

# EXHIBIT 1

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10 **IN THE UNITED STATES DISTRICT COURT FOR THE**  
11 **CENTRAL DISTRICT OF CALIFORNIA**  
12 **WESTERN DIVISION**

13 THE UNITED STATES OF AMERICA,  
14 *Plaintiff,*

15 v.

16 STATE OF CALIFORNIA; GAVIN  
17 NEWSOM, Governor of California, in  
18 his Official Capacity; ROBERT  
19 BONTA, Attorney General of California,  
20 in his Official Capacity,

21 *Defendants.*

Case No. 2:25-cv-10999

**[PROPOSED] BRIEF OF *AMICI***  
***CURIAE* LOCAL**  
**GOVERNMENTS AND LOCAL**  
**GOVERNMENT LEADERS IN**  
**SUPPORT OF DEFENDANTS'**  
**OPPOSITION TO MOTION FOR**  
**PRELIMINARY INJUNCTION**

Date: January 12, 2026

Time: 10:00 a.m.

Before: Hon. Christina A. Snyder

**TABLE OF CONTENTS**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

STATEMENT OF INTEREST..... 1

ARGUMENT.....2

I. *AMICI'S* COMMUNITIES HAVE LONG RECOGNIZED THAT IDENTIFIABLE LAW ENFORCEMENT IS ESSENTIAL TO PUBLIC SAFETY .....3

II. ANONYMOUS FEDERAL LAW ENFORCEMENT DRIVES FEAR AND CONFUSION, UNDERMINES PUBLIC SAFETY, AND IMPOSES CONCRETE HARMS ON *AMICI'S* JURISDICTIONS .....7

    A. Masked, Unbadged Federal Agents Who Purposefully Obscure Their Identities While on Duty Have Generated Widespread Confusion and Fear.....7

    B. Masked and Unidentifiable Policing Undermines Public Safety and Enables Criminal Impersonation. .... 10

    C. These Practices Have Imposed Concrete, Measurable Harms on Amici Jurisdictions and Their Residents. .... 14

III. SERIOUS CONSTITUTIONAL VIOLATIONS HAVE OCCURRED IN *AMICI'S* COMMUNITIES AND ANONYMITY CURTAILS RESIDENTS' ABILITY TO SEEK ANY REDRESS ..... 19

CONCLUSION.....22

ADDITIONAL COUNSEL .....24

Appendix A - List of Amici Curiae .....26

1 **TABLE OF AUTHORITIES**

2  
3 **CASES**

4 *Bernhardt v. Los Angeles County,*  
5 339 F.3d 920, (9th Cir. 2003) .....2  
6  
7 *Sammartano v. First Jud. District Court,*  
8 303 F.3d 959, (9th Cir. 2002) .....2

9 **CALIFORNIA STATUTES**

10 Sen. Bill 264, 2025-2026 Reg. Sess. (Cal. 2025) ..... 14  
11 Sen. Bill 627, 2025-2026 Reg. Sess., ch. 125, 2025 Cal Stat..... 1  
12 Sen. Bill 805, 2025-2026 Reg. Sess., ch. 126, 2025 Cal. Stat. .... 1

13  
14 **LEGISLATIVE MATERIALS**

15  
16 *Hearing on S.B. 627 Before the Senate Standing Committee on*  
17 *Public Safety, 2025-2026 Reg. Sess. (Cal. 2025)..... 16*  
18  
19 *Hearing on S.B. 805 Before the Senate Standing Committee on*  
20 *Public Safety, 2025-2026 Reg. Sess. (Cal. 2025).....20*  
21  
22 U.S. Senate, Permanent Subcommittee on Investigations,  
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24 *Administration’s Extrajudicial Immigration Detentions* (Dec.  
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26 **OTHER AUTHORITIES**

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28 *harassing shoppers in Fresno, ABC 30* (Feb. 27, 2025)..... 12  
  
ABC News, *LA school enrollment drops amid ICE raids*  
(YouTube, Nov. 30, 2025)..... 19

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2 *But instead found an ICE operation*, ABC News (June 25,  
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4 Allie Preston, *Masked and Unidentifiable: The Risks of Federal*  
5 *Law Enforcement Operating Without Identification*, Ctr. for  
6 Am. Progress (Aug. 28, 2025)..... 11  
7 Amy Larson, *Driver with fake federal agent badges arrested in*  
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9 Andrew Lopez, *ICE raids push Boyle Heights restaurants to the*  
10 *brink: ‘I don’t know how much longer we can do this’* Boyle  
11 Heights Beat (Aug. 7, 2025)..... 18  
12 Angelique Brenes, *ICE agents detain mother in Pasadena in*  
13 *front of children without showing a warrant*, KTLA (June 28,  
14 2025)..... 15  
15 Anita Chabria, *Homeland Security says it doesn’t detain citizens.*  
16 *These brave Californians prove it has* (Dec. 12, 2025)..... 20  
17 Anthony Victoria, *Riverside adopts resolution requiring federal*  
18 *agents to show ID and condemning mask use*, KVCR (Oct.  
19 15, 2025)..... 6  
20 Ayah Ali-Ahmad, *Alameda County approves \$3.6 million to*  
21 *scale up immigrant defense amid ICE surge*, Oaklandside  
22 (Oct. 15, 2025)..... 17  
23 Bay Area Council Econ. Inst. & Univ. of Cal., Merced, *The*  
24 *Economic Impact of Mass Deportation in California* (June  
25 2025)..... 18  
26 Bay City News Service, *Regional: Local Cities, Counties*  
27 *Launch Regional Fund For Families Impacted By Ice Raids*,  
28 SF Gate (Sept. 19, 2025) ..... 8, 17

1 *Best Practices for Law Enforcement to Preserve Community*  
2 *Trust in the Context of Increased Immigration Enforcement,*  
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5 *from wearing masks, confirms use of Medicaid data, CBS*  
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7 *Claudia Boyd-Barrett, California Faces Limits as It Directs*  
8 *Health Facilities To Push Back on Immigration Raids, Kaiser*  
9 *Fam. Found. Health News (Oct. 30, 2025).....*19  
10 *County of Santa Clara Allocates Additional Funding for Rapid*  
11 *Response as Immigration Enforcement Activity Escalates in*  
12 *California, Cnty. of Santa Clara (June 20, 2025).....*17  
13 *Dani Anguiano, California police intervene as ICE agent in plain*  
14 *clothes points gun at woman, The Guardian (Nov. 11, 2025).....*10  
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16 *ICE Opens Door to Vigilante Impersonators, Truthout (July*  
17 *19, 2025).....*4  
18 *Dell Cameron & Caroline Haskins, FBI Warns of Criminals*  
19 *Posing as ICE, Urges Agents to ID Themselves, Wired (Nov.*  
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21 *Department Notice: Response to Incidents Involving Federal*  
22 *Civil Immigration Enforcement, San Francisco Police Dep't*  
23 *(Aug. 26, 2025).....*16  
24 *Enrique Chiabra, Healthcare Clinic Reports Appointment*  
25 *Cancellations and No-Shows Amid Fear of ICE Raids, Ctr.*  
26 *for Health Journalism (July 19, 2025).....*19  
27 *Face Coverings and Police-Community Engagement, Int'l Ass'n*  
28 *of Chiefs of Police (Nov. 3, 2020).....*4

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3	2025).....	20
4	Helen Jeong, <i>Growing calls for police to show ID and face amid</i>	
5	<i>rise in ICE impersonators</i> , NBC Los Angeles (June 23, 2025)	
6	.....	8
7	Iris Kwok & Howard Blume, <i>High school bullying is up,</i>	
8	<i>attendance down as ICE raids sow ‘climate of distress,’ study</i>	
9	<i>says</i> , LA Times (Dec. 9, 2025).....	18
10	J. David McSwane and Hanna Allam, <i>Unfettered and</i>	
11	<i>Unaccountable: How Trump Is Building a Violent, Shadowy</i>	
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13	Jacob Sisneros, <i>Amid string of raids, immigration agents chase</i>	
14	<i>gardener, tackle him in front of LBPD officers, witnesses say,</i>	
15	Long Beach Post News (Nov. 21, 2025) .....	9, 10, 11
16	Jared Bennett, <i>LAPD chief instructs officers to verify identity of</i>	
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23	Jose Olivares & Lisa Dsjardins, <i>Rise of ICE agents wearing</i>	
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25	PBS News Hour (July 7, 2025) .....	13
26	Joseph Geha, <i>San José Aims to Thwart ICE With New Policies</i>	
27	<i>on Masks and Public Properties</i> , KQED (Nov. 3, 2025) .....	6
28	Josh Campbell, <i>As ICE escalates its tactics, are federal agents</i>	
	<i>truly ‘untouchable’ in the eyes of the law?</i> CNN (Nov. 15,	
	2025).....	19

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2 *tighten immigrant protection*, Local News Matters (Oct. 30,  
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5 (Nov. 17, 2025)..... 18  
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7 *take effect in 30 days, setting up showdown with feds*, LAist  
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10 *since federal immigration action began*, Boyle Heights Beat  
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13 *detained and held their teenage son at gunpoint*, CBS News  
14 (Nov. 18, 2025)..... 15  
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16 *Field*, Cmty. Oriented Policing Servs., U.S. Dep’t of Just.  
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20 2025)..... 16  
21 Maaz Alin, *LA County Supervisors Vote to Ban Masked Law*  
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23 2025).....6  
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26 ABC News (Dec. 26, 2020)..... 12  
27 Melissa Gomez, *He was ‘trying to stay alive.’ Family*  
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LA Times (July 22, 2025).....21

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4 Nathan Solis & Richard Winton, ‘*Who are these people?*’  
5 *Masked immigration agents challenge local police, sow fear*  
6 *in L.A.*, LA Times (June 24, 2025) .....8, 12, 13  
7 Nic Garcia & KJ Hiramoto, *ICE Agent Shoots at Car in*  
8 *California Standoff: Driver, CPB Agents Share Conflicting*  
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12 *crackdown*, CNN (June 21, 2025) .....4  
13 Robert Handa, *San Jose passes ordinance requiring ICE agents*  
14 *to be masked*, NBC Bay Area (Oct. 29, 2025) .....6  
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16 *is already getting hit by immigration raids*, LA Times (July  
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18 Univ. of Cal., Merced, Cmty. and Lab. Ctr., *The Effects of Recent*  
19 *Federal Immigration Enforcement on Private Sector*  
20 *Employment in California and Washington, D.C.* (Nov. 2025)  
21 ..... 17, 18  
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23 *Excerpt* (YouTube, July 30, 2025) ..... 10  
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26 Aug. 11, 2025) .....22  
27  
28

1 **STATEMENT OF INTEREST**

2 *Amici* are local governments and local government leaders from across the  
3 state of California.<sup>1</sup> *Amici* write in support of Defendants’ Opposition to the  
4 Plaintiff’s Motion for Preliminary Injunction to enjoin two California statutes  
5 passed in response to frequent and destructive immigration enforcement tactics  
6 occurring in our jurisdictions. Since early 2025, federal agents have targeted  
7 California communities with increasingly aggressive tactics—often while wearing  
8 masks and balaclavas and without any clear identification or badges—as they  
9 conduct enforcement raids.  
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13 The challenged No Vigilantes Act, Sen. Bill 805, 2025-2026 Reg. Sess., ch.  
14 126, 2025 Cal. Stat., and the No Secret Police Act, Sen. Bill 627, 2025-2026 Reg.  
15 Sess., ch. 125, 2025 Cal Stat., simply prevent law enforcement officers at both the  
16 local and federal level from obscuring their identities while on duty. These laws  
17 codify longstanding and common-sense practices already utilized by many local  
18 police departments and, *until this past year*, federal agents. Even assuming each  
19 federal agent is performing lawful duties within the contours of their job duties, it  
20 is of no controversy for *amici* to ask that immigration enforcement occurs within  
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27 <sup>1</sup> No party or party’s counsel authored this brief in whole or in part and no party or party’s counsel  
28 contributed money intended to fund preparation or submission of this brief. A list of all *amici* is  
provided at Appendix A. All parties have consented to the filing of this brief.

1 our jurisdictions by agents who do not hide their faces, names, badge numbers, and  
2 agency.

3  
4 *Amici* cities and local government leaders understand that the challenged  
5 Acts are necessary for public safety and are in response to the unprecedented,  
6 violent, indiscriminate, and sometimes unlawful federal immigration enforcement  
7 activities occurring throughout the State. *Amici* share a common interest and  
8 responsibility in protecting the general welfare of all of our residents and creating  
9 safer communities. Anonymity in law enforcement decreases public safety, reduces  
10 public trust in government, and does nothing to serve the public interest. Some  
11 *amici* have also borne witness to the events described in this brief and are uniquely  
12 able to provide the Court with a window into the public interest based on their  
13 perspectives. *Amici*, accordingly, have strong interests in the constitutionality of  
14 the challenged Acts.

## 18 **ARGUMENT**

19  
20 *Amici* seek to protect their community members and their own interests by  
21 supporting Defendants' opposition to the Government's request for an injunction  
22 of the challenged Acts. In deciding whether to grant an injunction, the Court  
23 examines the impact of an injunction on the public interest, which "primarily  
24 addresses impact on non-parties rather than parties." *Bernhardt v. Los Angeles*  
25 *Cnty.*, 339 F.3d 920, 931 (9th Cir. 2003) (quoting *Sammartano v. First Jud. Dist.*  
26 *Ct.*, 303 F.3d 959, 974 (9th Cir. 2002)). Here, allowing the federal government to

1 proceed unabated with its enforcement tactics would inflict concrete harms on  
2 *amici*'s communities by permitting federal immigration enforcement to continue  
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4 under conditions of anonymity, unaccountability, and escalating violence.

5 The federal government's recent practice of deploying masked,  
6 unidentifiable, and heavily armed agents into California communities is  
7  
8 unprecedented. *Amici* underscore how this anonymity has engendered confusion  
9 and fear, diminished public safety by increasing dangerous and violent encounters  
10 and by inviting distrust of law enforcement and criminal impersonation, and  
11 created concrete costs and harms on local jurisdictions. In addition, *amici* highlight  
12 stories of U.S. citizens and non-citizens in the State who have been assaulted,  
13 punched, thrown to the ground, injured, shackled, and held against their will—not  
14 only without process, but also without knowing the identity of the offending officer  
15 or agency. As a result, residents have limited ability to seek redress when their  
16 rights are violated. For the reasons provided below, and those offered by  
17 Defendants, the Government's request should be denied.  
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21 **I. AMICI'S COMMUNITIES HAVE LONG RECOGNIZED THAT**  
22 **IDENTIFIABLE LAW ENFORCEMENT IS ESSENTIAL TO**  
23 **PUBLIC SAFETY**

24 Public safety in *amici*'s jurisdictions depends on trust between residents and  
25 local law enforcement. That trust is built through transparency, accountability, and  
26 human interaction—principles long reflected in best practices requiring officers to  
27 wear uniforms, badges, and visible faces and clear identification while on duty,  
28

1 with limited exceptions.<sup>2</sup> Without trust in law enforcement, community members  
2 tend to underreport crimes, avoid assisting with investigations, and do not seek  
3 assistance when needed.<sup>3</sup> When officers conceal their identities and operate  
4 anonymously, trust erodes, cooperation declines, and public safety suffers.<sup>4</sup>

6 In fact, until this past year, these longstanding principles were shared and  
7 practiced by federal enforcement agencies and *amici* alike.<sup>5</sup> City streets, suburban  
8 and country roads, places of work and worship, courthouses, community centers,  
9 shopping malls, and schools should be free of ambushes by faceless, “unidentified  
10 men and women wearing neck gaiters, mismatched camouflage attire,”<sup>6</sup> or in  
11 plainclothes, heavily armed, and driving unmarked vehicles seems like common  
12 sense. Yet, communities across California—no matter their size, demographics, or  
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17 <sup>2</sup> See, e.g., *Law Enforcement Best Practices: Lessons Learned from the Field*, Cmty. Oriented  
Policing Servs., U.S. Dep’t of Just. at 6, 10-15 (2019), <https://perma.cc/3VVB-WTFB>.

18 <sup>3</sup> *Best Practices for Law Enforcement to Preserve Community Trust in the Context of Increased*  
19 *Immigration Enforcement*, Law Enf’t Immigr. Task Force (Dec. 23, 2024),  
20 <https://perma.cc/BRR7-MH3P> (“Just as distrust undermines law enforcement’s relationship with  
immigrant communities, this fear can deter entire immigrant communities from seeking help and  
reporting crimes.”).

21 <sup>4</sup> See *Face Coverings and Police-Community Engagement*, Int’l Ass’n of Chiefs of Police, (Nov.  
22 3, 2020), <https://perma.cc/V8MC-DHKW> (advising police officers that members of the public  
23 “may be intimidated or fearful of officers wearing a face covering, which may heighten their  
defensive reactions,” and advising police officers interacting with members of the public during  
COVID-19 to remove their face masks when introducing themselves, to maintain public trust).

24 <sup>5</sup> See, e.g., *Law Enforcement Best Practices*, *supra* note 2; see also Ray Sanchez & Alisha  
25 Ebrahimji, *Masked ICE officers: The new calling card of the Trump administration’s*  
26 *immigration crackdown*, CNN (June 21, 2025), <https://perma.cc/QF86-2U4R> (former acting  
27 director of ICE, John Sandweg, recalling that he had never seen anyone wearing masks during  
his tenure and that he believes the practice began in March 2025).

28 <sup>6</sup> Daniel Moritz-Rabson, *By Refusing to Show Faces or Badges, ICE Opens Door to Vigilante*  
*Impersonators*, Truthout (July 19, 2025), <https://perma.cc/GCR9-UYAR>.

1 region—have lived this past year with unease. That is because, since early 2025,  
2 Californians have witnessed a deluge of anonymous masked agents jumping out of  
3 unmarked vans, refusing to identify themselves, and rounding up unsuspecting  
4 residents in various communities.<sup>7</sup> These federal agents have tackled the elderly,  
5 arrested children, shot at unarmed families, broken car windows to snatch people  
6 out of their cars, and indiscriminately arrested residents—citizens and non-citizen  
7 alike—all without identifying themselves, and often without even identifying the  
8 agency they work for.<sup>8</sup> Unsurprisingly, the overall sense of public safety in *amici*'s  
9 communities has markedly diminished.

13 The alarming and unprecedented increase in masked and unidentified federal  
14 agents ambushing residents have led jurisdictions in California to evaluate the same  
15 concerns raised by Defendants in passing the State statutes. California localities,  
16 including some *amici*, have passed legislation requiring law enforcement to  
17 identify themselves, whether that be local police or federal agents. These local  
18 enactments are evidence that local policy makers share the belief that community  
19 safety requires law enforcement operating in our communities to be identifiable.

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24 <sup>7</sup> See, e.g., J. David McSwane and Hanna Allam, *Unfettered and Unaccountable: How Trump Is*  
25 *Building a Violent, Shadowy Federal Police Force*, ProPublica (Oct. 18, 2025),  
<https://perma.cc/2PR3-L6V9>.

26 <sup>8</sup> In addition to ICE agents, officers from the Department of Homeland Security (DHS), Customs  
27 and Border Patrol (CBP), the Federal Bureau of Investigation (FBI), Drug Enforcement  
28 Administration (DEA), and the Bureau of Alcohol Tobacco and Firearms (ATF), entered cities  
across California. See Michael Lozano, *Behind the masks: Who are the people rounding up*  
*immigrants in California?* CalMatters (July 17, 2025), <https://perma.cc/5V2J-X433>.

1 San Jose, for example, recently unanimously approved an ordinance banning  
2 face coverings and requiring visible identification.<sup>9</sup> The author of the ordinance,  
3 Councilman Peter Ortiz, cited “San Jose’s commitment to community safety,  
4 accountability and the protection of immigrant and working-class families across  
5 the city” as a primary driver for the legislation.<sup>10</sup> In October, Riverside passed a  
6 resolution banning federal agents from wearing face coverings and requiring  
7 identification.<sup>11</sup> Likewise, Los Angeles County enacted similar requirements,<sup>12</sup>  
8 expressly finding that masked and unidentified agents increase fear and make it  
9 difficult for civilians to distinguish between law enforcement and imposters.<sup>13</sup> The  
10 findings also note that face coverings eliminate the ability to read an agent’s facial  
11 expression, which could increase the risk of conflict in high-stress interactions  
12 where tone and intent are particularly important.<sup>14</sup> These local enactments reflect a  
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18 <sup>9</sup> Joseph Geha, *San José Aims to Thwart ICE With New Policies on Masks and Public Properties*,  
19 KQED (Nov. 3, 2025), <https://perma.cc/EAN6-B3V7>.

20 <sup>10</sup> Joyce Chu, *San Jose moves to block ICE from city properties, tighten immigrant protection*,  
Local News Matters (Oct. 30, 2025), <https://perma.cc/HS3C-49V3>; Robert Handa, *San Jose*  
21 *passes ordinance requiring ICE agents to be masked*, NBC Bay Area (Oct. 29, 2025),  
22 <https://perma.cc/W4EL-JDM8> (“What we’re trying to say is ‘Hey, you are instilling fear across  
23 our country.’ We’re seeing videos of people being kidnapped, you know because people being  
masked, not identifying themselves. The first thing you think is some black clad individual  
grabbed my mom, grabbed my daughter, my brother, right?”).

24 <sup>11</sup> Anthony Victoria, *Riverside adopts resolution requiring federal agents to show ID and*  
25 *condemning mask use*, KVCR (Oct. 15, 2025), <https://perma.cc/CC3Z-5ZPS>.

26 <sup>12</sup> Kevin Tidmarsh, *LA County supervisors approve mask ban to take effect in 30 days, setting*  
27 *up showdown with feds*, LAist (Dec. 9, 2025), <https://perma.cc/6NBJ-W5EH>.

28 <sup>13</sup> Maaz Alin, *LA County Supervisors Vote to Ban Masked Law Enforcement Officers*, Santa  
Monica Daily News (Dec. 6, 2025), <https://perma.cc/DY86-PGNG>.

<sup>14</sup> *Id.*

1 shared conclusion from our constituents: public trust cannot co-exist with  
2 anonymous policing.

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4 **II. ANONYMOUS FEDERAL LAW ENFORCEMENT DRIVES FEAR**  
5 **AND CONFUSION, UNDERMINES PUBLIC SAFETY, AND**  
6 **IMPOSES CONCRETE HARMS ON *AMICI*'S JURISDICTIONS**

7 The federal government's recent departure from law enforcement norms—  
8 by deploying masked and unidentifiable agents into California communities—has  
9 predictably resulted in widespread and documented confusion among residents  
10 throughout the State. This confusion, coupled with a climate of fear, has  
11 undermined public safety and security by increasing incidents of dangerous  
12 escalation and violent encounters with law enforcement. It has also led to a  
13 proliferation of criminal impersonators posing as federal immigration agents  
14 targeting immigrants. Finally, this practice has led to concrete costs and harms on  
15 *amici*'s communities—ranging from reallocation of scarce local funds, to residents  
16 delaying or foregoing medical care, to disrupting local education, among other  
17 harms.  
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21 **A. Masked, Unbadged Federal Agents Who Purposefully Obscure**  
22 **Their Identities While on Duty Have Generated Widespread**  
23 **Confusion and Fear.**

24 It is well-documented that concealing one's identity, by wearing ski masks  
25 or balaclavas with just one's eyes visible, may engender confusion and fear.<sup>15</sup> To  
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<sup>15</sup> *E.g.*, Jenny Jarvie, *ICE agents wearing masks add new levels of intimidation, confusion during L.A. raids*, LA Times (July 7, 2025), <https://perma.cc/7TJF-8GHH>.

1 wit: Californians are so confused about identifying law enforcement, that they are  
2 increasingly reaching out to their elected officials for guidance. As Mayor of  
3 Burbank Nikki Perez explained, “We are receiving questions like, ‘How can I  
4 know if the masked man detaining me is ICE or a kidnapper?’ And, ‘Who can  
5 protect me if a masked man with a gun refuses to identify himself?’”<sup>16</sup> Los Angeles  
6 Mayor Karen Bass has stated that because federal law enforcement refuses to  
7 identify themselves, no one knows the identities of federal agents when they take  
8 people into custody.<sup>17</sup> San Jose Mayor Matt Mahan remarked, “At town halls and  
9 community meetings, I’ve heard from parents who are afraid to walk their children  
10 to school, neighbors afraid to go to the grocery store, afraid to go to work, residents  
11 afraid that even if they are here legally, they could still be targeted.”<sup>18</sup> Other local  
12 officials, including the Mayor of Pasadena, have expressed grave concerns about  
13 the increasing likelihood of accidental violence.<sup>19</sup> When anonymous federal agents  
14 are conducting immigration operations, armed and in plainclothes, there is an  
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21 <sup>16</sup> *Id.*

22 <sup>17</sup> Helen Jeong, *Growing calls for police to show ID and face amid rise in ICE impersonators*,  
23 NBC Los Angeles (June 23, 2025), <https://perma.cc/9L7U-U7E4> (“Who are these people?...  
24 We’re not sure who these armed men are. They show up without uniforms, they show up  
25 completely masked. They refuse to give ID, they're driving regular cars with tinted windows and  
26 in some cases, out of state license plates.”).

26 <sup>18</sup> Bay City News Service, *Regional: Local Cities, Counties Launch Regional Fund For Families  
27 Impacted By Ice Raids*, SF Gate (Sept. 19, 2025), <https://perma.cc/28QY-SN2N>.

27 <sup>19</sup> Nathan Solis & Richard Winton, *‘Who are these people?’ Masked immigration agents  
28 challenge local police, sow fear in L.A.*, LA Times (June 24, 2025), <https://perma.cc/PK9Y-MWZL>.

1 increased likelihood of their actions looking like criminal activity. This increases  
2 confusion, decreases legitimacy of law enforcement, endangers the safety of local  
3 law enforcement and federal agents alike, and escalates the potential for conflict  
4 and violence.

6 Not only are anonymous federal agents engendering confusion in residents,  
7 but local law enforcement also faces the same confusion while carrying out their  
8 duties. In one instance, immigration agents chased a gardener into a Long Beach  
9 restaurant and tackled him in front of two police officers.<sup>20</sup> One of those officers  
10 drew his gun at the scene, only holstering his weapon once he saw the agents'  
11 badges.<sup>21</sup> In Pasadena, a resident photographing an unmarked vehicle was  
12 confronted at gunpoint by a man wearing a police vest but no identification; to this  
13 day, it remains unclear whether the individual was a federal agent or a vigilante.<sup>22</sup>  
14 A San Bernardino driver fled masked men who broke his car window and fired  
15 gunshots at him. While he believed that his assailants were criminals he was trying  
16 to escape from, they ended up being federal agents acting anonymously.<sup>23</sup> Local  
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23 <sup>20</sup> Jacob Sisneros, *Amid string of raids, immigration agents chase gardener, tackle him in front*  
24 *of LBPD officers, witnesses say*, Long Beach Post News (Nov. 21, 2025),  
<https://perma.cc/AN7Y-9H7Z>.

25 <sup>21</sup> *Id.*

26 <sup>22</sup> Makenna Sievertson, *'No Vigilantes Act,'* LAist (June 23, 2025), <https://perma.cc/WEQ8-PMGS>.

27 <sup>23</sup> Nic Garcia & KJ Hiramoto, *ICE Agent Shoots at Car in California Standoff: Driver, CPB*  
28 *Agents Share Conflicting Accounts to Police*, FOX11 LA (Aug. 16, 2025),  
<https://perma.cc/5XAQ-ZXZA>.

1 officers have repeatedly drawn weapons on plainclothes ICE agents after mistaking  
2 their actions for armed assaults or kidnappings, only standing down once badges  
3 were belatedly produced.<sup>24</sup> In Fullerton, for example, a local police officer  
4 intervened after he saw a man get out of his car and point a gun at the driver of  
5 another car.<sup>25</sup> The gun-wielding man turned out to be an ICE agent in  
6 plainclothes.<sup>26</sup>

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9 When federal agents are masked and unidentified, their actions look like  
10 criminal activity and residents and local police have responded as if a crime is  
11 underway, causing widespread confusion and increased fear in *amici*'s  
12 communities.<sup>27</sup> Federal law enforcement should be held to the same standards of  
13 good policing as local officers are to ensure that policing is safe, accountable, and  
14 transparent—removing anonymity is the bare minimum towards those goals.  
15  
16

17 **B. Masked and Unidentifiable Policing Undermines Public Safety and**  
18 **Enables Criminal Impersonation.**

19 Not only does operating in masks without providing any agency or personal  
20 identifiers make it far more confusing for everyone, but these practices also raise  
21 serious concerns for public safety. To be sure, the presence of unidentifiable federal  
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<sup>24</sup> See, e.g., Sisneros, *supra* note 20.

25 <sup>25</sup> Dani Anguiano, *California police intervene as ICE agent in plain clothes points gun at woman*,  
26 The Guardian (Nov. 11, 2025), <https://perma.cc/XR9V-STR9>.

27 <sup>26</sup> *Id.*

28 <sup>27</sup> USA TODAY, *Why are ICE agents hiding behind masks? | The Excerpt* at 02:27 (YouTube,  
July 30, 2025), <https://perma.cc/5F89-VQWY>.

1 officers stokes confusion and fear (as described above), but also creates dangerous  
2 situations that also make policing more challenging and dangerous. Specifically,  
3 the federal government’s tactics make everyone less safe—from residents to local  
4 law enforcement to federal agents alike—because when people are unidentifiable,  
5 but carry guns, break into cars, and chase after people, community members and  
6 fellow officers are more likely to mistake them for lawbreakers.  
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9         And since federal agents typically do not notify local law enforcement when  
10 federal officers are operating in their community or a specific part of town, the risk  
11 to officers is exacerbated.<sup>28</sup> When these encounters involve use of force or  
12 weapons, the possibility for violence and tragedy further increases.<sup>29</sup> The federal  
13 government’s practice may place ICE and other federal officers at risk by  
14 preventing other officers and community members from readily identifying them  
15 as law enforcement and interacting with them accordingly.  
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18         Moreover, when federal agents are permitted to act anonymously, they may  
19 be more likely to feel a sense of impunity when engaging in unlawful conduct.  
20 Troublingly, studies show that anonymity—particularly facial concealment and  
21 lack of name identification—increases violent and aggressive behavior.<sup>30</sup> This  
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25 <sup>28</sup> Allie Preston, *Masked and Unidentifiable: The Risks of Federal Law Enforcement Operating Without Identification*, Ctr. for Am. Progress (Aug. 28, 2025), <https://perma.cc/4RYD-7CWN>.

26 <sup>29</sup> *See id.*; Sisneros, *supra* note 20.

27 <sup>30</sup> *See* Joe Dawson, *Who Is That? The Study of Anonymity and Behavior*, Ass’n for Psychological  
28 Sci. (Mar. 30, 2018), <https://perma.cc/Q9HG-LVT2> (discussing the rich body of research linking anonymity with abusive and violent behavior in digital and in-person interactions).

1 suggests that federal officers have brought fear and chaos to *amici*'s communities  
2 across the state in part *because* they are masked and anonymous. Masks also  
3 obscure facial expressions and muffle speech, heightening the risk of  
4 miscommunication and conflict, especially for non-English speakers during  
5 interactions with law enforcement.<sup>31</sup>

7  
8 Another preventable consequence of federal agents' increased practice of  
9 masking while carrying out immigration raids is that it has become increasingly  
10 difficult to discern legitimate officers from impersonators. Anonymous policing  
11 has spurred the rise of dangerous impersonations and vigilantes—and ill-  
12 intentioned wrongdoers have exploited this moment. In California, individuals  
13 posing as ICE agents have harassed businesses, threatened residents with firearms,  
14 and carried forged DHS credentials. In Fresno, for example, two men were arrested  
15 for impersonating ICE agents after they harassed customers at more than ten local  
16 businesses.<sup>32</sup> Police arrested a man in Huntington Park suspected of posing as an  
17 ICE agent when he was found with an unmarked vehicle, a loaded handgun, and a  
18 list of CBP radio codes.<sup>33</sup> In the Bay Area, police in Alameda recently arrested a  
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24 <sup>31</sup> See Marcus Woo, *Masks save lives, but may hinder communication*, ABC News (Dec. 26,  
25 2020), <https://perma.cc/CH9T-P4GC> (“[B]y muffling crucial sound frequencies, covering lips  
26 and facial expressions, and restricting mouth movements, masks can . . . exacerbate challenges  
already faced by those with language barriers or hearing loss . . .”).

27 <sup>32</sup> *2 men arrested for allegedly impersonating ICE officers and harassing shoppers in Fresno*,  
ABC 30 (Feb. 27, 2025), <https://perma.cc/8MVK-JYXN>.

28 <sup>33</sup> Solis & Winton, *supra* note 19.

1 man who had numerous fake Homeland Security Investigation badges, firearms,  
2 and a bulletproof vest.<sup>34</sup> And in Los Angeles County, police arrested a man driving  
3 a decommissioned police vehicle allegedly containing a forged DHS badge and a  
4 pellet gun.<sup>35</sup> In other areas of the country, criminals impersonating ICE agents have  
5 sexually assaulted, robbed, and kidnapped victims.<sup>36</sup> This targeting of vulnerable  
6 populations is not incidental; it is a predictable consequence of anonymous  
7 policing. And it directly undermines public safety and the public interest.  
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10           Indeed, current Acting ICE Director Todd Lyons has publicly stated that he  
11 is “not a proponent of the masks” and that criminal impersonation is “one of our  
12 biggest concerns.”<sup>37</sup> The Federal Bureau of Investigation (FBI), in its October  
13 bulletin to law enforcement agencies, warned that criminals are posing as ICE  
14 agents and targeting victims.<sup>38</sup> The FBI urged officers to clearly identify  
15 themselves during interactions with civilians.<sup>39</sup> And the problem is so acute that  
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22 <sup>34</sup> Amy Larson, *Driver with fake federal agent badges arrested in Alameda*, KRON 4 (Nov. 21,  
2025), <https://perma.cc/M8DK-J2U>.

23 <sup>35</sup> Solis & Winton, *supra* note 19.

24 <sup>36</sup> Jose Olivares & Lisa Dsjardins, *Rise of ICE agents wearing masks creates opportunity for*  
*imposters to conduct crimes*, PBS News Hour (July 7, 2025), <https://perma.cc/B74E-ZTBC>.

25 <sup>37</sup> Camilo Montoya-Galvez, *ICE head says he won't block agents from wearing masks, confirms*  
*use of Medicaid data*, CBS News (July 18, 2025), <https://perma.cc/GC5A-3MT7>.

26 <sup>38</sup> Dell Cameron & Caroline Haskins, *FBI Warns of Criminals Posing as ICE, Urges Agents to*  
*ID Themselves*, Wired (Nov. 4, 2025), <https://perma.cc/C9Q3-PETM>.

27 <sup>39</sup> *Id.*  
28

1 state legislators have spurred the introduction of bills to clarify laws related to  
2 impersonation and increase penalties for impersonating an officer.<sup>40</sup>

3  
4 So long as federal officers conceal their identities, they will continue to put  
5 *amici*'s residents and overall public safety at risk. *Amici* will continue to bear the  
6 costs of preventable escalation, investigate fear-driven and actual emergency calls  
7 about kidnappings and other apparent crimes in progress, and the increasing trend  
8 of vigilantes and criminal impersonation in our communities.  
9

10 **C. These Practices Have Imposed Concrete, Measurable Harms on**  
11 **Amici Jurisdictions and Their Residents.**

12 *Amici* also suffer tangible financial and operational harms when federal  
13 officers conduct immigration enforcement activities in disguise. To begin, local  
14 resources are diverted when local police departments must respond to increased  
15 calls from concerned residents. They then must further respond and investigate  
16 reports of unidentified federal officers who appear to be committing crimes as they  
17 interact with the public. For example, local law enforcement across California  
18 jurisdictions have also responded to 911 calls reporting kidnapping or hit-and-run  
19 accidents—only to discover that these emergencies involve actions by federal  
20 immigration agents.<sup>41</sup> In Riverside, the police were called after a purported off-  
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26 <sup>40</sup> See, e.g., *Impersonation of a peace officer or firefighter during a state of emergency or local*  
27 *emergency*, Sen. Bill 264, 2025-2026 Reg. Sess. (Cal. 2025).

28 <sup>41</sup> See, e.g., Alex Stone, *Los Angeles police responded to a kidnapping call. But instead found an ICE operation*, ABC News (June 25, 2025), <https://perma.cc/J2C5-ME2Q>.

1 duty ICE agent held a child at gunpoint.<sup>42</sup> In San Bernardino, a resident called 911  
2 saying that a group of masked men tried to get him to pull over, broke his car  
3 window, and shot at him.<sup>43</sup> He reported what he perceived to be a criminal incident  
4 to local police because he did not know who his assailants were.<sup>44</sup> In Pasadena,  
5 ICE agents wearing masks mistakenly detained a woman walking with her  
6 children, prompting a witness to call 911.<sup>45</sup> The witness recalled, “I didn’t know if  
7 I was witnessing a hate crime or a kidnapping.”<sup>46</sup> Jurisdiction after jurisdiction, it  
8 goes on.

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12 Local law enforcement resources are also diverted when additional protocols  
13 and training is implemented in response to federal agents’ escalated tactics. In some  
14 jurisdictions, like Los Angeles, the Police Department (LAPD) adopted protocols  
15 requiring officers responding to immigration enforcement activities to verify the  
16 credentials of the lead federal agent on the scene, and document on body-worn  
17 cameras.<sup>47</sup> In San Francisco, the San Francisco Police Department has issued a  
18 Department Notice instructing officers that if they “encounter individuals who are  
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22 <sup>42</sup> Laurie Perez, *Southern California family says off-duty agent detained and held their teenage*  
23 *son at gunpoint*, CBS News (Nov. 18, 2025), <https://perma.cc/UHJ3-LBEJ>.

24 <sup>43</sup> Garcia & Hiramoto, *supra* note 23.

25 <sup>44</sup> *Id.*

26 <sup>45</sup> Angelique Brenes, *ICE agents detain mother in Pasadena in front of children without showing*  
27 *a warrant*, KTLA (June 28, 2025), <https://perma.cc/LD2L-7434>.

28 <sup>46</sup> *Id.*

<sup>47</sup> Jared Bennett, *LAPD chief instructs officers to verify identity of federal immigration agents*,  
LAist (July 3, 2025), <https://perma.cc/U6GF-PF9K>.

1 *not readily identifiable* as federal agents, [they] should, when safe and practical to  
2 do so, attempt to verify the credentials of the on-scene federal lead-agent,  
3 supervisor, or agent in charge, and capture the verification process on [body-worn  
4 cameras].<sup>48</sup> Each of these additional steps requires more resources and training to  
5 execute.  
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8         Conversely, when residents associate law enforcement with fear and  
9 violence, serious and violent crimes go unreported and unaddressed. LAPD calls  
10 for service fell 28 percent after immigration raids began in Los Angeles in early  
11 June of 2025.<sup>49</sup> LAPD has been forced to expend resources and take remedial  
12 actions to reestablish trust: planning listening sessions, increasing outreach in  
13 immigrant neighborhoods, starting a citizens police academy for Spanish speakers,  
14 and meeting with faith and community leaders.<sup>50</sup> In the inland region, hotline  
15 operators set up to handle calls regarding immigration enforcement noticed that  
16 callers were instead reporting crime—particularly domestic violence—because  
17 they did not feel safe calling police.<sup>51</sup>  
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23 <sup>48</sup> *Department Notice: Response to Incidents Involving Federal Civil Immigration Enforcement*,  
24 San Francisco Police Dep't (Aug. 26, 2025), <https://perma.cc/KQ9X-QP5W> (emphasis in  
original).

25 <sup>49</sup> Libor Jany & Hailey Wang, *As ICE raids surged this summer, emergency calls to LAPD*  
26 *plummeted*, LA Times (Sept. 20, 2025), <https://perma.cc/K4CW-KJ5L>.

27 <sup>50</sup> *Id.*

28 <sup>51</sup> *Hearing on S.B. 627 Before the Senate Standing Committee on Public Safety, 2025-2026 Reg.*  
Sess. (Cal. 2025) (statement of Hector Pereira, Inland Coalition for Immigrant Justice).

1 To assuage residents’ concerns and reestablish trust, some counties have  
2 been forced to allocate additional funding to immigrant support services. Santa  
3 Clara, for example, has allocated over \$8 million for services for the year, including  
4 \$1.4 million in emergency funds, to meet the heightened need by members in the  
5 community.<sup>52</sup> Similarly, Alameda County approved a \$3.57 million emergency  
6 allocation after calls to a county response hotline jumped by 500 percent.<sup>53</sup> Bay  
7 Area elected officials worked together to start a fund to support direct emergency  
8 aid for families affected by federal law enforcement.<sup>54</sup>

9 Moreover, *amici* jurisdictions are suffering from the social and economic  
10 impact of a pervasive climate of fear described above. The threat of apprehension  
11 or harassment by heavily armed and unidentifiable men—and the inability to  
12 distinguish between federal authorities and criminal imposters—is enough to keep  
13 residents from going to work, patronizing local businesses, and sending children to  
14 school. Between May and June 2025, when immigration agents conducted raids in  
15 California, 742,492 fewer Californians reported to work.<sup>55</sup> The majority of those

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23 <sup>52</sup> *County of Santa Clara Allocates Additional Funding for Rapid Response as Immigration*  
24 *Enforcement Activity Escalates in California*, Cnty. of Santa Clara (June 20, 2025),  
<https://perma.cc/AC3Q-S44M>.

25 <sup>53</sup> Ayah Ali-Ahmad, *Alameda County approves \$3.6 million to scale up immigrant defense amid*  
*ICE surge*, Oaklandside (Oct. 15, 2025), <https://perma.cc/47KD-32C6>.

26 <sup>54</sup> Bay City News Service, *supra* note 18.

27 <sup>55</sup> Univ. of Cal., Merced, Cmty. and Lab. Ctr., *The Effects of Recent Federal Immigration*  
28 *Enforcement on Private Sector Employment in California and Washington, D.C.* at 4 (Nov.  
2025), <https://perma.cc/34TR-G2DS>.

1 who stayed home were U.S. citizens.<sup>56</sup> Farmers reported major labor shortages, the  
2 effects of which will soon be reflected in higher grocery prices.<sup>57</sup> A chilling effect  
3 has swept through the entire restaurant industry, both for employees and  
4 customers.<sup>58</sup> In a recent study conducted in Los Angeles County, 43 percent of  
5 Hispanic/Latino business owners reported revenue losses of 50 percent or more  
6 since June.<sup>59</sup> The mayor of Artesia predicted that the impact of empty businesses  
7 on sales tax revenue would be “horrific.”<sup>60</sup> Indeed, experts estimate that without  
8 undocumented workers’ household spending on goods and services, California  
9 jurisdictions could lose over \$66 billion.<sup>61</sup>

13 The climate of fear extends even further, impacting education, public health  
14 and healthcare delivery in *amici*’s jurisdictions. Fewer families enrolled their  
15 children in LA public schools for the 2025-2026 school year, with educators  
16 reporting widespread fear and distress among both students and staff.<sup>62</sup> Patients

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19 <sup>56</sup> *Id.*

20 <sup>57</sup> Suhauna Hussain & Md Fazlur Rahman, *California’s economy is already getting hit by*  
21 *immigration raids*, LA Times (July 30, 2025), <https://perma.cc/QD2S-69N7>.

22 <sup>58</sup> Andrew Lopez, *ICE raids push Boyle Heights restaurants to the brink: ‘I don’t know how*  
23 *much longer we can do this,’* Boyle Heights Beat (Aug. 7, 2025), <https://perma.cc/QQG9-K4GJ>  
(including in Boyle Heights, where a dozen local restaurants reported losing 50 percent or more  
of their customers or revenue over the span of several weeks).

24 <sup>59</sup> Kennedy Zak, *Fear of ICE Raids Drains Businesses*, LA Bus. J. (Nov. 17, 2025),  
25 <https://perma.cc/Y6JR-S6JA>.

26 <sup>60</sup> Hussain & Rahman, *supra* note 57.

27 <sup>61</sup> Bay Area Council Econ. Inst. & Univ. of Cal., Merced, *The Economic Impact of Mass*  
*Deportation in California* at 30 (June 2025), <https://perma.cc/B45C-MCM6>.

28 <sup>62</sup> Iris Kwok & Howard Blume, *High school bullying is up, attendance down as ICE raids sow*  
*‘climate of distress,’ study says*, LA Times (Dec. 9, 2025), <https://perma.cc/CE33-J34V>; ABC

1 have avoided hospitals, clinics, and pharmacies, afraid that seeking care will put  
2 them at risk of violence.<sup>63</sup> One community health network had to provide mental  
3 health support for its employees after masked immigration agents wearing military-  
4 style tactical gear pointed a gun at medical providers tending to homeless patients  
5 in MacArthur Park.<sup>64</sup> These quantitative and qualitative harms brought forth by the  
6 federal Government's mandates bring immediate and long-term impacts to *amici*.  
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9 **III. SERIOUS CONSTITUTIONAL VIOLATIONS HAVE OCCURRED**  
10 **IN *AMICI*'S COMMUNITIES AND ANONYMITY CURTAILS**  
11 **RESIDENTS' ABILITY TO SEEK ANY REDRESS**

12 Finally, *amici* are deeply disturbed by hundreds of reports of constitutional  
13 violations by federal agents for which our residents have extreme difficulty seeking  
14 relief given the anonymity of the law enforcement personnel. Without a knowledge  
15 of agency affiliation, officers' names, badge numbers, or a memory of their faces,  
16 victims cannot identify responsible parties, locate detainees, or pursue legal  
17 remedies when their rights have been violated.<sup>65</sup>  
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21 News, *LA school enrollment drops amid ICE raids* (YouTube, Nov. 30, 2025),  
22 <https://perma.cc/34NA-7AXV>.

23 <sup>63</sup> Enrique Chiabra, *Healthcare Clinic Reports Appointment Cancellations and No-Shows Amid*  
24 *Fear of ICE Raids*, Ctr. for Health Journalism (July 19, 2025), <https://perma.cc/D99R-M7HA>;  
25 LAist, *No-shows and cancellations are up at some L.A. hospitals since federal immigration*  
26 *action began*, Boyle Heights Beat (July 9, 2025), <https://perma.cc/GM8T-X6ZX>.

26 <sup>64</sup> Claudia Boyd-Barrett, *California Faces Limits as It Directs Health Facilities To Push Back*  
27 *on Immigration Raids*, Kaiser Fam. Found. Health News (Oct. 30, 2025),  
28 <https://perma.cc/MRZA-3Z37>.

<sup>65</sup> Josh Campbell, *As ICE escalates its tactics, are federal agents truly 'untouchable' in the eyes*  
*of the law?* CNN (Nov. 15, 2025), <https://perma.cc/T6E5-D8X9>.

1 According to the Department of Homeland Security, more than 10,000  
2 people have been arrested in California since the raids began.<sup>66</sup> During these raids,  
3 masked and unidentified federal officers have thrown unarmed, cooperative  
4 residents to the ground, choked them, beaten them, used tear gas and pepper spray,  
5 and then refused to administer medical care to treat officer-caused injuries.<sup>67</sup>  
6 Residents, including the American citizens below, have been detained for multiple  
7 days and denied basic needs such as water, food, medicine, and bathroom access.<sup>68</sup>  
8 Families and legal advocates struggle to locate detainees when it is unclear which  
9 agency made the arrest.<sup>69</sup>

13 These accounts, including Defendants' declarants' experiences,<sup>70</sup> should be  
14 outliers. They are not. A disabled Army veteran driving to work in Camarillo  
15 encounters masked federal agents who surround him, throw canisters of tear gas at  
16 his vehicle, and pull him through a broken window while blasting him with pepper  
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20 <sup>66</sup> Anita Chabria, *Homeland Security says it doesn't detain citizens. These brave Californians*  
21 *prove it has* (Dec. 12, 2025), <https://perma.cc/W7VN-5J78>; Helen Jeong, *DHS arrests over*  
22 *10,000 undocumented immigrants, Sec. Noem says*, NBC Los Angeles (Dec. 12, 2025),  
<https://perma.cc/A697-QFJS>.

23 <sup>67</sup> U.S. Senate, Permanent Subcommittee on Investigations, *Unchecked Authority: Examining*  
24 *the Trump Administration's Extrajudicial Immigration Detentions* at 5, 17, 19, 30, 32-33, 35-36,  
47-48, 53-57 (Dec. 9, 2025), <https://perma.cc/LTT9-S2DC> (hereinafter U.S. Senate Report).

25 <sup>68</sup> *Id.* at 3-7.

26 <sup>69</sup>*Id.* at 45; *see also* *Hearing on S.B. 805 Before the Senate Standing Committee on Public Safety,*  
27 *2025-2026 Reg. Sess. (Cal. 2025)* (statement of Jeannette Zanipatin, Coalition for Humane  
Immigrant Rights).

28 <sup>70</sup> *See* Declarations attached to Defendants' Opposition to Plaintiff's Motion for a Preliminary  
Injunction [Dkt. No. 29].

1 spray.<sup>71</sup> Similar incidents in San Pedro (U.S. citizen dragged out of his car through  
2 a window broken by masked federal agents); in Hollywood (Ph.D. student violently  
3 tackled to the ground and handcuffed by five masked agents in plainclothes); in  
4 Montebello (U.S. citizen assaulted, pinned against a wall on private property by a  
5 dozen masked agents with AR-15 machine guns); in Sylmar (small business owner  
6 assaulted by eight masked agents who refused to look at offered U.S. passport).<sup>72</sup>  
7  
8 In Camarillo, Jaime Alanis Garcia died after fleeing from masked federal agents,  
9 falling from a roof, and suffering from critical injuries during an immigration  
10 raid.<sup>73</sup>  
11  
12

13           And federal agents make no changes to their behavior when around children.  
14 In Arleta, masked, plainclothes federal agents, without identifying themselves,  
15 screamed “put your hands up” at Andreina Mejia and her fifteen-year-old special  
16 needs son—pulling him out of her car at gunpoint.<sup>74</sup> Nor do behaviors change for  
17 pregnant women. Cary Lopez Alvarado, a U.S. citizen in Hawthorne, was nine  
18 months pregnant when she was assaulted, handcuffed, and shackled in chains by  
19 federal agents. She experienced intense stomach pains due to her treatment by  
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25 <sup>71</sup> U.S. Senate Report, *supra* note 67, at 46-48 (George Retes).

26 <sup>72</sup> *Id.* at 18-20 (Julian Cardenas), 30-31 (Job Garcia), 32-33 (Brian Gavidia), 43-44 (Alberto Nila).

27 <sup>73</sup> Melissa Gomez, *He was ‘trying to stay alive.’ Family memorializes man who died in Camarillo immigration raid*, LA Times, (July 22, 2025), <https://perma.cc/E8SJ-SQDM>.

28 <sup>74</sup> U.S. Senate Report, *supra* note 67, 16-18.

1 federal agents and sought treatment at the hospital, ultimately giving birth four days  
2 after her ordeal.<sup>75</sup>

3  
4 The environment created by Plaintiff and its law enforcement agencies  
5 foster impunity. Reports indicate that federal officers face little risk of investigation  
6 for improper use of force, a perception reinforced by public statements from senior  
7 Administration officials.<sup>76</sup> The President himself confirmed this, telling reporters  
8 that law enforcement was “allowed to do whatever the hell they want” when  
9 interacting with the public.<sup>77</sup> Agents are behaving as though it is unlikely that they  
10 will be held accountable for violating our community members’ rights precisely  
11 because it *is* unlikely when residents cannot determine the identities of agents.<sup>78</sup>

12  
13 Although the challenged Acts will not prevent constitutional violations from  
14 occurring, they restore a minimum (and necessary) level of accountability and  
15 make meaningful judicial review possible—thereby deterring unlawful conduct.

## 16 CONCLUSION

17 For these reasons, *amici* respectfully requests that this Court deny Plaintiff’s  
18 Motion for Preliminary Injunction.

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<sup>75</sup> *Id.*

26 <sup>76</sup> McSwane & Allam, *supra* note 7; *see also* Campbell, *supra* note 65.

27 <sup>77</sup> WTVC NewsChannel 9, *LIVE: President Trump addresses the federal crackdown on crime in*  
*Washington, D.C.* at 26:05 (YouTube, Aug. 11, 2025), <https://perma.cc/79GA-DMJ5>.

28 <sup>78</sup> McSwane & Allam, *supra* note 7.

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Respectfully submitted,

DATED: December 29, 2025

**PUBLIC RIGHTS PROJECT**

**By:** */s/ Jean Larsen*  
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**Appendix A - List of Amici Curiae**

**Local Governments**

- City of Alameda, California
- County of Alameda, California
- City of Culver City, California
- City of Long Beach, California
- County of Los Angeles, California
- City of Oakland, California
- City of Sacramento, California
- County of San Diego, California
- City and County of San Francisco, California
- City of Santa Monica, California
- City of West Hollywood, California

**Local Government Leaders**

- Bryan “Bubba” Fish  
*Councilmember, City of Culver, California*
- Yasmine-Imani McMorrin  
*Councilmember, City of Culver, California*
- Matt Mahan  
*Mayor, City of San Jose, California*

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**CERTIFICATE OF COMPLIANCE**

The undersigned, counsel of record for *amici curiae* local governments and local government leaders, certifies that this brief contains 5907 words, which complies with the word limit of L.R. 11-6.1.

Dated: December 29, 2025

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