

# **EXHIBIT A**

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8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN FRANCISCO DIVISION

12 CITY AND COUNTY OF SAN FRANCISCO,  
 13 Plaintiff,  
 14 v.  
 15 DONALD J. TRUMP, et. al.,  
 16 Defendants.

Case No. 3:17-cv-00485-WHO

Case No. 3:17-cv-00574-WHO

**PROPOSED BRIEF OF RELIGIOUS  
 ORGANIZATIONS AS AMICI CURIAE IN  
 SUPPORT OF PLAINTIFFS' MOTIONS  
 FOR SUMMARY JUDGMENT**

Judge: Hon. William H. Orrick

17 COUNTY OF SANTA CLARA,  
 18 Plaintiff,  
 19 v.  
 20 DONALD J. TRUMP, et. al.,  
 21 Defendants.

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1 **INTRODUCTION**

2 *Amici* represent a diverse group of religious organizations and speak on behalf of the  
 3 millions of Americans to whom such religious organizations minister or offer services, and with  
 4 whom they share a common faith. *Amici* are united in their belief that Executive Order 13,678  
 5 (the “Executive Order”) is immoral and will harm their communities. The Executive Order puts  
 6 cities and counties in an untenable position: they either sacrifice policies that create welcoming  
 7 communities and promote public safety or risk devastating funding cuts that would harm those in  
 8 need and threaten public safety. Because *amici* minister to and care for communities throughout  
 9 the United States, they provide a unique perspective on the irreparable harm the Executive Order  
 10 will inflict if not permanently enjoined, as well as the public interest that will be served through  
 11 the issuance of a permanent injunction. *Amici* therefore offer to the Court their experiences and  
 12 beliefs in urging that the Court issue a permanent injunction against the Executive Order.

13 **ARGUMENT**

14 **I. THE EXECUTIVE ORDER HARMS THOSE MOST IN NEED**

15 The world’s major faiths emphasize helping those in need:

16 Judaism teaches: “Defend the weak and the fatherless; uphold the cause of  
 17 the poor and the oppressed. Rescue the weak and the needy; deliver them  
 18 from the hand of the wicked.” Psalm 82:3-4. “If there is a poor man  
 19 among your brothers in any of the towns of the land that the LORD your  
 20 God is giving you, do not be hardhearted or tightfisted toward your poor  
 21 brother.” Deuteronomy 15:7.

22 Christianity teaches: “When he had finished washing their feet, he put on  
 23 his clothes and returned to his place. ‘Do you understand what I have  
 24 done for you?’ he asked them. ‘You call me Teacher and Lord, and  
 25 rightly so, for that is what I am. Now that I, your Lord and Teacher, have  
 26 washed your feet, you also should wash one another’s feet.’” John 13:12-  
 27 14. “You shall love your neighbor as yourself.” Leviticus 19:18.

28 Islam instructs: “(The righteous are those) who feed the poor, the orphan  
 and the captive for the love of God, saying: We feed you for the sake of  
 God Alone; we seek from you neither reward nor thanks.” Qur’an, 76:8-9.  
 “Not one of you is a believer until he loves for his brother what he loves  
 for himself.” Hadith 13.

Under the Executive Order, those most in need—the weak, the poor, the oppressed, the orphans—  
 will bear the weight of cuts in federal funding if cities and counties refuse to be coerced into

1 leaving their immigrant brothers and sisters isolated and subject to crime and exploitation. And if  
 2 cities and counties buckle to the coercion, immigrants will suffer.

3 **A. Communities Will Be Harmed if Localities Are Forced to Abandon So-Called**  
 4 **Sanctuary Laws and Policies**

5 **1. *Amici* Have Observed the Fear the Executive Order Has Created**  
 6 **Among Immigrant Communities**

7 Claiming that it will enhance public safety, the Executive Order disqualifies so-called  
 8 “sanctuary jurisdictions”<sup>1</sup> from receiving federal funds. But the Executive Order will have the  
 9 opposite effect—public safety, particularly the safety of immigrants—will be compromised, not  
 10 enhanced, under the order. Namely, the effect of the Executive Order is a society where  
 11 immigrants live in fear of contact with police because it means the risk of deportation, and they  
 12 suffer disproportionately as a result. Such an outcome deeply offends the beliefs of *amici*.  
 13 *Amicus* Southwest Conference of the United Church of Christ warns against creating  
 14 “communities wherein people are afraid to go to the police and thus render criminals  
 15 unaccountable for their behaviors, which promotes communities wherein violence rather than  
 16 peace reigns.” *Amicus* Valley Unitarian Universalist Congregation puts the problem in stark  
 17 terms. Its faith “calls out to reach out to those in pain,” yet the Executive Order “would force  
 18 domestic violence victims to make the unconscionable choice between deportation and personal  
 19 safety. Lives would likely be lost.”

20 Because immigrants are valued members of the congregations of *amici*, as well as  
 21 members of the populations that *amici* serve, *amici* have seen firsthand how fear of deportation  
 22 has manifested in the wake of the Executive Order and know that it goes beyond an avoidance of  
 23 the police. For example, *amicus* Good Shepherd United Church of Christ of the Santa Cruz  
 24 Valley observed a significant drop in the number of people coming to its food bank immediately  
 25 after the Executive Order issued. Church leaders report that the people whom they still serve

26 <sup>1</sup> The Executive Order provides no definition for “sanctuary jurisdictions.” However,  
 27 public statements from the Administration suggest that the Administration intends at least to  
 28 target cities and counties that decline to hold detainees under ICE detainers beyond the date they  
 would otherwise be released. See Joseph Serna, *Trump Administration Cites California Law*  
*Enforcement for Failing to Cooperate in Deportation Crackdown*, L.A. TIMES (Mar. 20, 2017),  
<http://www.latimes.com/local/lanow/la-me-ln-ice-detainer-request-list-20170320-story.html>.



1 have explained that their friends and/or families are too scared to venture out of their homes—  
 2 even at the risk of going hungry. This has happened even though Good Shepherd United Church  
 3 of Christ has no affiliation with law enforcement and despite police in the area promising  
 4 communities that they will not comply with ICE detainer requests.

5 The Executive Order is forcing immigrants to retreat from civic life entirely, so they  
 6 cannot avail themselves of medical or social services—even at their times of greatest need. To  
 7 this point, *amicus* Southwest Conference of the United Church of Christ includes congregations  
 8 with homeless and undocumented youth members. Many of these young people live in complete  
 9 terror at the prospect that their information or their loved ones' information will fall into the  
 10 hands of ICE. Church officials report the story of a young woman who injured herself on a flight  
 11 of stairs and refused to go to a hospital or urgent care for fear that her personal information might  
 12 be transmitted to ICE, thereby exposing her or her family members to deportation. Such is the  
 13 depth of the fear that the Executive Order has instilled, and the harm that it has and will continue  
 14 to inflict on our communities absent a permanent injunction.

## 15 2. The Experiences and Concerns of *Amici* Are Echoed by Local Leaders 16 and Law Enforcement

17 *Amici* believe that the fear and harm that they have observed are not unique to their  
 18 organizations. Indeed, local leaders throughout the country have explained that the safety and  
 19 well-being of communities is the purpose of the laws and policies targeted by the Executive  
 20 Order. As the mayor of New Orleans explained:

21 First and foremost, the NOPD does now and will continue to follow federal laws  
 22 and focus on arresting people who commit crime, regardless of their immigration  
 23 status . . . . The NOPD's policy on immigration complies with federal law and  
 24 makes New Orleans safer because individuals are more likely to report crime, and  
 25 victims and witnesses can testify without fear of being questioned about their  
 26 immigration status. That's why the NOPD will continue to focus on arresting  
 those who commit violent crimes, not enforcing civil immigration laws.<sup>2</sup>

27 <sup>2</sup> *Trump Administration Says New Orleans 'Uncooperative' with Immigration Detainers;*  
 28 *Landrieu Responds*, WGNO WED DESK (Mar. 21, 2017), <http://wgno.com/2017/03/21/trump-administration-says-new-orleans-uncooperative-with-immigration-detainers-landrieu-responds/>.

1 Similarly, the Mayor of San Jose explained that “our police chief is the best person to decide how  
2 to use the scarce resources we have. It’s not simply an ideological decision.”<sup>3</sup>

3 The law enforcement community—those best positioned to know how to reduce crime  
4 and promote public safety—agree that the maintenance of trust between police and the  
5 communities they serve is paramount for building safe and healthy communities. As the  
6 President of the Major Cities Chiefs Association (which represents police executives for the  
7 largest cities in the United States and Canada) explained during testimony to the United States  
8 Senate:

9 To do our job we must have the trust and respect of the communities we serve.  
10 We fail if the public fears their police and will not come forward when we need  
11 them. Whether we seek to stop child predators, drug dealers, rapists or robbers—  
12 we need the full cooperation of victims and witnesses. Cooperation is not  
13 forthcoming from persons who see their police as immigration agents. When  
immigrants come to view their local police and sheriffs with distrust because they  
fear deportation, it creates conditions that encourage criminals to prey upon  
victims and witnesses alike.<sup>4</sup>

14 In response to the Executive Order, the United States Conference of Mayors and the Major Cities  
15 Chiefs Association, issued a joint position statement:

16 Cities that aim to build trusting and supportive relations with immigrant  
17 communities should not be punished because this is essential to reducing crime  
18 and helping victims . . . . We must be able to continue to protect the safety of all  
of our residents while ensuring that local law enforcement is focused on  
community policing.<sup>5</sup>

19 Similarly, a report by the International Association of Chiefs of Police warned of a “chilling  
20 effect” in immigrant communities if local police cooperated with federal deportation efforts, such  
21

22 <sup>3</sup> Tara Smith, *American Cities Large and Small are Forming Their Own Wall Against*  
23 *Trump*, DEADSTATE (Jan. 27, 2017), <http://deadstate.org/american-cities-large-and-small-are-forming-their-own-wall-against-trump/>.

24 <sup>4</sup> Testimony of Tom Manger, Chief of Police, President of the Major Cities Chiefs  
25 Association on Behalf of Montgomery County Police Department and Major Cities Chiefs  
26 Association Before the Judicial Committee, Chairman Grassley, Presiding, United States Senate,  
27 Hearing: Oversight of the Administration’s Misdirected Immigration Enforcement Policies:  
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<sup>5</sup> *U.S. Mayors, Police Chiefs Concerned with Sanctuary Cities Executive Order*, U.S.  
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[https://www.majorcitieschiefs.com/pdf/news/mcca\\_mayors\\_pr\\_on\\_eo\\_12517.pdf](https://www.majorcitieschiefs.com/pdf/news/mcca_mayors_pr_on_eo_12517.pdf).

1 that those communities would be less willing to cooperate with the police in solving crimes, even  
2 if the crimes were committed against their own family members.<sup>6</sup>

3 Available evidence bears out the concerns expressed by law enforcement officials and  
4 local leaders. In the wake of the Executive Order, the Los Angeles Police Chief reports that  
5 police reports of sexual assault and domestic violence among Latino constituents have  
6 plummeted.<sup>7</sup> The Police Chief of Houston reported a similar trend.<sup>8</sup> Without question, victims of  
7 domestic violence are some of the most vulnerable and needy individuals in our society,  
8 particularly immigrant victims, who may be without a strong support network and may toil in the  
9 shadows of society. If these victims cannot turn to the police because of fears of deportation, they  
10 are left to fend for themselves, often alone. While *amici* minister and provide services to such  
11 individuals, who are neighbors in their communities, their role is limited; *amici* cannot replace the  
12 police, who are uniquely empowered to stop the violent and abusive conduct perpetrated against  
13 these most vulnerable of victims.

14 The fear that the Executive Order manifests is so severe as to cause immigrants to avoid  
15 assistance even in the face of immediate and severe peril. In the wake of the devastation caused  
16 by Hurricane Harvey, which hit Houston just six weeks ago, immigrants who needed temporary  
17 shelter or assistance at food banks were so fearful that they would be met by ICE that the mayor  
18 of Houston felt compelled to make a public statement urging people not to risk their lives by  
19 avoiding help.<sup>9</sup> *Amici*, who, like many religious organizations in this country, administer disaster

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20  
21 <sup>6</sup> *Enforcement Immigration Law: The Role of State, Tribal and Local Law Enforcement*,  
INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE,  
22 <http://www.theiacp.org/portals/0/pdfs/publications/immigrationenforcementconf.pdf> (last visited  
23 Sep. 22, 2017).

24 <sup>7</sup> James Queally, *Latinos are Reporting Fewer Sexual Assaults Amid a Climate of Fear in  
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25 <sup>8</sup> Brooke A. Lewis, *HPD Chief Announces Decrease in Hispanics Reporting Rape and  
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26 [http://www.chron.com/news/houston-texas/houston/article/HPD-chief-announces-decrease-in-  
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27 <sup>9</sup> Julian Aguilar, *Houston Mayor: Residents Shouldn't Let "Sanctuary Cities" Law Deter  
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28 [https://www.texastribune.org/2017/08/28/houston-mayor-turner-says-put-sb4-shelf-during-  
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1 relief services, cannot help those who are too afraid to come forward.

2 **B. Absent an Injunction, Localities that Maintain So-Called Sanctuary Laws and**  
 3 **Policies Will Lose Federal Funding, Resulting in Harm to Their Communities**

4 **1. People of Faith Prioritize Caring for Those in Need, but Their Efforts**  
 5 **Cannot Make Up for the Funding Shortfall the Executive Order will**  
 6 **Create**

7 Charitable giving is a hallmark of many religious faiths. These acts may come in the form  
 8 of a tithe or other financial acts of charity, as well as the direct administration of aid to those in  
 9 need. Indeed, religious giving in the United States represents the largest portion of charitable  
 10 giving in the country,<sup>10</sup> and in turn the vast majority of congregations and religious organizations  
 11 in the United States engage in some sort of social or human services, community development, or  
 12 other projects to help people outside of their congregations.<sup>11</sup> The services that religious  
 13 congregations in this country provide are vital, with food assistance as the most common type of  
 14 aid administered, followed by health programs and housing and shelter services.<sup>12</sup>

15 Religious charities already face enormous pressure to care for those in need. Because the  
 16 Executive Order threatens to deprive cities and counties with sanctuary laws and policies of *all*  
 17 federal funds, the increase in need that the Executive Order will create due to cuts in federal  
 18 funding absent a permanent injunction will go far beyond what religious organizations are able to  
 19 provide. Indeed, San Francisco and Santa Clara County rely on federal funding for services that  
 20 provide critical safety nets to their most vulnerable residents, including safety-net healthcare for  
 21 indigent and underserved patients, social services that protect families living in poverty, children,  
 22 disabled residents and the elderly, and behavioral health services.<sup>13</sup> Religious and other

23 <sup>10</sup> Thad Austin, M. Div., *Giving to Religion: Highlights of the 2016 Giving USA Report*,  
 24 LILLY FAMILY SCHOOL OF PHILANTHROPY, INDIANA UNIVERSITY-PURDUE UNIVERSITY,  
 25 INDIANAPOLIS, <https://philanthropy.iupui.edu/news-events/insights-newsletter/2016-issues/june-2016-issue2.html> (last visited Sept. 22, 2017).

26 <sup>11</sup> Mark Chaves and Alison J. Eagle, *Congregations and Social Services: An Update from*  
 27 *the Third Wave of the National Congregations Study*, *Religions* 2016, 7, 55;  
 28 doi:10.3390/rel7050055 at 4.

<sup>12</sup> *Id.*

<sup>13</sup> Second Amended Complaint for Declaratory and Injunctive Relief ¶¶ 105-16, *City of*  
*San Francisco v. Trump*, No. 3:17-cv-00485-WHO (N.D. Cal. May 23, 2017) (“San Francisco  
 SAC”), Dkt. No. 105; Complaint for Declaratory and Injunctive Relief ¶¶ 27-40, *Cty. of Santa*  
*Clara v. Trump*, No. 3:17-cv-00574-WHO (N.D. Cal. Feb. 3, 2017), Dkt. No. 1 (“Santa Clara  
 Complaint”).

1 charitable organizations could not begin to replace such a wide range of crucial services if federal  
2 funding is cut. The situation is equally grim in cities and counties across the country. One report  
3 anticipates that the Executive Order could lead to a loss of almost \$27 billion to cities across the  
4 nation.<sup>14</sup> New York City alone estimates that it stands to lose \$10.4 billion in federal funds,  
5 among the largest recipients of which are the Department of Social Services, the New York City  
6 Housing Authority, and the Administration for Children’s Services.<sup>15</sup>

7 As *amicus* Southwest Conference of the United Church of Christ observes, no matter how  
8 zealously *amici* and other religious organizations work to care for those who need compassion  
9 and assistance, it is simply impossible for religious groups to do so without government  
10 assistance: “The generosity of people of faith already cannot fill the gap between people’s needs  
11 and the limit of government assistance. There is already too much slack to pick up.” *Amicus*  
12 Valley Unitarian Universalist Congregation makes great efforts to care for its community  
13 members through meal and housing programs for its homeless neighbors, but knows that “it is  
14 impossible for congregations and other non-profits to provide for all the needs of the most  
15 vulnerable among us.” Its budget cannot accommodate the entirety of the current need, much less  
16 the expanded need that will emerge if the Executive Order is not permanently enjoined.

17 *Amici* Sisters of St. Francis of Clinton, Iowa minister in a number of locales and expect  
18 that the needs within those communities will increase significantly if federal funding is cut.  
19 Similarly, *amicus* Alliance of Baptists, whose ministries operate food banks, shelters for the  
20 homeless, domestic services, and emergency funds, worries about the ability of faith-based  
21 organizations to provide adequate care to the people who may lose access to critical services  
22 under the Executive Order when funding is cut: “Even if all the churches and faith communities  
23 in the country worked together, we could not solve these problems. We yearn for public policies  
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26 <sup>14</sup> Adam Andrejewski, *Federal Funding of America’s Sanctuary Cities*, OPEN THE BOOKS  
27 OVERSIGHT REPORT (Feb. 2017),  
28 [https://www.openthebooks.com/assets/1/7/Oversight\\_FederalFundingofAmericasSanctuaryCities.pdf](https://www.openthebooks.com/assets/1/7/Oversight_FederalFundingofAmericasSanctuaryCities.pdf).

<sup>15</sup> Octavio Blanco, *Sanctuary Cities Risk Billions in Defiance of Trump* (Nov. 19. 2016),  
CNN, <http://money.cnn.com/2016/11/19/news/economy/sanctuary-cities-trump-funding/>.

1 and governmental programs that benefit the common good—that help *all* members of our  
2 communities thrive and flourish with adequate resources and access to the basic means of life.”

3 Because the Executive Order makes no distinction between the types of federal funds  
4 under threat, it encompasses even funds provided to local governments through entitlements,  
5 including Medicare or Medicaid reimbursements. Because public hospitals provide a critical  
6 safety net for the uninsured, cuts to their funding would be especially devastating. Many  
7 Medicaid patients already report difficulty finding providers,<sup>16</sup> so cutting off Medicaid and  
8 Medicare reimbursements to public hospitals in the cities and counties in the Executive Order’s  
9 crosshairs will push an already critical public health issue to its breaking point, and harm millions  
10 of Americans in the process. *Amici* work hand in hand with hospitals, charities, and agencies that  
11 provide this critical safety net, and believe that such an outcome is morally repugnant because it  
12 harms those most in need. As *amici* Sisters of St. Francis of Clinton, Iowa remind us, the basic  
13 moral test for a society is how its most vulnerable members are faring. The Executive Order fails  
14 this fundamental test and causes tremendous suffering in the process.

15 The threatened cuts could extend as far as depriving localities of aid in the face of  
16 devastating national disasters. To wit, among the federal funds that have been allocated for relief  
17 efforts following the recent string of unprecedented natural disasters is \$7.4 billion in federal  
18 grants that are awarded to cities, counties, and states for their disaster recovery efforts.<sup>17</sup> To the  
19 extent that a city or county with such a need were deprived of federal grants due to the Executive  
20 Order, the suffering experienced by thousands of blameless victims who already endured  
21 incalculable losses would be exacerbated.

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24 <sup>16</sup> Elizabeth Renter, *You’ve Got Medicaid – Why Can’t You See the Doctor?*, U.S. NEWS  
25 & WORLD REPORT (Mar. 26, 2015), <http://health.usnews.com/health-news/health-insurance/articles/2015/05/26/youve-got-medicaid-why-cant-you-see-the-doctor>.

26 <sup>17</sup> Kriston Capps, *Endangered HUD Funds Will Drive the Hurricane Recovery*, CITY LAB  
27 (Sep. 11, 2017), [https://www.citylab.com/equity/2017/09/endangered-hud-funds-will-drive-the-hurricane-recovery/539373/?utm\\_source=nl\\_\\_link1\\_091117&silverid=MzEwMTkxMTUyNTU1S0;Community+Development+Block+Grant+Disaster+Recovery+Program](https://www.citylab.com/equity/2017/09/endangered-hud-funds-will-drive-the-hurricane-recovery/539373/?utm_source=nl__link1_091117&silverid=MzEwMTkxMTUyNTU1S0;Community+Development+Block+Grant+Disaster+Recovery+Program), HUD EXCHANGE,  
28 <https://www.hudexchange.info/programs/cdbg-dr/> (last visited Sep. 22, 2017).



1           As *amicus* Trinity Missions observes, “withholding local funding is just another example  
2 of punishing the poor for no justifiable reason whatsoever. It hits communities that are trying to  
3 work on building bridges with the immigrant community—through withholding funding—and  
4 destroys the bridges one brick at a time.” *Amicus* Southwest Conference of the United Church of  
5 Christ decries that the Executive Order uses the most vulnerable among us as pawns to achieve  
6 the Administration’s goals. As *amicus* Alliance of Baptists explains, when local communities  
7 take action to address issues of justice, equality, and inclusion within their communities, they  
8 should receive support and praise, not scorn. *Amicus* Valley Unitarian Universalist Congregation  
9 agrees: “it is deeply callous and cynical to yoke funds used to care for the poor and sick,  
10 including children” to compliance with an order that the community deems harmful to its  
11 residents. But this is precisely what the Executive Order does.

12                           **2.       *Amici* and Other Religious Charities Rely on Flow-Through Grants**  
13                           **that Are Subject to the Executive Order**

14           What is more, many of the charitable organizations run or supported by *amici* and  
15 religious organizations across the United States are dependent on federal funds that flow through  
16 their cities or counties. For example, *amicus* Good Shepherd United Church of Christ in  
17 Sahuarita, Arizona, receives community development grants that flow from the federal  
18 government to Pima County to Good Shepherd United Church of Christ’s charitable missions,  
19 which provide lifesaving assistance to border communities, including its “BackPack Program,”  
20 which provides food packages to children. That program relies on federal funds for almost half of  
21 its budget. In 2013 and 2014, the church’s food bank received federal pass-through county grants  
22 of the same type to purchase walk-in cold storage for its food bank, allowing it to serve hundreds  
23 of people each week, something that it would otherwise be unable to do. As the church’s  
24 leadership explains: “Neither feeding those who are hungry nor their progress from poverty to  
25 self-sufficiency can occur if funding is cut. We would have to turn away people who are hungry  
26 and those needing support for positive life changes. This would offend our religious mission.”  
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1 **II. THE PUBLIC INTEREST FAVORS GRANTING A PERMANENT INJUNCTION**

2 The public interest strongly weighs in favor of granting a permanent injunction against the  
3 Executive Order. The Executive Order, if not permanently enjoined, will injure the very fabric of  
4 communities by impeding the ability of cities and counties to care for their residents. For  
5 example, *amicus* Trinity Missions observes that “when there is fear that keeps people from  
6 making police reports, it slowly destroys the strength of the larger community/family—thus the  
7 community becomes less trusting and less safe.” *See also City of El Cenizo, et al. v. State of*  
8 *Texas, et al*, No. SA-17-CV-404-OLG, at 92 (W.D. Tex. Aug. 30, 2017) (finding overwhelming  
9 evidence that Texas Senate Bill 4, which prohibits cities in Texas from adopting so-called  
10 sanctuary policies “will erode public trust and make many communities and neighborhoods less  
11 safe”) (order granting preliminary injunction).

12 *Amici* Sisters of St. Francis of Clinton, Iowa, follow a doctrine called Catholic Social  
13 Teaching, which states that the measure of an institution is whether it threatens or enhances the  
14 life and dignity of the human person. By this measure, the Executive Order threatens to do great  
15 damage to the country’s cities and counties and to greatly harm the larger public interest.

16 **CONCLUSION**

17 If the Executive Order is not permanently enjoined, serious and irreparable harm to  
18 communities throughout the United States is assured. Those localities that are forced to abandon  
19 so-called sanctuary laws and policies because of threats of a loss of federal funds will do so at the  
20 expense of the safety and well-being of their immigrant residents. And those localities subject to  
21 the draconian funding cuts that the Executive Order threatens will be unable to fund critical  
22 services for those most in need in their communities. *Amici* therefore condemn the Executive  
23 Order in the strongest terms for the harm that it has and will continue to inflict upon communities  
24 across the United States if the Court’s injunction is not made permanent, and urge this Court to  
25 grant a nationwide permanent injunction.



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Dated: October 4, 2017

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