOJ's interpretation of Section 1373 repeatedly"); *San Francisco v. Barr*, 965 F.3d 753, 764 (9th Cir. 2020) (holding that "the only information to which § 1373 extends" is "information regarding a person's citizenship or immigration status"); *Steinle v. San Francisco*, 919 F.3d 1154, 1164 (9th Cir. 2019) (holding that "no plausible reading of 'information regarding' 'immigration status' encompasses the state or local release date of an inmate who is an alien"); *United States v. Illinois*, No. 25-CV-1285, 2025 WL 2098688, at *10 (N.D. Ill. July 25, 2025) (noting that "[w]ithout exception," courts have "rejected the [government's] capacious reading"); *United States v. California*, 314 F. Supp. 3d 1077, 1102 (E.D. Cal. 2018) ("[T]he plain meaning of Section 1373 limits its reach to information strictly pertaining to immigration status (i.e. what one's immigration status is) and does not include information like release dates and addresses."), *rev'd in part on other grounds*, *United States v. California*, 921 F.3d 865, 891 (9th Cir. 2019) ("[T]he United States argues that § 1373 actually applies to more information than just immigration status .... We disagree."); *Philadelphia v. Sessions*, 309 F. Supp. 3d 289, 329–33 (E.D. Pa. 2018) (holding that § 1373(a) refers to "an individual's category of presence in the United States—e.g., undocumented, refugee, lawful permanent resident, U.S. citizen, etc.—and whether or not an individual is a U.S. citizen, and if not, of what country," and that § 1373(a) and § 1373(b) "[o]n their face . . . regulate state and local governmental entities and officials, which is fatal to their constitutionality under the Tenth

immigration status. In enacting the challenged policies, the State of Colorado and City and County of Denver and their leaders have lawfully exercised their sovereign duty to do just that.

CONCLUSION

Amici support Appellees and respectfully submit that the district court's decision should be affirmed.

Dated: November 17, 2026

Respectfully submitted,

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City of Allentown, Pennsylvania

City of Beaverton, Oregon

City of Bellingham, Washington

City of Bend, Oregon

City of Berkeley, California

City of Boston, Massachusetts

City of Burlington, Vermont

City of Cambridge, Massachusetts

City of Chicago, Illinois

City of Cincinnati, Ohio

City of Culver City, California

City of Evanston, Illinois

City of Frederick, Maryland

City of Jersey City, New Jersey

City of Kenmore, Washington

Lincoln County, Maine

County of Los Angeles, California

City of Los Angeles, California

City of Madison, Wisconsin

County of Marin, California

Martin Luther King, Jr. County, Washington

City of Minneapolis, Minnesota

Montgomery County, Maryland

City of New Haven, Connecticut

City of Norfolk, Virginia

City of Northampton, Massachusetts

City of Olympia, Washington

City of Oxnard, California

City of Pittsburgh, Pennsylvania

City of Portland, Oregon

City of Providence, Rhode Island

City of Rochester, New York

City of Sacramento, California

County of San Diego, California

City of San Diego, California

City and County of San Francisco, California

City of San José, California

County of San Mateo, California

County of Santa Clara, California

City of Santa Monica, California

City of Seattle, Washington

City of Somerville, Massachusetts

City of St. Paul, Minnesota

City of Tacoma, Washington

City of West Hollywood, California

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CERTIFICATE OF SERVICE

I hereby certify that on November 17, 2026, I electronically filed the foregoing using the court's CM/ECF system, which will send notification to counsel for all participants by operation of the CM/ECF system.

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