



What is Under Review at the Supreme Court

Summary of Filings in *Perdomo v. United States* now before SCOTUS

This memo summarizes the key filings in the Supreme Court proceedings concerning the Perdomo case, which challenges immigration enforcement stops based solely on race, language, location, or job type within the Central District of California. It outlines the government's request for a stay of the district court's Temporary Restraining Order (TRO), the plaintiffs' opposition, the government's reply, and the two amicus briefs.

1. Government's Stay Application - Filed by DOJ/DHS, August 7, 2025

The Department of Justice and Department of Homeland Security filed the stay application on August 7, 2025. They request the Supreme Court pause the district court's Temporary Restraining Order (TRO), which bars immigration stops based solely on race or ethnicity, speaking Spanish or accented English, being in certain public locations, and working in certain occupations like day labor. The government argues that this order exceeds judicial authority, improperly limits lawful enforcement, and will cause irreparable harm by restricting officers' discretion. They also cite the Ninth Circuit's refusal to stay the TRO as an error, claiming the appellate court overlooked the TRO's potential impact on national enforcement priorities.

2. Plaintiffs' Opposition to Stay - Filed by Perdomo et al., August 12, 2025

The plaintiffs, (LAWCN and Others) filed their opposition on August 12, 2025. They argue the TRO aligns with established Fourth Amendment precedent, including *United States v. Brignoni-Ponce*, which prohibits stops based solely on broad demographic traits. They assert standing through repeated unlawful stops and a demonstrable risk of recurrence, supported by sworn declarations. They stress that the TRO applies only in the Central District and still allows enforcement when other objective facts are present. They also emphasize that the district court found the government's own records corroborated the discriminatory practices, further justifying the need for immediate relief.

3. Government's Reply in Support of Stay - Filed by DOJ/DHS, August 13, 2025

The government filed its reply on August 13, 2025, maintaining that plaintiffs' fears of future harm are speculative in a district with over 20 million residents and relatively few arrests. They argue the TRO wrongly creates a categorical rule excluding the four listed factors, contrary to the Fourth Amendment's totality-of-the-circumstances analysis. The

reply cites *City of Los Angeles v. Lyons* to argue that mere allegations of a policy are insufficient for standing without a near certainty of recurrence. The government also adds that the TRO exposes agents to contempt risk for legitimate enforcement decisions, which could undermine morale and operational readiness.

4. Los Angeles Amicus Brief - Filed by the City of Los Angeles and Allied Local Governments, August 12, 2025

The City of Los Angeles, joined by other local governments in the Central District, filed an amicus brief on August 12, 2025, supporting the plaintiffs. They argue that profiling raids cause fear among all residents, lawful or not, and erode trust in public institutions. They highlight how community members avoid public services, schools, and workplaces after such raids, weakening public safety and local economies. The brief stresses that local police lose cooperation from witnesses and victims when communities associate law enforcement with discriminatory federal actions. It also points to data showing economic harm from disrupted workplaces and emphasizes that a district-wide TRO is necessary because agents cannot practically identify plaintiffs during operations.

5. FAIR Amicus Brief - Filed by the Federation for American Immigration Reform, August 12, 2025

The Federation for American Immigration Reform (FAIR) filed an amicus brief on August 12, 2025, supporting the government's stay request. FAIR asserts that reasonable suspicion is a deliberately low standard and that the four factors in the TRO can be lawfully considered in combination with other facts. They argue that excluding these factors categorically ignores their potential probative value, especially in high-traffic areas known for unauthorized entry. The brief also contends that the TRO sets an unrealistic evidentiary burden on agents, effectively barring timely enforcement and creating enforcement blind spots.

** The Southern Poverty Law Center designates FAIR as a hate group due to its rhetoric and ties to white supremacist groups*

6. Comparative Summary of Arguments

Pro-TRO positions, represented by the plaintiffs and the City of Los Angeles, focus on preventing unconstitutional stops, protecting community trust, and reducing harm to individuals and local governance. They view the TRO as narrowly tailored, grounded in precedent, and critical to safeguarding rights.

Anti-TRO positions, advanced by the government and FAIR, stress the need for flexible enforcement, argue that the TRO is overbroad and speculative in its harm assessment, and warn it could reduce enforcement effectiveness. Both sides frame their arguments in terms of constitutional authority and operational necessity, but they diverge sharply on how the Fourth Amendment applies to the factors listed in the TRO.

Conclusion and Next Steps

A decision from the Supreme Court on the government's stay request is likely within the next few days. All worker centers should immediately prepare for the possibility that the Department of Homeland Security will be granted the stay, which would allow ICE to resume raids and other enforcement actions in our communities.

Additional Resources:

Legal Services for Immigrants

There are several excellent *Know Your Rights* (KYR) resources available. We recommend that each center review these and add them to your existing resources if they are not already included.

One key recommendation is the **Immigrant Legal Resource Center (ILRC)** *Know Your Rights* page. This page provides clear, multilingual resources to help immigrants understand their legal rights when interacting with immigration enforcement. It includes downloadable fact sheets, videos, and guides on topics such as interacting with ICE, preparing a family safety plan, and finding legal help. These materials are designed for both individuals and community organizations to share and use in trainings, ensuring that immigrants are informed, prepared, and empowered to assert their rights.

Website: www.ilrc.org/community-resources/know-your-rights

Additional Local Nonprofit Legal Organizations and Resources

- **Esperanza Immigrant Rights Project**
Offers free legal representation and education for vulnerable immigrants, with a focus on children and families.
Website: esperanza-la.org
- **Immigrant Defenders Law Center** – Deportation defense (detained and non-detained).
Website: <https://www.immdef.org/>
- **Legal Aid Foundation of Los Angeles (LAFLA) – East Los Angeles Office**
Provides free legal help for low-income immigrants, including asylum, DACA, family petitions, naturalization, removal hearings, VAWA, and T and U visas. Services are available in multiple languages.
Website: lafla.org
- **International Institute of Los Angeles (IILA)**
Offers immigration legal assistance, refugee resettlement, and social services for immigrants and refugees.
Website: iilosangeles.org
- **Los Angeles LGBT Center – Immigrant Legal Services**
Provides legal consultations, court representation, asylum, family petitions, and

removal defense for LGBTQ+ immigrants.

Website: lgbtcenter.org/services/legal-services/immigrant-legal-services

- **CHIRLA (Coalition for Humane Immigrant Rights of Los Angeles)**
Delivers legal services, know-your-rights training, advocacy, and rapid response support for immigrants.
Address: 2533 West 3rd Street, Los Angeles, CA 90057
Phone: (213) 353-1333
Website: chirla.org

Legal Clinics and Pro Bono Services

- **Immigration Legal Assistance Project (ILAP) – Los Angeles County Bar Association (LACBA)**
Walk-in legal assistance for low-income immigrants at no or low cost.
Location: 300 N. Los Angeles Street, Room 3107, Los Angeles, CA 90012
Hours: Monday–Friday, 8:00 am–12:00 pm and 1:00 pm–3:00 pm
Website: lacba.org
- **UCLA Civil Rights Project – Immigration Legal Assistance Project**
Legal assistance and counseling for low-income immigrants, sometimes for a small fee.
Website: civilrightsproject.ucla.edu/resources/community-tools/immigration
- **USC Gould Immigration Clinic**
Free legal representation and confidential consultations for adults and children in various immigration matters, including asylum, removal defense, and humanitarian relief.
Email: iclinic@law.usc.edu
- **Kids in Need of Defense (KIND)**
Legal representation and support for unaccompanied immigrant and refugee children.
Email: info@losangeles@supportkind.org
- **Immigrant Defenders Law Center**
Holistic legal defense and advocacy for immigrants facing deportation, with services for both detained and non-detained adults and children.
Email: info@immdef.org
- **EI Rescate**
Legal services, advocacy, and community education for immigrants and refugees, with a focus on Central American and Latino communities.
Email: info@elrescate.org
- **Central American Resource Center of California (CARECEN)**
Legal representation, policy advocacy, and community empowerment programs for Central American and immigrant families in Los Angeles.
Email: info@carecen-la.org

Hotlines and Rapid Response

- **CHIRLA Rapid Response Hotline** – Immediate support and guidance during immigration enforcement actions.
Phone: (888) 624-4752 or (213) 201-8773
- **Southern California Rapid Response Network** – Rapid response support for immigrants in crisis.
Phone: (888) 624-4752
- **ACLU of Southern California Immigration Hotline** – Legal support and information for immigrants.
Phone: (213) 201-3773