City of Sebastopol

CITY OF SEBASTOPOL CITY COUNCIL
AGENDA ITEM REPORT FOR MEETING OF: ~~October 6, 2026~~ Continuation from October 6, 2026 City Council Meeting

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To:	Honorable Mayor and City Councilmembers
From:	Councilmember Zollman
Responsible Department:	City Attorney's Office
Subject:	Evaluation of Local Law Enforcement Practices Regarding Collaboration with U.S. Immigration and Customs Enforcement (ICE)

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RECOMMENDATION(s):

That the City Council consider Councilmember Zollman's request to direct the City Attorney to review recommendations from the Gault Center / Center for Juvenile Justice (CfJJ) training resources regarding local law enforcement practices and collaboration with U.S. Immigration and Customs Enforcement (ICE). and the City's current Police Department policies, and report back to the Council about necessary changes to make the City's policies consistent with the recommendations. The direction also includes reporting back on the City's youth diversion statistics.

PROCESS OF AGENDA ITEM:

1. Presentation by Requestor (Councilmember Zollman)
2. Council questions and discussion
3. Public comment
4. Council deliberation and action

EXECUTIVE SUMMARY:

Councilmember Zollman has requested that the City Council direct staff to review local law enforcement practices, policies, and training related to interactions with U.S. Immigration and Customs Enforcement (ICE), particularly as they affect youth, and to review those policies against recommendations from the Gault Center / Center for Juvenile Justice (CfJJ) training resources. The request stems from a concern that even minor youth offenses, such as theft or vandalism, can result in ICE involvement through the fingerprinting process at the time of arrest, even when the matter is ultimately diverted out of the formal justice system through Restorative Justice or another youth diversion program. This item asks the Council to direct the City Attorney to review training recommendations from the Gault Center / Center for Juvenile Justice (CfJJ) and report back to the Council about necessary changes to make the City's policies consistent with the recommendations. The direction also includes reporting back on the City's youth diversion statistics.

BACKGROUND:

Councilmember Zollman has raised concerns regarding the intersection of local law enforcement practices and federal immigration enforcement as they relate to youth. Under current fingerprinting practices, a youth who is arrested for even a minor offense, such as petty theft or vandalism, may have their fingerprints shared with federal authorities in a manner that can lead to ICE involvement, even in cases where the youth is subsequently diverted out of the formal justice system through Restorative Justice or another youth diversion program.

This item requests that the City Council allocate staff time for the City Attorney to review recommendations from the Gault Center / Center for Juvenile Justice (CfJJ) training resources related to this issue and the City's current police department policies, and report back to the Council about necessary changes to make the City's policies consistent with the recommendations. Councilmember Zollman has also requested that the City Attorney review the City's current LexiPol policy, the related local implementation and training provided to law enforcement staff, and current youth diversion statistics.

The templates for the City's Police Department policies are provided by Lexipol, although changes may be made before the policy is adopted by the Department. Lexipol is an associated vendor with the City's Risk Management Agency (California Intergovernmental Risk Authority (CIRA) the leading provider of policy management for law enforcement (police) and fire agencies. Lexipol's Daily Training Bulletins (DTBs) bring the policy manual into practice through real-life, scenario-based training exercises emphasizing high-risk, low-frequency events. Completed and verified in less than ten minutes per day, DTBs often qualify for continuous training certification. CIRA subsidizes members' subscriptions to Lexipol for both law enforcement and fire operations, including annual policy manual maintenance and DTBs.

Understanding how police department policies intersect with federal immigration enforcement and recommendations from the Gault Center / Center for Juvenile Justice (CfJJ) will help inform whether any changes to local policy, training, or practice may be appropriate.

DISCUSSION:

Councilmember Zollman has noted that this concern applies broadly to youth who come into contact with law enforcement for minor offenses, even where the ultimate outcome is diversion rather than formal prosecution. He is requesting that the Council approve the allocation of City Attorney staff time to review the recommendations described above and report findings back to the Council.

The City Attorney's review would include: (1) recommendations from the Gault Center / Center for Juvenile Justice (CfJJ) training resources; (2) the City's current LexiPol policy and related local implementation and training; and (3) gathering the City's youth diversion statistics. Staff time required for this initial review is estimated at approximately 10 hours.

If the Council approves this item and directs staff to move forward, additional staff time may be required for further research; the amount of any additional time, and the specific staff work requested, would be determined based on the outcome of the initial review. City Attorney will return to the Council for additional authorization if the amount of hours go beyond the hours approved.

STAFF ANALYSIS:

This item would require City Attorney staff time to review the Gault Center / CfJJ training recommendations, LexiPol policy and related local implementation and training; and currently estimated at approximately 10 hours. Additional staff time may be required if the Council directs further research following this initial review.

CITY COUNCIL GOALS/PRIORITIES AND GENERAL PLAN CONSISTENCY:

This agenda item represents the City Council goals/priorities as follows:

Goal: Community Safety and Youth Well-Being

Reviewing local law enforcement practices, policies, and training to help ensure that responses to minor youth offenses are consistent with the City's commitment to youth well-being and community trust.

PUBLIC COMMENT:

As of the writing of this staff report, the City has not received any public comment. However, if staff receives public comment from interested parties following the publication and distribution of this staff report, such comments will be provided to the City Council as supplemental materials before or at the meeting. In addition, public comments may be offered during the public comment portion of the agenda item.

PUBLIC NOTICE:

This item was noticed in accordance with the Ralph M. Brown Act and was available for public viewing and review at least 72 hours prior to the scheduled meeting date.

FISCAL IMPACT:

There is no direct fiscal impact associated with this action beyond the cost of existing City Attorney staff time described above. No additional City funding, such as consultant hours, is anticipated at this time.

RESTATED RECOMMENDATION:

That the City Council consider Councilmember Zollman's request and provide direction on the following:

OPTIONS:

1. Approve the request: direct the City Attorney to review recommendations from the Gault Center / Center for Juvenile Justice (CfJJ) training resources, the City's current LexiPol policy and related local implementation and training, and report findings back to the Council. The direction also includes reporting back on the City's youth diversion statistics.
2. Approve the request with modifications (e.g., a different scope, timeline, or scope of review), and direct staff accordingly.
3. Take no action at this time.

ATTACHMENTS:

1. Mapping and Resisting Local Law Enforcement Collusion with ICE in Massachusetts
2. An Advocate's Toolkit for Analyzing Immigration Enforcement Policies and Pushing Local Leaders for Change
3. Lexipol Document; Sebastopol Police Policy Manual
4. City of Sebastopol Communications Protocol: ICE Activity and/or any other Federal Officials engaged In Immigration Enforcement, Notification and Response

APPROVALS:

Department Head Approval: Approval Date: 10/01/2026
CEQA Determination (Planning): Approval Date: 10/01/2026
The proposed action is not a project under the California Environmental Quality Act (CEQA)
Administrative Services (Financial) Approval Date: 10/01/2026
Costs authorized in City Approved Budget: N/A – staff time only; no additional appropriation requested at this time
City Attorney Approval: Approval Date: 10/01/2026
City Manager Approval: Approval Date: 10/01/2026

ICE OUT

Mapping and Resisting Local Law Enforcement Collusion with ICE in Massachusetts

April 2026

Citizens for Juvenile Justice

ICE OUT

Mapping and Resisting Local Law Enforcement Collusion with ICE in Massachusetts

April 2026

ICE OUT: Mapping and Resisting Local Law Enforcement Collusion with ICE in Massachusetts

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Recommendation 5: The Trial Court should pass its own rules to not allow ICE into court buildings and prohibit information sharing from its employees to ICE. 41

Recommendation 6: The Governor should cancel the one 287(g) agreement in the state between the MA DOC and ICE. 41

Recommendation 7: Municipalities and County Sheriffs should set clear guidelines to limit surveillance and information sharing with ICE through City Ordinance, Executive Order, and Police Policy. 42

Recommendation 8: The AGO and POST Commission should expand accountability and oversight for law enforcement playing too nice with ICE. 42

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EXECUTIVE SUMMARY

In the context of aggressive federal immigration enforcement that has shifted away from the border and into our communities, this report examines the role that Massachusetts local law enforcement and justice actors play in federal Immigration and Customs Enforcement (ICE) operations. State law prohibits local and state authorities from detaining a person solely on the basis of a federal civil immigration detainer. However, the law allows a wide range of communication, information sharing, and collaboration with federal immigration agents. To research this report, Citizens for Juvenile Justice (CfJJ) submitted more than 90 public records requests to police, sheriff and district attorney's offices in Massachusetts. We found that local police, sheriffs, and courthouse staff regularly collaborate, and share information, with federal immigration authorities, thereby acting as 'force multipliers' for ICE. This reduces trust in the justice system, short circuits ongoing legal cases, and undermines our democratic processes. We urgently need barriers between local law enforcement and the federal policing apparatus at this moment.

Select Findings

I. Prearrest: Police Surveillance and Information Sharing with Federal Agencies:

Fusion centers and license plate readers collect and share information with ICE

The Boston Regional Intelligence Center (BRIC) and the Massachusetts Fusion Center collect information on a wide range of individuals and share that information with many federal agencies, including the Department of Homeland Security (DHS). License plate readers (LPRs) also collect driver data at undisclosed locations across the state. LPR's are installed by local police departments, and their data is shared with ICE through a federal database.

Police departments communicate with ICE in the field

Multiple municipal police departments allow officers to detain individuals pre-arrest and contact ICE if the officer suspects there is an immigration violation. ICE operates a Law Enforcement Service Center (LESC) where local law enforcement can call ICE for guidance on what to do if a detainer comes up on

the system. CfJJ has identified at least one municipal police department in the state that has used the LESC service.

II. During and after arrest: Fingerprinting and Police Policies Enable Extensive Information Sharing and Collusion with ICE:

The fingerprinting process at arrests results in automatic information sharing with the FBI and ICE

A common part of the booking process for police involves fingerprinting individuals. Although fingerprinting is only required when booking felony arrests, most police departments fingerprint all youth and adults for all misdemeanor and felony arrests. These fingerprints get shared with a statewide database, which then forwards the information to federal authorities, including but not limited to ICE. ICE is using this fingerprint information to locate and detain individuals who have civil immigration detainers.

Many police departments in the state either allow collaboration with ICE or do not have an immigration enforcement policy

A public records request (PRR) to 57 police departments across the state found that 28 departments had policies allowing, or in a few cases requiring, collaboration with ICE. Another 25 departments did not have policies or did not respond to CfJJs PRR. Only 4 departments contacted had restrictive policy for communicating and collaborating with ICE. Multiple police department policies require immigration status checks at arrest and require sharing the information with ICE. Some departments allow collaboration with ICE for many reasons.

Police collaboration with ICE has had real negative impacts

Data from the deportation project found that, since Donald Trump's 2025 inauguration, 210 ICE arrests have occurred in association with 32 police departments across the state. CfJJ has found at least one instance of police possibly violating the *Lunn v. Commonwealth* court ruling by detaining an individual for an extended period of time to contact ICE.

County Sheriffs and the Trial Court extensively communicate with ICE

Most sheriff departments have incredibly close collaboration with ICE, sharing daily logs of who comes into their custody, and regularly sharing information about when and where individuals are going to court and whether they might be released on bail. The Trial Court's own rules also allow sharing information with ICE, and people are regularly arrested/detained for immigration violations at courthouses throughout the Commonwealth.

Select Recommendations

Defend state level justice systems: Everyone deserves to have their day in court and be presumed innocent until guilty. We should not allow local actors to communicate with ICE as it short cuts our legal processes that everyone is entitled to.

Do not further the false "good immigrant/bad immigrant" narrative: While a good immigrant/bad immigrant narrative may play well in certain political situations, there is no definition of what makes someone "bad" and who decides that. Federal authorities are describing entire communities with a bad immigrant narrative. Continuing with this narrative will lead to more problematic policy.

Expand and pass the PROTECT Act: The legislature should prioritize passing the PROTECT Act that limits the ability of sheriff's departments and other local law enforcement agencies to share information with federal immigration authorities. The PROTECT Act would benefit from amendments to include stricter rules around sharing fingerprints with federal authorities and remove carve outs that reference chapter 265.

Increase guardrails around police surveillance: The legislature and municipalities should comprehensively re-think the collection and use of alleged gang membership information, with strong consideration given to abolishing and prohibiting these databases or placing strict guardrails and regulations on them. The legislature should also limit the use of law enforcement license plate readers and facial surveillance technology, including the sharing of information into federal databases.

The Trial Court should proactively enact rules that limit ICE access and information sharing on court property: The Trial Court should proactively enact rules that strictly limit ICE access, activity and arrests in courthouses or on court property.

The AGO and POST Commission should expand accountability and oversight: The AGO should review current police policies to ensure they comply with the *Lunn v.*

Commonwealth court decision. The POST Commission should use its law enforcement oversight function to develop comprehensive methods to hold police departments, individual officers and sheriff's departments accountable for violating immigration-related information sharing policies.

Conclusion

The details and manner of local police and state-level justice system collaboration with the federal government during the current federal authoritarian turn have implications that go well beyond the immigrant community. Our democracy requires that we urgently establish barriers between local law enforcement and the federal policing enterprise at this moment.

INTRODUCTION

These are not normal times in the United States. We currently find ourselves in a moment of serious democratic backsliding by our federal government.[1] The Trump administration—with approval from a Republican-controlled US Congress, and the United States Supreme Court—is enacting an aggressive agenda that targets both newly arriving immigrants and long-settled residents with arrest, detention and deportation.[2] Immigrations and Customs Enforcement (ICE) officers have shifted enforcement away from the border and into our communities, detaining tens of thousands of residents,[3] and killing dozens of detainees and at least six protestors[4] – including two in high profile killings in Minneapolis.[5] Civil liberties and constitutional protections have been cast aside.

In this context, understanding the nature of cooperation between local law enforcement and federal immigration authorities is of growing importance with major

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[1] Harvard political scientist Steven Levitsky recently labeled the United States as no longer a 'democratic' system but rather 'competitive authoritarian', meaning that there are nominally competitive elections, but that the regime is doing all it can to undermine those elections and is acting in an authoritarian manner. Harvard Kennedy School, "Harvard experts discuss "competitive authoritarianism," and the "tactical frivolity" that No Kings protestors are deploying in response," available at: https://www.hks.harvard.edu/faculty-research/policy-topics/democracy-governance/harvard-experts-discuss-competitive.

[2] *Protecting the American People Against Invasion,* The White House (Jan. 20, 2025), https://www.whitehouse.gov/presidential-actions/2025/01/protecting-the-american-people-against-invasion/;Text-H.R.1-119th Congress (2025-2026): *An act to provide for reconciliation pursuant to title II of H. Con. Res. 14*, H.R.1, 119th Cong. (2025), https://www.congress.gov/bill/119th-congress/house-bill/1/text; Heidi Altman et al., *The Anti-Immigrant Policies in Trumps Final "Big Beautiful Bill," Explained*, National Immigration Law Center (Aug. 20, 2025), https://www.nilc.org/wp-content/uploads/2025/07/The-Anti-Immigrant-Policies-in-Trumps-Final-Big-Beautiful-Bill-Explained.pdf; Amy Howe, *Supreme Court Allows Federal Officers to More Freely Make Immigration Stops in LA*, SCOTUS Blog (Sep. 8, 2025), https://www.scotusblog.com/2025/09/supreme-court-allows-federal-officers-to-more-freely-make-immigration-stops-in-los-angeles/.

[3] Sam Levine, *Federal Agents Use Teargas on Protesters Outside ICE Agents' Alleged Minneapolis Hotel*, The Guardian (Jan. 26, 2026), https://www.theguardian.com/us-news/2026/jan/26/minnesota-minneapolis-ice-hotel-protests; Liz Landers, Doug Adams & Amalia Huot-Marchand, *'They Are Circling Our Schools,' Superintendent Says After 5-Year-Old Detained by ICE*, PBS NewsHour (Jan. 23, 2026), https://www.pbs.org/newshour/show/they-are-circling-our-schools-superintendent-says-after-5-year-old-detained-by-ice.

[4] Jennifer Mascia, *"How Many People Have Been Shot in ICE Raids?"* The Trace (December 8, 2025) https://www.thetrace.org/2025/12/immigration-ice-shootings-guns-tracker/.

[5] Joshua Barajas, *A Second U.S. Citizen Was Killed by Federal Forces in Minneapolis. Here's What We Know*, PBS NewsHour (Jan. 26, 2026, 4:13 PM EST), https://www.pbs.org/newshour/nation/a-second-u-s-citizen-was-killed-by-federal-forces-in-minneapolis-heres-what-we-know.

implications for the nature of democracy in a federal system. To research this report, Citizens for Juvenile Justice (CfJJ) submitted more than 90 public records requests to police, sheriff and district attorney's offices in Massachusetts to document policies and examples of information sharing and collaboration between those agencies and federal immigration authorities.

The primary finding of this report is that most of the municipal, county, and state institutions that make up the juvenile and criminal justice systems in Massachusetts extensively collaborate and share information with ICE. Information sharing and collaboration from local police and sheriffs are the norm and is written into many policies. In Massachusetts, since the start of President Trump's second term, more than 200 people have been taken into ICE custody directly from police stations and more than 600 directly from courthouses.[6] These arrests from local police stations and state courthouses reflect the current state of Massachusetts law and practices, while illustrating a disturbing reality: our juvenile and criminal justice system agencies (including police, sheriffs and the courts) have been willing participants as tools to localize the Trump administration's enormously harmful deportation regime. Local information sharing and collaboration with ICE has negative impacts on our immigrant neighbors and coopts our state-level justice system into acting as a 'force multiplier' for the federal administration's authoritarian policies toward immigrant children and adults.[7]

Municipal and county law enforcement cooperation and information sharing with ICE not only fuels this xenophobic and misguided deportation machine; these policies also erode public trust in local law enforcement and ultimately harm public safety in the Commonwealth. When communities fear that any interaction with police could result in federal immigration enforcement, residents become less likely to report crimes or

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[6] Sarah Betancourt, *There Were Over 600 ICE Arrests in Mass. Courthouses This Year. Here's Where They Occurred*, GBH News (Mar. 18, 2026), https://www.wgbh.org/news/local/2026-03-17/there-were-over-600-ice-arrests-in-mass-courthouses-last-year-heres-where-they-occurred; Simon Rios, *More than 7,000 ICE Arrests in Massachusetts So Far Under President Trump*, WBUR (Apr. 1, 2026), https://www.wbur.org/news/2026/04/01/7000-ice-arrests-massachusetts-trump?ref=massdump.ghost.io.

[7] Peter Mancina, *Why Sanctuary Policies Fail to Protect Immigrants: An Excerpt from* On the Side of ICE, NYU Press Blog (Oct. 14, 2025), https://nyupress.org/blog/2025/10/14/why-sanctuary-policies-fail-to-protect-immigrants-an-excerpt-from-on-the-side-of-ice-by-peter-mancina/.

cooperate with investigations.[8] Further, ICE intervention undermines state-level justice from being fully served, as victims lose the opportunity to receive closure, and defendants surrender their due process rights, including the right to an opportunity to appear and be heard in our state court system and to face their accuser at trial. For example, compelling testimony provided by Chelsea city manager Fidel Maltez spoke of how "the fear and chaos" caused by ICE is making residents "afraid to seek help, to report crimes, [and] to attend routine court hearings."[9] Local law enforcement exists to enforce state and local laws, not to carry out an unnecessarily aggressive federal immigration policy that is contrary to local and state priorities, not to mention civil and human rights.

State law is quiet to date on communications and sharing information with federal immigration enforcement agencies. While no statewide law directly addresses local law enforcement's communications with federal immigration agents, the issue is largely governed by the Massachusetts Supreme Judicial Court's 2017 decision in *Lunn v. Commonwealth* (SJC-12276). In *Lunn*, the SJC held that local law enforcement officers have no legal authority to arrest or detain an individual solely on the basis of a federal civil immigration detainer, unless doing so is otherwise authorized under state law to protect public safety. The ruling also held that MA court officers cannot arrest an individual solely at the request of federal immigration authorities.[10] In May 2025, the MA Attorney General's Office reaffirmed the protections offered by *Lunn*, emphasizing that local law enforcement cannot be compelled by the federal government to carry

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[8] Meg Anderson, *Police Say ICE Tactics are Eroding Public Trust in Law Enforcement*, NPR (Mar. 30, 2025), https://www.npr.org/2025/03/30/nx-s1-5304236/police-say-ice-tactics-are-eroding-public-trust-in-local-law-enforcement; Louisa Moller, *Milford, Massachusetts Police Chief on Local ICE Arrests: "We're Way Out of the Loop", CBS News (Jun. 6, 2025)* https://www.cbsnews.com/boston/news/milford-police-ice-marcelo-gomes-arrest/; Charles Powers, *287(g): ICE Deputizing Local Law Enforcement Harms Migrants and Local Communities*, 5 IMMIGRATION AND HUMAN RIGHTS LAW REVIEW, Article 1. (2024), Available at: https://scholarship.law.uc.edu/ihrlr/vol5/iss1/1/.

[9] "The fear and chaos is causing our residents in Chelsea to be afraid to seek help, to report crimes, to attend routine court hearings, because they fear a civil immigration arrest. This hurts our families and erodes the trust in our institutions and our legal processes. When trust in the system breaks down is weakens everyone. It weakens our community and it undermines the fairness of our justice system."

Public Forum on H.D. 5608, An Act Promoting Rule of Law, Oversight, Trust, and Equal Constitutional Treatment (The PROTECT Act): Forum Before the H. Comm. on Pub. Safety & Homeland Sec., 194th Gen. Ct. of the Commonwealth of Mass. (Mar. 4, 2026) (statement of Fidel Maltez, Chelsea City Manager) (video recording at 1:00:37), https://malegislature.gov/Events/SpecialEvents/Detail/442.

[10] *Lunn v. Commonwealth*, 78 N.E.3d 1143 (Mass. 2017).

out federal civil immigration enforcement.[11] However, the *Lunn* decision does not cover the range of possible cooperation and information sharing mechanisms between local law enforcement and federal authorities.

Local and state elected leaders have been increasingly standing up to protect our immigrant neighbors, civil liberties, and state institutions, but there remains significant work to be done. The Massachusetts House passed the PROTECT Act in late March 2026, which has provisions that would create some guardrails to limit cooperation and information sharing between state and municipal institutions and federal immigration authorities.[12] This type of legislation is absolutely necessary to rein in current practices where localized decisions to cooperate and share information with federal immigration authorities are left to each individual state or municipal agency.

This report describes the ways that information is currently shared between local/county/state law enforcement and federal immigration authorities. The report focuses on departmental policies and practices that reveal a willingness of local and state actors to share information and collaborate with the current, aggressive federal deportation system. Given the rapid democratic backsliding and open tendency toward authoritarianism from the federal government,[13] this report makes a call for close examination—and restriction—of collaboration between local police/state justice agencies and the federal policing apparatus and to reject preemptive obedience in the face of this rise in authoritarianism.[14]

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[11] Andrea Joy Campbell, *Attorney General Guidance: Know Your Rights: ICE Enforcement A Guide For Immigrants, Families, and Communities,* Office of the Attorney General (May 29, 2025) https://www.mma.org/wp-content/uploads/2025/05/05.29.2025-AGO-ICE-Guidance-Final.pdf.

[12] Exec. Order of Mayor Michelle Wu, *An Executive Order to Protect Bostonians from Unconstitutional and Violent Federal Operations* (Feb. 5, 2026), https://www.boston.gov/sites/default/files/file/2026/02/Executive%20Order%20to%20Protect%20Bostonians%20from%20Unconstitutional%20and%20Violent%20Federal%20Operations-signed.pdf; Jonathan Cohn, *MA House Passes PROTECT Act 134 to 21*, Progressive Mass (Mar. 26, 2026), https://www.progressivemass.com/ma-house-passes-protect-act-134-to-21/.

[13] Levitsky, *Supra* note 1.

[14] Timothy D. Snyder, *On Tyranny: Twenty Lessons from the Twentieth Century*, at Lesson 1 (Feb. 28, 2017).

I. Pre-Arrest: Police Surveillance and Information Sharing with Federal Agencies

A. Fusion centers and automatic license plate readers facilitate the sharing of surveillance information with the Department of Homeland Security

The policing infrastructure in Massachusetts includes significant surveillance regimes under the Boston Regional Intelligence Center (BRIC, operated within Boston Police Department) and the Massachusetts Fusion Center (operated within the Massachusetts State Police). The Boston Police Department (BPD) and neighboring departments are members of BRIC, which collects surveillance information on a range of individuals, including protesters as well as so-called 'violent associative groups' (formerly referred to as "gangs"), with real implications for people allegedly on these lists.[15] Boston releases an Annual Surveillance Report that publicizes various agency policies on surveillance and the acquisition, maintenance and sharing of information. Generally, BPD may share surveillance data with federal or state prosecutors or agents for "legitimate law enforcement purposes only," though this term is not explicitly defined.[16]

Notwithstanding the data protections mentioned above, federal Department of Homeland Security (DHS) is an active member of the BRIC and federal officials sit in BPD headquarters in the BRIC.[17] The legal agreement between BPD and DHS states that BPD shall "(3) provide access to Host databases, reports, investigations, and other information produced, retained, and/or controlled by the Host in order to review this

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[15] *Privacy, Civil Rights, and Civil Liberties Protection Policy*, Boston Regional Intelligence Center (2024), https://police.boston.gov/wp-content/uploads/2025/05/BRIC-Privacy-Civil-Rights-Civil-Liberties-Protection-Policy-2024.pdf; *What's the Matter with the Boston Regional Intelligence Center?*, Privacy SOS, https://privacysos.org/whats-the-matter-with-the-boston-regional-intelligence-center/; *Records Reveal Boston Police Spy on Political and Peace Groups*, Am. Civil Liberties Union (Oct. 18, 2012), https://www.aclu.org/press-releases/records-reveal-boston-police-spy-political-and-peace-groups-0.

[16] City of Boston, 2024 City of Boston Annual Surveillance Technology Report 18 (2024), Available at: https://www.boston.gov/sites/default/files/file/2025/07/2024%20City%20of%20Boston%20Annual%20Surveillance%20Report.pdf.

[17] BPD staff personal communication, February 27, 2026.

information and assist the Host in identifying the types of information, including enforcement information, that may assist DHS or other entities with homeland security responsibilities."[18] BPD is still subject to the Boston Trust Act, though BPD has used surveillance software without City Council approval,[19] and the BRIC has collected extensive social media and other surveillance on members of the public, including protesters, for years.[20] BPD and other municipal police departments also participate in a range of federal policing 'taskforces,' and BPD has a memorandum of understanding (MoU) with ICE's Homeland Security Investigations (HSA) that designates certain BPD officers as customs officers who can assist ICE HSI.[21]

Automatic license place reader (LPR) cameras are also being used by at least seven police departments across the state to "collect data indicating who is driving" a vehicle at a specific place and time.[22] The locations of LPR cameras are often undisclosed to the public, and there is no public approval process needed for a department to begin using them. Multiple companies make LPR cameras, most notably Flock Safety, whose cameras collect "information about everyone indiscriminately," which is then stored on a "federal cloud database."[23] This is of great concern given the ACLU's discovery that Flock has been facilitating "the automatic sharing of sensitive data with thousands of law enforcement agencies nationwide – including those involved in civil immigration

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[18] Memorandum of agreement between the Department of Homeland Security [Office of Intelligence and Analysis and the Boston Police Department, Boston Regional Intelligence Center (signed by BPD on February 7, 2023), Section V(B)(3)).

[19] Bay State Banner. "Surveillance software used by BPD without City Council approval." Yawu Miller, https://baystatebanner.com/2025/07/16/surveillance-software-used-by-bpd-without-city-council-approval/.

[20] Nasser Eledroos & Kade Crockford, *Social Media Monitoring in Boston: Free Speech in the Crosshairs*, Privacy SOS (2018), https://privacysos.org/social-media-monitoring-boston-free-speech-crosshairs/.

[21] *Memorandum of Understanding Between US Immigration and Customs Enforcement Homeland Security Investigations and Boston Police Department Regarding The Designation of Boston Police Department Employees as Customs Officers*, ICE HSI (2014), https://d279m997dpfwgl.cloudfront.net/wp/2019/10/1025_DHS-MOU-2014.pdf.

[22] ACLU of Mass., *ACLU of Massachusetts Warns Cities and Towns about Dangers of License Plate Readers*, ACLU of Mass. (Nov. 17, 2025), https://www.aclum.org/press-releases/aclu-of-massachusetts-warns-cities-and-towns-about-dangers-of-license-plate-readers/.

[23] Juliet Schulman-Hall, *If You Drive in Massachusetts, It's Probably on Camera*, GovTech (Oct. 17, 2023), https://www.govtech.com/public-safety/if-you-drive-in-massachusetts-its-probably-on-camera.

enforcement."[24] This means that national law enforcement agencies, including ICE, are able to utilize data collected from LPR cameras to locate and detain individuals in Massachusetts. While local law enforcement may not be directly collaborating with ICE to share this information, the use of LPR cameras indirectly assists ICE in their goals.

B. BRIC and other police departments' use of gang databases raise many concerning questions, including racial disparities and civil liberties concerns

Gang member databases have been documented as racially discriminatory and often ridden with errors.[25] Boston's use—and misuse[26] —of a database of alleged gang members has been critiqued both from the media,[27] and notably from a scathing decision from the Federal First Circuit Court of Appeals.[28] In its 2022 *Diaz Ortiz v.* Garland decision, the Court denounced the Boston Police Department's gang database, characterizing it as an "erratic point system built on unsubstantiated inferences."[29] However, Boston is just one of many municipalities in the Commonwealth of Massachusetts that collects the names of largely Black and Latino residents allegedly identified as gang affiliated.

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[24] ACLU of Mass., *ACLU of Massachusetts Warns Cities and Towns about Dangers of License Plate Readers*, ACLU of Mass. (Nov. 17, 2025), https://www.aclum.org/press-releases/aclu-of-massachusetts-warns-cities-and-towns-about-dangers-of-license-plate-readers/.

[25] Center for Popular Democracy and United We Dream. (2020). *Eliminating the Use of Gang Databases.* https://localprogress.org/wp-content/uploads/2021/04/2020-LP-Policy-Brief-Gang-Databases.pdf.

[26] Walker, A., Lafaille, A., & Davis, E. F. (2022). *Should Boston's Gang Database Be Dismantled?* In Greater Boston Debate Series. The Rappaport Center for Law and Public Policy at Boston College Law School and the Rappaport Institute for Greater Boston at Harvard Kennedy School. Retrieved from https://www.greaterbostondebateseries.com/programs.

[27] Sandra Susan Smith, Felix Owusu, and Stacey Borden. (2022, January 31). *Boston's gang databases should be dismantled.* Boston Globe. https://www.bostonglobe.com/2022/01/31/opinion/bostons-gang-database-should-be-dismantled/; for a contrasting view, *see* Christopher Winship and Anthony A. Braga. (2022, February 24). *Reform Boston's gang database, don't dismantle it.* Boston Globe. https://www.bostonglobe.com/2022/02/24/opinion/reform-bostons-gang-database-dont-dismantle-it/.

[28] United States Court of Appeals For the First Circuit. (2022, January 10), *Ortiz v. Garland.* JUSTIA US Law, https://law.justia.com/cases/federal/appellate-courts/ca1/19-1620/19-1620-2022-01-10.html.

[29] Ibid.

Police department gang database management practices raise significant civil liberties and due process concerns, including:

- Subjective and racialized identification methods, which lead to the misidentification of individuals as gang members and contribute to disproportionate policing of communities of color.
- Lack of transparency and due process, as most departments fail to notify individuals of their inclusion in gang databases or provide any opportunity to challenge their designation.
- Poor data management and oversight, with many police departments failing to regularly update, review, or audit and remove names from their gang databases, resulting in outdated and inaccurate records.

C. DHS grants to municipalities raise concerns due to requiring cooperation on immigration enforcement

Massachusetts and municipalities receive various grants from the federal government, including DHS.[30] The 2025 updated terms and conditions applying to all DHS awards, demand cooperation between local law enforcement and DHS officials and require information sharing with DHS regarding citizenship or immigration status of any individual.[31] Despite this language, the City of Boston re-applied for a $12 million DHS grant, called the Urban Area Security Initiative grant, to help fund BRIC; the terms of this grant further stipulate, however, that 10% of the funds must be spent on "supporting collaborations between state and local law enforcement and U.S. Immigration and Customs Enforcement." While Boston Mayor Michelle Wu has held

[30] *Massachusetts Receives Over $19 M in Federal Homeland Security Funding*, Mass. Exec. Off. of Pub. Safety & Sec., Off. of Grants & Rsch. (Oct. 15, 2024), https://www.mass.gov/news/massachusetts-receives-over-19-m-in-federal-homeland-security-funding.

[31] FY 2025 DHS Standard Terms and Conditions, U.S. Department of Homeland Security (Apr. 18, 2025), https://www.dhs.gov/sites/default/files/2025-08/2025_0418_fy2025_dhs_terms_and_conditions_version_3.pdf ("All recipients ... must comply with ... statutes prohibit[ing] restrictions on information sharing by state and local government entities with DHS regarding the citizenship or immigration status, lawful or unlawful, of any individual;" "They will honor requests for cooperation, such as participation in joint operations, sharing of information, or requests for short term detention of an alien pursuant to a valid detainer.").

that accepting the terms of the grant won't necessarily violate the Trust Act, several representatives from towns encompassed by BRIC – including Brookline, Cambridge, Chelsea, Everett, Quincy, Revere, Somerville, and Winthrop – have said that they will be unable to comply with the requirement to support ICE.[32]

D. Some Police Departments Allow Officers to Share Information with ICE Prior to arrest

The Lexipol immigration policy utilized by Chicopee, Dracut, Tewksbury, and Shrewsbury police departments allows for communication with ICE upon lawful police contact. The policy reads that "an officer who has a reasonable suspicion that an individual already lawfully contacted or detained has committed a criminal violation of federal immigration law may detain the person for a reasonable period of time in order to contact federal immigration officials to verify whether an immigration violation is a federal civil violation or a criminal violation."[33] Allowing police to detain a lawfully contacted individual solely based on immigration questions indirectly places local law enforcement in the line of immigration enforcement. The Lexipol policy and its effects also will be discussed in greater detail in Section II.B.i of this report.

E. ICE encourages local law enforcement information sharing, even outside of 287(g) agreements

ICE makes it easy for local law enforcement to contact them with questions, which is one reason why local law enforcement needs clear rules about when contact with ICE is required. ICE operates a Law Enforcement Service Center (LESC), where local law enforcement can call ICE and get guidance on what to do if a detainer comes up on

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[32] Yawu Miller, *Wu Says City will Apply for Federal Funds Tied to ICE*, Flip Side News (Aug. 11, 2025), https://flipsidenews.net/wu-says-city-will-apply-for-federal-funds-tied-to-ice/; see also https://law.hawaii.gov/ohs/wp-content/uploads/sites/2/2025/08/FY_2025_HSGP_with-UASI-NOFO-Updated-8-1-25.pdf.

[33] Lexipol Policy 413.

the system.[34] CfJJ has identified a local police department (Shrewsbury) contacting the LESC by phone in early 2026, though most departments have not responded substantively to our public records request.[35] Furthermore, ICE operates Alien Criminal Response Information Management System, or ACRIMe, "to receive and respond to immigration status inquiries made by other agencies about individuals who are arrested, subject to background checks or otherwise encountered by those agencies."[36] ICE has made it easy for local law enforcement to collaborate.

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[34] A detailed description of how these interactions go in practice is given in Peter Mancina's book, *On the Side of ICE*.

[35] Shrewsbury Police Response to CfJJ public records request (Apr. 13, 2026).

[36] U.S. Dep't of Homeland Sec., *DHS/ICE/PIA-020: Alien Criminal Response Information Management System (ACRIMe)* (Sept. 2018), https://www.dhs.gov/publication/dhsicepia-020-alien-criminal-response-information-management-system-acrime.

II. At Arrest: Fingerprinting and Police Policies Enable Extensive Information Sharing and Collusion with ICE

A. The current fingerprinting process following arrests results in automatic information sharing with the FBI and ICE

This section describes the three-step process that automatically sends information of people who have been arrested by local law enforcement to ICE. Specifically, police (1) fingerprint people arrested for both misdemeanors and felonies and (2) automatically transmit those fingerprints to the Massachusetts State Police (MSP). MSP then (3) automatically transmits those fingerprints to the FBI, where ICE has access to the records.

Who gets fingerprinted? First, at the point of arrest, Massachusetts law **requires** arresting police department to take fingerprints ***only for felony charges*** under MGL Chapter 263.[37] Arresting departments ***may*** fingerprint after felony arrests under MGL Chapter 94C (concerning drug offenses).[38] There is no explicit statutory authority for taking fingerprints after a misdemeanor arrest.

Across the Commonwealth, it is the overwhelming **policy and practice** of police departments to fingerprint both juvenile and adult arrests for both misdemeanor and felony arrests, going beyond the statutory legal requirements. Some agencies may be under the impression that they are statutorily required to fingerprint people after a misdemeanor arrest. In one pertinent example, Chelsea Police Department, in its statement about the May transfer of the 15-year-olds from police to ICE custody stated that, "All persons taken into custody on criminal charges are, **by law**, fingerprinted, and those fingerprints are immediately entered into state and federal databases as part of the standard booking process. These databases automatically generate alerts to

[37] MGL Ch 263 §1a.

[38] MGL Ch 94C §45 (police departments "**may**" fingerprint for felony arrests under the chapter (for drug offenses), but that upon conviction, such fingerprints "shall become part of the permanent record.").

relevant federal law enforcement agencies if the individual is of interest to them."[39] This statement is an incorrect recitation of the law, as police are not required by statute to fingerprint those arrested for misdemeanor offenses. But the statement reveals police practice.

Second, Massachusetts regulations require police departments to send fingerprints of felony arrests to the Massachusetts State Police (MSP) State Identification Section (SIS), and police may submit fingerprints of misdemeanor arrests to SIS.[40] Again, in practice, most police department policies and practices are to send fingerprints of misdemeanor and felony arrests to MSP. For instance, all fingerprint checks conducted by the Framingham Police Department are transmitted to MSP.[41]

Third, the State Police submit fingerprints to FBI databases for a nationwide warrant check. The FBI automatically gives access to the fingerprint data to ICE under 'secure communities,' a program that notifies ICE about individuals who have violated civil or criminal immigration laws.[42] ICE then issues detainer requests to local police and sheriff's departments.

Problems with the fingerprinting process: There are several problems with the fingerprinting process, including local police departments police taking and transmitting many more fingerprints than is required by law, that normalize the sharing of information with federal authorities.

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[39] *Chelsea Police Dep't, Statement on Federal Custody Transfers*, Chelsea Police Dep't (May 13, 2025), https://chelseapolice.com/news_detail_T4_R141.php.

[40] 803 CMR § 7.08 read 803 CMR § 7.08 reads in relevant part that "(1) Fingerprints **shall** be submitted to the Massachusetts State Police State Identification Section (SIS) in the following instances:
...(b) any felony arrest by a law enforcement agency, as **required** by M.G.L. c. 263, § 1A; (c) any arrest for a felony violation of M.G.L. c. 94C, as **required** by M.G.L. c. 94C, § 45; **[Author note: the regulation mis-states the requirement given the word 'may' in the statute]** (d) detentions and/or incarcerations by the Department of Correction and/or Sheriffs' Departments, including any such detentions and/or incarcerations in jails, houses of correction, or state prisons;
...(2) Fingerprints **may** also be submitted to the SIS for misdemeanor arrests." (emphasis added)

[41] Framingham Police Dep't, *Immigration Enforcement*, Policy 200-15 (eff. July 26, 2017, rev. Dec. 1, 2022), https://www.cfjj.org/s/Framingham-PD-Policy.pdf.

[42] *Secure Communities*, U.S. Immigr. & Customs Enf't, https://www.ice.gov/secure-communities.

First, and most relevant for this report, the fingerprint transmission process in Massachusetts enables federal immigration enforcement to target local individuals by informing them of the person's location and justice system involvement. Second, it is unclear what legislative or regulatory authority the state police submit fingerprints to the FBI. Third, 803 CMR § 7.08(1)(c) misstates that fingerprinting is required by M.G.L. c. 94C, § 45, despite the word 'may' in the statute.

Some police departments contend that fingerprint sharing helps them learn whether an individual in their custody has out of state warrants. However, fingerprint sharing with federal authorities, including ICE, in the current environment erodes public trust, especially when the offenses in question are low-level or nonviolent, or when the fingerprints are of a minor who is unlikely to have committed a crime across state lines.[43]

Both chambers of the Massachusetts legislature have pending bills, in the 2025-2026 legislative session, that would prevent law enforcement from transmitting fingerprints of juveniles to the FBI or the Department of Justice.[44] The expungement/juvenile fingerprinting bill (H.1657 and S.1058) does not seek to change fingerprinting processes at the arresting police department level, nor stop arresting departments from sending the fingerprint to the State Police. It would limit any "law enforcement or criminal justice agency" from sending those fingerprints to the FBI or DOJ.

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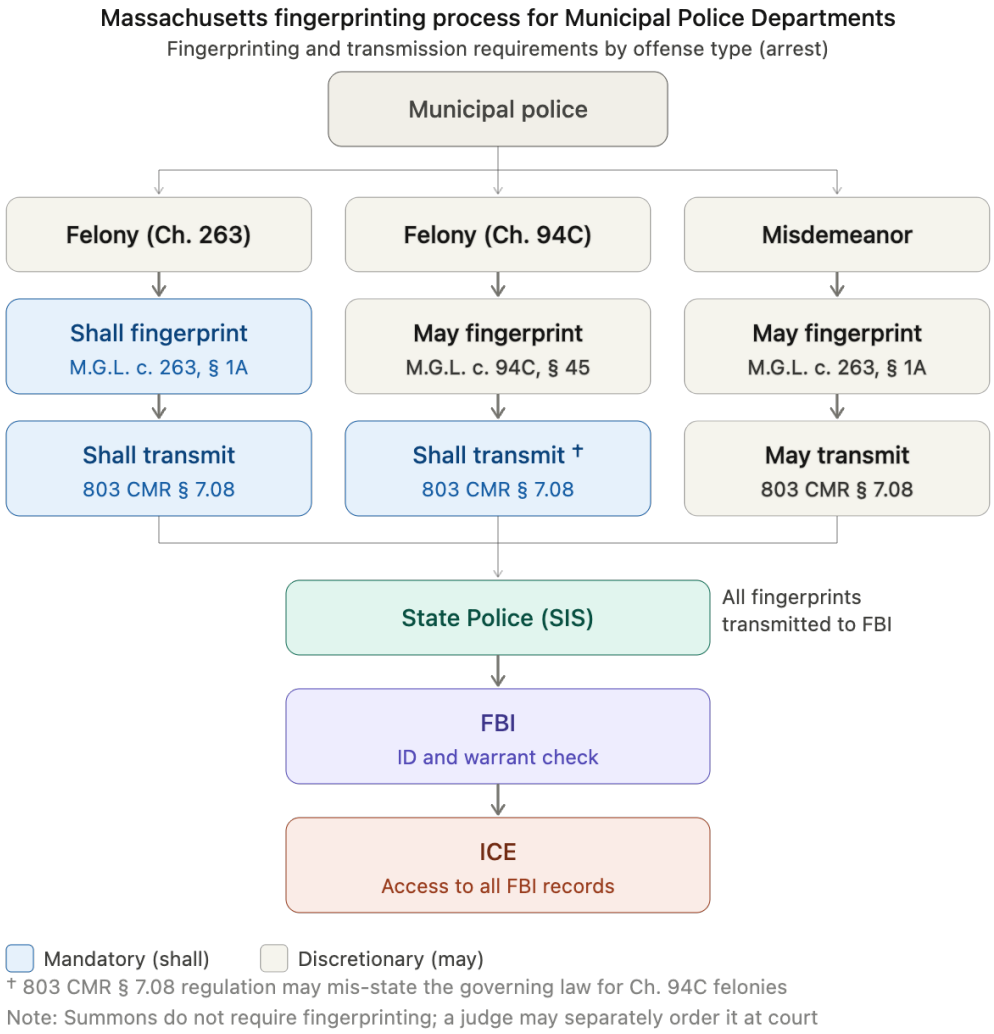
[43] Felipe M. Gonçalves, Elisa Jácome & Emily K. Weisburst, *Immigration Enforcement and Public Safety* (Nat'l Bureau of Econ. Research, Working Paper No. 32109, 2024), https://www.nber.org/system/files/working_papers/w32109/w32109.pdf.

[44] An Act Relative to Expungement of Juvenile and Adult Records, H.B. 1657 § 3, 194th Gen. Ct., Mass. (2025), https://malegislature.gov/Bills/194/H1657.Html.

Figure 1: The current fingerprint process sends details of all arrests to ICE



B. Police department policies governing information sharing with ICE vary widely, with many requiring immigration status checks and sharing results of those checks with ICE. Some, specifically, allow collaboration with ICE

CfJJ's analysis of 62 municipal police departments across the Commonwealth of Massachusetts found that departmental immigration policies vary widely, and largely fall into the following categories:

- 28 departments have policies that allow or require information sharing/collaboration with ICE;
- 20 departments have no policy;

- 6 departments did not have a policy but referred to their town or cities immigration ordinance;
- 4 departments have restrictive language regarding information sharing/collaboration and;
- 4 departments did not respond to CfJJ's public records requests.

Figure 2: Most police departments have policies that allow communication and collaboration with ICE.

● ALLOWS COLLABORATION AND/OR INFORMATION SHARING WITH ICE		● NO IMMIGRATION POLICY OR TOWN ORDINANCE	
Amherst	Nantucket	Barnstable	Milford
Andover	Natick	Billerica	New Bedford
Arlington	Peabody	Braintree	North Andover
Beverly	Plymouth	Burlington	Northampton
Chicopee	Randolph	Chelmsford	Norwood
Dracut	Quincy	Falmouth	Oak Bluffs
Everett	Salem	Fall River	Revere
Framingham	Shrewsbury	Franklin	Taunton
Haverhill	South Hadley	Leominster	Wellesley
Holyoke	Springfield	Marlborough	Woburn
Lowell	Tewksbury		
Lynn	Waltham		
Malden	Watertown		
Melrose	Weymouth		
● REFERS TO CITY/TOWN IMMIGRATION ORDINANCE		● RESTRICTIVE IMMIGRATION POLICY	
Boston	Lexington	Brookline	
Brockton	Newton	Bedford	
Cambridge		Medford	
Lawrence		Somerville	
● DID NOT RESPOND TO PUBLIC RECORDS			
Attleboro	Chelsea		
Brockton	Massachusetts State Police		

Source: CfJJ analysis of documents received from public records requests.

i. Police department policies governing information sharing with ICE vary widely, with many requiring immigration status checks and sharing results of those checks with ICE. Some, specifically, allow collaboration with ICE

The majority (28 out of 58) of the police department policies analyzed by CfJJ contained language that either allows officers the ultimate discretion, or in some cases requires officers, to share information and collaborate with ICE. This section highlights police policies from Quincy, Everette, Chicopee, Tewksbury, Shrewsbury, and Holyoke, all of which provide particularly egregious examples of open information sharing and collaboration with ICE.

Quincy:

- The Quincy Police General Order 3.08 (dated February 14, 2025) requires its officers to conduct an INS Immigration Alien query (IAQ) via the National Law Enforcement Telecommunication System (NLETS) "whenever a foreign-born person is arrested" and makes specific note that the results of this query are shared with the Local ICE office. (page 3)[45] This query is not required by federal or state law, is based solely on national origin of the person arrested, and such a policy broadly applies to foreign born US citizens and legal permanent residents (LPRs).
- The Quincy policy directs officers to notify ICE of the "bail determination and circumstances regarding the pending release from custody," clearly requiring collaboration with ICE.

Everett:

- The Everett Police Department (EPD)'s "Enforcing Immigration Laws" policy, enacted on March 19, 2025, begins with a reminder that "the enforcement of the nation's immigration laws is a primary responsibility of

[45] Quincy Police Dep't, *Immigration Enforcement*, General Order 3.08, (eff. Feb. 14, 2025), https://www.cfjj.org/s/Quincy-PD-Immigration-Policy.pdf.

the federal government." It also notes that EPD will not "stop a person on the suspicion that they may be an undocumented foreign national," nor "initiate police action where the primary objective is discovery of citizenship or lawful resident status of any person."[46] However, specific language in the policy raises serious concerns about permissible officer conduct under this policy, including it allows nearly unfettered collaboration between EPD and ICE.

- **EPD policy gives officers wide discretion to decide when to cooperate with ICE.** EPD policy states that the prohibition against initiating immigration investigations "does not preclude the department from cooperating with federal immigration officials when requested, or from notifying those officials in serious situations where a potential threat to the public is perceived" (emphases added).[47] The policy allows EPD to "cooperate with ICE when it serves a public safety interest of the City of Everett."[48] This language is incredibly broad, does not define key terms like "serious situations," "public safety" or even what constitutes a "potential threat." This lack of specificity leaves cooperation with ICE up to an individual officer's discretion and gives Everett police officers broad discretion to inquire into a person's immigration status and share that information in cooperation with ICE.
- **EPD policy allows for "citizenship and lawful resident status checks" in too many situations.** EPD policy allows officers to initiate a citizenship and residency check if someone is "arrested for any felony or misdemeanor and/or has questionable to no identification" (Procedure section A.4.a). Doing a citizenship check is not required by federal or state law and simply doing a

[46] Everett Police Dep't, *Enforcing Immigration Laws*, Policy PP OPR-12 (eff. Mar. 19, 2025), https://www.cfjj.org/s/Everett-PD-Immigration-Policy.pdf.

[47] Ibid.

[48] Ibid.

citizenship check for someone who has "questionable to no identification" is the lowest bar imaginable.

- **EPD policy allows for the communication of location information to federal immigration authorities in too many circumstances.** There are six exceptions to the EPD policy which state that "officers shall not inform federal immigration authorities of the whereabouts or behavior of any immigrant or foreign visitor" (procedures C.1-C.6). These exceptions are so overly broad that they, in practice, undermine the stated intent of the policy to avoid and leave an open door to cooperation with ICE. Three particularly egregious exceptions are listed below.
    - **The EPD policy allows officers to inform ICE if they come across a person who "has been convicted of any felony."** There are no specifics or limitations to this provision, such as the recency of the felony conviction or the level or type of felony that they were convicted of.
    - **The EPD policy makes an exception for being "reasonably suspected of participating in criminal street gang activity"** (C.5), a standard that is far too low of a barrier given the low threshold of reasonable suspicion and lack of detail on what criteria can be relied upon to meet that threshold.
    - **The EPD policy makes an exception for anyone who "has a warrant (civil or criminal)"** (C.6). Civil warrants are typically for failing to pay a fine, evictions, unpaid debts and other similar matters that involve no threat to public safety and certainly should not form the basis for sharing information with federal authorities.

Lexipol policy adopted in several Massachusetts towns:

- Lexipol is a private, for-profit, company that creates template policies for local law enforcement agencies to purchase. In Massachusetts, Lexipol provides policies for **Chicopee, Dracut, Tewksbury, and Shrewsbury**,

and possibly for other departments as well. Lexipol's "Immigration Violations" policy (policy 413), offers minimal protections that ensure immigrants are safe to interact with the police, while enabling officers to cooperate with Immigration and Customs Enforcement (ICE) beyond what is required by law or in ways that cannot be reasonably construed as necessary to promote public safety. A major concern is that the **Lexipol policy allows an officer to detain someone and contact ICE if they have a "reasonable suspicion of that lawfully contacted person having committed a criminal immigration violation" (413.4 "Detentions")**. This puts local police in a position to investigate immigration violations, and the 'reasonable suspicion' bar for investigation is very low. Given ICE policies and practice, this type of policy allows municipal police to decide whether to have a person taken into ICE custody. Lexipol's policy later states that "all individuals, regardless of their immigration status, must feel secure that contacting or being addressed by members of law enforcement will not automatically lead to immigration inquiry and/or deportation." This very much implies that being in contact with the Chicopee Police, whether as a victim, witness, or suspect, can, at times, lead to an immigration inquiry, arrest and/or deportation.

Holyoke:

- The Holyoke Police Department's Standing Operating Procedure DU-12 entitled "Immigrant Community Members" reads, in relevant part: "All individuals arrested and processed at the Holyoke Police Department shall have their identification information queried against the National Crime Information Center (NCIC) as well as Massachusetts Warrant Management System (WMS). Should an ICE warrant, criminal deportation order or detainer be indicated, the officer in charge of the shift shall contact ICE." This policy permitting an officer to run an immigration status check on all arrested individuals is not required by law, and results in a solely punitive approach regardless of the nature of the offense the person was arrested for.

While the policies mentioned above are notably excessive, many other departments have policies that, while not as openly egregious, are ambiguous and therefore do not provide meaningful limitations or guardrails to what local law enforcement officers can and cannot do in regard to immigration enforcement. The above policies show the need for legislation to contain and overcome a strong police instinct to collaborate with a sister law enforcement agency, even when that agency may not be working in the public interest or following constitutional protections.

ii. Departments with no policies

A plurality (20 out of 58) police departments contacted by CfJJ lacked formal immigration policies. Some departments, such as Cambridge Police Department, refer to their city's municipal sanctuary ordinance, in this case "Welcoming Community Ordinance."[49]

However, police departments sometimes ignore these ordinances. For example, when CfJJ submitted a PRR to the Lawrence Police Department asking for their departments immigration policy, Lawrence Police responded that they "believe there is a document at City Hall covering sanctuary city responsibilities" yet they do "not have a copy of that document," suggesting that the department did not feel restrained by the ordinance.[50] CfJJ located the "Lawrence Trust Ordinance" online. Written into this ordinance are the following reporting requirements from Lawrence Police Department to the Lawrence Town Council:

"Beginning on September 1, 2015, and on every other month thereafter, the police chief shall submit a report" detailing:

1. "The total number of ICE hold, administrative warrant, and notification requests lodged with city law enforcement officials, organized by the reason(s) given for the request;

[49] Cambridge, Mass., Code of Ordinances tit. 2, ch. 2.129 (Welcoming Community Ordinance), § 2.129.010, https://library.municode.com/ma/cambridge/codes/code_of_ordinances?nodeId=TIT2ADPE_CH2.129WECOOR_2.129.010PU.

[50] CfJJ Public Records Request to Lawrence Police Department, Aug. 7, 2025.

2. The total number of individuals detained pursuant to section 9.20.040.D, if any;
3. The total number of individuals transferred to ICE custody, if any;
4. The total reimbursements received from the federal government pursuant to any granted hold, administrative warrant, or notification request, organized by case."

According to the Deportation Data Project, in 2025, 31 people were transferred directly from Lawrence PD to federal ICE detention.[51] It is unclear if any of these transfers violated the Lawrence City Trust Act.

Many of the police departments without a policy are in cities or towns that do not have a sanctuary city ordinance. Not having any policy means that individual police officers are allowed discretion to decide when and how to communicate and share information with ICE. This causes inconsistent responses and uneven enforcement and degrades community trust in law enforcement.

iii. Departments that referred to their town or city ordinance

A relatively small number (6 out of 58) police departments did not have immigration policies, instead directing CfJJ to their city or towns immigration ordinance. Ordinances varied is restrictiveness, but tended to lean on the more restrictive side. For example, the Boston City Trust Act states that law enforcement officers "shall not" inquire about an individual's immigration status.[52] However, as mentioned above, not all police departments seem to adhere to their town or cities ordinance.

iv. Departments with restrictive policies

While the majority of current police department policies allow communication with ICE, and many departments provide no oversight or guidance on these matters at all, there are four examples of policies in

[51] Simon Rios, *More Than 7,000 ICE Arrests in Massachusetts so far Under Trump* (Apr. 1, 2026), https://www.wbur.org/news/2026/04/01/7000-ice-arrests-massachusetts-trump.

[52] Boston, Mass., Code of Ordinances § 11-1.9 (2019).

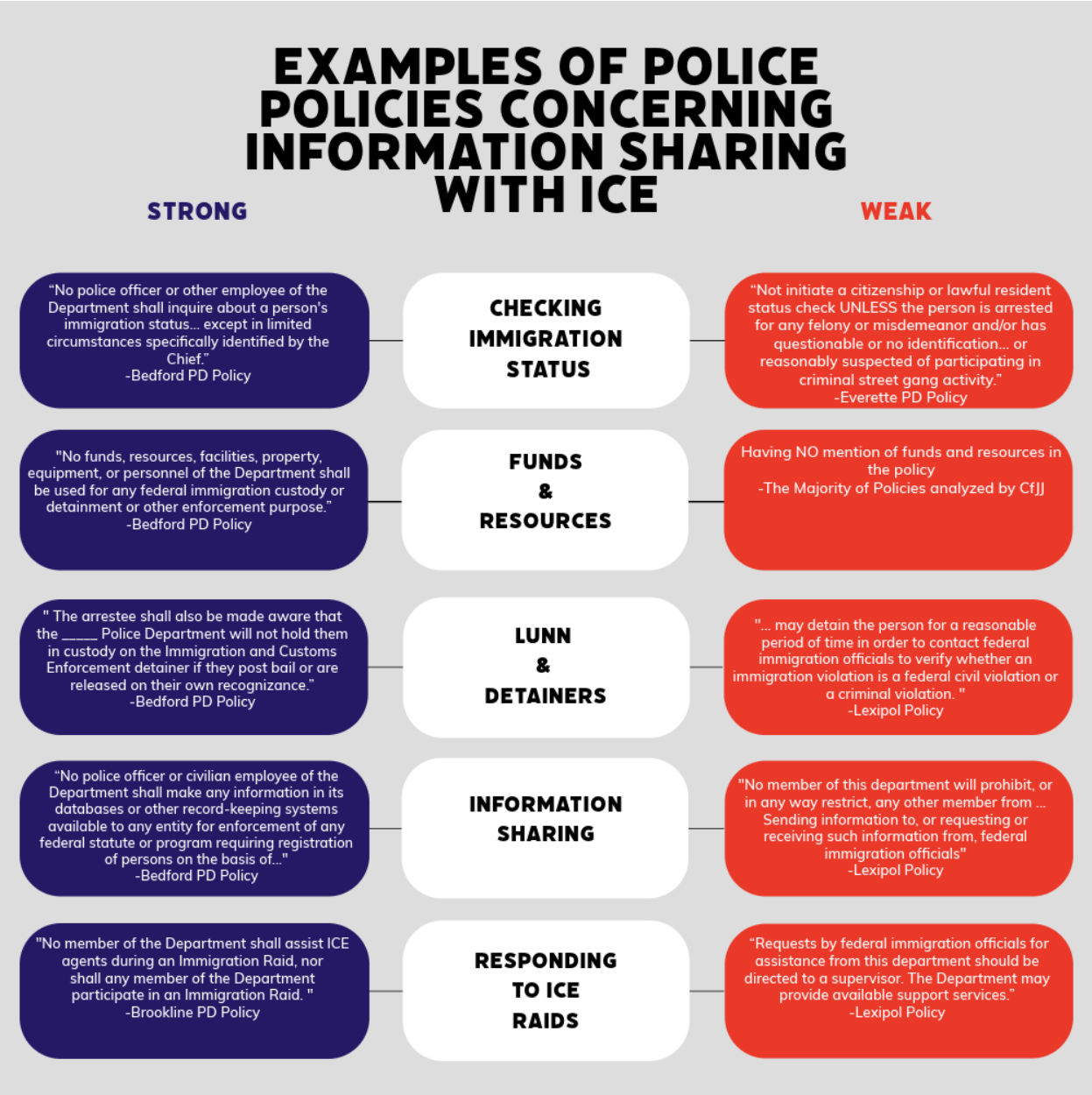
Massachusetts, that provide strong guardrails on the ways in which police can cooperate with federal immigration agencies. Brookline's "Federal Immigration Enforcement" policy and Bedford's "Immigration Policy" are examples of these policies.

The Brookline and Bedford policies include a number of general protections for immigrants, including not allowing immigration status checks except in "limited circumstances specifically identified by" the police chief, and not making information in police "databases or other record-keeping systems available to any entity for enforcement of any federal statute or program requiring registration of persons on the basis of race, gender, sexual orientation, gender identity, religion, national or ethnic origin, or political or social beliefs."[53] Brookline's policy also includes specific guidelines for police in the case of an immigration raid, stating that Brookline PD "shall notify the Town Administrator" of any "Immigration Raid which takes place in the Town" as soon as is "feasible," as well as stating that Brookline PD shall not "impede the rights of any person engaging in lawful peaceful protest or assembly."[54] While Brookline's participation in BRIC remains concerning, its stricter guidelines around requesting an individual's immigration status, sharing information with federal agencies, and reacting to ICE raids, provide materially stronger protections.

[53] General Order Number 43.0, *Federal Immigration Enforcement*, Brookline Police Department (Effective Dec. 17, 2024). https://www.cfjj.org/s/Brookline-PD-Immigration-Policy.pdf.

[54] *Id.* at 2, 3.

Figure 3: How to analyze police policies in Massachusetts concerning level of collaboration with ICE



The information used in this infographic has been obtained from Bedford PD, Brookline PD, Everette PD, and the Lexipol policy that is being used by Chicopee PD, Dracut PD, Tewksbury PD, and Shrewsbury PD.[55]

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[55] Bedford Police Department Policy https://www.cfjj.org/s/Bedford-PD-Immigration-Policy.pdf; Brookline Police Department Policy, https://www.cfjj.org/s/Brookline-PD-Immigration-Policy.pdf; Dracut Police Department Policy https://www.cfjj.org/s/Dracut-PD-Immigration-Policy.pdf; Everette Police Department Policy, https://www.cfjj.org/s/Everett-PD-Immigration-Policy.pdf; Lexipol Policy, https://www.cfjj.org/s/Chicopee-PD-Immigration-Policy.pdf, https://www.cfjj.org/s/Shrewsbury-PD-Immigration-policy.pdf, https://www.cfjj.org/s/Tewksbury-PD-Immigration-policy.pdf.

C. Police Collaboration with ICE in Massachusetts has had an enormous negative impact

The negative impact of policing policies that allow collusion with ICE are not just theoretical. Research shows that local police departments enforcing immigration laws erodes the public's trust in law enforcement, especially within immigrant communities.[56] Below are a short description of specific examples of police collusion with ICE in Massachusetts leading to ICE detentions, as well as data showing more than 200 ICE arrests straight from police departments across the Commonwealth.

Individual examples of police collaboration leading to ICE detention:

- In May 2025, five juveniles in Chelsea were detained by federal immigration authorities shortly after being arrested on misdemeanor offenses and fingerprinted by the Chelsea Police Department. When pushed on why these youth were fingerprinted after being arrested for misdemeanor offenses, the Chelsea City Manager said that officers were "following protocol" and "doing exactly what the Chelsea Police has been doing for a long time."[57] Further, an ICE case filing states, "On May 14th, 2025, a biometric ACRIMe referral brought the subject [redacted] to the attention of ICE officers. Criminal record checks, based on information in the referral, revealed that the Chelsea Police Department arrested [redacted]. . ."[58]
- In June of 2025, Tewksbury Police detained an individual on suspicion of a DUI and continued to hold this individual after he made bail in order to transfer them directly to ICE custody because of a civil immigration detainer. While this action is in line with the Lexipol immigration policy that Tewksbury adopted, the action also appears to conflict with the legal precedent in *Lunn v. Commonwealth*. Text

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[56] Meg Anderson, *Police Say ICE Tactics are Eroding Public Trust in Law Enforcement*, NPR (Mar. 30, 2025), https://www.npr.org/2025/03/30/nx-s1-5304236/police-say-ice-tactics-are-eroding-public-trust-in-local-law-enforcement; Charles Powers, *287(g): ICE Deputizing Local Law Enforcement Harms Migrants and Local Communities*, 5 IMMIGRATION AND HUMAN RIGHTS LAW REVIEW, Article 1. (2024), Available at: https://scholarship.law.uc.edu/ihrlr/vol5/iss1/1; Felipe M. Gonçalves, Elisa Jácome & Emily K. Weisburst, *Immigration Enforcement and Public Safety* (Nat'l Bureau of Econ. Research, Working Paper No. 32109, 2024), https://www.nber.org/system/files/working_papers/w32109/w32109.pdf.

[57] Sarah Betancourt, *Advocates Push for Juvenile Fingerprint Data Sharing to End, as ICE Detains Chelsea Teens*, WGBH (Jun. 25, 2025) https://www.wgbh.org/news/local/2025-06-18/advocates-push-for-juvenile-fingerprint-data-sharing-to-end-as-ice-detains-chelsea-teens?utm.

[58] Statement from I-213 form in filing to Immigration Court from DHS Opposition to Motion to Terminate. Filed April 8, 2026.

messages obtained through a PRR showed that officers referenced the Lexipol policy to determine how to act.[59]

- In September of 2025, ICE **co-responded** with Massachusetts State Police to a car accident and ICE detained an individual who had not committed a crime and was not intoxicated.[60] The Massachusetts State Police has not responded to CfJJ's PRR asking for department immigration policies and all communications in which an individual was taken from the department's custody directly into ICE custody.

The data: The Deportation Data Project has collected data from ICE to show that in Massachusetts since January 20, 2025, at least 210 ICE arrests have occurred "in association with 32 local police departments."[61] Even more alarming is that one third of these arrests occurred in Lawrence, Boston, and Lynn, which has 31, 21 and 18 arrests respectively. In comparison, under the final two years of the Biden administration fewer than 50 ICE arrests occurred in association with 15 police departments. Lawrence PD was listed as responsible for two arrests, Boston PD was listed as responsible for 14 arrests, and Lynn PD was listed as responsible for five arrests. The increase in arrests since January 20, 2025, shows that local and state law enforcement are working with ICE, despite their public messaging, including in the media and in testimony before the legislature, about not cooperating with federal immigration enforcement. The locations of the arrests also shows that Lawrence, Boston, and Lynn have collaborated with ICE on the highest frequency.

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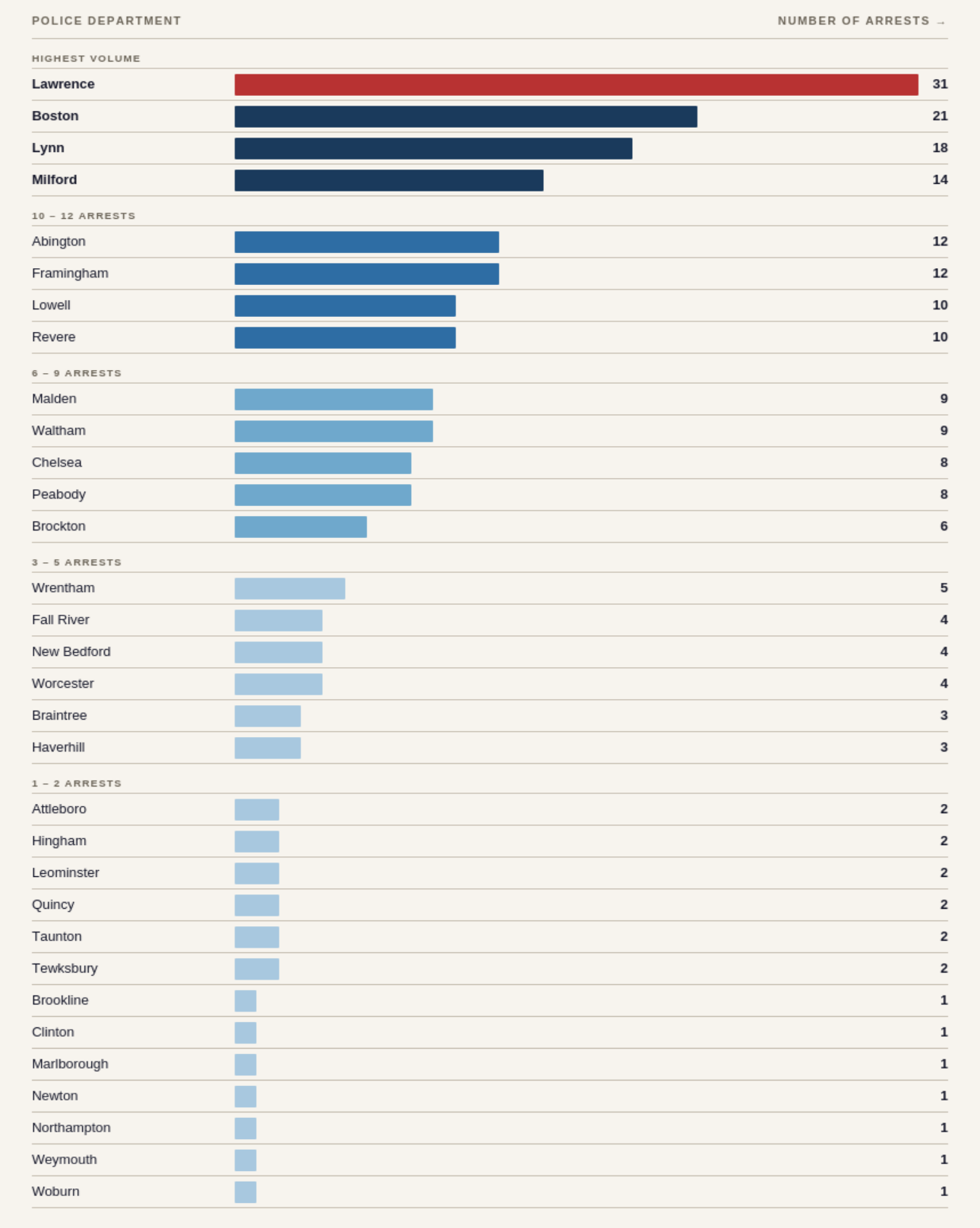
[59] Tewksbury Police Department, RE: Public Records Request - Records Request Immigration Info Sharing Policy and Comms (Feb. 19, 2026) (obtained via public records request by Nathan King).

[60] Documentation reviewed concerning client of Harvard Immigration and Refugee Clinical Program.

[61] Simon Rios, More That 7,000 ICE Arrests in Massachusetts so Far Under Trump, WBUR (Apr. 2, 2026), https://www.wbur.org/news/2026/04/01/7000-ice-arrests-massachusetts-trump.

Figure 4: ICE arrests associated with police departments



Deportation Data Project, https://ice-arrests.apps.deportationdata.org/

III. The Massachusetts Trial Court Allows and the Adult Carceral System Actively Facilitate Extensive Communication and Collaboration with ICE

A. County Sheriffs Collude Extensively with ICE and Most Refuse to Share Information with the Public About their Collusion

The majority of Massachusetts Sheriff departments (the entities that run the adult county jails and houses of corrections) regularly share extensive information about the people in their custody with ICE. The Sheriffs also regularly alert ICE before people with immigration detainers are released or are going to court. According to WGBH, the Worcester County Sheriff's office will proactively contact ICE to inform the agency of individuals in their custody that ICE may be interested in. Similarly, the Berkshire County Sheriff's ICE detainer policy states that "Whenever we have an inmate who has a pending ICE detainer and we know that person is going to be released or bailed, we should attempt to notify ICE in advance."[62] The Plymouth County Sheriff Department will notify ICE if an individual in their custody has an ICE detainer issued.[63] Prior to a change in policy, the Bristol County Sheriff Office offered to send ICE their "daily booking list of all new commits every morning,"[64] so ICE can take people directly from their custody. This level of sharing goes well beyond information that is publicly available and includes information that is not required by law. Almost all the Sheriffs in the Commonwealth are engaging in this conduct, which has been documented in recent media as well as emails obtained through public records requests from CfJJ.[65]

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[62] Berkshire County Sheriff's Department Jail and House of Corrections ICE Detainer Policy (Jan. 21, 2025).

[63] Sarah Betancourt, *How Do Mass. Sheriffs Interact with ICE? We Asked Them*, WGBH (Feb. 10, 2025), https://www.wgbh.org/news/local/2025-02-04/how-do-mass-sheriffs-interact-with-ice-we-asked-them.

[64] Email obtained from Bristol County Sheriff Office response to public records requests from CfJJ (Aug. 27, 2025).

[65] New Bedford Light. October 16, 2025. "How Mass. sheriffs navigate delicate balance of ICE demands and state law." https://newbedfordlight.org/how-mass-sheriffs-navigate-delicate-balance-of-ice-demands-and-state-law/.

The Bristol County Sheriff updated its policy in November 2025 to treat ICE detainers as public records requests.[66] The sheriffs have testified in favor of the PROTECT Act, though at the same time, some have shared that they work closely with ICE.[67]

CfJJ submitted public records requests to all the sheriff departments in August 2025 concerning the nature and extent of communication with ICE. Several sheriff departments declined to provide records, citing a federal regulation, 8 C.F.R. § 236.6, designed for agencies that hold ICE detainees.[68] In response, CfJJ has filed suit against Essex, Barnstable, Berkshire, and Middlesex sheriff departments, and challenges the applicability of the above-mentioned federal regulation.[69]

B. Massachusetts Trial Court Level Communications

The Massachusetts Trial Court's policy[70] allows court employees to share public information about a defendant or a witness with ICE, but they may not "initiate communications with ICE officers or employees."[71] The Trial Court policy also allows ICE to enter court facilities to take custody individuals. Court employees may not assist

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[66] "Bristol County Sheriff Restricting Information Sharing with ICE." Eleonora Bianchi and Anastasia E. Lennon, February 3, 2026. https://newbedfordlight.org/bristol-county-sheriff-restricting-information-sharing-with-ice/

[67] See Sheriff Testimony at March 4, 2026 House Committee on Public Safety and Homeland Security Public Forum, https://malegislature.gov/Events/SpecialEvents/Detail/442.

[68] Detention of Aliens for Violations of Status, 8 C.F.R. § 236.6 (2025). This regulation states that, "No person, including any state or local government entity or any privately operated detention facility, that houses, maintains, provides services to, or otherwise holds any detainee on behalf of the Service (whether by contract or otherwise), and no other person who by virtue of any official or contractual relationship with such person obtains information relating to any detainee, shall disclose or otherwise permit to be made public the name of, or other information relating to, such detainee."

[69] The file numbers are CfJJ v. Essex Sheriff (2684CV00600), Barnstable Sheriff (2684CV00738), Berkshire Sheriff (2684CV00739), and Middlesex Sheriff (2684CV00740).

[70] https://www.mass.gov/policy-statement/policy-and-procedures-regarding-courthouse-interactions-with-the-department-of-homeland-security

[71] Exec. Office of the Trial Court, Policy and Procedures Regarding Courthouse Interactions with the Department of Homeland Security, Mass.gov (May 1, 2025), https://www.mass.gov/policy-statement/policy-and-procedures-regarding-courthouse-interactions-with-the-department-of-homeland-security. The Trial Court policy is in line with the ruling in Ryan v. United States Immigration & Customs Enforcement, decided by the U.S. Court of Appeals for the First Circuit in 2020. In Ryan, the Court ruled that ICE arrests are permitted to take place in and around courthouses.

ICE in detaining an individual and may not detain someone for the sole purpose of aiding ICE.[72]

According to the Massachusetts Trial Court's own data, ICE made 726 arrests in state courthouses from January 2025 through February 2026.[73] In July, Juan Carlos Abarca-Jovel was detained by ICE on his way to the New Bedford District Court, where he was standing trial.[74]

While the Courts do know who has been arrested by ICE from their buildings, they do not know how many of its own cases concerning children are being impacted by ICE detentions. In response to an information request to the Juvenile Court, the Trial Court Administrator wrote that:

> *"First, the Trial Court does not collect data on the number of children who are the subject of proceedings in the Juvenile Court and who are detained by federal immigration authorities. The Juvenile Court is not necessarily notified if or when a child who is the subject of a Care and Protection proceeding is in federal immigration custody. Second, the Trial Court cannot determine (or to provide data about) the number of Care and Protection matters affected by ongoing immigration proceedings against parents."*[75]

By not collecting data on the number of cases impacted by ICE detentions, the Trial Court is showing an unconscionably low level of care for the people impacted by ICE actions, and by implication, for our own legal system.

The Massachusetts Trial Court has the inherent authority to set its own rules and had the ability to place strict limits on ICE activity in courthouses months, or even years, ago. While other state courts have set limits — Connecticut courts prohibit federal agents from making immigration arrests inside courthouses without a judicial warrant; Oregon courts ban civil arrests in and around courthouse premises; New Jersey policy

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[72] *Ryan v. U.S. Immigration & Customs Enforcement*, 974 F.3d 9 (1st Cir. 2020).

[73] Simón Rios, *More than 7,000 ICE Arrests in Massachusetts So Far Under Trump*, WBUR (Apr. 1, 2026), https://www.wbur.org/news/2026/04/01/7000-ice-arrests-massachusetts-trump.

[74] Kevin Andrade, *ICE Makes First Arrest In Weeks in the City's South End*, The New Bedford Light (Jul. 21, 2025), https://newbedfordlight.org/ice-makes-first-arrest-in-weeks-in-the-citys-south-end/.

[75] Letter from Thomas G. Ambrosino, Court Administrator, The Trial Court of Mass., To Joshua Dankoff (Sept. 8, 2025), https://www.cfjj.org/s/9-8-25-TGA-Response-Letter-CfJJ-re-Juvenile-Court-ICE-Custody.pdf.

does not allow civil immigration enforcement in its courthouses — the Massachusetts Trial Court has chosen to capitulate to the current federal system. This represents an unforced (though reversable) error in judgement that has led to tragic results for both our immigrant neighbors and for the rule of law.[76]

Conclusion: Local Cooperation with ICE Undermines Democratic Accountability

The current legal framework and police policies that allow collaboration and information sharing with ICE undermine core principles of the juvenile and criminal legal systems. Namely, these actions undermine the foundational principles that there is a presumption of innocence, due process with an opportunity to be heard in a court of law and to defend oneself against allegations against you with the right to an attorney. While the immigration system is 'civil' in nature, the Trump Administration has criminalized and militarized actions against immigrant residents such a degree that there are real-world consequences for a 'civil' immigration violation that are more akin to criminal punishment. These include arrest (including those that have occurred in aggressive and violent fashion), placement in detention (including situations where residents are often far away from family and community supports in inhumane conditions),[77] with little to no access to legal counsel and the possibility of deportation.

This is not just about immigration; it is about democracy more broadly. The details and manner of local police and state-level justice system collaboration with the federal government during the current authoritarian turn have implications that go well beyond

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[76] Maysoon Khan, *Connecticut Official Bans Masked ICE Agents, Warrantless Arrests in State Courts*, Conn. Pub. (Sept. 16, 2025), https://www.ctpublic.org/news/investigative/2025-09-16/connecticut-court-bans-ice-arrests-face-masks; Or. Chief Justice Order No. 19-095, *In the Matter of Out-of-Cycle Adoption of New Uniform Trial Court Rule 3.190* (Nov. 14, 2019), https://www.courts.oregon.gov/rules/UTCR/CJO_2019-095.pdf; Chief Justice Stuart Rabner, N.J. Sup. Ct., Directive #07-19, *Immigration-Related Policies: Revisions to Judiciary Forms; Updated Attorney General Guidance; Court Involvement with ICE Activities* (May 23, 2019), https://www.njcourts.gov/sites/default/files/notices/2019/05/n190523a.pdf.

[77] ACLU, *Detained Immigrants Detail Physical Abuse and Inhumane Conditions at Largest Immigration Detention Center in the U.S.*, December 8, 2025 (Updated April 13, 2026). https://www.aclu.org/news/immigrants-rights/detained-immigrants-detail-physical-abuse-and-inhumane-conditions-at-largest-immigration-detention-center-in-the-u-s.

the immigrant community. ICE is not just acting like a paramilitary force: it is one.[78] If our local police officers and institutions are buddied up to ICE in its harsh response to immigration, it is going to be much harder to disentangle these entities if or when ICE is called out to 'monitor' local elections in November. It would behoove us to remember Lesson 6 of Timothy Snyder's *On Tyranny: Twenty Lessons from the Twentieth Century*:

> *"Be wary of paramilitaries. When the men with guns who have always claimed to be against the system start wearing uniforms and marching with torches and pictures of a leader, the end is nigh. When the pro-leader paramilitary and the official police and military intermingle, the end has come."*[79]

Our democracy requires that we urgently establish barriers between local law enforcement and the federal policing enterprise at this moment.

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[78] Erica De Bruin, *ICE Not Only Looks and Acts Like a Paramilitary Force – It Is One, and That Makes It Harder to Curb*, The Conversation (Jan. 29, 2026), https://theconversation.com/ice-not-only-looks-and-acts-like-a-paramilitary-force-it-is-one-and-that-makes-it-harder-to-curb-274580.

[79] Timothy Snyder (2017). "On Tyranny: Twenty Lessons from the Twentieth Century." (New York: Penguin Random House).

IV. Recommendations

Given the broad implications for democracy that are invoked by the porous nature of information sharing between our local justice system and the federal immigration system, these recommendations are structured first with general principles that should apply across the Commonwealth, followed by actions that are directed towards for specific agencies.

Recommendation 1: Defend our state level justice system institutions, including the justice and court systems.

Lesson 2 of Timothy Snyder's 2017 *On Tyranny: Twenty Lessons from the Twentieth Century* reads: "**Defend institutions**. It is institutions that help us to preserve decency. They need our help as well. Do not speak of "our institutions" unless you make them yours by acting on their behalf. Institutions do not protect themselves. They fall one after the other unless each is defended from the beginning. So choose an institution you care about—a court, a newspaper, a law, a labor union—and take its side."[80]

If we have any faith in our state's own legal system, then legal system processes, from initial police contact through plea or trial, should run their course. We should not allow local and state-level actors (including police departments, court staff, or the sheriff's department staff) to alert ICE to the whereabouts of an individual who may or may not be undocumented, which can, and does, lead to their immediate detention before due process plays out in our state court system. We are seeing our juvenile and criminal justice systems being co-opted and short-circuited by the federal immigration practices that readily remove individuals who still bear a presumption of innocence with respect to the allegations against them before their court cases can play out.

[80] Ibid.

Recommendation 2: Avoid policies that further a false "Good Immigrant/Bad Immigrant" narrative.

We should not acquiesce to the federal deportation machine's rhetoric to rush to get supposedly 'bad' people off the streets. Unfortunately, our own state's leadership and policies have enabled and empowered the localization and negative rhetoric concerning so called 'bad immigrants.' According to Governor Healy:

> *"Massachusetts is not a sanctuary city [sic]. . . We have a regular working relationship with ICE. ... I'm all for getting the bad guys, but I think what we're seeing and what I've spoken out against, is the apprehension of people who are not bad guys."*[81]

While this statement makes for a 'tough on crime' soundbite, and attempts to distinguish between 'good' and 'bad' immigrants, it glosses over the question of who the 'bad guys' are and, more importantly, who gets to decide that? The federal authorities are painting entire communities—the entire immigrant community and especially immigrant communities of color—as 'bad guys,' which is not just flawed and inherently false (as immigrant communities commit fewer crimes than US citizens),[82] but deeply and fundamentally racist and contrary to an ethic of care that these communities deserve. ICE is posted up in our communities and in our courts. If you're a victim and want a restraining order, ICE is both inside and outside the courthouses; ICE is waiting outside of schools, and community centers. Despite rhetoric branding immigrants as lazy and living off the system, ICE is posted outside of places of employment targeting honest, hard-working immigrant residents. Parents are withdrawing their children from school districts and leaving the state out of fear that their children will not return home from school due to being taken by ICE.[83] These narratives have long driven problematic policies and practices that have created

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[81] *Massachusetts Gov. Healey Defends Immigration Record from Opponents: "I'm All for Getting the Bad Guys"*, CBS Bos. (July 6, 2025), https://www.cbsnews.com/boston/news/massachusetts-maura-healey-republican-criticism/

[82] Kristin F. Butcher & Anne Morrison Piehl, *Why Are Immigrants' Incarceration Rates so Low? Evidence on Selective Immigration, Deterrence, and Deportation* (Nat'l Bureau of Econ. Rsch., Working Paper No. 13229, 2007), https://www.nber.org/system/files/working_papers/w13229/w13229.pdf.

[83] Boston.com, "Immigrant student enrollment is dwindling at schools across the U.S." November 17, 2025, https://www.boston.com/news/education/2025/11/17/immigrant-student-enrollment-dwindling-schools/. Citing Chelsea Public Schools and the fact that "Since January, 844 students have withdrawn from the district."

significant harm in communities of color and this cannot be allowed to continue to happen in our diverse state.

Recommendation 3: The Legislature should adopt an expanded PROTECT Act, including clear guidelines limiting surveillance and information sharing with ICE, and limiting transmission fingerprints to federal authorities after arrest.

The PROTECT Act, passed by the House in late-March, provides a good framework for providing guardrails for local police practice concerning information sharing and collaboration with ICE. However, the details really matter for what legislation will ultimately get passed, and the legislature should consider the following.

First, the Massachusetts state legislature should create stricter rules around when fingerprints should be shared with federal authorities. This includes not allowing police to take fingerprints unless specifically required by state law, given current police practice to consistently collect fingerprints when the law says 'may.' The legislature should also strictly ban the **transmission** of juvenile fingerprints with the FBI (and therefore ICE), a provision of which is included in both "An Act promoting diversion of juveniles to community supervision and services" (H.1695/S.1051) and "An Act Relative to Expungement of Juvenile and Young adult records" (H.1657/S.1058). This would ensure further and needed protection for minors in the Commonwealth, which is very much needed given the number of youth who have been removed and taken into immigration custody in the absence of these guardrails.

Second, the Legislature should enact statutory limits in our General Laws on the ability of sheriff's departments and other local law enforcement agencies to share information with federal immigration authorities, only leaving exceptions where sharing is directly required by federal law or tied to an active criminal case. Requests for information from ICE could be treated as public records requests, or the Commonwealth can take a page from the Los Angeles County Sheriff's Department policy which clearly states that: "If a victim's, witness' or offender's immigration status is discovered during an

investigation, deputies shall not forward that information to US Immigration and Customs Enforcement (ICE)."[84]

Third, California's "CA Values Act" provides a strong model from which to model similar Massachusetts or municipality laws or ordinances.[85] One provision that could be considered is language that law enforcement agencies shall not "use agency or department moneys or personnel to investigate, interrogate, detain, detect, or arrest persons for immigration enforcement purposes," including by "providing information regarding a person's release date" or "the individual's home address or work address."

Fourth, the legislature should consider removing the carve outs that reference chapter 265 in section 3(b)(2)(iv) of the House-passed version of the PROTECT Act.[86] These allow for greater information sharing between law enforcement (especially sheriffs) and ICE, which are not needed.

Fifth, the legislature should consider ordering a study that explores the impact across the Commonwealth of municipal participation in federal policing taskforces, including but not limited to ICE/Homeland Security Investigations (HSI) taskforces. This study should be made publicly available and be shared with the legislature to inform further policy reform in this area.

Recommendation 4: The Legislature should increase guardrails on police surveillance, including regulating so-called 'gang databases' and limit the use and information sharing associated with license-plate readers and facial surveillance.

Gang databases: Considering the troubling and problematic racial disparities and civil liberties concerns inherent in maintaining gang databases, both the legislature and

[84] L.A. County. Sheriff's Department, *Policy Regarding Immigration Inquiries and Notification*, Policy § 05-09/271.00, https://lasd.org/policy-regarding-immigration-inquiries-and-notification/.

[85] S.B. 54, 2017–2018 Leg., Reg. Sess. (Cal. 2017), https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB54.

[86] An Act promoting rule of law, oversight, trust and equal constitutional treatment. House Bill 5316, Massachusetts 194th General Court. https://malegislature.gov/Bills/194/H5316

municipalities should comprehensively re-think the collection and use of alleged gang membership information, with strong consideration given to abolishing and prohibiting these databases. Gang databases are effectively a tool of racialized surveillance that perpetuate criminalization, state violence, and systemic oppression under the guise of public safety and their disproportionate impact on communities of color are well documented. These databases overwhelmingly target Black and Brown communities, reinforcing cycles of policing, incarceration, and deportation rather than addressing the root causes of harm. It is highly questionable whether any level of reform, regulation, or oversight can undo the fundamental injustice of tracking, labeling, and punishing individuals based on vague, subjective, and often unsubstantiated criteria. And the stigma on individuals who are wrongly implicated and included on these databases, including increased stops and invasive encounters with law enforcement, is unacceptable. The very existence of gang databases legitimizes a system that surveils and punishes marginalized communities while failing to provide the resources and support that foster true community safety.

If both state and local officials decide to continue to allow the practice, at the very least, the legislature should strongly regulate gang databases, creating a common standard across the Commonwealth with due process and civil liberty guardrails for their use and ongoing oversight. Specifically, the state legislature should require municipalities and regional Fusion Centers that collect gang information to adopt requirements, including but not limited to:

- Implementing a clear procedure for identifying how someone gets on such a so-called gang member list, including the strict record keeping of justifications used for any points system and definitions for any criteria used.
- Removing trivial and non-criminal activity, such as "Observed Association" from all points systems.
- Requiring immediate notification of individuals who have been added to a database and providing a fair procedure for meaningfully challenging and appealing having been identified as gang involved.
- Requiring a regular and thorough audit and review process that includes regular removal of inactive or falsely identified individuals.

- Restricting the use of gang status, inclusion on a gang database, and/or gang packets in all court procedures that are not directly related to gang activity, namely, civil and immigration courts.

License plate readers and facial surveillance: The legislature should limit the use of law enforcement license plate readers and facial surveillance technology, including the sharing of information into federal databases.

Recommendation 5: The Trial Court should pass its own rules to not allow ICE into court buildings and prohibit information sharing from its employees to ICE.

The Massachusetts Trial Court's inherent authority allows it to set its own rules with respect to the courthouses under its supervision. As such, the Trial Court should proactively enact rules that strictly limit ICE access, activity and arrests in courthouses, or on court property, following the example of other states like Connecticut, Oregon, and New Jersey.[87]

Recommendation 6: The Governor should cancel the one 287(g) agreement in the state between the MA DOC and ICE.

Massachusetts is the only Democratically controlled state in the country with a statewide 287(g) agreement.[88] The PROTECT Act, which targets local and state collaboration with ICE, has a carve out allowing the current 287(g) agreement to continue. This sets a bad example for the sheriffs and other law enforcement officials in

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[87] Maysoon Khan, *Connecticut Official Bans Masked ICE Agents, Warrantless Arrests in State Courts*, Conn. Pub. (Sept. 16, 2025), https://www.ctpublic.org/news/investigative/2025-09-16/connecticut-court-bans-ice-arrests-face-masks; Or. Chief Justice Order No. 19-095, *In the Matter of Out-of-Cycle Adoption of New Uniform Trial Court Rule 3.190* (Nov. 14, 2019), https://www.courts.oregon.gov/rules/UTCR/CJO_2019-095.pdf; Chief Justice Stuart Rabner, N.J. Sup. Ct., Directive #07-19, *Immigration-Related Policies: Revisions to Judiciary Forms; Updated Attorney General Guidance; Court Involvement with ICE Activities* (May 23, 2019), https://www.njcourts.gov/sites/default/files/notices/2019/05/n190523a.pdf.

[88] Alex Burness, *Inside ICE's Only Contract with a Blue State*, Bolts (Feb. 9, 2026), https://boltsmag.org/massachusetts-prisons-contract-with-ice/.

Massachusetts, as it shows that the Commonwealth is still willing to work and collaborate with ICE. Removing the 287(g) agreement between the MA DOC and ICE would set an example across the entirety of the Commonwealth of a refusal to collaborate with ICE.

Recommendation 7: Municipalities and County Sheriffs should set clear guidelines to limit surveillance and information sharing with ICE through City Ordinance, Executive Order, and Police Policy.

Local police departments with existing immigration policies should review and revise them to ensure that they follow state law and provide adequate protections for immigrant residents of their city or town. Town and city councils should also review existing sanctuary ordinances to ensure they provide maximum immigrant protections. If a town or city does not currently have a sanctuary policy, these local governmental bodies should begin the process to create and implement one to ensure a clear understanding for all residents. These policies and ordinances must include language that ensures there is a process to hold police officers and city officials accountable if they assist ICE in violation of these policies. County Sheriffs and their staff should not undermine ongoing Massachusetts criminal cases by deciding to share information about the people in their custody pretrial with ICE or facilitate transfers of custody of those people to ICE, pre- or post-sentencing. Any resident held on a charge that has not advanced to a plea or a trial should see their case come to a final resolution without being interrupted by civil immigration proceedings.

Recommendation 8: The AGO and POST Commission should expand accountability and oversight for law enforcement playing too nice with ICE.

The Attorney General's Office should consider a comprehensive review of immigration related police policies and practices and provide both guidance and remedial correction to police and sheriff departments whose policies and practices are not in

line with *Lunn*, Massachusetts Equal Protection laws, or any new language from the PROTECT Act, should that legislation be signed into law.

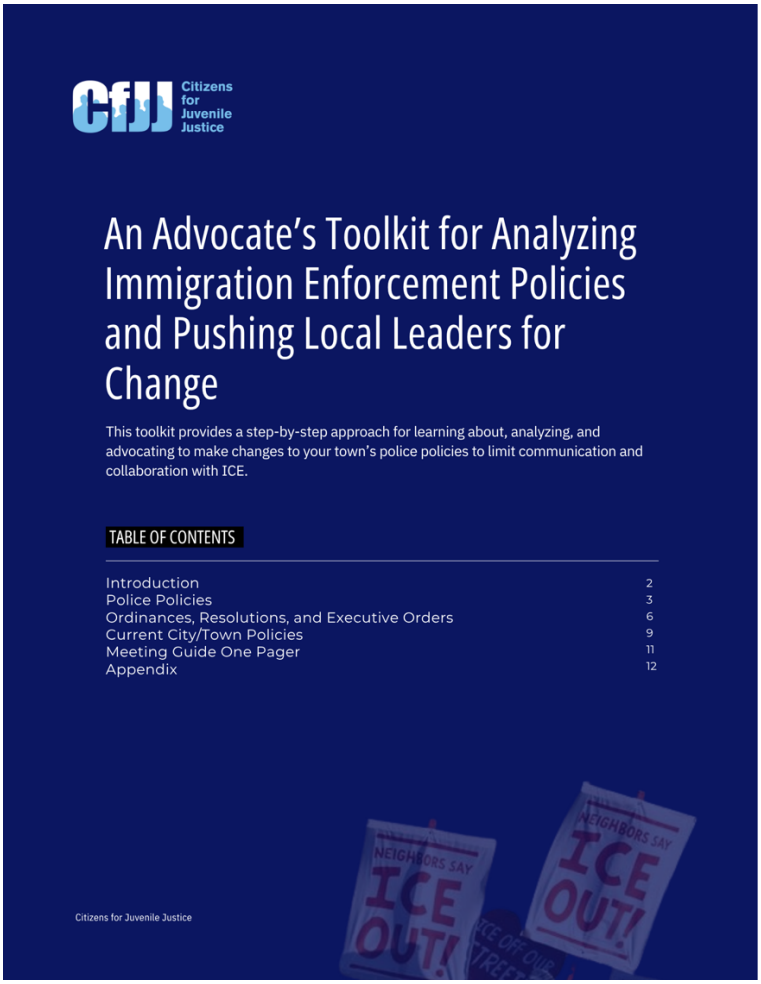
The POST Commission should use its law enforcement oversight function to develop comprehensive methods to hold police departments, individual officers and sheriff's departments accountable for violating immigration-related information sharing policies. The POST Commission should also use its agency certification authority to mandate that police departments are required to have and abide by policies that limit police cooperation with federal authorities engaging in immigration enforcement, especially when they engage with youth.

It is very hard to track individual police officers' text message or phone call communication with individual ICE officers, even if such communication is outside their own departmental policy. That is why accountability for breaking these rules is super important. Despite recent CfJJ efforts to document these communications via public records requests, we believe that we have only scratched the surface regarding the extent of communication and collaboration with ICE.

The POST Commission's agency certification standards provide a unique opportunity to protect not just our immigrant neighbors, but also to ensure that our police departments do not facilitate the short circuiting of the Massachusetts juvenile and criminal legal systems by enabling the detention and deportation of people who come in contact with police but who have not had their appropriate "day in court". One immediate way to move in this direction is to ensure that the current drafting of 555 CMR 13.03(6)(k) includes stronger guardrails to protect children from ICE. POST should look carefully at whatever legislation emerges from the legislature, if that happens, and promulgate regulations in line with any information-sharing prohibitions that are included both prior and after arrest.

Appendix: An Advocate's Toolkit for Analyzing Immigration Enforcement Policies and Pushing Local Leaders for Change

While there is hope that the Massachusetts Legislature will pass laws to provide state level guardrails to ICE communication and collaboration (such as through the PROTECT Act (H.5316)), **municipal level advocacy can help put pressure on your city or town's police department to update policies and improve practice to be more protective of our immigrant neighbors**. Even if the PROTECT Act passes, municipalities will need to implement the changes and can always go further than state law to protect their immigrant residents. **CfJJ developed this toolkit to provide a step-by-step approach for learning about, analyzing, and advocating to make changes to your city or town's police policies to limit communication and collaboration with ICE.**



Citizens for Juvenile Justice

An Advocate's Toolkit for Analyzing Immigration Enforcement Policies and Pushing Local Leaders for Change

This toolkit provides a step-by-step approach for learning about, analyzing, and advocating to make changes to your town's police policies to limit communication and collaboration with ICE.

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The toolkit can be accessed at https://www.cfjj.org/ice-out.

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Citizens for Juvenile Justice

Founded in 1994, Citizens for Juvenile Justice (CfJJ) is the only independent, non-profit, statewide organization working to improve the juvenile justice system in Massachusetts. As an independent research and policy organization, we are uniquely positioned to understand and advocate for the whole system – Juvenile Justice and the other child- and youth-serving systems that often feed into juvenile justice. We don't represent individual juvenile clients. Instead, we try to change the way the entire system operates. We advocate for smart policies that prevent crime, help youth develop into responsible adults, and use resources wisely. Our work includes advocacy with the legislature and the executive agencies, research, convening and coalition building, public education and media outreach.

CfJJ's mission is to advocate for statewide systemic reform that achieves equitable youth justice. This includes fair and effective systems that promote positive development and successful outcomes for young people. CfJJ works to ensure that Massachusetts includes kids in the juvenile system who are currently consigned to the adult system, keeps kids out of the juvenile system who don't belong there, and treats youth who are in the system fairly and effectively. Our goal is to ensure not just a fair and effective juvenile justice system, but fair and developmentally appropriate child-serving systems that prevent vulnerable youth from entering the juvenile justice system.

Citizens for Juvenile Justice

44 School St | Suite 415

Boston, MA 02108

617.338.1050 | cfjj.org

Introduction

An Advocate's Toolkit for Analyzing Immigration Enforcement Policies and Pushing Local Leaders for Change

April 2026

These are not normal times; this is a moment of serious democratic backsliding by our federal government. Part of this backsliding includes federal focus and investments toward detaining and deporting immigrants with an intensity never seen before. Immigration enforcement is controlled by the federal government and is not supposed to be the role of local law enforcement. Some elected officials, including the Governor, Attorney General, and the Boston Mayor have expressed their support of the immigrant community as well as concern over Immigration and Customs Enforcement (ICE) practices. At the same time, however, many local police and sheriff departments share information with and collaborate with federal immigration enforcement, with local law enforcement effectively acting as 'force multipliers' for the federal deportation regime. Research has shown that local collaboration with ICE does not improve public safety, rather it discourages people from contacting the police and discourages people from coming forward as a witness to a crime.

While there is hope that the Massachusetts Legislature will pass laws to provide state level guardrails to ICE communication and collaboration (such as through the PROTECT Act (H.5316)), **municipal level advocacy can help put pressure on your city or town's police department to update policies and improve practice to be more protective of our immigrant neighbors**. Even if the PROTECT Act passes, municipalities will need to implement the changes, and can always go further to protect our immigrant community members.

This toolkit provides a step-by-step approach for learning about, analyzing, and advocating to make changes to your town's police policies to limit communication and collaboration with ICE.

The types of policies that can constrain police collaboration are:

- Police department policies - Internal department policies issued by a Police Chief and enforced by the police department.
- Municipal ordinances and resolutions - Legislative acts passed by a town council. Ordinances create binding law that is enforced by the city, while resolutions represent an unenforceable statement.
- Mayoral executive orders - Created and implemented by a town's mayor; Executive Orders are legally binding directives.

You can navigate to other parts of this toolkit using the tabs to the left.
Continue on to the Police Policies tab.
For more information or support, please contact Joshua Dankoff at joshuadankoff@cfjj.org

Changing police policy is important, however it is not a magical solution to police surveillance. Surveillance information collected by the Boston Regional Intelligence Center (BRIC) and Massachusetts Fusion Center, as well as license plate readers used by Flock and other companies continue to pose major concerns for the safety and freedom of everyone regardless of immigration status. To find more information about fusion centers in Massachusetts and what can be done to eliminate them, click here.

Police Policies

Identifying, Analyzing, and Changing Police Policies Regarding Communication with ICE

Many police departments have policies that direct their officers about whether and when to share information or collaborate with ICE. Many do not. Under the current (March 2026) legal framework in Massachusetts, police departments have wide discretion on what goes into these policies, and advocacy at the municipal level can help make change.

Follow these steps to find, analyze, and advocate for change of police policies concerning communication with ICE.

Step 1: Requesting your local police department's policy:

- Check here to see if your department's policy has already been gathered by CfJJ. Note that this information is only updated as of January 2026.
- If your local police department's policy is not above, you can submit a Public Records Request (PRR) to your police department requesting their policy.
    - A template PRR for requesting immigration enforcement policies can be found here.
    - More information about submitting PRR's can be found here.

Step 2: Understanding and analyzing the policy (key points to look for)

Once you have your town's police policy, ask these 7 questions:

- *In what circumstances are officers allowed to check immigration status?*

    § **Red flags:** Allowing checks on immigration status during public police encounters, checking immigration status for those under police surveillance, checking immigration status as a standard part of the booking process after arrest, or with a long list of exceptions/reasons when checking immigration status is allowed/required.

    § **Green flags:** Strong wording that does not allow an officer to check immigration status except when required by law. An example from the Brookline PD policy is as follows: "No police officer or other employee of the Department shall inquire about a person's immigration status… except in limited circumstances specifically identified by the Chief and approved by the Board in public session as not inconsistent with this Policy."

- *Are officers allowed to share information with ICE?*

§ **Red flags:** Allowing communication with ICE in the following circumstances:

- If an arrestee has a civil immigration warrant or administrative warrant
- If an arrestee has previously been convicted of a misdemeanor or nonviolent felony
- If sharing information "serves a public safety interest"
- If an arrestee is SUSPECTED of street gang activity

§ **Green Flags:** Not allowing communication with ICE except when required by law.

- *Does the policy adhere to the Lunn v. Commonwealth court ruling?*

§ **Red flag:** "An officer who has a reasonable suspicion that an individual already lawfully contacted or detained has committed a criminal violation of federal immigration law may detain the person for a reasonable period of time in order to contact federal immigration officials to verify whether an immigration violation is a federal civil violation or a criminal violation." (example taken from Chicopee Policy 413)

§ **Green flag:** Lunn v. Commonwealth is mentioned in policy and there is acknowledgement that police cannot extend an individual's detention for a civil immigration detainer.

- *What should a police response to an immigration detainer be?*

§ **Red flags:** No mention of making an arrestee aware if they have an immigration detainer. Requiring that civil immigration detainers are added to an individual's police file.

§ **Green flags:** requiring that an arrestee is notified when ICE sends the department a detainer for them. Not allowing civil immigration detainers to be added to an individual's police file.

- *What are police authorized to do during ICE raids?*

§ **Red flags:** allowing broad assistance when "requested"

§ **Green flags:** Specifically stating that officers shall not directly assist ICE and limiting officer assistance to keeping the peace, requesting ICE clearly identify themselves, requesting prior notice for when ICE is planning on conducting raids, requiring the department to independently verify ICE warrants.

- *Are there limits to the funds and resources that local police are allowed to use for immigration enforcement?*

  § **Red flags:** No mention of limiting what departmental funds and resources may be used for the sole purpose of immigration enforcement

  § **Green flags:** Look for the following: "No funds, resources, facilities, property, equipment, or personnel of the Department shall be used for any federal immigration custody or detainment or other enforcement purpose."

- *Is there a ban on 287(g) agreements?*

  § **Red flag:** No mention of 287(g) agreement ban

  § **Green flag:** Specifically states that the department shall not enter into a 287(g) agreement

Examples of a stronger and weaker police policy

Strong model: Bedford Policy

- **Specific language that makes this policy strong:**
  - **Checking immigration status:** "No police officer or other employee of the Department shall inquire about a person's immigration status, nor shall such officer or employee take any policing action against a person based solely on the person's real or suspected immigration status, except in limited circumstances specifically identified by the Chief."
  - **Limiting funds and resources:** "No funds, resources, facilities, property, equipment, or personnel of the Department shall be used for any federal immigration custody or detainment or other enforcement purpose."
  - **Detainers & Lunn Acknowledgement:** "If, in the course of standard processing procedures, Immigration and Customs Enforcement files an immigration detainer, the arrestee shall be made aware of the detainer and provided a copy. The arrestee shall also be made aware that the Bedford Police Department will not hold them in custody on the Immigration and Customs Enforcement detainer if they post bail or are released on their own recognizance."
  - **Information Sharing:** "No police officer or civilian employee of the Department shall make any information in its databases or other record-keeping systems available to any entity for enforcement of any federal statute or program requiring registration of persons on the basis of race, gender, sexual orientation, gender identity, religion, national or ethnic origin, or political or social beliefs."

- **Where this falls short:** There is wide discretion for sharing information with ICE, there are not limits on sharing fingerprints with ICE, The Chief of Police can approve immigration status checks without having a public meeting to obtain the public's approval

Weak model: Lexipol Policy (Chicopee, Tewksbury, Shrewsbury)

- **Specific language that makes this policy weak:**
  - **Checking Immigration Status:** "An officer who has a reasonable suspicion that an individual already lawfully contacted or detained has committed a criminal violation of federal immigration law may detain the person for a reasonable period of time in order to contact federal immigration officials to verify whether an immigration violation is a federal civil violation or a criminal violation."
  - **Funds and Resources:** "Requests by federal immigration officials for assistance from this department should be directed to a supervisor. The Department may provide available support services."
  - **Information Sharing:** No member of this department will prohibit, or in any way restrict, any other member from doing any of the following regarding the citizenship or immigration status, lawful or unlawful, of any individual (8 USC § 1373):
    - Sending information to, or requesting or receiving such information from, federal immigration officials
    - Maintaining such information in department records
    - Exchanging such information with any other federal, state, or local government entity

Step 3: What to do about problems with my police department's immigration enforcement policy?

- Share your findings with other local advocacy groups.
- Advocate for policy changes at your local **city/town council meeting**.
- Request to sit down with your town's chief of police, mayor, city manager, and/or city/town council members to discuss your concerns. Use this one pager to help guide the meeting.
- Write a letter to the editor (find templates here).

Ordinances, Resolutions, Bylaws, and EO's

Ordinances, Resolutions, Bylaws, and Executive Orders

While ordinances, resolutions, and Executive orders are both municipally passed documents, there are key differences between them:

Ordinances:

1. Must be officially passed by the local legislative body, usually the city council.
2. When passed, becomes law
3. Become permanent unless they are repealed

Resolutions:

1. A formal expression of a local legislative body's opinion
2. Does not become an enforceable law
3. Primarily used to address temporary scenarios instead of permanent problems

Executive Orders:

1. Passed by the Mayor, not voted on by the town council
2. It is an enforceable administrative authority

Which is better and why?

Resolutions do not create meaningful change as they do not create enforceable rules. **Resolutions can provide a false sense of safety, as they don't have a way to "walk their talk."** If your town only has a resolution, push them to pass an ordinance.

Step 1: Finding your town's municipal immigration ordinance or resolution

City ordinances and resolutions are easier to locate as compared to police department policies as they are always posted publicly. Most cities make their ordinances and resolutions easily accessible with an internet search, while others bury their ordinances and resolutions behind submenus of the cities website. First, Google your town and state, followed by "immigration ordinance or resolution." In the rare case that you know your city or town has an ordinance or resolution but you are unable to access it, you may need to submit a public records request. To find a template for submitting a public records request, click here.

Finding your Mayors Executive Order

If your town has an executive order covering immigration, it should be very easy to locate with a google search. Look up your town and state, followed by the words "immigration executive order," and it should come up. Many towns do not have executive orders covering immigration, so do not be surprised if you cannot find one for your town.

Step 2: Understanding and analyzing the document (ordinance, resolution, or executive order):

- *What are the guidelines for asking about an individual's immigration status?*
  - **Red Flags:** Allowing city employees to inquire about an individual's immigration status, or not mentioning immigration status checks
  - **Green flags:** Not allowing city employees to inquire about anyone's immigration status, including arrestees.
  - **Good example from Cambridge Welcoming Community Ordinance:** "Inquiries about immigration status. City employees and officials may not inquire about the immigration status of any victim, suspect, arrestee, 911 caller, or other member of the public with whom they have contact, except as required by 8 U.S.C. § 1373."
- *What are the guidelines for sharing information with ICE?*
  - **Red Flags:** Allowing information sharing with ICE, or not mentioning information sharing in the ordinance.
  - **Green flags:** Restricting the sharing of information with ICE except in circumstances where sharing information is required by law (such as in the case of judicial warrants).
  - **Good example from Cambridge Welcoming Community Ordinance:** "No officer or employee of the Cambridge Police Department shall provide an officer or employee of ICE with the following information relating to a person in the custody of the Police Department: information about an individual's incarceration status, length of detention, home address, work address, personal information other than citizenship or immigration status, hearing information, or pending release, except information that is available through the Massachusetts Public Records Laws, G.L, c. 66, section 10 and G.L. c. 4, section 7 (twenty-sixth)."
- *What are the reporting requirements?*
  - **Red flags:** No reporting requirements.
  - **Green flags:** Requiring police departments to report detailed information of all encounters between them and ICE and to make this report available to the public after necessary redactions have been made.
  - **Good example from Cambridge Welcoming Community Ordinance:** "Beginning on the date of passage of this Chapter and every six months thereafter, the Cambridge Police Commissioner shall submit a report, with the information detailed below, to the City Clerk, with a copy to the City Manager, and the City Clerk shall include the report on the agenda of the next-occurring meeting of the Public Safety Committee of the City. The report shall contain:
    1. A statistical breakdown of the total number of ICE detainers requests and, administrative warrants lodged with Cambridge Police Department;

2. The total number of individuals detained as a result of an ICE detainer or administrative warrants, if any;
3. The total number of individuals transferred to ICE custody, if any;
4. The total reimbursements received from the federal government pursuant to any granted ICE detainer or administrative warrant, organized by case;
5. The total number of investigations where the Cambridge Police Department cooperated with or provided information to ICE unless any part of such information cannot be publicly disclosed."

- *What are the guidelines for using municipal funds and resources to assist with civil immigration enforcement?* ***(Found ALMOST exclusively in EO's)***
    - **Red flags:** Not mentioning how city funds and resources may be used relating to immigration enforcement OR specifically allowing city funds and resources to be used for immigration enforcement.
    - **Green flags:** Not allowing city funds and resources to be used for immigration enforcement.
    - **Good example from Brookline Town Ordinance: "**No funds, resources, facilities, property, equipment, or personnel of the Department shall be used for any federal immigration custody or detainment or other enforcement purpose."

Step 3: What to do about problems with my police department's immigration enforcement policy?

- Share your findings with other local advocacy groups.
- Advocate for policy changes at your local city/town council meeting.
- Request to sit down with your town's chief of police, mayor, city manager, and/or city/town council members to discuss your concerns. (Use this one pager to help guide the meeting)
- Write a letter to the editor (find templates here).

Current City/Town Policies

Citizens for Juvenile Justice

What policies does my city/town have in place regarding communication with ICE?

City / Town	Police Dept. Policy	City/town Ordinance/Bylaw	City/town Resolution	City/town Executive Order
Amherst	Yes	No	Yes	No
Andover	Yes	No	No	No
Arlington	Yes	No	No	No
Barnstable	No	No	No	No
Bedford	Yes	No	No	No
Beverly	Yes	No	Yes	Yes
Boston	Yes	Yes	No	Yes
Braintree	No	No	No	No
Brockton	No	Yes	No	No
Brookline	Yes	Yes	No	No
Burlington	No	No	No	No
Cambridge	No	Yes	No	Yes
Chelsea	No	No	Yes	No
Chicopee	Yes	No	No	No
Dracut	Yes	No	No	No
Everett	Yes	No	No	No
Fall River	No	No	No	No
Falmouth	No	No	No	No
Framingham	Yes	Yes	No	No
Haverhill	Yes	No	No	No

Holyoke	Yes	No	No	Yes
Lawrence	No	Yes	No	No
Leominster	No	No	No	No
Lexington	No	No	Yes	No
Lowell	Yes	No	No	No
Lynn	Yes	No	No	Yes
Malden	Police FAQ	No	No	No
Medford	No	Yes	No	No
Melrose	Yes	No	No	No
Milford	Yes	No	No	No
Nantucket	Yes	No	No	No
Natick	Yes	Yes	No	No
Newton	No	Yes	No	Yes
New Bedford	No	No	No	No
Northampton	No	No	No	No
Norwood	No	No	No	No
Oak Bluffs	No	No	No	No
Peabody	Yes	No	No	No
Plymouth	Yes	Yes	No	No
Quincy	Yes	No	No	No
Randolph	Yes	No	No	No
Revere	No	No	No	No
Salem	Yes	Yes	No	No
Shrewsbury	Yes	No	No	No
Somerville	Yes	Yes	Yes	Yes

South Hadley	Yes	Yes	No	No
Springfield	Yes	Yes	No	No
Taunton	No	No	No	No
Tewksbury	Yes	No	No	No
Waltham	Yes	No	No	No
Watertown	Yes	No	No	No
Wellesley	No	No	No	No
Weymouth	Yes	No	No	No
Woburn	No	No	No	No

Meeting Guide 1 Pager

Citizens for Juvenile Justice

Access complete toolkit:

Police/ICE Meeting Guide: How to push my police department to stop working with ICE

Overall Goals

- Build awareness around your towns' immigration policies.
- Get municipal leaders to make policy changes to restrict information sharing with ICE.
- Protect our immigrant neighbors.

Questions to ask

- What education do you provide to officers about the difference between civil detainers and judicial warrants?
- How do you respond when ICE contacts you asking about an individuals information without a judicial warrant?
- Has this department shared any individual's location, custody status, or release date with ICE? Under what circumstances would you do so?
- How are you ensuring that your department is adhering to the Lunn decision?
- What does your department do to help immigrant communities feel safe and welcomed?
- What is the discipline procedure if an officer assists ICE in a manner that violates state, city, or department policies?

Demands / Recommendations

- Do not check an individuals immigration status during police contact or during the arrest process.
- Treat ICE detainer requests as a public records request. Do not share information with ICE, except when is required by law.
- Follow the Lunn decision. Do not hold an individual on a civil immigration detainer.
- Do not assist ICE during immigration raids. Request that ICE notify your police department before a raid. Require your police department to independently verify ICE warrants before raids.
- Do not allow department funds and resources to assist with immigration purposes.
- Do not enter into a 287 (g) agreement.

Creation Date: April 13 2026

When meeting with local leaders, it is important advocate for your cause in an organized and professional matter. Reference this document as a way to stay on topic and ensure that all the points of advocacy are met.

Created by: Citizens for Juvenile Justice (CfJJ) - www.cfjj.org

*This one pager was made while the PROTECT act is moving through state legislature. When the PROTECT act is passed, it may include some of the demands and recommendations mentioned above.

CfJJ Website:

Appendix

Appendix

Civil Immigration Warrant / Administrative Warrant: A document created by ICE authorizing officers to arrest an individual for a civil immigration violation. This document does not go through the court process and is not signed by a judge.

Judicial Immigration Warrant: A criminal warrant signed by a judge authorizing a law enforcement agency to apprehend an individual for criminal immigration violations.

Immigration Detainer: A request from ICE asking that a law enforcement agency (federal, state, or local) notify ICE of an undocumented individual's release date and time in order for ICE to arrest them.

Lunn v. Commonwealth: A landmark case passed in 2017 that banned state and local officials from detaining a person or holding a person in detention beyond their expected release based on a civil immigration detainer. More information about this case can be found at the Boston Bar Association.

8 U.S.C. § 1373: A federal law passed by the Trump administration that attempts to limit sanctuary policies. For more information about this law please refer to the Immigrant Legal Resource Center's pamphlet.

287(g) Agreement: An agreement signed by local law enforcement agencies that deputizes officers to enforce civil immigration functions. *(More information about what 287 (g) agreements entail can be found here).*

Attachment 3 – Lexipol Document; Sebastopol Police Policy Manual

Please find attachment at the link below:

https://www.cityofsebastopol.gov/wp-content/uploads/2026/09/Sebastopol-PD-Policy-Manual-Sept-2026.pdf

REVISED APPROVED PROTOCOLS:

City of Sebastopol Communications Protocol: ICE Activity and/or any other Federal Officials engaged in Immigration Enforcement, Notification and Response

I. Initial Notification Protocol to Police Department (Chief)

A. Upon Receiving a Call or Email from the Department of Homeland Security (DHS), ICE or any other Federal Immigration Officials, City staff must ask the following questions (noting federal immigration officials may choose not to respond):

Is this an ICE operation/Federal Immigration Officials?

If yes, which federal agency is conducting the operation?

What is the nature of the operation? Will arrests or detentions be made?

Do you have a federal judicial warrant signed by a judge?

If yes, send a copy to smcdonagh@cityofsebastopol.gov

Who is the supervising immigration officer or contact for follow-up?

Request name, title, contact information.

B. Internal Notification

Upon receiving any information, the staff person who receives the call or email must immediately notify the Police Chief immediately.

II. Communications with Press and Media

A. Media Inquiries

The Police Chief shall notify the City Manager/Acting City Manager of any press/media inquiries;

The City Manager/Acting City Manager will determine whether the response will come from the Police Chief or the City Manager;

The responder shall coordinate with the City Attorney prior to releasing any statement.

City Council members may speak to the press only as individuals but not on behalf of the city.

III. Notification Protocol (Internal and Council)

A. Upon Credible Report or Confirmation of ICE/Other Federal immigration officials activity,

The Police Chief shall immediately notify the City Manager/Acting City Manager.

Notification must include:

Location, time and nature of activity *(use general area for internal use; do not publicize exact locations),*

Whether ICE or other federal immigration officials requested local support *(permitted only if compliant with City policy and California law),*

Any public safety concerns,

Whether the operation appears related to immigration enforcement.

B. City Manager/Acting City Manager May Brief:

City Council, Affected City Departments, Legal Counsel.

IV. Public Communication Protocol

A. Criteria for Issuance of Public Statement:

If ICE/other federal immigration officials' activity,

May affect public confidence,

Causes fear or disruption,

Poses concern to community operations,

The City Manager/Acting City Manager, in coordination with the Police Chief and City attorney may issue a public statement.

B. Statement Requirements Must Be:
Fact Based
Non-Alarmist
Aligned with City values of inclusion and service to all residents
(e.g., no criminalization of people based on immigration status).
Not include confidential information
A draft statement must be shared with City Council (*one-way communication*) prior to release.

C. ***Sample Public Statement***

The City of Sebastopol has received reports of US Immigration and Customs Enforcement (ICE operating in the greater Sonoma County region.
At this time, there is no indication that ICE is conducting immigration enforcement within the City of Sebastopol. Sebastopol does not assist in civil immigration enforcement except as required by law. Our Police Department does not participate in immigration raids and remains committed to serving all residents, regardless of immigration status.
What We Want You to Know:
** The City in monitoring the situation and will provide updates if necessary.*
** Know Your Rights: https//www.aclu.org/know-your-rights/immigrants-rights*
** City services remain open and accessible to all residents.*
** Sebastopol remains a city committed to inclusion, dignity and safety for everyone.*

Community Support Resources

If you see possible ICE/Federal Immigration Officials or need information of legal service providers, call the North Bay Rapid Response Network Hotline: 707-800-4544.

For legal assistance call: [See appendix A: Sonoma County Legal Service Providers for Immigrants]

V. Role of Local Law Enforcement
A. Sebastopol Police Department (SPD) Personnel:
Shall not participate in civil immigration enforcement;
May only assist ICE in
Response to an immediate and credible threat to public safety,
Joint criminal investigations with judicial authorization.
All assistance must comply with
SB 54 California Values Act,
Other applicable state laws and City policies.

VI. Documentation and Reporting
SPD must document
All contacts or observations involving ICE/other federal immigration officials;
Submit written report of all contacts and enforcement activity must be submitted to City Manager/Acting City Manager within 48 hours of the incident.

VII. -Trainings are required to ensure the broader protection of all residents of Sebastopol.

The Police Chief is responsible for ensuring annual training for SPD personnel on:

SB54 and other applicable laws,
ICE or other federal immigration officials notification and response policy,
Community-informed practices and public communications protocols.

The City shall provide all staff/managers/supervisors in all offices and community facilities regular training

Trainings to include and not limited to:

City Protocols for interactions with ICE/other federal immigration officials
Know Your Rights - KYR
Provide clear delineation of private & public spaces - private access with judicial warrant only;

VIII. Signage (Staff is open to signage but will need to review costs)

Post welcoming signs (in languages that reflect the community) in offices and community spaces according to Resolution 6127 Safeguarding the Civil Rights, Safety and Dignity of all residents that state:

All residents regardless of immigration status are welcome;
City police do not participate in raids or assist in civil immigration enforcement except as required by law.

Prepare for potential activity by ICE/other federal immigration officials by designating and marking private and public areas clearly.

Display Know Your Rights (KYR) posters and cards in offices and city facilities.

Sonoma County Legal Services Providers for Immigrants

IMMIGRATION LEGAL SERVICES

due to overwhelming demand, all immigration legal services providers currently have a waitlist and require an appointment

Vital Immigrant Defense Advocacy & Services (VIDAS)

Types of Services: Removal Defense, Asylum, Special Immigrant Juvenile Status (SIJS), U & T Visas, VAWA, Family Based Petitions, Waivers, Work Authorization, Consular Processing, Deferred Action for Childhood Arrivals (DACA) Renewal, Deferred Action for Labor Enforcement (DALE), Adjustment of Status, Naturalization/Citizenship

Phone: Santa Rosa: (707) 523-1740,
SRJC Dream Center: (707) 838-8383,
Petaluma: (707) 347-9115

Website: https://vidaslegal.org

Immigration Institute of the Bay Area (IIBA)

Types of Services: Special Immigrant Juvenile Status (SIJS), Deferred Action for Childhood Arrivals (DACA) renewal, U & T Visas, VAWA, Family Based Petitions, Waivers, Work Authorization, Consular Processing, Adjustment of Status, Naturalization/Citizenship

Phone: (707) 932-7000

Website: https://iibayarea.org

Sonoma Immigrant Services (SIS)

Types of Services: Special Immigrant Juvenile Status (SIJS), U & T Visas, VAWA, Family Based Petitions, Waivers, Work Authorization, Consular Processing, Deferred Action for Childhood Arrivals (DACA) Renewal, Adjustment of Status, Naturalization/Citizenship

Phone: (707) 996-6669

Website: https://www.sonomaimmigrant.org/

University of San Francisco, School of Law, Immigration & Deportation Defense Clinic

Types of Services: Removal Defense, Asylum, Special Immigrant Juvenile Status (SIJS), U & T Visas, Appeals

Phone: (415) 422-6171

Website: https://www.usfca.edu/law/engaged-learning/law-clinics

Catholic Charities of Northwest California, Immigration Legal Services

Types of Services: Deferred Action for Childhood Arrivals (DACA) Renewal, U & T Visas, VAWA, Green Card Renewals, Adjustment of Status, Consular Processing, Work Authorization, Naturalization/Citizenship

Phone: (707) 578-6000

Website: https://ccnwc.org

California Human Development (CHD)

Types of Services: Green Card renewals, Deferred Action for Childhood Arrivals (DACA) Renewals, Family Based Petitions, Work Authorization, Consular Processing, Adjustment of Status, Naturalization/Citizenship

Phone: (707) 523-1155 ext. 4721

Website: https://californiahumandevelopment.org

Sonoma County Public Defender's Office

Types of Services: Post Conviction Relief

Phone: (707) 565-2791

Website: https://sonomacounty.ca.gov/justice-services/public-defender/post-conviction-relief

OTHER CIVIL LEGAL SERVICES

Legal Aid of Sonoma County

walk-ins accepted Mon – Thu

Types of Services: All other civil legal issues, including Guardianship, Housing Rights, Eviction Defense, Restraining Orders, Veteran Benefits

Phone: (707) 542-1290

Website: https://legalaidsc.org