



Agenda Report

Fullerton City Council

MEETING DATE: OCTOBER 21, 2025

TO: CITY COUNCIL

SUBMITTED BY: DAISY PEREZ, DEPUTY CITY MANAGER

PREPARED BY: DAISY PEREZ, DEPUTY CITY MANAGER

SUBJECT: RESPONSE TO RECENT FEDERAL IMMIGRATION ENFORCEMENT OPTIONS

SUMMARY

Council Member Zahra requested, supported by Mayor Pro Tem Charles, agendaizing an item to consider ways the City may assist individuals impacted by recent Immigration and Customs Enforcement (ICE) activities. City Council also requested information on actions taken by other jurisdictions, including Costa Mesa, and potential approaches applicable in Fullerton.

PROPOSED MOTION

1. Receive and file report.
2. Provide direction to staff.

ALTERNATIVE OPTIONS

- Approve the Proposed Motion
- Maintain current practices and continue providing information and referral resources through the City website and Police Department
- Direct staff to prepare a resolution affirming the City policy position regarding immigration enforcement for future City Council consideration
- Direct staff to evaluate partnership opportunities with nonprofit and/or legal aid organizations and return with funding and agreement options
- Take no further action at this time and continue monitoring regional and legislative developments
- Other options brought by City Council.

STAFF RECOMMENDATION

Staff recommends the Proposed Motion.

CITY MANAGER REMARKS

None.

PRIORITY POLICY STATEMENT

This item matches the following Priority Policy Statement:

- Public Safety.

FISCAL IMPACT

Fiscal impacts would depend on City Council direction. Existing department budgets can absorb minimal costs associated with continued public information and outreach. Staff would return with a detailed fiscal analysis and any necessary budget appropriations for City Council approval, should City Council direct staff to develop new programs or funding allocations.

BACKGROUND AND DISCUSSION

Recent immigration enforcement activities in Southern California have prompted several jurisdictions to review policies and identify appropriate ways to support residents while complying with state and federal law. Common approaches among cities focused on public education, community partnerships and coordination with nonprofit organizations providing legal and humanitarian assistance.

The City of Fullerton complies with the California Values Act (Senate Bill 54), which limits using local law enforcement resources for federal immigration enforcement except under specific circumstances involving defined criminal activity. The Fullerton Police Department does not participate in civil immigration enforcement and maintains policies consistent with SB 54. The City also provides information regarding available community and legal resources through its website and the Fullerton Police Department immigration information page, which includes links to regional service providers and guidance on residents' rights.

City Council voted 4 – 0 – 1 (Dunlap absent) to direct staff to prepare and submit an amicus brief in coordination with other local jurisdictions, regarding *Perdomo, et al. v. Noem, et al.* (United States District Court for the Central District of California, Case No. 2:25-cv-05605-MEMF-SP) at the August 19, 2025 City Council meeting. The case challenges the legality of “roving patrols” conducted by federal immigration enforcement agencies and alleges such practices may result in detentions without reasonable suspicion. The City intended participation in the amicus brief to express support for constitutional due process and fair enforcement practices consistent with established law.

The U.S. Supreme Court reversed the temporary restraining order on August 29, 2025, thereby overturning earlier district and appellate court decisions in *Noem v. Vasquez Perdomo*. The Supreme Court ruling allows the federal government to resume immigration enforcement operations at public locations such as bus stops, car washes and home

improvement stores while litigation continues.

Council Member Zahra requested, supported by Mayor Pro Tem Charles, agendaizing an item to consider ways the City may assist individuals impacted by recent Immigration and Customs Enforcement activities during the September 16, 2025 City Council meeting. City Council asked staff to review actions taken by other jurisdictions, including Costa Mesa, and evaluate how similar approaches could apply in Fullerton.

Cities throughout Los Angeles and Orange Counties have taken varying approaches, primarily focused on community education, partnerships with nonprofit organizations and public reaffirmation of local policies consistent with state law. Staff reviewed comparable reports from neighboring jurisdictions, including the City of Whittier August 12, 2025 staff report titled *Options for City Responses to Federal Immigration Enforcement*. That report summarized a range of actions taken by local and regional agencies in response to community concerns regarding immigration enforcement activity.

The following table summarizes recent actions documented in the Whittier report with updates to include the Cities of Costa Mesa, Irvine and Anaheim. The table summarizes the actions proposed to other City Councils and the final direction or outcomes taken.

City	Date	Potential Action	Passed / Approved	Outcome
Anaheim	7/15/2025	Consider approving an allocation of up to \$250,000 from existing allocated funds for Anaheim Contigo for emergency grants to impacted families and others through the Anaheim Community Foundation; and if approved, authorize the City Manager, or their designee, to make payments to the Anaheim Community Foundation in amounts corresponding to the emergency assistance grant applications that have been verified and approved on a bi-weekly basis. (Exhibit A)	Yes	Approved Anaheim Contigo Emergency Assistance Program, allocating up to \$250,000 from existing department budgets to Anaheim Community Foundation (ACF) for rent, utility, and food assistance for residents impacted by immigration enforcement. Applications processed through Family Resource Centers (Ponderosa, Miraloma, Downtown, and Mobile FRCs).
Carpinteria	7/28/2025	Authorizing Staff to Draft and Submit Letters in Support of State and Federal Legislation (Exhibit B)	Yes	The City Council voted to authorize staff to draft and submit letters in support of Senate Bill 627 (No Secret Police Act – California), Senate Bill 805 (No Vigilantes Act – California), H.R. 673 (ICE Security Reform Act – federal), S.2212 (the VISIBLE Act – federal), and H.R. 4176 (No

City Support for Residents Impacted by Immigration Enforcement Activities Options
October 21, 2025 - Page 4

				Secret Police Act of 2025 – federal).
Costa Mesa	8/5/2025	Consider Adoption of Proposed Resolution No. 2025-XX affirming the City's Core Values; Consider Adoption of Proposed Resolution No. 2025-XX supporting California Senate Bill 805 (Perez), "No Vigilantes Act." Consider approval of the proposed Letter of Support for SB 805, the "No Vigilantes Act." (Exhibit C)	Yes	Adopted a resolution affirming Core Values and supporting SB 805 ("No Vigilantes Act"); directed \$100,000 from the General Fund Contingency (\$50k to Enough for All Fund via Redemption Church; \$50k to Someone Cares Soup Kitchen) for direct resident assistance; directed staff to identify legal defense fund options and partners.
Costa Mesa	9/2/2025	Receive and file update on options to provide legal defense funding to assist residents in connection with federal immigration enforcement and direct staff accordingly. (Exhibit D)	Yes	Approved creation of a \$200,000 Legal Defense Fund (General Fund) designating Immigrant Defenders Law Center (primary) and Public Law Center (secondary).
Costa Mesa	9/2/2025	Consider whether and how to participate in Perdomo, et al. v. Noem, et al., United States District Court for the Central District of California, Case No. 2:25-cv-05605-MEMF-SP. (Exhibit D)	Yes	City Council authorized City Attorney to participate in Perdomo v. Noem litigation by submitting an amicus brief to the Court.
Costa Mesa	9/2/2025	Request direction on tracking at-fault evictions. (Exhibit E)	Direction Provided	Received updates on donation implementation; directed staff to explore tracking at-fault evictions and establishment of a Rental Registry; discussed privacy and Public Records Act exemptions. Identified registry implementation cost (~\$300k startup, ~\$85k annual maintenance, \$29–\$400 per unit fees; typically ~\$200); potential staffing up to seven FTE.

City Support for Residents Impacted by Immigration Enforcement Activities Options
October 21, 2025 - Page 5

County of Los Angeles	7/29/2025	Instruct County Counsel to Create a Draft County Ordinance Prohibiting Law Enforcement Officers from Concealing their Identities in Los Angeles County Unincorporated Areas	Yes	Motion from Supervisors Hahn and Solis instructs County Counsel to report back to the Board of Supervisors in 60 days with proposed language for a draft ordinance that would prohibit all law enforcement officers working, including Federal agents operating within the County, from wearing any mask or personal disguise while interacting with the public in the course of their duties within the unincorporated areas. The ordinance would include exceptions for undercover operations and for authorities wearing gas masks, fire/smoke protection masks or medical grade masks. It would require all law enforcement officers, including Federal agents, to wear visible identification and agency affiliation while interacting with the public in the course of their duties within the unincorporated areas.
Cudahy	7/15/2025	Consideration and Adoption of Resolution No. 25-37 – A Resolution in support of H.R. 3101 (SHIELD Act) (Exhibit F)	Yes	This Resolution expresses support for the U.S. House H.R. 3101, the “Securing Help for Immigrants through Education and Legal Development” (SHIELD) Act, to enhance due process and legal representation for individuals facing deportation.
Cudahy	7/15/2025	Consideration and Adoption of Resolution No. 25-38 – A Resolution in support of Senate Bill 48 (Safe Access to Schools) (Exhibit G)	Yes	This Resolution expresses the City’s strong support for Senate Bill 48 (Safe Access to Schools), protecting student and families from immigration enforcement activity on school campuses.
Cudahy	7/15/2025	Consideration and Adoption of Resolution No. 25-39 – A Resolution in support of Senate Bill 805 (No Vigilantes Act) (Exhibit H)	Yes	This Resolution expresses the City’s support for Senate Bill 805 (No Vigilantes Act) promoting transparency and public safety by requiring clear identification of law enforcement personnel and addressing unauthorized impersonation.

City Support for Residents Impacted by Immigration Enforcement Activities Options
October 21, 2025 - Page 6

Cudahy	7/15/2025	Discussion and Adoption of Resolution No. 25-46. Encouraging Small Businesses to Uphold Immigrant Rights and Adopt Policies to Limit Civil Immigration Enforcement on Private Premises (Exhibit I)	Yes	This Resolution encourages local small businesses to uphold immigrant rights by adopting internal policies, a "Safe Business Program," that limit civil immigration enforcement activities on private premises.
Downey	7/8/2025	Budget Allocation for Individuals and Families Affected by Recent ICE Raids	Yes	The City Council approved the allocation of \$25,000 from the General Fund to assist individuals and families impacted by recent ICE activity. A total of \$15,000, distributed as \$5,000 each, will be awarded to three local organizations: Desert Reign Church, Food Help; Downey PTA Helps; and Downey First Christian Church – Food Help to support food bank services. The remaining \$10,000 will be provided to Community Legal Aid SoCal to host four resource workshops for Downey community and businesses.
Downey	7/8/2025	Amend the City's Legislative Platform to Include Support for Immigration Reform	Yes	The City Council amended the City's legislative platform to include advocacy for immigration reform, which would allow writing advocacy letters in support of immigration reform that leads to a comprehensive solution and offers a path to citizenship. The updated platform, along with a letter from the Downey City Council, will be sent to the City's federal representatives to advocate for the City's position on the issue.
Downey	7/8/2025	Consideration and Adoption of a Resolution Regarding Recent Actions of the Federal Government Pertaining to Immigration Enforcement Actions Within the City (Exhibit J)	Yes	Resolution No. 25-8314 calls on federal elected representatives to demand (a) that federal immigration enforcement officers conduct operations with due process, no masks, and identify themselves, and (b) that ICE agents only target criminals. It also requires staff to maintain a "Know Your Rights" webpage, affirms the City's role in protecting the rights of residents, and clarifies that the Downey

City Support for Residents Impacted by Immigration Enforcement Activities Options
October 21, 2025 - Page 7

				Police Department does not participate in immigration enforcement.
Downey	7/8/2025	Consideration of an Ordinance Relating to the Prohibition of Face Coverings for Law Enforcement (Exhibit K)	No	The proposed ordinance would have prohibited federal immigration agents and every law enforcement officer from wearing face coverings. There was concern among the City Council that the provisions in the ordinance relating to law enforcement other than the City's own were not enforceable and not within the City Council's jurisdiction.
Downey	7/8/2025	Adopt Resolution in Support of Senate Bill 627 and Senate Bill 805 – Immigration Enforcement and Identification, and Take Related Actions	Yes	The Resolution supports Senate Bill 627 (No Secret Police Act) which makes it a crime for a law enforcement officer to wear any mask or personal disguise while interacting with the public in the performance of their duties and Senate Bill 805 (No Vigilantes Act), which aims to expand police impersonation laws.
Goleta	7/21/2025	Adopt a Resolution Entitled "A Resolution...Making a Call to Action to All of its Federally Elected Representatives in Congress to Advocate on Behalf of Immigrants Who Reside and Work in the City of Goleta" (Exhibit L)	Yes	This Resolution urges federal lawmakers to advocate for immigrant residents. This Resolution supports California Senate Bill 627 and directs the City to file a public records act request about ICE activities in the region. It also reallocations \$100,000 from the City's childcare and economic development budgets to support local nonprofits providing legal aid and mental health services to immigrant families impacted by enforcement.
Huntington Park	6/25/2025	Consideration and Adoption of a Resolution Condemning Non-Transparent Federal Immigration Enforcement Tactics and Affirming Community Safety Principles (Exhibit M)	Yes	This Resolution condemns federal immigration enforcement tactics, demands transparency from federal officers, and directs the Huntington Park Police Department to take steps to ensure transparency and public safety by verifying the clear identification of federal

City Support for Residents Impacted by Immigration Enforcement Activities Options
October 21, 2025 - Page 8

				immigration agents operating within the City's jurisdiction.
Irvine	8/12/2025	Consider providing formal support for Perdomo et al. v. Noem et al. by authorizing the City Attorney to explore participation and potential submission of an amicus brief consistent with City policy on immigration enforcement.	Yes	City Council directed the City Attorney to draft an amicus brief supporting the lawsuit and return to a future Council meeting for review prior to filing.
Lynwood	7/15/2025	Discussion of the Creation of a City of Lynwood Justice Fund and Consideration of Appropriation of Funds to Support the Justice Fund (Exhibit N)	Yes	City Council approved the creation of a City of Lynwood Justice Fund and appropriation of funds to support legal aid and resources for immigrants facing deportation with the City of Lynwood Justice Fund.
Lynwood	7/15/2025	Consideration and Adoption of a Resolution Authorizing the City to Initiate the Formation of a Joint Powers Authority (JPA) with Gateway Cities to Monitor and Litigate Unlawful Federal Immigration Enforcement Actions (Exhibit O)	Yes	This Resolution authorized the City to take steps to form a Joint Powers Authority with Gateway Cities to monitor unlawful federal immigration enforcement practices affecting local communities. The Resolution allocates \$100,000 from the General Fund to support the JPA's initial operations and legal capacity. The final Joint Powers agreement will be presented to the City Council at a future date.
Montebello	6/25/2025	Adopt Resolution No. 25-59 Approving Humanitarian Services Funding for Families Impacted by the U.S. Immigration and Customs Enforcement (ICE) Raids (Exhibit P)	Yes	This Resolution appropriated \$100,000 in emergency funding into a newly created "Humanitarian Assistance Program" Fund to support families affected by recent federal immigration raids. The program will help families that may be financially impacted and unable to work, or who are in need of other essential financial assistance to provide for the welfare of their family.
Orange	7/22/2025	Consideration of a Resolution Relating to the Preservation of the Public Trust in Law Enforcement Officers and Law	No	The City Council voted to table the draft resolution taking a stance against the use of face coverings by federal immigration agents, citing the city's lack of

City Support for Residents Impacted by Immigration Enforcement Activities Options
October 21, 2025 - Page 9

		Enforcement Agencies. (Exhibit Q)		legal authority to override the federal government.
San Diego	7/23/2025	City of San Diego Executive Order No. 2025-1 by the Mayor (Exhibit R)	Authority per Charter	The Mayor of the City of San Diego signed an Executive Order ordering (a) Police Department to maintain policies against engaging in immigration enforcement and related direction; (b) staff to share "Know Your Rights" material; (c) all departments to update policies/training relating to California Values Act (CVA), (d) submission of a FOIA request to federal departments, convene roundtables to discuss immigration issues within the city, and related items to strengthen local policy.
Santa Ana	7/1/2025	Adopt a Resolution Making a Call to Action Regarding ICE Immigration Enforcement. (Exhibit S)	Yes	This Resolution calls for federal elected representatives to advocate for the people who reside and work in the city to: (a) end ICE immigration, federal enforcement and military presence in the City; (b) insist that ICE immigration and federal enforcement officers comply with 8 C.F.R. 287.8(c)(iii) to ensure that they properly identify themselves as such; and (c) demand that ICE immigration cease all raids in public places.
Santa Ana	7/1/2025	Submission of Freedom of Information Act (FOIA) Request to U.S. Immigration and Customs Enforcement (ICE) (Exhibit T)	Yes	This action directs the City Manager to submit a FOIA request to ICE seeking records pertaining to immigration enforcement activity in the city. The request was submitted and is still pending.
Santa Ana	7/1/2025	Consider a Temporary Program of Financial Assistance for Families Impacted by Federal Immigration Enforcement Actions (Exhibit U)	Yes	City Council voted to direct the City Manager to establish emergency assistance programs for families impacted by immigration enforcement using \$100,000 from City events budget.
Whittier	8/12/2025	Consider a resolution outlining potential City responses to federal immigration enforcement,	Yes	Adopted Resolution No. 2025-38, allocating \$130,000 to the Hispanic Outreach Taskforce and Interfaith Food Center for

		including local aid funding, legal coordination, and policy direction. (Exhibit V)		families impacted by enforcement; \$50,000 to support local legal aid and paperwork assistance; directed monthly implementation updates; and added multiple advocacy provisions urging state and federal immigration reform.
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City Council may consider several funding and implementation models based on practices observed in other jurisdictions in evaluating approaches to support Fullerton residents impacted by immigration enforcement. Legal analyses confirm cities may lawfully allocate local General Fund dollars or reserves to support legal defense or humanitarian programs for affected residents. These funds are fully discretionary and not subject to federal restrictions. However, agencies may not use federal and restricted funds - such as Community Development Block Grant (CDBG), HOME or other state and federal allocations - for immigration-related legal assistance, as federal regulations prohibit using these sources to assist individuals without lawful immigration status.

Cities such as Costa Mesa and Santa Ana identified discretionary funding sources to support similar initiatives. Costa Mesa allocated funds from its General Fund Contingency to provide immediate relief and establish a legal-defense program, while Santa Ana discussed potentially reallocating portions of its Special Events budget to launch a comparable initiative. Should the Fullerton City Council wish to pursue a similar strategy, staff would seek direction whether to identify and reallocate funds from existing discretionary accounts, such as contingency, community partnerships or special events, or defer consideration until the next budget cycle. Alternatively, City Council may elect not to pursue a funding-based approach and continue the existing City practice providing bilingual information and referrals through the City website and Police Department.

If City Council determines additional support is warranted, Fullerton could contract with qualified nonprofit or legal aid providers experienced in immigration defense. Organizations such as the Public Law Center, Community Legal Aid SoCal and the Immigrant Defenders Law Center (ImmDef) have the established infrastructure, licensure and accountability systems to provide such services. The City could also explore partnerships with state-funded providers currently supported by the California Department of Social Services, including Access California Services, the Orange County Labor Federation and World Relief Corporation, which deliver outreach, education and limited legal assistance in Orange County.

City Council could direct staff return to City Council with a list of potential partners, funding options and associated fiscal impacts, as well as draft agreement terms defining eligibility, scope and reporting. Alternatively, Fullerton may continue focusing on outreach, transparency and public information as the most appropriate approach at this time, if City Council prefers not to initiate a funding or partnership program.

Consideration of a Rental Registry Program

Other jurisdictions have also discussed establishing a Rental Registry to improve transparency and data collection on local housing conditions, rent trends and eviction

activity. Such a program could provide a useful tool for monitoring tenancy stability and support housing policy decisions but it would require significant staff and financial resources to implement and maintain.

Developing a rental registry involves creating a database to collect and track information from all residential rental property owners, including tenancy start dates, rent levels and notices of eviction or rent increases. Establishing and maintaining this system would require substantial initial investment—estimated at approximately \$300,000 for software and setup—with annual operating costs totaling about \$85,000, not including the addition of three to seven full-time equivalent (FTE) positions for administration, compliance and data management. The City could recover costs with an annual per-unit registration fee, typically ranging from \$29 to \$200, depending on program scale and exemptions.

Staff also notes implementing a rental registry raises administrative and legal considerations related to data privacy and public disclosure. The City would need to establish safeguards to ensure compliance with public records laws while protecting personally identifiable tenant information. Furthermore, a registry could provide valuable data on rental trends, but it would not directly address affordability challenges or provide financial relief to renters.

The City of Fullerton administers a federally funded rental assistance program which provides short-term housing support to eligible households. Federal restrictions make this program available only to U.S. residents, meaning the City cannot use those federal funds to assist individuals without lawful immigration status. Therefore, the City would need to finance any rental assistance or tenant-relief efforts targeting those impacted by immigration enforcement entirely from local discretionary funds.

Staff could prepare a feasibility analysis identifying potential technology solutions, staffing needs, costs and possible funding mechanisms, should City Council wish to explore this option further. Alternatively, City Council may determine the resource requirements and limitations associated with a rental registry outweigh the potential policy benefits at this time.

This report provides an overview of existing City policies, the regional context and actions taken by nearby jurisdictions in response to immigration enforcement activities. The information and options presented should assist City Council in evaluating potential next steps consistent with the City's legal authority, available resources and commitment to transparent and inclusive governance. Staff recommends City Council receive this report and provide direction regarding any desired follow-up actions. Follow-up options range from maintaining the current informational model to establishing a structured partnership or funding program in collaboration with nonprofit service providers. Each approach carries different fiscal and policy implications and staff seeks City Council direction on whether to explore, develop or defer such efforts.

Attachments:

- Attachment 1 – Exhibits A through V
- Attachment 2 – Executive Order
- Attachment 3 – Letter from Secretary of Transportation

cc: Interim City Manager Eddie Manfro