Cooperation Between U.S. Immigration and Customs Enforcement and State and Local Law Enforcement Agencies

Center For
POLICING EQUITY

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OVERVIEW

For community advocates, policymakers, and law enforcement agencies (LEAs) interested in exploring alternatives, this document outlines how federal immigration authorities can—and cannot—compel state and local LEAs to cooperate. It also proposes four strategies that state and local jurisdictions can adopt to resist the growing push for a uniform law enforcement system under executive authority. Specifically, jurisdictions can 1) name the actions currently underway; 2) claim their moral vision through proactive legislation; 3) restrain the use of local funding for immigration enforcement; and 4) reframe these initiatives as measures that strengthen public safety. Community members and elected leaders are encouraged to share this document as a pathway toward a more just and equitable future.

INTRODUCTION

When a state or local law enforcement agency (LEA) arrests and books someone, the National Crime Information Center (NCIC) database may alert that the individual is being sought by U.S. Immigration and Customs Enforcement (ICE) — this is where the two distinct systems of law collide. The federal system of immigration law derives from Congress's plenary Article I powers and the executive branch's authority to enforce immigration laws. The state-managed criminal legal system, however, is grounded in the police powers not possessed by the federal government.

Immigration enforcement can lead to serious consequences, including the separation of families and the reluctance of domestic violence survivors to call 911. Even a seemingly minor traffic violation, such as a broken taillight, can place individuals in the path of federal immigration detention. This intersection between federal and state legal systems shapes whether community members feel safe reporting crimes, whether racial disparities and collateral consequences — such as job or housing loss, family separation, loss of government benefits, or exposure to immigration detention — intensify, and whether due-process rights are protected.

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Immigration policy did not used to be like this. Historically, it was less punitive, did not terrorize communities, and did not permeate every level of public safety systems, undermining public trust and effectiveness. Because immigration enforcement has not always operated this way, there is reason to believe it does not need to remain this way.

THE SPECTRUM OF COOPERATION

Cooperation between ICE and LEAs in the context of immigration exists on a spectrum between legal compulsion and voluntary discretion. Judicial warrants, such as criminal arrest warrants or search warrants, fall at the compulsion end because they are issued by Article III judges following a finding of probable cause. Unlike ICE's administrative warrants, which are issued directly by the agency, judicial warrants carry the full force of the judiciary and impose an unquestioned obligation on LEAs to comply (18 U.S.C. § 401, n.d.). For example, if an ICE agent presents a judicial warrant at a county jail to take custody of an individual held on state charges for a misdemeanor offense, the LEA must comply with the judicial warrant or risk obstruction charges and civil liability (18 U.S.C. § 401, n.d.).

Unlike ICE's administrative warrants, which are issued directly by the agency, judicial warrants carry the full force of the judiciary and impose an unquestioned obligation on LEAs to comply.

An NCIC alert presents a more ambiguous directive for LEAs. Although no local law explicitly requires LEAs to enter booking fingerprints into the NCIC database, failure to do so would prevent them from conducting routine warrant checks. In practice, the system functions as de facto mandatory because opting out would significantly hinder basic policing operations and compromise officer safety.

Voluntary undertakings between ICE and LEAs include detainers and ICE administrative warrants. Unlike judicial warrants, detainers and ICE administrative warrants are requests rather than compulsory orders. For example, in *Miranda-Olivares v. Clackamas County*, a federal court held that jails violate the Fourth Amendment when detaining an individual solely on the basis of an ICE detainer lacking independent probable cause (*Miranda-Olivares v. Clackamas County*, 2014). Similarly, in *Galarza v. Szalczyk*, the U.S. Court of Appeals for the Third Circuit determined that ICE detainers are requests, not mandates, and therefore cannot compel state or local LEAs to detain suspected undocumented individuals (*Galarza v. Szalczyk*, 2014). Such rulings, along with a series of settlements between LEAs and individuals whose rights were violated, have led dozens

of jurisdictions to require judicial warrants before extending detention pursuant to an ICE detainer (Law Enforcement Immigration Task Force, 2017).

The vast majority of cooperative undertakings between ICE and LEAs are voluntary; however, this voluntariness is often illusory. In the absence of clear local policy, LEAs may face intense political pressure, threats of losing federal grant funding, and direct pressure from ICE, making noncooperation appear risky or untenable. ICE's 287(g) program, which allows ICE to deputize local officers to perform certain federal immigration functions, illustrates both the scope of voluntary participation and the role of local discretion (U.S. Immigration and Customs Enforcement, 2025). As of July 2025, ICE has signed 811 Memoranda of Agreement under the 287(g) program with LEAs covering 40 states (U.S. Immigration and Customs Enforcement, 2025). Participation in the program can be categorized into three types: 116 Jail Enforcement Model (JEM) agreements, which permit deputized officers at local jails to identify and process individuals for federal immigration proceedings while in local custody; 294 Warrant Service Officer (WSO) agreements, which authorize deputized officers to serve and execute ICE administrative warrants on individuals in the agency's custody; and 401 Task Force Model (TFM) agreements, which grant deputized officers immigration enforcement authority during routine policing duties, such as traffic stops or criminal investigations, and as active participants in ICE-led joint task forces.[1]

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Termination of a 287(g) program agreement is an option for any LEA, typically at any time with written notice (Kolker, 2021). Several LEAs have ended their 287(g) agreements with ICE due to community opposition. For example, Contra Costa County, California terminated its cooperation agreement with ICE in 2018 following persistent protest vigils outside the county jail (Contra Costa County Sheriff's Office, 2018). In the same year, Mecklenburg County, North Carolina, terminated its cooperation agreement with ICE after the community elected a sheriff who made termination of the program a central campaign issue (ACLU of North Carolina, 2018). Additionally, Harris County, Texas, terminated its agreement with ICE in 2017, in part due to advocacy efforts by organizations such as the ACLU of Texas, United We Dream, the Immigrant Legal Resource Center, and the Texas Organizing Project (ACLU, 2017).

Voluntary and discretionary cooperative undertakings between ICE and LEAs often operate outside of public view, creating conditions in which due process protections may erode and oversight bodies remain unaware. Such practices include joint task forces with Homeland Security investigations, intelligence sharing through fusion centers, the provision of state Department of Motor Vehicles (DMV) or LEA gang database records to ICE, and informal phone calls from LEA officers notifying ICE of release dates. Because affected individuals are typically unaware that their information has been shared, they rarely have the opportunity to contest these actions, and oversight boards cannot audit processes that remain hidden. Although none of these practices are legally mandated, they persist due to habit, professional incentives, or political alignment. Furthermore, some officers and local officials may underestimate the extent to which seemingly routine data transfers can result in prolonged immigration detention for the individuals involved.

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FEDERAL LEVERS OF COERCION

Federal officials are required to respect the 10th Amendment's anti-commandeering principle, which prohibits the federal government from compelling local jurisdictions to enforce federal programs, including immigration (*Printz v. United States*, 1997). Nevertheless, the significant imbalance of power and resources between local jurisdictions and the federal government enables federal officials to exercise substantial leverage over local decision-making. Resource-constrained LEAs and jurisdictions are aware that resistance may risk the loss of critical grant funds, exposure to political criticism for being perceived as lenient on crime, or costly litigation. Recently, both the federal executive branch and Congress have introduced new forms of pressure designed to restrict the voluntary and discretionary space available to LEAs while avoiding violations of the 10th Amendment's anti-commandeering doctrine.

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Beginning with the executive branch, on April 28, 2025, the president signed the executive order *Protecting American Communities from Criminal Aliens*, which directed the Department of Homeland Security (DHS) to publish a list of local jurisdictions unwilling to honor federal immigration requests (*Protecting American Communities from Criminal Aliens*, 2025). A month later, DHS issued its first list of non-cooperative jurisdictions, warning them of potential statutory violations and funding consequences (U.S. Department of Homeland Security, 2025).

Congress's contribution to constricting the voluntary and discretionary authority of LEAs is the *Laken Riley Act*, enacted January 29, 2025 (*Laken Riley Act*, 2025). This statute mandates no-bond detention for any undocumented individual accused of certain theft-related offenses, assaulting a law enforcement officer, or crimes resulting in death or serious bodily injury (*Laken Riley Act*, 2025). Additionally, the statute allows states to sue the federal government for perceived "underenforcement" of immigration laws (*Laken Riley Act*, 2025). Most notably, the mandatory detention provisions in this statute effectively requires local jails to hold undocumented individuals accused of certain offenses immediately upon the issuance of an immigration detainer by a federal agency, such as DHS (*Laken Riley Act*, 2025). Because individuals subject to a federal detainer are often held even when a jail must release others due to overcrowding, this could result in the release of someone accused of serious violent offenses while continuing to detain a person whose only alleged conduct is a civil immigration violation, such as overstaying a visa (Ruby, 2025). More often, jail capacity limitations push jurisdictions to prioritize civil immigration holds over the prosecution or detention of more serious local offenses (Leonard & Sewell, 2013).

Returning to the federal executive branch's efforts to constrain the discretion of LEAs, an innovative tactic known as *Operation Guardian Angel* is aimed at countering sanctuary state and city policies (U.S. Department of Justice, 2025). The U.S. Attorney's Office for the Central District of California launched Operation Guardian Angel in May 2025 (U.S. Attorney's Office, Central District of California, 2025). In this office, federal prosecutors now pursue illegal re-entry indictments and obtain judicial warrants before undocumented individuals held in local jails or county prisons complete their sentences (U.S. Attorney's Office, Central District of California, 2025). This approach essentially compels LEAs to transfer these individuals over to federal authorities, despite the existence of local sanctuary policies. By converting a non-mandatory immigration detainer into a compulsory judicial warrant, Operation Guardian Angel circumvents local jurisdictions' non-cooperation immigration policies while technically remaining consistent with the 10th Amendment's anti-commandeering doctrine.

Traditional levers of coercion remain in effect as well. On several occasions, the Department of Justice (DOJ) has attempted to make Byrne Justice Assistance Grants (JAG) — the primary federal funding source for state and local jurisdictions — contingent upon cooperation with federal immigration enforcement (Odell, 2021). The Seventh, Third, and Ninth Circuit Courts of Appeals have blocked such efforts, holding that the DOJ lacks statutory authority to impose these conditions (Odell, 2021). However, the Second Circuit Court of Appeals held that the DOJ is statutorily authorized to impose such grant conditions (State of New York v. U.S. Dep't of Justice, 2020). Nevertheless, executive branch fiscal coercion, along with the mere threat of losing federal funds, can deter local resistance to federal immigration enforcement efforts.

CONSTITUTIONAL GUARDRAILS

The Supreme Court's recent anti-commandeering decisions prohibit Congress from issuing direct orders to State governments in violation of the 10th Amendment. Most recently, in the 2018 Supreme Court case *Murphy v. NCAA*, the Court struck down a federal law that prohibited states from repealing sports gambling prohibitions, reaffirming that the federal government cannot compel states to enact or implement federal programs (Murphy v. National Collegiate Athletic Association, 2018). Applying this principle to immigration, the anti-commandeering doctrine bars Congress from requiring LEAs to universally honor immigration detainers, enter into 287(g) agreements, or participate in task forces, and it similarly prohibits the executive branch from imposing such requirements through unilateral orders.

Even in instances where cooperation is nominally voluntary, constitutional limits can create liability risks for LEAs that choose to cooperate without a legal obligation. The Fourth Amendment requires probable cause for any seizure. Accordingly, detaining an individual past their scheduled release date based solely on an ICE detainer can expose LEAs to civil liability and potential damages (*Miranda-Olivares v. Clackamas County, 2014*). The Spending Clause imposes similar limitations, requiring that conditions on grants be clearly stated, enacted by Congress, and reasonably related to the purpose of the funding (*City of Chicago v. Barr, 2020*). When LEAs comply with vague immigration-related grant conditions solely to maintain federal funding, they risk claw-backs, audit findings, and litigation costs if the grant conditions are later determined to be invalid.

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States have also implemented their own safeguards. For example, Illinois's TRUST Act generally prohibits LEAs from complying with immigration detainers without a judicial warrant and restricts cooperation in arrests of undocumented immigrants absent a court order (Illinois Attorney General, 2025). To date, this legislation has withstood a renewed wave of political opposition in 2025, despite a federal lawsuit challenging it as an obstruction to immigration enforcement (Tareen, 2025). Similarly, California, Colorado, and Washington maintain parallel sanctuary policies, establishing state-level safeguards even in the face of ongoing federal pressure (California State Legislature, 2017).

EMERGING TRENDS

Four trends characterize the current immigration landscape, the first of which is the expansion of sanctuary policies. By 2025, 17 states and more than 300 jurisdictions have enacted laws limiting jail holds, restricting data sharing, or establishing warrant requirements for the transfer of individuals (Federation for American Immigration Reform, 2025). Second, federal "name-and-shame" efforts targeting uncooperative local jurisdictions have intensified. As noted previously, DHS now officially publishes a list of non-cooperative jurisdictions, warning them of potential statutory violations and funding consequences (U.S. Department of Homeland Security [DHS], 2025). Third, courthouse arrests and public-place sweeps have replaced jail pickups as ICE adapts to local LEAs resistance to immigration detainers. Finally, workarounds in data sharing have increased, with ICE acquiring access to commercial databases such as CLEAR and contracting social media scraping companies to support its immigration enforcement efforts (Sellers, 2025).

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These tactics disproportionately harm low-income and immigrant communities, who are more likely to appear in public benefits records, gang databases, or vehicle registration databases. Such measures not only circumvent traditional avenues of data sharing but also make it difficult for organizations to monitor cooperation efforts between LEAs and ICE, potentially increasing errors and collateral consequences for the community. These trends suggest that the future of cooperation between ICE and LEAs will depend on innovative federal tactics and on how effectively local jurisdictions can anticipate and respond to them.

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RECOMMENDATIONS

Because mandatory cooperation between ICE and LEAs is limited, communities retain considerable latitude to align local policing policies with local values. The recommendations offered below are intended to translate the need for proactive, evidence-based goals into actionable policies that reflect community values.

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1) Name It

First, local communities should conduct audits of ICE and LEA cooperation. City councils or public safety committees can commission these audits, while civilian oversight bodies or inspectors general carry out the reviews. Community coalitions, including immigrant rights groups, legal aid organizations, and public defender offices should be formal participants. The audits might include public records requests to uncover detainer records, 287(g) agreements, cost reimbursement records, database access agreements, and internal communications. Additionally, comparing ICE transfer rates with local jail bookings could reveal potential discrepancies, indicating informal notification patterns between LEAs and ICE.

2) Claim It

Second, state and local immigration policies should be reformed. State legislatures can terminate 287(g) programs, mandate judicial warrants for transfers to federal immigration custody, prohibit the use of local funds for prolonged immigration holds, restrict ICE access to sensitive databases except when a judge determines a specific need, and establish a private right of action for illegal holds. Additionally, state legislatures could require that defense counsel be notified prior to an ICE interview in custody.

At the county or municipal level, local governments can enact non-entanglement ordinances, require the logging and quarterly reporting of all ICE requests, and prohibit the sharing of sensitive information with ICE unless legally mandated. At the agency level, LEA policies can prohibit compliance with ICE detainers absent a judicial warrant and require command-level review and approval for any ICE request. Furthermore, LEA policies can bar courthouse immigration enforcement assistance and pretext stops for civil immigration purposes and mandate annual public reporting of all ICE requests.

3) Restrain It

Third, fiscal firewalls should be established to ensure that funds designated for public safety are not used for immigration enforcement. Congress should prohibit the inclusion of immigration enforcement conditions in non-immigration grant programs and require public disclosure of any immigration enforcement-related expenditures to promote transparency and accountability. Local governments should prohibit the use of city or county resources for federal immigration enforcement, including city or county personnel, facilities, equipment, and IT infrastructure. Additionally, local governments should maintain separate budgets specifically appropriated for local public safety to prevent the repurposing of funds for federal immigration enforcement.

4) Reframe It

Finally, adopt an evidence-based narrative for community members, local officials, and law enforcement leadership that reframes "sanctuary" as responsible local control, preserving agency and due process while enhancing public safety outcomes. Some studies fail to find a correlation between LEA detainer compliance and reduced violent crimes rates, however, other research indicates that cooperation between ICE and LEAs can suppress crime reporting, particularly among vulnerable immigrant communities (Baumer & Xie, 2023). Accordingly, localities should incorporate local data into the evidence-based narrative, including violent crime rates and detention costs, to demonstrate that higher ICE detainer rates do not necessarily correspond with lower violent crime rates or reduced expenditures. By emphasizing empirical data and public safety outcomes, this approach can counter prevailing rhetoric that characterizes sanctuary jurisdictions as lawless and can ground policy in community-driven safety goals.

CONCLUSION

Cooperation between ICE and LEAs exists along a spectrum. At one end are judicial warrants, which all LEAs are required to honor. At the other end are discretionary actions, including 287(g) agreements, compliance with immigration detainers and ICE administrative warrants, data sharing, and informal communications between LEAs and ICE. Federal actors are increasingly seeking to limit the discretionary authority available to local jurisdictions. Constitutional protections, along with state and local sanctuary statutes, continue to provide room for local control. Local jurisdictions that carefully define their LEA and ICE cooperation practices, invoke anti-commandeering standards, and implement transparent, evidence-based protections are better positioned to ensure that public safety policies are not undermined by federal immigration enforcement. Thus, the ultimate question is whether local jurisdictions and LEAs will exercise their discretion to foster trust and equity within the community while ensuring due process, or whether they will allow external immigration agendas to dictate whom their officers detain, arrest, and transfer into federal custody.

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Be a Champion for Community Safety

The time for change is now. Engage with our recommendations, share the paper with your network, and demand policies that put community safety first.

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