

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

U.H.A., K.A., H.D., D. Doe, M. Doe, on behalf of themselves and others similarly situated, *and THE ADVOCATES FOR HUMAN RIGHTS*,

Plaintiff-Petitioner and Plaintiffs,

v.

PAMELA BONDI, in their official capacity as Attorney General of the United States;

KRISTI NOEM, in her capacity as Secretary of the United States Department of Homeland Security;

TODD M. LYONS, in his official capacity as Acting Director of the United States Immigration and Customs Enforcement;

DAVID EASTERWOOD, in his official capacity as Acting Director, St. Paul Field Office, U.S. Immigration and Customs Enforcement; *and*

JOSEPH B. EDLOW, in his official capacity as Director, U.S. Citizenship and Immigration Services,

Defendants-Respondents.

Case No. 0:26-cv-00417-JRT-DLM

STATE OF MINNESOTA'S AMICUS
CURIAE BRIEF

INTRODUCTION

Minnesota is proud of its status as one of the primary destinations for refugees in the country. Refugees benefit the economy of our state and benefit every aspect of our communal life. Yet Defendants have chosen to attack those refugees. In doing so, they attack the fabric of our community and the ideals that make our state

a wonderful place to live. As a result, the State of Minnesota (“State”) submits this brief in support of injunctive relief.

Not only does Defendants’ policy and practice of detaining refugees who have not yet adjusted status to lawful permanent residence violate the Administrative Procedures Act, the Fourth Amendment, the Fifth Amendment, and the *Accardi* doctrine, but Defendants’ unlawful implementation of Operation PARRIS is violating Minnesota’s sovereign interests and harming the public interest. Operation PARRIS, especially in conjunction with Operation Metro Surge, is devastating Minnesota’s economy, causing school attendance to plummet, straining public health systems, unraveling civic life in many communities, and undermining state law enforcement.

INTEREST OF AMICUS

Minnesota has a profound interest in safeguarding the rights and well-being of all its residents, regardless of where they were born, and refugees are an integral part of Minnesota’s social fabric. It is estimated that approximately 100,000 refugees live in the state¹—for context, that is more people than live in the cities of either Duluth or Bloomington.² Minnesota has the highest number of refugees per

¹ *Immigrants in Minnesota*, American Immigration Council (2026), <https://map.americanimmigrationcouncil.org/locations/minnesota/>.

² <https://worldpopulationreview.com/us-cities/minnesota>

capita in the country.³ Between federal fiscal years 2022 and 2025 alone, Minnesota welcomed a total of 6,397 people with refugee status from 52 different nationalities.⁴ 5,879 of these refugees were under the age of 24 when they arrived.

The Minnesota Department of Human Services Resettlement Programs Office (“RPO”) serves as the state coordinating entity for refugee resettlement activities in Minnesota. As part of its work, RPO provides grants to more than 40 community partners who help families build wellbeing over their first five years in the United States. RPO’s work helps assist refugee families to become economically self-sufficient through a network of service providers across Minnesota. The RPO Resettlement Network Services providers screen participants for eligibility to adjust status and work to complete applications for adjustment of status. That adjustment process is slow. Of the 1,725 adjustment of status applications that RPO service providers helped to submit to USCIS in federal fiscal year 2024, 1,575 of those applications remain pending; all of the adjustment of status

³ Saengmany Ratsabout, *Immigrants and refugees in Minnesota - connecting past and present*, MINNPOST (Dec. 8, 2025), <https://www.minnpost.com/mnopedia/2025/12/immigrants-and-refugees-in-minnesota-connecting-past-and-present/>.

⁴ Unless otherwise noted, information and statistics specific to Minnesota’s refugee community were provided by the Minnesota Department of Human Services Resettlement Programs Office.

applications that RPO service providers helped to submit for refugees who arrived in federal fiscal year 2025 remain pending.⁵

Refugees make tremendous contributions to our state and nation. Between 2007 to 2017, “refugees brought in \$63 billion more in government revenues over the past decade than they cost.”⁶ Refugees enrich our community and make invaluable contributions to politics, business, and the arts. Some of Minnesota’s most prominent leaders first came to the United States as refugees, including United States Representative Ilhan Omar, former Minnesota State Senator Mee Moua, and bestselling author Kao Kalia Yang. Minnesota has a sovereign interest in protecting the health, safety, and education of all its residents, including the refugee community that contributes so greatly to our state.

FACTUAL BACKGROUND

On January 9, 2026, the Department of Homeland Security (“DHS”) and U.S. Citizenship and Immigration Services (“USCIS”) launched Operation PARRIS (Post-Admission Refugee Reverification and Integrity Strengthening), “a sweeping initiative reexamining thousands of refugee cases through new background checks

⁵ Because not all refugees work with an RPO service provider when submitting their applications for adjustment of status, these numbers underrepresent the number of refugees with pending applications before USCIS.

⁶ *Rejected Report Shows Revenue Brought In by Refugees*, N.Y. TIMES (Sept. 19, 2017), <https://www.nytimes.com/interactive/2017/09/19/us/politics/document-Refugee-Report.html>.

and intensive verification of refugee claims.”⁷ This new operation, initially focused on “Minnesota’s 5,600 refugees who have not yet been given lawful permanent resident status,” was launched in the midst of Operation Metro Surge, during which Defendants have deployed over 3,000⁸ federal immigration enforcement agents across the state of Minnesota.⁹

Numerous Minnesota refugees have already been unlawfully detained. Many individuals’ habeas petitions have been granted, with courts repeatedly holding that Defendants’ policy and practice of detaining unadjusted refugees under the guise of Operation PARRIS is unlawful. *See, e.g., Darvin M. v. Bondi*, No. 26-CV-0437 (SRN/EMB), --- F. Supp. 3d ---, 2026 WL 184843, at *2-6 (D. Minn. Jan. 24, 2026); *Aleksander B. v. Trump*, No. 26-cv-170 (KMM/DJF), 2026 WL 172435, at *3-6 (D. Minn. Jan. 22, 2026); *Andrei C. v. Lyons*, No. 26-CV-0166 (SRN/ECW), 2026 WL 123083, at *2-3 (D. Minn. Jan. 16, 2026); *Liban G. v. Noem*, No. 26-CV-

⁷ News Release, U.S. Citizenship and Immigration Services, *DHS Launches Landmark USCIS Fraud Investigation in Minnesota* (Jan. 9, 2026), <https://www.uscis.gov/newsroom/news-releases/dhs-launches-landmark-uscis-fraud-investigation-in-minnesota>.

⁸ FOX 9 Staff, ICE in MN: More than 3,000 federal agents in MN for Operation Metro Surge, DOJ attorney says, FOX 9, (Jan. 26, 2026, 12:03 p.m. CST), <https://www.fox9.com/news/ice-minnesota-how-many-feds-minnesota>.

⁹ The fear that Minnesota’s refugee community is experiencing—as well as the impacts of Defendants’ policy and practice of unlawfully detaining unadjusted refugees in pursuit of Operation PARRIS—is inextricably intertwined with the broader impacts of Operation Metro Surge. Accordingly, the State’s brief includes references to the impact of both Operation PARRIS and Operation Metro Surge on the Minnesota community.

0301 (SRN/ECW), 2026 WL 185334, at *3-6 (D. Minn. Jan. 23, 2026); *Ta Eh Doh Lah v. Bondi*, No. 26-00171 (MJD/SGE), 2026 WL 184529, at *2 (D. Minn. Jan. 23, 2026).

ARGUMENT

The State focuses here on one of the four factors at issue: whether preliminary relief is in the public interest. *Winter v. Nat. Res. Def. Council*, 555 U.S. 7, 20 (2008). The public interest is particularly relevant where the impact extends beyond the parties and carries consequences for the general public. *Stormans, Inc. v. Selecky*, 586 F.3d 1109, 1139 (9th Cir. 2009). The State has a sovereign interest to protect health and safety, provide education, and prevent harm to its economy. *See, e.g., City and County of San Francisco v. USCIS*, 981 F.3d 742, 762 (9th Cir. 2020); *New York v. U.S. Department of Homeland Security*, 969 F.3d 42, 87 (2nd Cir. 2020); *Cook County, Illinois v. Wolf*, 962 F.3d 208, 233 (7th Cir. 2020).

As discussed below, the injuries suffered due to Operation PARRIS and the practices Defendants have deployed in its execution extend both to the refugees subject to these unlawful actions, as well as to the greater Minnesota population. They are felt throughout the state in numerous areas, including children's education, public health, the economy and food supply, civil society, and community safety. As such, a preliminary injunction is in the public interest.

I. IMPACT TO THE ECONOMY

Defendants' unlawful methods of implementing Operation PARRIS and Operation Metro Surge have disrupted and continue to disrupt Minnesota's economy by shuttering businesses and decreasing participation in the workforce. The Minnesota Chamber of Commerce has reported that “[p]ositive international migration has helped sustain population and labor force growth in Minnesota in the first quarter of the century,” with Minnesota's foreign-born labor force growing by 41% since 2010.¹⁰ However, many refugees and other immigrants integral to Minnesota's economy are now too scared to leave their homes to go to work.

All people who arrive with refugee status are authorized to work upon their entry into the United States. According to the Office of Assistant Secretary for Planning and Evaluation, between 2005-2019, the net fiscal impact of refugees and asylees was \$123.8 billion; “the net fiscal benefit to the federal government was estimated at \$31.5 billion, and the net fiscal benefit to state and local governments was estimated at \$92.3 billion.”¹¹ During this time period, refugees and asylees

¹⁰ Minnesota Chamber Foundation, *2026 Business Benchmarks Report*, <https://d15k2d11r6t6rl.cloudfront.net/pub/bfra/la2h29b2/kdd/ct3/410/2026%20Business%20Benchmarks%20report.pdf>

¹¹ Robin Ghertner et al., *The Fiscal Impact of Refugees and Asylees at the Federal, State, and Local Levels from 2005-2019*, OFFICE OF THE ASSISTANT SECRETARY FOR PLANNING AND EVALUATION, (Feb. 15, 2024), <https://aspe.hhs.gov/reports/fiscal-impact-refugees-asylees>.

contributed an estimated \$581 billion in revenue to federal, state, and local governments through payroll income, excise taxes, sales, and property taxes.¹²

In Minnesota, monthly earned income from people with refugee status who arrived in federal fiscal year (“FFY”) 2024 and FFY 2025 totaled \$3,623,136 as of January 15, 2026. During FFY 2024 and FFY 2025, RPO assisted 853 individuals to find employment through services funded through RPO.¹³ Of these 853 individuals, 70 were employed in health care services, 172 entered the workforce in manufacturing, and 50 entered the workforce in food manufacturing.

Because of the robust participation of refugees and immigrants in Minnesota’s workforce and sales, the negative economic impacts of Operation PARRIS and Operation Metro Surge are felt throughout Minnesota.¹⁴ In a news conference, Gary Wertish, the president of the Minnesota Farmers’ Union, expressed how Immigration and Customs Enforcement’s (“ICE”) actions have generated “a great deal of concern amongst our members”¹⁵ by creating a culture

¹² *Id.*

¹³ Minnesota Department of Human Services, *Welcome: Refugee Resettlement in Minnesota*, https://mn.gov/dhs/assets/Welcome%20-%20Refugee%20Resettlement%20in%20Minnesota_tcm1053-720067.pdf (last visited Feb. 3, 2026).

¹⁴ E.g., Emma Nelson, *Minneapolis Businesses Losing Millions in Sales Each Week as ICE Operation Continues*, STAR TRIBUNE (Feb. 5, 2026 4:42 PM), <https://www.startribune.com/ice-economic-impact-minneapolis-small-business-immigrant-owned-revenue-loss-financial/601576602>.

¹⁵ Minnesota Senate Media Services, *Press Conference: Impact of ICE Activity on Agriculture and Rural Communities*, at 5:15 (Jan. 14, 2026),

of fear, not just in the metro, but also in rural communities.¹⁶ Andrea Vaubel, Deputy Commissioner of the Minnesota Department of Agriculture, noted that this fear is leading to immigrant workers, both documented and undocumented, staying home out of fear of raids.¹⁷

A loss of food and agricultural workers due to fear can, and likely will, have profound downstream effects. Food and agriculture generate over \$105 billion in sales for Minnesota annually, and immigrants are a critical part of this workforce: approximately 1 in 5 employees in Minnesota's food manufacturing industry is an immigrant.¹⁸ Shortages in labor lead to high production costs, which will result in increased food prices for consumers.¹⁹ The actions being taken by the federal government will eventually have an impact on all Minnesotans at our local grocery stores if Defendants' actions continue. As Deputy Commissioner Vaubel noted: "This is devastating to our rural communities and the vitality of our rural towns."²⁰

Non-agricultural businesses in the State are also suffering. Businesses throughout Minnesota have closed due to recent immigration enforcement

<https://www.youtube.com/watch?v=mKyT1OAupv8> (on file with Minnesota Senate Media Services).

¹⁶ *Id.* at 6:48.

¹⁷ *Id.* at 10:00.

¹⁸ *Id.* at 9:00.

¹⁹ *Id.* at 10:13.

²⁰ *Id.* at 10:30.

operations.²¹ Since December 2025, sales at independent immigrant-run businesses along Minneapolis's Lake Street corridor have gone down 80% to 100%.²² St. Paul small-business owners serving immigrant communities are generally reporting sales down by 60% to 70%.²³ Businesses across the metro are also feeling the effects of ICE enforcement because hospitality workers are afraid to go to work or businesses need to cut hours.²⁴

The effects of Operation PARRIS and Operation Metro Surge extend beyond immigrant owned businesses. For example, comedian John Mulaney postponed his three-night stand at The Armory in January,²⁵ The Current cancelled its 21st

²¹ Hannah Yang, *Immigration enforcement in rural Minnesota spreads fear, strains local leaders*, MPR NEWS, (Jan. 28, 2026), <https://www.mprnews.org/story/2026/01/28/ice-in-greater-minnesota-mankato-spreads-fear>; Megan Sauer, *ICE presence threatens small business in Minneapolis and Minnesota, some owners say: 'I can hardly do my normal job'*, CNBC, (Jan. 28, 2026 at 3:47 PM EST), available at <https://www.cnbc.com/2026/01/28/ice-presence-threatens-small-business-in-minneapolis-minnesota-some-owners-say.html?msockid=0eb3e856c06162e82edbfea7c108638c>.

²² Dee DePass, *Immigrant corridors in both Minneapolis and St. Paul nearly shut down by intensifying ICE actions*, STAR TRIBUNE, (Jan. 13, 2026).

²³ Victor Stefanescu, *The ICE surge has disrupted business. Minnesota's top economic official is 'very concerned'*, STAR TRIBUNE, (Jan. 30, 2026).

²⁴ Dee DePass, *Immigrant corridors in both Minneapolis and St. Paul nearly shut down by intensifying ICE actions*, *supra*, at n.22.

²⁵ Dustin Nelson, *John Mulaney postpones three-night stand in Minneapolis*, BRING ME THE NEWS, (Jan. 8, 2026), available at <https://bringmethenews.com/minnesota-lifestyle/john-mulaney-cancels-three-night-stand-in-minneapolis>.

Anniversary Celebration scheduled for Friday, January 23,²⁶ and An Opera Theatre postponed its production scheduled for January 23-26 at Nautilus Music Theater in St. Paul “for the safety and well-being of [its] staff, cast, crew and audiences.”²⁷

Economic leaders are concerned about the long-term impact of DHS’ operations in Minnesota. Bill George, the former CEO of Medtronic, who served on the boards of directors of Target Corporation, Novartis, ExxonMobil, Mayo Clinic, and Goldman Sachs, and a former professor at the Harvard Business School, opined that the surge in federal officers in Minnesota “is certainly not helping growth, jobs or innovation in’ Minnesota.”²⁸ Matt Varilek, the commissioner of the Minnesota Department of Employment and Economic Development, is also concerned that while Minnesota is a target for federal actions, businesses will likely be dissuaded from expanding into the State.²⁹ While the full negative economic impact of the ICE surges cannot yet be calculated, the

²⁶ The Current, <https://www.thecurrent.org/events/20260123-the-current-anniversary-party-brigitte-calls-me-baby-joseph-first-avenue-minneapolis> (last visited Feb. 3, 2026).

²⁷ An Opera Theatre Production Page, available at <https://anoperatheatre.org/productions> (last visited Feb. 3, 2026).

²⁸ Victor Stefanescu, *Minnesota’s biggest companies starting to feel heat from ICE surge*, STAR TRIBUNE, Jan. 14, 2026, available at <https://www.startribune.com/minnesotas-biggest-companies-starting-to-feel-heat-from-ice-surge/601562852>.

²⁹ Stefanescu, *The ICE surge has disrupted business. Minnesota’s top economic official is ‘very concerned’*, *supra*, at n.23.

consequences will be felt for years and will likely harm all of Minnesota, and therefore the public interest favors granting a preliminary injunction.

II. IMPACT ON SCHOOLS

Operation PARRIS and its associated implementation through Operation Metro Surge has had a devastating impact on Minnesota's educational system. As a result of Defendants' aggressive and unlawful immigration enforcement, countless students in Minnesota – including students who are refugees – are afraid to attend school, leading to a precipitous decline in student attendance and lost learning opportunities.³⁰ Schools throughout Minnesota have had to cancel classes, rapidly transition to providing remote learning options, and respond to immigration enforcement activities taking place on school property.³¹

The impact on student attendance has been profound. As an example, during a two-week period in January "when ICE enforcement activity was highest," the Rochester Public Schools saw "an 81 percent increase in excused absences among all students" when compared to the prior month.³² Among

³⁰ See *Educators Warn of Impact of ICE Surge at Schools*, FOX 9 (Jan. 27, 2026, 3:31 PM), <https://www.fox9.com/video/fmc-7dyrvn0baj0e9vvm>.

³¹ Elizabeth Shockman, *Kids, Staff, Parents Detained: How Federal Activity in Minnesota is Affecting Schools and Students*, MPR News (Jan. 23, 2026, 4:00 AM), <https://www.mprnews.org/story/2026/01/23/how-schools-and-students-are-affected-by-ice-enforcement>.

³² Emily Bright, *Educators Warn of the Negative Effects of ICE on Student Learning*, MPR News (Jan. 28, 2026, 1:22 PM),

particular groups of students, this drop in attendance was especially acute – excused absences rose by a staggering 417% among students whose first language is not English, 376% among Latino students, 116% among students from low-income families, and 68% among Asian American students.³³ The superintendent of Rochester Public Schools, Dr. Kent Pekel, has also reported “significant decreases” in attendance at both early childhood and adult education programs in Rochester.³⁴

Other school districts across Minnesota have seen similar decreases in attendance and experienced widespread disruptions to the educational programming they provide. In districts “with widespread federal activity, as many as 20 to 40 percent of students have been absent in recent weeks.”³⁵ 560 Willmar Public Schools students were absent on December 15, 2026, following “rumors of

<https://www.mprnews.org/story/2026/01/28/educators-warn-ice-enforcement-is-negatively-affecting-student-learning>.

³³ Emily Bright, *Educators Warn of the Negative Effects of ICE on Student Learning*, MPR News (Jan. 28, 2026, 1:22 PM), <https://www.mprnews.org/story/2026/01/28/educators-warn-ice-enforcement-is-negatively-affecting-student-learning>; *Educators Warn of Impact of ICE Surge at Schools*, FOX 9 (Jan. 27, 2026, 3:31 PM), <https://www.fox9.com/video/fmc-7dyrvn0baj0e9vvm>.

³⁴ *Educators Warn of Impact of ICE Surge at Schools*, FOX 9 (Jan. 27, 2026, 3:31 PM), <https://www.fox9.com/video/fmc-7dyrvn0baj0e9vvm>.

³⁵ Elizabeth Shockman, *Kids, Staff, Parents Detained: How Federal Activity in Minnesota is Affecting Schools and Students*, MPR NEWS (Jan. 23, 2026, 4:00 AM), <https://www.mprnews.org/story/2026/01/23/how-schools-and-students-are-affected-by-ice-enforcement>.

a federal immigration operation” in the area.³⁶ More than one-third of Fridley Public School students were absent on January 8, 2026 – the day after Renee Good was killed by an ICE agent in Minneapolis.³⁷ And “[a]bout half of Spanish-speaking students in St. Paul and a quarter of Somali-speaking students were absent from school” on January 9, 2026.³⁸ These statistics align with research demonstrating how Operation Return to Sender, a recent immigration enforcement campaign in California’s Central Valley, “significantly increased student absences from school.”³⁹

Both Minneapolis and St. Paul Public Schools were also closed for multiple days last month “in response to concerns about student safety and to allow time for teachers to transition large numbers of students to online learning.”⁴⁰ Numerous

³⁶ Elizabeth Shockman, *ICE Rumors Cause Hundreds to Miss School in Willmar*, MPR News (Dec. 19, 2025, 1:52 PM), <https://www.mprnews.org/story/2025/12/19/ice-rumors-cause-hundreds-to-miss-school-in-willmar-minnesota>.

³⁷ *Educators Warn of Impact of ICE Surge at Schools*, *supra*, at n.34

³⁸ Sarah Mervosh, *Minneapolis Schools Allow Students to Learn Online Amid ICE Fears*, N.Y. TIMES (Jan. 15, 2026), <https://www.nytimes.com/2026/01/15/us/minneapolis-schools-online-learning-ice.html>.

³⁹ Thomas S. Dee, *Recent Immigration Raids Increased Student Absences*, EdWorkingPapers (June 2025), <https://edworkingpapers.com/sites/default/files/ai25-1202.pdf>.

⁴⁰ Elizabeth Shockman, *Kids, Staff, Parents Detained: How Federal Activity in Minnesota is Affecting Schools and Students*, MPR News (Jan. 23, 2026, 4:00 AM), <https://www.mprnews.org/story/2026/01/23/how-schools-and-students-are-affected-by-ice-enforcement>.

school districts – including Minneapolis, St. Paul, Fridley, Richfield, Robbinsdale, and Independent School District 196 – are now allowing students to attend school remotely.⁴¹ Over 7,000 students have chosen to attend school virtually in St. Paul alone.⁴² The University of Minnesota is also offering online learning options to students at its Twin Cities campus “who feel unsafe coming to class amid concerns about Immigration and Customs Enforcement agents’ presence in the Twin Cities.”⁴³ While such remote learning options have helped many students continue to attend class, research from the COVID-19 pandemic shows that students who attended school virtually reported more mental health problems and a larger drop in overall grades when compared to students who attended school in-person.⁴⁴

⁴¹ Howard Thompson, *Minnesota School Districts Offering Online Learning Amid ICE Surge Concerns*, FOX 9 (Jan. 18, 2026, 4:35 PM), <https://www.fox9.com/news/minnesota-school-districts-offering-online-learning-amid-ice-surge-concerns>.

⁴² Mara Klecker & Anthony Lonetree, *Minnesota Schools in ‘Crisis Mode’ Scramble to Support Students Amid ICE Surge*, STAR TRIBUNE (Jan. 30, 2026, 6:00 AM), <https://www.startribune.com/minnesota-schools-in-crisis-mode-scramble-to-support-students-amid-ice-surge/601571201>.

⁴³ Erin Adler, *University of Minnesota Offers Online Classes for Students Who Feel Unsafe Amid ICE Surge*, STAR TRIBUNE (Jan. 16, 2026, 6:23 PM), <https://www.startribune.com/university-of-minnesota-offers-online-classes-for-students-who-feel-unsafe-amid-ice-surge/601565714>.

⁴⁴ Drew P. Cingel et al., *U.S. Adolescents’ Attitudes Toward School, Social Connection, Media Use, and Mental Health During the COVID-19 Pandemic: Differences as a Function of Gender Identity and School Context*, PLOS ONE, Oct. 27, 2022, at 12.

The impacts of Operation PARRIS and Operation Metro Surge have extended beyond school closures, increased absenteeism, or the transition of thousands of students to remote learning. Border Patrol agents came on to school property at Roosevelt High School in Minneapolis where they “began tackling people, handcuffed two staff members, and released chemical weapons on bystanders.”⁴⁵ Federal agents have stopped school vehicles transporting children and staff from both St. Paul Public Schools and the Anoka-Hennepin School District.⁴⁶ School leaders in Roseville decided “to lock down building doors” after “federal agents used school parking lots for staging their enforcement activities.”⁴⁷ And six students from Columbia Heights Public Schools have been detained, including a 5-year-old boy, a pair of brothers in second and fifth grade, and a ten-year-old girl.⁴⁸ Such actions can have long-term impacts on students and staff, with research

⁴⁵ Elizabeth Shockman, *Minneapolis Schools Cancel Classes After Border Patrol Clash Disrupts Dismissal at Roosevelt*, MPR News (Jan. 8, 2026, 4:00 AM), <https://www.mprnews.org/story/2026/01/08/after-border-patrol-clash-at-roosevelt-minneapolis-schools-cancel-classes>.

⁴⁶ Shockman, *Kids, Staff, Parents Detained: How Federal Activity in Minnesota is Affecting Schools and Students*, *supra*, at n.40.

⁴⁷ *Id.*

⁴⁸ Becky Z. Dernbach, *Columbia Heights Fourth-Grader and Her Mother Released from ICE Detention After School Officials Call Attention to Her Case*, SAHAN JOURNAL (Feb. 3, 2026), <https://sahanjournal.com/education/columbia-heights-fourth-grader-held-by-ice/>.

supporting that mere exposure to immigration enforcement may have negative effects on mental health, regardless of citizenship status.⁴⁹

As Dr. Pekel explained, the “indiscriminate nature” of the recent immigration enforcement activity in Minnesota “has created widespread fear,” leading families to keep students of all ages home from school.⁵⁰ Dr. Brenda Lewis, the superintendent of Fridley Public Schools, similarly reported that “the increased presence of ICE and federal enforcement in and around [] neighborhoods and schools has created an environment of fear and uncertainty that [she] has never seen in [her] 26 years in education.”⁵¹ This climate of fear harms the educational experience of all Minnesota students – “students who stay home lose access to learning and support,” while “students who continue to attend school lose classmates, relationships, and the richness that comes from learning alongside peers from different backgrounds.” It also impedes the State’s ability to provide “a general and uniform system of public schools” as required by the Article XIII, section 1 of the Minnesota Constitution. In light of these catastrophic impacts on Minnesota’s students and schools, the public interest favors granting preliminary

⁴⁹ Miguel Pinedo & Carmen R. Valdez, *Immigration Enforcement Policies and the Mental Health of US-Citizens: Findings from a Comparative Analysis*, Am. J. of Cmty. Psychology, at 7-9 (Sept. 2020), <https://pmc.ncbi.nlm.nih.gov/articles/PMC7944641/pdf/nihms-1630045.pdf>.

⁵⁰ *Educators Warn of Impact of ICE Surge at Schools*, FOX 9 (Jan. 27, 2026, 3:31 PM), <https://www.fox9.com/video/fmc-7dyrvn0baj0e9vvm>.

⁵¹ *Id.*

relief. *See, e.g., Plyler v. Doe*, 457 U.S. 202, 221 (1982) (“The ‘American people have always regarded education and the acquisition of knowledge as matters of supreme importance.’” (quoting *Meyer v. Nebraska*, 262 U.S. 390, 400 (1923))).

III. IMPACT ON PUBLIC HEALTH

Minnesota refugees and other immigrant communities are also afraid to seek medical treatment out of fear of ICE raids at health care facilities. With ICE entering hospitals and detaining individuals, both with and without warrants, people are avoiding medical offices.⁵² When people avoid medical care, doctors do not have the opportunity to prevent illness, administer vaccines, or provide life-saving care.⁵³ This puts all Minnesotans at risk—for instance, the ability to get vaccinated is critical to the health of everyone in the state, as vaccines are imperative to the prevention and control of infectious disease outbreaks.⁵⁴

⁵² Tim Sullivan and Claire Rush, *Doctors in Minnesota decry fear and chaos amid Trump administration’s immigration crackdown*, AP NEWS, (Jan. 20, 2026), <https://apnews.com/article/immigration-minneapolis-trump-crackdown-7ed3b62246d19ff4e6c5be8813415a83>.

⁵³ Liz Szabo, MA, *Minnesota residents delay medical care for fear of encountering ICE*, UNIV. OF MINNESOTA CTR. FOR INFECTIOUS DISEASE RSCH. & POL’Y, Jan. 16, 2026, <https://www.cidrap.umn.edu/influenza-general/minnesota-residents-delay-medical-care-fear-encountering-ice> (last visited Feb. 3, 2026).

⁵⁴ Vaccines and immunization overview, WORLD HEALTH ORGANIZATION [WHO], https://www.who.int/health-topics/vaccines-and-immunization/#tab=tab_1 (last visited Feb. 3, 2026); *see also* Devi Shastri, *Fear in Minnesota’s Somali community deepens, hampering progress on measles vaccination*, SAHAN JOURNAL, Feb. 6, 2026, <https://sahanjournal.com/health/ap-us-med-measles-vaccine-misinformation/>.

When people delay medical treatment, conditions can worsen and emergencies become more frequent.⁵⁵ Use of emergency rooms as primary healthcare strains the health system, both in terms of the services emergency rooms can provide, as well as creating economic burdens.⁵⁶ The Department of Homeland Security has itself acknowledged “that increased use of emergency rooms and emergent care as a method of primary healthcare due to delayed treatment is possible and there is a potential for increases in uncompensated care in which a treatment or service is not paid for by an insurer or patient.”⁵⁷ One Minnesota healthcare provider described conditions at hospitals right now, because of the ICE raids, as “more challenging than the most acute part of the pandemic in many ways.”⁵⁸

⁵⁵ Catharine Richert and Nikhil Kumaran, *How ICE’s presence is affecting health care in Minnesota*, MPR NEWS, (Jan. 28, 2026), <https://www.mprnews.org/episode/2026/01/27/how-ices-presence-is-affecting-health-care-in-minnesota>.

⁵⁶ See, e.g., Victoria Udalova et al., *Most Vulnerable More Likely to Depend on Emergency Rooms for Preventable Care*, U.S. CENSUS BUREAU, (Jan. 20, 2022), <https://www.census.gov/library/stories/2022/01/who-makes-more-preventable-visits-to-emergency-rooms.html> (last visited Feb. 3, 2026) (“Using emergency rooms for preventable care may generate excess costs for taxpayers, increase provider burden, and reduce the quality of patient care.”).

⁵⁷ Inadmissibility on Public Charge Grounds, 84 Fed. Reg. 41292, 41384 (Aug. 14, 2019) (to be codified at 8 C.F.R. pts. 103, 212, 213, 214, 245, and 248).

⁵⁸ ABC 6 News- KAAL TV, *Minnesota Physicians on ICE Presence in Hospitals*, at 20:36 (Jan. 20, 2026), <https://www.youtube.com/watch?v=kNXKBoNjCzM> (on file with ABC 6 News).

Additionally, the fear of ICE raids is not limited to patients. Hennepin Healthcare HCMC clinic staff report ICE officers have questioned their colleagues about where they are from, commenting on their accents, or making other racist remarks, all while staff were simply trying to do their jobs.⁵⁹ Dr. Janna Gerwirtz O'Brien, the president-elect of the Minnesota Chapter of the American Academy of Pediatrics and a physician in the Department of Pediatrics at Hennepin Healthcare, reported at a news conference that “half of our staff aren’t coming in at the hospital where I work. Our healthcare workforce is extremely diverse. The people taking care of our patients are Somali, they are Latina, and when we look at the nurses, the healthcare assistants, and the physicians, many of us are also from backgrounds that are actively being harmed by the campaign of racial profiling and hate that ICE is perpetrating.”⁶⁰ Notably, approximately 26% of physicians in Minnesota are immigrants.⁶¹

⁵⁹ Kent Erdahl, *HCMC doctors, staff protest ICE impact on hospital & patients*, KARE 11, (Jan. 23, 2026), <https://www.kare11.com/article/news/local/breaking-the-news/hcmc-doctors-staff-protest-ice-impact-hospital-patients/89-3696c23f-6afb-44ea-8e02-7286543dabdd>.

⁶⁰ ABC 6 News- KAAL TV, *Minnesota Physicians on ICE Presence in Hospitals*, at 30:01 (Jan. 20, 2026), <https://www.youtube.com/watch?v=kNXKBoNjCzM> (on file with ABC 6 News).

⁶¹ U.S. Census Bureau, [https://data.census.gov/app/mdata/ACSPUMS1Y2024/table?cv=CIT&rv=SOCP\(291210\)&nv=NAICSP,ucgid&wt=PWGTP&g=AwFm-BVBlAmB2IA](https://data.census.gov/app/mdata/ACSPUMS1Y2024/table?cv=CIT&rv=SOCP(291210)&nv=NAICSP,ucgid&wt=PWGTP&g=AwFm-BVBlAmB2IA) (last visited Feb. 3, 2026).

The health consequences to Minnesotans will only exacerbate the longer ICE engages in indiscriminate, violent, and warrantless raids. Even before Operation Metro Surge and Operation PARRIS, four in ten immigrant adults reported experiencing negative health impacts, “including increased stress, anxiety, or sadness; problems sleeping or eating; or worsening health conditions like diabetes or high blood pressure due to immigration-related related worries. Notably, nearly half (47%) of lawfully present immigrants...report at least one of these impacts.”⁶²

In addition to the plethora of anecdotal evidence, studies show that aggressive immigration enforcement tactics deter residents from seeking medical treatment.⁶³ That deterrence, in turn, impacts the broader health of the community because “[p]ublic health is served when individuals freely seek preventive care and do not stave off care until they need emergency room treatment in the midst of a health

⁶² Drishti Pillai et al., *KFF/N.Y. Times 2025 Survey of Immigrants: Health and Health Care Experiences During the Second Trump Administration*, KFF, (Nov. 18, 2025), <https://www.kff.org/immigrant-health/kff-new-york-times-2025-survey-of-immigrants-health-and-health-care-experiences-during-the-second-trump-administration/>.

⁶³ See, e.g., Sezer Kisa & Adnan Kisa, “*No Papers, No Treatment*”: *A Scoping Review of Challenges Faced by Undocumented Immigrants in Accessing Emergency Healthcare*, 23 Int’l J. for Equity in Health, no. 184, at 2, 6, 8 (2024); Scott D. Rhodes et al., *The Impact of Local Immigration Enforcement Policies on the Health of Immigrant Hispanics/Latinos in the United States*, 105 Am. J. Pub. Health 329, 332 (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.”).

crisis.” *Philadelphia v. Sessions*, 280 F. Supp. 3d 579, 609 (E.D. Pa. 2017), *subsequent judgment aff’d in relevant part*, 916 F.3d 276 (3d Cir. 2019).⁶⁴

IV. IMPACT ON CIVIC ENGAGEMENT

Operation PARRIS and Operation Metro Surge have also prevented refugees in Minnesota from participating in the fundamental activities of daily life, with many refugees in Minnesota now confined to their homes out of fear that they will be unlawfully arrested and detained. A refugee from Chad described the fear she is experiencing as “familiar,” stating that “[i]t reminds [her] of the war” in her home country. Another refugee reported that when ICE agents detained her son, who is also a refugee, she “relived th[e] same fear” she experienced in Venezuela, where “pro-government paramilitary groups act this way.”⁶⁵ As the executive director of the International Institute of Minnesota explained, Operation PARRIS and Defendants’ unlawful policy and practice of detaining refugees is “terrifying”

⁶⁴ See also, e.g., U.S. Dep’t of Health & Hum. Servs., <https://odphp.health.gov/healthypeople/objectives-and-data/browse-objectives/preventive-care> (last visited Feb. 6, 2026) (“Getting preventive care reduces the risk for diseases, disabilities, and death.”).

⁶⁵ Jennifer Ludden & Marisa Peñaloza, *Refugees Relive the Trauma They Fled as ICE Targets Them in Minnesota*, NPR (Feb. 2, 2026, 5:00 AM), <https://www.npr.org/2026/02/02/nx-s1-5686396/ice-arrest-refugees-legal-minneapolis-minnesota-immigration>.

refugee families, who have come to the United States “fle[e]ing] authoritarian regimes in their own countries.”⁶⁶

Operation PARRIS and Defendants’ unlawful detention policy has severely chilled the ability of refugees in Minnesota to participate in daily life. A refugee family in Minneapolis reported that their “fear has become so overwhelming” that they covered all their windows, “stopped going to work” and “stopped leaving their home altogether.”⁶⁷ Another refugee living in St. Cloud was “unable to leave her apartment since the arrest of refugees,” and stated that she was “heartbroken” and “d[id]n’t know what to do.”⁶⁸ Some immigrant parents have stopped allowing their children to play outside, telling them that “it’s not safe.”⁶⁹ Many refugees and immigrants across Minnesota have switched to relying on deliveries of

⁶⁶ Sarah Thamer, *Resettlement Agency Head Says New Homeland Security Operation ‘Terrifying’ Refugee Families*, MPR News (Jan. 13, 2026)

⁶⁷ Sarah Thamer, *Trapped Inside: A Minnesota Refugee Family’s Life on Hold Amid ICE Arrests*, MPR News (Jan. 29, 2026, 11:58 AM), <https://www.mprnews.org/story/2026/01/29/trapped-inside-a-minnesota-refugee-familys-life-on-hold-amid-ice-arrests>.

⁶⁸ Katelyn Vue & Mohamud Farah, *New Federal Operation Targets Minnesota Refugees With Legal Status*, SAHAN JOURNAL (Jan. 21, 2026), <https://sahanjournal.com/immigration/minnesota-refugees-immigration-operation-parris/>.

⁶⁹ Meg Anderson, *The ICE Surge is Fueling Fear and Anxiety Among Twin Cities Children*, NPR (Jan. 22, 2026, 4:01 AM), <https://www.npr.org/2026/01/22/nx-s1-5676035/minneapolis-ice-fear-anxiety-children>.

groceries and other items, rather than risk going out to shop themselves.⁷⁰ In greater Minnesota, the executive director of the Ethnic Self-Help Alliance for Refugee Assistance reported that “[p]eople are not coming to the office,” describing the last few weeks as “very challenging” for his organization’s work.⁷¹ And immigrants have chosen to stay home from religious services during Operation Metro Surge.⁷² Preliminary relief is in the public interest, as the disappearance of refugees from daily life has severely harmed schools, businesses, and communities throughout the state, as well as inflicted lasting trauma on refugees and their families.⁷³

V. IMPACT ON LAW ENFORCEMENT

The authority and duty to enforce its own legal codes is integral to state sovereignty. *See, e.g., Alfred L. Snapp & Son, Inc. v. Puerto Rico ex rel. Barez*, 458 U.S. 592, 601 (1982). Operation PARRIS and Operation Metro Surge, and the

⁷⁰ *See, e.g.*, Sarah Thamer, *Trapped Inside: A Minnesota Refugee Family’s Life on Hold Amid ICE Arrests*, *supra*, at n.67.

⁷¹ Noah Block, *Some Immigrants in Minnesota Fear Leaving Their Homes*, MPR News (Feb. 3, 2026, 4:00 AM), <https://www.mprnews.org/story/2026/02/03/some-immigrants-in-greater-minnesota-fear-leaving-their-homes>.

⁷² James Walsh & JP Lawrence, *Minnesota Refugees and Immigrants are Hiding in ‘a Prison of Fear’*, STAR TRIBUNE, (Feb. 5, 2026), <https://www.startribune.com/minnesota-refugees-and-immigrants-are-hiding-in-a-prison-of-fear/601571791>.

⁷³ Kao Kalia Yang, *Letter from Minnesota: “If They Take Me and Leave the Children . . .”*, LITERARY HUB (Jan. 28, 2026), <https://lithub.com/letter-from-minnesota-if-they-take-me-and-leave-the-children/>.

methods by which they are being implemented interfere with local law enforcement's operations.⁷⁴ Both the Minneapolis and St. Paul police departments have been forced to allocate resources to responding to ICE-related 911 calls rather than their normal duties of preventing crime and enforcing local criminal laws.⁷⁵ Police departments are spending significant funds paying overtime for police officers.⁷⁶ Law enforcement officials in rural Minnesota have also expressed frustration with ICE operations due to the lack of communication and transparency from federal authorities.⁷⁷

DHS agents' unlawful actions—undertaken while wearing masks or in plainclothes—also erode the relationship between Minnesota residents and local law enforcement.⁷⁸ Plaintiffs provided multiple examples of agents arresting and detaining refugees while masked, or while hiding their identities, including masked

⁷⁴ *State of Minnesota, et al. v. Noem, et al.*, Case No. 0:26-cv-00190-KMM-DJF, Compl., ¶¶ 107-133, Dkt. No. 1.

⁷⁵ *Id.* at ¶¶ 110, 125.

⁷⁶ *Id.* at ¶ 113.

⁷⁷ Hannah Yang, *Immigration enforcement in rural Minnesota spreads fear, strains local leaders*, MPR NEWS, (Jan. 28, 2026), <https://www.mprnews.org/story/2026/01/28/ice-in-greater-minnesota-mankato-spreads-fear>.

⁷⁸ *State of Minnesota, et al. v. Noem, et al.*, Case No. 0:26-cv-00190-KMM-DJF, Compl. ¶ 142, Dkt. No. 1; See, e.g., Shaila Dwan, 'It's All Just Going Down the Toilet': Police Chiefs Fume at ICE Tactics, N.Y. TIMES, (Jan. 30, 2026), <https://www.nytimes.com/2026/01/30/us/its-all-just-going-down-the-toilet-police-chiefs-fume-at-ice-tactics.html>.

DHS agents pulling over U.H.A. while they were driving to work⁷⁹ and armed plainclothes officers arresting D. Doe at their home.⁸⁰ The perpetual hiding of agents' faces and identities while agents are stopping people at their homes, in their cars, or at work and arresting people with no warrant, creates chaos and confusion, burdening local law enforcement and damaging relationships with local communities.

Lack of trust between state and local law enforcement and residents lessens the safety of Minnesota's communities. Immigrants without legal status are already less likely to report crime out of fear that law enforcement will ask them about their immigration status, even if they are the victim of a crime.⁸¹ Some local law enforcement agencies expressed concerns that undocumented residents will be less likely to call 911 to report a crime due to immigration fears.⁸² Even before

⁷⁹ *U.H.A., et al. v. Noem, et al.*, Case No. 0:26-cv-417-JRT-DLM, Compl., ¶¶ 15, 110, Dkt. No. 12.

⁸⁰ *Id.* at ¶¶ 18, 113.

⁸¹ E.g., Nik Theodore, *Insecure Communities: Latino Perceptions of Police Involvement in Immigration Enforcement*, Univ. of Ill. at Chi. 1, 6 (May 2013), available at <https://www.vawnet.org/sites/default/files/assets/files/2016-10/InsecureCommunities.pdf>; see also *id.* at 6 ("Among US-born Latinos [i.e., citizens], 29 percent reported they are less likely to voluntarily offer information about crimes they know have been committed, and 26 percent indicated they are less likely to report a crime, because they fear that police will ask them or someone they know about their immigration status . . . or [that] of people they know.").

⁸² See, e.g., Katrina Pross, *ICE arrests target immigrants at Hennepin County courthouse, causing 'immense' anxiety*, SAHAN JOURNAL, (Jan. 28, 2025), <https://sahanjournal.com/public-safety/ice-arrests-minneapolis-hennepin-county-courthouse/>; Jaclyn Diaz, *Events in Minneapolis show how immigration*

Operation PARRIS and Operation Metro Surge, victims and witnesses of crimes expressed fear of attending court proceedings at the Hennepin County Courthouse out of fear that ICE may be present and detain them.⁸³ This fear has likely only increased, as local authorities in Hennepin County report federal agents are arresting immigrants reporting to court and potentially impacting the criminal justice system.⁸⁴ Defendants' unlawful practices have not only created a culture of fear that has disrupted community life but have also impeded the operations of local law enforcement.

CONCLUSION

For the reasons discussed above, the public interest counsels in favor of preliminary relief. The State of Minnesota urges the Court to grant the requested injunctive relief.

Dated: February 6, 2026

Respectfully submitted,

enforcement has changed. What's the impact?, NPR, (Jan. 17, 2026, 5:00 a.m. ET), <https://www.npr.org/2026/01/17/nx-s1-5676240/minneapolis-immigration-enforcement-tactics>.

⁸³ Katrina Pross, *'It makes us...less safe; ' How federal immigration actions are affecting local prosecutions in Hennepin County*, SAHAN JOURNAL, (Aug. 18, 2025), <https://sahanjournal.com/public-safety/immigration-arrests-impact-hennepin-county-court-cases/>.

⁸⁴ Pross, *ICE arrests target immigrants at Hennepin County courthouse, causing 'immense' anxiety*, *supra*, at n.82; Jeff Day, *Chief public defender outraged by immigration detainments inside Hennepin County courthouse*, STAR TRIBUNE, (Feb. 5, 2026), <https://www.startribune.com/chief-public-defender-outraged-by-immigration-detainments-inside-hennepin-county-courthouse/601577299>.

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